



TIPICO GROUP SUPPLIER CODE OF CONDUCT

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1. INTRODUCTION AND SCOPE

Tipico's¹ approach to business is based upon a core set of values. **Trust, Collaboration and Integrity** are the core values that embody our commitment to society, our shareholders, our business partners and our colleagues. They guide us as individuals and collectively as a company.

This Supplier Code of Conduct (hereinafter „Code“ or „Code of Conduct“) sets up the high standards that we require from all our Suppliers, business partners and/or external contractors (hereinafter “Suppliers”) to uphold our business integrity. No financial objective, marketing target or effort to outperform the competition is more important than our commitment to integrity.

We expect the same from our business partners and Suppliers.

This Code is also the foundation of all contractual relationships with Tipico, since it outlines the requirements needed to protect human rights and ensure sustainable development. By having a business partnership with Tipico, we anticipate that our Suppliers have acknowledged and accepted the measures within this Code.

Any violations of the obligations within this Code will be taken seriously, and steps will be taken by Tipico to address the concerns (including termination of contract, if necessary).

Prior to entering into a business relationship with Tipico, we expect our Suppliers to acknowledge their adherence to this Code of Conduct, or to provide us with a copy of their own code of conduct which demonstrates equal or similar requirements to the ones found in this Code.

Tipico Suppliers are expected to:

- » confirm their agreement to comply with this Code (and any future revisions) during the Tipico Vendor due diligence process (or to provide their own, being equal or similar to this Code);

- » provide the necessary information during the Tipico environment, social and governance (“ESG”) assessment to show their adherence to the fair practices described in this Code;
- » share the principles of this Code with their officers, employees and key sub-contractors that support Tipico or work on our projects;
- » ensure a fair and honest business relationship with all their stakeholders, including officers, employees, sub-contractors and other third parties;
- » inform us if they are unable to comply with this Code;
- » speak up if they are concerned about any actions or decisions that contravene the standards set out in the Code (please refer to “Whistleblowing” section of this document);
- » adhere to the laws of the countries in which they operate. In countries where there is no relevant law in place, the standards inherent in this Code will be applied.

¹“Tipico” hereby and hereinafter shall mean Tipico Group Ltd and all its subsidiaries forming part of the Tipico group of companies.



2. DIVERSITY AND INCLUSION

At Tipico uniqueness is key. Tipico has zero-tolerance against any forms of discrimination, bullying and harassment, and hires, promotes and fairly rewards employees based on their merit, skills and capabilities.

In line with its own values, Tipico expects its Suppliers to commit to the below measures:

- » Suppliers shall ensure that no form of discrimination or harassment is present at any stage of employment; from the interview, assessment and selection of employees, their employment terms, remuneration, access to training and grounds for dismissal;
- » Suppliers should also have / strive to have policies or guidelines in place to ensure equal employment practices, which make qualifications, skills and experience the basis for the recruitment, placement, training and advancement of staff at all levels;
- » Suppliers shall ensure that all employees create a cooperative, fair and unprejudiced working atmosphere;
- » Suppliers should respect the rights of employees to freedom of association and collective bargaining;

- » Suppliers shall protect the health, safety and well-being of their employees, customers and visitors and reasonably adjust the physical environment to ensure adequate access and safety for anyone with disabilities.

3. ENVIRONMENT

Since it matters to us, Tipico supports a precautionary approach and integrates environmental responsibilities and considerations into daily operations and business decision-making processes.

