

POLICY

Group Anti-Bribery & Corruption Policy

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1. Introduction

888WH is committed to conducting our business with honesty and ethical standards. Adopting a zero-tolerance stance towards bribery and corruption, we commit to conducting ourselves professionally, fairly, and with integrity in all our business transactions and relationships worldwide. We actively implement and enforce robust systems to counteract bribery.

Our commitment extends to upholding all laws pertinent to countering bribery and corruption. We are bound by the laws and regulations applicable to us, including, but not limited to, the UK Bribery Act 2010, the US Foreign Corrupt Practices Act 1977, and all similar laws that are relevant in the jurisdictions where we operate.

1.1 Objectives

This policy provides a coherent and consistent framework that outlines our responsibilities, as well as yours, in upholding our stance on bribery and corruption. It serves to offer information and guidance on how to recognise and address issues related to bribery and corruption.

1.2 Scope

This policy applies to all individuals working at all levels, including senior managers, directors and employees (whether permanent or temporary), consultants, contractors, agents or any other person associated with us. It applies equally to all our overseas operations as it does to those in the UK.

This policy encompasses all scenarios, activities, or situations that could lead to any actual or attempted bribery or corruption; whether direct or indirect, and involving public officials or private individuals. This policy serves to:

- ensure all Staff and Associated Persons are aware of their responsibilities relative to the avoidance, prevention and reporting of bribery and corruption;
- help enable Staff and other Associated Persons comply with anti-bribery and corruption laws;
- ensure we have adequate procedures in to prevent bribery in accordance with regulatory expectations;
- mitigate bribery risks in our operations and ensure that instances of actual or perceived bribery are appropriately identified, reported, assessed and managed; and
- promote awareness and understand the key elements of the ABAC program. Thereby, maintaining proper records of all transactions accurately and transparently within the books and records to facilitate monitoring, reporting and prevention.

1.3 Approval

This policy is a Group-wide policy (Tier 1) and is to be approved by ERSC.

1.3.1 Version Control

Version	Date	Summary of changes
0.1	30/01/2024	Initial draft
1.0	06/02/2024	Approved

1.4 Policy Review

This policy is reviewed at least annually to consider whether the policy requires updating. This could occur more frequently to factor in any material changes to best practice, regulations, or the Group’s business activities. The review of the policy will be driven by the Risk and Compliance department to ensure all relevant stakeholders are involved in the review process.

2. Definitions

ABAC	Anti-Bribery and Corruption
Advantage	Any benefit including payment, kickbacks, gifts or anything of any value (financial or otherwise). Examples included in Appendix B
Associate Person	A person who performs services for, or on behalf of 888WH
Breach	Non-compliance with applicable laws, rules, regulations and/or group policy & procedure documents
Compliance Risk	The risk of facing legal and regulatory sanctions, significant financial loss, adverse consequences for customers, markets, or society, and damage to reputation due to the Group’s failure to adhere to applicable laws, rules, regulations, and governing documents
Conflict of Interest	Occurs when an individual’s personal interests, including family, friendships, financial, or social factors, have the potential to compromise their judgment, decisions, or actions in the workplace
Public Official	Includes: (a) anyone employed by or acting on behalf of, whether on a full or part time basis, a national, regional or local government, including elected or appointed officials; (b) officer or employee of government owned or controlled company or other entity; (c) employee or agent of public international organisations (such as the United Nations, European Union, World Bank and other international development organisations); (d) officer or employee of a public or state-sponsored university or research organisation;

	(e) political parties, political party officials and candidates for public office; (f) member of a royal family; (g) anyone else acting in an official capacity for or on behalf of a government agency or entity, including persons holding a legislative, administrative or judicial post and members of the military and police.
Staff	All employees, officers and directors of 888WH, wherever located
Supporting Documents	Supporting documents consists of source documents, supportive calculations, and/or other items necessary to substantiate the accuracy and appropriateness of a record. These must be attached and available at the time a record is created for approval.
Third Parties	Suppliers, agents, brokers, representatives, consultants, contractors, distributors, lobbyists and other service providers that interact with government or private sector on behalf of us.

