

The page features several large, solid-colored geometric shapes: a large yellow rectangle on the left, a large blue rectangle on the right, and a yellow triangle pointing upwards from the bottom left towards the center. A small dark green triangle is positioned at the top right corner of the yellow triangle, overlapping the blue rectangle.

FAIR AND FUN iGAMING FOR ALL

Sustainability Report 2018

GAMING INNOVATION GROUP (GIG)

@GiG Beach, The Golden Mile,
Triq Id-Dragunara, St Julian's,
STJ 3148, Malta

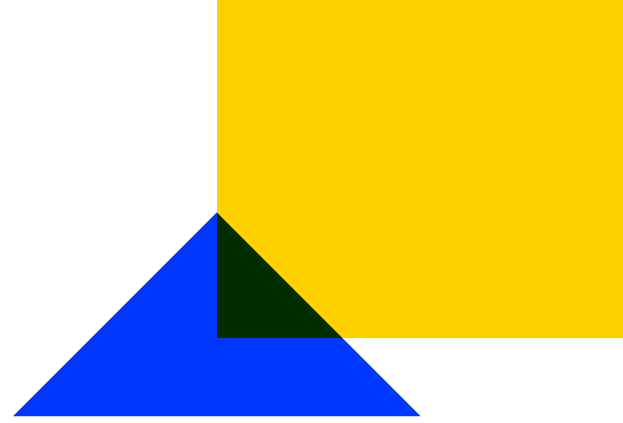
gig.com

VISION

Opening up iGaming to make it fair and fun for all

MISSION

Have a stake in every fair online bet



CONTENTS

4 Message from the CEO

5 Company Profile

6 Introduction

7 A Sustainable Business

13 Fair and Safe iGaming

17 Responsible Marketing and Advertising

19 Encourage Employees to Thrive

23 Corporate Social Responsibility

24 Environmental Footprint

25 GRI Index

28 Glossary

MESSAGE FROM CEO

Robin Reed

Gambling is a worldwide phenomenon and has been part of our society for centuries. The global gambling industry today totals a gross annual revenue of over USD 400 billion. Gambling is one of the most compelling and immersive forms of entertainment and the change from land-based to online gambling has increased accessibility and improved user experience. Gambling can also have a negative social impact, and the online industry has the responsibility to create a safe player environment that protects from potential negative consequences and minimises harm caused by gambling. We believe gambling should be fair and fun for all, and have set ourselves the compliance goal to improve the regulatory standing and social impact of the gambling industry.

At GiG we take this responsibility towards our customers very seriously and make use of data to monitor end users' player behaviour to detect signs of problem gambling. Online, we can track every touchpoint, every behavioural pattern, and by aggregating these data and setting algorithms, we analyse and understand the early signs which could indicate a customer is experiencing or developing problems. GiG's operational practices include a dedicated team of player safety advisors which continuously monitors patterns and acts upon alerts by interacting with those customers to ensure they receive support and advice.

We believe running a sustainable business is not only good for us and our customers; it is, in fact, best for our owners and all our stakeholders. We can only ensure long-term profitability by acting in a way that creates trust and loyal partnerships among all stakeholders; and we can only ensure our ability to take on long-term responsibilities by being profitable. For us, profitability and responsibility are not opposing forces; on the contrary, they are interdependent. We have a long-term perspective on our business, guided by our values. Sustainable success is a combination of the industry's attractiveness and the strength of our company's strategic position, determining our long-term performance.

GiG has invested significant energy and resources into developing its strategic intent and position. We have come a long way and realise our journey has just started and many things remain to be done. It is a continuous and evolving process. We are committed to being part of the solution we want to see and aim to work with the industry to combine efforts and address issues in a more powerful way. Our work is based on trust, respect and integrity. Our colleagues, customers, business partners and society share these expectations.

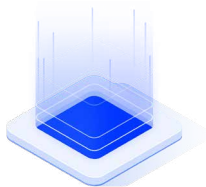


“We want to put end users, their enjoyment and their safety at the top of our agenda to build long-term, loyal partnerships.”

COMPANY PROFILE

GiG is a technology company operating in the iGaming industry. It was founded in 2012 and listed on the Oslo stock exchange in 2015. The Company creates iGaming solutions based on innovative technology, providing products and services throughout the entire iGaming value chain.

B2B Solutions



Cloud-based 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.



Game-developing studio offering direct integration onto the platform. Our in-house team of experts focuses on all aspects connected with game development and production, and is continually building games with improved user experience.



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.

“We are committed to developing products that are fair and fun for all.”

B2C Casino Brands



GiG’s portfolio also consists of a B2C business with **six 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: Rizk, Thrills, Guts, Kaboo, Betspin and Highroller.

INTRODUCTION

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.

