

CODE OF CONDUCT

ISSUE 2 | Q3 2023

Our conduct:

We do our best for
everyone, inside and
outside the business





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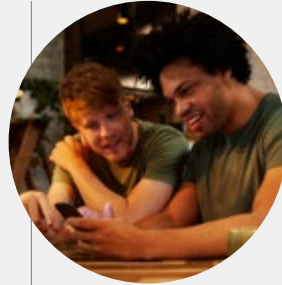


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A message from Rachel



Here at Kindred, we have a hugely diverse and talented team, who I'm proud to work with every day. Our community is what makes Kindred, and individually we all contribute to the great culture we all enjoy here. Together, we are creating an exciting experience for our customers, a supportive and dedicated working environment for our colleagues, and strong relationships with our partners and communities.

We make sure we walk the walk – compliance is our keystone, and we build from there. Our purpose unites us with one vision: **to transform gambling by being a trusted source of entertainment that contributes positively to society.** In our everyday work, this means we must ensure we behave ethically and responsibly – and use our voices to speak up when something is wrong.

The Kindred Code of Conduct is a valuable tool that each of us uses to live up to our purpose. We each have an important role to play, ranging from how we interact with one another, to ensuring the safety of our customers. It is on all of us to create a business and industry that we are proud of – delivering ethical, sustainable, and trusted entertainment to our customers – and enjoying the process with our colleagues.

Rachel Randle-Williams

Chief HR Officer

“We have a hugely diverse and talented team, who I'm proud to work with every day.”

OUR UNIFYING PURPOSE

[Read more on the next page](#)



Our purpose unites us

Kindred Group is committed to delivering a thrilling, safe and secure experience to our 30 million customers, who put their trust in us every time they use our products. Underlying that commitment is a deeper purpose that guides our decisions, our investments in the future, and our global policies.

To transform gambling by being a trusted source of entertainment that contributes positively to society.

This purpose also helps us set an even higher bar for our day to day conduct, helping us act decisively by providing a 'north star' that guides us onto the right path. When you're not sure what

to do, ask yourself: will this action help us transform gambling (in big or small ways)? Is this behaviour building trust? Are we contributing positively wherever we can?

It not only affects our performance, but also influences our industry at large to make a positive impact.

**TO TRANSFORM GAMBLING
BY BEING A TRUSTED SOURCE
OF ENTERTAINMENT**

**THAT CONTRIBUTES
POSITIVELY TO SOCIETY.**



Our purpose unites us

continued

THROUGH OUR CONDUCT, EACH OF US DEMONSTRATES:

1

The power to transform

Together, we can make a real difference by building a sustainable company, supporting a diverse culture and driving fundamental changes throughout our industry. In doing so, we're changing the way people perceive our industry. Whether it's treating our teammates with respect, helping a customer enjoy their gaming experience, making a partner feel valued or engaging with our community, transformation is powered by you, every day.

2

The credibility to win trust

Compliance is vital to our business, but it is only part of what makes us trustworthy. Ethical behaviour brings our purpose and values to life in tangible ways, earning trust by doing the right thing. From detecting unhealthy gaming patterns to celebrating diversity within our teams, it's important that we demonstrate our integrity through our actions, showing everyone who we are and what we stand for.

3

The capability to contribute

We must lead by example and behave responsibly, using our authority and influence to drive real change across our industry. Supporting our colleagues and partners, looking after the health and wellbeing of our customers and communities, seeking out opportunities to make a positive impact – each of us is capable of building a better future, if we're equipped with the knowledge and tools to make the right decisions.



We are all Kindred Spirits

THE OUTSTANDING AND SUPPORTIVE ENVIRONMENT

THAT MAKES US WHO WE ARE

“People around me are always encouraging me to put forward new ideas and include me in the decision making.”

Kindred team member

‘Being Kindred’ is about being part of a community that thrives in an atmosphere of progress, diversity and mutual respect. We are a values-led team with a strong culture built by dedicated employees from diverse backgrounds. We all strongly identify with our values, each playing a leading role in creating a thriving culture. We believe in personal responsibility and a flexible working environment where we empower each other.

Our shared values help us maintain and nourish our remarkable culture, helping us easily identify what is, and isn't, Kindred spirit. Our values determine our strategy and inform every aspect of our conduct, from the most basic interaction to the most complex compliance question.



We are all Kindred Spirits

continued

OUR VALUES INSPIRE US



We are individuals united

We are a diverse network of passionate and talented individuals who are proud to be part of Kindred. As experts in our different areas, we all add something special to the Company. Our success depends on attracting and keeping the best talent who recognise the importance of being a part of a winning team.



We dare to challenge

We see all challenges as an opportunity to do something in a better way – for you, for the team and for our customers. We hunger for growth both personally and professionally and go above and beyond to deliver the successful products of tomorrow. Only through acting now and taking calculated risks will we stay one step ahead of the competition.



We build on trust

Our success is built on trust. We trust each other to deliver on our promises. We believe in empowerment and we are all trusted to make the right choices for Kindred and our customers. We behave with integrity and fairness in everything we do and because of this we are trusted by our customers, the regulators and the industry as a whole.



We seek to innovate

We foster an environment where initiative and innovation are rewarded. We combine our skill and experience with novel thinking to spot new trends and tools to improve our customers' experiences. We regard failure as a stepping stone to success. We listen, we learn and we adapt.



We believe in friendship

We believe in humility and have a genuine interest in our colleagues. We believe that being friendly is more than an attitude; it's a way of working. We enjoy what we do, and it shows. It's infectious and builds relationships that last, and friendships that grow. Through friendship comes trust, and through trust comes loyalty – the key to our business.



Introducing the Kindred Code of Conduct

WHAT IS A CODE OF CONDUCT?



In a nutshell, this code outlines the ethical, regulatory and legal requirements for conduct that apply to everyone in the business everywhere in the world, including senior management and our Board of Directors.

