Sustainability

Statement of corporate responsibility
cf. the Danish Financial Statements Act sections 99a, 99b, 99d and 107d as well as the EU Taxonomy regulation.
Founder statement

We are pleased to present Better Collective’s sustainability report for the year 2022, which showcases our ongoing commitment to environmental, social and governance (ESG) practices.

Since we founded Better Collective, we have strived to offer entertaining and engaging sports media content for our users. This objective has shaped our vision to become the leading digital sports media group along with our mission to make sports entertainment more engaging and fair. As a leader in the intersection of media and entertainment, with an element of iGaming, we reach millions of sports fans. With this position comes an obligation to ensure a responsible and sustainable offering including editorial guidelines, proper segmentation, and safer gambling resources.

Offering transparency in the industry

As we are continually growing our business and adding new entities, we dedicate our attention to initiatives that allow us to grow sustainably. Most importantly, we want to help sports fans navigate the world of sports betting by having them visit a Better Collective brand before registering an account or placing a bet with a sportsbook. This is important as we only work with licensed sportsbooks in regulated markets. Our US leading sports betting media, Action Network, has an app which is used by millions of sports fans. In this app, we have developed BetSync, which offers users the unique opportunity to track their bets and outcomes across several sportsbooks. This adds transparency and supports a sustainable betting behavior. We are excited about the positive feedback we receive from BetSync users and the transparency we can offer down the line as we onboard more sportsbooks to the solution and explore more geographies for the app.

Playing a key role in channelization

As we operate in regulated markets with licensed sportsbooks, we play an important role in channeling users to the right sportsbooks. In the online marketplace, users will be met with a multitude of offers, some of which are outside the regulated markets which means that user protection measures may not be in place and marketing practices non-compliant. Our objective is to work with partners who proactively address safer gambling and given our position in the value chain, we aim to educate our users while pointing them towards legal sportsbooks.
Our commitment to sustainability

Being a business with operations structured around responsible practices, we find it crucial to support the overall sustainable development of our world and industry. This is why Better Collective committed to incorporate the UN Global Compact and its 10 principles into our strategy, culture, and day-to-day operations in 2019. With this report, which is also our Communication on Progress, we renew our ongoing commitment to the initiative and our continued support for the Sustainable Development Goals (SDGs). As a result of our commitment we always strive to operate in ways that meet fundamental responsibilities in the areas of human rights, labor, environment and anti-corruption. We see our efforts and commitment as constant work which each year gets better, and we strive to supply the data to support transparency of our efforts.

A talented and diverse workforce is key

In 2022, we established a Diversity, Equity & Inclusion topics in the Better Collective Group. A special focus this last year has been actively pursuing a diverse workforce and ensuring equal opportunity to everyone. If we take a quick look at our organization, it is evident that when it comes to females in leadership positions we are – like most other companies in our industry – lagging behind. To speed up our efforts and create awareness, we have recently signed two pledges: The Confederation of Danish Industry’s (DI) Gender Diversity Pledge along with the UN’s Women Empowerment Principles. We genuinely believe that by having a better representation of society in our company and creating a working environment that is inclusive and fair, we will foster an innovative environment and, in the end, become a more sustainable and successful business.

Environmental responsibility

‘To strengthen our sustainability approach, we have been tracking our carbon emissions for the fourth consecutive year. Being an online business, our footprint is limited, and our largest impact comes from our travel activities. With offices across the world, we value the opportunity to meet in person to create closer ties between teams and similarly for business contacts, not least after being cut off from meetings during the pandemic. That said, we have also fully embraced the virtual meeting facilities and we are carefully considering when to fly. Throughout 2022, we have updated and developed our policies, systems, and processes to manage and mitigate social, governance and environmental risks.

We approach diversity and inclusion as drivers in our long-term strategy; building a sustainable business that is here to perform not only today and tomorrow but also far into the future.”

Jesper Segaard
Co-founder and CEO

Recently posted to ESG targets

We acknowledge that our sustainability reporting and responsibilities require constant attention and resources. Therefore, we have laid a solid foundation upon which a clear vision for our sustainability work continuously can be built. In 2022, we started including ESG goals in the executive management team’s bonus and for 2023 the ESG goals will make up 10% and be based on social KPIs: gender diversity and employee training.

Uncertainty brought on by the Russian invasion of Ukraine

The Russian invasion of Ukraine caused us to suspend business activities related to the Russian market. The impact on our business has been limited and we have no employees or representation in Ukraine, yet we have Ukrainian employees and others with close ties to Ukraine who are deeply affected by the current situation. We have made donations to humanitarian action and set up a program to aid our Polish colleagues to volunteer in local initiatives.

Looking ahead

Overall, we are proud of the progress we have made this year in our sustainability efforts. We remain committed to building a better, more sustainable future for our company and our stakeholders, and we look forward to continuing to lead by example in the years to come.

Christian Kirk Rasmussen
Co-founder & COO

Jesper Segaard
Co-founder & CEO

We approach diversity and inclusion as drivers in our long-term strategy; building a sustainable business that is here to perform not only today and tomorrow but also far into the future.”

Jesper Segaard
Co-founder and CEO

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Reporting framework

The present report covers the financial year January 1, 2022, to December 31, 2022, and constitutes our statutory reporting cf. the Danish Financial Statements Act, Sections 99a, 99b, 99d and 107d as well as the EU Taxonomy regulation.

To give our stakeholders an overview of our performances, the report puts forth our current sustainability efforts and presents our focus areas, ambitions, achievements, and goals. The report addresses any relevant social, governance and environmental issues relating to Better Collective’s activities.

