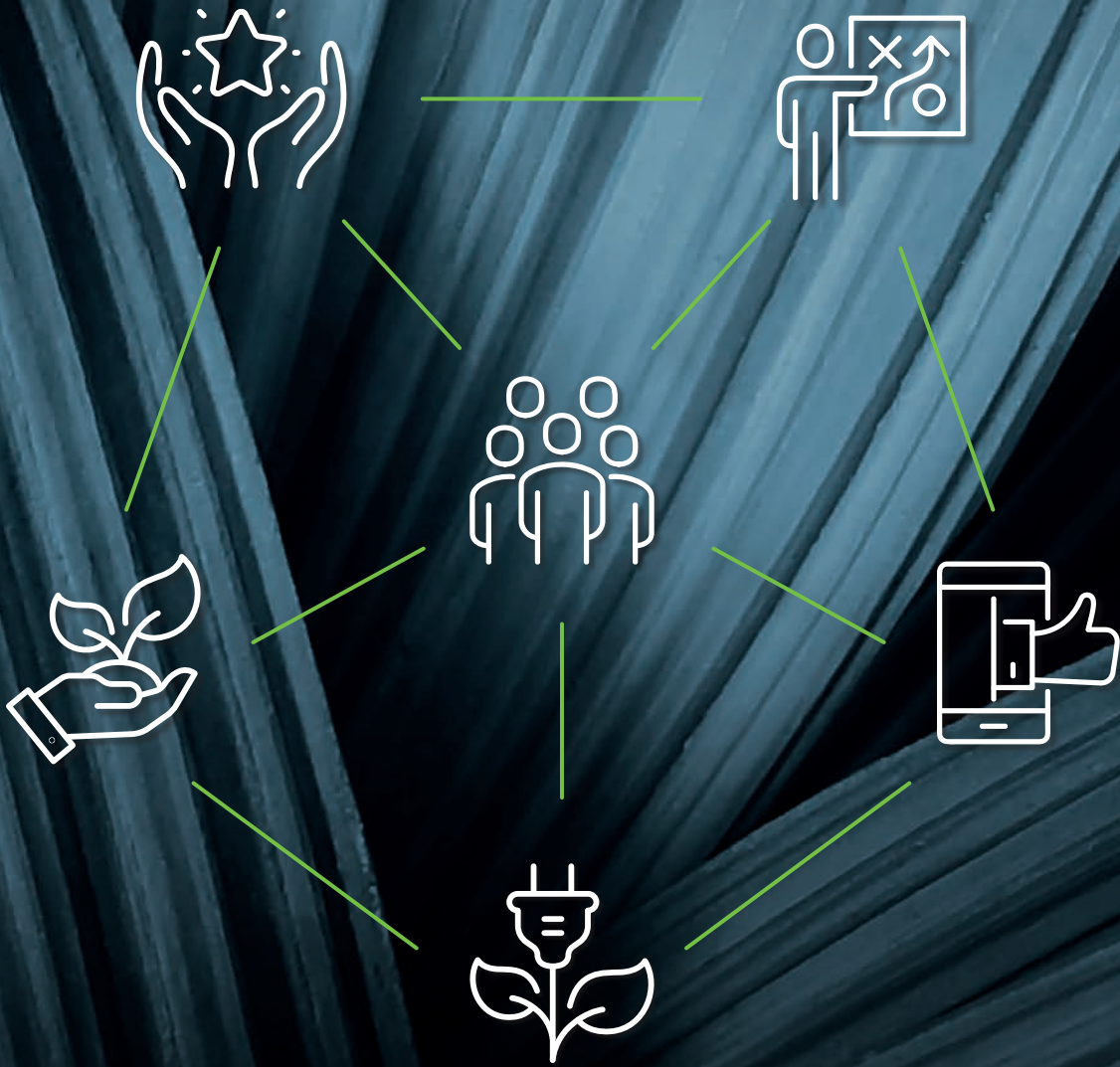


aspireGlobal

SUSTAINABILITY REPORT 2020



ASPIRE IMPACT

ABOUT THE REPORT

The 2020 sustainability report is prepared according to the GRI standards, the core option. The report is published once a year, on a standalone basis and also integrated in the annual report.

RESPONSIBILITIES

The Sustainability Committee, consisting of Tsachi Maimon (CEO), Motti Gil (CFO and Head of Responsible Gaming), Carl Klingberg (Chairman of the Board), Fredrik Burval (Member of the Board) and Liesbeth Oost (Sustainability Manager), holds regular meetings to review sustainability topics, their impacts, risks, and opportunities. The committee coordinates sustainability initiatives within the company and ensures that economic, environmental and social aspects are considered in any long-term growth initiative, in terms of focus, resources and goals.



“ Sustainability is embedded in our business strategy, which sets out targets across four focus areas aimed at the long-term well-being of all our stakeholders. Reporting is an essential part of being transparent on KPIs and the progress in limiting our potential negative impacts and maximizing our positive contribution to society.

Liesbeth Oost
Sustainability Manager

HIGHLIGHTS 2020



Strengthened our teams, knowledge and tools to become a leader in player sustainability



Environmental awareness campaigns in all offices



ISO (re) certification

COVID-19 measures: Working from home significantly reduced our carbon footprint



Opening of newly refurbished office in Ukraine



Boosted marketing compliance with Rightlander technology tool

Carbon Footprint Standard accreditation – CO2 reduced after first Full Carbon Footprint assessment of the Group



Brands participated in Safer Gambling Week UK



Integrated sustainability portfolio with BtoBet



Research collaboration on responsible gambling with Bournemouth University



Gamcare training on motivational interactions and conversations with at-risk customers

NAVIGATING CHANGE WHILE BUILDING THE FUTURE

What was the impact of COVID-19 on Aspire Global and how did the business respond?

2020 was an unprecedented year and the impacts of COVID-19 have been felt. We made sure our response was swift and that we kept the well-being of our people and players as our priority. Aspire Global is an online based company in the truest sense, and remote work and digital meetings have been well established since we began. We increased the monitoring of player activity at the start of the pandemic to detect potential harmful gambling patterns and increased the number of responsible gambling interactions.

Can you tell us what we will find in this report?

Throughout our journey to becoming the leading iGaming supplier, our business decisions have been guided by social responsibility to ensure that we remain a sustainable business, which has become increasingly important concern in our industry. Three key non-financial factors are used to measure the sustainability and societal impact of an investment in a company: Environmental, Social and Governance, or ESG. Investors are increasingly applying these factors as part of their analysis to identify material risks and growth opportunities. We are proud to demonstrate our ongoing commitment to sustainability and share our ESG impact, activities and performance for the year 2020.

How would you describe the relationship between sustainability and business performance?

First and foremost, I believe that making a quantifiable impact to protect society and planet is the right thing to do. Besides, there are multiple levels of competitive advantage that sustainable, responsible thinking gives a company. If you have sustainability in your DNA, your company is probably better equipped to comply with new regulations as they are introduced with the goal of reducing social harm. Chances are that the company that has embedded sustainability in its business strategy is better equipped technically, operationally and organizationally to meet these changing demands. Aspire Global is active in a large number of markets where we have to comply with a varying set of regulations and standards. The fact that Aspire Global has sustainability in its DNA and compliance at the heart of the business, leads to strong business performance.

And what about the relationship between sustainability and customer retention?

When we look up the word “sustain” in the dictionary, it says “cause to continue for an extended period or without interruption.” This makes you realize that sustainability is closely engrained in Customer Relationship Management – in particular Customer Retention. We want to make sure that our customers are not playing more than they’re comfortable with and are proactively encouraging responsible gambling to contribute to sustainable player behavior. Our aim is to collaborate with the industry, authorities, research institutions and nonprofits to work toward the common aim to minimize harm caused by gambling and innovate to put this in practice.

What is the outlook for Aspire Global in 2021 and beyond?

As we transition to 2021, we have been working to define the next phase of our strategy with new and stronger commitments. We are setting a direction and driving progress in four focus areas: Environment; Safe User Experience, People, and Safe Digital Environment. Combined, these areas form our impact strategy to create positive, lasting change, ensuring the well-being of all our stakeholders.

Carl Klingberg
Chairman of the Board, Aspire Global
Member of Sustainability Committee



IN THIS REPORT

DRIVING POSITIVE IMPACT

Sustainability is integrated in our business strategy through four focus areas that monitors progress and sets out targets to achieve sustainable, long-term value creation.

