

Safer Gambling Policy

Name	Description
Document Name	Safer Gambling Policy
Classification	Internal
Version	1.0
Author/Owner	Compliance
Sign off Approvals	CEO
Distribution Date	August 2023
Next Review Date	August 2024

Change Control

version	Date	Name	Role	Comment
1.0	August	Naomi Koops	Safer Gambling Coordinator	New Policy

Sign off/ Approval.

version	Date	Name	Role	Comment
1.0	August 2023	Ebbe Groes	CEO	Sign off

Document Distribution

Department	Organization
All	EveryMatrix group

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1. Purpose

We acknowledge the responsibility we have towards our employees, our clients, players of our clients, and the broader community. The purpose of this policy is to outline our commitment to promoting safer gambling practices, ensuring player protection, and maintaining compliance with all relevant laws and regulation.

We recognize that gambling is a form of entertainment and must be enjoyed responsibly. Our primary objective is to advocate for safer gambling by providing a safe and secure environment where players can engage in gaming activities safely. We firmly believe that a balanced approach to gambling is essential to safeguard players' well-being and the integrity of the gaming industry.

By implementing a robust safer gambling policy, we aim to protect vulnerable individuals from the adverse effects of problem gambling and provide a supportive platform for those seeking assistance.

2. Applicability

The applicability of this Policy spans across all dimensions of our operations. By recognizing the scope of its application and involving all relevant stakeholders, we ensure that safer gambling remains at the forefront of our business practices and ultimately contributes to a safer and sustainable gaming environment.

3. Governance

The EveryMatrix Safer Gambling Committee (the Committee) is responsible for effectively implementing and continuously improving our Safer Gambling initiatives.

The committee is endorsed by the Board and attended by the CEO. Our Safer Gambling coordinator is actively engaged in leading our safer gambling endeavors.

Our Safer Gambling Coordinator is Naomi Koops, reachable at: naomi.koops@everymatrix.com

Our Safer Gambling Committee Secretary is Magdalena Purice, reachable at: magda.purice@everymatrix.com

4. Responsibility

4.1. Safer Gambling Compliance Officers: Staying Informed and Reporting Insights

Our compliance officers play a pivotal role in cultivating a secure gambling environment. They are endorsed by management to engage in various SG events to stay updated on industry trends. Upon their return, they provide comprehensive reports, detailing insights, trends, research findings, and suggested improvements to enhance our safer gambling processes. This continuous learning loop drives our commitment to safer gambling.

4.2. Safer Gambling Coordinator: Compilation of Annual Report

Our Safer Gambling Coordinator ensures a comprehensive overview of our SG efforts. Collaborating with relevant stakeholders, the SG coordinator compiles a detailed annual sustainability report for the company and stakeholders, outlining our safer gambling initiatives.

4.3. Safer Gambling Secretary: Documentation, Communication, and Goal Support

Responsible for accurate and transparent communication, the Secretary records and documents all committee discussions and decisions. They also support the Safer Gambling Coordinator in achieving company safer gambling objectives.

5. Communication and integration of feedback

5.1. Internal stakeholders' feedback:

We've established a clear process to ensure internal stakeholders play a relevant role in shaping our safer gambling initiatives.

Submission of Feedback: Internal stakeholders can submit their feedback, concerns, or suggestions via the open agenda or through direct communication with the Safer Gambling Secretary who compiles and includes these inputs in the agenda for the upcoming committee meeting.

Agenda Proposal: Inputs are collected and an agenda for the upcoming committee meeting is proposed by the Safer Gambling Secretary. This agenda is reviewed, endorsed, and documented through collaborative efforts with the Safer Gambling Coordinator.

Communication of Agenda: The endorsed agenda is shared with internal stakeholders via email, ensuring transparency and allowing time for preparation and participation in meaningful discussions.

Committee Meeting Discussion: Meetings involve comprehensive discussions on proposed agenda items, incorporating input from stakeholders. Insights from these discussions guide decisions and improvements for safer gambling measures.

Decision-Making Process: Proposals are collectively reviewed within the Safer Gambling Committee, with final decisions endorsed by our CEO. Outcomes are documented in meeting minutes.

