

KTO
GROUP

CODE OF CONDUCT

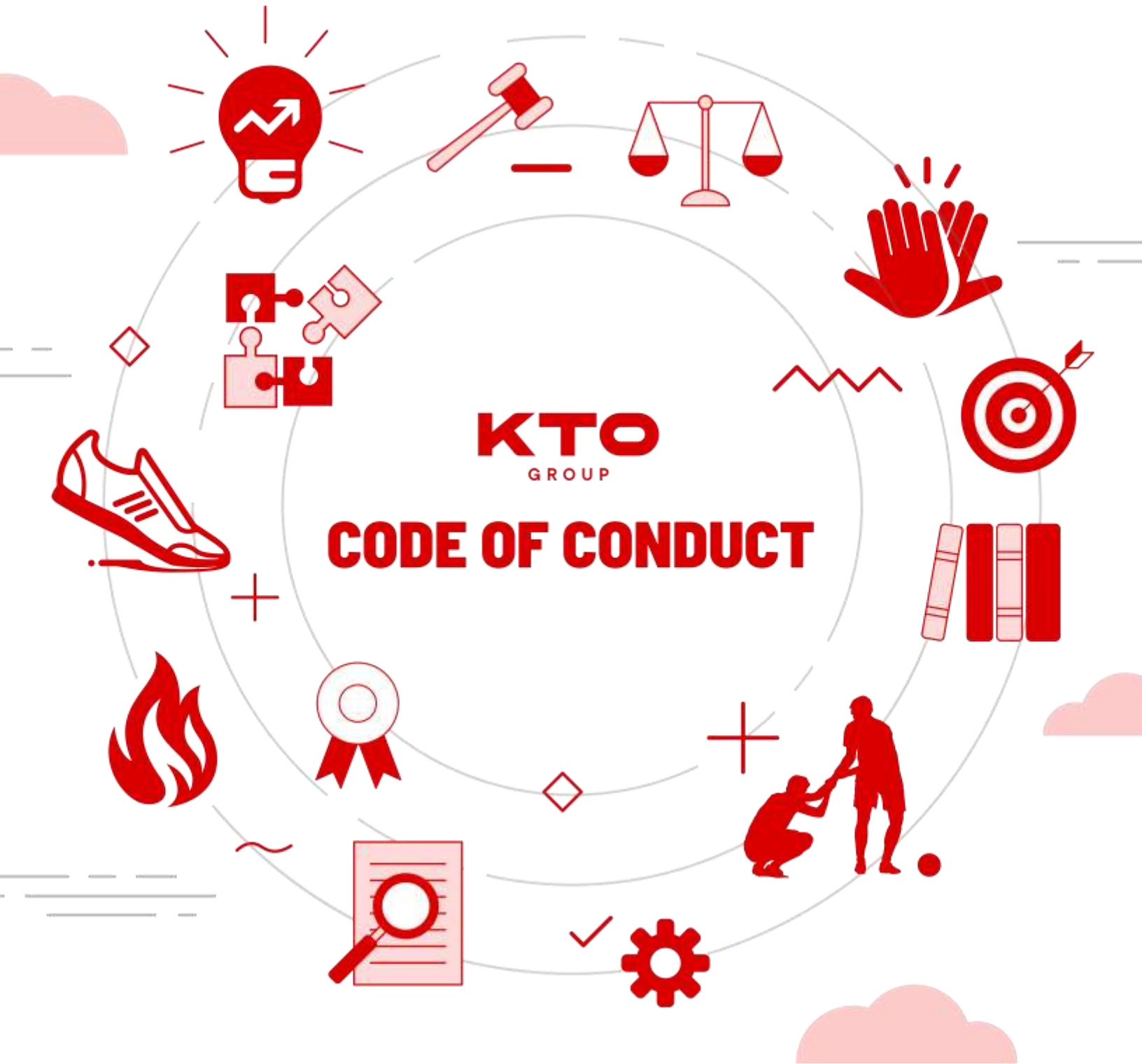


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OUR CORE VALUES

KTO core values encompass fundamental beliefs and aspirations that have fuelled our growth and achievements throughout our journey. These core values are what enable us to make contributions for all our stakeholders.



**WALK IN
THEIR SHOES**

Care & Empathy

Care & Empathy

We go above and beyond in everything we do. We actively listen and seek to understand to provide unparalleled service. We support each other and understand that perspective comes in many different forms.



**TEAMS WIN
CHAMPIONSHIPS**

Teamwork

Teamwork

Through the power of teamwork we exceed the sum of our parts. Together we share our accomplishments. Together we will win.



FAIRPLAY

Integrity

Integrity

We act with integrity and respect. We believe everyone is accountable for their own actions. We endeavour to always act in the spirit of fair play.



**BURN
BRIGHT**

Passion

Passion

We are passionate about our people. We are passionate about our products. We have the courage to pursue our ideas.



**FIND A
BETTER WAY**

Ingenuity

Ingenuity

We are students of the game. We innovate and create and strive for the best solutions.

MESSAGE FROM THE CEO

To our shareholders, partners, officers, directors, managers, employees, contractors, suppliers, vendors, providers, consultants, counsels, agents, and representatives.

KTO has attained notable success in the last years, mainly marked by delivering exceptional online gambling services to our customers. It is important to bear in mind that our commitment extends beyond customer satisfaction; it also covers the implementation of our core values in our operation, contributing to increasing value to a diverse range of stakeholders.

We adhere to fair play. Integrity, teamwork, care, and empathy, passion and ingenuity form the foundational values that deeply underpin the essence of our company's name. "Know The Odds" is not a coincidence; rather, it stands as the primary bedrock of our company—a sincere invitation to all our customers to make informed decisions and relish gambling as an enjoyable pastime.

KTO's Code of Conduct derives directly from our core values, serving as a guiding framework for all of us to align our work with the principles we uphold. This Code outlines proper conduct in various situations and provides us with additional tools to address ambiguous scenarios.

We recognize that lasting success cannot be attained by sacrificing our core values and fair play standards for short-term convenience, therefore, each employee and contractor is required to thoroughly read and comprehend this Code, understanding its application to their respective roles.

Andreas Bardun
CEO

INTRODUCTION

To our Code of Conduct

Scope

KTO is an international online gambling company working in several countries, this situation exposes our operation to a diverse array of cultures, laws, and gambling regulations. As we navigate intricate legal contexts characterized by extensive different areas of the laws, and whilst we learn the local traditions, our goal is to ensure uniformity and adherence to these guidelines to meet the basic grounds of pertinent regulations. This Code is a crucial tool, aiding us in addressing these significant challenges.

Who does this Code of Conduct apply to?

KTO's shareholders, partners, officers, directors, managers, employees, contractors, suppliers, vendors, providers, consultants, counsels, agents, and representatives.

What does KTO expect from you?

KTO's expects you to carefully review and grasp the contents of this Code, discerning how it applies to your individual duties.