3. Roles and Responsibilities

Business Unit	The 1 st line of defence with primary responsibility to own and manage compliance risk associated with day-to-day operational activities
Group Compliance	The 2 nd line of defence with primary oversight of monitoring and evaluating the appropriateness of the Group's policy and procedures to identify, manage, and mitigate the risk of non-compliance with relevant laws, rules, and regulations
Group Procurement	Conducts appropriate due diligence on third parties and embed contractual provisions to comply with compliance risks
Legal	Ensure we operate within the legal framework and comply with relevant laws and regulations.
Line Manager	Responsible for compliance in their specific business unit and are primary point of contact for staff to report any non-compliance events. Ensuring that staff are aware of and adhere to the Group policy and reports concerns to the Risk and Compliance department as required.
Staff	Accountable for identifying, preventing, and reporting any occurrences of bribery (including perceived instances) to both Line Managers and the Risk and Compliance department as required.

4. Policy Content

4.1 Bribery and Corruption Prohibitions

Bribery involves providing, offering, accepting or causing the provision, offer or acceptance of a benefit (i.e., anything of value) to any person, including a Public Official. This is done with the aim of improperly influencing an act or decision to gain a business or personal advantage.

Staff are strictly prohibited from - directly or indirectly - offering, promising or giving anything of value to individuals in the public or private sector with an intent to:

- influence someone to obtain or retain business or an advantage in violation of applicable laws; or
- cause or reward improper performance of official, business or professional obligations.

The method of providing a bribe, whether directly or indirectly (e.g., through a Third Party), is irrelevant, what matters is the intention behind engaging in bribery.

Corruption is the misuse of a position of employment or trust to secure a business or personal benefit or advantage. This extends to making improper requests of Public Officials where they are asked to breach or contravene an applicable law or exceed their scope of authority.

Violations of Anti-Bribery and Corruption (ABAC) laws may result in severe civil and criminal penalties for both individuals and associates. These penalties encompass fines and, for associates, potential lengthy jail terms. In addition, violation of the applicable ABAC laws or this ABAC Policy can lead to disciplinary action, up to and including termination of employment.

4.2 Business Courtesies

The Group's **Anti-Bribery and Corruption Procedure** sets out guidelines for gifts or entertainment and prohibits staff from offering or accepting gifts and entertainment that are intended to, or may, improperly influence them or others, or could be perceived as such influence.

The exchange of gifts or entertainment should not result in any actual or perceived conflict of interest or pose a risk of actual or potential reputational damage to the organisation's reputation. Therefore, prior to extending or accepting any business courtesy, careful consideration must be given to its appropriateness, adhering to the specified requirements outlined below:

- must be permissible under all applicable laws or regulations, including internal rules or policies of the recipient's organisation or agency - meaning both the provider and recipient must be allowed to engage in the offered transaction.
- must be presented, offered, or accepted for a legitimate business purpose.
- must not be too frequent when combined with all other business courtesies extended to a particular recipient or accepted by you over the course of last twelve months.

- must be conducted openly, without concealment from the recipient's superiors or others; and must not be lavish or extravagant.
- cash or any equivalent forms of currency are strictly prohibited.

4.3 Prohibitions on payments to Public Officials

Facilitation payments, also known as *'back-handers'* or *'grease payments'*, refer to small, unofficial payments made to a Public Official to expedite or ensure the performance of routine government actions or services, such as the issuance of licenses or processing applications.

Staff are strictly prohibited from making facilitation payments, even if they are legal or customary in a specific jurisdiction. These payments constitute a form of bribery and must not be offered, promised, paid, or authorized by anyone representing 888WH.

In exceptional situations, staff may deem it necessary to make a payment to a Public Official as a Health and Safety measure to counter a credible threat of physical harm or unlawful detention. This is not considered a bribe, provided that the staff involved genuinely believe the threat to be imminent, serious, and credible. Minor delays or personal inconveniences do not justify such payments.

