

Whistleblowing Policy

For Betsson Group

GRC-013

Approved 2025-11-20 by the Board of Directors in Betsson AB

Version log

Revisions

Date	Version	Author	Description of changes
2022-09-30	1.0	Senior GRC Manager	Initial version.
2023-10-04	1.1	Senior GRC Manager	Addition that the Global Whistleblowing Organisation's "direct, unrestricted, and confidential access" also includes other departments.
2024-10-09	1.2	Senior GRC Manager	Moderate change consisting of addition of a precedence clause stating that an Employee's good faith reporting of wrongdoings to authorities shall not be considered as a breach of a confidentiality undertaking.
2025-09-17	1.3	VP GRC and Senior GRC Manager	Minor clarifications and updated title (CLO).

Revisions approved by the Board of Directors

Version	Date of Policy	Date Approved
1.0	2022-09-30	2022-11-24
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1. Background and purpose

- 1.1. Betsson Group (“Betsson” or the “Group”) is committed to conducting business with the highest standards of professionalism, integrity, and ethical behaviour, in line with the Group’s Code of Conduct and corporate values. Betsson takes every effort to avoid any malpractices that can result in serious consequences for the Group or its employees. However, all organisations face the risk of wrongdoings in any part of the business from time to time. A culture of openness and accountability is essential to prevent such situations occurring and to address them when they do occur.
- 1.2. The purpose of this Whistleblowing policy, hereafter the “Policy”, is to establish the cornerstones in Betsson’s responsibility to provide, encourage and facilitate a secure environment to report wrongdoings within the Group, ultimately to prevent or reduce the risks of various unethical, unlawful, or improper practices or activities.
- 1.3. When a person who reports internally within Betsson, or externally to a competent authority or publicly discloses information on breaches acquired in the context of his or her work-related activities, he or she is referred to as a “Whistleblower” in this Policy.

2. Applicability and scope

- 2.1. This Policy applies to all employees, consultants, independent contractors, directors or similar statutory officials, volunteers, and trainees in Betsson, irrespectively of type or nature of employment. For the sake of simplicity, all these categories are below jointly referred to as “Employee(s)” irrespectively whether there exists an employment contract or not.
- 2.2. This Policy is to an applicable extent based on the EU directive 2019/1937 of the European parliament and of the council of 23 October 2019 on the protection of persons who report breaches of union law and the ISO 37002:2021 Whistleblowing management systems – Guidelines, with the necessary customisation to Betsson’s internal rules framework and organisation.
- 2.3. Reporting on personal grievances, customer complaints or incident management is out of scope for this Policy. Please refer to HR, the customer complaints team, or the information security team for such concerns.

3. Policy statement

3.1 Openness and trust

- 3.1.1. Betsson strives to maintain a transparent business climate with high ethics and corporate standards. In this regard, Betsson values the trust and respect earned from both Employees and external parties affected by the Group’s business and operations.
- 3.1.2. Betsson encourages an ‘open door policy’ meaning that all Employees shall feel safe and comfortable to provide or solicit feedback and voice any concerns within the Group with their immediate manager or the manager’s manager including any other relevant contact person. In some cases, a concern can also be raised with a specific subject

matter team within the Group. This open-door policy enables Betsson to address and correct any wrongdoings, malpractices, and other forms of breaches at an early stage which is beneficial for all concerned persons and the Group.

- 3.1.3. If an Employee, for any reason, does not feel secure to address a particular problem or matter openly and directly, he or she shall have access to a reliable and impartial whistleblowing channel.

3.2 Prohibition of retaliation

- 3.2.1. Retaliation shall be understood as any direct or indirect act or omission which happens in a work-related context and is prompted by internal or external reporting or by public disclosure, and which causes or may cause unjustified detriment to a Whistleblower.
- 3.2.2. Examples of retaliation can include unjustified dismissal, suspension, demotion, transfer, change in duties, alteration of working conditions, adverse performance ratings, disciplinary proceedings, reduced opportunity for advancements, denial of services, blacklisting, boycotting, damaged reputation, disclosure of the Whistleblower's identity, financial loss, prosecution or legal action, harassment, isolation, and imposition of any form of physical or psychological harm.
- 3.2.3. Betsson prohibits managerial personnel from taking retaliating actions against a Whistleblower who voices wrongdoings in good faith or against an Employee who raises his or her concerns through other means or channels.
- 3.2.4. Employees in managerial positions found to have violated the prohibition of retaliation against a Whistleblower or a person intending, trying, or planning to make a whistleblowing report or raise a concern through other means can be subject to disciplinary actions corresponding to the severity of the retaliating actions taken.

