tipico

Prevention of Child Labor, Forced Labor & Human Trafficking

Tipico Group Limited
Tipico
Tower,
Vjal Portomaso, St. Julian's
STJ 4011, Malta

info@tipico.com
www.tipico-group.com

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CONTENTS

CONTENTS 2

1. Policy Statement 3

2. Definitions 3

3. Purpose and Commitment 4

4. Scope of Application 4

5. Guiding Standards and Frameworks 4

6. Commitment to the Ten Principles of the UN Global Compact 5

7. Prohibition of Child Labor 5

8. Prohibition of Forced Labor and Human Trafficking 5

9. Fair Wages, Working Hours, and Digital Work Protections 6

10. Non-Discrimination, Diversity, and Inclusion 6

11. Health, Safety, and Well-Being 6

12. Responsible Recruitment 6

13. Grievance Mechanisms and Whistleblowing 6

14. Monitoring, Compliance, and Enforcement 6

15. Supplier Code of Conduct 7

16. Supplier Remediation Procedure for Child Labor, Forced Labor and Human Trafficking 7

17. Review of Policy 8

Prevention of Child Labor, Forced Labor & Human Trafficking

(Including Supplier Code of Conduct, Remediation Procedures & UN Global Compact Principles)

1. Policy Statement

Tipico is committed to the highest ethical standards and ensuring that human trafficking, child labour, and forced labour have no place within our operations or supply chain. We embed this commitment into our internal practices and require the same from all our suppliers, partners, and contractors. We are committed to ensuring that our suppliers align with these expectations, and we actively support this through strong due diligence processes, ongoing monitoring, and responsible sourcing practices designed to identify and address potential risks at the earliest opportunity.

2. Definitions

Company
"Company" refers to Tipico and all its subsidiaries and controlled entities across all jurisdictions in which it operates.

United Nations (UN)
The United Nations (UN) is an international organization founded in 1945, bringing together states to promote peace, security, human rights, international cooperation, and sustainable development. The UN provides globally recognized frameworks and standards relevant to business conduct and human rights.

UN Global Compact (UNGC)
The UN Global Compact is a voluntary initiative of the United Nations calling on businesses to align their operations and strategies with Ten Principles in the areas of human rights, labor, environment, and anti-corruption.

International Labour Organization (ILO)
The International Labour Organization (ILO) is a specialized agency of the United Nations that sets international labor standards through conventions and recommendations covering fundamental principles and rights at work.

Child
A Child is any person under the age of 18 years, unless local law establishes a higher minimum age.

Child Labor
Child Labor refers to work that is:
Performed by a child below the minimum legal working age, and/or
Likely to be harmful to a child's health, safety, moral development, or education,
as defined by applicable national laws and international standards, including ILO Conventions.

Forced Labor
Forced Labor means any work or service which is exacted from a person under the threat of penalty and for which the person has not offered themselves voluntarily. This includes, but is not limited to:

- Bonded or debt labor
- Involuntary or compulsory labor
- Restriction of freedom of movement
- Retention of identity documents
- Withholding of wages to coerce continued work

Human Trafficking
Human Trafficking refers to the recruitment, transportation, transfer, harboring, or receipt of persons through the use of force, coercion, fraud, deception, abuse of power, or vulnerability, for the purpose of exploitation. Exploitation may include forced labor, slavery, debt bondage, or other forms of labor exploitation.

Modern Slavery
Modern Slavery is an umbrella term covering practices such as forced labor, human trafficking, slavery, servitude, and exploitation where individuals are unable to refuse or leave work due to threats, coercion, deception, or abuse of power.

Debt Bondage
Debt Bondage is a form of forced labor in which an individual is required to work to repay a debt or other obligation and is unable to leave the employment relationship freely until the debt is considered repaid.

Worker
A Worker refers to any individual performing work or services for or on behalf of the Company, including employees, temporary workers, agency workers, interns (where legally permitted), and remote or platform-based workers.

Supplier
A Supplier is any third party that provides goods or services to the Company, including vendors, service providers, intermediaries, recruitment agencies, consultants, and other business partners.