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 collaborate with the industry to combine efforts in order to address issues in a more powerful way. Industry groups, non-governmental organisations, governments and community groups all play a valuable role in encouraging responsible gambling. We are working closely with peers and organisations to encourage a responsible attitude to gambling and to address gambling-related harm.

Both as an online operator and a software supplier providing online gambling platform and services, 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.

This report lays down our priorities and actions to build a sustainable business. We are committed to progressively working towards our sustainability goals and report on progress and development in annual sustainability reporting. In doing so, we make use of tracking data and statistics to analyse, monitor and improve key indicators.

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. Sharing information about policies and performance helps build trust with owners, customers and partners; monitors and mitigates risk; and finds ways to improve efficiency, resulting in a positive impact on all our stakeholders.

Background

The sustainability report is approved by the Board of Directors of GiG. The Board receives regular updates and topics are frequently part of the Management Team agenda. The Sustainability Committee within GiG reviews policies and projects to ensure they are in line with our sustainability goals. All executive members of the Management Team are assigned ownership of specific goals. The Sustainability Committee consists of the Head of Investor Relations, Head of Legal, the MLRO and the Sustainability Manager. The Sustainability Manager monitors progress and compiles the annual sustainability report for the company.

GiG holds licences in Malta, the UK, New Jersey (US), Schleswig-Holstein (Germany), Sweden and Spain (pending). 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 and a B2C operator is to provide tools and advice to our customers and end users in order to achieve this balance. We are committed to creating a fair and safe environment which ensures consumer protection and puts responsible gambling at the forefront of all our business processes.

Creating a sustainable business starts from within our operations. We find it of great importance to support employees so they thrive at work, and to provide them with training and development programmes which empower responsibility and encourage opportunities to lead. GiG has approximately 710 employees from 45 different nationalities, all of them connected across our offices in six countries. We highly value a non-discriminating, diverse and inclusive workforce, reflecting our global customer base and powered by innovation and growth.

“We want to improve the regulatory standpoint in the industry and empower our employees to think of ways to make the industry better, for everyone.”

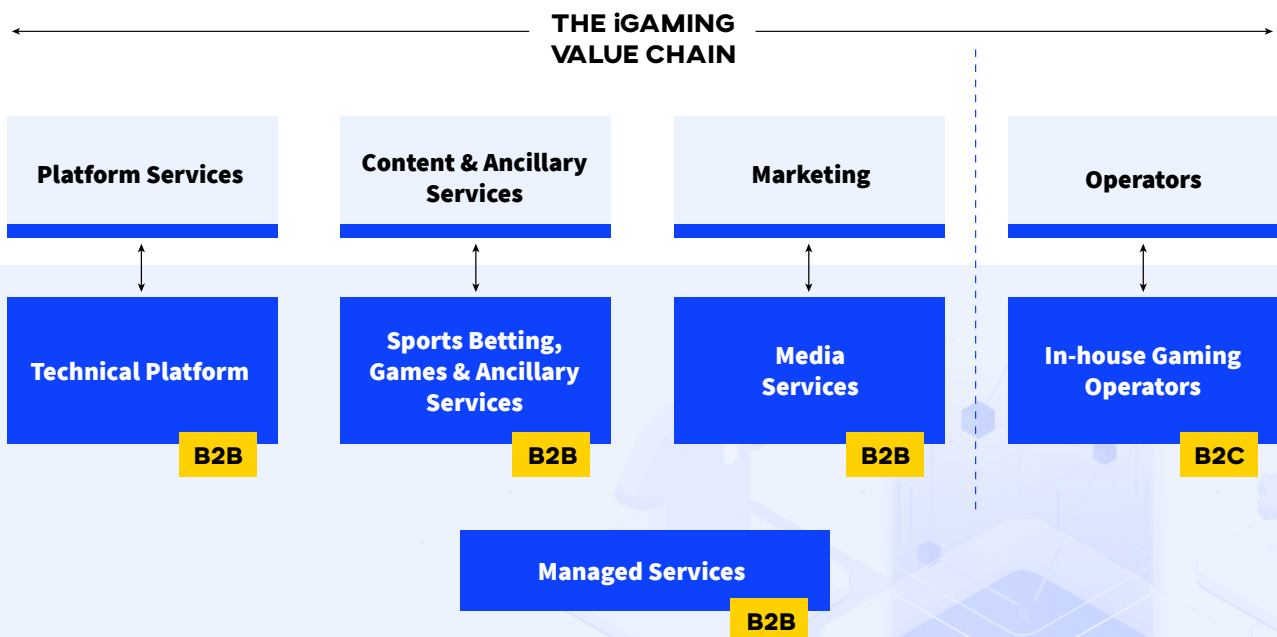
A SUSTAINABLE BUSINESS

Our Business

Financial Sustainability

GiG’s ecosystem explained as our base for running a financially sustainable business