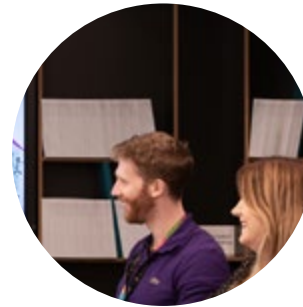
It contains guidance covering how we behave with each other, our customers, our partners and our communities, ensuring that we always **do our best** to make everyone feel supported, included and respected.

Kindred operates globally, therefore there are rules and regulations to take into consideration. The Group follows the laws of the countries that it operates in. This code represents the minimum requirement, and if there are stricter stipulations in local markets where we operate, these will take precedence. Where relevant, this code refers to more detailed policies at corporate and/or local level.



Introducing the Kindred Code of Conduct

continued



Our conduct shows the world what we stand for, reflecting our people-positive values and supporting our purpose through every decision we make.

The Kindred Code of Conduct ensures that we are all aligned in our actions and behaviours across the business, and it promotes accountability at all levels of seniority.

It also publicly signals our commitment and determination to make a positive contribution to society through our actions, individually and collectively. We hope that our conduct will lead the entire industry towards a more sustainable future.

WHY DO WE NEED

A CODE OF CONDUCT?



Introducing the Kindred Code of Conduct

continued

HOW TO USE OUR CODE OF CONDUCT

A 'quick guide' resource: The code covers important principles and provides employees with essential guidance on how to treat colleagues, customers, suppliers and their communities with integrity and respect.

A tool for identifying actions or behaviours that may be unethical or noncompliant: you must report any suspected misconduct to your line manager, a member of the People Team, or using the Speak Up platform, depending on the situation.

It is every Kindred team member's responsibility to read, acknowledge, and comply with the code.

A TOOL FOR IDENTIFYING ACTIONS OR BEHAVIOURS THAT MAY BE UNETHICAL OR NONCOMPLIANT

[Read more about our Speak Up platform here](#)





Introducing the Kindred Code of Conduct

continued

The Kindred Code of Conduct is not a definitive list of rules and policies. It is a guide designed to help all of us make the right decisions, and there are handy links to additional resources throughout, in case you need more information. You can also find them [here](#).

If you can't find what you're looking for, ask your line manager. In situations where that isn't possible, reach out to your People Team representative.

This code is not a contract, but every employee must comply as part of our conditions of employment. Failure to do so may result in disciplinary action, dismissal, or legal action.

**WHAT'S
NOT IN HERE**





DO OUR BEST FOR EACH OTHER



It's up to all of us to do our best – for each other, for our customers, for our partners, and for our communities.

- ▶ **Being part of the Kindred team**
- ▶ **Our role as a business: Engaged and proactive employer**
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Being part of the Kindred team

WE BELIEVE IN FRIENDSHIP, WORKING TOGETHER

TO DRIVE

POSITIVE CHANGE

“Our purpose feels authentic, we’ve always had something similar. We’ve always positioned ourselves as responsible adults.”

Kindred team member



We are a values-led global team with a strong culture, supported and nourished by dedicated employees from diverse backgrounds. Working together to move an entire global industry forward and push back on preconceptions, we’re not satisfied with minimum requirements and status quo – instead we strive to lead the way and have a positive impact.

Our employees strongly identify with our values, and they play a leading role in creating the ground-breaking culture necessary for us to achieve our purpose.

Kindred’s long-term success is all down to our employees. As we continue to evolve and grow, it’s vital that we attract and retain the best people to support and drive our sustainability commitments.



Our role as a business: Engaged and proactive employer



We are a global company operating a diverse range of products across multiple markets and with employees based in several offices worldwide. No matter how much we grow, Kindred is committed to prioritising employee engagement and promoting career progression. Management at all levels welcomes honest and open feedback and is committed to making changes for the better.

To set up every employee for success, we've instituted policies and practices in a range of areas which ensure that all of us are safe, supported and equipped to make good decisions in any situation.

Policies in this section

- Health, safety, & wellbeing
- Diversity, equity, & inclusion
- Opportunities for all
- Zero tolerance of victimisation
- Privacy & data protection
- Hybrid working

CREATING A CULTURE OF

TRUST, FRIENDSHIP

AND PRIDE IN OUR WORK



Our role as a business: Engaged and proactive employer

Our policies

HEALTH, SAFETY & WELLBEING

Kindred provides a safe, clean and comfortable working environment that promotes wellbeing, collaboration and proper work performance for our employees, in addition to compliance with applicable labour laws, regulations and occupational health and safety laws.

ZERO TOLERANCE OF VICTIMISATION

We proactively prevent workplace abuse of any kind, through policies as well as trainings, vigilant management and strict enforcement. We do not tolerate discrimination, harassment, bullying or other forms of victimisation.

DIVERSITY, EQUITY & INCLUSION

We incorporate equity and diversity standards in all day to day operations and throughout all aspects of employment. We know that diversity is integral to our success, and we're proud of the inclusive culture we create together as individuals united.

PRIVACY & DATA PROTECTION

We are committed to becoming a leader in trust, integrity and player safety by applying strict data protection standards, and continuously reviewing and optimizing our processes to make our services safer and more reliable. We respect the privacy and confidentiality of our customers, our staff, shareholders, and business partners. For this reason, we strive to live up to or exceed the regulatory standards, including the standards on privacy and data protection.

OPPORTUNITIES FOR ALL

We are committed to building and upholding an inclusive, hybrid workplace where every individual is valued and has similar access to working conditions, compensation and benefits, as well as possibilities and career opportunities, regardless of age, disability, ethnicity, gender, nationality, religion or other belief system, sexual orientation, or transgender identity or expression.

HYBRID WORKING

We're excited to offer employees flexibility and the tools to help drive collaboration for our employees. With flexible working* and detached working** capabilities, our teams have a wide range of options to tailor their approaches. Managers are responsible for agreeing with their team members on what work they can do remotely and what needs to be done at the office. The decision on the best working environment for you and for Kindred will depend on your role, daily activities, how your team works together, and local rules regarding where employees may work from.