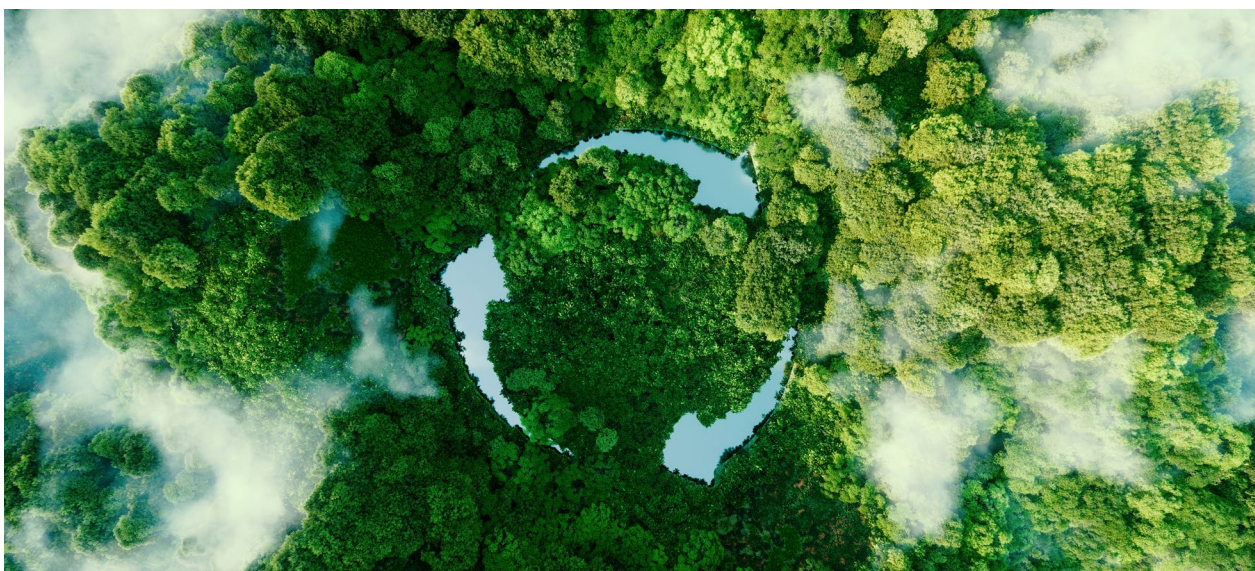
The extensive process encompasses:

- » measurement of environmental performance by use of Global Reporting Initiative standards;
- » evaluation of environmental impacts of facilities and operations with a focus on implementing a continuous improvement process;
- » efficient use of natural resources to minimize waste. Among others by allocating recycling possibilities, by managing and mitigating impact

- of harmful substances as defined by industry standards and by focusing on prevention of pollution;
- » use of innovations and technologies to minimize atmospheric emissions;
 - » consideration of environmental indicators in purchasing processes. Tipico promotes awareness regarding environmental guidelines for employees and the public and requests all Suppliers to follow the same high environmental standards.

We expect our Suppliers to, in so far as possible:

- » commit to improvements in the company's environment management systems through appropriate tools, procedures and policies;
- » maintain, enhance, or conserve biodiversity / ecosystems for their operational activities; commit to no deforestation, including conversion of natural forests and high conservation value forests;
- » commit to raise environmental awareness in their organization through communication, trainings and specific initiatives;
- » promote education towards understanding how employees and partners can personally contribute to a successful environmental performance;
- » incorporate sustainability into their corporate policy and daily work and raise awareness about their contribution;
- » environmentally soundly handle, collect, store and dispose of waste in accordance with the rules in force in the applicable jurisdiction;
- » not cause harmful soil contamination, water pollution, air pollution, harmful noise emission or excessive water consumption which (a) significantly impairs the natural basis for the conservation and production of food, (b) denies a person access to safe drinking water, (c) impedes or destroys a person's access to sanitary facilities; or d) harms the health of a person;
- » not being involved in unlawful eviction and the prohibition of unlawful taking of land, forests and waters in the acquisition, development or other use of land, forests and waters, the use of which secures the livelihood of a person;
- » not to manufacture mercury-added products, use mercury and mercury compounds in manufacturing processes and treat mercury waste contrary to the provisions of the Minamata Convention;
- » not to produce and use chemicals pursuant to Article 3(1)(a) and Annex A of the POPs Convention, in its latest version;
- » not to export hazardous waste and other waste within the meaning of Article 1 Basel Convention unless it is in compliance with the Basel Convention;
- » not to act or omit any act in breach of duty going the above-mentioned points, which is directly capable of impairing a protected legal position in a particularly serious manner and the unlawfulness of which is obvious upon a reasonable assessment of all circumstances under consideration.