- Robust revenue portfolio
- Optimisation and synergies from scale
- Unique new business opportunities covering the whole value chain of iGaming
- Offers solutions to support both offline/land-based and online casinos
- Operates in regulated and soon-to-be regulated markets



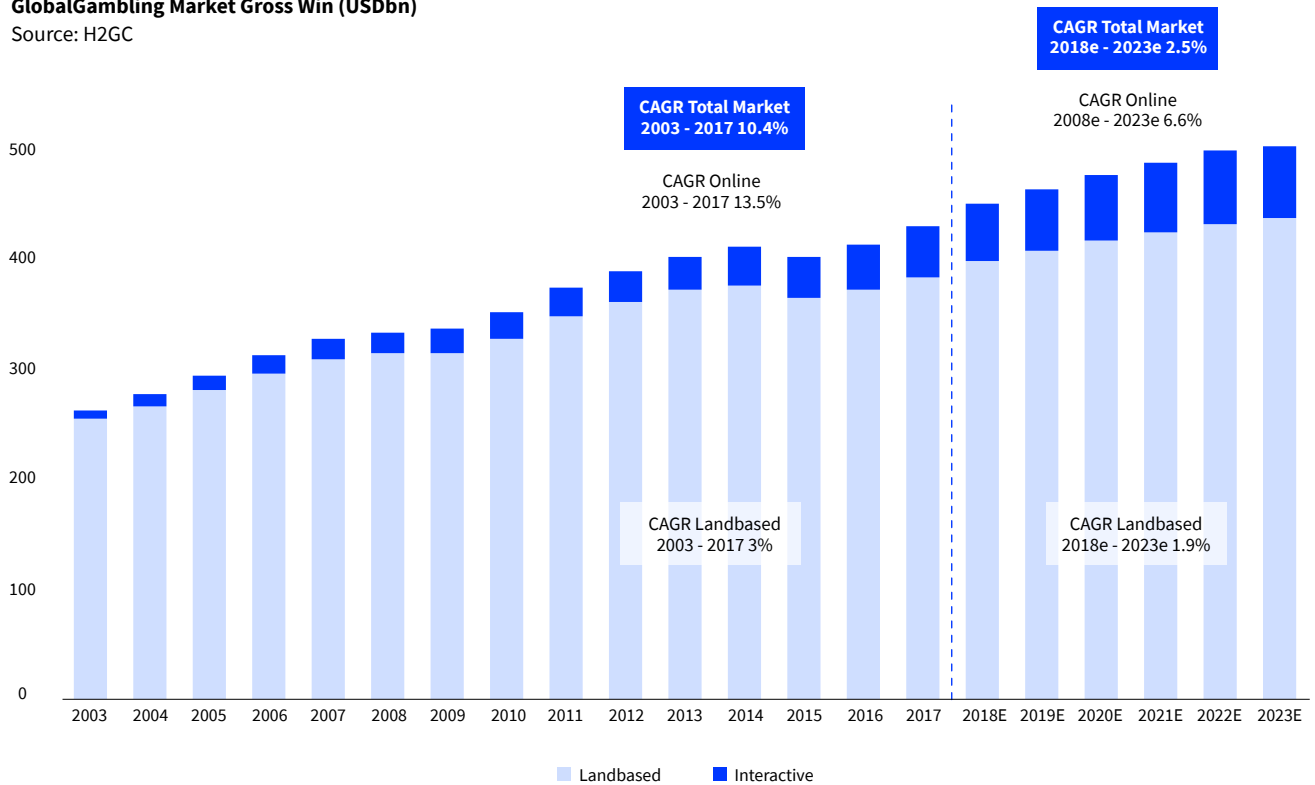
“At GiG, we create iGaming solutions for a sustainable future.”

Market Growth

The online gambling market grew by 13.5% from 2003 - 2017. An increasing proportion of revenues in the gambling market is shifting from landbased venues to online casinos. Offline is still significantly larger than online, however this digital transformation is leading to a tectonic shift of revenues in iGaming. Previously, the digital space had been left largely uncontested by the major offline operators; however, with an increasing share of wallet in digital gambling, combined with accelerating regulation (for example, the repeal of PASPA in the US), we are seeing an increasing interest in going online. GiG is perfectly positioned to support customers through the entire migration from landbased, offline to online gaming.

Global Gambling Market Gross Win (USDbn)

Source: H2GC



Our Strategy

Corporate Strategy

The growth and success of GiG since the business was founded in 2012 are based on three key aspects of its business model, which have set it apart from other gaming suppliers and operators:

- Innovation lies at the intersection of each gaming activity
- By owning the value chain, we improve margins and decrease price points
- By selling B2B we can scale

Entrepreneurial Focus

We want employees to be entrepreneurial and continuously focused on optimising and growing our business, and to improve serving end users in order to create long-term, loyal partnerships.