Framework and commitments

To operationalise our sustainability strategy we have built on our framework which we introduced in the 2020 sustainability report. In this report, we have further aligned our framework to the Environmental, Social and Governance factors (ESG) and related them to our business operations and key stakeholders. We have made sure that each area contributes to the positive development of the chosen Sustainable Development Goals (SDGs) and/or respects the UNGC ten guiding principles. The report also serves as our Communication on Progress as we renew our ongoing commitment to the initiative and our continued support for the SDGs. Our overall ambition is to use our leading position to influence and support safer gambling and a sustainable development of society – for the benefit of our employees, shareholders, users, partners, the industry and our business.

Our commitment is founded on respect for the core principles of human rights (including labor rights), the environment (including climate), and anti-corruption as reflected in the UN Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises. This commitment is embedded in our strategy and business operations.

The ESG key figures presented in our reporting take their departure in the ESG key figure overview as published by The Danish Finance Society / CFA Society Denmark, FSR – Danish Auditors, and Nasdaq Copenhagen. The reported data is uploaded to Nasdaq Nordic’s ESG Data Portal certifying Better Collective as a Nasdaq ESG Transparency partner.

Continuity

While we have further aligned our focus areas to the ESG framework, we have ensured continuity in reporting. Our ESG metrics have all been continued from the previous sustainability report and for 2022 we have implemented new data points for increased transparency and in preparation for the upcoming Corporate Sustainability Reporting Directive to come into force from the financial year 203.

We have discontinued local communities as a separate focus area and instead included our ongoing initiatives in social and environmental respectively.

In the 2020 and 2021 reports we have addressed the Covid-19 pandemic and its impact on the company’s operations and the health and safety of our employees. As the impact was limited and declining in 2021, management has assessed the matter to be non-material for the 2022 report.

Balance

Throughout the report we describe our efforts and achievements whether they are positive or negative. We ensure this by continuing to report on the same metrics year after year and only adding to rather than discontinuing reporting on those metrics.
Materiality assessment
The report primarily focuses on the topics that are considered the most important to our business operations. These topics have been selected and prioritized based on a double materiality assessment performed by Better Collective’s management and the sustainability board. The assessment is carried out as a mix of desk research, internal workshops, questionnaires and dialogue over time with our primary stakeholders for sustainability, and the board. We consider our stakeholders for sustainability to be our shareholders, our partners and sports fans, our employees, regulatory authorities, and society as a whole. The assessment includes how our activities may affect society negatively and how society may affect the company negatively.

The sustainability data collection in the present report relates to Better Collective’s operations for 2022, and further addresses our ambitions and KPIs for the future both short- and long-term. The outcome of our materiality assessment is listed in the tables below.

<table>
<thead>
<tr>
<th>Major</th>
<th>Significant</th>
<th>Moderate</th>
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<tbody>
<tr>
<td>Safer gambling</td>
<td>Business ethics</td>
<td>Data/privacy protection</td>
</tr>
<tr>
<td>Talent attraction and retention</td>
<td>Cybersecurity</td>
<td>Tax transparency</td>
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<td>Employee development</td>
<td>Responsible marketing</td>
<td>Climate risk</td>
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<tr>
<td>Diversity, equity and inclusion</td>
<td>Anti-corruption</td>
<td></td>
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</table>
ESG strategy

Responsibility and sustainability are ingrained elements of Better Collective’s business model and have been the cornerstone of our organization since its inception in 2004.

Social

**Our people:** Foster and uphold an inclusive and diverse workplace by implementing socially responsible conducts and eliminating all discriminatory practices.

**Our users:** To promote safer gambling through education of users

Governance

At all times comply with applicable legislation in the countries in which we are active, and work against corruption in all its forms.

Environment

Promoting greater environmental responsibility through sustainable business practices and minimizing our carbon emissions.

Regulated markets
Licensed partners
Taxes
Anti-corruption
Data privacy

Employee engagement
Diversity, equity and inclusion
Health and safety
Human rights
Safer gambling

CO2 emissions
Waste management
Sustainability governance

Good governance is essential in helping us to run our business responsibly and to meet the ambitious goals in our strategy.

The governance of Better Collective’s sustainability efforts defines the role of the Board and its Committees as well as specifying the powers the Board delegates to our Group Management.

We rely on clear terms of reference for the sustainability board to support and advise us as we put our strategy into action. To further the sustainability agenda, we have put in place a DEI board and a safer gambling board to address these matters across our organization, gathering expertise from relevant teams. The insights from these groups feed into the Group Management and Board’s decision-making.

The Board of Better Collective

Our Board is a diverse one in terms of gender and nationality. Members have expertise that includes wide-ranging board and leadership experience as well as specific skills such as understanding of sustainability, finance, the igaming industry, technology and digital.

The Board has ultimate responsibility for reviewing, monitoring and guiding the strategy of Better Collective, as well as its conduct. Our Board members provide constructive challenges, strategic guidance and specialist advice, bringing their diverse experience to our discussions and decision-making.

The Board has overall accountability for the management and guidance of risks and opportunities, including those associated with aspects of sustainability, such as operating a compliant business, promoting safer gambling, implementing socially responsible conducts, environmental responsibility, and ethical behavior.

See risk management on p. 29 for sustainability risks.
Social

Our people
It is our long-term commitment to foster and uphold an inclusive and diverse workplace by implementing socially responsible conducts and eliminating all discriminatory practices.

Our business is based on specialized expertise and innovation, this is why we see people as a core element in everything that we do. We believe it is crucial to consistently cultivate an inclusive and diverse employment environment that promotes the rights of the individual. These efforts support the SDG 8 in promoting inclusive, sustainable, and productive employment for everyone at Better Collective.

