GiG

Sustainability Report 2019

contents

2019 Highlights

Key Achievements

Sustainable and long-term profitable growth is at the core of all aspects of GiG's corporate strategy. GiG focuses its sustainability strategy on areas most relevant to its business, at the heart of which is responsible gambling (RG). This means offering customers and end users a full suite of solutions across the iGaming value chain while upholding strict rules to minimise harm caused by gambling; to prevent gambling from being a source of crime, and to ensure it is conducted in a fair and safe way. GiG supports end users to comply with technical, legislative and responsible marketing demands.

Efficiency and Financial Sustainability

In 2019, the Company increased its business focus on efficiency and financial sustainability. A strategic review was initiated in November 2019 to reduce complexity in the business, focused on value creation and strengthening the balance sheet. The main conclusion was to focus strategic direction on B2B operations which led to the consequence to divest GiG's B2C vertical, i.e. its Gaming Operators, announced on 14 February 2010. This gave multiple upsides for GiG:

- Strengthening of financial position and decrease in overall risk.

- Reduced complexity enables full financial and operational focus on B2B, decreasing strategic risk due to conflicting B2C/B2B strategies.

- Increased earnings stability and quality, focusing on more stable revenues from B2B, i.e. Media Services and Platform Services revenues.

- Improved basis for company valuation, focusing on a less complex business model and increasing transparency.

ESG

GiG continued to integrate ESG topics into its long-term strategy with a view to make an overall positive contribution, achieve sustainable growth, and avoid and address adverse impact related to its operations, products or services.

Focus on Collaboration

We focused on strengthening our collaboration with higher education and charities to promote research, education and treatment:

- Teamed up with Bournemouth University to promote research and increase knowledge on harm minimisation and how to improve communication to increase effectiveness. GiG is involved in the EROGamb and GamInnovate applied projects.

- Collaborated with YGAM to pilot and evaluate accredited and certified responsible gambling training on their supplier chain for GiG employees, and secondly, to support YGAM's roll-out of educational programmes in Malta.

- Co-organised the first Responsible Gambling Week Malta in November 2019 together with industry peers and the Malta Gaming Authority in support to raise awareness on responsible gambling issues across the industry. The week covered a range of workshops, conferences and presentations and reached over 180 attendees from over 40 different companies based in Malta.

Artificial Intelligence

We have accelerated our work with artificial intelligence by creating AI-led tools to monitor player behaviour triggering interactions in real-time. This will further help us to increase safer gambling measures and player sustainability and to make the best and most sustainable business decisions possible.

IT and Cybersecurity

GiG's information security strategy is build on an end-to-end approach, having a holistic controls framework that targets balanced mitigation of risk in all that we do. GiG's information security processes are regularly tested by independent auditors against the highest international standards. In 2019, the GiG Core platform's ISO 27001:2013 certification was renewed.

Technology and Product

We are constantly looking to elevate our products and technology to ensure that they are both competitive and sustainable. Product, design and technology work extremely closely, and at GiG we are proud of the way these teams work; innovating, forward-thinking and always challenging and pushing each other forward. One of our main objectives is to create customer--centric products, meaning really getting to understand our customers and building real solutions for real problems.

Training

GiG continued to invest in its employees' knowledge and skillsin order for them to understand their individual and organisational responsibility towards responsible gambling, to understand how to identify problem gambling, and to have the knowledge to be able to conduct brief interventions and signpost for further support. Tailor-made sustainability and responsible gambling training is provided for each department within the organisation.

Environment

GiG hosted 50% of its servers with Equinix Inc's green data centers which operate on 100% renewable energy.

Message from our CEO

Richard Brown

I'm pleased to present GiG's second sustainability report that lays down our priorities and actions to build a sustainable business. Today, digital transformation is reshaping virtually every industry across the globe. This is an area where innovation accelerates, and so does the demand to play online in our rapidly evolving digital world. Gambling is one of the most compelling forms of entertainment and the change from landbased to online gambling has increased accessibility and improved UX.

GiG is a technology company and it comes naturally to support sustainability through investing in research and innovative technology. We seek to strategically align our efforts with areas our business has control and influence over, and believe in creating shared value with our customers, partners, investors and employees. We are enhancing our focus on emerging topics for growth and leadership and building on the foundation that prioritises transparent reporting on material issues.

In doing so, we made use of tracking data and statistics to analyse, monitor and improve key indicators. We focused on strengthening our collaboration with higher education and charities to promote research, education and treatment. We have set ourselves four priority areas: 'Fair and safe iGaming', 'IT and Cybersecurity', 'Responsible Marketing' and 'Encourage Employees to Thrive'. In addition, we focused on green initiatives throughout all operations to be a conscious user of energy resources and reduce our carbon footprint where possible.

We believe gambling should be fair and fun for all and take responsibility towards our employees, customers and business partners very seriously. GiG continued to invest in its employees' knowledge and skills to understand their individual and organisational responsibility towards responsible gambling. GiG promotes a positive, dynamic and sustainable way of working which directly impacts upon everyone we deal with. We accept nothing less than an atmosphere where everyone can be the best version of themselves with equal access to opportunities.

In this report we make use of GRI Standards and ESG reporting guidelines. We believe this reporting process allows us to gain a comprehensive understanding of the risks and opportunities facing the business, which enables the Company to make better decisions that create social and economic benefits for all stakeholders.

Richard Brown
CEO

Company Profile

GiG is a technology company operating in the iGaming industry. It was founded in 2012 and traded on the Oslo Stock Exchange in 2015 and on Nasdaq Stockholm from 26 March 2019 (dual listing). The Company creates iGaming solutions based on innovative technology, providing a platform for and facilitating internet gambling, gaming and sports betting.

B2B Solutions

Technical platform providing a technical foundation to create a stable and secure iGaming solution, offering a variety of tools. All other solutions can be integrated and accessed through the platform, including third-party games and payment suppliers.

360-degree lead generation and digital marketing provider with global reach for the iGaming industry. Media makes use of betting and casino guide publishing, online media buy channels, proprietary ad-tech and digital agency work.
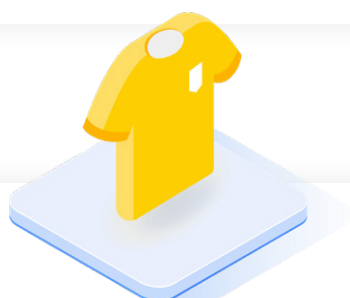
Fully hosted and managed sportsbook solution delivering a seamless omni-channel betting experience tailored for offline and/or online channels.

Managed services offering expertise and operational infrastructure to provide customers with everything they need to run an online casino or sportsbook.

B2C Casino Brands - Divested from 2020

In 2019 GiG's brand portfolio consisted of a B2C business with **consumer-facing casino brands** focused on regulated and soon-to-be regulated markets, offering gaming experiences in the form of casino games, sports betting and poker tables. The B2C vertical including the brands Rizk, Thrills, Guts and Kaboo was acquired by Betsson Group in February 2020.

Our Vision

Vision

Opening up iGaming to make it fair and fun for all

Mission

Have a stake in every fair online bet

Our vision and commitment is to make iGaming fair and fun for all. The goal of the sustainability report is to explain how GiG runs a sustainable business, our key focus areas and how we conduct our business in a responsible way for all stakeholders. We are creating a culture of social responsibility to ensure compliance, promote responsible gambling, adopt best practice and improve the social impact on our industry.

In the new interactive report on our website, we detail how we engage our stakeholders — investors, customers, employees and others — to advance and evolve our Environment, Social and Governance (ESG) efforts. Please visit gig.com/sustainability to view our full corporate sustainability report.

GRI
Empowering
Sustainable
Decisions

The report has been prepared in accordance with the Global Reporting Initiative (GRI) Sustainability Reporting Standards released June 2018

Our Strategy

The iGaming Value Chain

Technical Platform, Content & Ancillary Services	Sportsbook
Platform Services B2B	**Sports Betting Services** B2B

| Marketing	**Divested** Operators
Media Services B2B	**In-house Gaming Operators** B2C

A Sustainable Business

Sustainable and long-term profitable growth is at the core of all aspects of our corporate strategy. We focus our sustainability strategy on areas most relevant to our business, at the heart of which is responsible gambling. This means offering customers and end users a full suite of solutions across the iGaming value chain, while upholding strict rules to minimise harm caused by gambling; to prevent gambling from being a source of crime, and to ensure it is conducted in a fair and safe way.

We value a close relationship with our customers, suppliers and end users which enables us to map out their wishes and needs and train our employees to work in a responsible manner. We support our customers to comply with technical, legislative and responsible marketing demands. GiG is a technology company and it comes naturally to support sustainability through investing in research and innovative technology.

Commitment

GiG is building a sustainable business to provide a fair and safe gambling environment for its customers and all end users, adding long-term value to all stakeholders. The Company has continuously invested in its legal, compliance and Player Safety Teams. We monitor customer accounts continuously and use data, reporting tools and transaction monitoring tools to identify playing patterns which may indicate a person having a risk of problem gambling. By adopting a duty of care, we do not solely look at our risks; our primary focus is on the player, whose wellbeing is central to our operations.
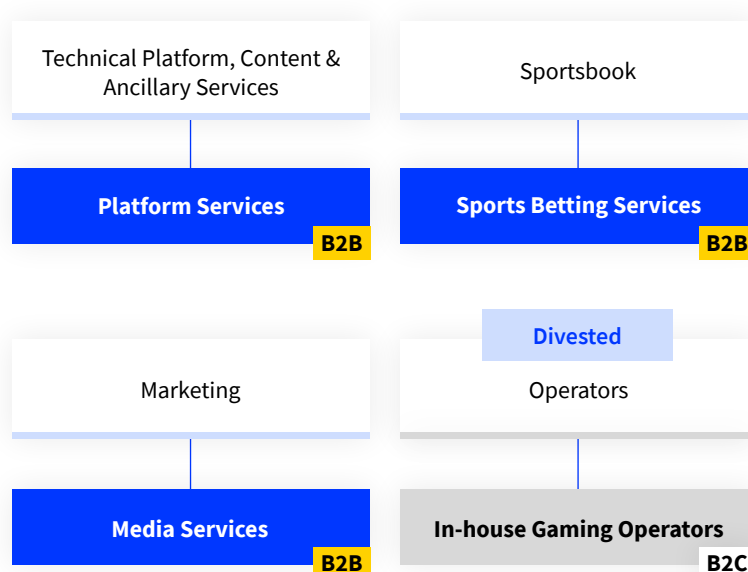
Collaboration

GiG collaborates with the industry to combine efforts and address issues in a more powerful way. We work closely with peers and other organisations to encourage a responsible attitude to gambling and to address gambling-related harm. In 2019, GiG started collaborations with amongst others, Bournemouth University, YGAM, and Responsible Gambling Week, in collaboration with industry peers. The aim is to promote collaboration and knowledge sharing, participate in research and best practices on how to protect end users.

