



Code of Conduct for suppliers and business partners of the Danske Spil Group

1. Introduction

The Danske Spil Group (hereinafter referred to as "Danske Spil") makes a dedicated effort to be a responsible player in the betting and gambling market. We continuously strive to demonstrate the highest degree of corporate social responsibility (CSR) in our business activities.

Danske Spil considers the relationship with our suppliers and partners as essential to our commercial success. Danske Spil defines suppliers and partners (both referred to hereinafter as "Partners") as companies and individuals who provide a product or service to Danske Spil.

We only wish to work with Partners who share our intent to operate our business in a way that takes into consideration our social, environmental, and financial responsibility. This Code of Conduct aims to clarify what Danske Spil considers the minimum standard of social responsibility for Partners. The Partner's recognition and compliance with the standards of this Code of Conduct is a fundamental prerequisite for any cooperation with Danske Spil.

Depending on the type of cooperation, Danske Spil will be able to make specific demands in the tender/tender process for the Partner's handling of social responsibility, which is later included in the overall assessment of the Partner's offer as well as in the subsequent contract.

2. Scope and limitation

In addition to the provisions set out in this Code of Conduct, we expect the Partner to comply with all national laws and regulations as well as any other regulation applicable in the country in which the Partner carries on its business.

The provisions of this Code of Conduct apply to all the Partner's employees and all sub-suppliers who directly or indirectly provide a product or service to Danske Spil. The Partner shall ensure that employees and subcontractors adhere to this Code of Conduct. External consultants at Danske Spil must also comply with Danske Spil's staff manual, which is provided at the beginning of the cooperation.

3. Follow-up and terms

Danske Spil considers the relationship with the Partner as a collaboration and wants a constructive dialogue about compliance with the Code of Conduct. If there is any doubt about the interpretation of the provisions of the Code of Conduct, Danske Spil expects the Partner to contact Danske Spil for clarification.



Danske Spil reserves the right to follow up and evaluate the Partner's compliance with this Code of Conduct to assess whether the Partner carries on its business in accordance with the provisions. Follow-up may include requests for documentation or a visit to the Partner's premises.

If any discrepancies with this Code of Conduct are found, Danske Spil expects the Partner to remedy such discrepancies immediately and take the necessary measures to avoid any recurrence in the future. If the Partner finds that the Partner causes, contributes to or is associated with significant adverse impacts, the Partner must immediately notify Danske Spil thereof and state how the Partner intends to handle such impacts.

In the case of any discrepancies with this Code of Conduct, Danske Spil will initially strive to enter into dialogue with the Partner about the further course and discuss a plan for correction.

If, after repeated requests, the Partner still fails to carry on its business in accordance with the provisions of this Code of Conduct, Danske Spil reserves the right to terminate the cooperation with the Partner based on such discrepancies.

4. Responsible gambling

Danske Spil has a strong focus on promoting a responsible market for gambling, including, in particular, protecting vulnerable players as well as children, young people, and other vulnerable groups. Therefore, Danske Spil expects that Partners who provide products or services directly related to our gambling activities are especially aware of our desire to reduce negative impacts on players and that the products and services provided at all times as a minimum comply with applicable Danish law and industry requirements.

Danske Spil is a member of the international trade associations World Lottery Association (WLA)¹ and European Lotteries (EL)² and operate our business, as a minimum, based on these organisations' standards for responsible gambling. Also, Danske Spil is a member of the Danish Online Gambling Association (DOGA) and is a signatory to the Association's Code of Conduct for Responsible Gambling³. Danske Spil strives to select and cooperate with Partners who support or are certified within the standards for responsible gambling mentioned above.

Depending on the type of cooperation, Danske Spil may make specific requirements in the bidding or tender process for the handling of responsible gambling in the contract with the Partner.

5. People

5.1 Respect for human and labour rights

Danske Spil expects the Partner to respect human rights, both in relation to its employees and in relation to its partners, based on the guidelines described in the UN Guidelines on Human Rights and Business⁴. Danske

¹ <https://www.world-lotteries.org/services/responsible-gaming/framework>

² <https://www.european-lotteries.org/european-gaming-standards>

³ <http://doga.squarespace.com/blog/2019/3/15/spilbranchen-lander-aftale-om-adfrdskodeks>

⁴ https://www.ohchr.org/documents/publications/GuidingprinciplesBusinesshr_eN.pdf



Spil also expects the Partner to respect labour rights as described in the ILO Conventions⁵ and at least comply with applicable employment rules where the Partner operates.

