

CORPORATE ETHICS

Introductory remarks

This paper outlines the Corporate Ethics of Meridianbet Group (hereafter referred to as "Group" or "Company"), as well as the guiding concepts and norms of business ethics that govern all Group personnel. This document's primary objective is to contribute to the performance of business activities with the intention of developing business ethics, good business practices, and the values of conscientiousness and honesty, as well as facilitating corporate transparency within the Group.

Environmental Protection

The Group adopted a strategic document that kicked off the funding cycle for environmental protection projects. By signing a three-year cooperation agreement with the Ministry of Environmental Protection of the Government of the Republic of Serbia, our company committed to investing in global ecological projects of local self-governments in order to improve the environment. The project named "Clean Air - Clear Victory" outlines the need for the planting of thousands of trees in each market in which the Group operates. The Group concludes new environmental protection collaboration programs with student organizations, with the pledge to clean riverbeds, riverbanks and other public spaces. In the retail segment of the business, the Company has adopted a strategy aimed at increasing the proportion of renewable energy sources in total consumption, rationalizing energy and water consumption over the next five years, ensuring the proper handling, disposal, and recycling of waste material, reducing consumption, and implementing innovative digital solutions. The same applies to preventative noise protection techniques in the office and the archival work of the Company's day-to-day activities.

By implementing the most advanced sports betting terminals, the Company has begun to reduce its paper and energy use. In 2023, it is anticipated that investments will continue to be made in the implementation of cleaner and more energy-efficient technologies than those utilized in the previous decade.

Through information, education, and training programs, the Company raises employees' awareness of the importance of a healthy environment in order to increase their commitment to the establishment, implementation, control, and improvement of all business processes and activities aimed at enhancing the environmental quality of life.

Prevention of money laundering and terrorist financing

In conformity with the applicable national, US and EU laws on the Prevention of Money Laundering and Financing of Terrorism (ML/CTF), the Group subsidiaries have adopted the required internal regulations. When implementing business processes, the Group engages in the required activities linked to the identification of persons and suspicious transactions in order to prevent the commission of criminal crimes involving money laundering and the financing of terrorism.

Our established business strategy entails conducting business with reputable partners who operate in compliance with applicable laws and are financed with cash derived from legal sources.

In order to prevent our company from being used as a means of money laundering, appropriate internal regulations have been enacted, software for identifying individuals and transactions has been implemented, and appropriate restrictions have been prescribed in accordance with the regulations of the competent state authorities to prevent any form of illegal payment.

The corporation continually engages in employee education about the prevention of money laundering and financing of terrorism, particularly in the areas of spotting suspicious persons and transactions and supporting the prevention of these actions.

Personal data protection

The company treats the personal information of its employees as a trade secret, in accordance with applicable laws and internal policies. Similarly, the databases of our customers (players) must be stored in line with all applicable national, US and EU laws. Employee files include only pertinent information about the employee and can only be read by the employee who owns the file and no other unauthorized individuals. By signing the Data Confidentiality Agreement, employees who come into contact with the personal data of other employees or users in the course of their employment affirm that they are aware of the obligation to use and maintain the confidentiality of such data and that their unauthorized disclosure is grounds for disciplinary and criminal liability.

Employees are required to protect and preserve knowledge that constitutes a trade secret throughout and after the employment relationship, in accordance with the Company's internal policies and applicable laws.

Information is any written, reproduced, drawn, pictorial, printed, recorded, photographed, magnetic, optical, electronic, or any other data record that, considering its content, has the importance of confidentiality and integrity (integrity) for its owner, i.e., which improper handling and/or disclosure to third parties may cause harm to the organization.

The violation of the obligation to preserve trade secrets is the foundation for establishing labor-legal, criminal, misdemeanor, and/or material culpability, as well as other consequences imposed favorably - by the legal rules of the national market, EU and/or US.

Health and safety at work

Workplace safety and health are two of the most vital business categories.

To provide a safe working environment for all employees, the Group gives special attention to the development and implementation of an effective occupational health and safety system, as well as appropriate standards and procedures to minimize the risks connected with regular business activities.

All personnel are required to completely adhere to all established procedures and to approach each task with a sense of responsibility, using work tools with intention and care. It is vital that employees only execute tasks for which they are trained, competent, and medically fit, and for which the necessary circumstances and equipment are provided.

Professionalism within the work environment

Employees maintain a professional demeanor in the workplace and respect the Company's tangible and intangible assets, including communication and IT assets. This indicates that the property is used in a meaningful and correct manner and only for work-related operations.

The Group adheres to working hours and refrains from engaging in conduct forbidden by the employment contract and internal regulations.

Avoidance of Conflicts of Interest

The Group exerts maximum effort and advocates for compliance with the requirement to avoid conflicts of interest in the execution of business in which the Company is involved, and employees are required to behave entirely in the best interests of the Company when carrying out activities.

In cases where the employee is or is suspected of being in a situation of conflict of interest that favors a person with whom the employee has a familial, friendly, or business relationship, as well as a situation in which personal interests can, could, or appear to be placed above the interests of the Company, they are required to inform the immediate manager by reporting jobs and actions in which there is a personal interest or the interest of a person with whom the employee has a familial, friendly, or business relationship. A related person is the spouse or common-law partner of an employee, a blood relative of the employee in the first line, i.e. in the collateral line up to and including the second degree of kinship, an adoptive parent or adoptee of an employee, and any other legal or natural person who, based on other grounds and circumstances, can be justifiably considered to be of interest related to the employee.

Membership in other organizations shall not impair job quality or clash with the economic goals of the Company.

Prevention of corruption in business

The company prohibits corruption and bribery in its operations and undertakes to take measures to prevent them.

The employee may not make or receive a gift, that implies a thing, right, or service, given or made without appropriate compensation, i.e. benefit, with the exception of a protocol and opportune gift, which may not be made or received in money and securities, in terms of the valid regulations that regulate the matter in question.