Markets

The Company operates in multiple markets and, as a result, is subject to multiple legislations governing gambling. GiG aims to fully operate in regulated and near-regulated markets globally.

Statutory frameworks aim to achieve an appropriate balance between regulatory requirements intended to reduce harm and the desirability of giving end users the freedom to choose how to spend their leisure time on entertainment related to gambling. Our role as a B2B provider is to provide tools and advice to our customers and the end users so they are able to achieve this balance.

B2C Casino	B2B Technical Platform	Media
United Kingdom	United Kingdom	New Jersey (US) (vendor registration)
Sweden	New Jersey (US)	Romania
Malta	Malta	Pennsylvania (US)
Schleswig-Holstein (Germany)	Sweden	Indiana (US) (certificate for sports wagering)
Spain	Iowa (US)	
Croatia (pending)	Spain	

Sustainability Priority Areas

GiG has four priority areas in its social responsibility commitment:

- **Fair and Safe iGaming**
- **IT and Cybersecurity**
- **Responsible Marketing**
- **Encourage Employees to Thrive**

In addition, we focus on green initiatives throughout all operations to be a conscious user of energy resources and reduce our carbon footprint where possible.

All areas are explained further in the following chapters.
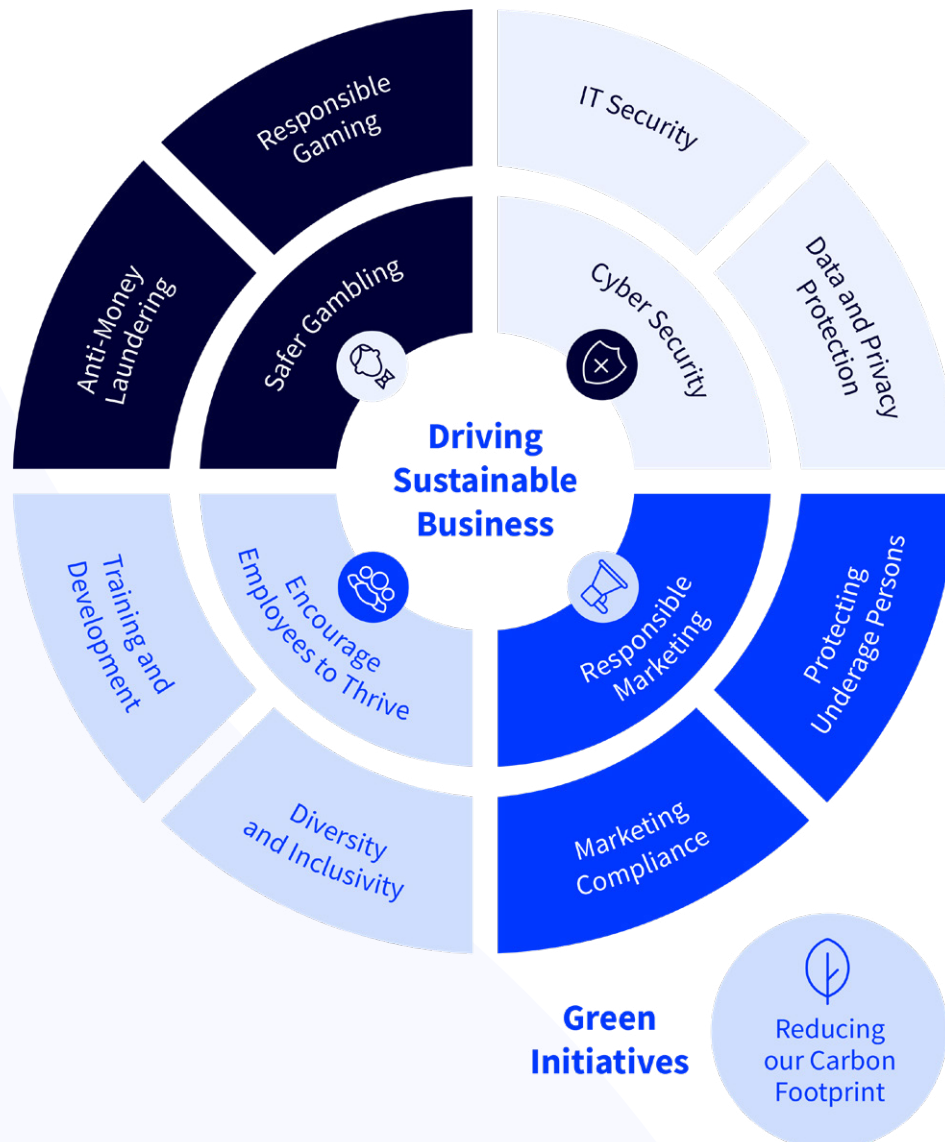
Alignment with the UN Sustainable Development Goals (SDGs)

Alignment with the SDGs

GiG strives to align sustainability objectives with the United Nations Sustainable Development Goals in order to accelerate its collective progress on the world's most important social and environmental challenges. We have prioritised our alignment with the nine SDGs (listed below) which are the most relevant and material to our business, indicated by where they sit on the priority wheel.

UN Sustainable Development Goals Icon Glossary

Good Health and Wellbeing

Gender Equality

Decent Work & Economic Growth

Industry, Innovation and Infrastructure

Reduced Inequalities

Responsible Consumption and Production

Climate Action

Peace, Action and Strong Institutions

Partnerships for the Goals

SUSTAINABLE DEVELOPMENT GOALS

Safer Gambling

Anti-Money Laundering

Responsible Gambling

Cyber Security

IT Security

Data & Privacy Protection

Encourage Employees to Strive

Training & Development

Diversity & Inclusivity

Responsible Marketing

Marketing & Compliance

Protecting Underage Persons

Green Initiatives

Reducing our Carbon Footprint

Our Stakeholders

Materiality Analysis

Stakeholder engagement and materiality are at the core of applying the ESG reporting guidelines and GRI Standards, which include issues spanning three themes: economic, social, and governance. We have identified material topics based on the importance of reflecting the organisation's Environmental, Social and Governance impacts or influencing the decisions of stakeholders. In this context, impact refers to the effect an organisation has on the economy and environment, and society. The impact can be positive or negative. GiG's sustainability reporting follows the ESG reporting guidelines and GRI Index, where materiality is the principle that determines which topics are relevant and sufficiently important to report on.

Influence on stakeholders' assessments and decisions

Data and Privacy Protection
Anti-Money Laundering
Training & Development
Diversity

Cybersecurity
Responsible Gambling
Responsible Marketing
Marketing Compliance

Emissions
Effluents & Waste
Local Communities
Energy Usage

Environmental
Social
Governance

Significance of GiG's environmental, social and governance impact

Stakeholders' Long-term View

GiG's Sustainability Materiality Assessment takes into account and assesses the decisions and long-term view on the following essential stakeholders: capital markets, governments, business, labour and civil society. The plotted topics included in the matrix below are considered significant for GiG to drive a sustainable business. Topics that have the greatest impact on GiG — located at the top right — reflect areas where the Company has unique capabilities to address such concerns. Moving forward, GiG will continue to revisit annual materiality assessment to further evaluate the areas and update them as appropriate.

What you Cannot Measure you Cannot Change

Responsible business practices attract sustainable finance. By ensuring a virtuous cycle in the flow of good services and capital, it can benefit other stakeholders and their natural environment. It is well established that both investors and companies benefit from meaningful disclosures on sustainability performance and impact. Sustainability data supports value creation and development in the business.

Financial Materiality

Financial materiality is an important perspective; it is a subset of the larger and equally important perspective of stakeholders beyond shareholders. Investors are augmenting ESG information — it becomes more critical to investors and trade — but we cannot solely rely on the test of financial materiality. There are issues that are more difficult to monetise, for example ethics, gender diversity and carbon footprint. Many are not financially material, yet they are absolutely critical. We keep in mind that what is not financially material today, can be tomorrow. GiG reports on a full range of issues impacting the Company and the world around it. And therefore, materiality requires the business to go beyond an internal focus on financial

impact of the Company itself and requires us to consider our social, environmental and economic impact on the wider world. For disclosing ESG information we make use of the GRI Standards.

GRI Standards are referenced in over 160 policies around the world, in more than 63 countries: 45% of these policies are capital markets regulations.

The Power of Tech

Our Platform at the Centre of our Operations

GiG's iGaming platform is an agnostic, multijurisdictional solution, offering multiple game providers, CRM tools and leading payment providers. It is a player profile management system, with integrated KYC tools for verifying players. This provides the technical foundation operators need to create a stable and secure platform. Any other GiG solutions can be accessed through the technical platform, including third party suppliers and features.

Technology and Product

We are constantly looking to elevate our products and technology to ensure that they are both competitive and sustainable. Product, design and technology work closely, and at GiG we are proud of the way these teams work; innovating, forward-thinking and always challenging and pushing each other forward. One of our main objectives is to create customer-centric products, meaning really getting to understand our customers and building real solutions for real problems.

GiG invests in its technology's scalability, performance and the efficiency at which we deliver solutions. Our new technical chassis enables us to achieve a true microservice architecture. We ensure that strong governance principles are in place for technology, testing, release management and product delivery, which allows us to deliver quickly, effectively and towards best practices.

By developing our products in a modular way, combined with a true microservice infrastructure, we create a strong position to push innovation within the industry very quickly. We can

innovate new ideas, get feedback and test, develop and release at a rapid pace, meaning our partners benefit and that we also have a competitive edge in the market.

Flexibility is the word that explains the benefits of our products and technical architecture, when it comes to platform solutions and also front end solution. For operators who do not want to invest in development resources, our front end solution is built on the latest web technologies, which flexibility for operators to control the look, feel and design. Operators who wish to invest some resources can build their own front end on top of our CMS with their own technology stacks.

GiG Data

GiG launched its new data platform in January 2020. It is GiG's next-generation, scalable data platform, which can be integrated with GiG's Platform Service or with third-party solutions. It features standard KPI libraries across all tools and incorporates artificial intelligence applications which work together to seamlessly enhance data systems.

The cutting-edge platform offers operators a fast and scalable self-service tool which enhances business intelligence and produces data and back office reports in real time. The data platform provides a secure and compliant data framework, which is responsive to the critical data needs of GiG's partners.

GiG Logic

GiG Logic powers the implementation of tracking, responsible gaming, fraud and gamification in a time frame measured in minutes and hours, not days and weeks. GiG Logic can 'chat' to the players via almost any method: OSM, SMS, email or any protocol that has open APIs.