In 2020, we set a direction and drove progress towards four priority sustainability areas. Combined, these areas form our impact strategy, designed to enable us to create positive, lasting change, ensure the well-being of all our stakeholders, and build a sustainable business.

1.	ENVIRONMENT		ENVIRONMENTAL	p. 12
2.	SAFE USER EXPERIENCE		SOCIAL	p. 16
3.	PEOPLE		SOCIAL	p. 22
4.	SAFE DIGITAL ENVIRONMENT		GOVERNANCE	p. 28

VALUES

The gaming industry is undergoing a transformation with several markets currently being regulated. Structures are still emerging and gaming companies have an opportunity to influence future conditions together with authorities and various stakeholders, to the benefit of all parties involved.



INTEGRITY

Aspire Global has a clear focus on regulated markets, with 81% of revenues coming from taxed, regulated or soon to be regulated markets. Aspire Global is licensed and certified by a number of recognized organizations, including the UK Gambling Commission, Spelmyndigheten in Sweden, Danish Spillemyndigheden, Malta Gaming Authority and SRJ in Portugal. Obtaining, retaining and renewing licenses is a constant challenge, requiring expertise and efficient routines for quick adjustments to new or changing requirements. The platform is continuously updated with new features relating to regulation and compliance. The in-house regulation and compliance team monitors all operations, conducts ongoing training and provides partners with regulatory updates and marketing guidelines for their jurisdiction.

Compliance issues are handled by the regulatory department, which supports all relevant departments with current updates, including technical adjustments of the platform, new marketing guidelines and stricter responsible gaming requirements. The ability to swiftly and correctly respond to new market conditions is essential for Aspire Global as the formal license holder, whether B2B or B2C. Non-compliance would generate a warning from the gaming authorities, followed by fines and, in the worst case, withdrawal of the license. Maintaining a dialogue with the gaming authorities enables the company to proactively implement upcoming changes, which is a competitive strength.

INNOVATIVE TECHNOLOGY

Technology lies at the very heart of our business. Using leading technology, we are building an agile and scalable organization to ensure strong business performance across multiple jurisdictions worldwide and further develop Aspire Global's offering for iGaming operators. Aspire Global's entertainment products are offered via state-of-the-art technology, which gives us the flexibility and scalability to grow. The key is the Aspire Core Platform, an agnostic, multijurisdictional solution with multiple game providers, CRM tools

and leading payment providers. This player profile management system integrates responsible gambling tools to verify and identify end users. Aspire Core provides a stable and secure platform for operators, where other solutions can be accessed, including third party suppliers and features. We are constantly seeking ways to elevate our products and technology to be both competitive and sustainable. Our product, design and tech departments work closely together to build responsible customer-centric products.

COLLABORATION

Regulated markets with functioning structures allow professional and responsible companies to compete fairly at the expense of less serious enterprises. For the system to work and canalize the vast share of the industry, the level of control and supervision has to be reasonable. Modest structures won't have an impact, while regulations that are too strict will lead to unfair competition and lower canalization. Structures are still emerging and it will take time to find a balance, but for those companies that are active, there are great opportunities to influence future conditions together with authorities and various stakeholders, to the benefit of all parties involved. Markets that are setting their conditions look to more mature markets for inspiration, and innovative solutions can quickly become best practices.

Exerting a positive influence is the privilege of companies that act professionally and responsibly with the market's best in mind. Proactive and innovative initiatives may become best practices as regulatory structures emerge in close collaboration with the industry as a whole. Aspire Global takes an active part in various forums where authorities invite gaming companies to discuss current topics or mutual challenges. Gaming companies also have their own forums, where they can compare conditions in different jurisdictions and share knowledge and experiences, such as the iGaming European Network (IGEN), an association of leading iGaming companies based in Malta and operating in European and international markets.

STRATEGY

- OUR IMPACT FROM
PRODUCT TO PLAY



BUSINESS OVERVIEW AND MARKETS



ASPIRE GLOBAL - A LEADING IGAMING SUPPLIER

Our B2B-offering comprises of a robust technical platform, proprietary casino games, a proprietary sportsbook, and a game aggregator. The platform itself can be used exclusively or combined with a wide range of services. In addition to the B2B-offering, Aspire Global also operates several

B2C-brands, including Karamba. The Group has a broad presence in regulated markets spanning Europe, America and Africa – either through our own licenses or in countries where we have operations and our clients have obtained a license. Aspire Global is listed on Nasdaq First North Premier Growth Market under ASPIRE.

ASPIRE GLOBAL LICENSES

- Denmark
- Ireland (sports betting)
- Malta
- Portugal (platform certification)
- Sweden
- United Kingdom
- Germany (sports betting) – in process of applying

PARIPLAY LICENSES

- Gibraltar
- Malta
- New Jersey (USA)
- Romania
- United Kingdom
- West Virginia (USA)
- Pennsylvania (USA) – in process of applying
- Michigan (USA) – in process of applying

PARIPLAY GAME CERTIFICATIONS

- Bulgaria
- Colombia
- Denmark
- Isle of Man
- Italy
- Malta
- Portugal
- Romania
- Spain
- Sweden
- Switzerland
- United Kingdom

BTOBET CERTIFICATES

- GLI-19 (product and service provider)
- UK Remote Gambling and Software Technical Standards

OUR VISION

“Everything we do, we are doing to enable our partners to achieve their full potential”



CREATING VALUE FOR STAKEHOLDERS

Aspire Global shares mutual interests with a number of stakeholders. These interests are often economic and form the basis for long-term engagement. Moreover, there are stakeholders on which the company has a material impact, although indirectly, and whose perspective also needs to be considered throughout the operations.

PLAYERS / ENDUSERS

Aspire Global provides entertainment in a safe gaming environment. While being mainly a B2B company, Aspire Global has both B2B and B2C offerings that involve interactions directly with endusers through responsible customer relations, having responsible gambling at the heart of its operations.

EMPLOYEES

Aspire Global offers exciting career opportunities in a modern, flexible, stimulating and sound working environment. For a fast-growing company, maintaining and retaining talent at the required pace is a main sustainability challenge.

PARTNERS

Aspire Global's partners are operators whose brands operate on Aspire Global's platform. Aspire Global believes that long-term relationships based on mutual interests generate healthy, sustainable growth for all parties involved. Partners are mainly responsible for marketing, while Aspire Global manages everything around the platform.



SUPPLIERS

Aspire Global's main suppliers are game developers, providers of payment solutions and marketing companies. Other suppliers provide office-related services as well as legal or financial services. As with partners, Aspire Global believes that long-term relationships based on mutual interests and clear expectations generate healthy, sustainable growth for all parties involved.

SHAREHOLDERS

Aspire Global offers investors a sustainable placement based on responsible gaming and strong customer loyalty, confident in the long-term potential of the sustainable strategy. Shareholders of the company may exercise their influence and vote on matters which affect the company and its operations at the company's general meetings, investor events, or one-on-one meetings enabling a dialogue on key topics and concerns.

AUTHORITIES

Aspire Global focuses on regulated markets and actively contributes to reforming the gaming industry together with authorities and various stakeholders. The main challenge in this process is to interpret and adjust to new market conditions, subject to the licenses which form the basis for all operations. The company maintains a regular dialogue with the gaming authorities in various jurisdictions as well as related industry forums to stay in compliance and up-to-date on new requirements, including exercising potential influence over the industry as a whole.

