



Danske Spil

Code of Conduct

Danske Spil A/S
CVR-nr. 64 01 17 15



Code of Conduct for suppliers and business partners of the Danske Spil Group

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1. Introduction

The Danske Spil Group ("Danske Spil") is working actively to be a responsible operator in the betting and gambling market. We strive to always demonstrate the highest level of corporate social responsibility in our business activities.

Danske Spil considers the relationship with our suppliers and business partners ("Partners") to be essential for achieving our business goals and ESG objectives.

Any reference to "the Partner" in section 8 (business ethics) of this document includes not only the legal person but also natural persons who are members of the company's board of directors, management or supervisory board.

Danske Spil only wishes to cooperate and enter into contracts with Partners who share our desire to conduct business in a manner that is environmentally, socially and managerially responsible and inclusive, including through compliance with key global, EU and national regulatory frameworks in this area, including the principles of the UN Global Compact Initiative, applicable where the Partner operates. This Code of Conduct clarifies what Danske Spil considers the minimum standard in this respect. Depending on the context, Danske Spil will make additional specific requirements that are considered relevant for the specific deliveries and/or cooperation with Danske Spil.

2. Scope and delimitation

In addition to the provisions of this Code of Conduct, the Partner shall comply with all key global, EU and national regulatory frameworks applicable where the Partner carries out its activities.

The provisions of this Code of Conduct apply to all the Partner's employees and all subcontractors who directly or indirectly provide a product or service to Danske Spil. The Partner shall ensure that employees and subcontractors work in accordance with this Code of Conduct. In addition, consultants working at Danske Spil must comply with Danske Spil's staff manual.

3. Follow-up and terms

In case of doubt as to the interpretation of the provisions of the Code of Conduct, the Partner shall proactively and without undue delay contact Danske Spil for clarification.

Danske Spil reserves the right to follow up on the Partner's compliance with the Code of Conduct in order to assess whether the Partner operates in accordance with the Code of Conduct. Follow-up may be, for example, a request for documentation or a visit to the Partner. The Partner is obliged to contribute and assist in connection with Danske Spil's follow-up.

If matters are found at the Partner in breach of this Code of Conduct, the Partner shall immediately inform Danske Spil accordingly with information of how this can be remedied. In addition, the Partner shall take the necessary precautions to avoid repetition.

In the event of a breach of the Code of Conduct, Danske Spil reserves the right to terminate the cooperation and any agreement of which the Code of Conduct may be a part. When assessing this, Danske Spil will take into account the extent of the breach, the Partner's information about the breach to Danske Spil, precautions to remedy the breach and the measures taken by the Partner to avoid further breaches.



4. Responsible gambling habits

It is the business of Danske Spil to offer entertaining games in responsible settings for the pleasure and benefit of the Danes. Danske Spil therefore has responsible gambling habits as one of our most important strategic focus areas. Responsible gambling habits are both about preventing and reducing gambling addiction and preventing gambling problems in our customers, including a special focus on protecting children, young people and other vulnerable groups and contributing to the overall promotion of a responsible gambling market in Denmark with equal rules for all.

Therefore, Danske Spil requires of Partners who provide products or services directly related to our range of games or act on behalf of Danske Spil that they share our view of accountability as a fundamental value and contribute to Danske Spil being able to live up to our commitments in responsible gambling habits, even when we want to take the lead and pull the industry in a more responsible direction.

This means at least that the Partner must ensure that the services provided by the Partner to Danske Spil comply at all times with applicable Danish legislation and industry code¹.

Danske Spil may choose to set more specific requirements for healthy gambling habits with the Partner depending on the type of cooperation. To this end, Danske Spil has developed guidelines targeting different types of cooperations that describe more precisely what requirements for responsible gambling habits the Partner is obliged to comply with in practice when acting on Danske Spil's behalf.

5. Match-fixing

Danske Spil is active in the fight against match-fixing or match-rigging in connection with sports matches, as we want to protect the integrity of sport and work to ensure a responsible and safe gambling market. For those of Danske Spil's Partners engaged in sports betting or having knowledge about it, Danske Spil expects the Partner to prevent and continuously be active in the fight against match-fixing, for example through the sharing of information with sports federations, gambling companies or through participation in global initiatives such as United Lotteries for Integrity in Sports (ULIS)². Danske Spil has helped set up the latter and continues to be an active part of the initiative.