5.2 Abuse and anti-discrimination

The Partner is committed to ensuring that employees are protected from abuse or harassment in the workplace and that any cases are handled while protecting the employees concerned. Employees must have access to a written complaint procedure that is transparent and easy to understand.

The Partner shall not discriminate in connection with recruitment, promotion or dismissal based on the age, sex, religion, sexuality, social or ethnic origin, nationality, disability, or political affiliation of the employees. The Partner must be able to provide evidence of how discrimination is avoided.

5.3 Health and a safe working environment

The Partner is committed to ensuring employees a safe workplace and to promoting a healthy physical and mental work environment. The Partner shall ensure that employees are consulted concerning the promotion of health and safety and that appropriate policies and procedures are in place.

5.4 Employment relationships

The Partner undertakes to comply with rules on the conclusion of employment contracts, compliance with minimum wages, the provision of undeclared work and child labour or compulsory labour. The Partner must respect the employees' freedom to organise unions, strike and enter into collective agreements.

6. Climate and environment

At Danske Spil, we are aware that our business has an impact on the environment, and we are continuously working on mapping, documenting, and reducing our climate and environmental footprint.

At the very least, Danske Spil requires the Partner to comply with applicable environmental rules and legislation that specifically address the products or services provided to Danske Spil by the Partner.

In addition, Danske Spil expects the Partner to exercise due diligence regarding its environmental impact. This includes identifying, preventing, and mitigating adverse environmental effects as well as documenting activities in the area. This may be concerning reducing energy consumption, waste management, and information for employees.

Depending on the type of cooperation, Danske Spil may impose more specific environmental requirements in the contract with the Partner.

7. Our business

Danske Spil operates to the highest standards when it comes to showing integrity, honesty, transparency, and professionalism in the way we conduct business. Danske Spil expects the Partner to maintain the same

⁵ <http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>



high standard in their cooperation with us and, at the very least, that the Partner complies with all applicable rules and laws in this area.

7.1 Anti-corruption and bribery

The Partner shall not in any way participate in, tolerate or benefit from corruption, including refraining from bribery, facilitation payments, and extortion or the use of any other methods intended to unlawfully influence business associates, public officials, judges or and private/other individuals.

7.2 Ethical conduct and conflicts of interest

Danske Spil expects the Partner to exercise good judgment and due diligence at all times when advising and providing products and services to Danske Spil. The Partner is also obliged to contribute to avoiding conflicts of interest arising from the cooperation with Danske Spil. If the Partner becomes aware of possible unethical conduct or personal, financial or professional relationships of the Partner's employees or in relation to the Partner's subcontractors or other partners that may constitute a conflict of interest with regard to the cooperation with Danske Spil, the Partner must immediately notify Danske Spil of this.

7.3 Gifts and hosting

Danske Spil will not accept gifts or entertainment from the Partner with the purpose of influencing the decisions of Danske Spil. This is generally also true in relation to receiving gifts from individuals, organisations, or companies if this can be perceived as an attempt to influence a business decision, Danske Spil's judgment or functions. On special occasions, employees of Danske Spil may receive and give gifts solely for business purposes and, as a rule, only worth less than DKK 700. Gifts may never be given or received during a bidding or tender process.

7.4 Money laundering

The Partner may not contribute in any way to money laundering and must at least comply with applicable anti-money laundering rules and legislation. Danske Spil does not provide and receive payment for products and services to anyone other than the Partner under contract and only to the Partner's bank account.

7.5 Confidential information and data processing

Danske Spil expects the Partner, like Danske Spil, to comply with all applicable rules and laws regarding the protection, storage, and deletion of personal data. Danske Spil works exclusively with Partners who take the utmost care in the handling of the confidential information that comes into their possession through their cooperation with Danske Spil and who maintain the necessary security measures regarding the handling of personal data.

8. Match-fixing

Danske Spil is active in the fight against match-fixing or rigging of sports matches. For those of Danske Spil's Partners who are engaged in sports betting or possess knowledge about this matter, Danske Spil expects the Partner to work with the same commitment to fighting match-fixing, for example through sharing information with sports federations, gambling companies or through participation in global initiatives such as the Global Lottery Monitoring System (GLMS)⁶.

⁶ <https://glms-sport.org/>