

888 HOLDINGS PLC

Group-Wide Whistle-Blowing Policy

(Last updated January 2022)

Persons to whom this policy applies

1. This policy applies to all individuals working for 888 Holdings PLC and its subsidiaries (the **Group**) at all levels and includes directors, senior managers, employees, and contractors (together, **Employees**).

Purpose of this policy

2. The Board of Directors of 888 Holdings PLC (the **Board**) has adopted this policy to ensure that Employees may, in confidence, raise genuine concerns if they have reasonable grounds for believing that possible or actual wrongdoings or omissions have or will occur by or in relation to the Group where the Employees work or has worked. Wrongdoing involves any unlawful or otherwise improper behavior and can include (a non-exhaustive list):

- (a) the commission of an unlawful act, whether criminal or civil;
- (b) failure to comply with legal obligations;
- (c) the occurrence of a miscarriage of justice;
- (d) breach of or failure to implement or comply with any approved policy of the Group, including but not limited to, the Group's Anti-Bribery and Corruption Compliance Program, AML/KYC policy, Anti-Tax Evasion Facilitation Policy, internal financial controls approved by the Group, privacy policy, Anti Modern Slavery Policy, anti-sexual harassment policy, Environmental Policy, and the Group's Employee Handbook;
- (e) unprofessional conduct or conduct not consistent with established standards of practice;
- (f) engaging in questionable accounting or auditing practices;
- (g) engaging in dangerous activity likely to cause physical harm/damage to any person/property;
- (h) failure to rectify or take reasonable steps to report a matter likely to give rise to a significant and avoidable cost or loss to the Group;
- (i) abuse of power or authority for any unauthorized or ulterior purpose; and
- (j) unfair discrimination in the course of employment or provision of services; or
- (k) the deliberate concealment of any of the above.

3. The Board aims to ensure that Employees are confident that they can report and disclose such activity (**Disclosures**) without fear of reprisals or victimisation, in the knowledge that they will

be taken seriously, and that the Disclosures will be investigated appropriately and regarded as confidential.

Persons responsible for implementation of this policy

4. The Board has overall responsibility for this policy, but has delegated day-to-day responsibility for overseeing and implementing it to the designated Compliance Officer (**CO**). Responsibility for monitoring and reviewing the operation of this policy and any recommendations for change within the organization resulting from investigations into complaints under this policy lies with the audit committee. The audit committee will devote a portion of a meeting, at least once each year, to discussing this policy, and the CO will report to the audit committee in this regard.

Reporting procedure

5. If you have any concern or suspicion of wrongdoing by a fellow Employee (including of a direct line manager, senior management or director of the Group), you should immediately contact either **your line manager, another manager in your subsidiary, the Human Resources Department or the Compliance Manager**, as appropriate and as you feel comfortable. Such contact may be in the form of an email, phone call or face-to-face meeting.

Should you wish to make a Disclosure not through any of the above-mentioned contacts, you can send an email to the following organizational email address that is dedicated to reporting of cases under this policy: whistleblowing@888holdings.com

In some cases, Disclosures may involve highly confidential and sensitive matters and Employees may prefer to make Disclosures anonymously. Should you wish to make a Disclosure anonymously, you may do so by filling-in the Whistleblowing Reporting Form located on the Company's website, at the following link: <https://corporate.888.com/in-society/>. While it is at the Employee's sole discretion whether or not to make an anonymous Disclosure, it is emphasized that anonymous reporting will make it more difficult for the CO to obtain further information from the Employee, give that Employee feedback or ascertain whether the Disclosure was made in good faith. Thus, while the option for anonymous reporting is provided for by the Group, it often is more practical for the Employee to reveal his/her identity to the CO and allow for measures to be taken to preserve the confidentiality of the Employee.

6. A Disclosure made to the CO should be done orally or in writing, stating that the Employee is relying on this policy and, where the Employee decides not to use the anonymous Disclosure option as per Section 5 above, the Employee shall specify whether he/she wishes his/her identity to remain confidential. Employees should not speak to any third party about their Disclosure without first consulting the CO (subject to the provisions of paragraph 7). Oral Disclosures must be documented with a recording at the conversation or the meeting with consent from the Employee, or with a transcript of the conversation or meeting which the Employee can verify, rectify, and accept by signing. In addition, the CO may ask the Employee to formalize his/her Disclosure in writing, to include electronic mail, either before or after their first discussion. The CO will acknowledge receipt of the Disclosure and will keep a record of further action taken.

