



# Better Collective

## Code of Conduct



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## 1. INTRODUCTION

At Better Collective, we celebrate that our core values are built upon the principles of creating transparency and education within the iGaming community. To ensure that these values are adhered to, we present this Code of Conduct to all our employees in order to guarantee that our principles are maintained.

### 1.2 Purpose

As Better Collective is active globally within an industry that has varying regulations across borders, we rely on this Code of Conduct to educate our employees about how we enforce our business practice standards.

This Code of Conduct cannot directly address all issues that an employee may encounter. In these situations, we expect that our employees make sound judgements and decisions based on the values and regulations of Better Collective. Employees are expected to act in the interest of Better Collective in all respects. If any employee is in doubt regarding their potential action, they should contact their nearest manager.

### 1.3 Our Values

The overarching vision of Better Collective is to empower iGamers. We achieve this vision by executing our mission of making betting and gambling entertaining, transparent and fair.

Internally, our organisation is founded on a set of values that ensures that our employees are all working towards supporting our vision. These core values are as follows:

***Talent***, *Talented employees are key to our success.*

***Respect***, *We respect each other, our users and our partners.*

***Innovation***, *We innovate remarkable products and processes that make a difference to our users.*

***Dedication***, *We are dedicated to enrich betting and gambling for our users.*

## 2. BETTER COLLECTIVE BUSINESS ETHICS IN GENERAL

### 2.1. Managerial Responsibility

It is at the responsibility of every manager within Better Collective to ensure that the employees who report directly to them are presented with this Code of Conduct. It is also the responsibility of the manager to ensure that the persons in question understand this Code of Conduct, and any questions they have in relation to it are thoroughly answered.

### 2.2. Protection and Proper Use of Corporate Assets

The overall well-being of Better Collective is dependent on enforcing our stance on protection and proper use of corporate assets. Negligence of this by anyone whom this Code of Conduct applies to can have a negative impact on the overall performance of the organisation.



It is, therefore, important that the rules set forth by the Better Collective Handbook are followed. This includes proper safety practices pertaining to your official work email, antivirus protection, as well as adhering to the Employee's Duty of Loyalty.

If you have any questions regarding this subject, please refer to the Better Collective Handbook or obtain clarification from your immediate manager.

### 2.3 Personal Integrity and Avoid Conflict of Interest

If personal interest, or the interest of third-party stakeholders, interferes with an employee's ability to perform in the best interest of Better Collective, then they are experiencing a conflict of interest. Conflicts of interest may arise without any initial intent of the employee, and therefore, it becomes important to identify potential conflicts, as well as actively avoid any of these potential conflicts.

If you become aware of any of these potential conflicts, it is important to disclose them to either your manager or HR department so that they can be avoided or facilitated via the appropriate procedures.

### 2.4. Gifts, Meals, and Entertainment

In order to protect and develop business relationships, employees are allowed to give and receive gifts, meals, and entertainment. Gifts given by Better Collective's employees may not be cash, must be insignificant in amount, and may not be given in consideration and/or expectation of any action by the recipient or the organisation he/she represents. Entertainment accepted by or provided to people doing business with Better Collective must be appropriate and serve legitimate business purposes and must not be based on reciprocal action.

Gifts, meals, and entertainment may never compromise the ability to make objective and fair business decisions that serve the interests of Better Collective. Your nearest manager must always be informed of gifts, meals, and entertainment that are given or received.

### 2.5. Respectful and Motivational Workplace

A priority of Better Collective is to ensure a great work culture and workplace. We work hard to constantly provide an atmosphere that rewards and motivates our employees. We take responsibility for our employees' safety, health and wellbeing and for contributing to a sound balance between work and leisure time in order to sustain a healthy high performance.

One of Better Collective's fundamental values is *Respect*. This value applies not only to our users and partners, but also to our employees. We are proud of our ability to recruit diverse and international employees, and anyone who joins the Better Collective family is able to develop and become promoted through the organisation, regardless of race, gender, color, religion, language, political and/or personal convictions, nationality, sexual orientation, age, health status, social origin, disability, or other distinguishing characteristics. Furthermore, any act of disrespect in the form of misconduct by an employee, or harassment of an employee, will not be tolerated.

