

Environmental, Social, and Governance

ESG Policies and Guidelines July 2023

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Sustainability initiatives and directions

EveryMatrix aims to provide secure iGaming services, respecting the environment, the players and the community. Sustainability Strategy is one integral part of the business strategy and defines objectives and targets in main areas of interest: Environment, Employees, Safe Gambling, Business principles and Social Responsibility.

EveryMatrix uses a combination of governing documents and metrics and tries to maintain sustainability focused and relevant. Internal policies, such as the company's Employee Handbook, and policies supporting continuous learning and development are the framework of company's directions.

To ensure that the policies and principles are known to all team members and can be applied in their daily work, all new team members are introduced to these policies when joining the company and required to take training in key areas dependent on the scope of their role.

Dialogue with stakeholders

Our top priority for sustainability is the safety of our employees, clients, players and partners.

We believe that effective engagement with stakeholders is essential to our success and sustainability. This policy reflects our commitment to fostering transparent, respectful, and collaborative relationships with all individuals and entities who have a vested interest in our operations. We recognize that stakeholders encompass a diverse range of groups, including employees, customers, shareholders, local communities, regulatory bodies, and non-governmental organizations. Our aim is to actively listen, understand their perspectives, and incorporate their feedback regulation and requirements into our decision-making processes, ensuring that we take into account their concerns and interests. Through regular and meaningful dialogue, we strive to promote accountability, inclusivity, and mutual respect while continuously seeking opportunities for improvement. This policy serves as a guiding framework to uphold our values, strengthen trust, and jointly work towards achieving shared goals with our stakeholders, fostering a positive impact on both our organization and the wider communities we serve. We continue to seek partnerships and collaborate with experts. Ongoing dialogue with our stakeholders is vital to our success.

Why is sustainability important for us?

First and foremost, we believe that, in addition to driving social and environmental change, sustainability initiatives can contribute to an organization's overall success. If we have sustainability as focus, along with our aim of making profit, the company is probably ready to comply with new regulations as they are introduced with the goal of reducing social harm and to meet these changing demands.

From another point of view, there is a relationship between sustainability and customer retention. We want to make sure that our customers are not playing more than they're comfortable with and are proactively encouraging responsible gambling to contribute to sustainable player behavior. Our aim is to collaborate with the industry to minimize harm caused by gambling and innovate to put this in practice. EveryMatrix has a specified intent to make online gambling fun and fair and one key strand of that strategy is to create a safe, enjoyable and sustainable gaming service to our customers.

Our approach to player safety not only heightens player protection, it also promotes a more sustainable customer base, through increased use of responsible gambling tools and customer self-awareness.

We have introduced the role of Safer Gambling Coordinator who will help strengthen our partnerships in safer gambling and corporate social responsibility.

Our Employees

Growing steadily

EveryMatrix has 800+ employees, a located across ten locations globally and is ready to enter its next growth phase, being continuously expanding its operations across new geographies.

The Company's headquarters is located in Sliema in Malta with additional offices in Romania, Ukraine (two offices), China, Spain, Armenia, Norway, Thailand and the U.S. The majority of EveryMatrix's employees are based in Bucharest, Romania which is the main location for the Company's developers. The most recent office was opened in 2022 in Zagreb, Croatia focusing on development for EveryMatrix sportsbook.

Attractive career opportunities

EveryMatrix ensures attractive career opportunities in a context based on diversity and gender equality, as well as a work-life balance. Providing exciting jobs with secure employment terms is essential to a sustainable business, and a key to continued growth. As the company is in a continuous growing, recruitment and retention of employees is a key that determine the going forward process.

Besides the direct remuneration, the company attracts employees interested in its culture, working conditions and career opportunities. The flexible working conditions, the modern approach and the environment that sustain the work-life balance are the advantages the company promotes when searching talents.

EveryMatrix provides a platform that helps the company to attract, stimulate and retain talents with access to all employees where they can find information about open positions in the company. The average time employed in 2022 was 3.4 years.