Download our **Hybrid Working Guide** to find out more

* Flexible working – mix of home and office, non-traditional working hours

** Detached working – working from a remote location



Every employee is integral to our team and our culture

**WE ARE
INDIVIDUALS
UNITED, WITH
UNIQUE TALENTS
AND SKILLS**

TOGETHER WE CAN

MOVE MOUNTAINS

Policies in this section

- › Values & ethical behaviour
- › Accountability
- › Conflicts of interest
- › Favouritism
- › Disclosure
- › Compliance

Kindred employees are encouraged to drive change and challenge how things are done. We share knowledge and best practices across departments and country borders, which supports our teams in learning from each other and gives them experience working in new groups and geographical locations.

To set up every employee, at every level, for success, we've instituted policies and practices in a range of areas which ensure that all of us are safe, supported and equipped to make good decisions in any situation.



Every employee is integral to our team and our culture

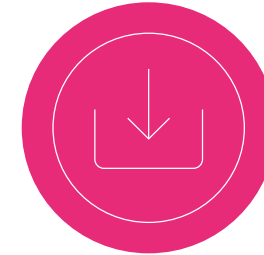
Our policies

VALUES & ETHICAL BEHAVIOUR

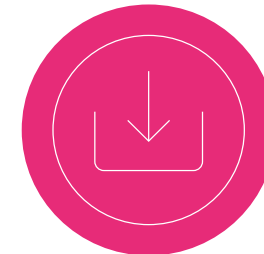
Every employee must avoid any behaviour that is unlawful or clearly unethical and/or inappropriate. Such behaviour can involve, but is not limited to, fraud, misuse of company assets and corruption in all its forms, including extortion, bribery, money laundering or terrorist financing. No such illegal activity is tolerated either in action or as negligence.

Everyone must participate in regular anti-money laundering (AML) training, and we provide further training targeted to those groups who are tasked with detecting and preventing money laundering.

We expect full compliance with connected policies such as the [Kindred Bribery Policy](#) and the [Kindred Anti-Money Laundering Policy](#).



Read our [Kindred Bribery Policy](#)



Read our [Anti-Money Laundering Policy](#)

“ I have never experienced such a family. If you put the work in, they will help you out.”

Kindred team member





Every employee is integral to our team and our culture

Our policies

ACCOUNTABILITY

We are each accountable for performing our roles in a professional manner, with integrity and fairness, treating our colleagues with respect and acting in the spirit of friendship.

We take personal responsibility at all times to promote an equally inclusive and safe working environment free from any kind of discrimination or harassment.

CONFLICTS OF INTEREST

Employees must avoid any personal, financial or other interest (whether related to you or any individual or entity closely associated with you) which may be in conflict with your duties and responsibilities towards Kindred.

FAVOURITISM

Employees cannot enter into or promote any contractual relationship between Kindred and an individual or closely associated entity without first having:

- › informed Kindred about one's relationship with the contracting party; and
- › received a written approval to defer to this standard from one's line manager.

DISCLOSURE

We do not disclose company information or information obtained through employment other than in the proper course of work. Learn more about [our disclosure and insider trading policies here](#).

COMPLIANCE

Every employee must act within applicable laws and regulations as well as Kindred's values and ways of conducting business. As a global Group operating in regulated markets, we need licences and appropriate authorisations to operate. Compliance is a prerequisite for our business, and we are subject to strict rules and provisions in the countries where we hold licences. All employees in Kindred take responsibility for compliance topics, and we have an [Compliance training programme](#) and [compliance framework](#).

Comply with the anti-bribery and anti-corruption requirements set out in [Kindred's bribery policy](#).



“ I really like my team and I think I am learning a lot.”

Kindred team member



Top tips

1

YOU WON'T GO WRONG IF YOU BUILD ON TRUST

Together, we can achieve our purpose if we trust one another. The very things that make us different, our unique talents and skills, make it possible for us to progress, transform our industry and change public perception. Trust each other, and make it happen. [Learn more about our culture of trust here.](#)

2

DON'T BE AFRAID TO CHALLENGE YOURSELF AND YOUR TEAM

We see all challenges as opportunities, and as a company we encourage every employee to challenge the business, themselves and each other to do better. Our diverse backgrounds and skills help us identify challenges with different perspectives. Only if we dare to challenge can we drive the change we want to see.

3

IF YOU NEED SUPPORT, TALK TO YOUR LINE MANAGER

Whether it's a change in your career path or a personal issue affecting your work, your line manager is on your side, there to help you overcome obstacles and find solutions in the Kindred spirit of trust and friendship.



Conduct in action

That's how many new hires experience the warm, friendly Kindred culture that we create every day, whether they are in the office or working remotely. Here's how we can sure that everyone who joins the team has that same great experience:



Onboard with a smile

Online courses and remote working make it possible for a new employee to start working with very little human interaction. It's more important than ever that new employees see their managers, even if it's on a video call, so they can put a face to the process and feel like they can reach out with any issues or challenges.

Take time with the team

Make new team members feel welcome by taking the time to meet them outside of regular work interactions and incorporate a team-building activity to break the ice. If in-person gatherings are impossible, set aside time for a video-social at the end of the day.

“ I have never experienced such a family. If you put the work in, they will help you out.”

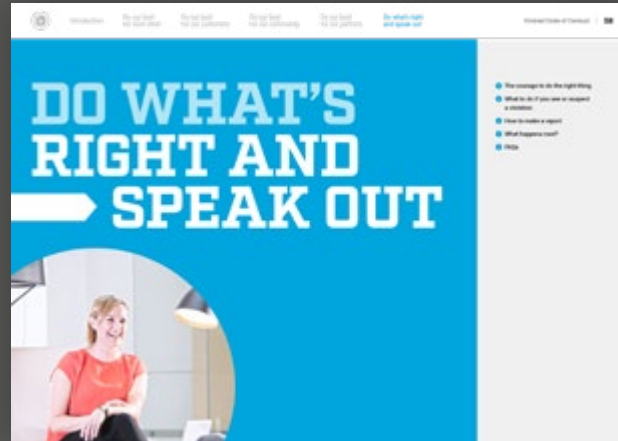
“ From day one, I felt welcomed, supported and valued.”