What steps should I take if I face difficulties applying the core values to a particular situation?

Please, remember that we endeavour to always act in the spirit of fair play, there are not admissible reason for breaches to this Code of Conduct; yet, if you find yourself in a challenging situation where it's tough to discern how to uphold fair play, it is advisable to seek guidance from your supervisor.

What should I do if I am aware of breaches of this Code of Conduct, but I am afraid of reporting them?

Please, remember that KTO condemns retaliation against individuals who genuinely report a noncompliance issue, and encourages all our stakeholders to report breaches of this Code of Conduct. If you suspect that you or someone else has faced retaliation for such actions, promptly report the incident to the Human Resources Team and the Legal Counsel.

The ongoing review and updating process of this Code of Conduct, along with other standards policies and procedures, ensures its responsiveness to evolving challenges. The Company is committed to transparent communication and will promptly share any new versions with employees and other pertinent stakeholders.

This Code of Conduct serves as a guide for ethical behaviour and integrity standards but does not constitute a binding employment contract. The issuance of this Code by KTO does not imply the creation of specific contractual rights or obligations.

HUMAN RIGHTS PROTECTION

KTO supports and respects the internationally proclaimed human rights.

Scope

1. Equality

KTO recognizes that all human beings are born free and equal in dignity and rights. We do not accept any distinctions, such as those based on race, color, sex, language, religion, political or other opinions, national or social origin, property, birth, or other status among our stakeholders.

KTO is pleased to foster multicultural settings and enjoys learning and sharing local traditions. Over time, we have cultivated a delightful tradition of sharing local customs, particularly through the lens of food, and we take great pride in fostering this practice. One of our greatest assets is the absence of distinctions based on the political, jurisdictional, or international status of the country or territory. We welcome everyone, and this is immediately reflected in the global knowledge of our organization.

2. Different religious beliefs in the workplace

KTO acknowledges that everyone has the right to freedom of thought, conscience, and religion, including the freedom to manifest their religion or belief. Even though others may hold different religious beliefs, we approach diverse perspectives with respect, care, and empathy.

3. Right to life, liberty, security, and association

As part of its social responsibility, KTO recognizes that all our stakeholders have the right to life, liberty, and the security of a person. We encourage our supply chain, whether digital or not, to combat slavery or servitude in all its modern forms and condemn torture, cruel, inhuman, or degrading treatment or punishments, as well as restrictions on freedom of movement. Likewise, the company recognizes the right to freedom of peaceful assembly and association. No one can be compelled to belong to an association, but we also recognize everyone's right to form and join trade unions for the protection of their interests.

4. Equal protection

KTO believes in the equality of all before the law, the right to recognition as a person, and the entitlement, without discrimination, to equal protection. Everyone is entitled to independent and impartial processes in full equality. KTO implements this belief by establishing internal procedures to ensure the principles of innocence, the right to defence, and due process before making decisions.

5. Privacy

In an era where information is perhaps one of our most important assets, safeguarding the privacy of our stakeholders is not just a commitment for us at KTO; it is part of our integrity core value. We staunchly recognize and uphold the right of every individual to legal protection against privacy interference. To represent this commitment, we have established measures aligned with the Data Protection legislations of the jurisdictions in which we operate.

6. Learning culture in the workplace

In our dynamic and ever-evolving world, the pursuit of knowledge is not just a personal endeavour but a collective journey that enriches both individuals and the organization. At KTO we recognize the intrinsic value of learning and the profound impact it has on professional and personal development. As we actively seek to expand our knowledge, we take immense pride in encouraging all our employees and contractors in their pursuit of learning and ongoing education. Learning at KTO is not confined to formal education alone; it thrives in collaborative environments. To facilitate this, we promote knowledge

sharing sessions where team members can present their insights, experiences, and newly acquired skills to their peers.

7. Rest and leisure

KTO envisions a cheerful, healthy workplace and acknowledges that everybody has the right to rest and leisure.

At KTO, we believe in the holistic development of our team members not only within the professional realm but also as engaged and culturally enriched individuals. We actively encourage our employees and contractors to immerse themselves in the vibrant tapestry of their communities, fostering a sense of connection and contributing to the broader societal ecosystem. Our commitment extends to promoting participation in cultural life, appreciation of the arts, and engagement with scientific advancements and their wide-reaching benefits.

WORKING CONDITIONS EMPLOYMENT & INCLUSION

KTO's practices in the workplace

Scope

We believe that teams win championships, and the cornerstone upon which we construct these teams is respect. Our commitment to respect-based leadership is unwavering, extending to all individuals we engage with in our professional endeavours. We also hold the belief that making fair employment decisions and ensuring equal opportunities are the best tools not only to bolster our ability to attract, retain, and cultivate a diverse pool of talented individuals but also to stimulate a rich framework of ideas and abilities.

We strongly promote and encourage a culture of mutual respect among all individuals no matter their gender, race, religion, or national origin. This culture of respect not only fosters a harmonious and inclusive environment but also enhances collaboration, communication, and overall well-being. Treating each other with dignity, and kindness is fundamental to build strong relationships and a positive work atmosphere.

Harassment is a violation that will not be tolerated within our organization. It is a serious offense that carries disciplinary sanctions. We are committed to creating a safe and respectful environment for all, where every individual is free from any form of violence. Our aim is to protect the well-being and dignity of our employees and maintain a workplace where everyone can thrive.

These methods described above serve as the basis for cultivating a pleasant workplace. By nurturing a setting that prioritizes respect and encourages us to walk in other's shoes, we foster a reflective mindset. Consequently, we cultivate an environment where innovation, equality, and creativity flourish. As a result, our customers and all other

stakeholders benefit from the fresh ideas and heightened dedication that this environment encourages.

1. Human Rights

In the realm of ethical business practices, the commitment to human rights is non-negotiable. A cornerstone of this commitment is:

1. the unequivocal support for the freedom of association
2. the effective recognition of the right to collective bargaining
3. support of elimination of all forms of forced and compulsory labour
4. the effective abolition of child labour
5. the elimination of discrimination in respect of employment and occupation

We recognize these rights as fundamental pillars in creating a workplace culture.

1.1 Unequivocal Support for the Freedom of Association

We endorse the fundamental human right to freedom of association according to Freedom of Association and Protection of the Right to Organise Convention, from 1948. This commitment means that we respect and protect the right of our employees to form or join trade unions and participate in collective bargaining without fear of retaliation or discrimination. KTO empowers the workforce to develop independent voices.

1.2. Effective Recognition of the Right to Collective Bargaining

We recognize and support the right to collective bargaining. By doing so, we ensure that the concerns and aspirations of our employees are considered in shaping workplace policies, ultimately leading to a more equitable and harmonious work environment.