Safer Gambling

Player safety is one of our core values. We understand that a sustainable business requires a long-term relationship with customers built on trust, fairness and keeping players safe by minimising potential gambling-related harms.

Find insights from the experts and partners we collaborate with in the following pages.

Bournemouth University

During the last year we have focused on strengthening our collaboration with higher education and charities to promote research, education and treatment.

GiG has teamed up with Bournemouth University in order to promote research and increase knowledge on harm minimisation and find out how we can improve our communications in order to increase their effectiveness. We are involved in the EROGamb and GamInnovate applied projects.

We are providing them with advice — some of our staff have been collaborating with Bournemouth University since 2016. We are looking to establish a long-term collaboration to further enhance applied research on gambling harm minimisation.

"GiG has made an invaluable contribution to research being conducted at Bournemouth University on how to make better use of technology to protect online players from developing problematic gambling behaviours. By providing sample data and information about the systems that generate responsible gambling messages to players they have enabled our research group to develop and refine prevention and intervention strategies in our GamInnovate and EROGamb projects, which also involves co-creation with individuals with a range of gambling experiences. As part of this work GiG has inputted into our discussions and plans around how transparency and data-driven approaches may be used to promote informed decision making and sustainable behaviour amongst players on online gambling sites.

"Further, GiG has facilitated our connections with other operators and stakeholders in this area, including through supporting the attendance of research groups at a Responsible Gambling Week event in Malta in November 2019. This has led to new contacts and opportunities for our research group, which will have a direct benefit to our research projects and future work."

Dr John McAlaney, Associate Professor in Psychology
Engineering and Social Informatics Research Group (ESOTICS)
Bournemouth University, UK

GamCare

"Following on from successful training delivery in 2018, GamCare were pleased to return to GiG to deliver workshops on Social Responsibility and Interaction, Communication and Motivating Behavioural Change. These sessions are the most advanced levels of training that GamCare delivers."

Andrew Bowring, Trainer
GamCare

YGAM

Collaborating with charities that focus on the prevention and educational aspects of gambling-related harm has been one of GiG's focus areas. Therefore we have partnered with the Young Gamers and Gamblers Education Trust (YGAM), a leading charity with a social purpose, to inform, educate, safeguard and build digital resilience amongst young and vulnerable people — helping them to make informed decisions and understand the consequences around gambling and gaming. We have team members working actively with YGAM to achieve these goals.

Firstly, YGAM pilots and evaluates accredited and certified responsible gambling training on their supplier chain for GiG staff, and secondly, GiG will support YGAM's roll-out of educational programmes in Malta, an initiative supported by the Malta Gaming Authority.

YGAM is a UK charity with a social purpose to inform, educate, safeguard and build digital resilience amongst young and vulnerable people, helping them to make informed decisions and understand the consequences around gambling and gaming. This is achieved through evidence-led, evaluated and accredited education programmes and resources for anyone who works with, or cares for, young and vulnerable people, including teachers, youth workers, community volunteers and mental health specialists. YGAM also works closely with universities and students to raise awareness of problematic gambling and gaming across campus, to build digital resilience amongst the student population. Finally, the charity also operates a trading subsidiary, YGAM Innovation, which provides accredited and certified training to colleagues working in the gambling industry in customer-facing roles, focusing on social responsibility and responsible gambling. All profits generated via trading are donated to YGAM.

"In a unique collaboration with GIG, YGAM will undertake two specific activities: firstly work with GIG and our supplier chain to pilot and evaluate their accredited and certified training to our colleagues, and secondly, we will provide employee volunteering opportunities to support YGAM's roll-out of education programmes in Maltese schools which is supported by the Malta Gaming Authority."

Lee Willows, CEO
YGAM

Responsible Gambling Week Malta

GiG organised the first Responsible Gambling Week Malta in November 2019, together with industry peers and the Malta Gaming Authority in support, to raise awareness on safer gambling and responsible gambling issues across the industry. The week covered a range of workshops, conferences and presentations and attracted over 180 attendees from 40 companies based in Malta, with a background in RG professions.

We believe that protecting players should not be a competitive advantage and that the industry should share best practices and knowledge to safeguard customers from gambling-related harm.

"The protection of players has always been considered by the MGA as a pillar of sustainable, fair, safe and licensable gambling operations. 2019 saw both European regulators and operators place an ever-increasing focus on player protection. The MGA was pleased to see its licensees increasingly take proactive measures to improve their responsible gambling and player protection efforts. This was exhibited throughout the organisation and execution of Responsible Gambling Week. Spearheaded by the industry itself, the events encouraged operators to share best practices, and to discuss ways in which to improve the manner in which they each protect players and consumers.

"It is clear that there are challenges that cannot be faced and overcome by the operators, or by the regulator alone, and it was in this spirit that the MGA chose to collaborate with the industry in this way. The MGA hosted the final session at its offices, and this took form of a round table discussion. It was very well attended, and the MGA used this event to highlight to all attendees the areas which require more attention from operators, the plans it has for the future of player protection and responsible gambling, and to listen to all concerns and realities faced by the industry in this regard. The MGA sat at the table with operators and discussed ways in which we, as the regulator, can further support the industry to provide a sustainable, fair and safe gambling service."

Yanica Sant, Head of EU Affairs and Policy & DPO
Malta Gaming Authority (MGA)

Safer Gambling

Providing a Safer Gambling environment is increasingly important in the iGaming industry as the highest standards in social responsibility are expected, and required, by our stakeholders.

In the last 12 months GiG focused on strengthening its teams, knowledge and tools to become leaders in player sustainability.

Early detection and interaction with players at potential risk has been one of our focuses as this is key for preventing harm.

Responsible Gambling

GiG's gambling operations are conducted in a sound and secure manner with a high level of consumer protection. Our aim is to uphold social responsibility, minimise the risk of end users becoming addicted to gambling and finding themselves in financial and/or psychological trouble, and ensuring gambling is not used in connection with, or in support of, criminal activity. GiG is committed to protecting underage and vulnerable people from being exposed to potential harm or exploitation from gambling.

We believe gambling should be fair and fun at all times and want end users to treat gambling as recreation and spend only what they can afford to risk. For some, it can be more difficult and therefore our operations adopt the best practices of responsible gambling and technical compliance. The responsible gambling pages feature information to help and protect end users, such as how to set deposit limits, loss limits and session limits, as well as information on how to self-exclude.

We have invested in a dedicated compliance operations team by introducing a proactive, customer-facing safety and responsible gambling team (branded Player Safety Team), which has the end user at the heart of its operations. This team monitors and assesses trading patterns daily, identifying and actively contacting customers who show patterns of problematic gambling behaviour, while also offering help and support.

The Technical Compliance Team has also introduced tools to monitor, detect and alert if they suspect fraudulent or criminal activity. Similar tools identify when spending per individual reaches certain thresholds, instigating an automatic system request to complete an extended KYC document or to provide supporting documentation to evidence source of funds.

Our Legal and Compliance Team is responsible for GiG's approach to responsible gambling and anti-money laundering. AML processes are subject to audits undertaken by external auditors. Also, RG processes are subject to an internal review process that executes sampling on a continuous basis.

Our Player Safety Team

We have a fully dedicated team of Player Safety (PS) advisors that is completely focused on detecting 'at-risk' players, interacting with end users and evaluating the outcome of these interactions with the help of our data team.

The PS team receives real time alerts, escalations and daily reports in order to proceed with an account review of consumers at potential risk and proceed with a safer gambling interaction, when needed. The Player Safety Team works closely with operational and compliance teams to provide timely support in order to minimise risk for end users.

We work endlessly to upgrade the knowledge and skills in our Player Safety Team in order to safeguard the end users. In addition to our Player Safety Team, senior Customer Service agents are trained as RG ambassadors, receiving additional training on how to interact with customers who may be at risk of gambling harm and empower these end users to make positive changes to ensure their gaming is more sustainable and part of a balanced lifestyle.

"We really care about our customers. My team and I work around the clock to ensure that we protect the players. We review all accounts flagged by our systems and escalations from the operational team and interact with players to promote positive change".

Markus Neubauer,
Player Safety Team Leader

Identification and Verification

It is illegal for anyone underage, meaning younger than the legal age of the jurisdiction of residence in a regulated environment, to open an account or to gamble and any such instance is treated with due care immediately. For example, in the UK, we carry out age verification checks upon registration. In Sweden this is done via personal number upon registration. If any person attempting to register an account is suspected of being underage, the account will be temporarily suspended pending further verification documents and checks. Should it become apparent that a person has registered an account whilst underage then the account remains permanently closed and any deposits (less withdrawals) are returned.

Risk Assessment Limits, Account Closure, Flag Reports

Upon reaching the EUR 2,000 threshold of deposits or withdrawals in the UK, the end user's details will be verified unless verification is conducted at the registration stage by using electronic ID or other equivalent technology. Upon registration, the geographic risks, the product risk, the customer risk and the payment medium utilised, will be factored to risk assess the profile and assign a risk rating. We risk assess end users in real time. Politically Exposed Persons (PEPs) will automatically be assigned with a high-risk marker following senior management approval.

Enhanced due diligence will be applied on high-risk end users. Setting of limits is the end user's primary tool for staying in control of their own gambling and spending. End users can set different limits through the website themselves, or they can contact customer support via the on-site chat function or email. End users can choose between different types of account closures: temporary timeout, temporary self-exclusion, permanent self-exclusion and permanent account closure. UK-based end users who wish to self-exclude nationally have the option to do so through www.gamstop.co.uk. The Swedish equivalent is www.spelpaus.se. Once registered, end users will be prevented from using gambling websites and apps run by licensed operators. Permanent self-exclusion is typically implemented for higher severity responsible gambling cases or on the end user's request. Once permanently self-excluded, accounts cannot be reopened under any circumstances.

Our Tools

GiG Protect

At GiG we understand the importance of identifying early signs of potential gambling-related harm. With this goal we have developed our AI machine learning system to help us identify end users who may be at risk.

The system uses predictors and algorithms to highlight customers at potential risk for further review from the Player Safety Team. We make sure that all accounts highlighted by our algorithmic model are reviewed by our Player Safety Team and that customers receive an interaction or preventive actions are taken when the account confirmed at potential risk.

We work with our data team to continuously enhance our models to improve our systems for the benefit of all.

Safer Gaming Tools

We provide a range of safer gambling tools to our end users to put limits to their gaming. These tools allow end users to decide in advance how much time or money they are able or willing to spend. If an end user decides to modify or remove these limits they go through a cooling-off period to allow them to reflect on their gaming.

End users are able to easily implement time-outs or self- exclusion if they feel that gambling is causing them harm.