Evaluation of Approved Initiatives: Approved measures are continually evaluated in quarterly SG committee meetings, and subsequently in the annual SG report. Their progress and impact are closely monitored through meeting minutes.

Documentation and Transparency: We document all committee initiatives, discussions, and evaluations in detailed meeting minutes stored in our SharePoint folder.

Our comprehensive Safer Gambling Report, summarizing yearly efforts and accomplishments, follows the same meticulous documentation process. This systematic approach reflects our commitment to maintaining integrity and accountability.

5.2. Industry feedback:

Our SG committee representatives actively participate in industry conferences, promoting collaboration with competitors and stakeholders and providing valuable industry feedback by reporting back to the Committee.

5.3. Client Feedback:

We maintain transparent communication with clients via dedicated account managers, who serve as direct conduits for addressing client feedback and concerns about SG and CSR. Additionally, these managers channel client feedback to the Committee, ensuring that valuable insights are considered for future business decisions.

6. Guiding Principles

As a globally licensed entity, we strictly adhere to player protection measures mandated by Regulators. Beyond regulatory requirements, as associate members of the World Lottery Association (WLA), we are committed to the following guiding principles:

1. Adopt reasonable and balanced measures to achieve our objectives while safeguarding the interests of customers and vulnerable groups. Concurrently, upholding our respective commitments to maintaining public order within our jurisdiction.
2. Ensure that our practices and procedures reflect a harmonious blend of government regulations, operator self-regulation, and individual responsibility.
3. Develop practices concerning safer gambling based on a comprehensive understanding of relevant information and analysis of documented research.
4. Collaborate with stakeholders, including governments, non-governmental organizations, regulators, researchers, public health professionals, and the public, to share information, conduct research, and promote safer gambling widely, fostering a deeper understanding of gaming's social impact. More information is available in our stakeholder plan. In addition to this we will collaborate with third-party providers of safety software and services.
5. Promote safer gambling in all aspects of our activities, including the development, sale, and marketing of our products and activities. We will make reasonable efforts to ensure our agents do the same. ¹For more information, please refer to our Advertising and Marketing policy.
6. Provide the public with accurate and balanced information to enable individuals to make informed choices about gaming activities within the lotteries' jurisdiction. This commitment will include the following:

¹ In this context, our Agents would be outside advertising, marketing and PR agencies. Only marketing material which is produced in line with our Advertising and Marketing policy shall be approved for release to the public. We currently do not use Agents.

- a. That the marketing of lottery activities and products be subject to reasonable operator self-regulation and promote safer gambling practices and informed choices.
 - b. Those individuals shall be provided with accurate information about gaming and the risks associated with it, for example, organizing education programs.
7. Make a reasonable effort to monitor, test, and revise as appropriate, those activities and practices related to safer gambling. Our findings will be publicly reported annually within our broader sustainability report which will include the Safer Gambling report.
8. As an additional commitment which we set for ourselves, we will continuously scan the market for high quality services for age verification and problem gambling detection, seek to integrate leading solutions, and proactively offer such to our clients.

7. Research

Evidence-based decision making inspires the development of our product and service. Our commitment to comprehending gambling behaviours allows us to gain valuable insights into play patterns, motivations, and factors contributing to excessive or problematic play. Furthermore, through research, we aim to identify vulnerable populations, such as minors, individuals with mental health issues, or those facing financial difficulties, enabling us to implement effective interventions to safeguard vulnerable groups.

Research proposals are generated by relevant stakeholders and are presented during the Committee's quarterly meetings, as outlined in section 5. Communication and Integration of Feedback.

This research-oriented approach underscores our dedication to promoting safer gambling practices and ensuring the well-being of our customers.

8. Employee Program

As representatives of our company and in recognition of the fact that our employees are at higher risk of developing gambling-related harm, all staff will undergo yearly safer gambling general awareness training.

Specialized teams, such as advertising and marketing and game design, will receive tailored Safer Gambling training to address the specific needs of their positions.

