Safer Gambling Code

Better Collective

Approved by Co-CEOs

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1. Purpose and Background

Better Collective is a global sports media group providing entertaining and engaging platforms for fans of sports and esports. We offer a wide range of editorial content, bookmaker information, data insights, betting tips, iGaming communities and educational tools. Our mission is to excite sports fans through engaging content and foster passionate communities worldwide. Better Collective has an ambitious approach to safer gambling, which will be described in this safer gambling code. For sports betting and gambling to stay entertaining, it also needs to be safe.

The purpose of the code is to define Better Collective's approach to safer gambling and how we work with the main stakeholders to create a sustainable industry. It is our firm belief that cooperation between the public and private stakeholders is key to ensuring a healthy balance between user protection and industry development. Regulatory stability is a key driver of business performance, and that is also why Better Collective is an active contributor to the long-term sustainability of the sports betting and gambling industry.

The code is based on the direction given in the sustainability strategy, which is revised on an annual basis. The code serves as a point of reference when Better Collective develops annual action plans and initiatives to promote safer gambling. Hence, the contents will be more directional than prescriptive.

2. Scope of the Code and Key Definitions

The focus of this code is to define the scope of responsibility for Better Collective when it comes to the development of safer gambling across the iGaming industry. There is no detailed outline of how we regard the responsibility of other stakeholders. The focus is simply to clarify the framework for Better Collective's approach and initiatives to promote safer gambling.

Unless otherwise stated, the direction given in this code applies to all markets and businesses in the Better Collective Group, which derive a majority of their revenues from users undertaking gambling activities with operators. The code applies to all relevant products, regardless of which vertical in iGaming they focus on.

Newly acquired businesses in the Better Collective group also need to adhere to the provisions of this code. Application of this code into the business processes of a newly acquired company is a mandatory component whenever Better Collective acquires a controlling interest in the company. Whenever Better Collective is a minority shareholder, we will seek to promote the standards set out in this code.

A few key terms are important to understand and distinguish in this code. People visiting Better Collective websites are referred to as *visitors* or *users*. When they go on to place a bet with an operator, they become *bettors* or *iGamers*. This does not mean that we are less committed to promoting safer gambling, but rather that we need to work with industry stakeholders to have the highest possible impact.

Safer gambling is another key term. This term is used to describe the industry's approach to limiting the risk of problem gambling and gambling-related harm. In its essence, it means taking different measures by different service providers in the industry to prevent "unsafe gambling", which may occur when bettors:

- Perceive gambling as a stable source of income
- Gamble for larger amounts than what they can afford to lose
- Lose control of their time and funds spent on gambling, etc.

The list is not exhaustive, and these are only examples.

Adverse consequences could be provoked if a person develops gambling disorders, which could include the safety or well-being of gamblers and their relatives being placed at risk.

3 Overview of the Structure of the Code

The table below outlines the structure of the code.

Section 3.1 introduces the fundamental principles behind our approach to safer gambling in Better Collective. The section forms how we communicate around our commitment and guides how we approach working with all relevant stakeholders. Sections 3.2 to 3.6 outline how we approach different groups of stakeholders when promoting safer gambling. Each section outlines the overall approach rather than defines a set of actions. Based on a continuous evaluation of improvement potential, initiatives are scoped and implemented throughout the organisation.

Section	Topic
3.1	Safer Gambling in Better Collective
3.2	How we Promote Safer Gambling to our Users
3.3	How we Promote Safer Gambling with Operators
3.4	How we Promote Safer Gambling with Regulators
3.5	How we Promote Safer Gambling to our External Suppliers
3.6	How we Promote Safer Gambling to our Employees

3.1 Safer Gambling in Better Collective

Better Collective is a leading digital sports media group that, among other activities, connects sports enthusiastic bettors with betting operators through innovative technologies and trusted digital products centred on educational, transparent sports betting content that provides information on Safer Gambling tools and contact details for the relevant bodies which can support individuals suffering from gambling-related harm. In a developing and increasingly complex entertainment market, we consider it our ambition to empower online bettors by developing a more fair, enjoyable, and secure betting experience. This is why our products cover more than 30 languages and attract millions of users worldwide. At Better Collective platforms, users can get access to educational content

around sports betting, and compare odds and bookmakers, while they can also share analysis, tips and the excitement when their favourite team or athlete competes.

On the one hand, we aid users to navigate safely among bookmakers that match their individual needs, and on the other hand, we aim to ensure users' and employees' iGaming experiences remain a form of fun and entertainment. This includes awareness of the fact that gambling should not be seen as a source of income but only be practised as a fun activity. Safer gambling is essentially playing within your limits - being aware of the fact that bookmakers will always win in the long run. We are fully aware that there are users for whom gambling surpasses entertainment and becomes harmful. A sustainable iGaming industry is one in which all stakeholders work together to minimise the risk of gambling-related harm. We are committed to playing an active role in promoting such awareness by advocating for safer gambling.

