



Supplier Code of Conduct

Introduction

This Supplier Code of Conduct ("Code") outlines the ethical standards and legal obligations expected from all suppliers engaged in business with Lottoland, including those operating within the Gibraltar gambling and lottery industry, as well as in Malta and other relevant local jurisdictions. As part of our commitment to conducting business with integrity, we expect all our suppliers to adhere to the highest standards of business ethics and comply with all relevant laws, regulations, and industry standards.

For suppliers operating in the Gibraltar gambling and lottery industry, this includes compliance with the regulations set forth by the Gibraltar Regulatory Authority (GRA), and for those operating in Malta, adherence to the regulations of the Malta Gaming Authority (MGA). Suppliers must also ensure compliance with any other applicable local and international laws, including those concerning responsible gambling, consumer protection, data privacy, and anti-money laundering.

Lottoland is committed to promoting responsible business practices and fostering a culture of respect, fairness, and transparency in all its dealings. Our suppliers play a vital role in helping us achieve this commitment, and we require that they uphold the same high standards in their operations.

This Code is aligned with UK laws and international best practices, including those related to anti-bribery, modern slavery, anti-money laundering (AML), corporate social responsibility (CSR), and ethical procurement. It is designed to guide suppliers in maintaining responsible business conduct across all aspects of their operations while ensuring full compliance with the regulatory requirements of Gibraltar, Malta, and other local jurisdictions in which they operate.

Compliance with Laws and Regulations

Suppliers are required to comply with all applicable laws, regulations, and industry standards relevant to their operations, including those specific to the Gibraltar gambling and lottery industry. Suppliers should ensure that they remain fully compliant with the regulations set forth by the Gibraltar Regulatory Authority (GRA) or country-specific regulator and other relevant authorities, including those related to responsible gambling and the protection of consumers.

Anti-Bribery and Corruption

We have a zero-tolerance approach to bribery and corruption. Suppliers must ensure that they do not offer, give, or receive bribes, kickbacks, or any other form of improper

financial or other benefits in their business dealings. Suppliers should also ensure that their employees, agents, contractors, and subcontractors adhere to the same anti-bribery standards.

Suppliers must comply with the **UK Bribery Act 2010** and any other applicable anti-corruption laws. This includes prohibiting bribery in any form, including the offering or receiving of gifts, hospitality, or entertainment that could influence business decisions.

Modern Slavery and Human Trafficking

We are committed to eradicating modern slavery, human trafficking, and forced labour from all supply chains. Suppliers must comply with the **UK Modern Slavery Act 2015** and other applicable laws regarding the prevention of modern slavery and human trafficking.

Suppliers should ensure that they do not engage in, support, or condone any form of modern slavery, human trafficking, or forced labour. Suppliers must have appropriate policies and practices in place to prevent and detect such practices within their operations and supply chains.

Anti-Money Laundering (AML)

Suppliers must comply with all relevant anti-money laundering laws, including the **UK Proceeds of Crime Act 2002** and the **Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017**. Suppliers must take all necessary steps to prevent their services from being used to facilitate money laundering or the financing of terrorism.

This includes conducting appropriate customer due diligence, monitoring transactions for suspicious activity, and reporting any concerns about money laundering to the relevant authorities.

Corporate Social Responsibility (CSR)

Suppliers are expected to align with Lottoland's commitment to sustainability and responsible business practices. This includes adhering to socially responsible practices that promote the welfare of employees, communities, and the environment.

- **Environmental Responsibility:** Suppliers should take steps to minimize their environmental impact, reduce waste, and adopt sustainable practices where possible.
- **Community Engagement:** Suppliers should actively engage in and support community development, charitable activities, and initiatives that have a positive social impact.