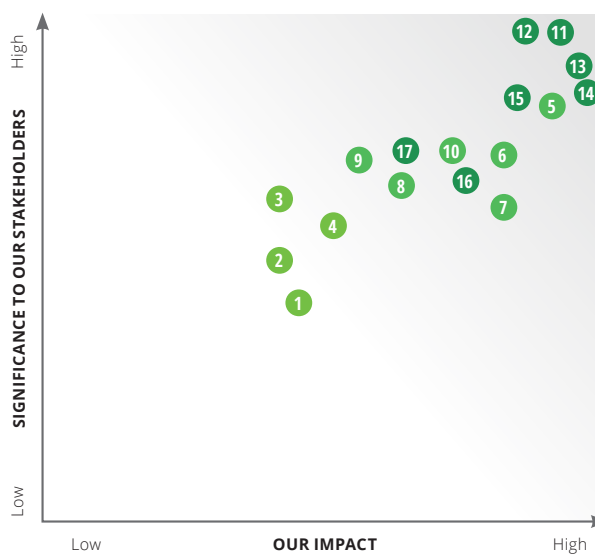
SOCIETY

Aspire Global impacts the local community in which it operates as well as global society when it comes to the environment, taxes, job opportunities and the impact from the gaming industry as a whole. Stakeholder dialogue is maintained via authorities and associations representing the interests of the public society

MATERIALITY ANALYSIS

Materiality assessments are the backbone of constructive working processes. They help to identify and prioritize key principles and focus areas and determine which initiatives that should be realized and reported. Whether an issue is considered material depends on a) impact and significance for stakeholders, b) the company's influence, c) the impact on the business in terms of growth, cost, risk or trust, and d) the alignment with the corporate mission and strategy.

The process of identifying these issues has been conducted by the sustainability committee and the Board over the past year, taking the various perspectives of stakeholders into consideration prior to any decisions. Stakeholders have been approached for input and industry benchmarks have been made before concluding the materiality analysis on the following pages.



ENVIRONMENTAL

ENVIRONMENT

Global Impact

- 1 Emissions
- 2 Waste Management
- 3 Energy Usage

Local Impact

- 4 Community Involvement

SOCIAL

SAFE USER EXPERIENCE

- 5 Responsible Gambling

Responsible Marketing

- 6 Ethical Marketing

PEOPLE

Attract and Retain Employees

- 7 Training and Development
- 8 Employee Engagement
- 9 Fair Compensation

Diversity and Inclusivity

- 10 Diversity and Inclusivity

GOVERNANCE

SAFE DIGITAL ENVIRONMENT

Information Security

- 11 Information Security
- 12 Data and Privacy Protection
- 13 Cybersecurity

AML

- 14 Anti-Money Laundering
- 15 Tax Transparency
- 16 Anti-Corruption

Reliable Suppliers

- 17 Reliable suppliers

CONNECTING SDGS

Aspire Global aligns sustainability objectives with the United Nation's Sustainable Development Goals (SDGs) and connects the appointed focus areas with six SDGs. These are the goals that we consider most relevant and material to our business.



ENVIRONMENT

Aspire Global wants to protect our planet for future generations. Together, we can make a quantifiable difference. Aspire Global has an environmental and social impact, globally and locally. Controlling this impact means being aware and minimizing any negative footprint from our operations, whether direct or indirect, and doing our best to contribute in a positive way where we are physically present and everywhere where there is an impact from the gaming industry as a whole.



GLOBAL IMPACT

- MINIMIZE ENVIRONMENTAL IMPACT

Over the past two decades, the effects of climate change have accelerated. Considerable evidence exists proving that climate change has been exacerbated by human activity. Changes in our post-industrial lifestyles have altered the chemical composition of the atmosphere, generating a build-up of greenhouse gases – primarily carbon dioxide, methane, and nitrous oxide– and raising the average global temperature. The consequences are already evident and will continue to worsen unless significant action is taken and quickly. It is vital that individuals, businesses, organizations and governments work towards the common goal of reducing greenhouse gas emissions. Aspire Global is committed to do its part and set targets to minimize the environmental impact through its operations.

Carbon Footprint Ltd has assessed the greenhouse gas (GHG) emissions of the Aspire Global Group. This Carbon Footprint Assessment is the first that Aspire Global has

completed and will enable us to minimize our environmental impact by monitoring, reducing and offsetting emissions. The company implemented a corporate environmental policy and included the relevant GRI disclosures on energy, emissions, and waste management in annual reporting.



CO₂e
Assessed
Organisation



CARBON FOOTPRINT

The first step towards minimizing our environmental impact is calculating the Group’s carbon footprint by measuring the impact our activities have on the environment in terms of the greenhouse gases produced, measured in units of carbon dioxide equivalents (CO₂e).

Aspire Global is CO₂E assessed by Carbon Footprint Ltd, which measured our greenhouse gas (GHG) emissions from January 1, 2020 to December 31, 2020 based on a dataset resulting from energy consumption and business transport activities. This is the company’s first Carbon Footprint Assessment and will therefore form the baseline year.

The COVID-19 pandemic and national restrictions enforcing strict social distancing had a positive impact on the carbon footprint in 2020, mainly due to reduced business travel, commuting, and office energy usage after remote work became the norm.

EMISSIONS FROM SITE ELECTRICITY

When it comes to minimizing the impact from infrastructure and daily operations, energy-intensive servers are the main concern. Aspire Global owns and leases server space. Our offices are modern and equipped with smart and energy-efficient devices.

EMISSIONS FROM TRAVEL

Aspire Global tries to minimize the need for travel through video conferencing. Car travel is the most common mode of commuting and accounted for the majority of the commuting emissions. Aspire Global encourages employees to carpool or where possible choose green commuting.

	2020
Total tonnes CO ₂ e	373.75
Tonnes of CO ₂ e, per employee	0.92
Tonnes of CO ₂ e, per £M turnover	2.31
Estimated Error Margin	36%

WASTE MANAGEMENT

The waste in our offices, canteens and kitchens is separated according to local recycling schemes. During 2020, Aspire Global held an environment awareness campaign for employees, to increase knowledge and engagement on reducing single-use plastics, separating waste correctly, printing less to save paper, using reusable coffee cups at the office, and energy-saving tips and tricks.

OUR CARBON MANAGEMENT JOURNEY

After first quantifying our annual emissions, we set out targets customized to Aspire Global's emissions profile, to ensure that the targets are ambitious but achievable. All targets will be reviewed in sustainability reporting and revised accordingly.

1. Set reduction targets based on intensity metrics and implement energy-saving solutions.
2. Evaluate the effectiveness of remote meetings and limited travel during COVID-19, and redefine what the business classifies as "essential" travel going forward.
3. Evaluate waste processes and encourage the implementation of the waste hierarchy to increase recycling and prevent landfill waste.
4. Offset the GHG emissions produced to achieve carbon neutrality.

Global warming is mankind's greatest challenge in the coming years and I am proud that Pariplay, via Aspire's environment program, is one of the thought leaders when it comes to what the iGaming industry can do to make sure we leave a better planet for our kids. This is not a short-term issue for management, but a long-term strategy for all employees. Let's get carbon neutral together.

– Jesper Kärbrink, Chairman Pariplay

LOCAL IMPACT

– CONTRIBUTE TO COMMUNITIES WHERE WE OPERATE

In terms of local impact, Aspire Global focuses on paying taxes, providing job opportunities, contributing to a safer gaming market and participating in local charities. Aspire Global has a minor but important environmental impact globally and in all communities with an iGaming market, whether regulated or not and whether Aspire Global operates there or not. Having a clear focus on regulated markets and contributing to a reformed gaming industry affects players everywhere in the long run. The regulation trend

is spreading from market to market, turning best practices into common practice.

Aspire Global's Corporate Social Responsibility strategy is designed to have a significant positive impact on the communities where we operate. It is executed through community engagement and a wide range of employee initiatives, which enriches and strengthens the communities where we operate through a variety of volunteering events, sponsorships and donations.

PAY TAXES AND PROVIDE JOB OPPORTUNITIES

Aspire Global is active in various countries and employs 456 people. Being an international company of significant size with geographic diversity comes with a number of responsibilities, one of which is to contribute to the communities where we operate. Taxes are a direct and transparent way to contribute to society by financing infrastructure, providing job opportunities, directly and indirectly, and stimulating sustainable economic growth and innovation. Aspire Global Group contributes to society through corporate income taxes, gaming duties, employer taxes and indirect taxes (such as VAT), and as a global employer generating employee taxes for local governments. Aspire Global hires 78 percent of its employees locally, meaning they are citizens of the country where they work

THE IGAMING EUROPEAN NETWORK

As a member of the iGaming European Network (iGEN), Aspire Global is one of 25 iGaming companies based in Malta that are giving the industry a common voice and driving positive change in the environments we operate. The Group exerts local influence through this industry group by identifying key common issues that the industry is facing, by driving actions and initiatives and by pursuing lobbying efforts.