Furthermore, we actively encourage attendance at seminars and external training courses related to safer gambling, as outlined in our Employee Learning and Development plan, thoughtfully developed, and managed by our Human Resources team.

To ensure the effectiveness of our Employee Program, systematic assessments will be conducted, documented, and reported on an annual basis. This commitment highlights our dedication to providing a responsible and supportive environment for our employees, fostering safer gambling practices within our organization.

9. Product and Service Development

EveryMatrix Management provides oversight and support for the development of flexible solutions encompassing a wide range of safer gambling controls. As a software supplier for the iGaming industry, EveryMatrix prioritizes client-centric development and actively collaborates with all our B2C clients and relevant stakeholders to refine and enhance Safer gambling features in accordance with local regulations in each jurisdiction and in alignment with the Principles of the World Lottery Association, of which we are members.

Whilst we develop our own games, we recognise that we can do more by way of assisting Operators to protect players from harm associated with gambling. To do this we collaborate with 3rd party solutions which incorporate the latest research into tools that are made available to players. Our clients can offer these tools to their players to help them understand gambling behaviours, control play and enable Operators to intervene to protect vulnerable users when appropriate.

The Safer Gambling Committee includes representation from the Games Design team, ensuring that ongoing product and service development is consistently aligned with Safer Gambling Principles. Decisions pertaining to game design undergo thorough documentation and are reported to the Safer Gambling Committee, with annual reporting from the Safer Gambling Coordinator by inclusion in the Safer Gambling Annual Report. This rigorous process demonstrates our unwavering commitment to embedding safer gambling practices at the core of our product and service offerings, safeguarding the well-being of players and upholding the highest standards of social responsibility.

10. Remote Gaming Environment

EveryMatrix Management takes active responsibility in supporting the development of a flexible solution that encompasses various safer gambling controls. As a software supplier for the iGaming industry, EveryMatrix is committed to client-oriented development and collaborates closely with all our B2C clients to refine and enhance Safer gambling features in alignment with local regulations in each jurisdiction.

The Safer Gambling Committee includes representation from the technical compliance team, ensuring a continuous review of our remote gaming environment with a focus on Safer Gambling Principles. Decisions concerning the Remote Gaming Environment undergo meticulous documentation and are reported to the Safer Gambling Committee, with annual reporting by the Safer Gambling Coordinator by inclusion in the Safer Gambling Annual Report.

This comprehensive approach underscores our dedication to embedding safer gambling practices into our remote gaming environment, ensuring a safe and secure gaming experience for all players while upholding the highest standards of regulatory compliance and social responsibility.

11. Advertising and marketing

We are committed to promoting safer gambling and ensuring the well-being of players. Whilst EveryMatrix is a pure B2B company and all of our marketing activity is aimed at professional decision makers in the industry and rather than at-risk players, we acknowledge that there are times when our messaging might carry over to player marketing and so we must ensure that all marketing

materials reflects this commitment and include safer gambling messaging, helpline information, and links to self-exclusion programs where appropriate.

Our guiding principles for marketing materials are as follows:

- I. Emphasize the fun and entertaining aspects of playing gaming products and/or the public benefit derived from such play, without denigrating non-players or implying unrealistic life-changing outcomes from winning.
- II. Do not portray product abuse, excessive play, or illegal activity, and it do not suggest in any way that excessive, irresponsible, or illegal gaming is amusing or acceptable behaviour. We do not encourage anonymous play or secrecy around gambling.
- III. Do not glamorize inappropriate use of the product and is not knowingly placed adjacent to other media glamorizing or dramatizing inappropriate use of the product. Inappropriate can be considered as positioning in a way that is culturally or socially in poor taste or encourages product use with other potentially addictive products.
- IV. Do not imply or state that gambling activity guarantees or increases social, financial, or personal success, or enhances self-esteem or likeability.
- V. Do not promote gaming as an alternative to employment, investment, or financial security, or as a solution to personal financial difficulties.
- VI. Do not contain from making false promises or presenting winning as the probable outcome or implying that chances of winning increase with prolonged play.
- VII. Do not suggest that skill can influence the outcome of non-skill-based games.
- VIII. Do not create unrealistic expectations of high prizes for all participating players.
- IX. Do not create a false sense of urgency or pressure that would lead reasonable individuals to feel compelled to participate or act quickly.
- X. Do not directly advertise or target vulnerable populations, disadvantaged groups, or encourage problem gambling. Do not use cultural symbols or references that play on fear or superstitions.
- XI. Marketing efforts do not appeal to persons below the legal age to play, through the media selection, style, presentation, content, or context in which these appear.