Long-Term, Loyal Partnerships

GiG’s service portfolio covers the entire iGaming value chain and its business model empowers continuous incremental improvements of products, services and offered solutions. Key to our circular business model is the incorporation of social responsibility at every intersection of each activity by a skilled workforce and special teams, such as the Player Safety Team, and using innovative technologies, such as machine learning and artificial intelligence. This enables us to create a fair and fun player environment, where interaction and pro-active outreach to customers is encouraged. This offers a safe user experience that protects from potential negative consequences of online gambling or minimises the harm caused by gambling. We believe building long-term, loyal partnerships with our customers is not only the right thing to do, it creates a long-term, sustainable business and adds value to all our owners and all other stakeholders.



“Our demand for new ideas, better tools and bigger data never stops.”



Sustainability Priority Areas

GiG has marked three priority areas in its social responsibility commitment within the sustainability strategy:

1. Fair and safe iGaming
2. Responsible marketing and advertising
3. Encourage employees to thrive

Every area will be explained further in the following chapters.



Our Sustainability Goal

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.

B2C CASINO	B2B TECHNICAL PLATFORM	GAMES	MEDIA
United Kingdom	United Kingdom (sports betting)	United Kingdom	New Jersey (US) (vendor registration)
Sweden	New Jersey (US)	Sweden	
Malta	Malta	New Jersey (US)	
Schleswig-Holstein (Germany)		Malta	
Spain (pending)		Croatia	
		Czech Republic	
		Denmark	
		Estonia	
		Hungary	
		Italy	
		Latvia	
		Lithuania	
		Spain	
		Colombia	

“In 2018, 48% of revenues came from regulated and soon-to-be regulated markets.”

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 and a B2C operator is to provide tools and advice to our customers and the end users so they are able to achieve this balance.

Player Sustainability

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 is investing in the legal, compliance and Player Safety Teams. Sustainability is a major driver of the business strategy and GiG is working towards incorporating facets throughout the whole value chain of customer-facing and business operations in all aspects of the business.

Both as an online operator and software supplier providing online gambling platform and services, GiG supports end users to comply with technical, legislative and responsible marketing demands.

We monitor customer accounts continuously and use data, reporting tools and transaction monitoring tools to identify playing patterns that may indicate problematic play, for example of people losing control. By adopting a duty of care we do not solely look at our risks; our primary focus is the player, whose wellbeing is at the heart of our operations. We interact with the player and suggest limits are set or advise the player to take a break. Where necessary we also recommend that a person consults a gambling help organisation and perhaps seeks treatment.

“We want to give compliance an edge by developing the best sustainability models for regulated markets.”



Statistical analysis shows 30% of self-exclusion happens very early in a player's lifetime, i.e. in the first 96 hours.*

By promoting safe gambling we believe this enables us to build a relationship with players and advise on tools like deposit limits tailored for each player that will contribute to a safer player journey and, at the same time, proactively respond to responsible gambling cases. GiG's operational practices include a dedicated team of player safety advisors that continuously monitors patterns and acts upon alerts by interacting with relevant customers to ensure they receive support and advice.

GiG will measure the success of its responsible gambling strategy by analysing and monitoring player behaviour and enabling a safer and longer player lifetime. We take our responsibilities very seriously and make use of data to monitor end users' player behaviour to detect signs of problem gambling. Our player safety advisors receive internal training so they can recognise and respond to responsible gambling cases in a professional manner.

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. For example, in January 2019, GiG has, together with three other online gambling companies, started a trade body: the Norwegian Trade Association for Online Gambling. The aim is to promote collaboration and advise on how to protect end users, the gambling companies and society as a whole in a regulated market and to educate and support relevant bodies with learnings from other jurisdictions.

*GiG internal data and research 2018

FAIR AND SAFE iGAMING

Ensuring consumer protection, building trust in a fair and safe player environment.

Responsible Gambling

GiG 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 to support, criminal activity. GiG is entirely committed to protecting children and vulnerable people from being exposed to potential harm or exploitation from gambling.

“We are creating a culture of responsible gambling to ensure compliance, adopt best practice and improve social impact.”

We believe gambling should be fair and fun at all times and want our 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 invested further 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 offering help and support.

“We adopt the best practices of responsible gambling and technical compliance.”

The Technical Compliance Team has also introduced tools to monitor, detect and alert on suspected 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.

“We use tools such as data analytics to improve the detection of adverse gambling behaviours.”

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.

We want to create an end user-friendly environment. We believe that in practice this requires a shift in thinking from reacting to issues as they arise to actively looking to prevent problem gambling happening in the first place.