Reporting

Kindred operates under the approach: 'If we see something, we say something.' Your report is confidential and you will never be penalised for reporting a concern in good faith.

Report suspected breaches of the code or other concerns to your line manager. If that's not possible, contact your People Partner or report through our [Speak Up Page](#).



[See the section on reporting for more details.](#)



Access our Speak Up portal [here](#)



DO OUR BEST FOR OUR CUSTOMERS



We go above and beyond to ensure that the industry changes for the better

- › **Making gambling 100 per cent enjoyable**
- › **Our role as a business: Deliver a thrilling, safe & satisfying experience**
- › Honesty in sports
- › Responsible Gambling & our Zero Harm goal
- › Problematic behaviour
- › Helping customers stay in control
- › Cyber security
- › **Every employee plays a part in reaching our Zero Harm goal**
- › Staying up to date on company policy
- › Being vigilant and speaking up
- › **Top tips**
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- › **Reporting**



Making gambling 100 per cent enjoyable



Gambling should only ever be entertainment. The majority of customers enjoy our offering in sports betting, casino and games in the way it is intended – around 98 per cent do so for fun.

However, this means that a small percentage of our customers do not use our products in the way they are intended. For those customers, gambling can harm their physical, psychological, emotional and financial health and possibly affect the lives of their friends and family.

Kindred has a proven track record for innovating to promote responsible gambling. We take our role as an industry leader in this crucial area very seriously, because gambling can't be 100 per cent enjoyable until there is Zero Harm.

Did you know?

around

98%

of our customers enjoy our offerings for fun

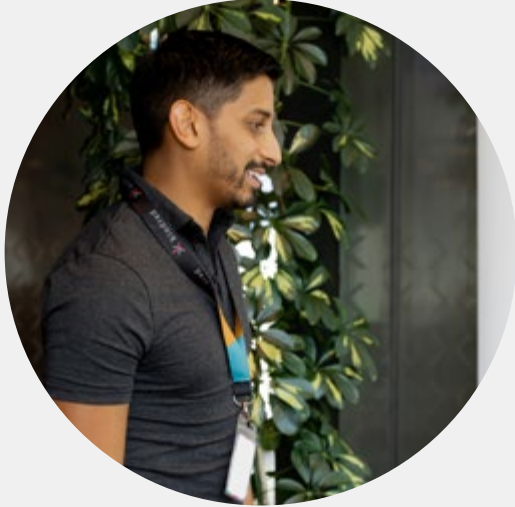
BUILDING TRUST THROUGH

DEDICATION AND INNOVATION





Our role as a business: Deliver a thrilling, safe & satisfying experience



Policies in this section

- › Honesty in sports
- › Responsible Gambling & our Zero Harm goal
- › Problematic behaviour
- › Helping customers stay in control
- › Cyber security

Having a positive impact on people's lives is vitally important to all of us at Kindred. Our goal is to entertain our customers with a superior experience and keep them safe with industry-leading protocols in place to reduce harmful behaviour. We won't stop until we have reached our goal of Zero Harm.

We know that you can't build trust without transparency, and you can't do it alone. We're proud to be the first gambling operator that will share the percentage revenue coming from harmful gambling. We're also sharing our state-of-the-art problematic behaviour detection technology with our competitors and anyone in the industry who wants to join us in our mission to change hearts and minds, and establish gambling as a credible, fun and safe form of entertainment.

WE DARE TO CHALLENGE PERCEPTIONS OF OUR INDUSTRY

AND BUILD CUSTOMER TRUST



Our role as a business: Deliver a thrilling, safe & satisfying experience

Our policies

HONESTY IN SPORTS

We monitor all placed bets and continuously collect information and knowledge to develop intelligence about potentially corrupt betting activity. We have joined the fight against match-fixing.

We see match-fixing as a threat to society as a whole. Sport is the largest global entertainment industry, and billions of people around the world enjoy it. Its popularity is partly driven by the unpredictable nature of the outcome. Taking the unpredictability away by fixing the outcome puts the nature of sport in

jeopardy. We act side by side with local authorities, policy-makers, cyber security, law enforcement agencies and sports federations to eliminate attempts to pollute sport with criminal activity. As a sports betting provider, our contribution lies in performing thorough ID controls on customers and monitoring every deposit, withdrawal and game.

Fixed events are also a threat to our industry. If people lose faith in the honesty of a sports event, they will lose faith in our betting product as well.





Our role as a business: Deliver a thrilling, safe & satisfying experience

Our policies

RESPONSIBLE GAMBLING

We fully acknowledge and embrace our responsibilities as a gambling operator. We want all our customers to enjoy gambling as a form of entertainment and we are committed to do all that we reasonably can to prevent and minimise harm caused by gambling.

By working together across gambling operators, regulators, treatment centres, reformed problem gamblers, researchers and other partners, we can move towards an industry that offers customers true entertainment. As part of our vision to make gambling 100 per cent enjoyable, we have set an ambition to reach zero revenue derived from harmful gambling by 2023.

PROBLEMATIC BEHAVIOUR

Kindred continues to lead the industry in detecting and preventing problematic gambling behaviours. We have invested heavily in developing technologies to detect and prevent these behaviours for more than two decades. We use our knowledge to create a digital fingerprint of our customers' behaviour. This fingerprint allows us to monitor, detect and follow up on problematic activities, and provide targeted customer protection, which is a central part of building a safe and responsible gambling environment.

We have applied empirical research to develop a method for detecting early signs of problem gambling behaviour among our customers. Our detection system [PS-EDS \(Player Safety – Early Detection System\)](#) is a major pillar in Kindred's sustainable gambling approach. More information can be found in the [Responsible Gambling Policy](#).

Did you know?

