

## OUTSOURCING POLICY

### **Overview**

This policy delineates the procedures, conditions, and methodologies by which the companies within the Meridianbet Group (hereinafter also referred to as "Meridianbet" or the "Company") engage third parties to perform operational functions that would otherwise be executed internally. This document aims to establish a consistent, comprehensive, and intelligible framework governing the entire outsourcing process and managing associated risks.

### **Scope**

This policy applies to all functions that Meridianbet chooses to outsource, especially those with material impacts, and extends to all management personnel involved in procuring outsourced services.

### **Purpose**

The primary goal of this policy is to outline the method through which the Company's functions are outsourced to third parties. It provides a structured framework to navigate the outsourcing process and effectively manage risks inherent to outsourcing agreements.

### **Procedures for Outsourcing a Function**

#### *1. Risk Assessment*

- Prior to outsourcing any business functions or services, the Company conducts a comprehensive risk assessment to evaluate the potential impacts on operational performance. It is crucial that the outsourced activities do not compromise the Company's ability to meet regulatory, contractual, and compliance obligations.
- The management will consider the following criteria to determine the risk relevance and priority:
  - The operational importance of the service to be outsourced
  - Potential consequences should the third party fail to deliver the agreed-upon services
  - Possible security risks, including data breaches or failures
  - Costs associated with the outsourcing arrangement

#### *2. Fit and Proper Check*

- Service providers passing the initial risk assessment undergo a fit-and-proper check. This includes:
  - Examination of corporate documentation and recent audited financial statements
  - Verification of regulatory compliance and any historical sanctions

- Assessment of the resumes of key management personnel responsible for the outsourced activities
- Review of internal security and control procedures relevant to the function or service being outsourced

### *3. Concluding the Outsourcing Service Agreement*

- The outsourcing service agreement will encapsulate the general terms, rights, and duties of all parties involved and will include, at minimum:
  - Detailed description of the service to be outsourced, including performance indicators and objectives
  - Commitment to adhere to all applicable laws, especially EU GDPR regulations concerning personal data protection
  - Provision for Meridianbet to access the outsourcer's financial statements and other pertinent data
  - Obligations for the outsourcer to promptly inform Meridianbet of any significant changes that might affect the provision of services
  - Conditions under which subcontracting of services is permissible, ensuring that all original responsibilities are maintained
  - Termination rights as per MGA instructions, and stipulated notice periods allowing Meridianbet to arrange alternative solutions

### *4. Subsequent Due Diligence and Monitoring*

- Continuous monitoring and due diligence of the outsourced provider are imperative and will be conducted as stipulated in this Policy. This includes periodic reviews of the provider's financial stability and any major changes in ownership, conducted at least monthly or as necessitated by the critical nature of the outsourced function.

### **Review and Amendments**

- This policy will be reviewed periodically to ensure it remains effective and relevant to the operational and legal environment