Problem gambling can affect people from all age groups, income groups, cultures and professions. While some people develop gambling problems over an extended period of time, others develop them very quickly. If the addiction is not managed or treated, it can lead to financial difficulties, health issues, and struggles with relationships and family, together with other negative social impacts. For every one person with a gambling addiction, many more are affected in terms of friends and family.

“Our compliance operations and processes are continually audited.”

To increase understanding of problem gambling within our organisation, we have provided mandatory training on responsible gambling for every single GiG employee via the GiG Academy. In addition, we have trained over 75 employees in RG-related roles via an extensive responsible gambling course led by professional trainers from GamCare, the UK's leading provider of information, advice, support and free treatment for anyone affected by problem gambling. We prioritise the importance of employees' knowledge and skills to understand their individual and organisational responsibility towards responsible gambling, to understand how to identify problem gambling, and for some roles to have the knowledge to be able to conduct brief interventions and signpost for further support.

“We have a mandatory programme in place to inform and train our people on RG best practice.”

Player Safety Team

GiG's operational practices include a dedicated team of player safety advisors who continuously monitor behaviour and customer chats and act upon alerts by interacting with those customers to ensure they receive support and advice. Our player safety advisors receive internal training in order to be able to recognise and respond to responsible gambling cases in a professional manner.

There are cases where special circumstances may require different steps; in any case, every effort is made to strictly adhere to our licence terms and the relevant people and departments will be involved to resolve exceptional cases. Within GiG, such matters would be referred to the Player Safety Manager or the Responsible Gambling Manager.

While employees are not required to be experts in the psychology of problem gambling, the analysis of end users' accounts supports the drafting of end users' profiles to identify if the player can afford their gambling, from both a financial and/or psychological perspective, or if they may be presenting signs of trouble. Above all, it is important the interaction is an honest concern for end user wellbeing and offers the encouragement to act responsibly rather than simply fulfilling a regulatory requirement.

Identification and Verification

It is illegal for anyone under the age of 18, or such higher minimum legal age of majority as stipulated in the jurisdiction of residence, to open an account or to gamble and any such instance is treated with due care immediately. 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. PEP customers 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 are 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.

Reporting Tools

GiG has developed numerous reports with the objective of identifying end users who may present problem gambling behaviour and/or those at risk from developing such behaviours. Reports are executed daily in order to monitor and proactively interact with end users with patterns of concern. Accounts appearing on these reports or escalated, are manually reviewed by the Player Safety Team to determine whether a customer interaction or any other action is required.

GiG has created a Player Deposit Analysis-tool, also known as the Average Deposit Report, which is capable of calculating the average deposits of an end user over his/her lifetime. The tool is also able to flag deposits in excess of that average. Our commitment to responsible gambling best practices ensures we are continuously developing and optimising existing tools. Our ultimate objective is to have technology assisting us in our responsible gambling and anti-money laundering processes in order to carry out, on end user accounts, real time transaction monitoring.

“We are committed to investing in people and developing new tools which promote a safe, fair and fun gambling environment and protect the end user.”

Responsible Gambling Information

End users are provided with information on how to gamble responsibly and how to access information about, and help in respect of, problem gambling. This information is provided in English and in any other language the website is translated into and is accessible from the website footer.

Case Study: Rizk Casino, The Use of Machine Learning and Artificial Intelligence

GiG selects variables that contain information to predict our target. We set a combination of variables with Rizk Casino and have seen an increase in player lifetime over this period.

By using data-driven tools like machine learning and artificial intelligence, we are committed to creating the best and fairest iGaming experiences. Our motivation for building such a model:

- Social responsibility: early identification of at-risk customers
- Player value prediction at point of registration
- Improved understanding of customer: targeted retention (understanding individual end user DNA)
- Automated and personalised UX

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 KYC checks. We have tools to identify all end users and to verify data once specific transaction activity is detected or defined thresholds are met; for example first deposits, or upon reaching the EUR 2,000 cumulative thresholds (UKGC guideline). One of the main drivers is to protect our operation from fraudulent transactions. The other is to prevent end users from being able to launder money using our services.

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 information or other matter, which may give rise to any knowledge or suspicion of money laundering and/or the funding of terrorism, to the MLRO.

IT Security

At GiG, the confidentiality, availability and integrity of our customer 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. 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).

“The ISO 27001 certificate shows the Company’s ongoing and systematic approach to managing and protecting company and customer data.”

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.



RESPONSIBLE MARKETING AND ADVERTISING

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, 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 are 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 advertisement communications 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) used to promote our brands and any information related to them, by us or by any third party acting on our behalf, and we ensure, amongst other, that marketing communications must:

- Not mislead
- Present qualifications clearly
- Be socially responsible and shall 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, related to all our brands, on our own or on third-party websites, and we ensure, amongst other, that advertisements must 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

Prevention of Advertising with Appeal to Children and Young Persons

Marketing and advertising communications are not aimed at or should not appeal to children and persons younger than 18 (or any other illegal age for gambling in any jurisdiction GiG operates) and should carry appropriate warnings about underage gambling.