As part of our vision to make gambling

100%

enjoyable, we have set an ambition to reach

Zero

revenue derived from harmful gambling by 2023





Our role as a business: Deliver a thrilling, safe & satisfying experience

Our policies

HELPING CUSTOMERS STAY IN CONTROL

We execute a rigorous process for detecting the early warning signs of problematic behaviour, so that our customers can enjoy gambling without risk of unhealthy outcomes. Our approach combines cutting edge technology and industry-leading customer service staff training to identify, flag and address problematic behaviour quickly and accurately.

If a customer starts to show signs and is detected by PS-EDS, an automated notification is sent to our Responsible Gambling team. Our team builds a customer profile and advises on the most suitable Responsible

Gambling messages and tools to help them stay in control. We proactively reach out to the customer and advise them on steps that can be taken for safer play through information and promotion of Responsible Gambling tools.

We invest in research to understand what makes a Responsible Gambling tool efficient in helping our customers, and we continuously develop a range of control tools. Tracking the share of detected customers changing behaviour after intervention is part of our commitment to transparency – have a look at our most recent stats and [follow our journey towards zero here](#).

CYBER SECURITY

We operate on a proprietary technology platform giving us the flexibility, scalability and stability necessary to continue to grow as a business. Our platform handles millions of transactions daily, making cyber security one of our top priority areas.

As a gambling operator holding funds for our customers, we always strive to have the highest security standards in place, and we work proactively to protect our customers from having their accounts compromised or suffering any other data integrity abuse.

Did you know?

In 2019

11.5%

of our customers
used one or more of
our non-mandatory
tools





Every employee plays a part in reaching our Zero Harm goal

“We go above and beyond to ensure that the industry changes for the better.”

Kindred team member

TRANSFORMING OUR INDUSTRY AND CHANGING PUBLIC PERCEPTIONS OF GAMBLING

At Kindred, we are all fully committed to the safety and enjoyment of our customers. Whether your role is consumer-facing or not, your contribution to our culture of positive impact makes it possible for us to give our customers the great, safe experience they're looking for.

Zero Harm also impacts the way people perceive our industry. As we continue to make our products safer and more sustainable, we also change public perceptions of gambling as a thrilling and enjoyable form of entertainment.

Policies in this section

- Staying up to date on company policy
- Being vigilant and speaking up

TAKES TEAMWORK



Every employee plays a part in reaching our Zero Harm goal

Our policies



STAYING UP TO DATE ON COMPANY POLICY

Review the [Kindred Zero Harm policy](#) and be sure you understand your responsibilities in this area. Some of our teams have a more active part to play in keeping our customers safe. If you're unsure, ask your line manager.



BEING VIGILANT AND SPEAKING UP

Report any suspected problematic behaviour to your line manager immediately. No matter what part of the business you work in, it's our collective responsibility to say something when we see the signs. The only way to reach Zero Harm is to work together, united with a common goal.





Top tips

1

NEVER STOP INNOVATING TO ENSURE THAT ALL OF OUR CUSTOMERS ARE SAFELY ENJOYING THEIR EXPERIENCES

Together, we can achieve our purpose if we trust one another. The very things that make us different, our unique talents and skills, make it possible for us to progress, transform our industry and change public perception. Trust each other, and make it happen. [Learn more about our culture of trust here.](#)

2

UNDERSTAND THAT THE CUSTOMER ISN'T ALWAYS RIGHT WHEN IT COMES TO THEIR SAFETY

While most people can make an informed adult choice and enjoy gambling as a form of entertainment, a small minority of customers may encounter issues that require greater attention from us. Our customers' enjoyment of our products is very important to us, but their safety is paramount. Any and all suspected harmful behaviour must be investigated and appropriate actions taken to keep our customers safe. [Click here to learn more about the steps we take to promote Responsible Gambling.](#)



Conduct in action

DID YOU KNOW THAT EVERY CASE OF POTENTIALLY HARMFUL BEHAVIOUR IS ASSESSED BY A HUMAN BEING?

As a trusted source of entertainment, we know that the safety of players is paramount. The trust our customers place in us is an honour and a responsibility that we take very seriously. That's why we empower our customer-facing teams to follow up on any cases they think warrant a closer look, whether that means escalating it to the right level or working with the customer to resolve their issue. We're proud of our detection technology, but it's our people who make the call.



How a case is assessed:

1

We monitor all customers' behaviour with our Player Safety – Early Detection System (PS-EDS)

2

We detect early signs of problematic gambling behaviour based on a number of criteria build on research

3

Depending on the identified behaviour, our system will send an automated message, or

4

Our Responsible Gambling team builds a profile of the customer and advises on the most suitable RG message and tools to help our customers stay in control

5

The team reaches out to the customer with a personalised and targeted message advising the customer

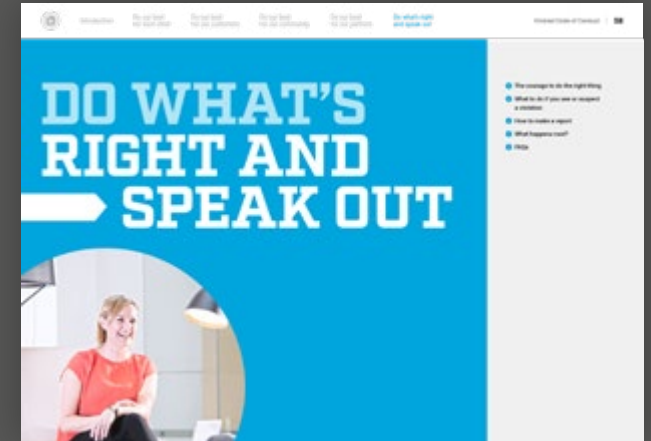


Reporting

Creating a culture of Responsible Gambling is the responsibility of all of us, and one of the key ways we support our Zero Harm goal is by reporting any suspected harmful behaviours. Your report is confidential and you will never be penalised for reporting a concern in good faith.

Report suspected breaches of the code or other concerns to your line manager. If that's not possible, contact a member of the People Team or report through our [Speak Up](#) page.

