

## CODE OF CONDUCT

### ***Introductory remarks***

This Code of Conduct (hereinafter also referred to as the "Code") sets out key corporate values and culture within the Meridianbet Group (hereinafter referred to as the "Company", "Meridianbet", or "Corporation"). The Code encompasses principles and guidelines for the behavior of all employees within the company and externally. This document is intended for all employees, department heads, and sector managers, who are expected to contribute to the respect of corporate standards by setting a personal example in implementing the rules of the Code.

### ***Corporate Values***

As a gaming operator operating in markets worldwide, we are aware that our business plays a crucial role in meeting the expectations of our customers (players), who expect service at the highest industry standards. Meridianbet corporate values are focused on maximizing customer satisfaction, and at the same time encouraging team members to continuously improve and develop their knowledge and skills. Corporate values that enhance the company's operations, and thus contribute to even better business results, represent key elements of the overall corporate values of our Company.

### ***Responsibility to Clients***

All our activities are directed towards efficient, responsible, and quality service provision to our clients. Satisfied clients are our greatest value and the quality that sets us apart from other gaming operators in the market. By developing and providing advanced technologies and digital services, we strive to meet and surpass their expectations, creating an extraordinary user experience.

### ***Digitization of Business***

Well-organized and motivated teams are crucial for its development and progress. The key strategy we apply relates to the enhancement of digital knowledge and skills, especially openness to different thinking and respecting and accepting all forms of diversity. Together, we create common goals, celebrate every success together, and nurture a culture of unity and support for one another.

We continuously change ourselves and our business environment. We recognize opportunities for improvement and the digitalization of business. We constantly seek new possibilities and new markets for business. We encourage initiative and continuously adopt new knowledge and skills necessary for doing business in the digital market.

## ***Integrity***

The trust and integrity we enjoy from our clients are key values for our company. Trust in the certainty of fulfilling our obligations and the quality of providing services to clients, state authorities, suppliers, and partners in general, represents a priority for the company. When carrying out daily work activities, employees in the Corporation should demonstrate the highest level of professional behavior and personal integrity, along with a positive attitude and self-initiative, especially:

- to behave politely, respectfully, fairly, and objectively towards colleagues in the Company;
- to show respect and appreciation in dealing with clients;
- to perform their tasks and duties promptly, diligently and responsibly;
- to behave in a manner that contributes to the preservation and promotion of trust among our suppliers, consultants, partners, regulators and state authorities, demonstrating personal professional integrity, reliability, and efficiency of the Company's operations;
- to use authorizations, business information, and knowledge at their disposal exclusively for the purpose of performing work tasks;
- to timely recognize and eliminate any risks to integrity.

## ***Promotion of Corporate Values***

Employees representing the Company at public appearances, professional development programs, portals, and social networks must express the opinions and positions of the Company in accordance with adopted corporate values, business plans, applicable laws and regulations, and the authorizations they possess.

Employees who are not official representatives of the Company, when making public appearances, creating posts on portals, commenting, publishing photos, and other content on any social network, are required to adhere to corporate values, especially if they are identified on the social network as employees or collaborators of the Company. Also, when commenting and discussing the Company publicly or online, employees must clearly state that they speak on their own behalf and not as representatives of the company.

## ***Non - Discrimination***

Meridianbet prohibits any unjustified distinction, unequal treatment, or omission (exclusion, limitation, or preference) concerning individuals or groups, as well as their family members or persons close to them, in an open or covert manner, based on race, skin color, ancestry, citizenship, national or ethnic origin, language, religious or political beliefs, gender, gender identity, sexual orientation, financial status, birth, genetic characteristics, health status, disability, marital and family status, convictions, age, appearance, membership in political, trade union, and other organizations, and other actual or presumed personal attributes. The Company embraces and promotes the principle of diversity among employees.

## **Whistleblowing**

The Company fosters a culture in which employees feel safe and free to express their doubts about compliance with this Code, openly drawing attention to negligence in performing duties or other offenses that may endanger the Company's operations, workplace safety, public health, and the like.

All information related to internal whistleblowing must be submitted by employees to an authorized person, in accordance with applicable regulations and the Company's internal acts.

Employees who report issues will be provided with legal protection against retaliation and retribution of any kind. All reports on this basis will be thoroughly investigated and treated as strictly confidential.