1.3. Support for the Elimination of Forced and Compulsory Labor

We stand firm in our commitment to the elimination of all forms of forced and compulsory labor. This extends beyond our immediate workforce to encompass our entire supply chain. Through contract clauses and this Code Conduct, we work towards ensuring that our business operations are free from any form of coercion, servitude, or exploitation.

1.4. Effective Abolition of Child Labor

As part of our commitment to social responsibility, we actively and effectively work towards the abolition of child labour. This involves stringent age verification processes during the hiring phase and inclusion of contractual clauses to ensure that our operations, as well as those of our suppliers, do not involve the exploitation of children. Our aim is to provide a safe and nurturing environment for every individual within our sphere of influence.

1.5. Elimination of Discrimination in Respect of Employment and Occupation

Our commitment to fostering a diverse and inclusive workplace extends to the elimination of discrimination in all aspects of employment and occupation. We actively promote equal opportunities and strive to create a labour environment where individuals are evaluated based on their skills, capabilities, and discipline, rather than factors such as gender, race, religion, or national origin.

In embracing these five pillars of commitment, we recognize that our responsibility extends beyond business success to the well-being and dignity of every individual connected to our operations and by upholding human rights in the workplace, we not only adhere to legal and ethical standards but also contribute to the creation of a positive, empowered, and inclusive working environment that reflects the values we hold dear at KTO.

2. labour law compliance

Labour law provisions vary according to the jurisdiction. Our international experience has underscored the absence of a universally applicable standard for specific labour matters. While we are committed to upholding human rights, we recognize that the following aspects vary significantly across regions, and we will address them according to local law:

1. Employment contracts mandatory provisions and legal assumptions
2. Holiday entitlement
3. Sickness absence
4. Parental leave
5. Bereavement Leave
6. Grievance procedure
7. Working hours,
8. Remote work
9. Minimum wage,
10. Employment rights and benefits,
11. Performance and appraisals
12. Collective bargaining conditions, and
13. Workplace safety regulations

KTO encourages labour law research as an essential step before any decision-making process. This proactive approach involves a thorough examination of legal provisions and requirements relevant to the matter at hand. By conducting this research, the company aims to gain a deep understanding of the legal landscape, which enables well-informed, legally compliant procedures.

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HEALTH AND SAFETY AT WORK

KTO's practices in the workplace

Scope

Safety and health at work, often referred to as occupational safety and health (OSH), focuses on ensuring the well-being and protection of workers and contractors in the workplace. It encompasses a range of activities and practices aimed at preventing accidents, injuries, illnesses, and other work-related hazards. The primary goals of our safety and health at work program is to provide a safe and healthy working environment for employees and to minimize workplace risks.

Creating great workplace opportunities hinges on prioritizing health and safety. Our dedication to the core value of 'teamwork' entails taking responsibility for our workplace and showing consideration for the well-being of both our colleagues and ourselves.

The Company is dedicated to ongoing enhancement of its health and safety performance. This commitment is manifested through the establishment of policies and procedures aimed at fostering a robust workplace health and safety culture that adheres to all relevant local legal and regulatory requirements. These efforts encompass the mitigation of risks that could potentially harm employees, contractors, and business partners.

In the realm of safety and health at work programs, it's crucial to recognize that physical and mental illnesses are two broad categories of health conditions that can affect our employees and contractors. Physical illness refers to a wide range of medical conditions that primarily affect the body's physical health and functioning. Mental illness, also known as psychiatric or psychological conditions, encompasses a wide range of circumstances that primarily affect a person's mental and emotional well-being. These conditions can impact thoughts, emotions, behaviours, and overall mental functioning.

Physical illnesses and mental health are intricately connected, and it is entirely plausible that the presence of a physical illness can act as a catalyst for the development or exacerbation of a mental illness. This relationship is often referred to as the "mind-body connection". KTO vigorously encouraged its employees and contractors to take care of their mind-body connection.

The gambling sector is unique in its reliance on digital technology for its operations. Unlike many other industries, it doesn't involve the physical dangers that come with heavy machinery or harmful materials. However, this doesn't mean the industry is devoid of risks altogether.

As part of the overall risk assessment for the company, KTO recognizes that the transition to remote work doesn't inherently equate to risk reduction. Despite the shift in the work environment, potential hazards and dangers persist. Remote work introduces its own unique challenges that must be addressed to maintain a safe and healthy work environment. Therefore, we strongly encourage all our subsidiaries to engage in comprehensive risk management. This process involves identifying safety and health hazards, conducting analysis and evaluation, implementing effective controls, and continuously monitoring the situation.

FAIR COMMERCIAL PRACTICES

KTO practices in the market

Scope

A commercial practice shall be unfair if it significantly distorts or is likely to significantly distort the economic behaviour concerning the service for the average consumer whom it reaches or is directed to. Unfair commercial practices affect our customers, our competitors, and the market itself.

A commercial practice is considered misleading if it includes false information, making it untruthful or deceiving in any aspect. The misleading must have the potential to deceive the average consumer and influence them to make a transactional decision that they otherwise wouldn't have made.

A commercial practice is deemed aggressive if, within its factual context and considering all features and circumstances, it significantly impairs or is likely to significantly impair the average consumer's freedom of choice or conduct in relation to the product. This aggression can manifest through harassment, coercion (including the use of physical force), or undue influence. The ultimate result is that it causes or is likely to cause the consumer to make a transactional decision that they would not have taken otherwise. Fair commercial practices are the root of a sustainable and responsible business environment. At KTO, we are committed to upholding our core values that go beyond legal compliance, emphasizing integrity, care, and empathy in our interactions. These fair commercial practices are designed not only to ensure the satisfaction and trust of our customers but also to contribute to the overall well-being of the marketplace.

1. Transparency in Communication

We believe in open and honest communication with our customers, partners, and stakeholders. Our fair commercial practices involve providing clear information about our services, terms and conditions and our privacy policy. It's by design, not happenstance, that our motto centres on Knowing The Odds.

Transparency builds trust, and we are dedicated to fostering long-term relationships with our customers. We strongly recommend and encourage our contractors, vendors and providers to actively participate in our ongoing initiatives aimed at fostering transparent and open communication. All cooperation we can get in this endeavour is highly valued, as it contributes to the success of our partnership and the quality of service we provide to our customers.

2. Ethical Marketing and Advertising

Our commitment to fair commercial practices extends to our marketing and advertising strategies. We avoid deceptive or misleading tactics and ensure that our promotional efforts provide accurate representations of our offerings.

By adhering to the right standards in marketing, we seek to empower consumers to make informed choices when betting. We advise our contractors, vendors, and providers to actively engage in our ongoing efforts to promote ethical marketing and advertising.

3. Customer-Centric Approach

Understanding and addressing customer reasonable requirements, offering fair terms, and providing responsive customer service are our basis. This customer-centric approach is not just a business strategy but a reflection of our commitment to building relationships based on trust and satisfaction.

