

GROUPWIDE WHISTLEBLOWER POLICY (EUROPE)

Contact

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[Tipico Whistleblower Portal](#)

[C2D Whistleblower Portal](#)

Document Control

01.Target Audience

All Tipico Group employees, business partners and relevant stakeholders of the Tipico entities located within Europe.

02.Classification

This document is classified as "PUBLIC".

03.History

Version	Modifications	Date	Type	Responsible
1.1	Draft	16/10/2014	Draft	Martin Schillig
1.2	Approval of Director of HR	22/10/2014	Draft	Kevin Norville
1.3	Review by Information and Consultation Representative	28/10/2014	Draft	Andre Zammit
2.0	Released	04/03/2015	Release	Kevin Norville
3.0	External Ombudsman	29/03/2016	Release	Joachim Haeusler
3.1	Review by Hogan Lovells, confirmed by Tipico Legal Department.	06/09/2017	Release	Joachim Haeusler
3.2	Review by Sarah Iop, Confirmed by Information and Consultation Representatives in Malta and Croatia, B&T and C2D	28/11/2023	Draft	Sarah Iop
3.3	Released		Release	Sarah Iop

Whistleblowing policy

Applicability

This whistleblowing policy is applicable to all employees, business partners of companies belonging to the Tipico Group sitting in Europe (hereinafter the "Tipico Group", the "Group" or "Tipico") and other relevant stakeholders, unless specific local policies have been implemented. Please refer to the Reporting Officer (as per information provided above) in case of any uncertainties.

In Europe, the Tipico Group has direct or indirect subsidiaries in Malta, Germany, Austria, Croatia, and Gibraltar. In these countries, there are different regulations concerning Whistleblowers.

This policy does not intend to change (extend or limit) the scope of the local regulations applicable to the different locations and subjects to whom it is addressed. Where local regulations differ from what stated in this document, it must be understood that laws prevail, in any case.

Definitions

"Whistleblower" means any employee, business partner or other relevant stakeholder who makes a disclosure that there is some wrongdoing occurring within the Tipico Group to the Reporting Officer or the relevant authority accordingly.

"Reporting Officer" is the Tipico Group employee appointed to give Whistleblowers a protected reporting channel for possible illegal activities. Whistleblowers can contact this impartial individual on a confidential and anonymous basis if they have observed any improper business practices in the Company. The Reporting Officer can be reached through the Whistleblower Portal (linked) or directly via email. The persons entrusted with this role must be impartial, independent and lack any conflict of interest. They are bound to confidentiality and must guarantee the anonymity of the Whistleblower whenever this is required, in the terms stated below ("General").

General

Tipico is committed to maintaining an open culture with the highest standards of honesty and accountability, where employees, business partners and other relevant stakeholders can report any legitimate concerns in confidence. Tipico takes all malpractice very seriously, and this document sets out the procedure by which employees can report legitimate concerns.

Whistleblowers do not have to fear any negative consequences of discriminatory or disciplinary nature for making a report, provided that the report is made in good faith. The aim is that the career of any person should not in any way be harmed or hindered as a result of their disclosure. Moreover, Tipico will adhere to any applicable laws providing for further protection of Whistleblowers. Any reprisal or similar action taken against a Whistleblower because they have made a disclosure in good faith may be regarded as gross misconduct and may result in disciplinary action.

Confidentiality of reports will be preserved and Tipico will make every effort to keep the Whistleblower's identity and their reports confidential unless:

- The Whistleblower have given their consent;
- Disclosure is necessary for compliance with a legal obligation to which the Company is subject;
- Disclosure is required for the Company or law enforcement agencies to efficiently investigate the report.

Data protection

Tipico adheres to applicable data protection laws.

Tipico will inform the respective individuals whose behaviour has been reported after receiving a credible complaint that leads to an investigation in compliance with applicable data protection laws. Individuals being subject to whistleblowing reports may, for instance, be informed of the alleged facts and of the person in charge of handling the report. The identity of the Whistleblower will not be disclosed unless they have given their consent, or this is strictly necessary for compliance with a legal obligation to which Tipico is subject or for other legitimate purposes and furthermore permitted by applicable data protection and labour laws.

The records of all investigations conducted on the basis of the reports will be treated confidentially. They will be stored in accordance with applicable data protection and labor laws and will be deleted after expiry of an adequate and applicable retention period, unless deletion is prohibited by applicable laws.

Records that relate to pending disputes or investigations are in general not deleted. In such cases, the information must be stored for the duration of the respective dispute or investigation or even longer, if required and permitted under applicable data protection laws.

Actions to be taken by the persons addressed to in the policy

If anybody knows, or suspects, that some wrongdoing is occurring within the Group, they should raise the matter immediately through the regular reporting channels (e.g. STR forms for concerns regarding money laundering; reports to line managers for employees; report to their point of contact in Tipico for external stakeholders). If the person has concerns about using those channels or does not know, whom to approach, he or she can approach the Reporting Officer by using the Whistleblower portal.

Tipico expects individuals to report established or soundly suspected breaches of applicable laws, regulations and provisions and specified internal guidelines that they have become aware of in the course of their employment or relationship with the Group. Tipico expects anybody to report in particular the following, in line with this policy, unless their local applicable regulation states otherwise:

- Criminal conduct relating in any way to the business or interest of Tipico;
- Violation of applicable national and international laws, regulations and provisions, in particular with regard to corruption, fraud, fraudulent or deliberate errors in connection with our books and records, conflicts of interest, fair competition and money laundering (please also note that there is a process for suspicious transaction reports);
- A breach of health and safety legislation.

Actions to be taken by the Reporting Officer

The Reporting Officer does a first plausibility check and might follow up with the Whistleblower in order to decide whether the information received is sufficient to start the investigation.

The Reporting Officer will keep the identity of the Whistleblower confidential insofar and to the degree that this is permitted by applicable laws, in particular by data protection and labour law requirements. However, it is still possible that the Whistleblower's role as the information submitter might become apparent to Tipico and/or to third parties during later investigations of evidence reported. In any case the Reporting Officer will make every effort to keep the Whistleblower's identity and/or their reports confidential, unless:

- The Whistleblower has given their consent;
- Disclosure is necessary for compliance with a legal obligation to which the Company is subject;
- Disclosure is required for the Company or law enforcement agencies to efficiently investigate the report.

Alerting outside bodies to a potential wrongdoing

If reporting lines and processes within the company cannot be used, a Whistleblower should always, in the first instance, refer to the Reporting Officer about a potential wrongdoing. Only if the internal channel fails to take action, information about potential wrongdoings shall be disclosed to relevant external bodies (e.g. regulatory authorities).

Contacting the media

The media is not a relevant external body. Allegations about the Group must not be raised with the media. Contacting the media may be tantamount to breach of confidentiality in terms of the contract of employment.

Protection against detriment

As per regulations, protection against detriment is only granted if the disclosure is made under the terms of the law.

Failure to notify the Group when reasonably aware or certain of an occurrence included in the list of incidents as set out above may be regarded by the Group as misconduct and may be tantamount to a breach of contract. Failure to notify internally (*i.e.* to the line manager or Reporting Officer) before notifying externally without good cause is also regarded as misconduct.

The employee may only disclose information that is true to the best of his or her knowledge. The dissemination of false information is a criminal offence in many countries.

Review of the Policy

This Policy will be kept under constant review. Changes will be agreed with the Information and Consultation representative and will be considered with regards to external good practice, legislation, internal recruitment, retention data, and external information.