VOLUNTEERING, SPONSORSHIPS AND DONATIONS

Employee volunteering days are held to promote community inclusion. We support charitable giving and community engagement in the areas of education, social services and cultural initiatives. This includes charitable contributions to non-profits and registered charities as well as employee engagement programs. We want to contribute in ways that demonstrate our intrinsic value to local development and progress. The name of the game is to donate our time and expertise, develop our people and build teams, all while improving our communities. Through iGEN, we donated high-quality KN-95 medical face masks to front-line health-care workers during the COVID-19 pandemic.

78%

SHARE OF TOTAL EMPLOYEES WHO ARE HIRED LOCALLY, I.E. CITIZENS OF THE COUNTRY WHERE THEY WORK

FOCUS AREAS AND PROGRESS

2020 COMMITMENT

	Progress	Info
Implement environmental strategy and policy within Aspire Global	On track	Implemented
Employee environmental awareness program	On track	Campaign focused on environmental awareness, incl. waste recycling offices, green commuting and energy-saving tips.

2021 COMMITMENT

	Towards	Aspire Impact
Implement Group corporate environmental policy and program.		Achieve carbon neutrality with reduction targets and carbon offsetting.
Evaluate waste processes and encourage the use of the waste hierarchy to increase recycling and prevent landfill waste.		

SAFER USER EXPERIENCE

Providing a safe user experience in terms of responsible gambling is Aspire Global's single most important responsibility. It is the source of long-term growth and aligns with Aspire Global's mission. The company can significantly influence the players who consume our products whether by visiting any of Aspire Global's proprietary brands or any of our partner operators. Security is also a critical issue for our partners who rely on Aspire Global's platform solution and the authorities who grant licenses to the company.



RESPONSIBLE GAMBLING

– OFFER PRODUCTS AND SERVICES THAT PROMOTE RESPONSIBLE CONSUMER BEHAVIOR

Aspire Global believes that the future lies with those companies that can generate long-term profit while promoting sustainable user behavior. This means optimizing and retaining a reasonable level of revenue from each player over a longer period of time, rather than maximizing FTDs and the level of deposits from each player in the short run.

Aspire Global has chosen to focus on regulated markets as it enables serious companies to compete on equal terms in offering a safe iGaming experience in terms of responsible gaming and create a better iGaming market for everyone: players, the people around them or anyone unintentionally exposed to the industry, such as minors or those trying to avoid playing. In the area of responsible gambling, Aspire Global promotes healthy gambling behavior and tries to proactively identify and approach players who show signs of negative gaming behavior and/or are unsatisfied with their gaming habits. To be a leader in player sustainability, the company is committed to using innovative technology based on AI and machine learning to identify player accounts that might be at risk of developing negative playing patterns. With this information, we can better target preventative actions and increase the chances of positive changes in player behavior, with the goal to minimize harm done to end users who are seeking entertainment by gambling. Aspire Global works with researchers to continuously improve and optimize our tools.

Aspire Global is both a platform provider (B2B) and an operator. As a provider of a full-service B2B solution, Aspire Global maintains an active dialogue with partners, providing them with routines, tools and support for responsible mar-

keting while managing customer support and contact with their players. Within B2C, Aspire Global provides the same customer services, including support and tools for responsible gaming, but also manages marketing activities according to the corporate policy on responsible advertising.

The management team defines the targets, prioritizes projects and allocates resources to the various departments, including Compliance, Responsible Gambling, Anti-Money Laundering, Tech, Customer Support and B2B. The Responsible Gambling team, together with the customer support department, manages all direct dialogue with players, while the B2B department handles partner relations, including updates on regulations and any necessary training. The Head of Responsible Gaming oversees the progress and reports to the Sustainability Committee of the Board.

There are well-established mechanisms in place for evaluating the effectiveness of the work. A dedicated team within Responsible Gambling manages a list of players who are considered at potential risk and monitors progress through automatically generated reports. In addition to personal limits, there are systematic limits activated at certain thresholds, limiting vulnerable accounts. When it comes to customer support, service quality is tracked in various ways: automatic surveys following chats, where a shift leader contacts the player in case of a bad review, random chat controls and mystery shoppers, where a third party conducts tests in all channels. There are quantified targets for all of the above, set per employee, shift and team leader, and which serve as the basis for evaluation.

FOCUS ON REGULATED MARKETS

Aspire Global has a clear focus on regulated markets, with 81% of revenues coming from taxed, regulated or soon to be regulated markets. Aspire Global is licensed and certified by a number of recognized organizations, including the UK Gambling Commission, Spelmyndigheten in Sweden, Danish Spillemyndigheden, Malta Gaming Authority and SRIJ in Portugal. Obtaining, retaining and renewing licenses is a constant challenge, requiring expertise and efficient routines for quick adjustments to new or revised requirements. The platform is continuously updated with new features relating to regulation

and compliance. The in-house regulation and compliance team monitors all operations, conducts ongoing training and provides partners with regulatory updates and marketing guidelines for their jurisdiction.

INVESTING IN COMPLIANCE AND SUSTAINABILITY

We continued to strengthen our operational compliance team, which consists of dedicated responsible gambling and anti-money laundering specialists who are focused on detecting at-risk players and proactively interacting with them to encourage positive playing behavior of the end user, putting them at the heart of the operation.

OUR STRATEGY FOR RESPONSIBLE GAMBLING

1. Understand gaming related harm and find lasting solutions

Collaborate with universities on research into responsible gambling.

2. Educate our employees, partners and their players

Internal and external staff training to promote responsible gaming.

3. Promote a responsible culture

Support our partners with responsible advertising, marketing and promoting safer gambling week UK.

4. Empower players to make the right choices

Roll out a framework across the business to predict triggers among at-risk players.

5. Fund treatment for gambling addiction

Continue to donate to research, education and treatment on problem gambling.

6. Be innovative in our product development

Develop our platform to have responsible measures at the forefront of player activity, making sure all player information has a clear responsible gambling audit trail and visual. Create bespoke responsible gaming tools.

7. Drive awareness within our business

Refreshed mandatory training for all staff, switch from VIP team to Loyalty and Wellbeing Team to monitor player retention in relation to responsible gaming, partnerships with suppliers to communicate more effectively with players and quickly identify signs of harmful behavior.

8. Use innovative technology like machine learning and AI to increase efficiency

Machine learning and AI technology will be an important part of responsible gaming identification process, with customized automation for each player. All rules will be configurable to suit the needs of the partner and the markets they work in.

USEFUL TOOLS FOR SELF-CONTROL

– ENCOURAGE PLAYERS TO STICK TO THEIR ORIGINAL INTENTIONS

Aspire Global offers a variety of tools to help players monitor and limit their gaming sessions and deposit levels. The general principle is that Aspire Global's iGaming services should be consumed just like any other form of entertainment – over a longer period of time, at a reasonable level and a reasonable cost. Players are encouraged to set reasonable limits upon registration and to maintain a user pattern in line with these intentions. Aspire Global is also connected to national voluntary self-exclusion services, such as Spelpaus.se in Sweden, GAMSTOP in the UK and ROFUS in Denmark, enabling players to block themselves from all iGaming platforms in the locally regulated markets.

In 2020, the company's aim was to automate as many responsible gaming services as possible, including more automatically generated reports and systemized blocking at the first sign of compulsive gaming. We want to enhance the gambling harm detection capabilities of our monitoring systems. We can do this by further analyzing research and data to encompass more indicators of harm at a much earlier point of a player's journey. We are working on ways to automate more responsible gaming interactions with players by offering support through various communication channels. This will keep customers informed on responsible gaming tools and help available.

PROACTIVE INTERACTION BY DEDICATED RESPONSIBLE GAMING TEAM

The dedicated responsible gaming team, together with the customer service department, actively identifies, monitors and approaches players who show signs of losing control or addiction. A real-time internal system has been implemented, notifying the team of players at risk through automatic alerts. This can mean players who repeatedly adjust their limits or dramatically change their user pattern, players with high deposits or losses, players who play at night or players who constantly cancel their withdrawals. A strict protocol ensures that these players are handled according to established procedures and that progress is evaluated based on relevant KPIs. Interference starts with a call and email, informing the player of recent activity, useful tools

or other assistance. If needed, the player can be limited, blocked and/or referred to professional help. All employees who interact with customers complete regular training on responsible gaming, and prior to becoming an agent in customer support, responsible gaming or AML, an assessment has to be made of the knowledge needed to provide players with relevant support. The responsible gaming department receives continuous internal and external training, including by Gamcare, the leading UK provider of information, advice and support for anyone affected by gambling harms, developing skills on motivational interactions and conversations with at-risk customers.

