

Code of Conduct

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1. Why do we need a code of conduct?

A code of conduct serves as an ethical compass that is based on our values and clarifies how we are to behave as business partners, employers, employees and community citizens. All of our relationships are characterized by trust and transparency, simplicity and a product focus.

We are a decentralized organization with employees in many offices in different countries. Furthermore, Vitec is growing through acquisitions, with new employees from various corporate cultures joining the group every year.

Consequently, we need a clear framework in order to live up to our shared brand promise:

To rely on – today and tomorrow.

2. The Code of Conduct applies to all of us

The Code of Conduct applies to all employees and representatives of Vitec. Everyone bears a responsibility to set a good example. Leaders at Vitec are expected to promote a culture whereby it comes naturally to act in accordance with our Code of Conduct.

The Code of Conduct is complementary to applicable laws and regulations and provides the basis of our policy documents. For those who sign agreements with suppliers and partners, we have a supplier code of conduct to use in the contract process.

It is not possible to mention every conceivable situation in a document, which is why it is important to use good judgment at all times.

3. Work environment

Vitec's workplaces are to offer a work environment that promotes good health and development, where the risks of occupational injury and illness are minimized.

Work environment management should be proactive, systematic and integrated into other activities as a natural part of daily work. It covers physical and social as well as organizational aspects.

Vitec is a drug-free workplace. No one, neither an employee, contractor nor other individual, may undertake any work while under the influence of alcohol or drugs.

4. Respect and inclusion

In Vitec, diversity is a natural result of the culture, of being fact based and curious, and showing respect for others. Since we are convinced that differences in background and experience enrich our business, we create a work environment in which everybody feel respected and included.

We do not tolerate any form of violence, harassment, bullying or sexual advances.

All of us have a responsibility to speak up when we perceive something as non-inclusive, disrespectful, unwelcome and/or offensive.

5. Human rights

We commit to respecting all human rights as outlined in international agreements. We uphold the principles set forth in the UN's foundational instruments related to human rights, including the Universal Declaration of Human Rights and International Covenant on Civil and Political Rights.

We recognize the importance of international labor standards as essential components of human rights and we comply with applicable regulations, particularly the International Labor Organization's (ILO) conventions on freedom of association and the right to collective bargaining.

We strictly prohibit child labor, any form of forced or compulsory labor and any activities contributing to human trafficking.

6. Business ethics

We do not accept corruption, bribery or other unfair advantages. The giving or receiving of gifts or other benefits must be moderate in nature and for legitimate business purposes, and advance approval must be obtained from your manager. Never give or receive gifts comprising leisure travel or money.

Hospitality may constitute a method of creating and nurturing customer relationships. However, all company representation must be moderate and pursuant to our values.

Vitec conducts business solely with bona fide players. Our customers and business partners pursue legitimate activities. Consequently, you may not make payments to, or accept payments from, players who are not legitimate business partners. Neither may you accept or make cash payments.

7. Bias and conflict of interest

It is of utmost importance that our customers and the general public fully trust Vitec. One of the prerequisites for gaining such trust is that our actions must never be questionable in terms of disloyalty or partiality due to bias or conflicts of interest.

Consequently, you have an obligation to act professionally, with integrity, and without allowing bias or conflicts of interest to influence your professional decisions. You are also to avoid situations that may be perceived as stemming from bias or conflicts of interest. Decisions are to be based on facts and business reasons, without the influence of relationships. Your actions at or outside of work must not be detrimental to Vitec.

You may not exploit Vitec's resources, time or influence for personal gain.

You are to seek the approval of your manager before engaging in any external activities that could compete with Vitec or entail an impact on your capacity to work at Vitec.

Vitec has a neutral stance concerning political and religious organizations, and the shaping of public opinion. Therefore, you may not use Vitec's logo, name or products in any capacity to shape public opinion.

8. Transparency

We keep our word, both internally and externally. We are to be clear and correct in our accounting and reporting.

All communication is to be based on our values and our Code of Conduct.

Discretion must be used for sensitive information about our employees, products, customers, suppliers and internal affairs. Always consider whether the information you have access to is of a sensitive nature before you spread it. Vitec respects personal integrity and handles personal data in a responsible manner. When publishing on social media, it is crucial that you explicitly distinguish whether you are expressing yourself as a private individual or as an employee of Vitec - think before you post.

Regarding spokesperson in the media, please see the communication policy.

9. Sustainability

Our sustainability efforts are based on our brand promise; To rely on – today and tomorrow, as well as on ecological, social and economic sustainability. We are to act as a facilitator of the needs of today, without compromising the opportunities of future generations.

Our greatest impact is through our products, how we act as a company and our ambition to integrate sustainability throughout the value chain. Through close collaboration, innovation and continuous investments in our products, we help our customers succeed with their ambitions. We operate by a sustainable business model based on long-term profitable growth, creating a culture where sustainable practices and decision-making are integrated throughout the organization.

We are determined to minimize our own impact on the climate and the environment. Therefore, consider sustainability in every decision you make.

Learn more in our sustainability policy, available on our website vitecsoftware.com.

10. Code of Conduct compliance

Although it can be difficult to speak up when you notice that someone is acting incorrectly, doing so will help to strengthen our company and protect your colleagues. If a deviation from our Code of Conduct or legislation should come to your attention, approach your manager or someone you trust. If you are uncertain about applicability, ask your manager.

If for any reason, it is inexpedient to approach your manager or other superior, you can report serious irregularities or misconduct anonymously via a whistleblower system. To

make a report, go to the external website lantero.report/vitec. For more information, please use our guidelines on whistleblowing.

Vitec does not tolerate any form of reprisals against an individual who has reported a deviation in good faith and will take measures against those who contribute to such reprisals. Confirmed violations of the Code of Conduct will be processed in accordance with the Group's internal procedures and applicable national legislation.

If you feel uncertain, ask yourself:

- Is my behavior legal and pursuant to the Code of Conduct?
- Are my actions based on our values?
- Am I treating others as I expect them to treat me?
- Could my actions be harmful to Vitec?
- Would I be willing to stand for such behavior?

Act if you see an issue. Ask if you're not sure.