All external marketing communications undergo careful documentation and approval by the Compliance team, ensuring alignment with the high safety standards which we hold ourselves to .

To reinforce safer gambling messaging, all marketing shall prominently display the 18+ logo and the words 'play responsibly.' Additionally, links to external support groups, such as [GambleAware®: Gambling Help & Gambling Addiction | BeGambleAware](#), will be provided where feasible.

12. Client Awareness

As an identified key stakeholder, client awareness on the topic of Safer Gambling is imperative. We will ensure that our clients are aware of the latest Safer Gambling functions of our games, and we will provide education on Safer Gambling initiatives that aims to protect their players from harm associated with gambling.

Our commitment to client education on Safer Gambling is resolute. Account Managers hold the responsibility of ensuring that client training and education on Safer Gambling initiatives are offered. Any feedback received from clients regarding Safer Gambling is meticulously documented and communicated to the Safer Gambling Committee.

13. Stakeholder Engagement

Stakeholders are individuals, groups, or entities that have an interest or stake in our business. They can be both internal and external to the organization and can have various levels of influence or impact on its operations, decisions, and outcomes.

We have assessed the following as relevant stakeholders:

Customers and their Players: The primary stakeholders in our gambling company are the customers and players who engage in gambling activities.

Employees: Employees are an essential stakeholder group, including game designers, compliance teams, customer support teams, marketing personnel, and others involved in the company's operations.

Shareholders: Shareholders wholly endorse the company in its Safer gambling efforts. A report to the board is provided annually together with Safer Gambling Committee meeting minutes.

Board of Directors: A representative of the Board is included in the Safer Gambling Committee. Minutes of committee meetings are provided to the Board.

Regulators and Government Authorities: We consider government bodies and regulators to be crucial stakeholders in overseeing compliance and ensuring fair and safer gambling practices. Our compliance team together with the Safer Gambling Coordinator ensure that we are continually abreast of new developments and that these are incorporated into our policies and procedures.

Suppliers and Business Partners: Stakeholders in the supply chain, including payment processors, KYC providers, and other business partners, have an interest in the company's success and reliability and are themselves often subject to regulatory requirements intended to provide a safe place to gamble.

Local Communities: As a supplier of gambling products and services we acknowledge the potential negative impact of gambling related harm on local communities in terms of employment opportunities, tourism, and socio-economic factors.

Advocacy Groups and Support Organizations or safer gambling associations such as Be Gamble Aware have an interest in ensuring that the company promotes safer gambling and addresses potential social issues associated with gambling.

Competitors: Competing gambling companies are stakeholders with whom the company must navigate market dynamics, competition, and industry trends.

Media and Public: we understand that the public, as well as media outlets, have an interest in the company's activities, especially when it comes to safer gambling practices, corporate social responsibility, and potential controversies.

Through meaningful engagement with the above-listed stakeholders, we can better understand their perspectives, address concerns, and work collaboratively to foster a socially responsible and sustainable approach to gambling operations.

For more information see our Stakeholder mapping maintained by the Safer gambling Coordinator who is responsible for assessing the effectiveness of our engagements.

The Safer Gambling Committee will review stakeholder engagement quarterly and the Safer Gambling coordinator will provide an annual report on the effectiveness of our stakeholder engagements related to Safer Gambling.

14. Reporting

To assess the impact and effectiveness of our Safer Gambling measures, the Safer Gambling Committee will review the outcomes of this policy during Quarterly meetings.