4. AML & FRAUD

As one of the leading gaming providers, Tipico commits itself to the highest standards in protecting its business of misuse by money laundering and funding of terrorism or any other criminal activities.

To ensure such standards are met, we have set up highly structured internal processes based on the European Union Anti-Money Laundering ("AML") Directives, including extensive customer and supplier due diligence.

We require all of our Suppliers to abide by all applicable laws and regulations which are relevant to fraud, money laundering, and the funding of terrorism.

5. CORRUPTION AND ANTIBRIBERY

Tipico does not tolerate any form of corruption. We actively work with our stakeholders to avoid any situations that could be construed as such. This does not only apply to Tipico employees, but to anybody working for us, providing services to us, or working on our behalf.

In line with its own values and policies, Tipico expects its Suppliers to commit to the below measures:

- » Suppliers shall comply with all applicable anti-corruption legislation;
- » Suppliers shall not tolerate or enter into any bribery, including improper offers or payments to or from employees, public officials, customers, Suppliers, organisations or individuals;
- » Suppliers shall inform Tipico immediately if they have reason to believe that a bribe or a facilitation payment has been requested from them, or upon any indication of potential corruption taking place within the Tipico Group or by our stakeholders;
- » Suppliers must have an anti-bribery policy / declaration that sets out the principle of zero tolerance to any form of bribery or corruption within their organisation, including facilitation payments.

6. DATA PROTECTION

Due to the nature of the business conducted by Tipico, Tipico deals with countless data every day. These must be protected. Tipico must comply with the current General Data Protection Regulation ("GDPR") of the European Union, as well as any other local and international data protection laws that may apply to the processing activities carried out by Tipico.

We expect our Suppliers to commit to the highest standards in complying with data protection laws, in particular but not exclusively to:

- » offer appropriate technical and organizational measures to protect personal data;
- » guarantee that Suppliers' personnel have undertaken training in the laws relating to processing of personal data;
- » notify Tipico if the event of engaging new sub-processor, and ensure that sub-processor follows the same standards and commitment to data protection;
- » lastly, supplier will keep records and information that are necessary to demonstrate compliance

with applicable data protection laws and provide them on request.

We also encourage our business partners to comply with relevant ISO certifications.

Furthermore, in the event of a data breach, security breach, or any other relevant circumstance, we oblige Suppliers to immediately notify us via dpo.office@tipico.com. This will help us to comply with all applicable regulations.



7. HOSPITALITY, GIFTS AND DONATIONS

Hospitality and gifts are a normal part of daily business and can help foster positive relations with relevant stakeholders. Charitable donations are part of the corporate responsibility portfolio and therefore also serve legitimate goals. Both, however, can also be abused as part of a greater corruption framework. Therefore, Tipico has put in place clear guidelines and boundaries to establish full transparency, to protect the Tipico Group, its employees and partners from suspicions of corruption.

It is acceptable for Suppliers to provide gifts, entertainment and hospitality to Tipico employees if they serve a genuine business purpose and are of reasonable value, timing and frequency.

However, in receiving or providing such gifts and hospitality, our employees must comply with the relevant Tipico internal policy.

8. CONFLICT OF INTEREST

Tipico aims to avoid any conflict of interest during the search of Suppliers and promotes full objectivity during supplier's evaluation from all involved parties.

Our Suppliers are expected to avoid interactions with Tipico employees who are, or appear to be, in conflict with employees who act in Tipico's best interests.

Further, we expect our Suppliers to provide their staff with the necessary policies and guidance to enable them to manage any conflicts (or potential conflicts) of interest. These must reference both personal conflicts and business conflicts.

9. EMPLOYMENT AND HUMAN RIGHTS

Integrity, honesty and respect are essential principles for Tipico and we are devoted to attain the best standards with regards to employment and human rights.

At Tipico we are committed to fighting against any form of modern slavery, that truly is why having our business partners comprehend and comply with our values and ethical standards is a top priority for us.