4. Minors Protection

Due to their ongoing brain development and a lack of fully developed cognitive abilities, children and adolescents are at a heightened risk of experiencing the negative consequences of gambling, as they may struggle to comprehend the associated risks and outcomes adequately.

Our commitment to safeguarding against minors accessing our platform is an ongoing effort, and we continuously strive to develop and implement advanced preventive controls. These measures are designed to ensure that individuals under the legal age are unable to gain entry to our platform, thereby upholding our responsibility to provide a safe and age-appropriate environment for all users. Our dedication to this endeavour remains unwavering, and we stay vigilant in enhancing technological protective measures as needed to maintain the integrity of our services, protect the communities we join and adhere to the law.

We encourage everyone to review the legal provisions regarding age requirements for gambling and the national ID documents that apply in their specific jurisdictions.

5. Responsible Gambling

Customer protection involves the comprehensive implementation of responsible gambling strategies. These strategies are integral to ensuring the well-being and security of our customers. They encompass a range of measures and initiatives aimed at promoting safe and responsible gaming practices, preventing gambling-related harm, and providing support to those who may be in need.

Our commitment to customer protection through responsible gambling strategies underscores our dedication to fostering a secure and enjoyable gambling environment for all. At KTO, it is recognized that the diagnosis of a mental illness can only be made by medical professionals, specifically doctors; however, we have a risk preventive approach to gambling problems. As a result, we are constantly enhancing the effectiveness of our deposit limits and loss limits controls, as well as the cooling-off periods. These measures are designed to provide our users with greater control over their gaming activities, allowing for responsible and safer gambling experiences. In addition, all our customers can contact KTO's customer service team to get guidelines on what to do if they suspect are experiencing gambling problems.

In cases where civil law procedures are to be applied to individuals with disabilities in specific jurisdictions, it is imperative to ascertain whether the respective country has both signed and ratified The Convention on the Rights of Persons with Disabilities and its

Optional Protocol. It is our responsibility to meticulously examine the domestic legal framework as well before applying legal procedures.

6. Data Privacy and Security

As our international business operations continue to grow, our reliance on the personal information of our customers becomes more pronounced in various facets of our business. While technological advancements have improved the accessibility and speed of exchanging personal information, they have also heightened the potential for its misuse. Our customers place their trust in us to safeguard the personal information, ensuring it remains protected from unintended access and disclosure. By upholding the principle of integrity, we not only validate their trust but also foster a greater willingness to share their personal information, which, in turn, allows us to deliver enhanced gambling services to our customers.

Our fair commercial practices include data privacy and security measures. We prioritize the protection of personal information, ensuring compliance with data protection regulations and demonstrating our commitment to the responsible handling of customer data. However, it is important to stress once more time that our operation nature imposes challenges regarding privacy as there is no golden rule for this field of the law, therefore, we are obliged to conduct a thorough examination of domestic legislation to ensure our compliance with sensitive matters. This includes, but is not limited to, obtaining customer consent, implementing protective measures, adhering to data subject request procedures and response times, upholding data subject rights and the mechanisms for their exercise, assessing countries with an adequate level of data protection, and overseeing data transfers.

7. Supplier and Partner Relationships

Fair commercial practices extend beyond our immediate transactions to include our relationships with suppliers and partners. We promote fair and ethical conduct throughout our supply chain, emphasizing responsible sourcing, and collaborative partnerships that benefit all parties involved from negotiation.

8. Continuous Improvement and Compliance

Recognizing that the business landscape is dynamic, we are committed to continuous improvement in our fair commercial practices. Regular assessments, compliance reviews, and feedback mechanisms are in place to ensure that our business operations align with evolving ethical standards and legal requirements.

9. Same rules for all our Customers

At KTO we empower everyone to know the odds and make informed decisions. This goal cannot be achieved unless we create an environment in which all our customers have access to the same information.

By ensuring access to information, we create a playing field where individuals, regardless of background or status, have the tools to make choices based on the facts.

Banning employees, and contractors (and their relatives for Brazil) from engaging in gambling personal activities on KTO's website is a crucial step in achieving this goal. By enforcing this restriction, we aim to provide the same rules for all our customers, mitigate the risk of misuse of privileged information and uphold the integrity core value in our company.

Restricting access to the platform also ensures that employees are not engaging in activities that could compromise the organization's security. This provision does not apply for operation testing accounts as these accounts do not belong to individuals but to the company. This provision reinforces our commitment to creating a secure and trustworthy workplace, contributing to the overall resilience and success of our company.

At KTO, fair commercial practices are not just a set of guidelines; they reflect our commitment to responsible business conduct.

SUSTAINABILITY

KTO's environmental impacts

Scope

Climate change refers to the substantial alteration of typical weather patterns over an extended period, spanning several decades or more. This enduring shift differentiates climate change from the natural fluctuations in weather.

In a world facing pressing environmental issues like climate change, biodiversity loss, and resource depletion, companies have a crucial role in shaping the future of our planet. KTO advocates for a precautionary approach, our methodology emphasizes the need to anticipate and compensate, taking preventive and corrective measures.

1. Sustainable Business Practices: our precautionary approach

KTO promotes practices that minimize the negative impact of the company on the environment. By implementing eco-friendly initiatives and compensating emissions, KTO helps to mitigate environmental harm.

KTO operation is limited to online services; however, the company recognizes that operating digitally does not necessarily mean that the environmental impact is reduced. It's crucial to acknowledge that while digital processes may offer various efficiencies and benefits, they don't automatically equate to a diminished carbon footprint.

The carbon footprint of a laptop encompasses the total amount of greenhouse gas emissions generated throughout its entire lifecycle, including the extraction of raw materials, manufacturing, transportation, use, and disposal. This footprint is influenced by various factors, such as the materials used, manufacturing processes, and energy efficiency.

Calculating the precise carbon footprint of a computer lifecycle can be complex and may vary depending on the specific components and manufacturing methods involved. However, in order to sensitize our stakeholders about the importance of sustainability,

KTO has conducted some research to get data about the two most popular laptops brands used in our company.