Any such payment must be promptly reported to the Risk and Compliance department, accompanied by an accurate written record detailing the reason for the payment, the person making the demand, the amount demanded and paid, the date and location of the demand/payment, and any other pertinent facts. This reporting ensures appropriate actions are taken to prevent recurrence.

Furthermore, the hiring or retention of any public official, close relative of a public official, or business associate of a public official requires advance written approval from the Risk and Compliance department.

4.4 Third Parties

Engagement with third parties can represent a significant risk of corruption because the Group has little control over the third party's actions but essentially, can be held liable for bribes paid by them. It is therefore essential that the Group knows the background of the third parties it engages with to minimise the risk of engaging with a corrupt third party.

We categorically forbid bribery carried out by or through third parties. ABAC concerns often surface in connection with procurement activities across numerous countries within our operational scope. Key areas of procurement risk include:

- tendering entities offering business courtesies, accompanied by bribes or kickbacks to secure contract awards;
- illicit acquisition of commercially sensitive information, including tender specifications; and/or
- attempts to influence tender specifications or manipulate the procurement processes.

As a result, when dealing with third parties it is essential to:

- conduct risk-based due diligence prior to engaging any new third party, before the commencement of services, and before making any payments;
- put in place regular monitoring which must be implemented to assess ongoing risks to our business;
- ensure that third parties are engaged for legitimate business purposes and under commercially reasonable terms; and
- ensure there are anti-bribery and corruption provisions in contracts and master agreements.

4.5 Charitable and Political Contributions

We endorse various charitable causes and strategic grants. Staff must take reasonable steps to avoid giving or accepting donations that could improperly influence them, others, or be perceived as such influence. In all instances of charitable contributions, both staff and business units must adhere to the guidelines outlined in the Anti-Bribery and Corruption Procedure.

Rarely do we contribute to political parties, and any such donations are consistently disclosed publicly. These contributions are never intended to influence decisions or gain a business advantage. Any political contributions must be coordinated through the Group Risk department.

4.6 Sponsorships

Sponsorships aim to enhance the Group's brand among specific target groups. However, they may pose issues if perceived as connected to seeking or gaining an inappropriate advantage. To avoid such possibilities or perceptions, all sponsorship activities:

- must be accompanied by a written sponsoring agreement that includes, at a minimum, details such as the recipient, their banking information, the precise contribution amount, and the consideration the Group expects in return;
- must be justified by a legitimate business purpose;
- may only be undertaken if the contribution offered by the Group is proportionate to the consideration it receives in return; and
- shall not involve any payment in cash funds.

4.7 Record Retention

Staff must accurately document and record all expenses incurred on behalf of our organization. Concealing or misrepresenting expenditures or making unauthorised payments on our behalf is strictly prohibited. Supporting Documents must authenticate the legitimacy and accurate nature, including the value, of the transactions. Anti-Bribery and Corruption laws mandate that the Group:

- maintains detailed records that accurately reflect transactions, including the disposition (i.e. sale) of assets; and
- implement controls to ensure proper execution and recording of transactions.

No 'off-book' accounts are permitted, and no practices that could facilitate or conceal bribery or corruption are tolerated.

In addition, both a Gifts and Entertainment Log and a Conflict of Interests Log will be put in place and maintained by the Group Compliance function.

4.8 The importance of speaking up

Staff are required to comprehend and adhere to all relevant Anti-Bribery and Corruption laws and this policy. Any suspected or actual incidents of bribery, corruption, or policy breaches must be promptly reported, as outlined in sections 6.2 below. This is crucial, as failure to report suspected incidents of bribery or corruption involving Public Officials to the authorities can constitute an offense in certain jurisdictions.

Non-compliance with laws prohibiting bribery in both the public and private sectors, as well as violations of this Policy and associated procedures, may result in disciplinary measures, including termination of employment. Individuals engaged in misconduct could face imprisonment and monetary fines. Reports of potential non-compliance will be treated seriously, and necessary remedial actions will be taken.

Violating applicable Anti-Bribery and Corruption Laws may also lead to business restrictions and significant damage to our reputation.