BUILDING PARTNERSHIPS TO ADDRESS GAMBLING-RELATED HARM

During the last year, we focused on strengthening our collaboration with higher education and charities to promote research, education and treatment (RET).

COLLABORATION WITH ACADEMIC RESEARCHERS – BOURNEMOUTH UNIVERSITY

Aspire Global aims to support academic research while simultaneously increasing our knowledge of the research findings on harm minimization and ways to improve the company's communications to increase their effectiveness vis-à-vis end users.

EroGamb II project

Aspire Global and Bournemouth University have formalized intention for Aspire Global to be an official collaborator in the Bournemouth University's EroGamb II project, contributing to this research project with anonymized

data. The project focuses on developing and evaluating the approach of sending feedback to end-users, focused on the effect of the use of different design patterns for information transparency around games in order to keep players in control.



The project is hosted by the Engineering and Social Informatics research group (ESOTICS) in the Department of Computing and Informatics and the Department of Psychology, along with input from other academic departments, funded jointly by Bournemouth University and other collaborators.

CLEAR LABELING

– FULL TRANSPARENCY ABOUT RISKS AND USEFUL STRATEGIES FOR SOUND GAMING

Clear labeling means informing new and existing players on the websites (online casino or online sportsbook) about safe use and potential risks related to iGaming: how to identify signals of gambling harm, what methods and tools are offered to prevent or slow undesirable habits and who to contact for active support. Aspire Global assesses all

new brands in terms of these aspects and labels products according to regulations. Some services are sourced from third-party suppliers; more information about partners and suppliers and the sustainable sourcing process can be found in the Safe Digital Environment chapter.

GAME CERTIFICATION

Game compliance and certification is a key tenet of the game development process for Pariplay games. Every game passes extensive internal testing and sign off and is then sent to an independent external testing lab for complete testing and certification. We work with two of the leading testing labs on the market: Games Laboratories International (GLI) and Gaming Associates (GA). They validate the various aspects of the game including visual elements, content and translations, math model and return to player (RTP) distribution, regulatory messaging, along with all relevant technical standards.

Game certification is performed on a per jurisdiction basis. We currently certify our games for 13 separate markets: UK, Malta, Isle of Man, Romania, Bulgaria, Portugal,

Spain, Sweden, Denmark, Switzerland, Colombia, Italy and New Jersey. For some markets, games pass an additional review by the local regulatory body before being approved to go live. This applies to Romania, Bulgaria, Portugal, Spain, Switzerland, Colombia, Italy and New Jersey.

Our wide portfolio of certified games allows us to grow our market share in regulated markets and diversifies the risk of being too reliant on any single market. We are able to expand geographically with our existing customers when they enter new markets, ensuring top service and speed to market. Our network of prospective customers expands with every new market we are certified for, increasing the potential market size we can capture.



SAFER GAMBLING WEEK UK

Aspire Global was an official supporter of Safer Gambling (SG) Week UK, November 19-25, showcasing responsible gambling banners and messages throughout the week on the homepage of our UK facing partners' site and B2C sites. Our participation is part of a commitment to promote a responsible culture and support players to make informed choices, so they gamble more safely and have a positive overall gaming experience.

SG Week is a campaign led by the gambling industry to drive awareness on how to gamble safely. While we provide information and assistance every day of the year, during SG Week we are even more visible to players by displaying official SG Week material (banner/image) on the website.

RESPONSIBLE MARKETING

Ethical marketing – Minimize exposure to campaigns by the wrong target groups

Ethical marketing is about advertising: phrasing, layout, frequency, target Groups, channels and location of campaigns. This applies to B2C marketing as well as B2B brands managed by partner operators. In addition to complying with local regulations and codes, Aspire Global has a strict marketing policy to avoid public exposure and minimize the influence on minors and other vulnerable groups. For instance, marketing material should not appeal to children. For this reason, the use of popular characters and personalities is forbidden. For the same reason, campaigns are not allowed to be displayed or distributed in public spaces, including public transportation. It is prohibited to insinuate that gaming can be a solution to social, educational, professional or personal problems, nor shall it be presented as an alternative to employment, a solution to financial concerns or a form of financial investment. Furthermore, gaming shall not be portrayed as socially attractive, nor should it be implied that solitary gaming is preferable to social gaming. The marketing policy is referred to in the formal contract with partners, which agree in writing to comply with the guidelines and are trained prior to launch. In addition, the compliance manager at Aspire Global checks and signs off on every campaign launched by a partner operator, to comply

with licensing conditions and codes of practice linked to the fair and open licensing objective, stating that all marketing advertising of gambling products and services is undertaken in a socially responsible manner.

MARKETING COMPLIANCE SCANNING TOOLS

Aspire Global started to use an affiliate monitoring compliance tool (Rightlander) to enable better oversight and detect publishers linking to our brands. The software scans tens of millions of pages each month and follows every link to detect how the brand is being marketed. It analyses links, text, and images, reporting potentially non-compliant content, outdated offers, incorrect marketing assets and harmful vocabulary. Regulatory changes in key markets have increased the need for an agile and easy-to-use interface that continuously monitors marketing and flags potential violations. This is done by the “Compliance Monitor” tool. In addition, the “PPC Monitor” tool identifies ads that could be harmful to the brand. One of the main tasks of the account manager and compliance manager is to actively dialogue with partners, providing them with routines, tools and support to manage marketing activities according to the company’s corporate policy for responsible marketing and advertising.

FOCUS AREAS AND PROGRESS

2020 COMMITMENT

Support academic research while simultaneously increasing our knowledge from the research findings on harm minimization.

Progress

On track

Info

Collaboration with Bournemouth University started for data sharing to contribute to responsible gambling research.

Increase specialized RG training on motivational interactions and conversations with at-risk customers.

On track

Training from Gamcare on social responsibility and interaction for employees in RG roles.

2021 COMMITMENT

Optimize player detection and risk rating tool by using machine learning to enhance identification and proactive interaction with at-risk players.

Towards



Aspire Impact

Be a leader in player sustainability by using smart technology in combination with proactive interaction to minimize any harm done to endusers that seek entertainment by gambling via our operations.

Enhance automated interactions from responsible gambling alerts to reach out to players quickly and effectively, followed up by system monitoring.



PEOPLE

Aspire Global is growing fast, which requires active recruitment and retention of talent in competition with other companies. The company has a diverse and uniquely competent workforce, indicating that professional qualifications are not being compromised in favor of other factors such as cultural background, gender or physical disabilities. As for recruitment, Aspire Global has chosen a sustainable approach, where the unique selling point is a modern, flexible, stimulating and healthy working environment that enables a work-life balance.



ATTRACT AND RETAIN EMPLOYEES

A FAST-GROWING ORGANIZATION

At the end of 2020, Aspire Global had 456 employees (an increase from 312 in 2019 and 179 in 2018) based in eight offices located in Malta, Israel, Ukraine, Bulgaria, India, Gibraltar, North Macedonia and Italy. The Maltese office is the Group's headquarters and has 141 employees mainly focused on management, operations, payments and risk, marketing and CRM, and product development, while most technology is based in Kiev, Ukraine, with 92 employees at year-end. The office in Tel Aviv, Israel, has 55 employees, focusing mainly on marketing support and frontend development services. In 2019, the game company Pariplay was acquired and integrated in the Group as a subsidiary. The team at Pariplay consists of 83 gaming experts, the majority of whom are based in Sofia, Bulgaria, where the main technology hub is located, in addition to the operations in Gibraltar, India, Israel and Malta. In 2020, Aspire Global expanded the B2B operations with the acquisition of the sportsbook provider BtoBet. The team at BtoBet consists of 93 employees, mainly based at the BtoBet headquarter in Skopje, North Macedonia, in addition to operations in Italy and Gibraltar.

In specific areas, the company uses external consultants, e.g., legal services, compliance and auditing. Third-party services related to the offering, such as payment solutions or affiliate services, are supplied by leading

companies in each field. When it comes to office-related services, such as maintenance and supplies, the company aims to hire local firms.

Aspire Global is a member of the Maltese association HR Connect, created in 2018 for senior HR decision-makers in the gaming industry. Members regularly meet to learn, network and solve practical challenges. The association also acts as the industry's voice vis-à-vis the government, educational institutions and commercial entities on all employee-related matters.