Value Chain
The Value Chain includes all activities and business relationships related to the Company's operations, products, and services, including suppliers, service providers, and other third parties contributing directly or indirectly to the Company's activities.

Remediation
Remediation refers to actions taken to address, correct, and prevent recurrence of identified child labor, forced labor, or human trafficking situations, with priority given to the protection of affected individuals' rights, safety, and well-being.

3. Purpose and Commitment

Tipico ("the Company") is an international Sportsbook Operator committed to conducting its business responsibly, ethically, and in full respect of internationally recognized human rights. The Company recognizes its responsibility to prevent, identify, mitigate, and remediate labor and human rights risks within its operations and throughout its value chain.

This Policy establishes the Company's commitments to:

- Prevent all forms of child labor, forced labor, and human trafficking
- Uphold fair labor standards in digital and physical workplaces
- Promote safe, inclusive, and dignified working conditions
- Set clear expectations for suppliers and business partners

This Policy applies to all Company operations in Germany, Austria, Croatia, Malta, and Gibraltar, as well as any additional jurisdictions where the Company currently operates or may operate in the future.

4. Scope of Application

This Policy applies to:

- All employees, officers, and directors of the Company
- All subsidiaries and controlled entities
- All third parties, including suppliers and other business partners

5. Guiding Standards and Frameworks

The Company's labor and human rights commitments are guided by:

- The core conventions of the International Labour Organization
- The United Nations Guiding Principles on Business and Human Rights
- The Ten Principles of the UN Global Compact
- The 17 Sustainable Development Goals of the UN
- Applicable European Union labor and human rights legislation
- National labor laws in each country of operation

Where local laws differ from this Policy, the higher standard shall apply.

6. Commitment to the Ten Principles of the UN Global Compact

The Company supports and aligns its operations, policies, and business relationships with the relevant principles of the UN Global Compact relating to human rights and labour standards, which are derived from internationally recognised frameworks and declarations on human rights and labour rights.

Human Rights

1. Businesses should support and respect the protection of internationally proclaimed human rights.
2. Businesses should ensure that they are not complicit in human rights abuses.

Labor

3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
4. Businesses should support the elimination of all forms of forced and compulsory labor.
5. Businesses should support the effective abolition of child labor.
6. Businesses should support the elimination of discrimination in respect of employment and occupation.

The Company integrates these principles into its policies, procedures, supplier expectations, and governance systems, including this Labor & Human Rights Policy and the Supplier Code of Conduct.

7. Prohibition of Child Labor

As an iGaming company operating in a strictly regulated environment, the Company does not employ individuals under the age of 18 under any circumstances.

- The minimum age for employment at the Company is 18 years, regardless of local minimum working age laws.
- Robust age verification procedures are applied during recruitment and onboarding, including for remote, platform-based, and outsourced roles.
- The Company does not engage interns, trainees, or temporary workers below the age of 18.
- The Company prohibits any form of child labor within its operations and expects suppliers, contractors, and business partners to comply with applicable minimum age laws and international standards.
- If child labor is identified within the Company's supply chain or business relationships, the Company will take immediate action in accordance with the Supplier Remediation Procedure for Child Labor, Forced Labor and Human Trafficking set out in Section 16.

8. Prohibition of Forced Labor and Human Trafficking

The Company has zero tolerance for forced labor, debt bondage, involuntary labor, slavery, or human trafficking.

- All employment must be voluntary.
- Workers must be free to terminate employment upon reasonable notice.
- Recruitment fees, deposits, or debt bondage are strictly prohibited.
- Retention of passports, identity documents, or personal property is prohibited.
- The Company prohibits any involvement in trafficking-related activities, including through digital recruitment channels or intermediaries.

9. Fair Wages, Working Hours, and Digital Work Protections

- Wages shall meet or exceed applicable legal minimums and collective agreements.
- Working hours, overtime, rest periods, and paid leave shall comply with applicable laws.
- Scheduling practices for 24/7 business operations shall prevent excessive working hours and fatigue.
- Compensation shall be paid transparently and on time.