Onboarding and learning
New employees, including those welcomed from acquired companies, are introduced to Better Collective and our policies through an extensive onboarding program. We conduct biannual development dialogues between manager and employee to discuss performance and further development for each individual employee. Our leadership development initiative ensures the continuous professional development of our managers to match the ever-changing nature of our business. The 2021-2022 program, consisting of 6 seminars, was attended by approximately 100 managers across offices. By supporting the professional and personal development of our managers, we enable them to identify and deal with challenges in their respective teams. Ultimately, such initiatives ensure the well-being of all employees and make Better Collective an attractive and respected workplace.

Measuring our work culture
We conduct an annual workplace survey, and the 2022 results indicated a healthy and effective work environment with engaged and highly motivated employees. Our engagement score of 83% (2021: 87%) is high though fluctuating year to year which may also reflect our continuous growth by new hires and entire teams through acquisitions. The survey returned an unsatisfactory number of harassment cases (11 in 2022 against 9 in 2021). As the survey is anonymous, we can only investigate the cases that are also reported to HR of which we have had none that were considered severe. During the year we implemented anti-harassment training to educate all employees and encourage them to come forward if they experience harassment of any kind for the matter to be dealt with. We will strive to increase openness while working to bring down the number of cases. We recognize the risk for the well-being of the employees exposed to harassment of any kind as well as for our work environment.

Health and safety
We give priority to health and safety at work in compliance with the regulations and standards in the countries in which we operate. We run local health and safety initiatives to assess health and safety risks and to generate preventive solutions. The health and safety committee issues guidelines, performs workplace evaluations, and maintains the fire instructions and evacuation plan. We have implemented a more flexible working schedule as working from home (WFH) has proven efficient for most of our employees, both in terms of productivity and improving the work-life balance. We follow and adhere to the guidelines set out by the authorities where applicable. Depending on local customs, our offices provided employees with internet allowance, IT equipment and office furniture. In this way, we make sure they have the best physical conditions at their home office. We had no reported cases of workplace injuries in 2022 (2021: 0).

▶ Sustainability policy

▶ Code of Conduct
Diversity and inclusion, cf. §107d
In our business practices and in relation to the composition of our management we aim to level the playing field through gender awareness in recruitment and retention, equal pay, and equal access to training while upholding a zero-tolerance policy against harassment at the workplace. As stated in our diversity manifesto, we are committed to building a diverse team and inclusive culture. Diversity spans across many dimensions, including ethnicity, seniority, nationality, age, gender, education, and religion. Better Collective aims to offer equal opportunities to everyone across our organization and sound policies and benefits are in place for the promotion of diversity and equality. Our Diversity, Equity, and Inclusion (DEI) board involves our employees through employee resource groups in these efforts. It is management’s view that the policies are met, as the criteria on diversity and inclusion has taken basis for selection of the board of directors and the other managerial positions in 2022.

Gender distribution
Better Collective is part of a male dominated industry, both in terms of tech and sports betting. To acknowledge this challenge and to further the positive development of SDG 5, diversity and inclusion initiatives have been on our agenda for 2022. To secure that policies are met, 2022 initiatives included awareness of possible bias in our recruitment processes, including training for hiring managers, job ad terminology, and screening. By the end of the year Better Collective group counted 29% of the underrepresented gender (women) against 30% in 2021 which means we have not made progress towards our goal of reaching 35% by 2030.

Gender distribution in management, cf. §99b
Better Collective has set a target for the board of directors of 35% of the underrepresented gender. The board is made up of two women (33%) and four men (67%) whereby the split is the number that comes closest to 40% without exceeding 40% in a board consisting of six members. This is considered an equal gender distribution by the Danish Business Authority. The board has adjusted the target from 35% to 40% from the year 2023. It is management’s view that the board composition meets our policy on additional diversity criteria based on age, nationality, and educational background.

For the other management levels in the company, the gender split in 2022 was 12% women and 88% men. This is a decline from 2021 (17% women and 83% men), though it is partly due to a change in reporting: In preparation for new rules in the Danish Companies Act coming into force in 2023, other management levels include the executive management and their direct reports, which brings the group from six in 2021 to 17 in the 2022 reporting. The technical reasons aside, Better Collective recognizes that gender distribution at the other management level is unsatisfactory. Recruitment and promotion of managers in 2022 did not improve the gender distribution although this was the aim. We will continue the work to increase the share of the underrepresented gender at all management levels through new initiatives to ensure that both genders are represented in recruitment at the interview stage and similarly that gender is considered in succession planning. The board has set a target for the other management levels of 25% to consist of the underrepresented gender by 2027.

Collaboration and commitment to further gender equality
We recently joined the All-In Diversity Project which is an industry-driven initiative to benchmark diversity, equality, and inclusion for the global igaming sector. We are proud to join as the first non-sportsbook founding member alongside the likes of Entain, Caesars, Betsson, Flutter and Kindred, to provide guidance and support sharing best practices and resources.

We have further shown our commitment to gender equality in signing both the Confederation of Danish Industry’s (DI) Gender Diversity Pledge along with the UN’s Women Empowerment Principles. The job market is to this day still quite gender-imbalanced and that curbs developments in businesses as well as society. The business community plays a large role in the battle to create a more inclusive society and by joining these initiatives we take part in identifying and taking measures that can make businesses more diverse.

In support of
WOMEN’S EMPOWERMENT PRINCIPLES
Established by UN Women and the UN Global Compact Office

We’ve signed
THE GENDER DIVERSITY PLEDGE
for diversity, equality, and inclusion

Collaboration and commitment to further gender equality
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Human rights
Better Collective persistently strives to be a responsible corporate citizen, which entails respecting human rights and supporting the protection as well as advancement of human rights. To solidify our commitment, we implemented a human rights policy in early 2022. We have taken the first steps to establish an ongoing human rights due diligence process to move us from commitment to action. So far, we consider our salient human rights issues to relate to our own workforce as currently addressed and mitigated by measures mentioned in the previous pages.

