

# Code of Conduct

**Kambi**

The background of the slide features a photograph of a diverse crowd of people cheering and raising their hands in excitement. The image is overlaid with a semi-transparent blue gradient that is darker on the left and fades towards the right, creating a modern, tech-oriented aesthetic.

Our purpose

**Bring the thrill to every  
sporting moment**

The background of the slide features a photograph of a crowd of people, likely at a sports event, with many individuals raising their hands in the air. The image is semi-transparent and overlaid with a solid blue gradient, which serves as the background for the text.

## Our vision

**The pioneer of next generation  
betting entertainment that  
players demand and operators  
can't compete without**



# A message from our CEO



Dear colleagues,

Ever since Kambi was founded it has been a company that seeks to operate with the highest levels of integrity, fairness and transparency, and it is these values which we strive to weave into the very fabric of the company's ambition to this day. We are firmly established as the home of premium sports betting solutions, but we are also much more than that.

We are a team of passionate individuals bound by a shared commitment to excellence, integrity and social responsibility. We believe that how we do things is just as important as what we do.

That's why this Code of Conduct isn't just a collection of rules – it's the foundation of our culture.

This booklet outlines our expectations for how we interact with each other, our partners and all the stakeholders we work with. Your commitment to the Code of Conduct and embodying our values of 'Better, Faster, Together' ensures we can maximise our chances of achieving success and delivering meaningful value for each of our partners.

**Werner Becher**  
CEO Kambi Group

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Thank you for reading and welcome to Kambi

# Introduction

**Kambi**

At Kambi, we are committed to creating a workplace that is guided by our core values of 'Better', 'Faster' and 'Together'. These values embody our aspirations to achieve excellence in everything we do, to work with agility and efficiency and to foster a collaborative and supportive environment where everyone can thrive.

## Purpose of Code of Conduct

This Code of Conduct ("Code") serves as a guide for all, outlining the behaviours and actions expected of us as we strive to uphold Kambi's values and maintain a positive and productive work environment. Our Code is the cornerstone of our compliance programme and guides us through our vision of being the pioneer of next generation betting entertainment that players demand and operators can't compete without. By adhering to the principles outlined in this Code, we can collectively contribute to Kambi's success and achieve our shared goals.

## Our values

We are driven by our core values of Better, Faster, Together.

We strive for excellence in everything we do, constantly pushing ourselves to deliver superior solutions and services to our partners. We believe in the power of efficiency and agility, delivering projects with speed and precision without compromising quality. Collaboration lies at the heart of our success, as we foster a culture of teamwork and collective problem-solving. By embracing these values, we not only elevate our work but also empower our partners to achieve their goals. Join us on this journey as we create better outcomes, work faster and thrive together.

### Better



We have relentlessly high standards.  
We rise to the occasion and never settle.

### Faster



Speed in business matters.  
We are brave and take calculated risks.

### Together



We can achieve great things together  
with an atmosphere based on talent,  
respect, trust and joy.



## Who does our Code apply to?

To put it simply, the Code applies to everyone! This Code applies to all employees of Kambi Group plc's ("Kambi") subsidiaries, regardless of their position, role or location. It also extends to all individuals who represent Kambi in any capacity, including, but not limited to, directors, officers, contractors, consultants and temporary workers. The Code outlines the expectations for ethical and responsible behaviour in all aspects of our work, including our interactions with colleagues, partners, suppliers and other stakeholders. Additionally, this Code applies to all communications, both written and verbal, whether they are conducted on company premises, using company equipment or during company-sponsored events. Anyone covered by the Code signs this before joining Kambi and any updates are regularly communicated to the business.

## Our responsibilities

When it comes to our Code, we all strive to be Better, Faster, Together.

### Better

We all adhere to the principles and guidelines outlined in the Code in all aspects of our work. We all maintain high ethical standards and conduct ourselves with integrity in our interactions with colleagues, partners, suppliers and other stakeholders. We all protect the confidentiality of company information and data and handle all information with care.

### Faster

We all strive for continuous improvement and excellence in our work, delivering high-quality products and services that meet or exceed expectations.

### Together

We all uphold Kambi's values of diversity, inclusion and respect, fostering a welcoming and inclusive workplace for everyone. We all maintain open communication and transparency in our interactions, providing timely and accurate information to others.