3.3 Protection from retaliation

- 3.3.1. Whistleblowers and Employees shall be protected against any form of retaliation, whether direct or indirect, taken, encouraged, or tolerated by a person working for a Betsson entity (this includes both managers and colleagues) as a result of internal or external reporting or by public disclosure..
- 3.3.2. If a Whistleblower or an Employee believes that he or she has suffered any such retaliating treatment, the Employee is asked to inform Betsson AB's Vice President for Governance, Risk and Compliance ("VP GRC") and/or Betsson AB's Chief Legal Officer ("CLO"), alternatively, his or her manager immediately.
- 3.3.3. The protection afforded to a Whistleblower includes both protection from any person(s) trying to take any retaliating or detrimental actions against the Whistleblower and protection against any person(s) seeking to find out the Whistleblower's identity.
- 3.3.4. All attempts to unduly reveal the Whistleblower's identity may result in disciplinary actions.

4. Whistleblowing organisation

4.1 Global reporting channel

- 4.1.1. All Employees shall have access to a global, independent, and impartial whistleblowing channel, referred to as the “Global Whistleblowing Channel”. The Global Whistleblowing Channel shall be managed, handled, and operated by skilled and suitable personnel. The Global Whistleblowing Channel, together with the personnel responsible for its management, is jointly referred to as the “Global Whistleblowing Organisation”.

4.2 Roles, responsibilities, and authorities

- 4.2.1. The Board of Directors in Betsson AB (the “Board”) is responsible for adopting and overseeing the implementation of this Policy. The Chairman in Betsson AB and a board member appointed by him or her shall for transparency reasons have access to, or immediately be informed of, all incoming reports submitted to the Global Whistleblowing Channel, but neither of them shall have any responsibility in terms of process management of received reports.
- 4.2.2. The CEO of Betsson AB is responsible to ensure that all Betsson subsidiaries comply with relevant local legislation by setting clear instructions on delegation. The governance related administration of local whistleblowing channels that may need to be set up due to local legislation, shall be regulated by a Whistleblowing Instruction, which shall be approved by the CEO of Betsson AB.
- 4.2.3. The CEO is responsible to safeguard that the Group is provided with the necessary resources to ensure continuous improvement of the whistleblowing management system encompassing the designated global and local channels and the persons managing them.
- 4.2.4. VP GRC shall have the main responsibility for the Global Whistleblowing Organisation including the management of incoming reports. This responsibility can to an appropriate extent be delegated, but VP GRC remains ultimately responsible for the Global Whistleblowing Organisation to ensure its independence. Further, VP GRC is responsible for reporting on the performance of the Global Whistleblowing Organisation to the Board on a reoccurring basis and as deemed appropriate.
- 4.2.5. VP GRC is responsible for ensuring that the Global Whistleblowing Channel including its organisation is adequately resourced and that responsibilities are assigned to personnel who have the appropriate competence, integrity, authority, independence, and impartiality to perform the duties at hand.
- 4.2.6. The Global Whistleblowing Organisation shall have direct, unrestricted, and confidential access to the Group management team and the Board including any other function or department within the Group that may need to be consulted for the proper investigation of a report.