Ethical Procurement and Fair Business Practices

Lottoland values fair and ethical procurement practices. Suppliers are expected to conduct their business with fairness, transparency, and in a manner that respects human rights and fosters good labour practices. This includes:

- **Fair Employment Practices:** Suppliers should provide fair wages, ensure safe working conditions, and respect workers' rights, including the right to unionize.
- **Non-Discrimination:** Suppliers should provide equal opportunities to all employees and avoid any form of discrimination based on race, gender, religion, nationality, disability, or other protected characteristics.
- **Respect for Human Rights:** Suppliers must respect internationally recognized human rights standards and avoid involvement in any activities that violate human rights, whether directly or indirectly.
- **Freedom of association:** Suppliers shall respect the rights of workers to associate or not to associate with any group, as permitted by, and in accordance with, all applicable local and national laws and freedom of association and collective bargaining. Suppliers shall not interfere with or discriminate against workers choosing to belong to them.
- **Grievance and disciplinary:** Suppliers must have in place a grievance and disciplinary mechanism for workers and their organisations. In the UK these mechanisms should follow the Acas Code of Practice on disciplinary and grievance procedures, outside of the UK any local equivalent requirements should be followed.

Health, Safety, and Wellbeing

Suppliers are expected to maintain a safe and healthy working environment, in compliance with all relevant health and safety regulations. This includes taking measures to prevent workplace accidents, injuries, and occupational illnesses, and ensuring that employees have access to necessary safety training and equipment.

Confidentiality and Data Protection

Suppliers must respect the confidentiality of any information shared by Lottoland and its customers, including personal data, intellectual property, and proprietary information. Suppliers must comply with applicable data protection laws, including the **UK Data Protection Act 2018** and the **General Data Protection Regulation (GDPR)**, ensuring that any data they process is secure and handled in accordance with legal requirements.

Monitoring and Auditing Compliance

Lottoland reserves the right to monitor, audit, and verify that suppliers are complying with the standards outlined in this Code. Suppliers are expected to cooperate with any such

efforts and to provide access to relevant records, documents, and personnel as necessary.

Failure to comply with this Code may result in corrective action, including the termination of the business relationship.

Conflicts of interest

Suppliers must avoid any situation where its interests (financial or otherwise) conflict with the contracted duties that it owes to Lottoland and/or its clients.

A conflict may arise if a Supplier employs or is partially or fully controlled by a Lottoland employee or his or her family member, or when a Supplier, its employees and its employees' family members receive improper benefits through the Supplier's relationship with Lottoland.

Lottoland Suppliers should not allow other interests to conflict with acting in the best interests of Lottoland.

Value for Money, Innovation, and Driving Best Practice

We are committed to creating value through responsible procurement, ensuring that we achieve not only cost efficiency but also the highest standards of quality, innovation, and service. We expect our suppliers to drive continuous improvement by offering competitive pricing, innovative solutions, and best-in-class practices that align with our values and objectives.

Suppliers should proactively seek ways to enhance efficiency, reduce costs, and introduce new technologies or processes that can improve performance and outcomes. We value suppliers who embrace innovation and work collaboratively to deliver sustainable, cutting-edge solutions that benefit both our organization and our customers.

Furthermore, suppliers are encouraged to share industry insights and help us drive best practice across our supply chain, with an emphasis on sustainability, ethical business conduct, and compliance with regulatory standards.

Reporting and Whistleblowing

Suppliers are encouraged to report any concerns or breaches of this Code, including violations related to bribery, modern slavery, money laundering, or other unethical practices. Reports can be made confidentially and without fear of retaliation.

Lottoland provides a whistleblowing hotline and email address to allow suppliers and their employees to report concerns directly to us.

Compliance with code

Suppliers must be able to demonstrate compliance with the Lottoland Supplier Code of Conduct. This includes documented evidence and the right of Lottoland or a designated firm to conduct audits.

Lottoland reserves the right to disqualify any supplier who is Non-compliant or fails to comply with the Supplier Code of Conduct during onboarding, whilst conducting business or post delivery of services.