## Our leaders' responsibilities

Our leaders are purposeful, authentic and lead by our leadership principles: Coach, Play, Win.



Report any concerns or suspected violations of the Code to the appropriate authority within the company.



## Asking for guidance and raising concerns

Kambi's core values, mission and vision require compliance with the law, as well as ethical conduct. We are committed to conducting our business with honesty and integrity.

If you see or experience conduct that is inconsistent with our standards, do not be afraid to speak up. Kambi pledges to take all reported concerns seriously. Every reasonable effort will be made to protect the security of any personal data.

If you want to raise a concern, need access to policies or have any questions, there are multiple contact resources available to you.

You will find more information on raising concerns, whistleblowing and contact information on our Kambi Group Whistleblowing Policy.

### Your manager

- Your manager is usually in a good position to understand and respond to your concerns.

### Our third-party partner, SafeCall

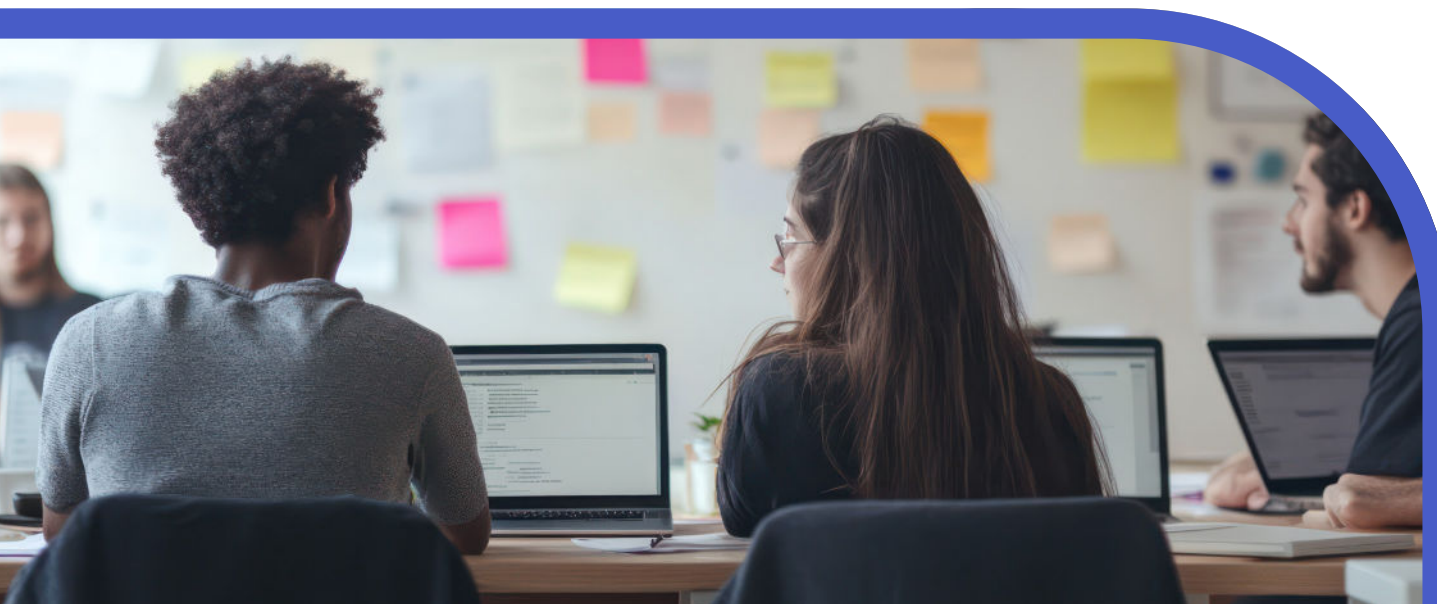
- Kambi partners with SafeCall, an independent third-party whistleblowing hotline who you can anonymously ask questions or share concerns with.
- You can raise a concern on their website by filing a report [here](#).

### Our whistleblowing officers

- Our whistleblowing officers are designated employees who work to uphold the Kambi Group Whistleblowing Policy.

### The People Team

- If you are not comfortable reaching out to your manager, your People Team is always available.
- You can reach out directly to us or email [people.department@kambi.com](mailto:people.department@kambi.com) to reach the entire team.