456

(312 IN 2019)

TOTAL EMPLOYEES ASPIRE GLOBAL GROUP

280

(240 in 2019)

Aspire Global

83

(72 in 2019)

Pariplay

93

(-)

BtoBet

OFFER ATTRACTIVE CAREER OPPORTUNITIES

Aspire Global offers attractive career opportunities in a sound working environment underpinned by diversity and gender equality, as well as a work-life balance. Providing exciting jobs with secure employment terms is essential to a sustainable business, and a key to continued growth.

Aspire Global is growing fast, which requires active recruitment and retention of talent in competition with other companies in the iGaming sector. Rather than with wages

alone, the company targets people with a sustainable focus on the company culture, working conditions and career opportunities, attracting people who value a modern, flexible, and stimulating working environment that enables a work-life balance.

In the annual employee survey conducted in 2020, 94% of employees said they would recommend Aspire Global as an employer of choice, 88% of the employees love the atmosphere and working at Aspire Global.

Aspire Global uses an HR management platform that helps the company to attract, stimulate and retain talent through data-driven HR tools. All employees of Aspire Global have access to the system. Furthermore, the HR team is connected to a global recruitment system that records and spreads information about open positions in the company.

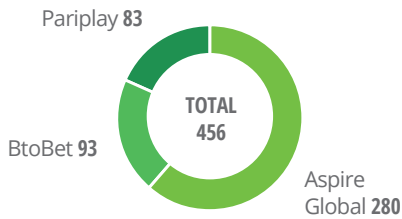
94%

of employees recommend
Aspire Global as an
Employer of Choice

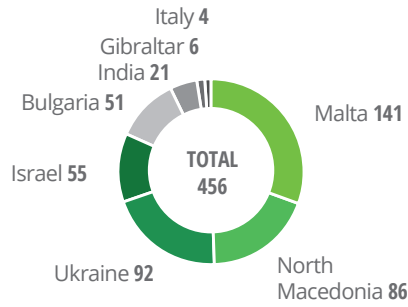
EMPLOYEE DATA

– GROWTH AND DIVERSITY

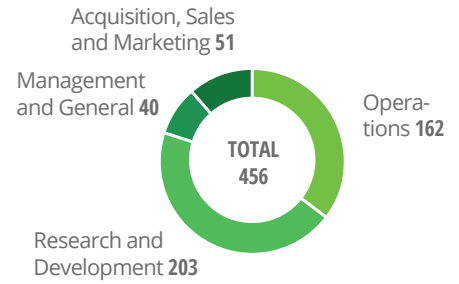
Employees per brand



Employees per office



Employees per function



SHARE OF FEMALE EMPLOYEES ASPIRE GLOBAL GROUP

Gender Diversity	2020	2019	Share of Total 2020	Share of Total 2019	Progress towards 40/60
Share of women of total employees	162 / 456	138 / 312	36%	44%	36 / 64
Share of women per Office					
Aspire Global	125 / 280	115 / 240	45%	48%	Balanced
Pariplay	17 / 83	23 / 72	20%	32%	Unbalanced
BtoBet	20 / 93	-	22%	-	-

456

TOTAL NUMBER OF EMPLOYEES OF ASPIRE GLOBAL GROUP INCLUDING 83 FROM PARIPLAY AND 90 FROM BTOBET

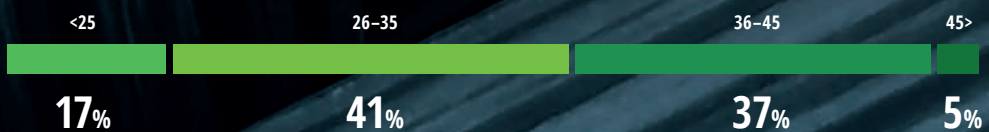
36%

SHARE OF FEMALE EMPLOYEES OF ASPIRE GLOBAL GROUP

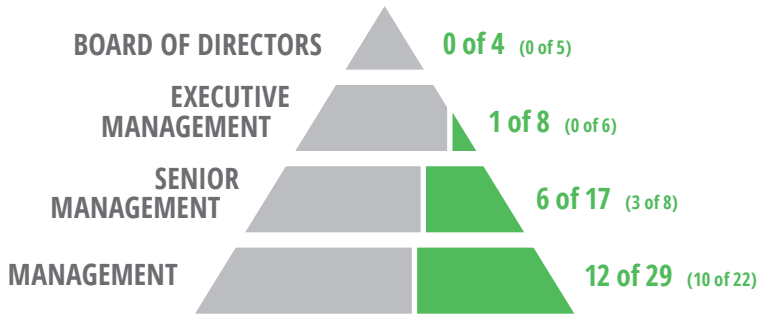
36

TOTAL NUMBER OF NATIONALITIES AT ASPIRE GLOBAL GROUP

AGE DIVERSITY

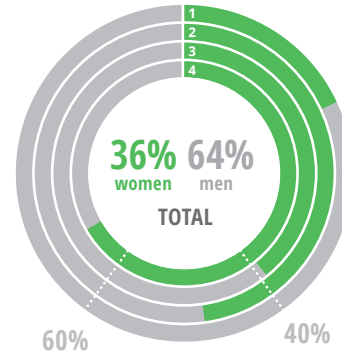


SHARE OF WOMEN PER MANAGERIAL LEVEL ASPIRE GLOBAL*



* excluding Pariplay and BtoBet

SHARE OF WOMEN PER FUNCTION ASPIRE GLOBAL GROUP



Function	Female	Male	Total
1 Research and Development	37	165	202
2 Operations	77	84	161
3 Acquisition, Sales and Marketing	20	31	51
4 Management and General	28	14	42
Total	162	294	456

EMPLOYMENT STATUS ASPIRE GLOBAL GROUP

Full-time / Part-time	Number of Employees	Percentage of Total
Full-time	449	98.5%
Part-time	7	1.5%
Total	456	100%

Permanent / Temporary	Number of Employees	Percentage of Total
Permanent	431	94.5%
Temporary	25	5.5%
Total	456	100%

NATIONALITIES OF EMPLOYEES

📍 = Office



TRAINING AND DEVELOPMENT – PROVIDE RELEVANT AND REGULAR TRAINING FOR ALL EMPLOYEES BASED ON INDIVIDUAL CAREER PLANS

Employees are offered ongoing training programs based on their personal needs and goals, including management training. Workshops are occasionally arranged on personal development themes, including business writing, multitasking and various soft skills. Aspire Global encourages employees to share their individual talents and skills through internal activities and events. Aspire Global also works with an organizational consultant to strengthen management skills through one-on-one sessions. The average hours of training per employee in the Aspire Global Group in 2020 was 14.

FAIR COMPENSATION - ATTRACT EMPLOYEES THROUGH HIGH VALUES AND FAIR BENEFITS THAT PROMOTE LONG-TERM ENGAGEMENT IN THE COMPANY

Aspire Global aims to attract employees in ways that promote long-term engagement in the company, based on values, fair benefits and wages that are commensurate with performance, experience and job requirements. Employees are fairly compensated in relation to a pay level equitable both internally with other employees and externally with the labor market in the industry. By focusing on long-term engagement, the company can attract people who are truly interested in Aspire Global and appreciate the corporate values.

CAREER DEVELOPMENT - REGULAR REVIEWS – A LONG-TERM CAREER THROUGH MUTUAL UNDERSTANDING AND A CLEAR ROAD MAP

Every employee should be familiar with the corporate strategy and see a clear connection between their own contribution and the overall performance for the company in relation to quantitative targets. Furthermore, all employee should have a clear and personal road map for potential career paths in the company. To ensure this, individual reviews are done twice a year, providing a basis for a personal development plan for logical reasoning, performance and professionalism, team and project performance, personal attributes and client relationship management. According to the 2020 employee survey, 78% of employees believe there is room for professional development within the company.

OFFER A SOUND WORK ENVIRONMENT

Aspire Global offers a modern, flexible, stimulating and healthy working environment that enables a work-life balance. According to the 2020 employee survey, 88% of the employees find the working environment to be sound and healthy. The corporate culture is warm, friendly and open-minded, free from formality and pretention. It's about working together and making things happen. People feel that they can overcome any obstacles and are able to freely express a dissenting opinion to their supervisor, knowing that the company reacts swiftly and constructively to HR

14

AVERAGE HOURS OF TRAINING PER EMPLOYEE ASPIRE GLOBAL GROUP

issues brought to its attention. In addition, there is a whistleblower function, enabling all employees to anonymously inform the CEO of worrying circumstances.

