

# Code of conduct

## Introduction from the President & CEO of MTG, Maria Redin

MTG (Modern Times Group MTG AB) is an international, mobile-first, gaming group. This means recognizing what our customers, and stakeholders care about the most within this context, and making sure that our products, as much as our internal and external business practices, live up to our vision.

We work in an innovative and fast-moving industry, and we are strongly committed to conducting business in a responsible way.

This Code of Conduct (the “Code”) sets out what we expect from each other and is the governing document of the entire policy framework. Please take the time to read it, understand it, follow it, and speak up when you have any concerns. If you want to know more about certain topics or areas, you can find out more in the individual policies. This is who we are and what we stand for.

Thank you.

Maria Redin

## Scope and context

The Code applies to all MTG employees, including employees of entities in which MTG exercises decisive control (“the Group”). It also applies to temporary workers including contractors, freelancers and consultants. Additional policies and guidelines may apply to specific roles and responsibilities.

The Code clearly expresses our values and helps us navigate how we do (and do not do) business. We are committed to conducting our business in full compliance with all applicable laws and regulations – and to achieving high standards of corporate responsibility.

Responsibility is at the core of MTG’s business, and is tightly integrated with our strategy, values and culture. As a responsible global business, we are committed to international initiatives and standards such as the OECD Guidelines for Multinational Enterprises, the UN Global Compact, the Fundamental Conventions of the International Labor Organization, the UN Universal Declaration of Human Rights, and the UN Guiding Principles on Business and Human Rights.

In case of or suspected risk of breaches of the Code, please report to <https://whistleblowersoftware.com/secure/MTG>

## Committing to our people & our world

*Everyone in our Group expects and gets equal opportunities*

*We understand, respect and value each other's differences*

*We are committed to each other and to the environment that we share*

We embrace the principles of freedom of expression, the right to privacy, editorial independence, and universal service accessibility.

We promote plurality, diversity and inclusivity as well as rejecting discriminatory or objectionable behavior. We follow applicable laws on illegal and unsuitable content as well as age ratings and restrictions for our games.

**Diversity, equality, and non-discrimination:** We should all enjoy equal opportunities. When it comes to recruitment, promotion, and training, what counts is competence, experience and performance. We believe that successful teams are diverse teams. We understand, respect and value each other's differences. We do not tolerate discrimination, bullying, victimization or any kind of harassment.

**Fair working conditions:** We should provide a professional environment that is in line with universal human and labor rights standards, applicable laws, and agreements on working hours and wage. We are free to join associations or unions, and to bargain collectively or individually. We do not use child or forced labor in our business operations.

**Health & safety:** We supply and keep a safe working environment that promotes physical and psychosocial wellbeing. Our offices and facilities follow all applicable health and safety regulations. Everyone should enjoy their job and have a healthy work-life balance, so we discourage work in excess of the applicable statutory cap on hours.

**Protecting our environment:** Our planet is our home. We nurture and safeguard the environment by keeping track of our carbon footprint, mapping our energy consumption, and encouraging each other to recycle waste and reuse equipment where possible.

## Protecting our assets

*Every asset must be kept safe*

*When something is not public, we keep it private*

*We only use work assets for work*

Assets are what make our product offering possible:

- our software, computer systems, equipment (including desktops, laptops, tablets, and phones);
- intellectual property, strategy plans, data, and
- group company names and logos.

Protecting our assets safeguards our business – this is a responsibility we all own. We are careful about how we use our assets, about how we manage confidential information, and about our responsibilities even after we leave the Group.

**Our IT assets:** We only use company email, corporate communication platforms, and internet connectivity and devices for legitimate and authorized business purposes. Limited private usage is fine too – if it does not hurt our work or contradict this Code or other relevant Group Policies. Using

personal software on a work computer, or modifying our software, is a security risk and requires the approval of the local IT department.