FIND OUT MORE

Kambi Group  
Whistleblowing Policy

## Non-retaliation policy

We understand that employees who raise concerns about potential violations of our Code may be concerned about retaliation from their colleagues, managers or other employees. We want to assure you that we have a strict non-retaliation policy that protects anyone who raise such concerns. Retaliation against any employee who reports a suspected violation of our Code, cooperates in an investigation or exercises any other right under the Code is strictly prohibited.

Any employee who retaliates against another employee will be subject to disciplinary action, up to and including termination of employment.

We understand that reporting misconduct can be difficult, and we want to assure you that you will be supported by the company. If you are concerned about retaliation, please contact the People Team or our Whistleblowing officers.





# Better

Kambi



## Better – our commitment to compliance

At Kambi, our value Better is all about having relentlessly high standards.

We take pride in our commitment to full compliance with the laws and regulations of the countries in which we operate. We operate with the highest ethical standards and adhere to all applicable laws and regulations in all jurisdictions where we do business. We expect all employees to conduct themselves with integrity and engage in conduct that contributes to a positive public perception of the company. We protect the confidentiality of company information and data and handle all information with care.

## Adhering to applicable laws and regulations

We all must comply with all applicable laws and regulations. We have a comprehensive compliance programme and policies in place to help everyone understand and comply with these laws and regulations. This includes, but is not limited to, Kambi's Insider Trading Policy, Anti-Money Laundering Policy, Anti-Bribery Policy, Gifts and Hospitality Policy, Conflict of Interest Policy and Data Protection Policy.

As we work in the sports betting industry, we all have additional regulations and »

requirements that might be new to you. Make sure you keep these in mind with any private gambling you undertake. For those of you who choose to gamble privately, you must ensure you are doing so in a safe and responsible manner. It is also not permitted to bet on operators powered by Kambi. We have a Personal Betting Standards Policy in place to ensure Kambi helps and protects us all while ensuring that your gambling activity is compliant with Kambi's legal, regulatory and licensing obligations. We offer support for anyone who requires help should a passion turn into an addiction.

Additionally, Kambi is listed on the First North Growth Market at Nasdaq in Stockholm, which means you also need to adhere to Kambi's Insider Trading Policy. Being part of Kambi, we may hold confidential information about our company or our business partners. This insider knowledge gives us an unfair advantage over the public. When we use this knowledge to buy, sell or transfer company stocks or securities, it is called insider trading. This practice is strictly prohibited by law and company policies, and it goes against our principles of fairness and ethical conduct. The policy also prohibits trading during Kambi's defined closed periods. In Kambi's Insider Trader Policy, you will find all the information on the applicable rules and legislations and who to contact when you have questions.

As Kambi is responsible for ensuring we hire trustworthy talent, we utilise backgrounds checks, continuously monitor sensitive »

functions and assign roles in such a way that oversight is built into our processes to secure our business practices. But do not worry about forgetting any of these! All our policies are readily available, and all our teams are more than happy to answer any questions that arise.

### FIND OUT MORE

[Insider Trading Policy](#)

[Anti-Money Laundering Policy  
\("AML Policy"\)](#)

[Kambi Anti-Bribery Policy](#)

[Gift and Hospitality Policy](#)

[Kambi Conflict of Interest Policy](#)

[Data Protection Policy](#)

[Personal Betting Standards Policy](#)

[Background Checks and  
Employee Personal Data Policy](#)

[Sportsbook Operations  
Internal Controls](#)

[Kambi Segregation of Duties  
Sportsbook Operations](#)



## Avoiding conduct that disrupts or jeopardises reputation

In addition to complying with applicable laws and regulations, we also expect everyone to engage in conduct that contributes to a positive public perception of the company. Everyone must therefore avoid conduct that negatively impacts Kambi. This includes, but is not limited to:

- Falsifying or misrepresenting information
- Concealing actual or potential conflicts of interest
- Accepting or offering bribes or kickbacks
- Offering or accepting gifts or hospitality that could influence, or be seen as capable of influencing, the outcome of transactions or decisions relating to our business
- Engaging in discriminatory or harassing behaviour
- Stealing company property or information
- Violating company policies or procedures

## Upholding honesty, fairness and transparency

We are committed to upholding the highest standards of honesty, fairness and transparency in all that we do. We expect everyone to conduct themselves with high standards of professionalism, avoiding any conduct that could be perceived as dishonest, unfair or secretive.

