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GROUP POLICY

Code of Conduct

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1. Message from the Group CEO

Dear EVolutioners,

To achieve our mission to make our customers successful and provide an excellent user experience for their end-users, we believe it is essential that the people we interact with, whether it is our colleagues, customers or other partners to the Evolution Gaming Group AB (“**Evolution**” or “**we**”), always feel confident that the way we do business does not only comply with applicable legal requirements, but also meets the highest professional and ethical standards.

The Code of Conduct (the “**Code**”) describes the principles and standards of Evolution’s business ethics and norms and is intended to assist all employees in meeting the high standards of personal and professional integrity by describing what behaviour is expected from each one of us.

Leading by example is critical; managers must, through their actions, demonstrate the importance of compliance with applicable laws and regulations as well as Evolution’s governing policies, including the Code.

Please join me in making a commitment to uphold the Code by applying these principles and standard in your daily work and act on any violations by reporting such through the dedicated reporting channels.

Martin Carlesund
Group CEO

2. Purpose of the Code

As a world leading provider of Live Casino solutions Evolution is committed to corporate responsibility and legal compliance throughout all aspects of our business. To us this means committing to responsible gaming, transparency in all of our dealings, being an admire employer and acting honestly and professionally with integrity. Further, Evolution recognises that in fulfilling its commitment to provide returns for its shareholders, consideration must be taken to Evolution’s wider social and environmental impact on its stakeholders.

To ensure that we comply with applicable laws and regulations and that our set values and desired ways of business are communicated and followed throughout the entire organisation, we have developed a number of governing documents, including the Code.

The purpose of the Code is to develop and maintain standards of ethical behaviour that is acceptable to Evolution and its stakeholders. The Code describes how to fulfil these standards in your everyday work situations and provides guidance for how we are expected to act as a company and as employees.

The Code is applicable to all employees, officers and directors of Evolution worldwide and we expect strict compliance with all the norms set out herein. Moreover, we expect our customers, suppliers and business partners to adhere to standards similar to those reflected in the Code in the conduct of their own businesses.

Where relevant, the Code refers to more detailed policies at corporate and/or local level. If any local policies and guiding documents vary from, or are, contradictory to the Code, the Code shall prevail.

3. Responsible Gaming

Evolution is committed to promote responsible gaming practices as well as highlighting the awareness of gambling problems. We believe it is our responsibility to offer a safe gaming environment without compromising the in-play experience for our customers' end-users.

Evolution requires its licensees to adhere to responsible gaming practices through its license agreements and provides training for all relevant categories of employees on how to detect high-risk behaviour and other issues related to responsible gaming. Evolution also promotes the responsible marketing of Live Casino games and supports the Code of Advertising Gaming and Gambling developed by the UK sector organisation CAP (Committee of Advertising Practice).

4. Employment

Evolution strives to be an attractive employer offering competitive salaries and benefits programs, a challenging and social working environment and considerable development opportunities. The company operates under the notion that a strong corporate culture, which promotes both a positive employee experience and keeps the customer and the end user at the core, is what ultimately brings the unique Live Casino experience that Evolution offers.

4.1 What our employees can expect from us

- Provision of a safe, clean and comfortable working environment to achieve wellbeing, personal integrity and proper work performance for our employees. Evolution shall, at all times, comply with applicable labour laws, regulations and occupational health and safety laws and regulations.
- Ensuring compliance with applicable local laws with regard to processing employee and customer data.
- Incorporating equality and diversity efforts as an integral part of day-to-day operations and throughout all aspects of employment.
- Offer an inclusive workplace where every individual is valued and has similar access to working conditions, compensation and benefits as well as possibilities and career opportunities regardless of age, disability, ethnicity, gender, nationality, religion or other belief system, sexual orientation or transgender identity or expression.
- We do not tolerate any kind of discrimination, harassment, bullying or other forms of victimisation.