When it comes to match-fixing, Kindred is responsible for reporting to external parties. If suspicious betting activity is discovered, it's reported along three lines. Firstly, we always report to the relevant regulator. Secondly, we report to relevant sport governing bodies. Thirdly, we report to the International Betting Integrity Association (IBIA), the integrity body of the regulated European betting industry consisting of 25 members, of which Kindred is a founding member. IBIA can conduct an investigation throughout the whole market and also report its aggregated findings to both regulators and sports governing bodies.



[See the section on reporting for more details.](#)



Access our Speak Up portal [here](#)



DO OUR BEST FOR OUR COMMUNITIES

- › Building a better future
- › Our role as a business:
Make an impact & share
best practice
- › Combating climate change
- › Every employee can do something
that makes a real difference
- › Individuals united in support
of our communities
- › Community outreach
- › Making the most of our skills
to support our communities
- › Top tips
- › Conduct in action





Building a better future

OUR SPIRIT OF FRIENDSHIP

Engaging with the communities around us provides the most direct path to contributing positively to society, and it is key to our sustainability goals.

Our long-term ambition is to equip our communities with the knowledge and resources to build a better future. We do so by engaging in meaningful partnerships with local and global organisations.

We are increasing our social engagement through additional partnerships and active sponsorships and are working towards procuring 100 per cent of our purchased energy from renewable resources by 2023.

Did you know?

we are working towards procuring

100%

of our purchased energy from renewable resources by 2023

EXTENDS TO THE

COMMUNITIES AROUND US





Our role as a business: Make an impact & share best practice



CONTRIBUTING TO ECONOMIC GROWTH & STABILITY



As one of the largest gambling operators in the world we make an important contribution to sustainable economic growth in a variety of ways:

- › Generating government revenues through the taxes we pay.
- › Stimulating economic growth through higher production and a focus on innovation.
- › Creating and supporting thousands of jobs globally through direct and indirect employment.
- › Upskilling our employees, which increases their earning potential and tax contributions.



Our role as a business: Make an impact & share best practice

Our policies



COMBATING CLIMATE CHANGE

As a company operating solely online, our climate impact mainly comes from energy usage and business travel. While our operations continue to grow, we aim to promote sound greenhouse gas reduction practices and environmental awareness in our business.

We are committed to transparency as a vital part of our Sustainability strategy. Therefore, we calculate and report our Group's annual CO₂e emissions.

OUR OBJECTIVE

To continue to reduce our emissions per employee.

OUR AMBITION

To procure 100% of our electricity from renewable sources of energy by 2023.





Every employee can do something that makes a real difference

Our policies

INDIVIDUALS UNITED IN SUPPORT OF OUR COMMUNITIES

We know it's not always easy to find time for volunteering. That's why every employee can take three extra paid days of leave per year to work for a local charity, and we hope that we can get 100 per cent of our team to give their time for a good cause.

You're free to choose a charity to work with as long as it meets the criteria outlined on page 40, but we encourage everyone to put their expertise to good use. For example, we organise larger collaborations to deliver teaching programmes so that our employees can share their knowledge.

COMMUNITY OUTREACH

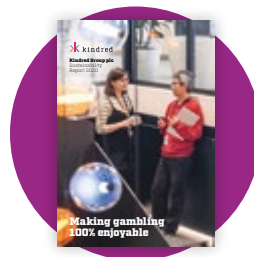
Our local market teams and brands undertake a variety of initiatives to support their local community, ranging from funding local sports clubs, commissioning research into areas such as responsible gambling and mental health, to organising beach clean-ups and setting up rooftop beehives. Learn more about these activities in our [Sustainability Report](#).

We are proud to be global Community Partner to the European Football for Development Network (EFDN), a CSR network of more than 70 football clubs that works to change lives through football.

MAKING THE MOST OF OUR SKILLS TO SUPPORT OUR COMMUNITIES

We want to be an active participant in our local communities, and we are committed to giving back through sponsorships, and by sharing our knowledge and experience where we can add value.

Kindred also empowers employees to take action individually. Everyone receives three extra paid days of leave per year to work for a local charity, and we aim to continually increase the number of employees who use their days by helping them find the right initiatives for their skills and personal interests.



Read our **Kindred Sustainability Report**



Top tips

1

PUT YOUR SPECIFIC SKILLS AND KNOWLEDGE TO GOOD USE

As a knowledge-heavy organisation with an incredibly talented workforce, there's a lot we can do to lift up our communities and support local charities. Take some time to think about how your unique skills and experience can make the most impact, whether it's mentoring or carpentry – it's your gift to give.

2

GET EVERYONE INVOLVED!

If we're going to reach our goal of 100 per cent employee uptake, we need to encourage each other to step up. For many of us, it's easier (and more fun) to take action as a team. Try coordinating group activities, participating in wider Kindred-driven activities or volunteering at a community centre with a friend from work – you're more likely to do it if you're not doing it alone!



Conduct in action

MAKING A DIFFERENCE IN YOUR COMMUNITY – HOW TO CHOOSE YOUR CHARITY

We want every employee to find a cause that they can get excited about, but not all activities are appropriate for company support in the form of additional leave. We seek to work with organisations where our expertise can make a difference and that are relevant to our Sustainability strategy.



For an activity to fall under this policy it has to live up to the following criteria:

- › The activity is a half or full working day.
- › You will not receive any compensation from the organisation you work for.
- › The activity must be work or a specific activity for an organisation. Attending a workshop on diversity, seminar on human rights etc. is not covered.
- › The activity cannot be connected to children or substance abuse.
- › The activity cannot be arranged by a particular religious organisation.
- › The activity should be linked to one of our [Sustainability strategy](#).



DO OUR BEST FOR OUR PARTNERS



- **Building strong relationships**
- **Our role as a business:
Be a responsible partner**
- Working with regulators
- Applying our values to our value chain
- Preventing modern slavery
- **Every employee helps us build strong partnerships**
- How we make our relationships stronger and more sustainable
- Upholding our standards
- **Top tips**
- **Conduct in action**
- **Reporting**



Building strong relationships

GREAT PARTNERSHIPS



ARE BUILT

ON TRUST

As a stable and sustainable partner to our suppliers and associates, we help to facilitate their success and share technological development. Mutual financial benefit is important, but it's not the only way we assess our business relationships.