### Honesty

- We expect everyone to be truthful and accurate in their communications, both verbal and written.
- We prohibit any form of misrepresentation or falsification of information.
- We encourage open and honest communication, and we support everyone who speak up if they see something wrong or unethical.

### Fairness

- We treat everyone with respect and fairness, regardless of their position, role or personal characteristics.
- We provide equal opportunities for all employees, and we strive to create a workplace free from discrimination and harassment.
- We make decisions based on merit and we avoid favouritism or nepotism.

### Transparency

- We provide everyone with clear and timely information about company policies, procedures, and performance.
- We encourage open communication and dialogue between employees and managers.
- We are transparent in our dealings with partners, suppliers and other stakeholders.

## FIND OUT MORE

[Kambi Conflict of Interest Policy](#)

[Kambi Anti-Bribery Policy](#)

[Gift and Hospitality Policy](#)

[Equal Opportunities](#)

[Grievance Policy](#)

[Kambi Disciplinary Policy](#)

## Avoiding conflicts of interest and acting in the best interests

Kambi is committed to ensuring that everyone acts in the best interests of the company and its stakeholders. Any conduct or circumstance that could create a conflict of interest or that could be perceived as favouring personal interests over the interests of the company should be immediately disclosed.

### Conflicts of interests

- Everyone must disclose any actual or potential conflicts of interest to their manager or to our legal team (regulatory.compliance@kambi.com) immediately.
- Everyone must avoid situations where their personal interests could conflict with their professional responsibilities.
- No one may use company resources for personal gain.

### Acting in Kambi's best interest

- Everyone must make decisions based on the best interests of the company, its partners and its stakeholders.
- Everyone must avoid any conduct that could damage the reputation or goodwill of the company.
- Everyone must exercise their judgment in a responsible and ethical manner.

Acting in Kambi's best interest does not just apply when on the clock! It applies to media and public events, including, but not limited to, industry awards and trade shows. It is even applicable when you are giving or receiving gifts and hospitality. Make sure you are up to date on Kambi's Media Policy and Kambi's Gift and Hospitality Policy.

### What are some examples of a conflict of interest?

An employee who is responsible for selecting a service provider and one of the companies' biddings is owned by a friend or family member.

An employee has a personal relationship with a co-worker, especially in a supervisory role, which could influence their professional decisions, leading to favouritism or bias.

An employee is using company equipment to run a personal business or running a personal business which is impacting their ability to perform at Kambi.

### FIND OUT MORE

[Kambi Conflict of Interest Policy](#)

[Media Policy](#)

[Gift and Hospitality Policy](#)

## Respecting privacy and security

Kambi is committed to protecting the privacy and confidentiality of all information, including that of our employees, partners and their customers. We handle all personal data with care and comply with all applicable privacy laws and regulations, including the General Data Protection Regulation (GDPR) and fair and lawful processing, and expect everyone to do the same.

### Privacy

- No one may collect, use or disclose personal data without the appropriate authorisation.
- Everyone must protect personal data from unauthorised access, use, modification, disclosure or destruction.
- Everyone must use personal data only for authorised purposes and in accordance with company policies
- Remember! Personal data even covers player data, IP addresses and unique ID numbers.

### Security

- Everyone must follow guidance in respect of the acceptable use of all computer equipment and systems at Kambi.
- No one may disclose confidential information, including, but not limited to, trade secrets, financial information, and partner information to unauthorised individuals or entities.
- Everyone must use confidential information only for authorised purposes and in accordance with company policies.
- Everyone must take reasonable precautions to protect confidential information from unauthorised disclosure.

## Reporting concerns

If you believe that you have witnessed or have knowledge of any potential violations of our privacy and security policies, you are obligated to report it immediately to your manager or to our legal team ([dataprotection@kambi.com](mailto:dataprotection@kambi.com)). All reports will be treated confidentially and will be investigated promptly and thoroughly.

We are committed to creating a culture of compliance where everyone feels empowered to raise concerns without fear of reprisal. By working together, we can ensure that Kambi maintains its reputation for integrity and ethical conduct.