Terms and benefits – Working conditions that promote sound health

Working conditions differ somewhat between the sites based on the local environment and include benefits such as private health insurance, regular health checks and eye exams, subsidized transportation, parking and meals, weekly breakfasts, yoga/pilates classes at the office, free gym classes and nutrition workshops. Major holidays are celebrated in the office, creating a personal and warm environment with cultural connections to the local community. In a recent survey, the majority of employees agreed that the non-monetary terms and benefits offered by the company were fair. Tenure awards are given to employees who have been with the company for 5 and up. The company supports participation in sporting events organized in the various countries, including marathons, trail running, biking, paddle, tennis and sports teams representing the company in local business leagues.

COVID-19 and HR measures

Aspire Global is an online based company in its truest sense. Remote work and digital meetings are well-established ways of working, and have been for several years. During the pandemic, the company shifted completely to remote work. Employees and department work-flow smoothly transitioned and were able to continue without interruption. Employees had the option to take home IT and stationary equipment to create a sound work-from-home environment. IT works with an online support system to enable remote login and solve any technical issues. In order to protect the well-being of the employees, Aspire Global banned all business travel.

During the pandemic, the respective HR functions have organized virtual events for employees to take part in yoga and pilates classes, talks about nutrition, cooking classes and seminars about important topics such as mental health. During the year, when employees worked from home and were unable to socialize, the company sent small surprises to their homes, such as food delivery, flowers and sweets. The company subsidized counseling for employees for mental health support.

DIVERSITY AND INCLUSIVITY

EQUALITY - DIVERSE ORGANIZATION PROVES THAT PROFESSIONAL QUALIFICATIONS ARE VALUED FAIRLY

Aspire Global Group is convinced that diversity on the one hand drives innovation, and on the other hand is an indicator of a well-functioning recruitment process where personal preferences, cultural background, gender or physical disabilities don't stand in the way of professional judgment of the relevant qualifications. Against this backdrop, Aspire Global is proud to have employees from 36 nationalities, bringing together a variety of cultural backgrounds, perspectives and skills and reflecting the diversity of our players.

In 2020, women accounted for 36% of the company's employees. The CEO and sustainability committee are taking measures to create change, aiming for a 40/60 distribution on every management level, including promotions. While 2020 saw a positive absolute change in gender balance, with more women promoted to management levels, the overall trend was negative due to the acquisitions of Pariplay and BtoBet, whose gender distribution is unbalanced (20/80 - women/men), mostly due to their focus on product development and technology roles. Aspire Global kept a balanced workforce of 45/55 - women/men distribution.

WORK/LIFE BALANCE - ENABLE A MODERN AND EQUAL FAMILY LIFE ALONGSIDE AN ATTRACTIVE CAREER

Aspire Global is proud to support a work/life balance. Working conditions enable employees to combine a top career with an active and equal family life thanks to flexible solutions and attractive benefits. Parental leave is offered in accordance with the laws and standards of each country.

PROMOTING A CULTURE OF TRUST - ZERO TOLERANCE FOR DISCRIMINATION

The company has zero tolerance for discrimination of any kind and acts firmly and swiftly to prevent all forms of sexual harassment or discrimination based on ethnic/cultural background, sexual preference, etc. Through the whistleblower function, employees can anonymously report incidents to the CEO and the HR function, who have clear routines for handling any irregularities.

FOCUS AREAS AND PROGRESS

2020 COMMITMENT

Provide relevant and regular training for all employees based on individual career plans

Progress

On track
● ● ●

Info

Employees were offered ongoing training programs based on their personal needs and goals, including management training.

Support gender balance, aiming for a 40/60 (women/men) distribution on every management level, including promotions.

More to do

● ● ●

Positive absolute change with more women promoted to management level.

Negative relative change with acquisitions of Pariplay and BtoBet (largely focused on product development and technology roles), the Group's gender distribution became more imbalanced.

2021 COMMITMENT

Enable a long-term career through mutual understanding, regular training and a clear road map.

Towards



Aspire Impact

Be a sustainable and diverse organization that attracts and retains responsible employees through high values and fair benefits that promote long-term engagement in the company.

Support gender balance, aiming for a 40/60 (women/men) distribution on every management level, including promotions.



SAFE DIGITAL ENVIRONMENT

Providing a safe digital environment is alongside responsible gambling one of the most important aspects when it comes to the user experience. If players don't feel safe on the platform, they simply won't return. Providing a safe digital environment is about ensuring the highest standard of system and data security as well as a reliable, fair and transparent gambling product free from betting-related corruption.



INFORMATION SECURITY

Aspire Global's entertainment products are offered via state-of-the-art technology, which gives us the flexibility and scalability to grow. Given the scope and quantity of transactions we handle, cybersecurity is one of our top focus areas. Our security team is committed to implementing a certified information security ("InfoSec") management system that meets the International Organization for Standardization ("ISO") ISO27001:2013 framework and complies with all federal, state and international regulatory standards. Aspire Global's information security strategy is built on industry-known frameworks such as ISO 27001, focused on the optimization of security processes across all our operations and protecting the most critical processes and information. The company's holistic controls framework includes mechanisms to protect, detect, react to and monitor any threats and attacks to the business.

The main areas to ensure a safe digital environment from a player perspective are integrity, payment solutions, cybersecurity and fraud prevention. Regulations in these areas are very strict and the main focus is to comply with the complex framework and keep partners up to date on changes. When it comes to detecting internal problems, there is a whistleblower function, where employees can directly and anonymously inform the CEO.

The management team defines the targets, prioritizes projects and allocates resources to the various departments, reporting to the Sustainability Committee of the Board. The Payment Director, Regulation Manager and Security Specialist are responsible for various security aspects.

The Payments Director, who reports to the COO, manages all aspects of security and fraud related to payments, including Anti-Money Laundering, compliance and responsible gaming, the teams dedicated to which all report to the Payment Director.

The Regulation Manager, who reports to the CFO, is responsible for licenses and data protection, ensuring that these aspects of operations comply with laws and regulations in each jurisdiction where the company operates. The Regulation Manager monitors changes in the regulatory environment, assesses risks and initiates relevant actions, upholding corporate integrity while being commercially astute.

The Information Security Manager at Aspire Global is responsible for implementing the corporate Information Security policy, reporting to the Ops and IT Director. The Information Security Manager manages risk assessments and status updates and sets action plans, budgets and targets. Progress is monitored through security protocols and penetration tests, and any incidents are reported to the management team.

OUR STRATEGY FOR INFORMATION SECURITY

To proactively strengthen our information security, we:

- Identify InfoSec risks and put controls in place to reduce/mitigate them
- Build a security culture within our organization and improve information security awareness
- Annually verify compliance through ISO27001 audit
- Allow for the secure exchange of information

- Reduce potential vulnerabilities for the organization and lower the probability of a successful breach
- Maintain strong authentication mechanisms and audit log management

In addition to compliance with ISO frameworks, the company abides by PCI DSS (Payment Card Industry Data Security Standard), an information security standard that handles branded credit cards from major card companies and recognized as the industry's highest level of payment card information security.



BUILD A CULTURE OF SECURITY

Aspire Global maintains a culture of security pervasive throughout the organization, aligning people and practices with the security strategy. The efficiency of various technical information security controls is based on the people who interact with the information every day. Aspire Global's information security culture aims to protect information assets through best practices in the organization to influence employees' security behavior.

All employees participate in annual virtual or in-person formal information security training on the topics of data sharing, GDPR and data privacy, strong authentication, phishing and social engineering. Developers receive additional training on OWASP top 10 and SSLDC. In 2020, extra virtual training was provided on the topics of information security when working from home and secure internet access. In addition, the Information Security Manager has a regular phishing campaign to test user awareness.

Aspire Global maintains a role base access control (RBAC) method to restrict network or system access based on the role of individual users within the company. RBAC gives employees access rights only to the information they need to perform their jobs and prevents them from accessing information that does not pertain to them, enforcing the principles of "least privilege" and "need to know." Using granular permission management gives complete control over what a user (or group) can see, change or delete.