Diversity as a core value

EveryMatrix considers itself as an equal opportunity employer that offers equal opportunities for employees irrespective of gender, ethnicity, religion or sexual orientation. The workforce is represented by 39 nationalities across its ten countries of operations and EveryMatrix aims at having an inclusive work environment that attracts the most talented individuals in the industry. EveryMatrix has established a diversity committee to raise and address any issues in the organisation, as well as continue working on creating an even better workplace. As of 31 December 2022, the Company had 689 employees across 11 different locations, of which 31% were women.

The company believes that the diversity means innovation and, an indicator of a good recruitment process where personal preferences, cultural background, gender don't stand in the way of professional judgment of the relevant qualifications.

Wellbeing and work-life balance

According to studies results, having work-life balance is the priority for employees today aside from salary. The ability of employees to deal with successful combining of work, family responsibilities and personal life is crucial for both employers and family members of employees. Work-life balance not only means an even distribution of time between work and private life, but rather flexibility in being able to work in the professional field, while maintaining the time and energy to spend on personal life.

EveryMatrix is proud to support a work-life balance, though multiple actions oriented to the wellbeing of the employee. Different types of leaves as parental leave, medical leave, bereavement or unpaid extended amount of time off are the fringe benefits accorded to employees in accordance with the laws and standards of each country, to deal with life events. Besides this, the company offers extra days for regaining strength, in accordance with the internal policy of leave. As the company is a real promotor of the diversity and inclusion, the employees can benefit of religious holidays, depending of their religious orientation, in addition to those granted by the Romanian law. EveryMatrix aspires to be not only a well-being promoter, but also a health supporter, with concrete actions, making available to all the employees a fully equipped and free office gym.

Training and personal development

EveryMatrix believes that training presents a prime opportunity to expand the knowledge base of all employees and provides both the company as a whole and the individual employees with benefits that make the cost and time a worthwhile investment. The offered training programs enable employees to build and strengthen necessary skills, based on their personal needs and goals. The company allocates money for individual development, in addition to the mandatory trainings.

The company encourages every employee to set a clear and personal road map for potential career paths in the company. To ensure this, individual reviews are done twice a year, providing a basis for a personal development plan for logical reasoning, performance and professionalism, team and project performance.

EveryMatrix has implemented starting 2023 career paths associated with seniority levels and job requirements for the majority of positions within the company. This enables employees and managers

to have a clearer overview of the hard skills, soft skills and experience necessary for internal promotions within a career structure and for making more objective promotions decisions.

Performance Evaluations follows a standard process and 2 cycles per year are being conducted at the beginning of the year and mid year. We are aiming to have a 360 degrees view on performance hence we include forms for self review, manager's review, 2nd level manager review and peer review. The performance assessment includes a 1to1 discussion between every employee and the direct manager including reviews on training and personal developments plans.

Detailed information regarding the training process is available in our Training and Development plan outlined by HR.

Responsible and Safe Gambling

Helping our customers

EveryMatrix acknowledges that the industry in which operates, for particular people in society, carries the potential of causing problems including issues posed by gambling dependency. The company does not have any direct contact with players, however, acknowledges the fact that it can contribute to ensure that gambling is carried out in a safe, open and fair way. Thus, EveryMatrix strives to make iGaming entertaining, transparent and fair, promotes healthy gambling behavior and tries to proactively identify and approach players who show signs of negative gaming behavior and/or are unsatisfied with their gaming habits. The Group is aware of the impact of iGaming on society and recognizes its responsibility to endorse responsible gambling, support research against gambling addiction and adhere to relevant compliance requirements.

