

Betsson & Anti-Corruption – Policy and framework summary

This policy summary is based on Betsson's Anti-Corruption Policy (the "Policy") and framework and aims to convey its most important principles.

Fair play

Within Betsson – we play fair. This means that Betsson has a zero-tolerance approach to corruption, bribery, and related corrupt practices. It is inherent in the Betsson DNA to honestly participate in, and fairly contribute to, the communities in which we have offices, employees, and operations. The Policy sets the objective and explains more in detail the core principles on how Betsson works with anti-corruption. The Policy is implemented in all parts of Betsson Group taking applicable local legislation into account. We apply these standards not only to ourselves, but to all suppliers, vendors, consultants and whoever Betsson is doing business with.

Prohibition on corrupt practices and guidance on how to act accordingly

It is of utmost importance that Betsson inspire and maintain the trust from our customers, shareholders, business partners and employees as well as the societies in which we offer products, holds licenses, or operate in. To remain trustworthy in our conduct with these stakeholders, our Code of Conduct clearly sets Betsson's zero-tolerance for corruption while the Policy affirms this position and goes further, but the Policy also covers closely related areas such as how to handle conflict of interest. Therefore, the Policy should be read in conjunction with our Code of Conduct available on Betsson's websites.

There is no official and universal definition of the word 'corruption' but one common meaning to it is the "abuse of entrusted power for personal gain" (which also can be someone else's gain). It should be noted that what constitutes corruption and bribery partly has a cultural dimension to it, where in some regions of the world certain behaviour or hospitality can be more acceptable than in others. This fact can, however, never be an excuse to participate in corrupt practices or bribery. All Betsson employees, directors, vendors, suppliers, associated affiliates, consultants, and partners shall always act in an ethical manner, and more importantly, never take part in any corrupt practice. All persons working for Betsson are, within the framework of the policy, provided with guidance, including examples, on how to act in different common situations (covering e.g. gifts and business entertainment, sponsorships, political donations, relations with suppliers/partners, etc.) as well as subject to re-occurring training on anti-corruption and are informed about consequences of non-compliance.

Risk-based approach to corruption and a sound speak-up culture

Betsson's anti-corruption measures are risk-based. Therefore, Betsson follows a risk-based approach in organising the day-to-day work of integrating control mechanisms and processes relating to anti-corruption. The guiding principle is that resources shall be directed in accordance with priorities, so that the greatest risks receive the highest attention. Based on guidance from United Nations and Transparency International, Betsson's assessment includes country-specific risks, business area risks, transactional risks, business opportunity risks, partnership risks and internal risks. The risk assessment is coordinated by the Governance, Risk and Compliance function with input from key stakeholders within the organisation who have a relevant role as part of the anti-corruption framework.

Anti-corruption awareness and actions are everyone's responsibility, but the overall and ultimate accountability lies with the Board of Directors and the President & CEO of Betsson AB. Each employee is expected to be vigilant and report suspicious attempts or committed acts of bribery and corruption. To safeguard a sound speak-up culture, Betsson has a Whistleblowing system in place to provide possibilities to report concerns in a confidential way and without the fear of being retaliated against.