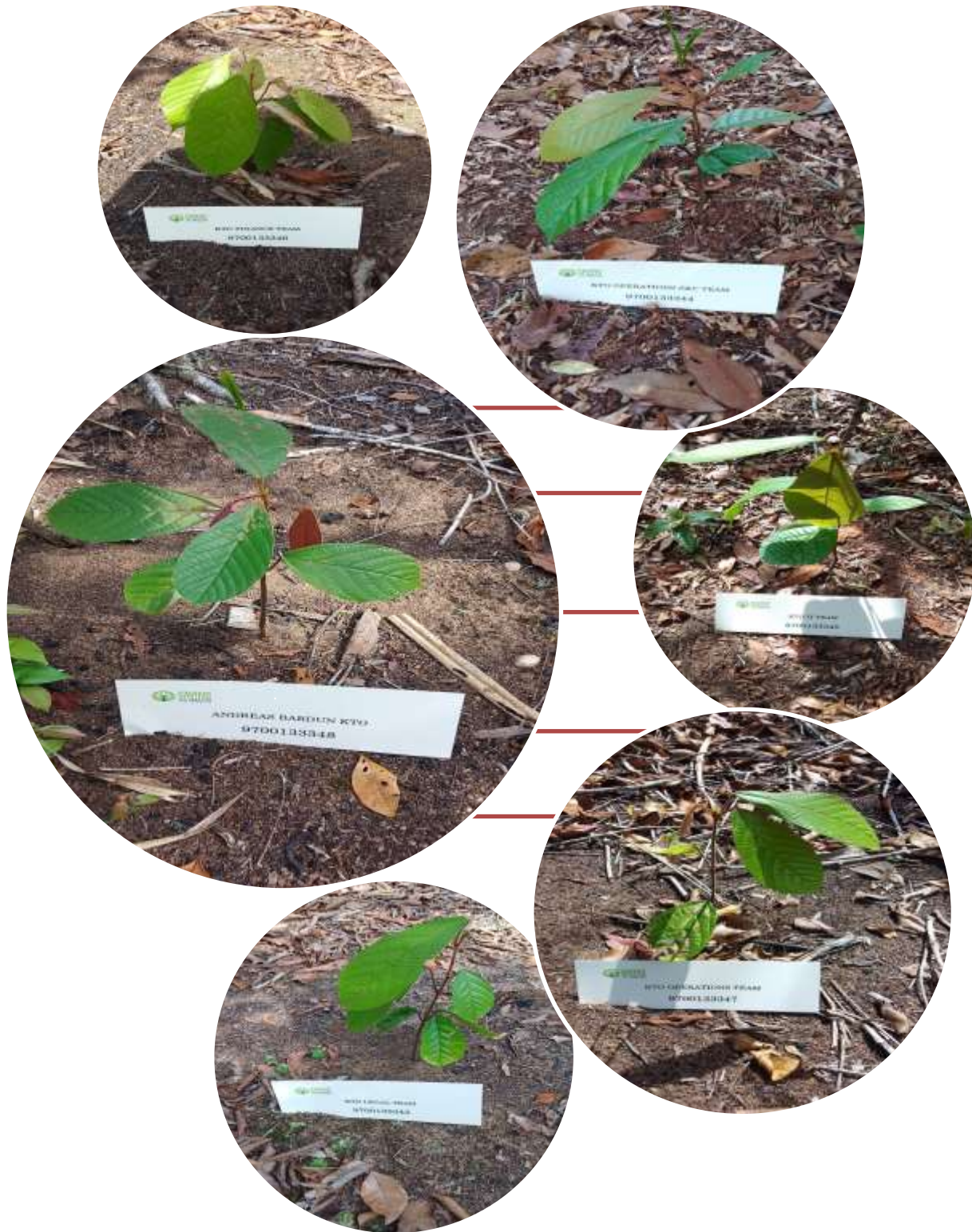
According to The Carbon Footprint of a Typical Business Laptop From Dell report¹, the total carbon emissions associated with the lifecycle of a Dell Latitude E6400 in the United States is approximately 350 kg of CO₂ equivalent. While there may be variations in these figures depending on the geographic region, the differences are relatively minor. In Europe, the carbon footprint of the same laptop in use is roughly 320 kg of CO₂ equivalent, and in China, it stands at approximately 370 kg of CO₂ equivalent. Likewise, the Product Environmental Report from Apple, states that a 14-inch MacBook Pro emits 271 kg of carbon emissions throughout its lifecycle².

Given that the average carbon footprint of an email is 0.3g CO₂ equivalent, and considering the emissions associated with both homeworking and office working, in alignment with our core value of integrity, it appears essential for us to take steps to offset our carbon footprint.

Although addressing the climate crisis certainly demands a comprehensive strategy, in 2023 we started planting trees in the amazon forest to materialize our sustainability initiatives. Each team of our company currently have their own tree in the Colombian amazon forest.

¹ Stutz, M. (2010, May) The Carbon Footprint of a Typical Business Laptop From Dell
<https://i.dell.com/sites/content/corporate/corp-comm/en/Documents/dell-laptop-carbon-footprint-whitepaper.pdf>

² Apple (2021, October 18) Product Environmental Report 14-inch MacBook Pro,
https://www.apple.com/environment/pdf/products/notebooks/14-inch_MacBook_Pro_PER_Oct2021.pdf



Trees engage in carbon sequestration by taking in carbon dioxide from the air and converting it into biomass through the process of photosynthesis. Fully grown trees

absorb carbon dioxide from the atmosphere while simultaneously emitting oxygen in return. We expect that our company operation can concurrently expand alongside the growth of the planted trees.

In this context, it's important to acknowledge that while we may have challenges ahead in measurement and offset validation, the overall benefits and affordability of planting trees as a climate mitigation strategy are well-supported by scientific research³. It's an encouraging approach, even as we work towards improving the precision of our measurements and favourable impact assessments.

You can visit our trees at <https://geoforest.savingtheamazon.org/>

2. Initiatives to promote environmental responsibility and long-term Sustainability among our employees and contractors.

Reducing the energy and waste environmental impact of our offices is a second target for sustainability responsibility target.

Top management has embraced a plant-based decor theme for our office spaces. This choice not only adds aesthetic appeal but also signifies our commitment to integrating nature into our work environment. The introduction of plants and greenery can have several positive impacts, such as improved air quality, reduced stress, and increased well-being among employees. It's a strategic move that aligns with our vision of creating a healthier, more vibrant workplace.

³ J. F. Bastin, Y. Finegold, C. Garcia, D. Mollicone, M. Rezende, D. Routh, C. M. Zohner, T. W. Crowther, (2019) The global tree restoration potential. Science 365, 76–79.

KTO encourages all its employees and contractors to

- turn off lights, computers, and other electronic devices when not in use.
- utilize natural light.
- adjust thermostat settings for cooling efficiency and turn off AC and light when leaving the company premises.
- reduce paper usage by printing double-sided when needed and using electronic documents.
- Reuse office supplies whenever possible to minimize waste.
- Promote transition to digital record-keeping and document sharing.
- Encourage electronic communication and signatures.
- Minimize single-use plastics and disposable items.
- Bring reusable containers for lunch.

3. Environmentally friendly technologies.

KTO advocates for the adoption of environmentally friendly techniques. Wherever feasible, the company should give preference to energy-efficient appliances and lighting, as these technologies consume less electricity, resulting in reduced energy consumption and a subsequent reduction in greenhouse gas emissions. Furthermore, when selecting an office space for rental or purchase, the company should opt for sustainable building practices. These may include the use of recycled materials, energy-efficient construction, and green roofs, all of which have the potential to substantially reduce the environmental impact of our operation. Embracing these energy-efficient technologies not only promotes sustainability but also contributes to a greener and more environmentally responsible approach to operations.