We do not access, display, download or share inappropriate content or information when using our IT environment unless part of an employee's duties or responsibilities. Inappropriate content refers to illegal, offensive, harassing, racially or sexually discriminatory, or otherwise inconsistent with a professional and ethical environment. We are careful when opening attachments or links in emails or on sites that are not related to our business, or from any source that we do not recognize.

**Confidential information:** As part of our work, we may have access to information about our operations that is not available to other people within and outside the organization. This could include financial data, business plans, contracts, and customer or supplier details. We protect confidential information from improper use and do not share it – even with colleagues – unless properly authorized to do so.

**If we leave the Group:** If we move on, it is time to return all company assets in our possession. After we leave, confidential information stays confidential.

## Doing business the right way

*We do not engage in acts of corruption*

*We compete fairly and act with honesty and integrity*

*Never compromise ethics when doing business*

**Anti-corruption:** Everyone working for – and act on behalf of – the Group is expressly prohibited from partake in any acts of corruption. Bribes, and other types of corruption, unacceptable gifts, facilitation payments or other similar benefits are not permitted. We do not receive nor give unwarranted benefits in the form of gifts, entertainment or hospitality. Moderation applies to all types of representation, both our own and when we are being invited. All employees are encouraged to report any suspected or observed acts of corruption in accordance with the procedures set out in MTG's Anti-Corruption Policy or in the section on Responsibilities.

Employees of the Group will not face punishment of any kind for refusing to pay a bribe or for reporting unethical behavior as described in the Code – we expect such honesty and integrity of each other and those who we work with.

**Conflicts of interest:** We avoid and eliminate conflicts of interest. Examples of conflicts of interest include keeping external directorships or significant shareholdings in suppliers, customers, or competitors; employing family members or friends; or using a supplier in which a relative or close friend has a significant role or financial interest.

We do not work – in any role – for another individual or entity in a way that could affect our ability to carry out our roles and responsibilities within the Group.

**Fair competition:** We compete vigorously but fairly. We are committed to free and open competition and abide by applicable competition laws wherever we do business. We expect the same high standards from each other. We never agree with a competitor to limit how we compete with one another. This means: no price fixing; no agreements to split markets or customers; and no bid-rigging arrangements with our competitors. Competition laws also prohibit the abuse of dominant market positions.

**Doing business internationally:** Most countries have adopted laws regulating international business activities. Some of these laws prohibit business dealings with specific countries, companies, or

individuals. The rules may restrict transfer of assets, monetary payment, or provision of services to these countries or parties. We make sure that we know our business partners – including who owns or controls them, what business they do and where, and their reputation. Existing and new business partners are screened and checked against available sanctions lists.

**Representing the Group:** Wherever we are in the world, we always behave as ambassadors for the Group, and we respect local cultures at all times. Please refer to MTG's anti-corruption policy for further guidance on acceptable and prohibited gifts and hospitality.

**Interacting with partners and suppliers:** We respect human and labor rights as well as the interests of the Group employees and third parties – and we only collaborate with partners and suppliers that do the same. We ensure that current and prospective partners and suppliers are aware of – and act in accordance with – our Supplier Code of Conduct.

## Handling information the right way

*We work responsibly and in compliance with applicable laws when handling personal data*

*We keep inside information in-house*

*We let our communications teams take the lead on communication*

We respect the right to privacy. We keep reliable records and ensure accurate communication. And insider trading is always out.

**Data protection:** Everybody has the fundamental right to privacy, and we always respect this right. We protect all personal data entrusted to us, and we follow all data protection laws and regulations wherever we work. We hold and process personal data about our employees and customers for administrative and commercial purposes. The definition of personal data is very wide and can include name, address, phone number, date of birth, social security number, bank account information, IP address and device ID. We only collect, access, or process personal data that we need to conduct our business, and only for the purpose for which it is intended. We also ensure the data is always kept secure.