On our responsible gambling pages we offer information on various protection tools which parents and guardians can implement to prevent underage gambling. For example, we promote the use of CYBERSitter, a filtering software allowing parents to add sites they would like to block.

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 under-18s.

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 picture not showing cartoons or elements which are potentially appealing to children or young persons

Marketing Compliance Clearance

The Marketing Compliance Team is well integrated with the marketing teams and provides guidelines which are to be followed so that our marketing is responsible and meets the regulatory standards of moderation. In addition, the team carries out an oversight function to ensure that published marketing material follows internal guidelines and policies.

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.

“We are developing products and services to support our customers to be compliant.”

ENCOURAGE EMPLOYEES TO THRIVE

Training and Development

GiG provides accelerated learning and development programmes to push careers into the most important fields of our business, supporting a creative and collaborative work environment. We continuously focus on the personal development of every employee by offering educational programmes and courses.

We developed GiG Academy, an online training portal providing a wealth of interactive online courses and learning modules for all sectors of our business. The Responsible Gambling module, Anti-Money Laundering module and Information Security training are mandatory for all employees. 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.

“We built an online Academy to inform and train our people on best practice.”



49

courses
available on
GiG Academy



3,936

training hours
spent at the
GiG Academy

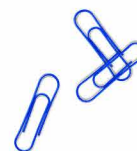
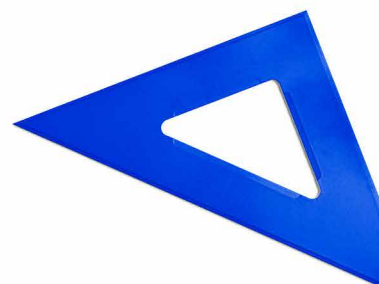


379

classroom
training
courses given



Auditorium at the heart of GiG's head office for people to attend workshops or practice communication and presentation skills.



Transparency and Alignment

We believe in shared, clear and challenging goals aimed at guiding employees towards contributing to the overall success of the organisation. GiG has implemented a performance management system based on monitoring OKRs. Aspiring to GiG's strategic intent, this allows each department and employee to contribute to the company strategy. Review assessments of OKR are conducted on a quarterly basis. We believe it is of key value to our organisation to keep our teams engaged and proud of the GiG strategy, in order to support motivation and ensure transparency in communication.

Integrity Policies

Job Selection Due Diligence

It is imperative that our employees are of undisputed integrity. To ensure this objective a procedure is followed whereby all employees must produce a CV and a motivation letter during the application procedure; for some roles additional tests are required. Since some roles pose a higher risk to the company's operation, 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 reference and criminal record checks.

Insider and Trading Policy

The Insider and Trading Policy regulates how all employees and consultants are required to treat sensitive information and trading concerning 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 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. The Whistleblowing Risk Committee will investigate the report. If the information concerns a management or C-level position, the reporting line will be escalated to Board of Directors level. More information can be found on the website www.gig.com under the Corporate Governance section.

Family-friendly Measures Across All our Offices

GiG is committed to supporting parenthood and offers one of the most progressive leave entitlements of its kind in the industry for 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.

We find it essential to provide an attractive and inspiring work environment that will enhance employees' performance and wellbeing at the workplace. Our ways of working and flexible environment allow us to adapt to the ever-changing world. We offer employees good working conditions which will help them maintain a good work-life balance.

“We want our employees to be safe, healthy and engaged with top priorities.”



“We encourage employees to be the best version of themselves.”



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.

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

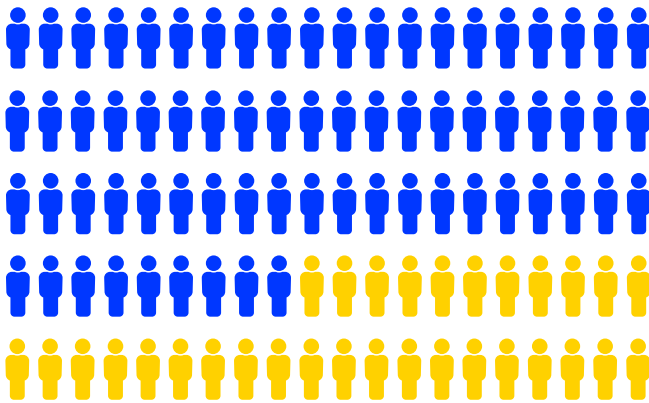
Employee engagement: Increasing awareness on the importance of diversity, inclusion and equal opportunities; preparing training for all employees to address unconscious bias; and supporting employee networking groups such as the All-in Diversity Project and Girls in Tech.