4.2 What we expect from our employees

We expect all our employees to:

- Act within applicable laws and regulations as well as Evolution's core values and desired ways of conducting business.
- Assume personal responsibility for performing your duties in a professional way with honesty and integrity.
- Avoid any behaviour that is unlawful or seen as unethical and/or inappropriate. Such behaviour can involve, but is not limited to, fraud, misuse of company assets and

corruption in all its forms, including extortion, bribery, money laundering or terrorist financing. No such illegal activity is tolerated in action nor as negligence. We expect full compliance with connected policies such as the Anti-bribery and Anti-corruption Policy and the Anti-Money Laundering and Counter Terrorist Financing Policy.

- Avoid any personal, financial or other interest (whether related to you or any individual or entity closely associated with you) which may be in conflict with your duties and responsibilities towards Evolution.
- Do not enter into or promote any contractual relationship between Evolution and an individual or entity closely associated with you without first having:
 - (a) informed Evolution about your relationship with the contracting party; and
 - (b) received a written approval to defer to this standard from your immediate superior manager.
- Comply with the anti-bribery and anti-corruption requirements set out in Evolution's Anti-bribery and Anti-corruption Policy.
- Avoid disclosure of company information or information obtained through your employment other than in the proper course of your work.
- Do not gamble for real money on our products at any of our customers gambling sites without your immediate superior manager's written approval.
- Have a personal responsibility to at all times promote an equally inclusive and safe working environment free from any kind of discrimination or harassment.
- Quickly report suspected breaches of the Code or other concerns to relevant local supervisors, managers or through the [Whistle-blower Procedure](#). Retaliation against anyone for raising a concern is not tolerated.

5. External Stakeholders

We constantly strive to better understand the impact of Evolution's business along our entire value chain and keep a dialogue with our stakeholders to address areas of improvement and create mutual value. Furthermore, we seek productive, ethical and transparent relationships and procurement processes with customer, suppliers and other business partners and expect them to have similar principles as set forth in the Code. To uphold these standards, we must:

- Carry out appropriate due-diligence checks before engaging new customers, larger suppliers or business partners.
- Act honestly, ethically and professionally when interacting with customers, suppliers and business partners in our everyday business activities.
- Uphold responsible and ethical sales and marketing practices of our products and services.
- Respect and maintain confidentiality with regard to privacy and commercial trade secrets of our customers, suppliers and business partners.
- Strive to avoid conflicts of interest with our customers, suppliers and business partners, both as individuals and as a company.
- At all times comply with applicable anti-bribery and anti-corruption laws and regulations in our dealings with customers, suppliers and business parties, please see further under paragraph 6 below and the Anti-bribery and Anti-corruption Policy.

5.1 Responsibility to Shareholders

We shall always strive towards the overarching goal of giving our shareholders a sustainable, favourable total return on their investment. As a listed company, Evolution will provide accurate and up-to-date information about its business, results and financial condition to all shareholders in accordance with applicable stock market regulations.

5.2 Inside Information and Insider Dealing

Each employee, officer and director of Evolution shall comply with all applicable securities laws, including insider dealing and stock tipping rules and regulations. No employee, officer or director may disclose inside information (internally or externally) or use inside information to trade or influence the trading of securities of Evolution. Inside information is information of a precise nature, which has not been made public, relating, directly or indirectly, to Evolution or to one or more of its financial instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments or on the price of related derivative financial instruments. For further information, please see the Insider Policy.

6. Anti-bribery and Anti-corruption

Evolution is committed to observing the standards of conduct set forth in the United Kingdom Bribery Act 2010, the United States Foreign Corrupt Practices Act and the applicable anti-bribery and anti-corruption laws and regulations of the countries in which we operate.

Bribery is the offering, providing, authorising, requesting, accepting or receiving of a financial or other advantage to encourage improper performance or to misuse a person's position. A bribe can be anything of value and does not necessarily involve money.