KTO HR and finance departments monitor energy efficiency by conducting energy audits and implementing energy-saving measures within our operations. Reducing overall energy consumption make it easier to meet energy targets.

KTO encourages the use of clean, renewable energy. If you have any ideas on how to improve or adopt environmentally friendly technologies, please do not hesitate to contact our Human Resources department. We welcome your suggestions and are committed to fostering a greener and more sustainable workplace.

INTEGRITY ETHICS ANTI-BRIBERY AND ANTI-CORRUPTION

KTO's behaviour

Scope

KTO is firmly committed to conducting its business in adherence to the law and strictly prohibits any instances of bribery and corruption. We encourage all our stakeholders to follow our Ethics, Anti-bribery and Anticorruption tone of ZERO TOLERANCE FOR CORRUPTION.

KTO explicitly forbids corruption and bribery attempts involving public servants, as well as any form of private bribery. This includes the act of offering, promising, authorizing, or providing anything of value to any public servant, customer, business partner, vendor or provider, or any other third party with the intention of improperly influencing or rewarding their actions related to our business operations or committing fraud.

For the purposes of this chapter, bribery is the offering, promising, giving, authorizing or accepting of any undue pecuniary or other advantage, in order to obtain or retain a business or other improper advantage, e.g. in connection with public or private procurement contract awards, regulatory permits, taxation, customs, judicial and legislative proceedings.

Bribery often includes:

- (i) kicking back a portion of an Agreement payment to government or party officials or to employees of the other Party, their close relatives, friends or business partners or

(ii) using intermediaries such as agents, subcontractors, consultants or other third parties, to channel payments to government or party officials, or to employees of the other contracting Party, their relatives, friends or business partners.

Extortion or Solicitation is the demanding of a bribe, whether or not coupled with a threat if the demand is refused. KTO employees and contractors will oppose any attempt of Extortion or Solicitation and are encouraged to report such attempts through available formal or informal KTO's reporting mechanisms.

Trading in Influence is the offering or Solicitation of an undue advantage in order to exercise an improper, real, or supposed influence with a view of obtaining an undue advantage from a public servant.

Laundering the proceeds of the Corrupt Practices mentioned above is concealing or disguising the illicit origin, source, location, disposition, movement or ownership of property, knowing that such property is the proceeds of crime.

"Corruption" or "Corrupt Practice(s)", as used in this chapter, shall include Bribery, Extortion or Solicitation, Trading in Influence and Laundering the proceeds of these practices.

1. Risk mitigation approach for gifts, hospitality, entertainment, donations, and political contributions

KTO is firmly committed to conducting risk management to address corruption and bribery risks effectively. As part of risk identification, KTO recognizes that gifts, hospitality, entertainment, donations, and political contributions can be exploited as a means to offer bribes or engage in corrupt activities. The use of seemingly legitimate gestures to mask corrupt intentions is entirely prohibited. To prevent such misconduct, KTO has established regulations governing the how, when, where, and why of giving gifts, hospitality, entertainment, donations, and political contributions. This framework ensures transparency and accountability in these practices, safeguarding KTO's integrity and ethical standards.

Should you have any inquiries about this Policy or seek information on applicable Anti-Bribery and Anti-Corruption laws, please reach out to the Company's Legal Counsel.

2. Risk mitigation approach for Lobbying

Lobbying is a term used to describe any form of communication, whether direct or indirect, between an individual and a public servant. This communication is aimed at being included among the factors considered in making a public decision in some way. While lobbying can have a positive impact on government decisions by promoting the disclosure of information of public interest and stimulating democratic processes; when the process lacks clarity and transparency standards are not adequately enforced, it can also lead to bribery and unfair advantages in favour of specific interests.

Before engaging in any communication with a public servant, it's essential to examine the local law and consider whether there are lobbyists appointed by a regulatory body who can ensure ethical standards. You are requested to conduct Due Diligence on lobbyists as they are contractors.

Whenever you have the opportunity to interact with a public servant your actions should always be guided by ethical principles. It's crucial to have a comprehensive understanding of the behaviours classified as corrupt in the jurisdiction you are and maintain a well-organized and transparent record of your lobbying activities. This log should be easily accessible for third-party review. Keep in mind that all lobbying activities must be conducted with transparency, integrity, honesty, and responsibility.

3. Whistle Blower Protection

The Company recognizes the importance of safeguarding whistleblowers as a detective risk control; therefore, KTO attaches great importance to provide secure and confidential means for employees and stakeholders to report unethical and corrupt behaviour.

For this purpose, KTO has established a safe reporting email at whistleblowerhelp@kto.com. Likewise, our commitment extends to thoroughly conducting a process to investigate and address each fact reported. We recognize this channel as crucial in maintaining integrity and fostering a culture of accountability within our organization according to our fair play core value.

4. Conflicts of Interest

A conflict of interest arises when an individual's personal interests potentially disrupt, or even create the appearance of disruption, with the overall interests of KTO.

Conflicts of interest can undermine individual's abilities to remain impartial and exercise sound judgment while fulfilling their duties and responsibilities. Recognizing and openly acknowledging these situations is crucial. KTO shall take proactive measures to prevent and mitigate conflict of interest.

Conflicts of interest typically occurs when an employee, manager, head, officer, or director takes actions or has personal interests that could hinder their ability to perform their duties for the Company objectively and effectively. For instance, this can happen when employees are tasked with selecting service providers objectively but instead disregard objective criteria such as quotes, financial capacity, organizational capacity or experience in the market and opt for a relative or a close friend who does not meet the expertise that KTO is looking for. Conflicts of interest can also occur if an employee, manager, head, officer, or director (or their relatives) receive inappropriate personal benefits due to their position within the Company.

Additionally, it's crucial to note that family members should not be part of the same reporting structures unless authorized by the CEO. In cases where there is a superior-subordinate reporting structure, individuals should avoid romantic relationships to prevent potential conflicts of interest. It is of utmost importance that any conflicts of interest, regardless of their scope or apparent importance, are reported promptly to ensure transparency and maintain the integrity of our organization.

It's of paramount importance to stress that not every situation in which an employee recommends a friend as a contractor automatically signifies a conflict of interest. What remains crucial in these circumstances is the duty to disclose the relationship and follow clear, objective criteria established by the Top Management, for the assessment of potential providers. By doing so, the organization can ensure transparency, fairness, and the avoidance of potential conflicts while making informed choices regarding contractors, providers, vendors, or even new employees.

Determining whether a conflict of interest exists or will arise can sometimes be unclear; if you have doubts do not hesitate to contact your supervisor or the legal team.

Individuals who are not directors, officers or heads and have concerns about potential conflicts of interest or become aware of actual or potential conflicts should discuss the matter with their supervisor. A supervisor cannot authorize or approve conflict of interest matters or make determinations regarding problematic conflicts without first presenting a written description of the situation with possible solutions to the top management. If the supervisor is involved in the potential or actual conflict, the matter should be discussed directly with the top management.

