

BetIndex Limited Whistleblowing Policy

Jersey

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1. Introduction

- 1.1 In carrying out their duties, employees may, have access to, or come into contact with, information of a confidential nature. Subject to the terms of this policy as stated below, every employee's terms and conditions of employment provide that except in the proper performance of their duties, employees are forbidden from disclosing, or making use of in any form whatsoever, such confidential information.
- 1.2 The law allows employees to make a 'protected disclosure' of certain information. In order to be 'protected', a disclosure must relate to a specific subject matter (clause 2) and the disclosure must also be made in an appropriate way (clause 3).
- 1.3 BetIndex Limited is committed to being compliant with all law and regulation concerning such matters, including, inter alia, the Corruption (Jersey) Law 2006 and the Bribery Act 2010 (UK) and anti money laundering law and regulation and health and safety law and regulation.
- 1.4 The Company actively encourages a culture of honesty and openness and therefore all employees are required to bring to their manager or other designated person's attention, any issue that in the employee's opinion might constitute bribery or corruption or a breach of any law under which the Company ordinarily operates. This 'Whistleblowing' policy extends to all laws which govern the Company's operations worldwide.

2. Specific Subject Matter

If, in the course of employment, an employee becomes aware of information which they reasonably believe tends to show one or more of the following, they must use BetIndex Limited disclosure procedure set out below:

- 2.1 That a criminal offence has been committed, is being committed or is likely to be committed.
- 2.2 That a person has failed, is failing, or is likely to fail to comply with any legal obligation to which he is subject.
- 2.3 That a miscarriage of justice that has occurred, is occurring, or is likely to occur.
- 2.4 That the health or safety of any individual has been, is being, or is likely to be, endangered.
- 2.5 That information tending to show any of the above, is being, or is likely to be, deliberately concealed.
- 2.6 That the company or any associated person has been, is being, or is likely to be receiving or offering bribes.
- 2.7 That any foreign official has been, is being, or is likely to be bribed or offered facilitation payment by the company or any associated person.

3. Disclosure Procedure

- 3.1 Information which an employee reasonably believes tends to show one or

more of the above should promptly be disclosed to the board of directors so that any appropriate action can be taken.

- 3.2 If it is inappropriate to make such a disclosure to the board of directors, the employee should speak to the Company Money Laundering Reporting Officer.
- 3.3 Employees will suffer no detriment of any sort for making such a disclosure in accordance with this procedure.
- 3.4 **Employees should be aware that failure to follow this procedure may result in the disclosure of information losing its protected status.**
- 3.5 For further guidance in relation to this matter or concerning the application of this policy generally, employees should speak in confidence to the Money Laundering Reporting Officer.