¹ The Danish Gambling Act (*spilloven*) and related administratively issued orders and guidelines in the area of responsible gambling, <https://www.spillemyndigheden.dk/lovgrundlag#-lovgrundlag-> as well as the Gambling Industry's Code of Conduct for Socially Responsible Marketing of Games <https://spillebranchen.dk/spilindustriens-adfaerdskodeks-2/>

² <https://ulis.org/>



6. People

6.1 Respect for human and labour rights

Partners shall respect human rights as described in the UN Guidelines on Human Rights and Business³, as well as the European Convention on Human Rights⁴, both in relation to their own employees and in relation to their own business partners. The Partner shall also respect labour rights as described in ILO conventions⁵ and shall comply with applicable employment rules where the Partner operates. The Partner shall ensure that workers involved in the cooperation with Danske Spil are guaranteed wages, hours of work and other working conditions no less favourable than those applicable to work of the same nature under legislation or by the collective agreement concluded by those most representative in the field of the profession concerned in the geographical area in which the workers carry out their work.

6.2 Abuse and anti-discrimination

The Partner shall ensure that employees are protected from abuse, harassment and bullying in the workplace and that any matters are handled while protecting the employees concerned. Employees shall have access to a written complaint procedure that is clear and easy to understand.

The Partner shall not discriminate in connection with recruitment, promotion or dismissal on the basis of the age, gender, religion, sexuality, social or ethnic origin, nationality, disability or political affiliation of employees. The Partner shall be able to provide evidence of how discrimination is avoided.

6.3 Health and a safe working environment

The Partner shall ensure that the workplace is safe for the employees, and the Partner shall in this context comply with applicable health and safety regulations in the specific area. In addition, the Partner shall promote a healthy physical and mental working environment and ensure that employees are consulted in relation to the promotion of health and safety and that appropriate policies and procedures are always in place.

6.4 Employment conditions

The Partner undertakes to comply with applicable legislation on the conclusion of employment contracts, compliance with minimum wages, to refrain from using paid work for which no tax is paid, child labour or forced labour. The Partner shall respect the freedom of employees to organise in associations, strike and enter into collective agreements.

³ https://www.ohchr.org/documents/publications/GuidingprinciplesBusinessshr_eN.pdf

⁴ https://www.echr.coe.int/documents/convention_dan.pdf

⁵ <http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>



7. Climate and environment

7.1 Compliance with legislation and best practices

At Danske Spil, we are aware that our business affects the climate and the environment, and we are continuously working to map, document and reduce our climate and environmental footprint.

The Partner shall therefore comply with applicable international and national environmental regulations and standards as well as the UN Sustainable Development Goals which specifically address the products or services that the Partner provides to Danske Spil. The Partner shall have a climate strategy that proactively addresses all serious negative impacts in areas covered by the Rio Declaration on Environment and Development.

In addition, in particular with regard to climate and the environment, including respect for animal and plant life, the Partner shall demonstrate particularly responsible behaviour by integrating climate and environmental considerations into all parts of the Partner's business. In this context, the Partner shall develop strategies, policies and initiatives that reduce the Partner's environmental and climate impact and support the objectives of the Paris Agreement and the Danish Climate Act (*klimaloven*) (Consolidating Act No. 2580 of 13 December 2021). Furthermore, the Partner shall act at least according to best practices in the Partner's industry and business area, as well as use best available technology and anti-pollution measures to reduce the climate footprint of its activities and products and services. It is thus the Partner's responsibility to take the lead in its industry in order to reduce negative impacts on climate and environment related to its activities and products and services. This could include, for example, continuous reduction of energy consumption, reduction in the use of raw materials, waste management and information to employees.

7.2 Documentation, reporting and follow-up in relation to climate and environment

In the event that the Partner is subject to reporting obligations pursuant to the Corporate Sustainability Reporting Directive (CSRD), or if the Partner supplies goods and/or services falling within any of the following categories, the Partner shall, in accordance with the Greenhouse Gas Protocol (GHG Protocol), on an annual basis provide Danske Spil with information regarding the emissions attributable to the deliveries made to Danske Spil, covering scope 1, 2 and 3 emissions:

- Housing, whereby Danske Spil's IT equipment is located in one or more external data centres operated by a third-party supplier providing space, electricity, cooling, security, and network connectivity;
- Printed materials, including scratch cards;
- Hardware;
- Transport and distribution;
- Plastic products;
- Furniture, including retail fixtures and fittings.