7. Employees are entitled to be accompanied by a workplace colleague at any such meeting with the CO. The companion will be asked to respect the confidentiality of the Disclosure and any subsequent investigation.

8. Regarding confidentiality, the CO will, considering the circumstances and applicable law, honour the Employee's wishes concerning confidentiality and keep such information contained to as limited number of people as required in order to handle and investigate the specific Disclosure. In more severe situations described in a Disclosure, this may require additional or more senior personnel to be involved; however, this must be determined on a case-by-case basis and taking into

consideration, where applicable, anonymity aspects of the respective case. Notwithstanding the above, in instances when the Group is under a legal obligation to report a whistleblowing incident, this will be specifically disclosed to the Employee who has made the Disclosure, before doing so, subject to and in accordance with applicable Law.

Investigative procedure

9. The Board is committed to the investigation of Disclosures fully, fairly, quickly and, confidentially. Following submission of a formal written Disclosure, the CO will acknowledge receipt within five working days and will make appropriate arrangements for investigation.

10. The length and scope of the investigation will depend on the subject matter of the Disclosure. In most instances, an initial assessment of the Disclosure will be carried out (e.g. by the CO or Human Resources Department) to determine whether or not there are grounds for a more detailed investigation to take place (including potentially by involving additional internal personnel). In all cases, the CO will aim to deal with all Disclosures in a timely manner and with due regard to the rights of all individuals involved and in accordance with the requirements of applicable Law, and a report will be produced and copies will be provided to the Audit Committee. Employees who are dissatisfied with the investigation or its conclusion should contact the CO as outlined under paragraph 16.

11. In very serious cases, following the Audit Committee's recommendation to the Board (either during or following relevant internal company investigations), and generally following consultation with external legal counsel, the Board may decide that the specific matter cannot be dealt with internally and notification must be made to external authorities. Subject to the requirements of applicable Law, relevant Employees will be informed if a referral to an external authority is about to take place. Only in very specific instances will such a referral be made without the knowledge of the Employee who has made the original Disclosure (or other relevant Employees if relevant), if such disclosure (a) could potentially disrupt or compromise the external investigation; or (b) is prohibited pursuant to applicable law and regulations.

Confidentiality

12. As noted, the identity of the Employee who has made a Disclosure will be kept confidential. In addition, the identity and all relevant information of the respective case will be limited to the minimal number of people required to handle and investigate the specific case. In order not to jeopardize the investigation, Employees will also be expected to keep confidential the fact that they have made a Disclosure, the nature of the Disclosure and the identity of those involved. There may, however, be circumstances in which, because of the nature of the investigation or Disclosure, it will be necessary to disclose the identity of the relevant Employee. This may occur in connection with associated disciplinary or legal investigations or proceedings. If in the view of the CO such circumstances exist, the CO will make efforts to inform the relevant Employee that his/her identity is likely to be disclosed. If it is necessary for the relevant Employee to participate in an investigation, the fact that the relevant Employee made the Disclosure will, so far as is reasonably practicable, be kept confidential and all reasonable steps will be taken to protect the relevant Employee from any victimization or retaliation as a result of having made the Disclosure. In any case, to the extent permitted by applicable Law, disclosure of the identity of the relevant Employee will be limited to those persons who are authorised to receive the information, unless the Employee provide consent for making an additional disclosure.

Protection and support for Employees

13. No Employee who raises genuinely held concerns in good faith under this procedure will be dismissed or otherwise face reprisals, discrimination, or victimisation as a result of his/her Disclosure. If an Employee believes that he/she is being subjected to this behaviour within the

workplace as a result of making a Disclosure (including by one's direct line manager or other manager), he/she should inform the CO, or otherwise the Human Resources Department as relevant, immediately.

14. It is expressly noted that Employees who victimize or retaliate against others who have raised a concern or made a Disclosure in good faith, will be subject to disciplinary action – and such circumstances could be grounds for immediate termination.

15. If an investigation concludes that a Disclosure has been made maliciously, vexatiously, or in bad faith, the whistle-blower will be subject to disciplinary action.

Questions

16. Any Employee who has questions about the content or application of this policy should contact the CO by sending an email to aron.halewy@888holdings.com.

Other Policies

17. All whistle-blowing and Disclosures in relation to the Group shall be framed by this policy. Notwithstanding, if other policies provide specific guidance regarding whistle-blowing procedures, Employees should follow the relevant specific guidance provided therein.