As a B2B player in the iGaming industry, EveryMatrix adheres to compliance regulations across the different countries that the Group operates in. Bringing transparency and honesty to iGaming is a high priority in all operations and is pursued through compliance with iGaming supplier regulations. EveryMatrix takes great care in providing operators with all capabilities to run a responsible iGaming business. There are many technical solutions to support operators to deliver a responsible gaming experience including:

- Full player profile management- Comprehensive overview of data and activity, from contact details to balances, status, roles, transactions, bonuses, responsible gaming, login history, and more.
- Responsible gaming engine- Possibility to both operators and players to set financial and time limits fully configurable depending on market requirements.
- Legislation engine- Ensures compliance and high scalability across multiple jurisdictions with automated player details verification and self-exclusion available at platform or national level. Enables the technology to be effectively and swiftly adapted to meet specific regulatory requirements.
- KYC and fraud prevention- Protection against identity theft, account takeover and other abuses while decreasing operational costs through automation and real-time checks. The anti-fraud system automatically finds and suspends fraudulent activity. It is an iGaming tool preventing scams, bots, suspicious traffic and keeps platforms and affiliates safe.

Protecting children and other vulnerable people from gambling

The Company, as a B2B gaming company, has no direct contact with players, however it shall take the following measures to prohibit gambling by minors:

- Highlight on its website and marketing material that no person under the age of 18 is permitted to engage in gambling;
- Highlight on its website and marketing material a site dedicated to those seeking help in case of potential problem gambling issues;
- Highlight on its website the jurisdictions where it is licensed and regulated;
- Highlight on its website the jurisdictions where it is licensed and regulated;
- Ensure that no business is done with any individuals under the age of 18;
- Ensure that no employees of the Company are under the age of 18;
- Ensure that no marketing or advertising is conducted which can be appealing to minors.

It is thus of utmost importance for the Company to ensure that all its marketing and advertising is carried out in a socially responsible manner. In particular, the Company complies with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable and the Gambling Industry Code for Socially Responsible Advertising.

No products, services or advertising must be of particular appeal to children or young people. For this purpose, procedures are in place for the marketing team to properly evaluate what type of marketing is considered to be appealing to children or young people. Careful thought is also given to any graphics or branding to ensure that they do not have a particular resonance with youth culture.

Prevention and treatment of gambling problems

The Company is committed to giving back to the community and to contribute to research the prevention and treatment of gambling problems.

In an effort to overcome the problems posed by gambling, and in accordance with UK legislations, the Company makes an annual financial contribution to a charity organisation which is approved by the UK Gambling Commission, and which delivers or supports research into the prevention and treatment of gambling-related harms, harm prevention approaches and treatment of those harmed by gambling. EveryMatrix provides a range of tools that help players follow and limit their gaming time and deposit levels.

We aim to invest and strengthen our operational compliance team, which consists of dedicated responsible gambling specialists focused on detecting at-risk players. Also, we focus on ways to automate more responsible gaming interactions with players by offering support through various communication channels.

Employees awareness

EveryMatrix makes information readily available to its employees on how to gamble responsibly and how to access information about, and help in respect of, problem gambling.

EveryMatrix provides as a general procedure access to a self-administered test (the test should not be seen as professional advice and merely acts as a guide) for gambling addiction to make employees aware of any potential addictive behaviour they might have to gambling or are in the process of developing

through the following questions:

- a) Does gambling prevent you from attending work?
- b) Do you gamble to pass time or to escape boredom?
- c) Do you gamble alone for long period of time?
- d) Have others ever criticized you for your gambling?
- e) Have you lost interest in family, friends, or hobbies due to gambling?
- f) Have you ever lied to cover up the amount of money or time you spend gambling?
- g) Have you ever lied, stolen, or borrowed in order to maintain betting habits?
- h) Are you reluctant to spend “gambling money” on anything else?
- i) Do you gamble until you lose all your money?
- j) After losing, do you feel that you have to try and win back the losses as soon as possible?
- k) If you run out of money when gambling, do you feel lost and in despair and feel the need to gamble again as soon as possible?
- l) Do arguments, frustration or disappointments make you want gamble?
- m) Does gambling make you depressed or even suicidal?