### 2.6. Personal Appearance

Although we pride ourselves on keeping our work culture casual, we are still a professional organisation. We expect all employees to behave respectfully when representing Better Collective, both internally and externally. Furthermore, we expect all our employees to be well-groomed and properly dressed.



## 2.7. Environment

We support and encourage the use and development of environmentally friendly technologies, products and services, looking to contribute to sustainable development. We agree with the global consensus on the threat of climate change, and work to reduce the environmental footprint of our operations and in our value chain.

## 3. LAWS & REGULATIONS

### 3.1. Compliance with Laws and Company Policies

At Better Collective, our reputation and business depend on compliance with all applicable rules, regulations and laws. As we work within a field where things evolve quickly and regulation changes on an ongoing basis, it is of utmost importance that we are continually aware of, and immediately implement processes to comply with, legal changes. All employees of Better Collective must comply with these. In this regard, it is also the responsibility of each individual to read, understand and comply with all company policies, and, in cases of doubt, to consult with their manager.

### 3.2. Data Protection and Privacy Laws

Better Collective is fundamentally a digital company. Therefore, we take digital data protection and privacy laws very seriously, both for all of those whom this Code of Conduct is relevant to, as well as our end-users.

Better Collective respects the privacy of all of its stakeholders and exercises extreme care to legally secure that any sensitive personal and private information is not publicly disclosed.

### 3.3. Anti-corruption and anti-bribery laws

The act of corruption and bribery is illegal within the majority of the countries in which Better Collective operates. It is typically prohibited by law to make payments, or the promise of making payments (whether it is in the form of money or other services and assets of value) to any public official in order to manipulate a procedure or outcome. The nature of violating these anti-corruption/bribery laws often result in legal consequences. These consequences apply whether the violation of these laws is committed directly by an employee, or any third-party associated with or acting on the behalf of Better Collective.

Better Collective condemns the acts of corruption and bribery and considers them to be extremely unethical. Thus, we consider any act that can be considered as a form of corruption or bribery (regardless of the local legislation) as being prohibited.

### 3.4. Accuracy of Books, Records, and Public Reports

The accuracy and truthfulness of Better Collective's books, records, and public reports that are submitted to either public or governmental authorities is crucial in order for Better Collective to meet legal and regulatory standards and obligations.

All employees must be honest in the reporting of their business transactions to ensure the accuracy of our records. You must never intentionally submit false or misleading statements to any financial representative, both internally and externally.



### 3.5. Human Rights

We respect fundamental and internationally recognised human rights in all areas of operation and fully recognise our responsibility to protect human rights in every part of our business conduct. We take action to remedy adverse human rights impact involving Better Collective. We are committed to take voluntary action in order to support the protection and fulfilment of human rights.

## 4. BUSINESS ETHICS IN OUR INTERACTIONS WITH STAKEHOLDERS

### 4.1. Business Model

Better Collective's business model is built on the iGaming Affiliate model. What this implies is that all of Better Collective's products and platforms earn money by directing internet traffic to our iGaming partners (Operators). When an end user explores one of our platforms and clicks through from our page to register with a bookmaker, we earn revenue. The forms of revenue deal we have vary from partner to partner.

The Affiliate Business model is very common in the digital marketplace. It can be seen in practice with sites such as flight and hotel price comparison platforms, food blogs, and established newspapers.

If you have any questions regarding specific deals we have in place, or want to learn more details about the business model, you can read about it [here](#) or ask your direct manager.

### 4.2. Compliance with Industry Standards

As Better Collective works within the iGaming industry, there are a variety of compliance regulations we must adhere to across the different countries where we operate.

Our core values of bringing transparency and honesty to the gambling industry is dependent on our ability to maintain in line with operator regulations. Any compromise of these regulations is condemned by Better Collective and will have consequences.

Furthermore, the majority of the countries in which we operate have legal age-restrictions for those wishing to gamble. With that being the case, it is crucial that all Better Collective products and platforms clearly state that their content and intent are only applicable to those who are of legal age.

If you have any questions regarding regulations and how it applies to your own work, or Better Collective as a whole, please ask your immediate manager for clarification.