Directors or top management members, officers, or heads that become aware of actual or potential conflicts are required to seek determinations and approvals from the Shareholders meeting.

5. Disciplinary sanctions

Violation of this chapter and the Ethics, Anti-Bribery and Anti-Corruption tone from the top trigger disciplinary actions, which after conducting the investigation and defence procedures, may lead to termination of employment agreements or rendering of services contracts. It is, therefore, of utmost importance that you not only understand the significance of this chapter but also fully comply with it in your day-to-day responsibilities.

6. Anti-corruption initiatives for betting integrity

We acknowledge that criminals can employ various methods to engage in corrupt activities. Our commitment for preventing criminals from exploiting our company and the gambling industry to commit fraud is the reason why the company has chosen to manage the risk arising from lack of integrity when betting, in order to make this process easier the company decided to become a member of integrity associations.

KTO is proud to be part of the International Betting Integrity Association (IBIA hereinafter). IBIA has a Monitoring & Alert Platform that is a highly effective anti-corruption tool. This platform detects and reports suspicious activity on IBIA members' betting markets. IBIA has longstanding information sharing partnerships with leading sports bodies including FIFA, UEFA, ITIA and the IOC and many gambling regulators to utilize this data and prosecute corruption.

ANTI-MONEY LAUNDERING ANTI- FINANCING OF TERRORISM AND ANTI- FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION

KTO's behaviour

Scope

Money laundering is a process through which individuals or entities attempt to make illegally obtained funds, often referred to as "dirty money," appear legitimate or "clean." This illegal activity involves a series of financial transactions and activities that obscure the origins of the illegal gains, making it difficult for law enforcement and authorities to trace the money back to its criminal source.

Money laundering typically consists of three main stages:

Placement: In this stage, the illicit funds are introduced into the financial system. This can involve depositing cash into online gambling accounts, to get the money into the legitimate economy.

Layering: after converting the cash into an electronic balance, the money launderers create a complex web of transactions and financial activities to distance the funds from their source. They may move money between various accounts, conduct multiple transfers, or engage in international transactions to make it difficult to trace the money's origins.

Integration: In the final stage, the "cleaned" funds are reintroduced into the legitimate economy. This can involve investing in legal businesses, purchasing assets like real estate, or using the funds for personal expenditures. At this point, the money appears to be legitimate and free from any association with criminal activities.

Financing of terrorism refers to the process of providing financial support to terrorist organizations, individuals, or activities in order to facilitate acts of terrorism. This support can come in various forms, including the provision of funds, resources, assets, or even logistical assistance. The primary purpose of financing of terrorism is to enable terrorists to carry out their activities, such as planning and executing acts of violence, with the goal of promoting a particular ideology, destabilizing governments, or causing fear and terror in society. Money laundering techniques are frequently employed to obscure the source of funds and make them appear legitimate. Terrorist financiers often use money laundering to evade detection by authorities.

The financing of the proliferation of weapons of mass destruction refers to the financial support provided to individuals, organizations, or states involved in the development, acquisition, or dissemination of weapons of mass destruction. Weapons of mass destruction include nuclear, chemical, biological, and, in some cases, radiological weapons that have the potential to cause significant destruction, casualties, and harm on a large scale. Proliferation financing can take various forms and plays a crucial role in enabling the spread of these dangerous weapons. Money laundering methods are also commonly utilized to conceal the origin of funds used for financing of the proliferation of weapons of mass destruction and give them an appearance of legitimacy.

Unscrupulous individuals use legal gambling operations to introduce illegal money into the economic systems. Money laundering is a serious criminal offense in many jurisdictions, and authorities use a variety of tools, laws, and regulations to detect and combat it. KTO helps to disrupt the process and prevent criminals from enjoying the profits of their illegal activities by implementing an Anti-Money Laundering (AML), Countering the Financing of Terrorism (CFT), and Countering the Financing of Proliferation of Weapons of Mass Destruction (FPWMD) program.

KTO implements Anti-Money Laundering (AML), Countering the Financing of Terrorism (CFT), and Countering the Financing of Proliferation of Weapons of Mass Destruction (FPWMD) program to help identify suspicious transactions.

1. Assessing risks & applying a risk-based approach

Assessing risks and applying a risk-based approach for money laundering is a critical component of our Anti-Money Laundering (AML), Countering the Financing of Terrorism (CFT), and Countering the Financing of Proliferation of Weapons of Mass Destruction (FPWMD) efforts. It involves a systematic evaluation of the risks associated with ML/FT/FPWMD and the implementation of measures that are commensurate with these risks. For more information, please consult our AML/CFT/ FPWMD Policy.

2. Controls: Customer due diligence and record keeping

Due diligence entails identifying, as well as conducting background checks and other screenings on customers and counterparties to ensure they undergo appropriate risk assessment before entering into a commercial relationship. KTO is required to perform due diligence on its customers, transactions, and business relationships to ensure compliance with AML/CFT/CFPWMD regulations.

The main objective of due diligence is to obtain detailed and accurate information on all relevant aspects of a specific situation in order to make informed decisions and mitigate risks.

KTO does not maintain accounts that are anonymous or held in manifestly fictitious names.

KTO carries out customer due diligence (CDD) either by a standard procedure or enhanced due diligence under the following circumstances:

- (i) when establishing a business relationship (always);
- (ii) for occasional transactions that exceed the designated threshold according to the jurisdiction (enhanced due diligence)
- (iii) when there is a suspicion of money laundering or terrorist financing i.g. when using anonymous payment tools; or
- (iv) when KTO harbours doubts about the accuracy or adequacy of previously obtained customer identification data. It is essential that the legal framework explicitly enforces the principle that gambling services providers are obliged to conduct CDD. Each country has the autonomy to decide how it enforces specific CDD requirements, whether through legal provisions or enforceable mechanisms.

The CDD measures to be undertaken encompass the following steps: (a) Identifying the customer and verifying their identity using credible, independent source documents, data, or information. (b) Identifying the beneficial owner and taking reasonable steps to confirm their identity to ensure that the financial institution can ascertain who the beneficial owner is. In the case of legal entities and arrangements, this should involve the financial institution comprehending the ownership and control structure of the customer. (c) Gaining an understanding of, and when relevant, collecting information regarding the purpose and intended nature of the business relationship. (d) Conducting ongoing due diligence on the business relationship and examining transactions carried out throughout the duration of that relationship to ensure that they align with the institution's knowledge of the customer, their business, and risk profile, including, when necessary, the source of funds.

3. Additional measures for specific risk factors: customers

3.1 PEPs identification

A Politically Exposed Person (“PEP”) is someone who has been entrusted with a prominent public function, such as a senior political figure. Individuals who are closely related to this person for instance immediate family members and close associates are also considered

as PEPs. PEPs are classified as a money laundering risk since they may be exposed to property that has been generated by corruption and bribery because of their position.