## FIND OUT MORE

[Data Protection Policy](#)

[Kambi Fair Processing Notice](#)

[Kambi Security Awareness  
& Acceptable Usage Policy](#)





# Faster

Kambi



## Faster – our commitment to continuous improvement

Everyone at Kambi strives for continuous improvement and excellence in our work, delivering high-quality products and services that meet or exceed expectations. We are constantly pushing ourselves to deliver superior solutions and services to our partners. We believe in the power of efficiency and agility, delivering projects with speed and precision without compromising quality. We strive to identify and address challenges promptly, streamline processes, and embrace change to optimise our performance and deliver value to our partners.

## Proactive problem-solving and solutions-orientated approach

Everyone is encouraged to take ownership of problems and proactively seek solutions, focusing on identifying root causes and implementing effective remedies. Regular reviews and risk assessments are conducted to anticipate and mitigate potential issues before they escalate. We are all empowered to suggest improvements and innovative solutions to enhance processes and efficiency.

## Streamlining processes for efficient workflow

Routine processes are continuously reviewed and optimised for efficiency and effectiveness. Non-value-added activities are identified and eliminated to streamline workflows. Technology is leveraged to automate tasks, enhance communication and improve overall productivity. Clear and concise communication protocols are established to ensure seamless workflow coordination. Cross-functional collaboration is encouraged to identify and address process bottlenecks and inefficiencies.

## Embracing change and adaptability

We are all encouraged to embrace change and view it as an opportunity for growth and improvement. Open communication and collaboration are fostered to facilitate adaptation and minimise disruption during change processes. Training and development opportunities are provided to equip employees with the skills and knowledge needed to adapt to new processes and technologies. A positive and supportive work environment is cultivated that encourages innovation and experimentation. Kambi encourages all to share their insight and perspectives to inform change decisions and ensure alignment with company goals.

## How does our value Faster bring Kambi closer to our Mission and Vision?

### Proactive problem-solving

Nip problems in the bud and prevent escalation

### Streamlining processes

Maximise our efficacy and free up time for value-adding tasks

### Embracing change

Stay ahead of the curve and deliver the best to our partners



# Together

Kambi

## Together – our commitment to one another

We believe that our people are our greatest asset. We all uphold Kambi's values of diversity, inclusion and respect, fostering a welcoming and inclusive workplace for everyone. We understand the importance of empowering each other to feel like we belong, are free to be our authentic selves and are committed to equality of opportunity through all our processes regardless of what makes you unique!

## A company where respect and dignity prevail

At Kambi, we foster a culture of mutual respect and dignity, where everyone is entitled to work in an environment free from harassment, bullying and discrimination. Any form of misconduct that undermines the well-being and safety of our employees will not be tolerated. »

Harassment, bullying and discrimination can manifest in various ways, including:

- Unwelcome remarks, gestures or physical contact
- Displaying or circulating offensive, derogatory, or sexually explicit material, including via email or online
- Making offensive or derogatory jokes or comments
- Subjecting others to verbal or physical abuse or threats

If you witness or experience any form of harassment, bullying or discrimination, please report it immediately to your manager or contact your People team. Kambi's Disciplinary Policy is designed to help encourage everyone to achieve and maintain our standards of conduct and ensure we are consistent and fair in all that we do. We are committed to creating a workplace where we all feel valued, respected and protected.

### FIND OUT MORE

[Equal Opportunities](#)

[Grievance Policy](#)

[Kambi Disciplinary Policy](#)



## Cultivating an inclusive culture where diversity thrives

Kambi is deeply committed to fostering an inclusive environment where individuals from all walks of life are valued, respected and empowered to contribute their unique abilities and perspectives. We recognise and embrace the diversity of our partners, suppliers and communities as a strategic advantage that drives innovation, creativity and business growth.

As we expand our global footprint, embedding diversity across all aspects of our operations – from collaborative work practices to supplier relationships – is essential for our long-term success. We strive to create a workplace where everyone feels included, respected and empowered to reach their full potential.

Our ultimate goal is to become one of the most inclusive companies globally, working towards a world where everyone can thrive and contribute to a more equitable, accessible and harmonious society.