Reports

In addition to our machine learning early detection model, our team receives a number of standard daily reports that can potentially highlight that a customer may be at risk, such as high losses, multiple withdrawal cancellations, multiple deposits within a short span of time, among others.

The accounts in these reports are reviewed by the Player Safety Team, resulting in interaction and account review when it is confirmed that end users may be at potential risk.

Real Time Alerts

The Player Safety Team receives regular real time alerts via an online live messaging tool through a bot when end users show potential risk triggers such as high deposits, the time spent playing or multiple onsite messages. This allows the Player Safety Team to review accounts in real time, interact with the end users and take safeguarding actions when required.

Safer Gambling Communication

We believe that well-informed end users are better end users for operators. By being able to pace their level of gaming, end users increase their level of sustainability.

We believe that gaming can be an entertainment activity for adults, but unfortunately for a small minority it can have negative consequences.

Our commitment is to continue providing information about our safer gambling tools to ensure that our end users can make informed choices.

"We have developed our **AI machine learning system** to help us identify end users who may be at risk"

Onsite Safer Gambling Messages

At GiG, we understand how important real time interactions are. For this reason we have developed our Onsite Message System, which provides a notification to our end users when a trigger is reached to help our them to make informed decisions in real time. In this respect they can enjoy gaming in a responsible and safer way.

We are continuously optimising these triggers and we are working with a research team at Bournemouth University, in the UK, in order to optimise the effectiveness of the messages that our end users receive.

When a customer is not responsive to written communication, emails or onsite messages we resort to contacting end users via phone.

We understand that providing a safer gambling environment is crucial for business sustainability — a strong level of awareness and training at different levels are key when it comes to reaching this. We are confident that we have a best-in-class training within the iGaming industry.

Training

All our employees complete regular training on safer gambling and our end user facing teams receive advanced training in these areas.

We provide a range of online, face-to-face training and safer gambling workshops throughout the year.

- GiG Academy: Our training department has, in cooperation with our safer gambling and compliance experts, created an interactive online training programme which covers all the regulatory requirements in terms of RG.

- Safer Gambling Workshops: We develop tailor-made, face-to-face training for different departments, highlighting key knowledge regarding safer gambling and sustainability in their area of work.

- Motivational Interviewing training: MI helps people resolve ambivalent feelings and insecurities to find the internal motivation they need to change their behaviour. This support style is particularly helpful with people at risk of gambling-related harm.

- Mental Health First Aid: We partner with the Richmond Foundation Malta which offers Mental Health First Aid training to our staff.

- safeTALK: Our consumer facing staff attend a half-day workshop which provides them with the practical knowledge they need to identify someone at risk of suicide and link them to life-saving services.

- GamCare: We outsource leading Safer Gambling training providers to complement our training so we not only provide best-in-class internal training, but also top-rated external training.

AML

Preventing Crime

GiG adopts a strict policy and does not accept any end users whose funds have emanated from ill-gotten means. This complies with all applicable obligations in relation to AML and Customer Due Diligence obligations. End users are identified through various automated processes at point of registration (depending on the country of registration) and GiG interacts with the players on a progressive basis with the intent to re-verify the player identity and establish transactional activity and seek to understand the player profile, thus tailoring appropriate controls on a risk-based approach.

All active players are screened on an ongoing basis against a Sanctions and PEP database. In case of PEPs, whilst we welcome their custom, we exercise Enhanced Due Diligence on an ongoing basis across the lifetime of the relationship.

All transactional and player betting activity is screened against a transaction monitoring database to ensure that we keep oversight of suspicious activity that may be diluted with the daily game flow conducted by legitimate players who gamble for fun.

Whilst we focus on protecting our operation from fraudulent transactions, our main driver is to prevent fraudsters and money launderers from channelling proceeds of crime through our gambling platforms. Furthermore, the gambling industry can also be abused by terrorist organisations who may attempt to move funds across, by disguising the financial movement as gambling winnings. On an ongoing basis, GiG monitors attempts of collusion, chip dumping and other staged gameplay where the perpetrator may be seeking to shift the ownership of funds to a third party rather than engaging in legitimate gameplay.

Where we suspect, or have reasonable grounds to suspect, that funds are the proceeds of criminal activity, we will disclose the information to the FIAU in Malta, the NCA in the UK or the FIPO in Sweden, as applicable. We have escalation channels set up for employees to report any unusual activity, which may give rise to any knowledge or suspicion of money laundering and/or the funding of terrorism, to the MLRO.

IT and Cybersecurity

At GiG, the confidentiality, availability and integrity of end users and employee information is of the utmost importance. We maintain a rigorous, risk-based information security programme aligned with our business strategy and objectives.

Data and Privacy Protection

Our internal controls framework is a direct result of continuous risk management processes, which take into consideration our business operations, as well as the external environment in which GiG operates. Protective, detective and reactive controls have been put into place to mitigate risk to our end users' information, as well as our customers' client base. Such controls have further been integrated within our internal processes and operations and ensure our employees' information is always processed in line with all regulations and is securely maintained at all times. In doing so, GiG ensures that all collected and processed data is safeguarded and protected, in accordance with all applicable laws, including GDPR, an EU regulation which harmonises data protection law amongst EU member states. All data is encrypted when being transferred. GiG offers mandatory training for all its employees via the online GiG Academy to understand the responsibilities and implications of our Information Security Policy and Access Control Policy.

ISO Certification

GiG's information security processes are regularly tested by independent auditors, to meet regulatory and compliance requirements and make sure controls are working as required to mitigate risk. In 2018, such information security processes were tested against the highest international standards set down by the International Organization for Standardization via an ISO 27001:2013 audit. In 2019, the certificate was renewed. The GiG Core platform was validated as meeting such standards by an independent audit firm, which is accredited by the United Kingdom Accreditation Service (UKAS).

ISO 27001 uses a top-down, risk-based approach to assessment and identifies the exact requirements and specifications for the most comprehensive Information Security Management System (ISMS). This certification highlights the Company's ongoing and systematic approach towards protecting confidentiality, integrity and availability of all information GiG controls and processes.

Information Security

At GiG, information security is a business priority with the aim to reduce risks to the business while enabling digital transformation. By taking a risk-based approach to the implementation of security goals, we make sure that the business is operating at an acceptable level of risk.
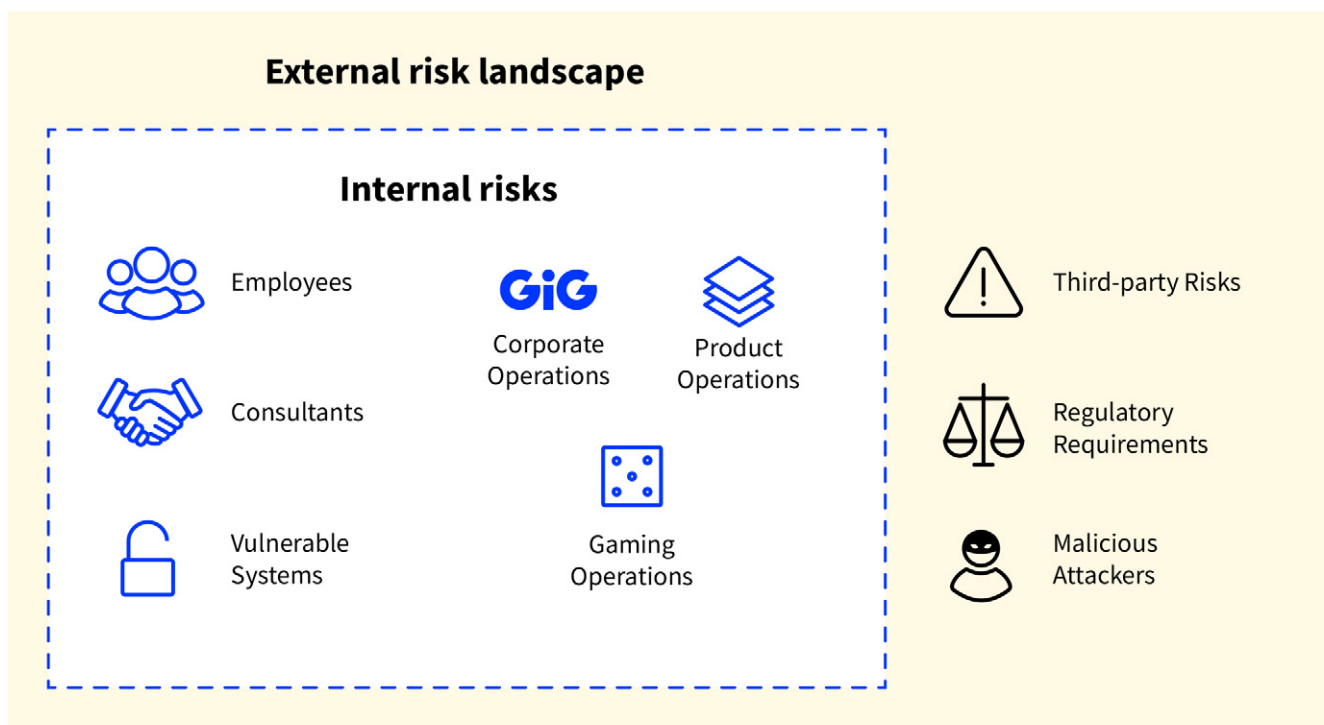
As the frequency of cyber attacks across various industries continues to grow, and the threat landscape becomes more complex, we aim to enable digital transformation through digital trust across our ecosystem. Maintaining the confidentiality, integrity and availability of information is a business priority at all times, and as such we are continuously working to ingrain a culture where information security is part of everything that we do at GiG. It is seen as everyone's responsibility, starting at the top, and integrated into all our business processes.

GiG aims to be a partner that our customers can trust, by ensuring that we are managing risk both internally and outside the Company borders. Security is a priority within our supply chain, where we aim to make sure that our suppliers and business partners share our vision of having security at the core of the business. This way, our customers' players can be assured that we are securing every transaction and treating their privacy as a priority.

GiG's information security strategy is built on industry-known frameworks such as ISO 27001, NIST and ITIL, and also reflects our business model. In 2019, GiG focused on the optimisation of six baseline security processes across all our operations, protecting our most critical processes and information. The six baseline processes aim to make sure that GiG has a holistic controls framework which includes mechanisms to protect, detect, react and monitor for any threats and attacks in the business.

The information security strategy at GiG involves a long-term plan that ensures risks are mitigated within our corporate operations and our product operations. We aim for an end-to-end approach to security, having a holistic controls framework that targets balanced mitigation of risk in all that we do.