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.

Examples of programmes and initiatives:

- Founding member of the All-In Diversity Project, an industry-driven initiative to benchmark diversity, equality and inclusion for the global betting and gaming sector. We collect data through employee surveys and the All-Index, a standard index which is set to be the definitive benchmarking tool for the gambling industry to measure progress towards inclusion in the workplace.
- Supporting and engaging in initiatives that inspire women to pursue careers in the fields of science, technology, engineering and mathematics (STEM).

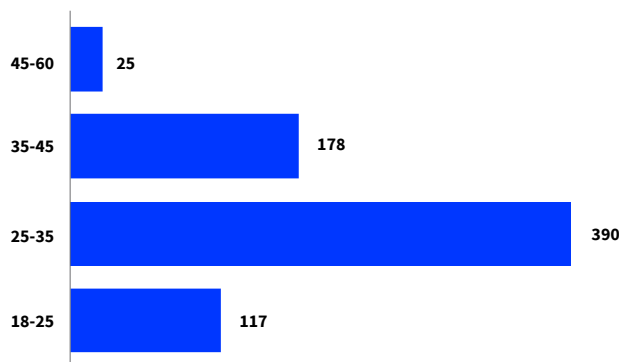


TOTAL EMPLOYEES: 710

- Male: 69%
- Female: 31%

“We want to encourage everyone to be able to be who they are without fear.”

BREAKDOWN BY AGE BRACKET:



45 DIFFERENT NATIONALITIES

135 MANAGERS

8 EXECUTIVE MANAGERS

6 BOARD DIRECTORS

CORPORATE SOCIAL RESPONSIBILITY

Supporting Charities and NGOs

In 2018 GiG made monetary donations to GambleAware, a charity recognised by the UKGC as an independent organisation with a formal commitment to commission research, education and treatment in accordance with the UK National Responsible Gambling Strategy. The annual donation ensures compliance with the Social Responsibility Codes of the UKGC’s Licence Conditions and Code of Practice (LCCP).

We aim to join forces with other peers and promote an open dialogue with charities and NGOs in order to learn from each other, continue working together to address the challenge of minimising gambling-related harm, and promote a safe and trusted gambling environment.

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 and this is also where the largest number of employees per location is based. Some examples of our involvement in Malta are:

- The employee volunteering programme GiG Gives, to improve inclusion within the communities we operate in.
- Malta Marathon sponsorship. GiG promotes and encourages a healthy work-life balance, to ensure that our employees can give their best to family, friends and colleagues.
- Allied Rainbow Communities (ARC) sponsorship. GiG supports diversity and equality initiatives and with this sponsorship in particular Malta Pride 2018.

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.



5,680 HRS

available to GiG employees for volunteering



GiG hosted the Malta National Clean-up Day in its locality

EUR 15,000

raised by employee contributions and donated to local charities



Think About It
A value that guides our company culture

ENVIRONMENTAL FOOTPRINT



IN-OFFICE RECYCLING PROGRAMME

All waste in our offices, canteens and kitchens are separated.

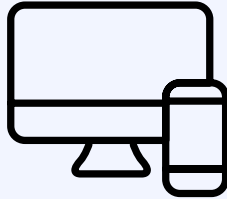
PROMOTING PAPERLESS WORKING

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



RESELLING IT EQUIPMENT

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



SMART ENERGY CONSUMPTION

Smart lighting is installed in our offices. Lights are **motion automated** and **save energy** at night and weekends.

REDUCING OUR CARBON FOOTPRINT

Two travel-free months in 2018 helped reduce our carbon footprint. Our smart **video conferencing** set-ups in each office connect employees internationally.



THINKING 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.

