

Modern Slavery Act  
Transparency  
Statement  
2024

## The Statement

### Introduction

Kambi Group plc (hereafter “Kambi”, “we” or “our”) makes this statement pursuant to Section 54 of the Modern Slavery Act 2015 on behalf of all group subsidiaries.

It sets out the steps we have taken during the financial year ending 31 December 2023 and our commitment to prevent modern slavery from taking place in our supply chain and/or in any part of our business.

### The Organisation

Kambi is a leading business-to-business supplier of premium sports betting services to licensed business-to-consumer gaming operators.

We employ over 1100 people across offices in Sweden, the United Kingdom, the Philippines, Romania, Malta, the United States, Australia and Denmark.

The principal activities of Kambi are the provision of managed sports betting services, modular sports betting services and front end solutions to licensed gambling operators as well as esports data to companies in and outside the gambling industry.

We have focused on creating a socially responsible business since day one, through our operations in regulated markets and have zero tolerance approach towards the existence of any forms of modern slavery and human trafficking in our business or throughout our supply chain.

### The Supply Chain

Our business model requires building stable, long-term relationships with our suppliers and customers.

The industry in which Kambi operates relies primarily on data inputs and technological services to provide its services. Kambi's most important input is sports event data, which it obtains from a network of providers, which operate from countries with a strong rule of law and a low risk of modern slavery and human trafficking. These entities are also operating within the sports betting ecosystem, which is a highly regulated sector, and under the scrutiny of multiple regulators across the globe. Kambi also engages suppliers of data centres, network services and hardware. In addition, our supply chain includes ancillary goods and services such as cleaning services and office supplies.

### Risk Assessment and Risk Management

Kambi has conducted an assessment regarding the risk of modern slavery and human trafficking within its operations. Given the software as a service nature of its business, the locations from which these services are provided, the nature of the suppliers Kambi engages with, and the type of customers Kambi provides its services to, the company assesses the risk of slavery and human trafficking as low.

Kambi continuously assesses the risk it faces and any substantial strategic change leading to increased risks of slavery and human trafficking will be assessed and, where appropriate, controls will be adapted to mitigate such risks.

### Our Policies in Relation to Modern Slavery

All Kambi employees and contractors are made aware of the Kambi Code of Conduct upon joining, which consists of a number of policies setting out each employee's responsibilities regarding ethics, information security, privacy, anti-bribery and corruption, insider information and conflicts of interest.

The Code of Conduct is accompanied by the Kambi Whistleblowing Policy, which encourages all employees and contractors to report any suspected wrongdoing as soon as possible by providing guidance as to how to raise such concerns and by ensuring that no employee suffers injustice as a result of reporting a suspicion that a legal breach has occurred or may take place in the future. Our Health and Safety Policy aims to create and maintain a safe and healthy working environment, by taking all reasonable steps to avoid, reduce or

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**Kambi**

control any foreseeable risk to the health and safety of any person. Kambi has solid controls in place to ensure that all employees and contractors are engaged in accordance with applicable laws. The vast majority of Kambi's employees are employed directly, without the use of third parties, so Kambi has full control over their working conditions.

Breaches of the Kambi Code of Conduct and/or any Kambi policies or procedures are handled under the disciplinary process applicable for the specific location where the employee or contractor is employed and handled according to applicable laws.

### Due Diligence

Kambi performs due diligence on its customers as part of its risk management procedures, as well as monitoring any legal and ethical risks from time to time, including those related to modern slavery. The majority of Kambi suppliers provide services from jurisdictions with a low prevalence of modern slavery and, as mentioned above, the nature of the products and services provided do not fall within the higher risk sectors. A reassessment of existing due diligence processes and practices has started in 2023 and its results will serve as basis for strengthening controls within the current financial year.

### Awareness

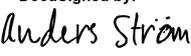
At the commencement of employment, training and documentation is provided to help employees understand the underlying principles, objectives and practical implications of the Kambi Code of Conduct.

Our company-wide learning and development programme contains an online course available to all our employees to create awareness of anti-modern slavery and human trafficking practices and give employees the tools they need to take action if they are concerned.

### Looking Ahead

As a fast-growing organisation with a growing pool of suppliers, we need to be particularly aware of any risks that may emerge in our operations and supply chain as a result of our expansion.

Over this year, our focus will be on assessing our own business operations and procurement procedures and extending the scope of our due diligence and awareness activities to ensure relevant risks are appropriately mitigated.

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**Anders Ström**

**Chairman**

**Kambi Group plc.**

**June 20<sup>th</sup>, 2024**