4.3 Guiding principles

- 4.3.1. To ensure that Employees have continued trust and confidence in the Global Whistleblowing Channel and to promote a secure and impartial process management

of investigations, the organisation and handling of reports shall be governed by the following fundamental principles;

- **Anonymity:** Even though it is encouraged that a Whistleblower provides his or her name when making a report, it is more important for Betsson to identify the wrongdoing rather than identify the person reporting about it. This means that anonymous reporting shall be possible and acceptable to provide a genuine speak-up culture. Should it be necessary for anyone investigating a concern to know the Whistleblower's identity, the Whistleblower's consent to disclose his or her identity shall be obtained in advance.
- **Duty of confidentiality:** All information submitted in the Global Whistleblowing Channel shall be treated with the highest degree of confidentiality. The information shall only be shared with the relevant persons on a strictly need-to-know basis (i.e. when there is legitimate purpose, performance of duties or discharge of legal obligations). The identity of a Whistleblower shall be disclosed only with consent from him or her or when a Betsson entity is legally or judicially obliged to disclose the Whistleblower's identity.
- **Four-eyes-principle:** All investigations and decisions regarding the process management of whistleblowing reports shall be carried out by at least two involved persons to ensure that all matters are thoroughly and impartially assessed.
- **Presumption of innocence:** Each person subject of a report shall have his or her identity protected to the extent possible and shall have the right to a timely, fair, impartial, and confidential investigation. The subject of the report shall be presumed innocent until it is made clear that the claims are well-founded.
- **Conflict of interest:** Employees shall have full trust and confidence in the Global Whistleblowing Channel. The persons appointed to fulfil the management of the channel shall, in addition to be sufficiently knowledgeable and skilled for the task, ensure that there is no conflict of interest that may impact their objectivity or responsibilities. This includes both i) any relationship to the Whistleblower, ii) the person accused of the wrongdoing and iii) the reported wrongdoing itself (i.e. if any whistleblowing official is mentioned in the report).

4.4 Decision-making

- 4.4.1. VP GRC and CLO shall be authorised with the appropriate powers to jointly manage and decide in matters relating to the administrative handling of reports and thereto related issues in the Global Whistleblowing Channels.
- 4.4.2. In case VP GRC and CLO cannot reach an agreement in how to handle or decide in a certain matter, VP GRC shall escalate the matter to the Chairman of the Board to determine the case.
- 4.4.3. Should a report, because of the conclusion of an investigation, require a material decision or similar action to be taken, VP GRC and CLO are responsible to address the concern to the respective decision-making body in the Group based on the nature and significance of the matter and in accordance with the Corporate Governance Policy.

5. Reportable scope

5.1 What can be reported?

- 5.1.1. Employees can report wrongdoings in the Global Whistleblowing Channel when he or she feels, for any reason, that the issue cannot be raised or voiced through regular means (e.g. with the Employee's manager, the manager's manager or directly to the person(s) involved in the malpractice).
- 5.1.2. A wrongdoing can be understood as action(s) or omission(s) that can cause harm and include, but is not limited to, the following:
- i) Breach of national law or the EU acquis, such as e.g. fraud, corruption, money laundering, including bribery,
 - ii) Breach of Betsson's Code of Conduct and the Company values, other Internal Rules, or local policies,
 - iii) Gross negligence, unauthorised use of funds or resources, abuse of authority, conflict of interest, gross waste, or material mismanagement or any
 - iv) Actions or omissions resulting in damage or risk of harm to human rights, the environment, public health and safety, safe work-practices, or the public interest.
- 5.1.3. The wrongdoing should normally constitute a threat or harm to the public interest rather than the private interest to qualify for whistleblowing protection. This means that Employees, among others, reporting concerns about conventional employment issues or personal grievances relating to the working environment through the Global Whistleblowing Channel may not be protected according to the relevant whistleblowing legislation unless those concerns relate to systematic and structural breaches of laws or regulations (which in itself can be a threat or harm to the public interest).
- 5.1.4. If an Employee still submits a report on personal grievance in the Global Whistleblowing Channel such report shall be forwarded to the responsible persons within the HR department and treated confidentially.

5.2 Who can report?

- 5.2.1. All employees, consultants, independent contractors, directors or similar statutory officials, volunteers, and trainees in Betsson, irrespectively of type or nature of employment or contract, who acquires information on wrongdoings in a work-based context can make a report.

