

## WHISTLEBLOWING POLICY

### ***Introduction***

In adherence to the national laws regulating the internal whistleblowing, the hereby policy governs the internal whistleblowing procedures, ensuring a structured approach to the reporting and handling of misconduct or unethical behavior within the Meridianbet Group.

### ***Definitions***

- Whistleblowing: The act of disclosing information that indicates unethical or illegal behavior within the organization. This may include violations of laws, regulations, public health, safety standards, or any act that endangers the environment or public well-being
- Whistleblower: Any individual, whether an employee, contractor, or stakeholder, who reports an incident or behavior that contradicts the ethical standards or legal obligations of Meridianbet Group
- Internal Whistleblowing: Disclosures made to designated officials within Meridianbet Group rather than to external authorities.

### ***Procedure for Whistleblowing***

#### *1. Initiation*

Whistleblowing reports can be initiated by contacting the designated official authorized to handle such reports. Submissions may be made in writing or verbally.

#### *2. Submission Methods*

Written submissions can be delivered directly, sent via email, or mailed through ordinary or registered post. The timestamp of the email or the postmark date will serve as the official time of submission. Verbal submissions will be documented through a formal transcript which converts the spoken details into written form.

#### *3. Receipt Confirmation*

Upon submission, a receipt confirmation will be provided, detailing the submission method, time, and a brief description of the issue reported. The whistleblower can choose to disclose their identity or remain anonymous.

#### *4. Record of Information*

A detailed record of the whistleblowing report will be kept, including information about the whistleblower (if disclosed), the nature of the complaint, and any other relevant details.

## *5. Processing and Investigation*

The authorized officer will review and investigate the report promptly. Appropriate actions will be taken to verify the information and address the reported issue. Reports must be acted upon without delay, and certainly no later than 15 days from receipt.

## *6. Informing the Whistleblower*

The whistleblower will be informed about the progress and outcome of the investigation, provided such disclosure does not compromise confidentiality or the integrity of the investigation.

## **Protection of Whistleblowers**

- Whistleblowers are entitled to protection from retaliation, discrimination, or disadvantageous treatment as a result of their report
- The Group commits to safeguarding the identity of whistleblowers, consistent with legal obligations and the requirements of a thorough investigation
- Measures are in place to prevent any unfavorable actions against whistleblowers, ensuring they do not suffer in their employment or position within the organization

## **Reporting and Documentation**

- A final report detailing the investigation's findings and any actions taken will be compiled and made available to both the whistleblower and senior management
- Recommendations for addressing any identified issues will be proposed and a plan for implementation provided

## **Rights and Responsibilities**

- Whistleblowers have the right to judicial protection should they face harm as a result of their actions, in line with national laws

## **Review and Amendments**

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