## Our commitment and approach to corporate social responsibility

We recognise that we have a responsibility to the next generations to identify and limit areas where our operations may have a detrimental impact on the environment. Being predominantly digital, Kambi's products and services create growth and opportunities with an extremely low impact in relation to resource consumption and harmful emissions. We rightly strive to do more to further reduce our carbon footprint from this already low base.

Our core sustainability values are built upon Governance, Technology and Talent.

### Safeguarding through sustainable governance

- Kambi works closely with regulators based on the highest ethical standards to promote industry best practice, alongside the leading role we play in protecting the integrity of sports.

### Technology

- To offer the industry's most advanced, reliable and competitive product, providing a secure sportsbook for our partners and a safe, fair and exciting experience for end users.

### Talent

- To provide an inclusive environment in our offices around the world where talent, independent of background and demographic, can develop and thrive.



## Conducting with professionalism and courtesy in all interactions

Professionalism and courtesy are cornerstones of our company's culture, shaping our interactions with colleagues, partners and all stakeholders. By upholding these principles, we foster a positive and respectful work environment that reflects our values and contributes to our success.

Professionalism encompasses a range of behaviours that reflect competence, integrity and ethical conduct. It manifests in our ability to communicate clearly, concisely, and professionally across all channels while maintaining a positive and helpful attitude that appreciates the contributions of others. »

Courtesy extends beyond professionalism, emphasising the importance of treating others with empathy, understanding and respect. It manifests in our attentiveness and responsiveness to the needs of others, patience and composure in challenging situations, avoidance of discriminatory or offensive language, respect for different opinions and perspectives, and genuine appreciation for the efforts of our colleagues and partners.

## How do professionalism and courtesy bring us Together as one culture

They strengthen the relationships we have with one another and our partners

They reduce conflict and create increased opportunities for success

They lead to enhanced employee morale

## Hybrid working and setting up our teams for success

Hybrid work at Kambi aims to provide clarity and flexibility around our new ways of working together as one Kambi team. It is based around trust and self-ownership. By creating a balance between office work and working from home we believe we all will gain from the best of both worlds.

We believe that to strengthen the Kambi team we need to regularly meet and exchange both in person and virtually. It is while connecting, networking and collaborating that we find mutual ground and innovative ideas that drive our business forward.

Eligibility for hybrid working varies depending on role, teams and local regulations but, as a guideline, we expect employees to work from the office a minimum of two days per week, with our offices open for those who want to be there more often!

**FIND OUT MORE**

[Hybrid Working Policy](#)

## Our hybrid working principle

### We play as a team

- We care about each other and make sure everyone feels included and part of a team

### We rely on trust and self-ownership

- We trust you find ways of working that suit your team, your stakeholders, and your own working style

### The office is our arena

- The office is where we meet, collaborate, share our knowledge, onboard new team members, build relationships, and make critical decisions

### We will continue to evolve

- We constantly challenge the way we work to improve ourselves at Kambi

## Workplace health and safety

We believe that safety is a shared responsibility and that everyone has a role to play in preventing injuries and illnesses. We ensure workplace health and safety through policies, procedures, safety committees, and making training available to everyone at Kambi on a regular basis.

How do you play a part in health and safety? We all need to hold ourselves accountable to follow all safety rules and procedures, use safety equipment as required, report any unsafe conditions or hazards to your manager immediately, cooperate with safety and health inspections and training, and adopt a safe and responsible work attitude.



# Thank you for reading and welcome to Kambi!

We appreciate your commitment to upholding our Code and creating a positive and productive work environment for all. By following these standards, we can ensure that Kambi remains a successful and respected organisation for years to come.

Please remember that your cooperation is essential in maintaining a safe and ethical workplace. Any breaches of our Code of Conduct, policies, or procedures will lead to appropriate disciplinary measures in accordance with Kambi's Disciplinary Policy, up to and including termination of employment.

If you have any questions or concerns regarding the Code of Conduct, please do not hesitate to contact your manager or Kambi's People Team.

**Thank you for playing a pivotal role in making Kambi  
Better, Faster, Together!**

**Better**



**Faster**



**Together**



**FIND OUT MORE**

Kambi Disciplinary Policy

Signature, acknowledging that you have read,  
understood and commit to the code of conduct.

Place

Date

Signature

Full Name