5.3 When can a report be made?

- 5.3.1. The Global Whistleblowing Organisation shall treat all disclosures of malpractice seriously. A person does not need to have solid proof that a certain malpractice has taken place, but he or she must have reasonable grounds to believe, based the circumstances and the information available at the time of reporting, that the concern to be reported is true (reporting in good faith). This means that a report can be made without any solid evidence, further investigations or attempts of obtaining more

information of the wrongdoing. All it takes is that the Whistleblower's suspicion and reporting of a wrongdoing is honest and sincere.

- 5.3.2. Appropriate disciplinary or legal actions can be taken against an Employee who is found to have made a report that they know to be untrue or unfounded.

5.4 How shall a report be made?

- 5.4.1. The Global Whistleblowing Channel shall be easily accessible on the Company's intranet. Reporting shall be made possible in writing, orally and by way of personal meeting.
- 5.4.2. To ensure an efficient and thorough investigation of incoming reports, the Whistleblower is encouraged and recommended to provide at least the following information:
- i) A brief description of the wrongdoing,
 - ii) The date and location of the wrongdoing,
 - iii) The identity of the wrongdoer(s),
 - iv) Particulars of witnesses, if any,
 - v) Supporting evidence and/or documents, if any, and
 - vi) Other details deemed to be useful to facilitate the screening and investigation of the report.

5.5 How is the report handled?

- 5.5.1. When a report has been received, an initial assessment shall be made to determine whether the concern falls under the scope of whistleblowing and therefore shall be investigated. Thereafter, an assessment shall be carried out to understand who, or which function, should be consulted to perform an investigation of the concern. The Whistleblower may be asked to provide more information or details about the wrongdoing; however, it is not mandatory to do so.
- 5.5.2. An acknowledgement of receipt shall be provided to the Whistleblower within seven days after the report was made and registered in the Global Whistleblowing Channel.
- 5.5.3. Once the investigation has been concluded, reasonable feedback shall be communicated to the Whistleblower, at the latest within three months from the receipt of acknowledgement was sent to the Whistleblower. Should an investigation require more time, the Whistleblower shall be duly informed about this and when feedback can be expected.
- 5.5.4. A risk assessment shall be done in conjunction with the initial screening to understand if any protective measures is required in relation to the Whistleblower. All reasonable steps to prevent such risks from materialising shall be taken.
- 5.5.5. All personal data related to received reports and general management of the Global Whistleblowing Channel shall be managed in accordance with Betsson's Data Retention Policy and in line with relevant privacy and data protection laws.

6. Whistleblowing in EU Member States

- 6.1. Internal reporting: When required by applicable legislation, all concerned Betsson subsidiaries shall offer a local whistleblowing channel available to Employees working at, for, or with that local legal entity.
- 6.2. External Reporting: Employees in EU member states shall have easily accessible information on how to access and use external reporting channels managed by competent authorities outside of Betsson and under which specific circumstances and prerequisites such external reporting channels can be used.

7. Disciplinary actions and policy guidance

- 7.1. The Global Whistleblowing Channel is designed to deal with reasonable concerns that Employees have reported on which they honestly believe to be true, to offer anonymity, and to protect Employees against retaliation. Given the importance of a well-functioning, reliable and accessible channel to voice wrongdoings, Betsson takes any abuse of the Global Whistleblowing Channel seriously.
- 7.2. Any Employee who violates this Policy may be subject to appropriate legal or disciplinary action to prevent recurrence of the violation. In determining the level of punitive action to be taken, consideration will be made based on the nature, severity, and the frequency of the violation made including whether the Employee is employed at Betsson or working as a consultant for Betsson.
- 7.3. In the event that an employment agreement, consultancy contract or any other similar legally binding document entered into between a Betsson entity (an entity directly or indirectly controlled by Betsson AB), and an Employee, contains confidentiality clauses, provisions or restrictions which limits the Employee's rights to rightfully disclose or report information about wrongdoings (as defined in this Policy) to authorities, such clauses, provisions or restrictions shall be left without regard given that the disclosure or reporting was made in good faith by the Employee.

7.1 Questions and consultation

- 7.1.1. In case an Employee has a question or needs consultation regarding his or her rights in relation to whistleblowing, he or she is encouraged to contact the GRC function at grc@betssongroup.com.
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