Based on that, we expect our Suppliers to protect internationally proclaimed human rights and ensure that they are not complicit in violations of those rights. We expect commitment from our Suppliers to the following topics:

- » fair working conditions and health-promoting measures;
- » the elimination of all forms of forced and compulsory / labour through threat, force, fraudulent claims, penalty or other coercion; which includes any work or service which is exacted from a person under the menace of punishment and for which he or she has not offered himself or herself voluntarily;
- » prevention of human trafficking;
- » refraining from any form of child labour. This shall be implemented by not hiring any person under the age of 15 or alternatively according to a national minimum age, if national regulation deviates from this threshold in accordance with Convention No. 138 of the International Labour Organisation;
- » guarantee that workers are treated with respect and given equal opportunity and prohibit harassment or discrimination and unequal treatment (unless is justified by the requirements of the employment based on an employee's age, race, religion, national origin, gender, gender identity, sexual orientation, disability, or any other characteristic; in particular, the payment of equal remuneration for work of equal value;
- » make sure that employees do not exceed the range of hours worked as set by local law. Any extra time worked needs to be voluntary and paid according to local and/or national law;
- » Suppliers will ensure that all occupational health and safety obligations applicable under the law of the place of employment are adhered to in order

to prevent the risk of accidents at work or work-related health hazards;

- » recognition of the freedom of association;
- » provision of a fair wage. The fair wage shall be at least the minimum wage determined by the applicable law and shall otherwise be determined by the law of the place of employment;
- » not to hire or use private or public security forces for the protection of the enterprise's project where, due to lack of instruction or control by the enterprise in the use of the security forces a) the prohibition of torture and cruel, inhuman or degrading treatment is violated, (b) injury to life or limb; or (c) the freedom of association and the freedom to organise are violated;
- » not to act or omit any act in breach of duty going the above-mentioned points, which is directly capable of impairing a protected legal position in a particularly serious manner and the unlawfulness of which is obvious upon a reasonable assessment of all circumstances under consideration.

10. HEALTH AND SAFETY

Occupational health and safety at your workplace matters to us. Tipico takes the safety and welfare of our staff and anyone engaged by, or working with us, very seriously.

Our internal health and safety policy plays an important role in setting and making clear the standards of health and safety that we apply to our business.

In line with our own commitments to occupational health and safety, Tipico expects its Suppliers to commit / comply to the below measures:

- » Suppliers must understand the health and safety risks arising from their work activities, and ensure adequate control of those risks, keeping safe and healthy working conditions at all times;
- » Suppliers will ensure that all employees are provided with the necessary health and safety information and training;

- » Suppliers must ensure they have policies documenting their arrangements for complying with the relevant health and safety laws and regulations, along with their risk assessments.

11. WHISTLEBLOWING

Tipico is committed to maintaining an open culture with the highest standards of honesty and accountability, where employees, partners and Suppliers can report any legitimate concerns in confidence. Tipico takes all malpractice very seriously and has a Whistleblowing policy in place to ensure that employees do not fear any negative consequences for reporting any unethical or illegal behaviour.

Tipico has established a process for its stakeholders including Suppliers, their employees and their own business partners to report any wrongdoing or suspicious behaviour, including breaches of this Code of Conduct and other Tipico policies. Tipico also urges its Suppliers to report any wrongdoing or suspicious behaviour, including breaches of this Code of Conduct and other Tipico policies.

This can be done by contacting the Tipico Procurement and Compliance teams, or by sending an email to the Tipico external ombudsman:

TipicoOmbudsman@hoganlovells.com

The external ombudsman is an external lawyer which has been appointed to give whistleblowers a protected reporting channel for possible illegal activities.



12. CONCLUSION

This Code of Conduct serves to protect the wellbeing of the employees of both Tipico and its business partners, as well as the environment within which they operate. It does this by establishing clear standards for the promotion of ethical, sustainable, and socially responsible business practices. Its success depends on the commitment and collaboration of all parties involved in Tipico's supply chain.

We believe that this Code of Conduct also serves to build trust and long-term relationships with our partners, as together we commit to protect human rights and ensure sustainable development.