Recently, we have joined hundreds of companies across the globe in UN Global Compact’s Business & Human Rights Accelerator to further our learning and implementing best practices in Better Collective. We recognize that failure to comply with human rights and principles constitutes a risk to those potentially impacted as well as a reputational risk to the company.

Our Academies on tech and marketing
Since 2021, we have been running BC academies in Niš, Serbia, which targets the local youth by encouraging them to enroll in one of the education programs tailored by Better Collective.

Having our own, specially designed training delivered in the form of the SEO (search engine optimization), SEM (search engine marketing), WordPress, fullstack, and quality assurance academies is a key long-term play in ensuring Better Collective can continue to hire best-in-class talents, who already come equipped with the skill sets required and can hit the ground running.

Not only is the academy beneficial to Better Collective, but it also provides an alternative education and subsequently career opportunity for the youth in Niš. By educating the local youth in tech and marketing we also contribute to lowering the general unemployment rate in Serbia. It is a true win-win situation being able to give back to the community while furthering our own competitive edge. In 2022, we enrolled a total of 33 participants across the five subjects.

>The academy gives young people a chance to discover areas of business that otherwise would be inaccessible. Considering that many jobs today do not require traditional education, it can be difficult to enter these fields or gain enough experience. This is exactly the opportunity Better Collective’s academies provided me with.”

Milena Jeremic
PPC Campaign Assistance and Academy graduate
Our users

For our users, our long-term commitment is to promote safer gambling through education. Ultimately, the focus on safer gambling and being a responsible business is what grants us our social license to operate.

As a digital sports media group, we derive a significant part of our revenues from our users' engagement in sports betting with our sportsbook partners. Better Collective views sports betting purely as a form of entertainment and wants to make sure that sports fans and employees' betting experiences remain as a form of fun and entertainment. In 2022, we have increased our efforts internally by updating our safer gambling policy and implementing training programs to support a safer approach to betting.

Safer gambling resources

We want to ensure that our users are better suited to navigate the iGaming world by visiting a Better Collective website before registering an account with a sportsbook. We focus on the teaching of strategies and the presentation of insightful information and data to make our users more confident in their betting. However, we do not, and cannot, guarantee winning – and we will never claim to do so. As Better Collective is not a sportsbook, we rely on our partner operators to scan for user behavior and take action when a sports fan shows signs of at-risk or problem gambling behavior.

We can educate sports fans, e.g., by making sure that they know the legal gambling age, of possible adverse effects of gambling, and prevention. By taking responsibility in protecting end-users from potential negative health-impacts - in this case gambling addiction - and by promoting mental health and well-being through various initiatives, it is our goal to aid the positive advancement of SDG 3.

We offer safer gambling resources on our websites, as well as a Betting Academy to educate users. For our employees, we rolled out an updated safer gambling policy in 2022 and launched safer gambling training which will continue in 2023. We have implemented the Gamalyze software on our internal employee platform and we encourage all employees to take the test at least annually.

Collectively we are better

We strongly believe that the long-term sustainability and growth of the sports betting industry is dependent on responsible operations. Evidently, this is not achieved by a single business, but rather by a collective effort across the industry. This is why Better Collective in 2019 entered into a partnership with our peers Racing Post and Oddschecker to co-found the UK based trade association, Responsible Affiliates in Gambling (RAiG).

Through RAiG we promote socially responsible marketing of gambling products and a safer gambling environment for users. As a condition of membership in RAiG, each member is subject to an annual social responsibility audit which is conducted by an independent third party. Again, this year we participated in the Safer Gambling Week, a cross-industry initiative to promote safer gambling in Europe.

Similarly, we are active members of various national associations, one of which is the Danish Online Gambling Association (DOGA). Through DOGA we work to initiate dialogue between all stakeholders in the gambling industry to secure a responsible and safe gambling market in Denmark and other countries. We are also members of the German Association for Telecommunication and Media (DVTM) and the US National Council on Problem Gambling (NCPG).
Creating safer customer journeys with Mindway AI

Mindway AI is an award-winning company that develops state-of-the-art software solutions for fully automatic monitoring and profiling of gamblers and for identifying, preventing, and intervening in at-risk and problem gambling.

Mindway AI plays an increasingly important role in the iGaming ecosystem supporting operators on a global scale to create safer (Gaming) experiences. This supports our ambition to make betting safer: while we can’t control what operators do, we support them by holding them to high standards during the customer acquisition process and by providing them with a chance to set the bar higher and take initiative in developing sustainable gaming through Mindway AI tools and software. That way, we are extending our influence in the value chain rather than focusing only on our own area.

Early detection of at-risk and problem gambling

Mindway AI partners with operators and leading industry organizations with a clear mission to improve player protection in the gambling industry. By combining neuroscience, AI and human expert assessment, the safer gambling software helps operators meet and exceed player protection requirements. The award-winning AI solution GameScanner ensures a fully automated, early detection of at-risk and problem gambling, allowing operators to reach out to players before unhealthy gambling habits escalate.

This way, we make a real difference for millions of players around the world. GameScanner is already running in nearly 40 jurisdictions in 20 countries boosting operators’ player protection, scanning a total of 6.5M active players per month.