In conducting our business, we will always seek to act with due care and prudently. As a media group, Better Collective has a unique position to educate bettors before they register an account with a sports betting or gambling operator. We believe actions speak louder than words. We strive to engage with all relevant stakeholders in promoting safer gambling, acting proactively and transparently.

3.2 Products and Users

Our objective is to ensure that Better Collective's users are educated about safer gambling and better suited to navigate the iGaming world by visiting a Better Collective platform before registering an account with a sports betting or a gambling operator. Our guiding principle is that the more time our users spend on our sites reading betting-related content, the bigger the obligation to educate the users on safer gambling. The educational content always stays true to our fundamental belief that gambling should be regarded as entertainment. We do not, and cannot, guarantee winning – and we will never claim to do so.

All our platforms include advice on where to seek help if a bettor experiences gambling harm. We always seek to refer users to acknowledged organisations that take measures to ensure safer gambling. Whenever a user reaches out to us, displaying signs of gambling harm, we always seek to encourage them to get help. We do not offer users personal advice

on gambling disorders, as this would require users' individual sessions with competent professionals. Our sites thus only offer general advice on how to bet responsibly.

We seek to develop editorial guidelines, which ensure balanced and compliant marketing messages. Our core business is pull marketing, where the user is actively seeking specific information about betting. This context is very important to be able to evaluate the appropriateness of the contents. We aim to always describe commercial content as such, through different advertising disclaimers. Similarly, we aim to have the information on how to get help with gambling harm easily located on our sites. In addition, we endorse industry-wide campaigns that seek to inform users about gambling harm and all the underlying risks.

When using social media platforms for advertising, we constantly make sure that all applicable advertising regulations are duly followed, in addition to the social media policies that the platforms may have. Our ambition is to safeguard the end users from potential harm, and we aim to reflect this in the content we curate. We constantly work to provide references to the local safer gambling establishments, while also emphasising the importance of playing responsibly. Apart from that, we aim to implement age-gating and targeting mechanisms, where possible, so our social media pages and posts cannot be reached by minors or other particularly vulnerable groups.

Our aim is to generally include proper segmentation for various Better Collective products and activities across different channels and use all of the available marketing technology to avoid targeting vulnerable and incorrect audiences. This applies to all our activities, not only social media, but paid media, direct marketing, video content, influencer marketing, and esports, as well.

3.3 Operators

Our objective is to work with partners who proactively address safer gambling, given Better Collective's position in the value chain and the aim to educate the users while pointing them towards legal operators.

Hence, we do not cooperate with operators that have unacceptable business ethics - even if it results in a loss of revenue.

As Better Collective is not a sports betting or gambling operator, we rely on our partner operators to scan for user behaviour and take action when a user shows signs of at-risk or behaviour that indicates he/she is affected with gambling harm. However, in the partnerships Better Collective has with operators, there are guidelines on various aspects related to safer gambling and the general sustainability of the industry. Better Collective upholds our partner's compliance and affiliation standards requirements and enters into dialogue with them where we feel they can be further improved.

Better Collective checks that the operator holds relevant licences prior to initiating a partnership in any market. Depending on the local regulation, Better Collective conducts due diligence on those licences. If a market is locally licensed, Better Collective only enters into partnerships with operators holding a valid local licence.

Additionally, Mindway AI (part of the Better Collective Group) specialises in supporting the gambling industry with various safer gambling tools and solutions. 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 gambling. Mindway AI plays an increasingly important role in the iGaming ecosystem supporting operators on a global scale to create safer iGaming 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.

3.4 Regulators

Better Collective engages with regulators where appropriate to ensure sustainable industry development based on prudent regulation, ensuring strong safer gambling protections for as many iGamers as possible. We will always seek to address regulators and authorities in a way which ensures the strongest voice for Better Collective. In many markets, this will be via a collective effort with other industry stakeholders. Our approach will always be based on an

individual assessment of the market and our position. In some countries where we hold an affiliate license (such as Greece and Romania), Better Collective is required to adhere to the licensing conditions, while in other jurisdictions we support the operator's license requirements. However, our objective is to educate the regulators and politicians on who we are and what we do, even in jurisdictions where Better Collective is not required to abide by the licensing requirements directly so that standards can be set for affiliates across the iGaming industry.