The values we live by and the ethical standards we uphold reach beyond our (real and virtual) office walls. By setting standards for our partners and promoting transparency within our supply chain, we are able to extend the positive impact we have and move our industry in the right direction.

We work with regulators, service providers, suppliers, and sometimes even our competitors in order to achieve our purpose to transform gambling and contribute positively because we cannot do it alone. We are all able to do more as individuals – and individual businesses – united.



Our role as a business: Be a responsible partner



WORKING WITH REGULATORS

We understand that gambling needs to be regulated consistently to provide protection that respects both the needs of the individual customer and broader social impacts. Digital customers are channelled into regulated online environments run by locally licensed operators to ensure that protection.

In addition to the benefits for customers, channelling is also beneficial to society more broadly. Operators can support local communities through taxes, sponsorship of grassroots sports, and other local initiatives.

Kindred has worked for many years in cooperation with legislators, regulators, industry bodies and other stakeholder groups to ensure that gambling regulation produces a sustainable, safe and thrilling environment. We are active members of all gambling trade associations in our markets and strive through collaboration with peers to streamline the ways our industry communicates policy.





Our role as a business: Be a responsible partner

Our policies



APPLYING OUR VALUES TO OUR VALUE CHAIN



We see it as our responsibility to extend our influence throughout the value chain to improve the standards of our numerous business partners and suppliers.

We work to build long-term relationships with our suppliers and apply a [Global Procurement Policy](#) as well as a [Supplier Code of Conduct](#) that clearly communicates the standards we expect regarding labour and human rights, health and safety, business ethics and the environment.

We believe that by placing the same high demands on our suppliers that we place on ourselves, the pace of progress will increase, contributing to a more sustainable economy.



Our role as a business: Be a responsible partner

Our policies



PREVENTING MODERN SLAVERY

We've instituted specific policies to ensure that modern slavery is not taking place in our supply chains or business, including:

Supplier Code of Conduct

We view suppliers as an important part of our business success. Our code is a set of principles that we expect our suppliers and their subcontractors to operate within.

Procurement Policy

This policy sets out the requirements that must be met by everyone within Kindred when it comes to buying goods and services.

Supply chains and due diligence procedure

Kindred offers sports betting and gaming products in developed markets and most of our suppliers are in high skilled sectors that are rated low risk.

Our Procurement team (supported by others in the wider business, including the Legal team) is involved in performing due diligence on potential suppliers to ensure we work with organisations that share our commitment to the highest possible business and ethical standards. This puts us in the position to make informed decisions about who we want to work with.

Where we are satisfied that it is a supplier which we want to engage with, we then negotiate terms with them (adherence to local laws and regulations regarding modern slavery is a non-negotiable item for us).

[Click here to learn more about our moves to eliminate modern slavery from our supply chain.](#)



Every employee helps us build strong partnerships



HOW WE MAKE OUR RELATIONSHIPS STRONGER AND MORE SUSTAINABLE



We constantly strive to better understand our business impact along the entire value chain and keep a dialogue with stakeholders to address areas of improvement and create mutual value.

We build productive, ethical and transparent relationships and procurement processes with customers, suppliers and other business partners and expect them to have similar principles as set forth in this code. It's the responsibility of all of us to maintain Kindred standards in our day to day individual interactions to support these partnerships and help them flourish.



Every employee helps us build strong partnerships



TO UPHOLD OUR STANDARDS IN ALL PARTNER INTERACTIONS, EMPLOYEES CAN CONTRIBUTE IN SEVERAL WAYS DEPENDING ON YOUR ROLE:

- › Carry out appropriate due diligence checks before engaging new customers, suppliers or business partners.
- › Act honestly, ethically and professionally when interacting with customers, suppliers and business partners in our everyday business activities.
- › Uphold responsible and ethical sales and marketing practices of our products and services.
- › Respect and maintain confidentiality with regard to privacy and commercial trade secrets of our customers, suppliers and business partners.
- › Strive to avoid conflicts of interest with our customers, suppliers and business partners, both as individuals and as a company.
- › At all times comply with applicable anti-bribery and anti-corruption laws and regulations in our dealings with customers, suppliers and associated businesses.



Top tips

1

REVIEW OUR SUPPLIER CODE OF CONDUCT

It's important to understand what Kindred expects of our partners, and to report any breaches. Reporting isn't just an internal requirement. We rely on each other to be vigilant and report any unethical or illegal behaviours amongst our partners as well.

2

REMEMBER THAT PARTNERS COME IN DIFFERENT SHAPES AND SIZES

Suppliers, service providers, contractors – no matter who the partners are, be straightforward with them about what's expected and make it clear that our policies are non-negotiable. If you're working with a partner, make sure they have read and understood the [Supplier Code of Conduct](#).



Conduct in action

IF A PARTNER ASKS ME TO SHARE SENSITIVE INFORMATION, WHAT SHOULD I DO?

Report the incident to your line manager immediately. Never share information with anyone outside of the Company unless it's been requested by your line manager.

WHAT IF A SUPPLIER DOESN'T KNOW IF THEIR SUPPLY CHAIN COMPLIES WITH OUR SUPPLIER CODE OF CONDUCT?

Alert procurement and your line manager. Hopefully the supplier will be keen to rectify the situation, rather than losing a contract. Building on trust requires transparency.



AN AGENCY WE WORK WITH HAS RECENTLY HIRED SOMEONE CLOSE TO ME TO MANAGE OUR ACCOUNT. IS THAT A PROBLEM?