Gamified reinvention of the self-test

Gamalyze is an award-winning, gamified reinvention of the self-test, making self-testing more user-friendly, engaging, and actionable than typical player questionnaires. Gamalyze helps players develop self-awareness of their risk profile and their decision making when they engage in gambling. Drawing in insights from neuroimaging, Gamalyze analyzes each user’s decision while they play and generates a report with feedback on the player’s strategy and their sensitivity to rewards and losses. It also includes advice tailored to the individual user.

Making good use of Mindway AI expertise and tools

Mindway AI and Better Collective share common goals for safer gambling, and while Mindway AI is run as an independent business, we make good use of the expertise and tools available when offering safer gambling resources on Better Collective platforms. Gamalyze is available to our users on key websites together with insightful articles on safer gambling authored by Mindway AI experts.

We recognize that working in an environment where gambling is normalized makes our employees more exposed to gambling and therefore at a higher risk when it comes to problem gambling. Gamalyze is available to all employees, and we remind everyone at least annually to test their gambling behavior along with training and awareness activities. Furthermore, meeting colleagues across the Group, Mindway AI helps create awareness on safer gambling at internal events and on our Safer Gambling Board.
Governance

It is our long-term commitment to comply with applicable legislation in the countries in which we are active, and work against corruption in all its forms.

At Better Collective, we believe that corporate sustainability starts with our value system and a principles-based approach to doing business. This is reflected in our business ethics where we conduct business in compliance with applicable laws, regulations, and standards. We are subject to a variety of national compliance regulations in the countries where we operate, and to aid in developing a sustainable iGaming environment we solely operate in regulated markets or markets where sports betting is accepted by the authorities.

We seek to develop editorial guidelines, which ensure balanced and compliant marketing messages and include proper segmentation for our activities across different channels using marketing technology to avoid targeting the wrong audience.

Regulation of markets

As sports betting becomes more widespread, more countries are amending or implementing new gambling laws and regulations to protect users and to limit black market activities. We have processes for being continuously updated on regulation and applying for licenses where relevant. Our in-house legal team is also dedicated to this area, with compliance processes for our websites.

Commitment to compliance

For the fourth consecutive year, Better Collective was awarded for its efforts within compliance at the Vixio Global Regulatory Awards. We seek to educate regulators, politicians, and users on what performance marketing is, what it entails, and to ensure that relevant standards are set for our industry.

We do not engage in cryptocurrency payments. When partnering with operators and reviewing acquisition targets, it is an integrated part of our due diligence process to pay careful attention to any signs of money laundering or fraud - in case of which we choose not to engage.

The Russian invasion of Ukraine caused us to suspend business activities related to the Russian market which was predominantly advertising activities. The impact on our business is limited at an estimated full-year effect on revenue and earnings of approximately 1-2 mEUR in 2022. Better Collective fully supports the sanctions and the signal from corporations in suspending activities.

Anti-bribery and corruption

Better Collective condemns the acts of corruption and bribery. Not only are they illegal; they also pose a threat to our trustworthiness and a risk to our partners, users, and authorities. Our policy on anti-bribery and corruption is included in our Code of Conduct and was updated in 2022 and implemented across the Better Collective group. We aim for 0 reported cases of bribery and corruption, including any behaviors that abuse entrusted power for private gain in Better Collective.

Our whistleblower scheme facilitates anonymous reporting, and we encourage all employees to speak up if they find something to be in breach of our policies. During 2022, we have not received any reports about bribery, facilitation payment, or other forms of corruption nor have we received any other whistleblower reports.

Code of Conduct

Throughout our organization we promote our Code of Conduct as a guide for all employees on the standards and values of a compliant and responsible business. The Code of Conduct also outlines that all employees are to report on gifts, meals, and entertainment (received and offered) to track and prevent conflicts of interest. Our efforts within governance advance overall sustained, inclusive, and sustainable economic growth while they also secure full and productive employment and decent work for our employees - all of which support SDG 8.

Data ethics report

We have developed a policy for data ethics in light of Section 99d of the Danish Financial Statements Act and this section serves as our report on data ethics for the financial year 2022. The data ethics policy outlines a set of data ethics principles that support ethical decision making when using data across Better Collectives activities. We employ data to provide our users with a unique and educational experience whenever they visit our websites and/or engage in our communities. To give our users the best and most relevant experience possible, we process various categories of data including user-related data and personal data. In 2022, we adjusted the data ethics policy. Planned activities for 2023 include establishing a process and governance setup to handle and evaluate data ethics reporting.
Environment

Better Collective has always been committed to making responsible decisions across all operations - this is also the case when it comes to our impact on the environment.

It is our long-term commitment to implement a precautionary approach to environmental challenges and minimize our carbon emissions. As we are an online business, our environmental impact is relatively small. Climate changes generally pose little risk to our current and future operations as we have no physical supply chain, and as such, we can operate almost anywhere. Still, we aim to minimize our carbon footprint and we are working towards setting a reduction target. Our environmental policy is included in our sustainability policy.

Key emissions factors

Business travel is one of BC’s principal sources of carbon emissions and has a significant impact on our ambition to lower our carbon footprint. When making travel decisions, the environmental and economic impacts must be taken into account and weighed against the expected benefits of meeting in person. The booking principles, including low-carbon options, are included in the Better Collective Travel Policy.

Besides travel, server hosting, IT and office equipment, and food supplies make up most of our carbon intense procurement. When choosing suppliers, considerations of environmental factors must be considered. In 2022, we started including server hosting in our scope 3. Our range of websites is hosted at data centers with a conscious approach to the environment and a significant purchase of renewable energy (92% of estimated emissions in 2021-2022). Our next steps in scope 3 mapping include our procurement of IT and office equipment as well as food supplies.