The Safer Gambling Committee recognizes the critical importance of transparent and comprehensive reporting to gauge the effectiveness of our safer gambling initiatives. By adhering to a structured reporting framework, we ensure accountability, engage stakeholders, and continuously improve our approach to promoting responsible gambling practices.

14.1. Sustainability Report Compilation

The Safer Gambling Coordinator, in collaboration with relevant stakeholders, undertakes the responsibility of compiling a comprehensive sustainability report that highlights our safer gambling endeavors.

This report serves as a condensed summary of our sustainability endeavors, showcasing our commitment to safer gambling practices, and assessing our initiatives and annual progress.

The annual sustainability report is structured to include dedicated sections that comprehensively cover the following areas as outlined in our Safer Gambling Policy:

- a. Research
- b. Employee Program
- c. Product and Service Development
- d. Remote Gaming Environment
- e. Advertising and Marketing
- f. Client Awareness
- g. Stakeholder Engagement

Each section provides detailed insights, accomplishments, challenges, and future strategies related to safer gambling within the respective domain.

14.2. Transparency and Accountability

The sustainability report is presented during the final Safer Gambling Committee meeting of the year, fostering an environment of accountability and openness.

The report's contents are reviewed, discussed, and validated by committee members, ensuring accuracy and relevance.

Subsequently, the report is presented to the company's Board of Directors, shared with employees across the organization via our HR platform (HiBob), and made available to the public through publication on our dedicated sustainability webpage.

14.3. Assessment of progress

Starting with the second yearly report, the sustainability report includes a comprehensive comparison between the current year's assessment of safer gambling efforts and the preceding year's achievements.

This comparative analysis serves as a dynamic tool to measure our progress, identify trends, and ascertain the impact of our initiatives over time.

Where deficiencies are identified, the Safer Gambling Committee takes proactive measures to address these gaps in the following year's plan, reinforcing our commitment to continuous improvement.

The following **KPIs** will be used as guidance to assess the success of our SG efforts for each section:

Research:

- **Number of Academic Partnerships:** Measure the number of collaborations with academic institutions for research related to safer gambling.
- **Research Output Impact:** Assess the impact of safer gambling research conducted by tracking how the findings have influenced product design, policies, or player education.

Employee Program:

- **Training Completion Rate:** Measure the percentage of employees who successfully complete the required safer gambling training.

Product and Service Development:

- Number of Safer Gambling Features Developed: Measure the quantity of new safer gambling features integrated into the software and services provided.
- Number of KYC and Safer Gambling providers integrated into the EveryMatrix gaming platform.
- Utilization Rate of Safer Gambling Features: Track how often the responsible gambling tools and features within the software are acquired by the B2B clients.

Advertising and Marketing:

- Compliance with Advertising Guidelines: Measure the percentage of advertising campaigns that adhere to our safer gambling guidelines.

Client Awareness:

- Client Feedback on Safer Gambling Information: Gather feedback from clients on the effectiveness and quality of the safer gambling information provided to them.

Stakeholder Engagement:

- Participation in SG Education Programs: Measure the engagement level of clients in educational programs related to safer gambling that the company provides.
- Stakeholder Feedback Incorporation: Track the number of instances where clients feedback led to improvements in safer gambling measures.

Shareholders (CEO and C-Level):

- Support for SG Initiatives: Assess the level of support and engagement of the CEO and C-level executives in promoting and endorsing safer gambling initiatives.

Regulators:

- Regulatory Compliance: Measure the number of successful regulatory audits, the number of interventions, or fines related to safer gambling.

Collaborations with NGOs and Advocacy Groups:

1. Level of Collaboration: Evaluate the extent of collaboration with NGOs (e.g., Be Gamble Aware, BetBlocker) to integrate safer gambling tools and resources into our software solutions.

Local Communities:

- Impact on Local Communities: Measure the impact of the company's safer gambling efforts on the local community, such as changes in the number of job applicants or community perceptions.

Media and Public:

- Negative News Incidents: Monitor the occurrence of negative news incidents related to our company's safer gambling measures and the company's response to them.

Reporting:

- Progress Over Time: Compare the findings and outcomes of previous reports to identify areas of improvement and progress in safer gambling efforts.