Upon request by Danske Spil, the Partner shall be obliged to account for any strategies, policies, and initiatives implemented with the aim of reducing its environmental and climate impact. Danske Spil shall also retain the right to be informed of any significant sustainability-related initiatives launched by the Partner with a view to mitigating its environmental and climate footprint.



Irrespective of whether the Partner is required to report emissions data under the above provisions, the Partner shall, on an annual basis, provide Danske Spil with a report detailing any initiatives implemented during the preceding 12 months which have contributed to a reduction in the climate impact of the services rendered to Danske Spil. Such reporting shall include an assessment of the anticipated environmental or climate-related effects of said initiatives.

8. Business ethics

Danske Spil works to the highest standards of integrity, honesty, transparency and professionalism in the way we do business. The Partner shall maintain the same high standard in the cooperation with Danske Spil and at least comply with all applicable rules and legislation in this area.

8.1 Anti-corruption and bribery

The Partner shall refrain in any way from engaging in, tolerating or benefiting from corruption, including refraining from bribery, facilitation payments and extortion or the use of other means of unlawfully influencing business associates, public officials, judges and/or private entities for personal gain.

8.2 Crime, sanctions lists and terrorism

The Partner shall not engage in or perform any act for a criminal organisation or for any person, group or entity subject to EU financial sanctions. Likewise, the Partner shall not commit acts related to terrorist activities, assist in or attempt to commit such acts, including the financing of those acts. In addition, the Partner shall comply with trade sanctions set by the EU.

8.3 Money laundering

The Partner shall not contribute in any way to money laundering and shall at least comply with applicable anti-money laundering rules and legislation. Danske Spil does not provide and receive payment for products or services to anyone other than the contractual Partner and its bank account.

8.4 Ethical conduct and conflicts of interest

The Partner shall at all times exercise good judgment and due diligence when advising and providing products or services to Danske Spil. In addition, the Partner shall help avoid conflicts of interest arising in the cooperation with Danske Spil. If the Partner becomes aware of possible unethical behaviour or personal, financial or work relationships on the part of the Partner's employees or in relation to the Partner's subcontractors or other business partners which may constitute a conflict of interest in relation to the cooperation with Danske Spil, the Partner shall immediately inform Danske Spil accordingly.

8.5 Gifts and entertainment

Danske Spil does not accept that the Partner offers Danske Spil or Danske Spil's employees gifts or entertainment for the purpose of influencing Danske Spil's or the employee's decisions. On special occasions, employees of Danske Spil may receive and give gifts if the value of the gift is less than DKK 700 including VAT. There must be no associated agreements, expectations or benefits to the gift. Gifts must never be given or received during a tendering process.



8.6 Tax evasion and debt to public authorities

The Partner is expected not to be established in a jurisdiction included in the EU list of non-cooperative jurisdictions for tax purposes. In addition, the Partner shall not have unpaid debt due to the public authorities of DKK 100,000 or more. The calculation shall include, among other things, taxes, levies, and social security contributions.

8.7 Management

The Partner shall follow principles of good governance within the industry in which the Partner operates, as well as have a written management set of values that shall include transparency and diversity.

In addition, the Partner shall be managerially inclusive both in relation to internal stakeholders, e.g. employees, and in relation to external stakeholders, e.g. shareholders.

8.8 Protection of confidential information and personal data

The Partner shall observe unconditional confidentiality with regard to confidential and commercial information about Danske Spil, of which the Partner becomes aware in connection with the cooperation. The duty of confidentiality shall also apply after termination of the cooperation regardless of the reason for termination, unless otherwise agreed.

Like Danske Spil, the Partner shall comply with all applicable rules and legislation in relation to the protection, storage and erasure of personal data and provide appropriate protection for the data. The Partner shall not process personal data for or on behalf of Danske Spil unless a data processing agreement has been entered into beforehand.

If the Partner provides IT services to Danske Spil, the Partner shall have adequate technical and organisational measures to ensure an IT security that is at least equivalent to the standard in the industry to which the Partner belongs and that is sufficient to protect Danske Spil's data and IT environment.



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