Garbage with a significant negative environmental effect (such as batteries, IT equipment, etc.) should be reused when possible or disposed of according to governmental recommendations. Old IT equipment, to an increasing degree, is disposed of by a third party based on environmentally responsible practices (where available) or re-used for private purposes by employees. Food waste should be kept to a minimum. We do so by working with our caterers and regulating our consumption daily.

The Sustainable Beekeeping Initiative

Better Collective Serbia had the opportunity to participate in an exciting urban beekeeping project. We placed one of our beehives in a business apiary in Belgrade. The project was collaborative, with Nordic Business Alliance companies playing a significant role in its implementation.

While the project produced some delicious honey, our involvement extended far beyond that. We saw this as an opportunity to learn from the bees and incorporate their work into our business practices. We shared this knowledge with our employees and partners to help promote sustainable and environmentally friendly practices throughout our industry.

The project lasted throughout the year and concluded this spring. We are proud to have been a part of such an initiative, and our involvement helped to impact both our industry and the environment positively. We’re also planning to continue exploring ways to incorporate what we’ve learned into our business practices in the future.
Social metrics

The data in the following accounts is based on information registered in and retrieved from HR’s software system. Our continued growth through M&As means that newer offices are not accounted for with the same accuracy as our long-standing operations.

Average number of full-time work force (FTE)
The average number of full-time employees as stated in the annual accounts 2022.

Total headcount (HC)
The total headcount by the end of 2022.

Gender diversity
The percentage of the underrepresented gender (women) in the workforce at the end of 2022.

Gender diversity top management
The percentages of the underrepresented gender (women) at the other management levels (in addition to the board of directors) at the end of 2022. Note the change in principle from 2021 to 2022: In preparation for new rules in the Danish Companies Act coming into force in 2023, other management levels include the executive management and their direct report, which brings the group from six in 2021 (executive management and SVP/VP) to 17 in the 2022 reporting.

Gender pay ratio
The gender pay ratio is calculated as the median male salary divided by the median female salary (the underrepresented gender), per country and collated as a weighted average for the group. Salaries include pension and excludes bonus, incentive programs and other benefits. The 2019 and 2020 figures have been recalculated.

Employee turnover
Employee turnover is defined as voluntary and involuntary leaves (headcount) divided by the number of employees and converted to a percentage rate. Resignations and dismissals have been specified and added in the 2022 reporting.

Sickness absence
The number of sick days for all HCs for the period divided by total HC. Action Network was left out of the calculations as it was not possible to gather information on sick days.

Employee engagement and response rate
Based on the average responses to five specified questions in our better workplace evaluation 2022.

Reported cases of harassment
Based on anonymous reports in our better workplace evaluation. The nature of harassment is unknown.

Reported workplace injuries
Number of reported workplace injuries as reported to HR.

Nationalities
Number of nationalities.

Corporate income tax
Total income tax for 2022.

<table>
<thead>
<tr>
<th>Social</th>
<th>Unit</th>
<th>Target</th>
<th>2022</th>
<th>2021</th>
<th>2020</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Average number of FTE</td>
<td>FTE</td>
<td>878</td>
<td>635</td>
<td>420</td>
<td>364</td>
<td></td>
</tr>
<tr>
<td>Total headcount</td>
<td>HC</td>
<td>949</td>
<td>781</td>
<td>476</td>
<td>428</td>
<td></td>
</tr>
<tr>
<td>Gender diversity</td>
<td>%</td>
<td>35</td>
<td>29</td>
<td>30</td>
<td>31</td>
<td></td>
</tr>
<tr>
<td>Gender diversity top management</td>
<td>%</td>
<td>35</td>
<td>12</td>
<td>17</td>
<td>17</td>
<td></td>
</tr>
<tr>
<td>Gender pay ratio</td>
<td>Times</td>
<td>1</td>
<td>1.10</td>
<td>1.19</td>
<td>1.20</td>
<td>1.39</td>
</tr>
<tr>
<td>Employee turnover ratio</td>
<td>%</td>
<td>18.25</td>
<td>16.86</td>
<td>21.15</td>
<td>13.79</td>
<td></td>
</tr>
<tr>
<td>- Resignations</td>
<td>%</td>
<td>12.33</td>
<td>14.96</td>
<td>10.46</td>
<td>9.38</td>
<td></td>
</tr>
<tr>
<td>- Dismissals</td>
<td>%</td>
<td>5.93</td>
<td>1.90</td>
<td>10.68</td>
<td>4.41</td>
<td></td>
</tr>
<tr>
<td>Sickness absence</td>
<td>Days per HC</td>
<td>2.37</td>
<td>1.12</td>
<td>1.13</td>
<td>2.04</td>
<td></td>
</tr>
<tr>
<td>Employee engagement</td>
<td>%</td>
<td>80</td>
<td>83</td>
<td>87</td>
<td>85</td>
<td></td>
</tr>
<tr>
<td>Employee engagement response rate</td>
<td>%</td>
<td>80</td>
<td>75</td>
<td>91</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Reported cases of harassment</td>
<td>Number</td>
<td>0</td>
<td>11</td>
<td>9</td>
<td>12</td>
<td></td>
</tr>
<tr>
<td>Reported workplace injuries</td>
<td>Number</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Nationalities</td>
<td>Number</td>
<td>43</td>
<td>35</td>
<td>30</td>
<td>30</td>
<td></td>
</tr>
<tr>
<td>Corporate income tax</td>
<td>mEUR</td>
<td>16.89</td>
<td>12.60</td>
<td>6.00</td>
<td>5.00</td>
<td></td>
</tr>
</tbody>
</table>

▶ Tax policy
Governance metrics

Gender diversity, board
Percentage of the underrepresented gender (women) on the board of directors elected at the Annual General Meeting. The board has a 67% (men) and 33% (women) split, which is the number that comes closest to 40% without exceeding 40% in a board consisting of six members and thereby considered an equal gender distribution by the Danish Business Authority. The target figure of 35% was reached in 2021. To signal a continued commitment to gender diversity, the board has increased the target from 35% to 40% from the year 2023.