Corruption is the abuse of an entrusted power for private gain. This implies not only financial gain but also non-financial advantages. Examples of corruption are bribes, fraud, facilitation payments and nepotism.

No employee, officer or director of Evolution shall offer, provide, authorise, request, accept or receive a bribe, either directly or indirectly. Further, it is prohibited to contribute financial or non-financial means to any third party in a way that could constitute corruption.

For more information, please see the Anti-Bribery and Anti-Corruption Policy. Each employee must notify the Chief Legal Officer as soon as possible if he/she believes or suspects that a conflict with the Anti-Bribery and Anti-Corruption Policy has occurred or may occur in the future.

7. Anti-money Laundering and Counter Terrorist Financing

Evolution applies robust and consistent anti-money laundering and counter terrorist financing standards and procedures to prevent use of its businesses for purposes of facilitating the transfer of any proceeds derived from criminal activity or from an act of participation in such activity ("**Money Laundering**") or the provision or collection of funds, by any means, directly or indirectly, with the intention that they be used or in the knowledge that they are to be used, in full or in part, in order to carry out any terrorist act ("**Terrorist Financing**").

Evolution is committed to identify and manage the Money Laundering and Terrorist Financing risks that it is exposed to and to take proportionate measures required to manage these risks across all jurisdictions in which it operates. Each employee must remain vigilant to the risks of and are aware of their personal obligations to file an internal report where they have suspicion, knowledge or reason to believe that a customer or other party may be involved in Money Laundering or Terrorist Financing. For further information, please see the Anti-Money Laundering and Counter Terrorist Financing Policy.

8. Competitors and Community

Evolution is committed to vigorous but fair competition that is based on the added value of our products and services. Laws protecting competition, especially anti-trust laws and other regulations regulating competition, shall be observed. Companies and employees must never engage in any anti-competition activity.

We believe that supporting the communities in which we live and work through employment is within our responsibilities. We believe that corporate sponsorships are key for the continuous build of the Evolution brand and for building strong relationships with the local communities. To assure efforts are supporting the brand values and only include partners that live up to the same standards in terms of quality and creditability as Evolution, all sponsorship initiatives should be evaluated by local Employee Branding teams and require approval from the Global Employee Branding team and CFO prior to final decision.

Evolution does not contribute directly, or indirectly, to political parties or individual politicians. Employees are not allowed to give political contributions on behalf of Evolution or use assets that belong to Evolution for the same purpose.

9. Environment

Evolution is committed to minimise its environmental impact and contribute to a more sustainable world. We actively work to improve the environmental performance of our operations for example by optimising energy consumption, using videoconferencing instead of travel where possible and recycling consumed materials used in our business. Evolution shall strive to meet the sustainability goals adopted from time to time in the Sustainability Policy.

10. Upholding the Code

The Code is adopted by the Board of Directors of Evolution. We may supplement or amend the Code from time to time. Any new or modified version of the Code is directly applicable and will be available on EVOSpace. We expect all our employees to adhere strictly to the Code and other governing policies relevant to their duties and apply them in everyday work. Managers have the responsibility to engage in ethical issues and translate the Code and other associated governing policies into local rules and procedures.

10.1 Report of violations

All employees and other stakeholders who suspect a potential breach of the Code shall report the matter to relevant local supervisors, managers or through the [Whistle-blower Procedure](#). Reporters may remain anonymous. All communications will be investigated as appropriate and kept as

confidential as possible. No employee acting in good faith will be subject to disciplinary measures for providing information regarding suspected violations of law or company policies.

10.2 Non-compliance with the Code

Failure to comply with the Code will be taken extremely seriously and may constitute gross misconduct. In the case of a breach by employees, disciplinary action is likely to be taken and a breach may also result in Evolution terminating a person's employment or engagement without notice, provided that nothing in the Code be deemed to modify or alter any employment agreement between Evolution and any Evolution employee.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach the Code.