10. Non-Discrimination, Diversity, and Inclusion

The Company prohibits discrimination, harassment, abuse, or retaliation in any form, including in remote and digital working environments. Employment decisions are based solely on merit, qualifications, performance, and business needs.
Discrimination is prohibited on the basis of **protected characteristics**, including but not limited to:

- age
- sex, gender, gender identity, or gender expression
- sexual orientation
- race, colour, nationality, ethnic or social origin
- religion, belief, or lack thereof
- disability or health status
- marital, family, pregnancy, or parental status
- political opinion or trade union membership
- any other characteristic protected under applicable law

The Company is committed to fostering an inclusive and respectful working environment where all individuals are treated with dignity and have equal opportunities to contribute and develop.

11. Health, Safety, and Well-Being

The Company is committed to providing safe and healthy working conditions, including managing ergonomic, psychosocial, and mental health risks associated with screen-based and high-intensity operational roles.

12. Responsible Recruitment

- Recruitment practices shall be ethical, transparent, and fair.
- Employment terms shall be clearly communicated in writing prior to commencement.
- Recruitment agencies and intermediaries must comply with this Policy.
- Workers shall not incur recruitment-related debt.

13. Grievance Mechanisms and Whistleblowing

The Company provides confidential, accessible, and non-retaliatory mechanisms for reporting concerns, including the Whistleblower Portal and youmatter@tipico.com for internal employees. All reports shall be handled in accordance with applicable laws and internal procedures and investigated promptly and fairly.

14. Monitoring, Compliance, and Enforcement

- The Company will conduct periodic labor and human rights risk assessments.
- Compliance may be monitored through audits, supplier assessments, or contractual controls.

15. Supplier Code of Conduct

All suppliers, contractors, and business partners must comply with the following minimum standards:

15.1 Legal Compliance

Suppliers shall comply with all applicable labor, employment, and human rights laws.

15.2 Child Labor

- Child labor is prohibited.
- Minimum age requirements must comply with local law and international standards.
- Young workers shall not perform hazardous or night work.

15.3 Forced Labor and Human Trafficking

Suppliers shall not:

- Use forced, bonded, or involuntary labor
- Retain identity documents
- Charge recruitment fees
- Engage in human trafficking or exploitation

15.4 Wages, Hours, and Working Conditions

- Wages shall meet legal requirements and be paid on time.
- Working hours and rest periods must comply with applicable laws.
- Safe, dignified, and hygienic working conditions must be provided.

15.5 Non-Discrimination and Respect

Suppliers shall maintain workplaces free from discrimination, harassment, abuse, or retaliation, including in remote or digital environments.

15.6 Freedom of Association

Suppliers shall respect freedom of association and collective bargaining rights.

15.7 Audits and Corrective Action

Suppliers must cooperate with assessments and implement corrective actions where non-compliance is identified.

16. Supplier Remediation Procedure for Child Labor, Forced Labor and Human Trafficking

Introduction

This procedure primarily applies to situations identified within the Company's supply chain, suppliers, contractors, business partners, or other third parties acting on behalf of the Company.

16.1 Identification

Potential violations may be identified through audits, supplier assessments, reports, whistleblowing mechanisms, grievance channels, or third-party assessments.

16.2 Supplier Corrective Action

Suppliers must implement corrective action plans within defined timelines. Failure to remediate identified issues may result in the suspension or termination of the business relationship.

16.3 Immediate Action

Any identified case of child labor, forced labor, or human trafficking shall be addressed immediately, with priority

given to the protection, safety, and rights of affected individuals.

16.4 Child Labor Remediation

Where child labor is identified within a supplier's operations, the Company expects the supplier to implement an appropriate remediation plan that prioritizes the child's safety, well-being, and continued access to education. Relevant authorities or guardians may be involved where appropriate.

16.5 Forced Labor and Human Trafficking Remediation

Where forced labor or human trafficking is identified within a supplier's operations, the Company expects the supplier to immediately cease such practices, protect affected individuals, return any retained identity documents, reimburse any unlawfully charged recruitment fees, and implement appropriate remediation measures.

16.6 Documentation and Follow-Up

All remediation actions shall be documented and monitored to ensure effectiveness, verify implementation, and prevent recurrence.

17. Review of Policy

This Policy will be reviewed by HR annually to ensure alignment with legal, regulatory, and international standards, including the UN Global Compact principles.