### 4.3. Our Perception of Gambling

We strictly perceive and present that gambling is a form of entertainment. Gambling should not serve as a source of income but be practiced as a fun activity. When gambling, the sole purpose should not be to increase one's initial stake, but to set aside a stake that one is willing to lose for the sake of entertainment.

Of course, a fun aspect of gambling is potentially winning more money. This is why all of our platforms focus on the teachings of gambling strategies, and the presentation of insightful information to help our users feel more confident in their betting. However, we do not, and cannot, guarantee winning—and we will never claim to do so.



#### 4.4. Responsible Gaming

At Better Collective, we want to make sure that our users' and employees' iGaming experiences remain as a form of fun and entertainment. That is why we strongly endorse responsible gaming. This entails making sure that our users and employees are aware of the legal gambling age in the areas they operate and are aware of possible negative effects of gambling that could lead to addiction and how to prevent these effects.

When creating content or new platforms, employees should always have responsible gaming in mind. If there is any doubt as to what Gaming Responsibly entails, refer to our extensive content [here](#). This content addresses gambling addiction, its symptoms and the preventative measures available.

#### 4.5. Supporting the Further Study to eliminate Gambling Addiction

Better Collective views iGaming and gambling purely as a form of entertainment. However, we cannot ignore that there are users for whom it surpasses entertainment and becomes personally detrimental in the form of a gambling addiction.

Therefore, we are supporting responsible Gambling through our investment in and our collaboration with Mindway AI, a company who research in neuroscience, neuroimaging and problem gambling, converting research results into responsible gambling solutions.

#### 4.6. Objective and Honest Communication as an iGaming Affiliate

As previously stated, Better Collective's business model is based on providing traffic to our Operator partners—however, many of our platforms include reviews of these Operators. With that being the case, it is important to clearly state, and for the employees to understand, that the content of our products must always remain objective and honest. Although it could be argued that it would be in Better Collective's best financial interest to provide content praising all of our partners, this form of communication would be against the interest of our users.

All of our products and their contents are designed to support our users ahead of any Operator partners. Any dishonest communication on any Better Collective platform depicting otherwise will not be tolerated and will have immediate consequences.

### 5. IF YOU SEE SOMETHING - SAY SOMETHING

#### 5.1. Reporting Violations of this Code and Anti-retaliation (Whistleblower Policy)

As an employee, it is your responsibility to ask for clarification, seek guidance, and report any activity that you suspect is in violation of this Code of Conduct. If you have a suspicion of a given activity executed by any other relevant stakeholder of this Code of Conduct, it is your responsibility to report it to your immediate manager or a compliance representative.

If your role is that of a manager or compliance representative, and you receive such a report of suspected activity, it is your responsibility to inform your immediate manager or compliance representative, rather than start your own independent investigation.

Any reporting of suspected violations can be performed anonymously. Better Collective prohibits any retaliation against an employee that makes such a report. This anonymous and protected reporting of suspected violations is outlined through, and enforced by, our Whistleblower policy.



## 5.2. Failure to Comply with this Code

Any employee who fails to comply with this Code of Conduct is subject to various forms of disciplinary action. These actions include, but are not limited to, the issuing of a reprimand or warning, probation or suspension, demotion and dismissal. Additionally, if the failure to comply with this code breaches any laws, the employee in question is subject to local law and regulations.

If a manager facilitates, approves, or ignores any actions or behaviors that do not comply with this Code of Conduct, they are also subject to the aforementioned disciplinary actions. No member of management will be penalised for any losses the organisation may incur by adhering to this Code of Conduct.

## 5.3. Dissemination and Amendment

This Code of Conduct will be distributed to all existing employees at Better Collective, as well as any new employees upon commencing their employment with Better Collective. When the Code of Conduct has been distributed to an employee, it must be confirmed and documented through official Better Collective communication channels that it has been read and comprehended.

Better Collective reserves the right to update, amend and/or terminate this Code of Conduct at any time and for any reason. The employees will be made aware of these updates, amendments and/or terminations. The most current version of the Code of Conduct will be featured on Better Collective's intranet.