EveryMatrix actively encourages all employees which reply “Yes” to any of these questions to speak to their local HR representative who can support, guide, and assist them as to where they can receive specialised help and support if needed.

Further, all EveryMatrix employees should be aware that the list below are some of the recommended organisations where information and anonymous live support can be found :

- www.gamblingtherapy.org/ (International)
- www.begambleaware.org Live chat is only available to users in England, Scotland and Wales. If you are outside of these areas, you can access online support via Gambling Therapy.)
- www.gamcare.org.uk / Live chat is only available to users in England, Scotland and Wales. If you are outside of these areas, you can access online support via Gambling Therapy)
- www.rgf.org.mt/ (Malta)

EveryMatrix encourages the use of software to block access to online gambling sites from computers (gamblock.com, betblocker.org.) as well to all employees which reply “Yes” to any of the above questions.

All employees are required to undertake Safer gambling general awareness training at the start of employment and then annually thereafter. Specialised training is given to relevant stakeholders including clients.

Social Responsibility

KidsAcademy A volunteer action

KidsAcademy was started in 2015 by a group of colleagues at EveryMatrix as an educational project targeting disadvantaged Romanian children. The mission is to offer the children the chance to access quality education that would otherwise be unavailable to them. The program primarily focuses on providing classes in Computer Science, Mathematics and English.

The Academy was first based in two of Bucharest's Child Protective Services day-care centres, but in 2019 the Academy expanded with an additional centre and in 2020 yet one more. In each of the four centres, EveryMatrix set up a modern computer lab, high-speed internet and provides teachers.

Since the beginning of the project, the team has helped 150 children in their academic journeys. Four full-time teachers and two volunteers are currently working on this project. Furthermore, EveryMatrix now guides a group of 10 teenagers who have shown great progress and interest in the courses. One of the teenagers was hired for a part-time job at EveryMatrix, and then by another institution. The group is taking advanced JavaScript classes and regularly participates in International Robotics contests, Mathematics contests and Olympiads.

Extending to an NGO

In 2018, the project evolved into a full-grown Non-Governmental Organisation that EveryMatrix and employee contributions sponsor. Nowadays, the activities continue independently in collaboration with the Bucharest Child Protective Services from Sectors 2 and 4, offering services to their Day-care Centres for underprivileged children.

The mission remains the same: to help unfortunate children by giving them the chance to access quality education that would otherwise be unavailable. Now, the NGO offers classes of: Computer Science, Mathematics and English.

Achievements

From the beginning, in 2015, until now we have achieved the following:

- 26.600 hours of teaching classes and activities
- 300+ pupils between age 7 and 16 had access to our quality education provided by our programs since 2015
- 5 educational centres operated in partnership with Bucharest's Child Protective Services
- 5 Computer Science labs
- 50 Computers
- 50 Tablets
- 15 teenagers take advanced JavaScript classes and regularly participate in international robotics contests (First Lego League), Mathematics Contests and Olympiads.
- 50 volunteers have been part of our events and activities.

Donations

- Every year we organize donation campaigns across our offices and support different causes:
- St. Julians: Sunday to Ring Road Races, donations for Hospice Malta charity organization
- Lviv: Christmas clothes, toys and goods donation for children
- Bucharest: Clothes donations for homeless people finding shelter in the Samusocial center
- St. Julians: Baking Fest, donations for Malta Autism Center (baked by EM)
- Bucharest: Cookie Fest, donations for KidsAcademy Christmas presents

Environment

Maximise the impact

Global climate change has already had observable effects on the environment. Effects that scientists had predicted in the past would result from global climate change are now occurring. Taken as a whole, the range of published evidence indicates that the net damage costs of climate change are likely to be significant and to increase over time. It is vital that individuals, businesses, organizations and governments work towards the common goal of reducing greenhouse gas emissions. EveryMatrix is committed to do its part and set targets to minimize the negative and maximize the positive impact through its operations.