4.9 How to report concerns

Staff must promptly report any suspected activities either to their immediate line manager or through the Whistleblowing Hotline. The Group is committed to safeguarding those who raise concerns in alignment with the **Public Interest Disclosure (Whistleblowing) Policy**.

Subject to the requirements of this policy and the Whistleblowing Policy, staff should consider the need to escalate and report incidents via the Risk incident process for activities covered by other compliance policies and procedures listed under Section 7.1 below.

Staff must adhere to those policies and may need to independently report or act in accordance with the requirements outlined in those policies.

5. Training

All staff members will receive training on relevant anti-bribery and corruption, this policy, and its associated policies and procedures.

Tailored training will be provided to higher-risk or senior staff as deemed necessary. The training programs are designed based on risk assessments, and participation and awareness levels are documented.

6. External requirements

Anti-bribery and corruption standards and regulation relevant to this policy are listed below. This list is not exhaustive, and it is essential to consult and abide by the local laws regarding bribery and corruption:

- UK Bribery Act 2010
- US Foreign Corrupt Practices Act (FCPA)
- UN Convention against Corruption (2003)
- OECD Convention on combating Bribery of foreign Public Officials (1997)

7. Internal materials

7.1 Policies and Procedures

The following policies should be consulted when reviewing this policy:

- Group Anti-Bribery and Corruption Procedure
- Group Conflict of Interest Policy
- Group Personal Data Retention Policy
- Information Classification and Handling Policy
- Public Interest Disclosure (Whistleblowing) Policy

7.2 Internal Controls

The following internal controls are in place and must be monitored in relation to this policy

- The Group Corporate Hospitality Declaration Form.
- The Group Corporate Hospitality Register.
- Declarations per business courtesy type, charitable donation and sponsorships; across all thresholds.
- Business Courtesies offered/received, to/from a public official.
- Cumulative spend per business courtesy across business units and same recipient.

8. Appendix A – Bribery Red Flags

Following is a list of possible 'Red Flags', which may arise concerns under this policy. This is not an exhaustive list but is for illustrative purpose only.

Risk including third parties:

- associated with a history of engaging in bribery or being susceptible to bribery, particularly concerning interactions with Public Officials.
- demands commissions or payment before finalising contracts or related functions involving public officials or private sector individuals. Unwilling to commit to a formal agreement or provide acknowledgement receipts for commissions received; with commissions appearing to be disproportionate in relation to the services provided
- approaches us at or near the time of a contract or procurement decision and explains that he or she has a special arrangement with a Public Official
- seeks payment for facilitating a service that would typically be a part of their routine office responsibilities,
- suggesting a willingness to overlook legal violations.
- makes upfront demands for gifts & hospitality related to ongoing or potential contractual negotiations.
- requests payments to be directed to a jurisdiction other than their usual one or not registered on their own name.
- seeks employment opportunities for their family or relatives.
- requesting to engage a specific contractor or subcontractor not typically associated with or recognized by us.

Non-specific or generic bribery risk:

- making or accepting a payment or non-monetary benefit without a defined contractual obligation.
- making or accepting any cash payment.
- above average amount of unspecified transactions using explanations such as, miscellaneous, general, other, consulting, leisure, entertainment, etc

9. Appendix B – Advantages / Red Flags

Advantages may encompass any payments, kickbacks, gifts or other financial or non-financial advantages, irrespective of value, including (but not limited to):

- cash or easily convertible items (like gift cards or prepaid cards).
- business, employment, or investment opportunities.
- discounted use of our products, free bets or enhanced odds.
- kickbacks related to sales, commissions, merger and acquisition (M&A) opportunities, or any other financial benefit beyond formal arrangements.
- Other financial or non-financial benefits.

10. Document Information

Document Details	
Document Type	Policy
Tier	1
Owner	Director Core Compliance
BU Approver	Chief Customer and Risk Officer
Risk Taxonomy – Level 1	Regulatory and Compliance
Risk Taxonomy – Level 2	Anti-Bribery and Corruption
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