Board meeting attendance rate
Percentage of board meetings attended per board member including board committee meetings (Audit committee and Remuneration committee respectively).

Breaches of customer privacy
Number of complaints for the breach of consumers’ privacy including complaints from official data protection authorities. Any complaints under investigation will be included once investigation is finalized.

Reported cases of bribery or corruption
Number of cases reported to HR, in the whistleblower scheme or otherwise.

Whistleblower reports
Number of whistleblower reports received in 2022.

CEO pay ratio
CEO pay ratio is calculated as the CEO salary including bonus, pension and warrants divided by the median employee salary. Note that in 2020, the CEO waived his base salary in the second quarter in light of the COVID-19 pandemic impact.

<table>
<thead>
<tr>
<th>Governance</th>
<th>Unit</th>
<th>Target</th>
<th>2022</th>
<th>2021</th>
<th>2020</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gender diversity, board</td>
<td>%</td>
<td>35</td>
<td>33</td>
<td>33</td>
<td>17</td>
<td>20</td>
</tr>
<tr>
<td>Board meeting attendance rate</td>
<td>%</td>
<td>&gt;95</td>
<td>99</td>
<td>96</td>
<td>97</td>
<td>100</td>
</tr>
<tr>
<td>Breaches of customer privacy</td>
<td>Number</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Reported cases of bribery or corruption</td>
<td>Number</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Whistleblower reports</td>
<td>Number</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>CEO pay ratio</td>
<td>Times</td>
<td>12.61</td>
<td>10.27</td>
<td>9.27</td>
<td>9.12</td>
<td></td>
</tr>
</tbody>
</table>
Our Carbon emissions

Direct Emissions from Operations
- site gas, company car travel

Indirect Emissions from purchased electricity
- electricity generation, district heating generation

All other emissions in the company value-chain
- flights, commuting, server hosting

**Scope 1**
10.00 tCO₂e

**Scope 2**
50.32 tCO₂e

**Scope 3**
1,362.50 tCO₂e
Environmental metrics

Environmental data covers our 21 sites across 11 countries.

The GHG report has been prepared in accordance with Part 1 of ISO 14064: 2018. The GHG inventory, report, or statement has not been verified. The GHG calculation and report has also been prepared in accordance with The Greenhouse Gas Protocol Corporate Standard. The GHG inventory, report, or assertion has not been separately verified. The carbon footprint appraisal is derived from a combination of our own data collection and data computation by Carbon Footprint’s analysts.

Carbon Footprint’s analysts have calculated Better Collective’s footprint using the 2022 conversion factors developed by the UK Department for Environment, Food and Rural Affairs (Defra) and the Department for Business, Energy & Industrial Strategy (BEIS). These factors are multiplied with the company’s GHG activity data. Carbon Footprint has selected this preferred method of calculation as a government recognized approach and uses data which is realistically available from the client, particularly when direct monitoring is either unavailable or prohibitively expensive.

**CO₂ emissions scope 1**
Scope 1 comprises CO₂ emissions from heating using oil and gas and from the usage of company cars.

**CO₂ emissions scope 2**
Scope 2 comprises CO₂ emissions from heating and electricity supplied by external suppliers.

**CO₂ emissions scope 3**
Scope 3 comprises CO₂ emissions from business travel by public transportation including flights, working from home and employee commutes, as well as district heating distribution and electricity transmission and distribution. Due to the COVID-19 pandemic, we travelled significantly less in 2020 and 2021.

**CO₂ emissions per average**
FTE CO₂ emissions per employee (tons/average FTW) is calculated on the basis of the total amount of CO₂ emissions (tons) and the average number of full time employees (FTE).

**CO₂ emissions per mEUR revenue**
CO₂ emissions per mEUR revenue (tons/mEUR revenue) are calculated based on the total amount of CO₂ emissions (tons) and the revenue in mEUR as stated in the annual accounts 2022.

<table>
<thead>
<tr>
<th>Environmental</th>
<th>Unit</th>
<th>Target 2022</th>
<th>Target 2021</th>
<th>Target 2020</th>
<th>Target 2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO₂ e, scope 1</td>
<td>Metric tons</td>
<td>10.00</td>
<td>73.88</td>
<td>73.53</td>
<td>13.95</td>
</tr>
<tr>
<td>CO₂ e, scope 2</td>
<td>Metric tons</td>
<td>50.32</td>
<td>70.08</td>
<td>49.99</td>
<td>215.14</td>
</tr>
<tr>
<td>CO₂ e, scope 3</td>
<td>Metric tons</td>
<td>1,362.50</td>
<td>346.42</td>
<td>176.88</td>
<td>730.14</td>
</tr>
<tr>
<td>Total tons of CO₂</td>
<td>Metric tons</td>
<td>1,422.82</td>
<td>490.38</td>
<td>300.41</td>
<td>959.24</td>
</tr>
<tr>
<td>Tons of CO₂ per employee</td>
<td>Times</td>
<td>1.62</td>
<td>0.77</td>
<td>0.72</td>
<td>2.82</td>
</tr>
<tr>
<td>Tons of CO₂ per mEUR turnover</td>
<td>Times</td>
<td>5.28</td>
<td>2.77</td>
<td>3.30</td>
<td>15.76</td>
</tr>
</tbody>
</table>
Assessment by scope and source activity