The guiding principle for engaging in a dialogue with a regulator in a market will always be business volume. The larger our business is in any market, the larger the potential risk for Better Collective, but also the larger the opportunity to work with industry stakeholders. This means that we will continuously monitor our largest geographical markets and on a regular basis evaluate the need to engage with regulators. For some markets, we will install monitoring of the political dialogue and in others, we will choose to react only if regulation is up for revision.

We strongly believe that the long-term sustainability and growth of the iGaming industry is dependent on responsible operations. Evidently, this is not achieved by a single business, but rather by a collective effort across the industry. As an active member of various industry associations across the globe, Better Collective advocates for a safer iGaming universe through collective industry efforts.

Better Collective is co-founder of Responsible Affiliates in Gambling (RAiG), an independent body set up to help raise standards in the sector, particularly with respect to safer gambling. The association aims to foster wider initiatives in the UK affiliate marketing sector to promote social responsibility and help create a safer gambling environment for consumers. RAiG is in dialogue with the UK regulators to ensure that affiliates' industry knowledge is utilised in the promulgation of regulations to ensure sustainability.

Better Collective led the establishment of the Responsible Gambling Affiliate Association (RGAA) in North America, a pioneering trade body in the region promoting safer gambling standards and advertising.

The Brazilian Institute of Responsible Gaming (IBJR) is committed to fostering a culture of responsible and mindful gambling in Brazil. As an associate of IBJR, Better Collective plays a key role in shaping the country's gaming industry, actively contributing to the promotion of safer and responsible gaming practices.

Better Collective is also a member of the Danish Online Gambling Association (DOGA), which among many other things, works to initiate dialogue between all stakeholders in the gambling industry to secure a safe gambling market in Denmark and other countries.

Better Collective is continuously looking for ways to increase collaboration with regulators as we have done through RAiG, RGAA, IBJR and DOGA. We believe that the industry's sustainability will be significantly strengthened through collaboration and knowledge sharing between the industry's stakeholders.

3.5 External Suppliers

Better Collective assesses external partners with whom we collaborate. In the event that partners do not have a business approach living up to Better Collective's sustainability and safer gambling standards, collaboration with these partners could potentially terminate. This assessment is done based on local rules, legislation, market affairs circumstances and other relevant factors.

When Better Collective works with suppliers and partners on betting-related content, we always make sure to clearly communicate our business standards and expectations to them. This means that we set standards for the conduct of our freelancers and offer them the proper information and education on safer gambling.

When Better Collective works with external partners on the paid media side, we strive to collaborate with platforms that have the necessary targeting options, data sets, and inventory for us to continue to operate responsibly in the iGaming industry. Platforms like these have their own policies around online gambling, which Better Collective is compliant with. Accordingly, Better Collective is not able to run paid media campaigns unless approved by external partners. In its paid campaigns, Better Collective is also able to exclude minors when targeting betting queries on the search and, at the same time, only target markets and states where online gambling is legal. In addition, Better Collective

strives to target only sports-related inventory and content to further ensure that we are promoting in a responsible and compliant manner.

When running paid campaigns on search engine marketing platforms, Better Collective has added numerous negative keywords that could indicate if people exhibit unhealthy gambling behaviour or if they are underaged; and we exclude these searches from seeing our ads, as these people should not be encouraged to gamble.

3.6 Employees

As Better Collective operates within the iGaming industry, the workday for the majority of Better Collective's employees revolves around the field of betting and gambling. When creating content or working with any of Better Collective's assets, employees should consistently have safer gambling in mind. To ensure employees have the right approach to safer gambling, Better Collective educates and promotes the safer gambling concept to its employees through various initiatives.

We have a Group Safer Gambling policy and a customised Safer Gambling training, obligatory for employees to ensure that all employees at Better Collective are aware of the underlying risks as well as to minimise the adverse effects associated with gambling. Our mission is to educate and support all of our colleagues on safer gambling by making information about gambling-related harms and support mechanisms accessible to them. We believe that de-stigmatizing and encouraging people to seek help, as well as supporting any BC employee concerned about their or another team member's risky behaviour, is essential to creating a safe workplace.

Moreover, safer gambling-related content is continuously created in collaboration with external partners as well as internal stakeholders with relevant expertise and insights, e.g. employees from Mindway AI. Content is shared on various channels accessible to employees, including BC Rocks (Better Collective's intranet). Furthermore, BC Rocks includes a safer gambling section with general guidelines on Better Collective's approach to safer gambling, self-tests (Gamalyze), as well as various tools and external links to knowledge on how to recognise gambling-related harm.

If any employees experience gambling-related harm or believe a colleague potentially has gambling-related issues, we urge employees to contact HR or the nearest manager. Every case is handled with confidentiality and individually according to the situation. All employees can also report to Better Collective's Whistleblower scheme if they want to raise a concern.