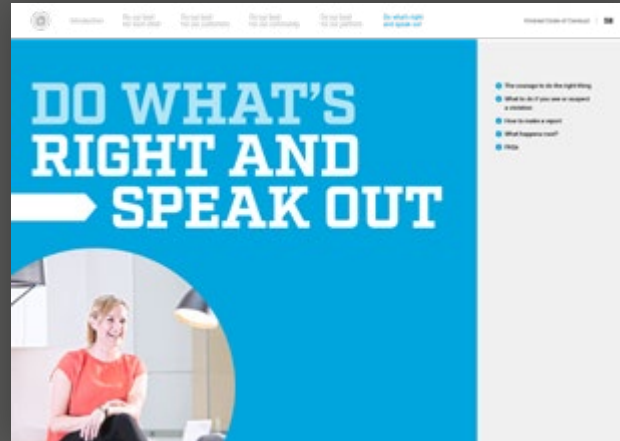
That depends on the situation. Speak to your line manager about it and decide together the best course of action.





Reporting

Treat suspected supplier misconduct the same way you would treat misconduct within the business – report it as soon as possible using the appropriate channels.



[See the section on reporting for more details.](#)



Access our Speak Up portal [here](#)



DO WHAT'S RIGHT AND SPEAK OUT



- ▶ The courage to do the right thing
- ▶ What to do if you see or suspect a violation
- ▶ How to make a report
- ▶ What happens next?
- ▶ FAQs



The courage to do the right thing

TRANSFORMING OUR INDUSTRY



As we continue to transform the gambling industry by being a trusted source of entertainment, there is one thing that can keep us from our goal, and that's our own behaviour. By creating a robust reporting system and encouraging employees to speak up, we are reinforcing the importance of trust and honesty to our business and our industry, and deterring inappropriate behaviour.

Reporting also helps us safeguard the inclusive and supportive culture we've created internally, ensuring that we're all aware of what's expected of us and equipped to make the right decisions.

AND SUPPORTING

OUR CULTURE



What to do if you see or suspect a violation

REPORT IT



If you think there has been a breach of our internal policies, or see behaviour that might be illegal or unethical, please speak out and let us know as soon as possible. We can only investigate a possible breach if we know about it.

You don't need to be 100 per cent sure of your facts so long as you have reasonable grounds for suspecting that wrongdoing has taken or might take place.

Your report will be treated confidentially, and there are no negative repercussions for making a report in good faith.



How to make a report

We take all allegations of malpractice and misconduct seriously and will deal with individuals' concerns confidentially and sensitively. We do our best to resolve all work-related issues fairly and quickly.

If you think that something isn't right, we want you to tell us about it. Here's how you can let us know:

Firstly, go to your line manager or People Team

Grievances with a colleague that are related to perceived poor performance, competence or working behaviours should be raised with your line manager or with your local People Team representative if you do not consider it appropriate to raise with your manager.

The People Team deal with highly sensitive situations every day and will always keep your report confidential. Talking to your local People Team representative will allow you to air the problem and then make a choice about how you would like to take the case forward.

If you can't approach your line manager or People Team

Contact ['Speak Up'](#) – it's a safe, independent and confidential whistleblowing website portal.

If the behaviour is illegal or radically unethical (that could impact any of Kindred's licences), or if you don't think the situation warrants raising a concern or question with your manager or People Team, please do not hesitate to use this dedicated portal to submit a report.

To ensure independence, 'Speak Up' is operated by NAVEX Global, a third-party company acting on behalf of Kindred. Concerns are managed by the Head of Internal Audit and the Audit Committee, who are independent from management at Kindred.

Visit the ['Speak Up' portal](#) for more details or to make a report.



What happens next?

We know that it can take courage to do the right thing, which is why we promise to treat reports of misconduct or malpractice sensitively and confidentially. We will never penalise somebody who raises a genuine concern, even if it turns out that no wrongdoing took place.



“ We stand together with a bold and ambitious purpose: to transform gambling by being a trusted source of entertainment that contributes positively to society.”

Rachel Randle-Williams
CHRO



FAQs

Q What happens if I was mistaken?

A So long as your suspicions are genuine and the report isn't malicious, you won't be treated less favourably or suffer any detriment for raising a concern, even if it turns out that we didn't find any evidence of wrongdoing.

Q Will you keep my identity confidential if I make a report?

A You have the option of raising a legitimate concern anonymously, and even if you do not, we will keep your identity confidential unless we are legally required to disclose who made the report (for example to the police or a court).

Q What if I think one of our partners or suppliers is involved in wrongdoing?

A Follow reporting guidelines contained in this policy and on the ['Speak Up' portal](#) to report suspicions about third parties who provide services to our Company, as well as the conduct of our own employees or the Company itself.

Q Should I report this issue to my manager or the People Team?

A The first port of call should normally be your line manager or People Team representative, who will work to resolve the issue as smoothly as possible. The ['Speak Up' portal](#) should be used if you do not feel that these channels are appropriate because the concern relates to illegal activity or highly unethical behaviour that could affect any of Kindred's licences.

Q What happens if I lose my report key or password for the 'Speak Up' portal?

A After you complete your report you will be assigned a unique code called a 'report key'. Write down your report key and password and keep them in a safe place so you can check on the status of your report later. Due to anonymity, we cannot recover report keys or passwords. If these are lost, you will have to make a new submission.



References

[Anti-money laundering policy](#)

[Bribery policy](#)

[Compliance framework](#)

[Compliance training programme](#)

[Culture of trust](#)

[Disclosure and insider trading policies](#)

[Hybrid working guide](#)

[Player Safety – Early Detection System \(PS-EDS\)](#)

[Preventing modern slavery](#)

[Procurement policy](#)

[Responsible gambling policy](#)

['Speak Up' portal](#)

[Supplier Code of Conduct](#)

[Sustainability Report](#)

[Sustainability strategy](#)

[Zero Harm policy](#)

If you have any questions regarding the Kindred Code of Conduct, please contact:

Rachel Randle-Williams

Chief HR Officer

Rachel.RandleWilliams@kindredgroup.com

Kindred Group plc

Level 6, The Centre
Tigne Point, Sliema TPO 0001, Malta.

Tel: +356 2133 3532
Company No: C39017.

Registered in Malta.

Registered office

c/o Camilleri Preziosi,
Level 2, Valletta Buildings
South Street, Valletta VLT 1103, Malta.

www.kindredgroup.com