**Flights**
Report from travel provider with manual additions of direct bookings

**Home-workers**
Employee survey, 48% response rate. Apportioned to account for the employees which did not respond.

**Commuting**
Employee survey, 48% response rate. Apportioned to account for the employees which did not respond.

**Hotel stays**
Report from travel provider with manual additions of direct bookings

**Rail, taxi, bus travels and hire cars**
Based on cost and distance

**Electricity transmissions & distribution**
Primarily utility bills. For the sites where electricity consumption information was not available, but other sites are located within the same country with a complete dataset, this was apportioned based on employee numbers at the site with the complete dataset and used the number of staff working at the site

**Server hosting**
Report from server hosting provider, 12 month period from October 1, 2021 to September 31, 2022.

**Water (and waste water)**
Utility bills for all but one office (calculated based on per person consumption in nearby office)

<table>
<thead>
<tr>
<th>Source Activity</th>
<th>2022</th>
<th>2021</th>
<th>2020</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Scope 1</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site gas</td>
<td>9.43</td>
<td>67.50</td>
<td>65.68</td>
<td>1.84</td>
</tr>
<tr>
<td>Company car travel</td>
<td>0.57</td>
<td>6.38</td>
<td>7.86</td>
<td>12.12</td>
</tr>
<tr>
<td><strong>Scope 1 total</strong></td>
<td>10.00</td>
<td>73.88</td>
<td>73.54</td>
<td>13.96</td>
</tr>
<tr>
<td><strong>Scope 2</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Electricity generation</td>
<td>50.32</td>
<td>66.77</td>
<td>49.99</td>
<td>215.14</td>
</tr>
<tr>
<td>District heating generation</td>
<td>-</td>
<td>3.32</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Scope 2 total</strong></td>
<td>50.32</td>
<td>70.09</td>
<td>49.99</td>
<td>215.14</td>
</tr>
<tr>
<td><strong>Scope 3</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Flights</td>
<td>915.48</td>
<td>164.38</td>
<td>126.67</td>
<td>711.84</td>
</tr>
<tr>
<td>Home-workers</td>
<td>144.68</td>
<td>103.69</td>
<td>42.39</td>
<td>-</td>
</tr>
<tr>
<td>Commuting</td>
<td>198.47</td>
<td>62.52</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Rail travel</td>
<td>3.74</td>
<td>8.81</td>
<td>2.34</td>
<td>3.24</td>
</tr>
<tr>
<td>Electricity transmission &amp; distribution</td>
<td>4.76</td>
<td>5.34</td>
<td>2.52</td>
<td>12.37</td>
</tr>
<tr>
<td>Taxi travel</td>
<td>5.36</td>
<td>1.43</td>
<td>1.81</td>
<td>1.68</td>
</tr>
<tr>
<td>District heating distribution</td>
<td>-</td>
<td>0.17</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Bus travel</td>
<td>3.64</td>
<td>0.08</td>
<td>0.01</td>
<td>1.01</td>
</tr>
<tr>
<td>Server hosting</td>
<td>1.60</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Company electric vehicles (charged off-site)</td>
<td>0.61</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Scope 3 total</strong></td>
<td>1,278.34</td>
<td>346.42</td>
<td>176.88</td>
<td>730.14</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>1,338.66</td>
<td>490.39</td>
<td>300.41</td>
<td>959.24</td>
</tr>
</tbody>
</table>
EU Taxonomy

KPI for Revenue
Better Collective’s main activities within sports media and entertainment is excluded from the taxonomy under 13.1 Creative, arts and entertainment activities. To ascertain whether Better Collective has any other economic activities which could be eligible for the taxonomy, the group has made an analysis of the business which has not returned any other economic activities that are eligible under the taxonomy. Better Collective thus reports no eligible revenue for any eligible activities.

KPI for CAPEX
CAPEX is calculated as the ‘Addition of tangible and intangible assets’, which is generated from note 12 and 14 of the consolidated financial statements. Included in the figures is the value from leasing of office buildings (Capitalized under IFRS16). Of the eligible activities, none was assessed as Taxonomy-aligned.

KPI for OPEX
Better Collective has made an analysis of OPEX which has not returned any economic activities that are eligible under the taxonomy.

<table>
<thead>
<tr>
<th>Revenue</th>
<th>Substantial contributions %</th>
<th>Do no significant harm</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Absolute Revenue tEUR</td>
<td>Proportion of Revenue</td>
</tr>
<tr>
<td>Taxonomy aligned activities - none</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Taxonomy eligible but not aligned activities - none</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Taxonomy non-eligible activities</td>
<td>269,297</td>
<td>100%</td>
</tr>
<tr>
<td>Total</td>
<td>269,297</td>
<td>100%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>CAPEX</th>
<th>Substantial contributions %</th>
<th>Do no significant harm</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Absolute CAPEX tEUR</td>
<td>Proportion of CAPEX</td>
</tr>
<tr>
<td>Taxonomy aligned activities - none</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Taxonomy eligible but not aligned activities</td>
<td>7,045</td>
<td>5%</td>
</tr>
<tr>
<td>Taxonomy non-eligible activities</td>
<td>144,522</td>
<td>95%</td>
</tr>
<tr>
<td>Total</td>
<td>151,568</td>
<td>100%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>OPEX</th>
<th>Substantial contributions %</th>
<th>Do no significant harm</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Absolute OPEX tEUR</td>
<td>Proportion of OPEX</td>
</tr>
<tr>
<td>Taxonomy aligned activities - none</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Taxonomy eligible but not aligned activities - none</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Taxonomy non-eligible activities</td>
<td>184,222</td>
<td>100%</td>
</tr>
<tr>
<td>Total</td>
<td>184,222</td>
<td>100%</td>
</tr>
</tbody>
</table>