Governance

- Policy Management
- Identity & Access Management
- Vulnerability Management
- Incident Management
- User Awareness & Education

External risk landscape

Internal risks

- Employees
- Consultants
- Vulnerable Systems

GiG
Corporate Operations

Product Operations

Gaming Operations

- Third-party Risks
- Regulatory Requirements
- Malicious Attackers

Through securing our corporate operations, we are making sure that information needed to run our business is being protected. Securing corporate information and systems also allows us to assure our employees that their privacy is respected and their information protected. We believe that our employees should be our first line of defence. This is why, in 2019, we have invested in a strong awareness programme that aims to equip our employees with the knowledge they need to perform their responsibilities, whilst always keeping security in mind.

We are making use of policies that are fit-for-purpose, reflecting our business operations, to govern security across all areas. In addition to this, we provide our employees with quarterly computer-based training, targeting different areas of concern with regards to security.

Building on the security integrated into our corporate processes we are ensuring, through continuous risk assessments, that our delivery of gaming services is secure. It is imperative that our player data is stored, processed and engaged with in a way that does not put players at risk. Controls range from protective, detective and reactive mechanisms within our internal processes and also within our providers' processes. In 2019, we have continued to enforce requirements on our providers, making sure that they are not putting our players' data at risk.

Our vulnerability management programme aims at having products that are secure by design and that are shipped in a secure state. Our security team, as well as independent third parties, are performing continuous testing on all our products and web applications to ensure that exploitable vulnerabilities are mitigated before going live. We also aim to reduce the introduction of any vulnerabilities in our product, by training our technology organisation on how to work securely. In 2019, we launched a secure coding awareness training programme, which is a yearly prerequisite for all developers within the organisation.

Responsible Marketing

GiG conducts marketing and advertising in a responsible and transparent way in accordance with regulation and requirements on promotional and marketing communications in every local market where we have a licence as stipulated by the UKGC, MGA, Spelinspektionen, Swedish Gambling Act, ASA and the Competition and Markets Authority (CMA).

We act in accordance with licence conditions and codes of practice linked to the fair and open licensing objective, stating that all marketing advertising of gambling products and services is undertaken in a socially responsible manner.

We comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP), as applicable, to ensure marketing communications for gambling are fair, do not mislead and are not targeted at vulnerable people.

GiG highly values transparency in its marketing advertising communication and informs the end user in clear and plain language of the full terms and conditions displayed prominently within the main body of an advert (or within one click from the advert in the case of genuinely limited space). Eligibility restrictions, deposit requirements, wagering requirements, restricted odds/games and withdrawal limits are examples of significant qualifications and limitations.

Marketing

We adhere to the rules applied to marketing communication (broadcast or non-broadcast) and we ensure, amongst others, that marketing communications must:

• Not mislead
• Present qualifications clearly
• Be socially responsible and not in any way mislead end users that gambling is a financial investment, that gambling is required for social acceptance or economic or social success, or that gambling may be the resolution to economic difficulties
• Not be false or untruthful, particularly with respect to the chances of winning or the expected return to a gambler

Advertising

We adhere to the rules applied to advertisements, i.e. every graphic material which portrays or promotes any information, and ensure, amongst others, that advertisements do not:

- Link gambling to seduction, sexual success or enhanced attractiveness
- Portray gambling in a context of toughness or link it to resilience or recklessness
- Suggest that gambling can enhance personal qualities, for example, that it can improve self-image or self-esteem, or is a way to gain control, superiority or recognition
- Exploit cultural beliefs or traditions about gambling or luck
- Suggest that gambling can provide an escape from personal, professional or educational problems such as loneliness or depression
- Suggest that gambling can be a solution to financial concerns, an alternative to employment or a way to achieve financial security
- Suggest that skill can influence the games that are purely games of chance

Protecting Underage Persons

Marketing and advertising communications are not aimed at, or should not appeal to, underage persons (i.e. any illegal age for gambling in any jurisdiction GiG operates) and should carry appropriate warnings about underage gambling.

For the purpose of brand advertisements and sponsorship agreements, no logos and names of gambling products or gambling services are to be found on products that are intended to be used or worn by underage persons.

Avoidance of Potentially Offensive Language

We refrain from using language, words and phrases in marketing and advertising communications which may be deemed offensive by both advertising audiences and regulatory bodies. These rules reflect the guidance issued by Ofcom, the UK's regulator for communication services.

Social Media Advertising and Marketing

Social media as a platform for advertising or any other form of commercially related content, including blogs, microblogs, vlogs, wikis, message boards, electronic newsletters, online forums, and all social networking sites, should follow certain advertising requirements, like for example:

- A responsible gambling message
- Links to sources of more detailed information
- An 18+ symbol (or a 'no under-18s' type message)
- Reference to www.begambleaware.org or a local support institution
- Profile pictures not showing cartoons or elements which are potentially appealing to children or young persons

Affiliate Compliance

We built a compliance tool called GiG Comply in response to operators' need to improve compliance oversight and responsible gambling. This monitoring service is designed to further strengthen marketers' control over third-party advertising and brand protection. GiG Comply drives responsible gambling by providing improved visibility of where and how brands are being advertised. The service helps protect them from being promoted on websites which are not brand-safe or compliant. It also protects from misleading advertising in their name and helps operators to adhere to complex advertising standards in the different regulated markets.

Encourage Employees to Thrive

In order to execute a sustainable Company strategy it is imperative that the organisation is equipped with the highest levels of talent at every level, armed with the tools to both develop and grow performance.

Our people approach is set to mirror the working strategy of the organisation and help us realise the strategic benefits of acting in the whole Company's interest, delivering the organisation's vision and mission, and ultimately driving a more sustainable organisation.

We have built a culture focused on diversity with a view to delivering both internal and community-led value. The values that underpin our organisation have allowed us to become a company that strives to open up iGaming and make it fair and fun for all.

Training and Development

Professional Growth

Our approach towards employees is empirical in nature. By making use of Competency Frameworks across our key verticals, we are able to not only employ, but also to develop people based on data. Competency frameworks give insights into the key strengths of teams which we use to develop tailored training programmes, allowing all employees to grow in a fair and innovative culture, driving a diverse and productive workforce.

Compliance and Sustainable Practices

GiG is committed to promoting fair and fun gaming principles and practices to its employees, customers and business partners, and we have focused our internal efforts to educate, discuss and innovate on core questions of sustainability.

From a training and development perspective, every employee undergoes a varied and extensive training plan that consists of compliance-related certifications, in-depth workshops and team-specific internal and external events which seek to nurture a deep understanding and appreciation of sustainability-related topics.

Our customers come first and foremost in this regard, with Customer Service agents, VIP and RG ambassadors and our specialised Player Safety Team receiving extensive training in Motivational Interviewing, Suicide Prevention and other advanced RG-specific practices.

We invite external experts to share their stories too: GamCare and safeTalk-certified trainers visited our premises to deliver multi-day workshops.
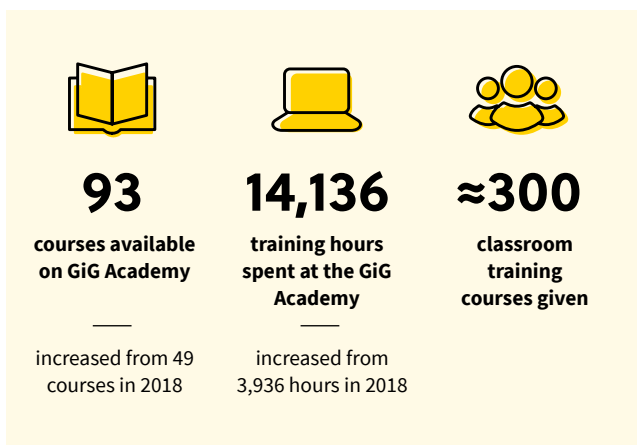
In total, GiG employees and White Label partners spent a combined 1,829+ hours on Responsible Gaming, Anti-Money Laundering and Marketing Compliance-related training courses within the GiG Academy and an additional 80+ hours in classrooms and knowledge-sharing events.

The variety of sustainability-related courses has increased from four courses in December 2018 to twelve courses and workshops in December 2019. Our dedicated Training and Development Team ensures that these courses are bringing out the best in our employees, spreading the ethos of sustainable business management throughout our organisation and our network of partners.

GiG Academy

The GiG Academy is an online training portal providing a wealth of interactive online courses and learning modules for all sectors of our business. GiG has a dedicated training team to update and launch new courses on GiG Academy, providing classroom training via webinar sessions. The GiG Academy is also available to external partners who would like to train their staff virtually. We believe education is key in spreading knowledge and expertise, and this in turn will raise the bar in our industry.
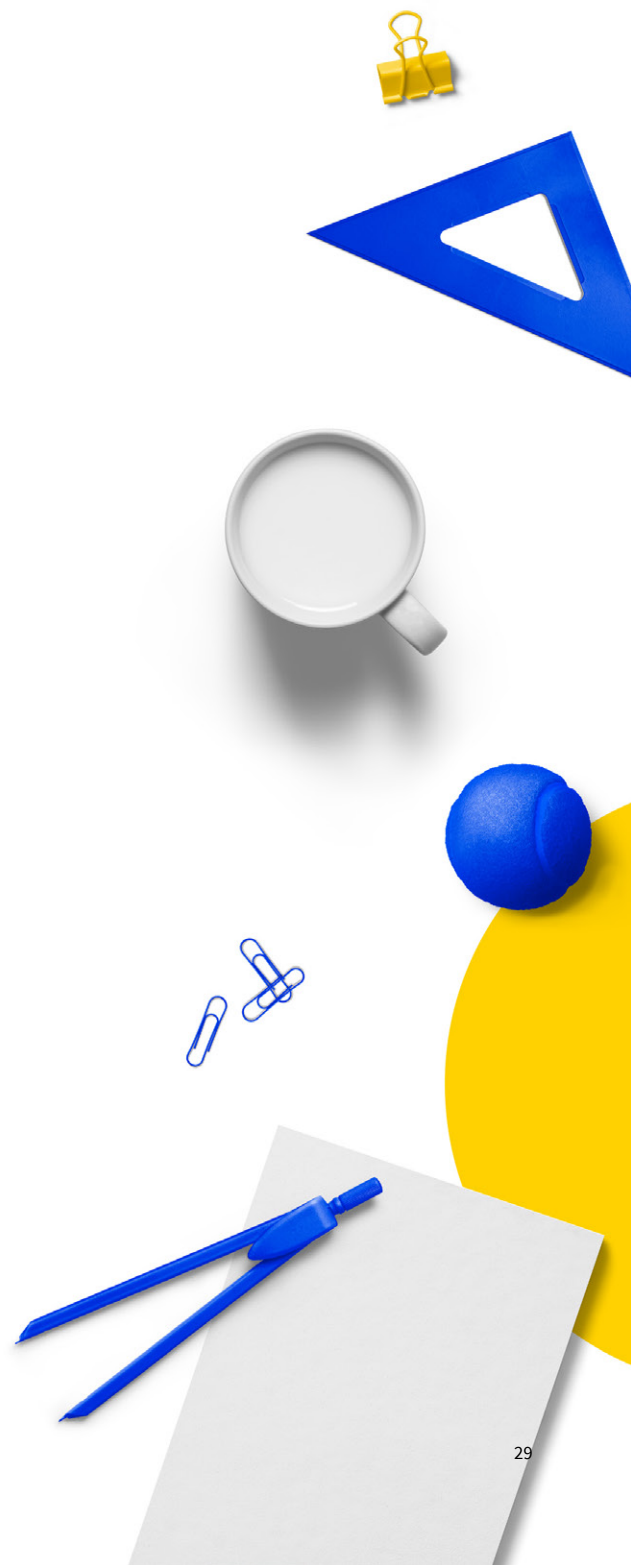
In 2019, Leadership and Soft Skills courses were created and launched which focused on driving the business and the individual forward, allowing key talent to thrive and take on new opportunities. We invested in external training, qualifications and events throughout the year, growing our already existing talent in key areas such as Product Management, Scrum and Agile methodology. Investing in our employees is a continuous core area in 2020 with new key competency frameworks to be introduced that have recently been established across the organisation, including performance management workshops and a new tool based on the OKR objective-setting framework.