GRI INDEX

GiG's sustainability report is prepared according to the Global Reporting Initiative (GRI) sustainability reporting standards, 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. 5, AR p. 10, 49	
	102-2	Activities, brands, products and services	SR p. 5, AR p. 10-11, 19-25	
	102-3	Location of headquarters	SR p. 30, AR p. 94	
	102-4	Location of operations	SR p. 30	
	102-5	Ownership and legal form	AR p. 34, 49	
	102-6	Markets served	SR p. 11	
	102-7	Scale of the organisation	AR p. 46	
	102-8	Information on employees and other workers	SR p. 6	
	102-9	Supply chain	SR p. 5	
	102-10	Significant changes to the organisation and supply chain	AR p. 46	Changes in management
	102-11	Precautionary principle or approach	SR p. 9-15	
	102-12	External initiatives	SR p. 22-23	
	102-13	Membership of associations	SR p. 12	
Strategy				
	102-14	Statement from senior decision-maker	SR p. 9	
	102-15	Key impacts, risks, and opportunities	SR p. 7-10	
Ethics and integrity				
	102-16	Values, principles, standards and norms of behaviour	SR p. 6, 9-10	
	102-17	Mechanisms for advice and concerns about ethics	SR p. 20	Whistleblowing policy
Governance				
	102-18	Governance structure	AR p. 49-52	
	102-19	Delegating authority	AR p. 49	
	102-20	Executive-level responsibility for economic, environmental and social topics	AR p. 55	
	102-22	Composition of the highest governance body and its committees	AR p. 45	
	102-23	Chair of the highest governance body	AR p. 45	
Reporting practice				
	102-45	Entities included in the consolidated financial statement	AR p. 80-81	
	102-46	Defining report content and topic boundaries	SR p. 10	
	102-47	List of material topics	SR p. 10	
	102-49	Changes in reporting		Not applicable since this is GiG's first SR
	102-50	Reporting period	SR p. 6	
	102-51	Date of most recent report		Not applicable since this is GiG's first SR
	102-52	Reporting cycle	SR p. 6	
	102-53	Contact point for questions regarding the report	SR p. 30	
	102-54	Claims of reporting in accordance with the GRI Standards	SR p. 6, SR p. 26	
	102-55	GRI content index	SR p. 26-28	

Material topics

ECONOMIC IMPACT				
Economic performance				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10	
GRI201: Economic Performance	201-1	Direct economic value generated and distributed	SR p. 7-9	
	201-2	Financial implications and other risks and opportunities	AR p. 32	
Anti-corruption				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10	
GRI205: Anti-corruption	205-1	Operations assessed for risks related to corruption	SR p. 15, AR p. 27	
	205-2	Communication and training about anti-corruption policies and procedures	SR p. 19	
ENVIRONMENTAL IMPACT				
Energy				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10	
GRI302: Energy	302-4	Reduction in energy consumption	SR p. 24	
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. 24	
Effluents and waste				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10	
GRI306: effluents and waste	306-2	Waste by type and disposal method	SR p. 24	
SOCIAL IMPACT				
Employment				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10	
GRI401: Employment	401-2	Benefits provided to full-time employees	SR p. 19-23	
	401-3	Parental leave	SR p. 20	
Training and education				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10	
GRI404: Training and education	404-1	Average hours of training per year per employee	SR p. 22	
	404-2	Programs for upgrading employee skills and transition assistance programs	SR p. 19	
	404-3	Percentage of employees receiving regular performance and career development reviews	SR p. 20	
Diversity and equal opportunity				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10	
GRI405: Diversity and equal opportunities	405-1	Diversity of governance bodies and employees	SR p. 22	
Local Communities				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10	
GRI413: Local Communities	413-2	Operations with local community engagement, impact assessments, and developments	SR p. 23	Community service hours contributed

Responsible gambling / Fair and safe iGaming (Customer Health and Safety)				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10	
GRI416: Customer Health and Safety	416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	SR p. 13-16	Fair and safe iGaming
Responsible marketing and advertising				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10	
GRI417: Marketing and labelling	417-1	Requirements for product and service information and labelling	SR p. 17-18	
	417-3	Incidents of non-compliance concerning marketing communications	SR p. 17-18	
Customer privacy				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10	
GRI418: Customer Privacy	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	SR p. 15	
Socioeconomic Compliance				
Management Approach	103-1-3	Explanation of the material topic and its boundary	SR p. 10	
GRI419: Socioeconomic compliance	419-1	Non-compliance with laws and regulations in the social and economic area	SR p. 13-16, 17-18	Fair and safe iGaming, Responsible marketing and advertising

GLOSSARY

ASA	Advertising Standards Authority
AML	Anti-Money Laundering
ARC	Allied Rainbow Communities
AR	Annual Report
B2B	Business-to-Business
B2C	Business-to-Consumer
CAP	Committee of Advertising Practice
CAGR	Compound Annual Growth Rate
EBITDA	Earnings Before Interest, Tax, Depreciation and Amortisation
EU	European Union
FIAU	Financial Intelligence Analysis Unit
FIPO	Finanspolisen Rikskriminalpolisen
GDPR	General Data Protection Regulation
GiG	Gaming Innovation Group
ISMS	Information Security Management System
ISO	International Organization for Standardisation
KYC	Know Your Customer
LCCP	Licence Conditions and Codes of Practice
MGA	Malta Gaming Authority
MLRO	Money Laundering Reporting Officer
NCA	National Crime Agency
NGO	Non-Governmental Organisation
OKR	Objectives and Key Results
PASPA	Professional and Amateur Sports Protection Act
PEP	Politically Exposed Person
RG	Responsible Gambling
SR	Sustainability Report
UK	United Kingdom
UKAS	United Kingdom Accreditation Services
UKGC	United Kingdom Gambling Commission
US	United States
UX	User Experience

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