Prominent public functions include: heads of state, heads of government, ministers and deputy or assistant ministers; members of parliament or of similar legislative bodies; members of the governing bodies of political parties; members of supreme courts, of constitutional courts or of any judicial body the decisions of which are not subject to further appeal except in exceptional circumstances; members of courts of auditors or of the boards of central banks; ambassadors, charges d'affaires and high-ranking officers in the armed forces; members of the administrative, management or supervisory bodies of State-owned enterprises; Directors, deputy directors and members of the board or equivalent function of an international organisation.

The Company must have in place appropriate risk-management systems and procedures to determine whether a player is: a politically exposed person (a "PEP"); or a family member or a known close associate of a PEP, and to manage the enhanced risks arising from the relevant person's business relationship or transactions with such a player.

4. Employee & Contractors Training

Periodical training ensures that KTO's staff is aware and compliant with the anti-money laundering regulatory requirements.

The Company ensures that employees carrying out tasks relevant to prevent ML/FT on a continuous basis, receive relevant training and information in order to fulfil the Company's obligations under the AML/CFT/ FPWMD legislation.

5. Suspicious activity report

When internal analyses classify a transaction (or set of transactions) as suspicious, the MLRO will issue a Suspicious Activity Report (SAR) to the authorities. Such report does not mean that there is a crime being committed by the client, but that there are characteristics in the transaction that make it suspicious. This process must be kept strictly confidential.

BUILDING RELATIONSHIPS WITH THE COMMUNITIES

KTO walks in our communities' shoes.

Scope

Corporate responsibility, also known as corporate social responsibility, pertains to the multifaceted influence that an organization exerts on society, the environment, and the economy. It encompasses a wide array of ethical, social, and environmental considerations, reflecting the organization's commitment to operate in a manner that not only ensures its economic viability but also contributes positively to the well-being of communities, the sustainability of the environment, and the overall health of the economy.

Corporate responsibility involves a holistic approach to business that recognizes the interdependence of the organization with its broader socio-economic context, aiming to create a harmonious and beneficial coexistence for all stakeholders.

Having previously outlined our sustainability guidelines, this section will shift its focus to our philanthropic strategies. In this chapter, we will delve into our commitment to making a positive impact on society by addressing various charitable and social initiatives. Our philanthropic responsibility underscores our belief in walking in other's shoes and giving back to the communities we serve. This chapter will explore the ways in which we contribute to the betterment of society, emphasizing our engagement in projects and endeavours aimed at fostering social well-being.

Social Impact to make the world a better place

Our passion and care & empathy core values resonate with our commitment to supporting education projects and extending assistance to victims of natural disasters. These values underscore our dedication to making a positive impact on society. They reflect our belief in the transformative power of education as a means to empower individuals and communities, equipping them with the knowledge and skills needed for a brighter future. Furthermore, walking in their shoes highlight our readiness to provide crucial aid and relief to those affected by natural disasters, recognizing the importance of solidarity and compassion in times of crisis.

In essence, our core values drive us to contribute to the betterment of the world by actively engaging in initiatives that promote education and alleviate the suffering of disaster-stricken communities and we stick with promoting this causes.

Our unwavering dedication to upholding integrity is intricately woven into the fabric of our corporate responsibility endeavours. It is of paramount importance to emphasize that all charitable contributions and donations must rigorously align with our unwavering "zero tolerance for corruption" tone from the tone and the policy on gifts and hospitality. This tone serves as the foundation of our ethical framework, ensuring that our philanthropic efforts are conducted with the utmost transparency, honesty, and integrity, thus reinforcing our commitment to responsible corporate citizenship. Additionally, the endorsement of all our corporate responsibility initiatives necessitates the approval of both our Chief Executive Officer (CEO) and Chief Financial Officer (CFO). This dual approval process underscores our commitment to ensuring that these initiatives align with our organizational tone, goals, financial considerations, and strategic vision. It reflects our dedication to responsible and transparent decision-making, as our CEO and CFO, as top leadership figures, play pivotal roles in shaping our corporate responsibility strategies and their financial feasibility.

CONFIDENTIALITY

KTO's attentive talk

Scope

Confidential information within our company is a foundation of our ability to serve customers effectively and collaborate with business partners. We uphold our competitive edge by safeguarding specific information, keeping it confidential or proprietary, and shielding it from security risks. Ensuring that this information remains undisclosed is crucial to fully leverage its effectiveness. If you have access to any of the company's confidential or sensitive information, it is imperative to handle and protect it with care. By taking these precautions, you contribute to the protection of this valuable company asset and support the company in maintaining its competitiveness.

KTO invites you to comprehend and adhere to the company's guidelines regarding the usage, sharing, and protection of confidential and proprietary information. It is your individual responsibility to ensure information security and prevent any unauthorized disclosure of company confidential data that you have access to.

Trade Secrets

Trade secrets are a type of intellectual property that encompasses confidential and proprietary information that provides a business with a competitive advantage. These secrets are not publicly disclosed and can include a wide range of information, such as processes, formulas, designs, techniques, customer's Personal Data, marketing strategies, and other valuable business information.

Trade secrets are protected by law, and KTO takes various measures to safeguard its information from unauthorized access, use, or disclosure. Unlike patents, trademarks, or copyrights, trade secrets do not require registration with a government agency. Instead, their protection relies on maintaining their secrecy and taking legal action if someone misappropriates or discloses them without authorization.

We encourage all our employees and contractors to follow all the guidelines from our IT and legal departments to protect KTO's trade secrets.

Future businesses, services, or associations

Safeguarding sensitive business information is pivotal to our success, and our stakeholders rely on us to diligently protect their data and the future projects data. The misuse of confidential information for personal gain is unauthorized. Disclosure of future projects, services, associations, or businesses can destroy a project and significantly erode the trust placed in us, this situation can tarnish both the company's and an individual's reputation.

We encourage you to be careful about what you share in social media, a careless photo or video can disclose future businesses information and give significant advantage to our competence. Always remember to shut down or suspend your work activities before taking photos or videos that you plan to upload in social media, no matter that you have a private account always be careful.

Official external communications

Official external communications refer to all the interactions, messages, and information that KTO shares with individuals, groups, or entities outside the company. These external stakeholders can include customers, suppliers, the media, government agencies, the general public, and other businesses. External communications play a critical role in shaping KTO's reputation, building relationships, and conveying its values and objectives to the broader community.

Effective and transparent official communication of our information can benefit our business interests and convey the remarkable story of our company. These disclosures allow customers and the public to better understand the value we bring to them and all our stakeholders but also promote trust, however we should be careful of not disclosing trade secrets or future projects. All official external communications must be discussed with the top management and approved by the CEO.

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