93

courses available on GiG Academy

—

increased from 49 courses in 2018

14,136

training hours spent at the GiG Academy

—

increased from 3,936 hours in 2018

≈300

classroom training courses given

Auditorium and training spaces at each of GiG's offices for people to attend workshops or practice communication and presentation skills.

The GiG Academy has grown substantially, increasing the amount and spread of content available to employees. Our mandatory core training package includes expanded and updated courses for both AML and RG, as well as offering Marketing Compliance and Information Security courses. These online courses are followed up with monthly workshops and knowledge-sharing activities to cement employees' knowledge and build a company training culture around sustainability and player safety related topics.

Employees have given courses an average rating of four out of five stars on effectiveness, design and interactivity — a testament to our training team's dedication to learning that creates lasting experience by engaging the end user. Similar roles are extended to key individuals in the organisation, with a total of ten instructors contributing their own material and expertise. Going forward, we are focusing on further engaging the wider GiG community to share, contribute, actively participate in and discuss topics that are most important to employees and our business.

MadeYou

MadeYou have been training employees at GiG in a variety of courses to improve productivity and communication in an intense leadership development programme for 18 of their up-and-coming star players. These individuals were either recently promoted managers, or existing managers who were identified as potential successors to GiG's leadership.

"It was clear to us that GiG wanted to invest in their company's future in the best possible way; by investing in their staff. We're thrilled to see so many of our delegates getting the promotions they deserve. The best part is that the staff really take the lessons to heart; they've all reported feeling more engaged and more confident in their positions. As a trainer, that just makes our day!"

Luke Todd and Kelly McSherry, Co-Founders
MadeYou

Transparency and Alignment

At GiG, we believe in transparency at every stage of the employee's lifecycle. Our people's skills and competencies are regularly mapped and assessed in order to enhance performance management and internal career paths and/or professional development. The overall organisation embraced OKRs with the aim of working together towards the same goals and projects accomplishments. Each objective and initiative is mapped and recorded in an OKR tool, launched in 2019, which has transparency as its focus value, giving everyone in the organisation the opportunity to understand how each individual contributes towards the "big picture". At GiG, we believe in

each employee and we want our people to feel empowered and inspired by the Company strategy and values.

Sharing Best Practices

We believe that protecting customers should not be a competitive advantage: the industry can share knowledge, best practices and innovation to facilitate a more sustainable environment for us all. To this aim, GiG has led and actively participated in cross-industry knowledge-sharing events like the first Responsible Gaming Week Malta and Customer Appreciation Day.

Investing in People

GiG takes personal development seriously and supports all employees with a personal development budget. This allows every employee to grow their talents and improve their own skills, and boosts GiG's ability to continuously innovate within all of our products and services.

GiG's Leadership programme seeks to support existing managers and empower new staff wishing to move to a leadership position through self-reflection and shared learning experiences. Combining internal courses designed by the Training and Development Team with external courses, we are cultivating a culture of excellence and shaping leaders of tomorrow.

Our Commitment

Presently, we are bringing sustainability-related topics to the forefront and increasing the availability of in-depth resources which tackle questions around affordability, crime prevention, customer behaviour and more. By placing sustainability at the centre of our strategy, we can continue to innovate in both software and service, while focusing on our customers' wellbeing. This will be extended with targeted discussions internally and with our colleagues in the iGaming community.
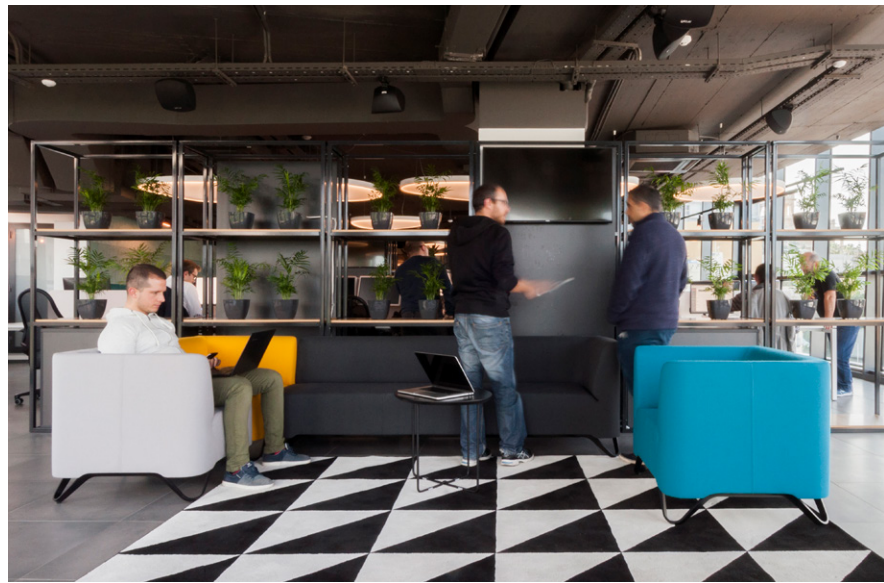
Purpose-led Hiring

Becoming a 'skilled organisation' with an ethical outlook is a challenge we accept gratefully. The 'War for Talent', from our perspective, is more about a 'War for Differentiation', creating a purpose for all current and future employees. Indeed, at each and every interview, we check candidates' 'buy-in' to responsible gambling and sustainability. We believe that hiring these individuals, who prioritise such elements, more than money or advancement, adds to our positive working culture and mission.

By offering this differentiation and by adopting a more proactive approach to our hiring, we positively contributed to a sustainable culture.

It is vital that our employees continue to be of undisputed integrity. To ensure this objective is achieved, all potential candidates must produce a CV; for some roles additional tests are involved.

GiG provides training to 'hiring managers' across the business to engage in an interview technique to eliminate 'bias' and to employ a fair and empirical approach to the process. Employing the STAR (Situation, Task, Action, and Result) method, all potential candidates are scored against four key criteria of the role, their approach to responsible gambling and their match to our key Leadership Principles. This process is underpinned by our Equality and Diversity Policy, ensuring that each and every candidate has an equal opportunity to work at GiG.

Some roles pose a higher risk to the Company operation and, consequently, additional due diligence may be undertaken to ensure the right candidates have been employed in risk-sensitive jobs. All new starters are subject to a standard due diligence procedure, which includes comprehensive reference and criminal record checks.

Integrity Policies

Insider and Trading Policy

The Insider and Trading Policy regulates how all employees and consultants are required to treat sensitive information and trading concerning communication, the GiG share and related financial instruments. This policy is approved by the Board of Directors and it is critical to ensure understanding of the handling of sensitive information and to prevent the risk of insider dealing and other prohibited actions.

Whistleblowing Policy

All employees must feel comfortable in reporting activities that may be unlawful, lead to incorrect financial reporting or

"Our process is underpinned by our **Equality and Diversity Policy**, giving each and every candidate an equal opportunity to work at GiG"

raise questions about the integrity of management, without any fear of retaliation. Therefore, employees, consultants and representatives are encouraged to report suspected or known violations of the Code of Conduct, any violation of law or company policy, or health and safety concerns through the reporting channels laid down in the Whistleblowing Policy. More information can be found on www.gig.com/ir under the Corporate Governance section.

Family-friendly Measures Across All of our Offices

We are proud to support growing families across all GiG offices. Our parental leave policies strive to make a difference and we are proud to be ambassadors of diversity and gender equality leave entitlements that have made, and will make, the difference to our employees' families.

GiG is committed to supporting parenthood and offers one of the most progressive leave entitlements of its kind in the industry in southern European countries. Fathers (biological and adoptive), husbands, civil partners and partners of either sex who live with the mother or adopter in an enduring family relationship are entitled to 30 days' paid paternity leave.

In order to offer better conditions and equal opportunities for our employees in Denmark, we have chosen to adhere to a private maternity fund instead of the mandatory government fund, mostly used in Denmark. This means that both men and women in the Company will get a larger part of their salaries whilst enjoying the time off. This way, not only can we ensure we provide a more generous maternity leave but also new mums and dads will have more time at their disposal to adapt and enjoy the new addition to the family. As a result, employees are less likely to have to make bigger changes in their lives and have the option to stay at home for a longer period than they might have chosen to do before.

All-in Diversity Project

"GiG joined the All-in Diversity Project as a Founding Member in 2017, quickly becoming one of the project's strongest advocates and supporters and establishing itself as an industry leader, influencer and role model for championing 'difference' as a springboard for innovation and sustainability.

"In 2019, the impact of GiG on the project has led to an increase in companies signing up for the All-Index, a greater willingness to talk about LGBT issues, a rise in female role models and greater awareness and acceptance of the business case for diversity and inclusion.

"The All-Index is a global workforce survey which benchmarks progress on diversity, equality and inclusion across the entire industry including land-based casinos, online operators, suppliers, educators, regulators and associations. The annual report paints a picture of how the industry fares when it comes to diversity and overall inclusion and support of its workforce. The index is the first of its kind and is a key element to progress on this issue. Since last year, Index participants have grown from 26 companies participating to over 50, thanks to the advocacy and sponsorship of GiG.