**Business information and communication:** As a publicly listed company, we have an obligation to supply business information to our stakeholders on a regular basis. All our public communication and disclosure is full, fair, prompt, and accurate. Our records form the basis of MTG's public disclosure and are also used in our internal decision-making processes. To ensure that our financial statements accurately reflect MTG's asset base and transactions, we are responsible for ensuring that all information that we submit to company records is complete and accurate. If asked (online or offline, in or out of the office) about MTG's views or statements by any external party, we pass the request on to our local communications team or MTG's Communications team. These functions take responsibility for commenting publicly on MTG group matters including strategy, performance, news, and opinions.

**Insider trading:** If we have access to information about the Group (or about a customer, partner or supplier) that is not available outside the company, and this information would be likely to have a significant effect on MTG or another company's stock price if it was made public, then we do not share this information, or conduct any transactions based on this information, or suggest that anyone else conducts such transactions, or change any orders that have already been placed.

## Raising concerns

*We take all concerns seriously*

*We speak up without fear of negative repercussions*

We do business honestly and with integrity. If we have a concern, we speak up – and we expect each other to do the same.

**A culture of openness:** We promote a culture of openness, responsibility, and accountability. We want everyone to feel comfortable about raising concerns. We expect you to tell us at once if you believe a violation of our Code or applicable laws has taken place or will take place in the future. Doing so makes an essential contribution to the sustainability of our culture. We can raise any matter of concern without worrying about a negative reaction. Our concerns will be taken seriously and investigated appropriately. Managers are responsible for encouraging an open dialogue, and for supporting employees and personnel action on behalf of MTG or our companies by addressing all concerns in a fair and unbiased manner.

**How to raise concerns:** We encourage employees, temporary workers including contractors, freelancers, consultants and other stakeholders that work with MTG to raise concerns when there are indications of potential breaches of legal or ethical standards. All such concerns shall first be raised with the direct manager or, if the allegations are about that manager, with their manager or with the legal department or CEO. Should you not believe that the concern has been, or will be, dealt with appropriately you can report the incident anonymously to MTG's whistleblower channel: <https://whistleblowersoftware.com/secure/MTG>. Allegations received will be investigated by an impartial group and follow a balanced approach to keep the informants' anonymity and protect the reputation and good standing of our companies and managers. MTG prohibits any retaliation against whistleblowers and, therefore, encourages informants to disclose their full details when reporting an allegation.

## Responsibilities

We are each responsible for familiarizing ourselves with this Code, and for seeking guidance if we are unsure whether a particular course of action is the right one. Our Code is our compass in situations we face daily; you can always start by asking yourself these three questions, and never hesitate to seek guidance.

1. Does it follow our Code?
2. Am I comfortable with it?
3. How would it feel if it was shared with others?

When we want to raise concerns, or when we are unsure whether our conduct would be acceptable contact your manager, local HR, the whistleblower channel of your company, the local CEO, MTG's Legal ([legal@mtg.com](mailto:legal@mtg.com)), MTG Communications ([comms@mtg.com](mailto:comms@mtg.com)) or file a report to the MTG whistleblower channel: <https://whistleblowersoftware.com/secure/MTG>.

## Additional policies

In addition to this Code, MTG has adopted Group policies which supply further information in the areas covered by this Code. The Code and relevant policies are either available publicly at: <https://www.mtg.com/responsibility/#policies-and-guidelines/> or internally for restricted use:

- Anti-Corruption Policy (Public)
- Asset Protection Policy
- Competition Policy
- Whistleblower Policy (Public)
- Anti-discrimination and harassment Policy (Public)
- Sanctions Compliance Policy
- Insider Trading Policy
- Supplier Code of Conduct (Public)
- Data Protection Policy
- Modern Slavery Act Statement (Public)
- Related Party Transactions Policy

## Policy history and change information

Version	Revision Date	Change information
1	2019-05-20	Initial Policy
1.1	2020-12-09	Minor editorial changes
1.2.	2021-12-08	Minor editorial changes
2	2022-12-08	Updated and revised for clarification