Donations as solidarity actions

EveryMatrix has joined a large initiative to actively preserve the forests of the Romanian mountains. The company donated EUR 50,000 to Foundation Conservation Carpathia (FCC), which will use the donation to conserve, restore, and protect the wildlife of the region.

In 2005, Romania restituted many formerly nationalised forests to private owners, leading to massive deforestation. Since then, the country has lost thousands of hectares of Carpathian forests, which poses a severe threat to the integrity of the ecosystem.

Established in 2009 by a group of 12 philanthropists and conservationists, FCC's mission is to return the land ownership to the state in the form of a National Park. Through this effort, the foundation aims to acquire land, stop illegal logging, mass deforestation, and preserve the virgin lands for future generations.

Waste management

Our waste is segregated according to local recycling plans in our offices, canteens, and kitchens. EveryMatrix takes actions to raise awareness and involvement in minimizing single-use plastics, accurately sorting garbage, printing less to save paper, using reusable tableware in the office, and energy-saving tips and techniques.

Also, as a "green action", the company aims to reduce the emission of CO₂ through two directions: reduce the emissions from site electricity and reduce emissions from travel. Energy-intensive servers are the key when it comes to limiting the impact of infrastructure and daily operations. Our offices are contemporary, with sophisticated with energy-saving technology, auto light switch sensors, compact fluorescent lamps. Furthermore, EveryMatrix uses video conferencing to reduce the need for travel.

Future steps - a new eco office building

EveryMatrix follows an upgrade for the Bucharest workplace, having an ongoing contract for a new office building construction. The construction is based on state-of-the-art technology that aims to provide a result with an eco-green impact in the environment. The technical aspects are considering sustainable materials, the building being designed to achieve the LEED V4 Gold green certification. Moreover, the real estate company that manages the project consistently relies on a resource-efficient circular economy by using durable, repairable, and recyclable products during the entire construction process. Furthermore, new technology or building materials that are not harmful to the climate and the environment are considered. The developer's care in providing an environmentally friendly building can be observed in the quality of its architectural concept – the perfect mix of full and empty surfaces, offering a proper balance of natural light and energy efficiency.

Electric consumption and heat optimisation

The electrical system is designed to promote energy efficiency within the building. In addition, the lighting in all common areas consists of LED fixtures and motion detection sensors in the underground parking areas.

Furthermore, a list of specific elements has been considered to eliminate the impact of the building on the environment and human health, as follows:

- use of low consumption types of equipment;
- use of products and materials with low volatile organic compounds;
- AHU with heat recovery;
- free-cooling chillers;
- energy-efficient pumping system;
- openable windows to provide natural ventilation;
- BMS system designed to monitor all essential plant and equipment of the building;
- rainwater harvesting to be used for irrigation;
- selective waste collection;
- DCS Elevators;
- electric vehicles charging systems;
- bicycle parking lots and related amenities (showers, lockers, and changing rooms).

Eco benefits to employees

The building design was developed under the motto “build for people”. Therefore, the outdoor areas and the green surfaces are the two main elements that have been attentively considered besides the common facilities. Consequently, the building offers green terraces on each floor, a lovely exterior backyard garden, and greenery within common areas.

Sustainability actions

EveryMatrix has established a sustainability committee with the mission to support company initiative towards a green and sustainable environment.

Achievements:

- In 2023 we have concluded successfully 3 internal academies with the purpose of building a website for “Network for urban nature” project in Bucharest Romania with the aim of promoting nature preservation in Vacaresti Park.
- The company is awarding one day off to employees for organizing sustainability actions across the Globe. In 2022 we had different actions in our Croatia, US, Norway, Bucharest, Ukraine, Malta offices.

This policy will be periodically reviewed and updated to include specific objectives, measures, and actions. These enhancements ensure our ongoing alignment with industry standards and our steadfast commitment to promoting safer gambling.