"Upcoming, the All-in Diversity Project will launch a number of initiatives exploring the role of diversity and inclusion in areas such as responsible gambling and player protection (alongside international partners such as the National Council on Problem Gambling), fraud and security, next-gen product development and player engagement and emerging technologies such as AI. Further still we hope to be working with regulators such as the Malta Gaming Authority to introduce aspects of diversity into the regulatory returns process, and the launch of the first-ever international code of practice for diversity and inclusion in the workplace in partnership with the British Standards Institution.

"We feel that GiG's unique product portfolio combined with its commercial goals and commitment to inclusion make them an invaluable contributor to all of these, but especially in relation to our Whitepaper on safer gambling and understanding how diversity data can be incorporated into regulatory metrics. We also hope to focus more this year on the LGBTQ+ community across Europe and the US and very much see GiG as our headline partner in this.

"GiG has played a significant role in leading the discussion around diversity and inclusion with their support of the project and public advocacy for the industry and we look forward to them taking a more international role with us in 2020."

Tina Thakor-Rankin and Kelly Kehn, Co-Founders
The All-in Diversity Project
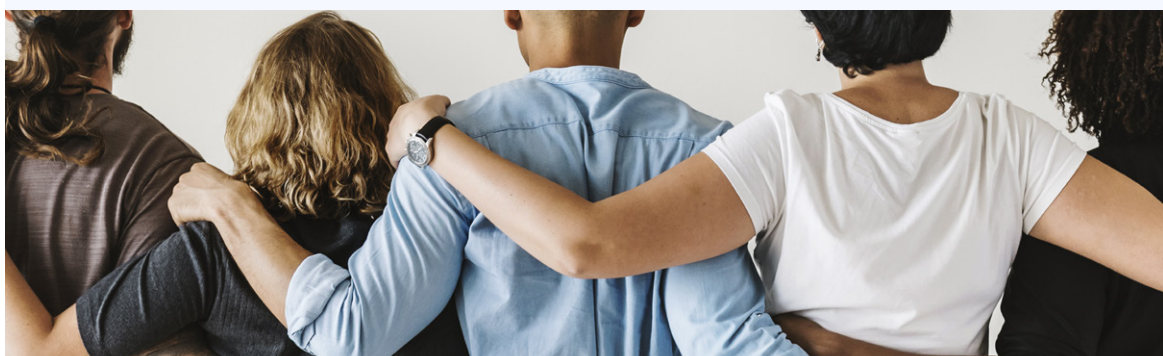
Diversity and Inclusivity

GiG is committed to being an equal opportunities employer and is opposed to all forms of unlawful and unfair discrimination. We accept nothing less than an atmosphere where everyone can be the best version of themselves with equal access to opportunities. GiG promotes a positive, dynamic and sustainable way of working which directly impacts upon everyone we deal with.

We stand for diversity and respect every person's uniqueness, regardless of gender, nationality, ethnicity, religion, age, sexual orientation, disability or personality.

We believe more diverse teams and an inclusive environment boosts engagement, innovation and performance, enriching our business and our culture. GiG welcomes, values and encourages employees who are seeking to reach their highest potential.

GiG Diversity

Female and Male Split

31% **69%**
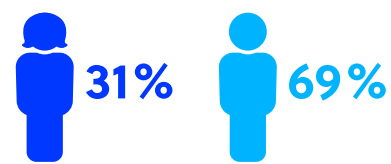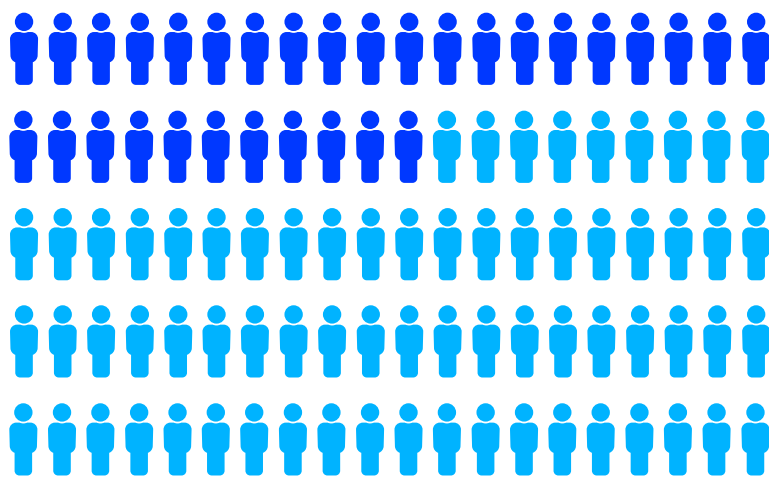
	Female	Male
Team Leads	26.2%	73.8%
Managers	35.1%	64.9%
Heads	23.8%	76.2%
Directors	25%	75%
C-Level	16.7%	83.3%

Age Breakdown

18-20	20-25	25-30	30-35	35-40	40-45	45-50	50-55
4.6%	7.4%	29.5%	29%	17%	8.5%	2.7%	1.3%

Office Locations
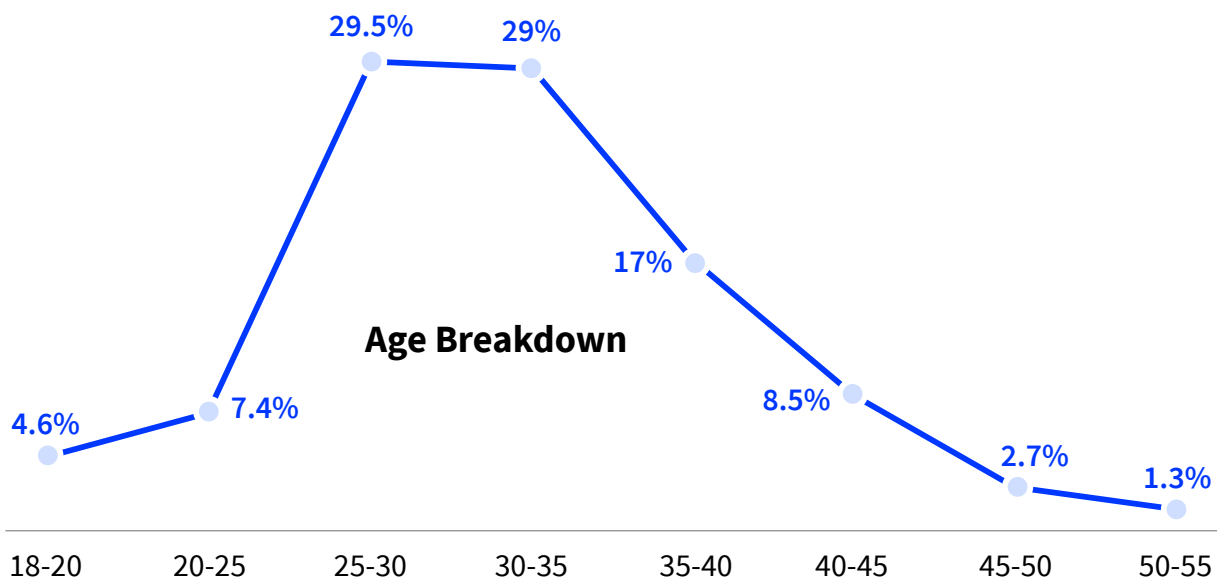
Norway
Denmark
Spain
Gibraltar
Malta
New Jersey (US)
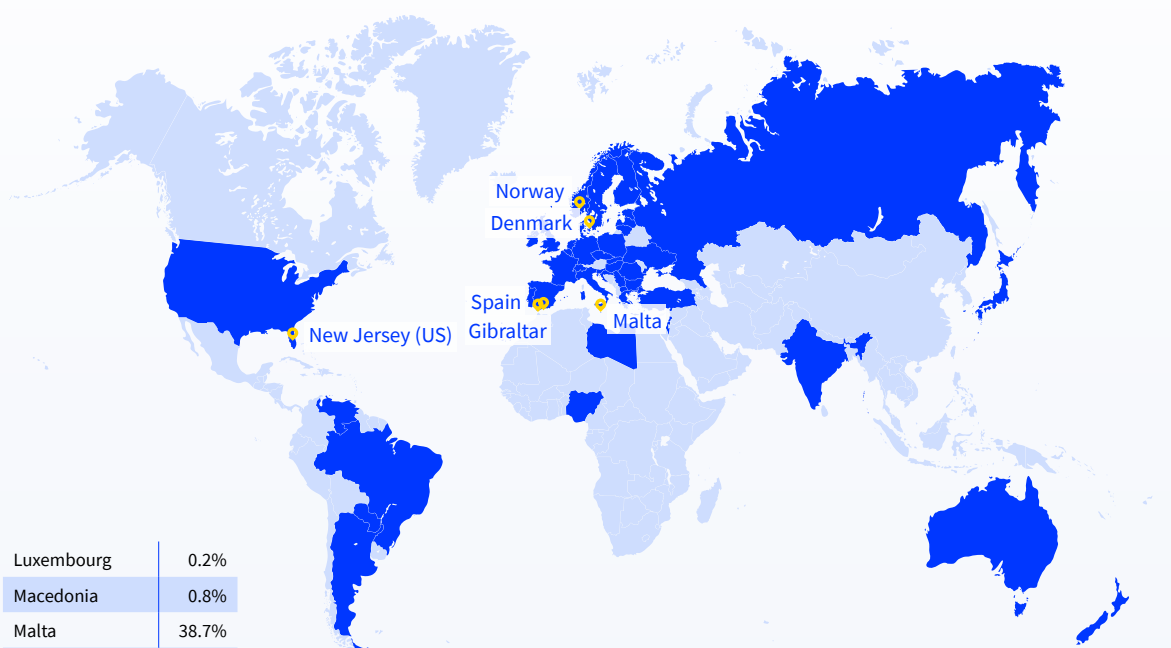
GiG Nationality Split

Country of Origin
of GiG employees

Country	%	Country	%
Argentina	0.2%	Luxembourg	0.2%
Australia	0.3%	Macedonia	0.8%
Belgium	0.5%	Malta	38.7%
Brazil	0.8%	Netherlands	1.1%
Bulgaria	0.5%	New Zealand	0.2%
Croatia	0.5%	Nigeria	0.2%
Czech Republic	0.2%	Norway	4.9%
Denmark	3.9%	Paraguay	0.2%
Estonia	1.0%	Poland	2.9%
Finland	4.4%	Portugal	0.5%
France	0.8%	Romania	1.5%
Germany	2.0%	Russia	0.5%
Hungary	1.3%	Serbia	0.5%
India	0.2%	Slovakia	0.3%
Ireland	0.3%	Slovenia	0.2%
Israel	0.3%	Spain	6.9%
Italy	3.9%	Sweden	6.7%
Japan	0.2%	Switzerland	0.2%
Latvia	0.7%	Turkey	0.2%
Lebanon	0.2%	Ukraine	0.2%
Libya	0.2%	United Kingdom	9.3%
Lithuania	0.2%	United States	0.5%
		Venezuela	0.3%

Total
employees **648**

Different
Nationalities **45**

Non-EU
Nationals **67**

Building a Culture of Diversity and Inclusion

Some of the ways we use to build a culture of diversity and inclusion include:

Employee engagement: Increasing awareness on the importance of diversity, inclusion and equal opportunities; preparing training for all employees to address unconscious bias, and supporting employee networking groups.

Processes and policies: Eliminating bias and integrating diversity and inclusion perspectives into processes such as recruitment and performance evaluation. Our goal is to provide an environment in which all employees are treated fairly, founded on our Equality and Diversity Policy.

Professional growth: We give every employee the opportunities for professional growth, and all employees can enjoy the innovative culture and productivity a diverse workforce provides.

Embracing Diverse Abilities in the Workplace

For example, in Malta, we have continued to work with the Lino Spiteri Foundation to engage individuals with disabilities into our workforce. In Spain, we work with the Aspandem Association, a Spanish charity, which assisted in the recruitment of two employees.

Supporting Local Communities

GiG's Corporate Social Responsibility strategy is set to have a significant and positive impact on the communities where we operate. The strategy is executed through a wide range of community involvement and employee engagement initiatives, which enriches and strengthens those communities in which we operate through a variety of programmes, sponsorships and donations. GiG's headquarters is located in Malta which is also where the largest number of employees per location is based.

GiG Gives Foundation

The employee volunteering programme GiG Gives aims to improve inclusion within the communities we operate in. We support charitable giving and community engagement in the areas of education, social services and cultural initiatives. This support is driven through charitable contributions to non-profit organisations and registered charities, as well as employee engagement programmes.

In 2019, every employee was given the opportunity to volunteer for eight hours, in the communities in which they live and work. We want to contribute to these communities in a way that demonstrates our intrinsic value to their development and progression. The name of the game is to donate our time, expertise, develop our people, build teams and all whilst improving our communities, eight hours at a time.

5,184 hrs

available to GiG employees for volunteering

Think About It
A value that guides our company culture

Green Data Centers

In 2019, GiG hosted 50% of its servers with Equinix Inc's green data centers which operate on 100% renewable energy.

Equinix Inc. greens the electrons through the use of renewable energy and low-carbon technologies like wind power.

Renewable Energy Statement

Equinix Inc. declares that the renewable attribute procured by Equinix and 100% of the Lessee's energy load receives a clean title to all claims associated with the renewable attributes, including any emissions offsets, reductions or claims, represented by the Renewable Energy Certificates (RECs).
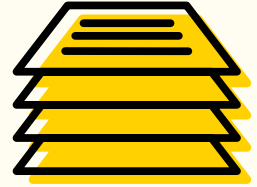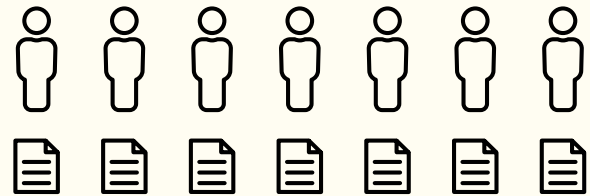
Environmental Footprint

In-office Recycling Programme

All waste in our offices, canteens and kitchens is **separated**.

Reselling IT Equipment

Outdated IT equipment is **resold and proceeds are donated to charities**.

Promoting Paperless Working

Printed paper usage: **one** sheet **per employee, per day**.

Smart Energy Consumption

Smart lighting systems and LED lights are installed in our offices, **saving 35% energy** compared to normal systems and light bulbs.
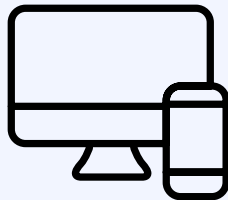
Reducing our Carbon Footprint

Two travel-free months in 2019 helped reduce our carbon footprint.

-80,000 kgCO$_2$ environmental impact

Thinking Reusable

Reusable containers, bamboo straws and edible cups are used to serve food, drinks and ice-cream.

Disposable packaging is **minimised** by ordering directly from suppliers. An **in-office water filtering system** reduces the use of plastic bottles.

Smart video conferencing set-ups in each office connect employees internationally, minimising the need for travel.

5,399 Less Commute Hours

by having an online, in-house academy

GRI Index

GiG's sustainability report has been prepared in accordance with the Global Reporting Initiative (GRI) Sustainability Reporting Standards released June 2018, with the Core application level.

GRI Standard	GRI	Indicator	Location of disclosures	Notes
General disclosures				
Organisation profile				
	102-1	Name of the organisation	SR p. 7, AR p. 10	
	102-2	Activities, brands, products and services	SR p. 7, AR p. 10-13, 18-24	
	102-3	Location of headquarters	SR p. 36, AR p.2	
	102-4	Location of operations	SR p. 36	
	102-5	Ownership and legal form	AR p. 54-58	
	102-6	Markets served	SR p. 9	
	102-7	Scale of the organisation	AR p. 42-52	
	102-8	Information on employees and other workers	SR p. 28-37	
	102-9	Supply chain	SR p. 7	
	102-10	Significant changes to the organisation and supply chain	AR p. 50	Changes in management
	102-11	Precautionary principle or approach	SR p. 9-12	
	102-12	External initiatives	SR p. 14-39	
	102-13	Membership of associations	SR p. 9	
Strategy				
	102-14	Statement from senior decision-maker	SR p. 6, AR p. 8-9	
	102-15	Key impacts, risks and opportunities	AR p. 35-36	
Ethics and integrity				
	102-16	Values, principles, standards and norms of behaviour	SR p. 8-12	
	102-17	Mechanisms for advice and concerns about ethics	SR p. 32	Whistleblowing policy
Governance				
	102-18	Governance structure	AR p. 53-60	
	102-19	Delegating authority	AR p. 53-60	
	102-20	Executive-level responsibility for economic, environmental and social topics	AR p. 53-60	
	102-22	Composition of the highest governance body and its committees	AR p. 53-60	
	102-23	Chair of the highest governance body	AR p. 53-60	
Reporting practice				
	102-45	Entities included in the consolidated financial statement	AR p. 61-97	
	102-46	Defining report content and topic boundaries	SR p. 10-12	
	102-47	List of material topics	SR p. 10-12	
	102-49	Changes in reporting	SR p. 12	
	102-50	Reporting period	SR p. 9-12	
	102-51	Date of most recent report	SR p. 6	
	102-52	Reporting cycle	SR p. 9-12	
	102-53	Contact point for questions regarding the report	SR p. 44	
	102-54	Claims of reporting in accordance with the GRI Standards	SR p. 8, 40	
	102-55	GRI content index	SR p. 40-42	

Material Topics

Economic impact				
Economic performance				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10-12	
GRI201: Economic Performance	201-1	Direct economic value generated and distributed	SR p. 12	
	201-2	Financial implications and other risks and opportunities	AR p. 35-36	
Anti-corruption				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10-12	
GRI205: Anti-corruption	205-1	Operations assessed for risks related to corruption	SR p. 22, AR p. 35-36	
	205-2	Communication and training about anti-corruption policies and procedures	SR p. 22, 28	
Environmental impact				
Energy				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10-12	
GRI302: Energy	302-4	Reduction in energy consumption	SR p. 40	
Emissions				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10	
GRI305: Emissions	305-5	Reduction of GHG emissions	SR p. 40	
Effluents and waste				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10-12	
GRI306: Effluents and Waste	306-2	Waste by type and disposal method	SR p. 40	
Social impact				
Employment				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10-12	
GRI401: Employment	401-2	Benefits provided to full-time employees	SR p. 28-36	
	401-3	Parental leave	SR p. 33	
Training and Education				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10-12	
GRI404: Training and education	404-1	Average hours of training per year per employee	SR p. 29	
	404-2	Programmes for upgrading employee skills and transition assistance programmes	SR p. 28-32	
	404-3	Percentage of employees receiving regular perfomance and career development reviews	SR p. 28-32	
Diversity and equal opportunity				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10-12	
GRI405: Diversity and Equal Opportunities	405-1	Diversity of governance bodies and employees	SR p. 35-36	
Local communities				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10 - 12	
GRI413: Local Communities	413-2	Operations with local community engagement, impact assessments and developments	SR p. 37	Community service hours contributed

Responsible gambling / Safer Gambling (Customer Health and Safety)				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10-12	
GRI416: Customer Health and Safety	416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	SR p. 14-22	Safer Gambling
Responsible marketing				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10-12	
GRI417: Marketing and Labelling	417-1	Requirements for product and service information and labelling	SR p. 26-27	
	417-3	Incidents of non-compliance concerning marketing communications	SR p. 26-27	
Customer privacy				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10-12	
GRI418: Customer Privacy	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	SR p. 23-25	
Socioeconomic compliance				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10-12	
GRI419: Socioeconomic Compliance	419-1	Non-compliance with laws and regulations in the social and economic area	SR p. 18-21, 26-27	Safer gambling, responsible marketing

Glossary

ASA	Advertising Standards Authority
AML	Anti-Money Laundering
API	Application Programming Interface
AR	Annual Report
B2B	Business-to-Business
B2C	Business-to-Consumer
CAP	Committee of Advertising Practice
CRM	Customer Relations Management
ESG	Environmental, Social and Governance
EU	European Union
FIAU	Financial Intelligence Analysis Unit
FIPO	Finanspolisen Rikskriminalpolisen
GDPR	General Data Protection Regulation
GiG	Gaming Innovation Group
GRI	Global Reporting Index
HQ	Headquarters
ISMS	Information Security Management System
ISO	International Organization for Standardization
ITIL	Information Technology Infrastructure Library
KYC	Know Your Customer
MGA	Malta Gaming Authority
MLRO	Money Laundering Reporting Officer
NCA	National Crime Agency
NIST	National Institute of Standards and Technology
OKR	Objectives and Key Results
OSM	On Site Message
PEP	Politically Exposed Person Renewable Energy Certificates
REC	Renewable Energy Certificate
SDG	Sustainable Development Goals
SMS	Short Message Service
STAR	Situation, Task, Action and Result
UK	United Kingdom
UKAS	United Kingdom Accreditation Services
UKGC	United Kingdom Gambling Commission
US	United States
UX	User Experience
YGAM	Young Gamers and Gamblers Eduction Trust

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Gaming Innovation Group Inc. ("GIG" or "the Company") is a US corporation incorporated in the State of Delaware, with its registered office in St. James City, Florida, USA with corporate number **2309086**. The headquarters are in Malta with operations in Denmark, Gibraltar, Norway and Spain.