Average hours of Information Security Training per employee

	2020	2019
Information Security and GDPR training	2.25hr	1hr

DATA PRIVACY AND PROTECTION

Data protection is managed by a designated Data Protection Officer (DPO) responsible for compliance. This work is based on an extensive review of operations, current contracts and other arrangements for sharing data with partners, suppliers and partners, as well as internal procedures to safeguard protections before sharing personal data. Aspire Global was compliant with the European General Data Protection Regulation (GDPR) when it entered into force in May 2018 and monitors any changes in GDPR regulations to ensure that we remain compliant. All employees attend GDPR training annually.

CYBERSECURITY

Cybersecurity is about protecting the platform from potential attacks, viruses or espionage. Aspire Global regularly conducts controls, analyses tests and implements innovative tools to further increase security. Aspire Global also engages test labs, which conduct penetration tests of various brands to identify potential vulnerabilities before they are exposed and abused. Aspire Global materially invested in the tech department located in Kiev to ensure capacity for future growth. Two types of tests are conducted on web applications, integrations with other platforms (APIs) and core infrastructure to expose risks: vulnerability tests and penetration tests. Vulnerability tests search the systems for known vulnerabilities through automatic scans. Regulators require them, as do various certification bodies. For example, the Danish regulator requires data from vulnerability tests on a quarterly basis, as does the payment card industry according to DSS level 1 requirements, while the UK requests the data annually as part of a security audit. Penetration tests on the other hand attempt to actively exploit weaknesses in an environment. They are performed manually and require various levels of external expertise.

AML

Aspire Global has a strict policy on AML (Anti-Money Laundering). We are committed to allocate and use our resources to detect, report and block any activity which may be considered as money laundering as well as in combating the financing of any criminal or terrorist act or the use of proceeds of crime. This complies with all applicable obligations in relation to AML and CTF (Counter terrorism financing) rules. End users are identified through various automated KYC (Know Your Customer) processes at the point of registration (depending on the country of registration). Aspire Global interacts with players on an ongoing basis to monitor the account, transactional activity and understand the player profile, tailoring appropriate controls by using a risk-based approach. All active players are screened on an ongoing basis against a sanctions and PEP database.

Aspire Global monitors ML and TF indicators alongside investigating any instances where the perpetrator may be seeking to shift the ownership of funds to a third party rather than engaging in legitimate gameplay. Where we suspect, or have reasonable grounds to suspect, that funds are the

proceeds of criminal activity, we will disclose the information to the FIAU in Malta, the NCA in the UK or the FIPO in Sweden, as applicable. We have escalation channels set up for employees to report any unusual activity, which may give rise to any knowledge or suspicion of money laundering and/or the funding of terrorism, to the MLRO.

CRIME PREVENTION

Aspire Global has a highly secure fraud prevention scheme with constant payment analysis. All transactional and player betting activity is screened against a transaction monitoring database to ensure that we maintain oversight of suspicious activity that could be diluted with the daily game flow conducted by legitimate players who gamble for fun. While we focus on protecting our operation from fraudulent transactions, our main driver is to prevent that proceeds of crime or terrorist financing are channeled through our gambling platforms. Fraud and risk management are handled according to an established and efficient protocol that includes four main processes.

CRIME PREVENTION – HIGH AWARENESS AND FAST ACTION

1. **DETECTION VIA AUTOMATED RULES WITHIN THE MANAGEMENT SYSTEM**
2. **INVESTIGATION BY ASPIRE GLOBAL'S FRAUD SECTION**
3. **VERIFICATION IN CONJUNCTION WITH THE PAY-OUT SECTION AND CUSTOMER SERVICE DEPARTMENT**
4. **ACTIONS AND SANCTIONS TO QUICKLY AND ACCURATELY DETECT SUSPICIOUS AND FRAUDULENT BEHAVIORAL PATTERNS**

Aspire Global operates a regular training program for employees on how to identify a money laundering or terrorist financing attempt, including our responsibilities and actions towards its prevention. This to ensure that all employees understand the company's internal reporting procedure. In case of a suspected money laundering or terrorist financing activity, a report is lodged to the MLRO.

In 2020, 94 cases were reviewed by the Group MLRO. Aspire Global is committed to monitoring suspicious activities that would not ordinarily be flagged in other reports. This is done by filing a dedicated Suspicious Activity Report (SAR). In 2020, Aspire Global filed around 71 SAR's on the basis of internal investigations.

RESPONSIBLE PARTNERS AND SUPPLIERS

Partners

Aspire Global believes that long-term relationships based on mutual interests generate healthy, sustainable growth for all parties involved. Partners are mainly responsible for marketing, while Aspire Global manages everything around the platform. Maintaining a close dialogue with partners benefits responsible gaming and information security, as it enables us to pinpoint and implement actions faster. Aspire Global's account managers are in continuous communication with partners to identify needs, key concerns and challenges. Updates on regulatory changes and training are provided to the operators on an ongoing basis.

Suppliers

Aspire Global's main suppliers are game developers, providers of payment solutions and marketing companies. Other suppliers provide office-related services as well as legal or financial services. As with our partners, Aspire Global

believes that long-term relationships based on mutual interests and clear expectations generate healthy, sustainable growth for all parties involved. A contract is signed upon agreement, clarifying the expectations for both sides when it comes to reliability, security and the ethical framework.

SUSTAINABLE SOURCING PROCESS

Aspire has a number of external suppliers that provide products or services related to various aspects of operations. This includes the offering, such as game content, payment solutions or digital campaigns, or could relate to operations, such as office maintenance, server capacity or advisory. In either case, the sourcing of these services and products is regulated by various principles and requirements to protect the interests of the stakeholders in question, whether it is the environment, local communities, the gaming industry as a whole or individuals who are accidentally exposed to the offering.



Choosing reliable suppliers requires building and maintaining trust in the company – as a provider of safe entertainment, as a professional employer, as a sustainable investment and a reliable license holder. Objective criteria such as quantitative key performance indicators (KPIs), transparent contractual conditions, long-term relationships aimed at short-term cost savings, and regular evaluations based on measurable indicators and active dialogue are the four

principles that ensure a sound and sustainable sourcing process. Suppliers pledge to abide by the contract and related policies, and in the event that Aspire Global becomes aware of any intentional breach of contract, the cooperation is immediately discontinued. It is up to each department to ensure that sourced products and services comply with the relevant frameworks.

SUPPLY CATEGORY*	PRODUCTS/ SERVICES	ASPECTS	FRAMEWORK	OTHER STAKEHOLDERS	MAIN LOCATIONS OF SOURCE excl. Malta/Israel/ Ukraine
Content	Games	Monetary or children appeal	Ethical policy	Players/global society	Luxembourg, Cyprus
Marketing services	Affiliate/Media space	Public exposure	Marketing policy	Players/global society	Gibraltar
Hardware	Servers, computers	Energy efficiency/reliability	Environmental policy	Global society	Locally
Processing service providers	Payment solutions	Reliability	Security policy	Players	UK, Netherlands, Luxembourg
Server hosting	Server capacity: Cloud + Physical	Energy efficiency/reliability	Security policy and coming environmental policy	Global society	Netherlands, Ireland
Office supplies	Paper/Disposables	Recycling/no plastics	Environmental policy	Global society	Locally
Office maintenance	Cleaning services	Working conditions	Human rights and local law	Local society	Locally
Advisory services	Technical/Legal/Financial/PR/HR/Sustainability/Compliance	Certification/expertise/sound business ethics	Corporate culture	Authorities/investors/employees	At location of operations

* info reflects Aspire Global

FOCUS AREAS AND PROGRESS

2020 COMMITMENT

Maintain culture of security that is pervasive throughout the organization, aligning people and practices with the security strategy.

Progress

On track



Info

Employees have received increased training in information security, GDPR and security best practices.

Proactively strengthen our information security.

On track



Annual compliance verified via ISO27001 audit.

2021 COMMITMENT

Implement a certified information security management system (ISO 27001) for all Aspire Global entities, operating under a single set of governing security policies, procedures and guidelines.

Towards



Aspire Impact

Ensure the highest standard of system and data security as well as a reliable, fair and transparent gambling product free from betting-related corruption.

Enhance SOC service to remediate advanced cyber threats across on-premises networks, public cloud environments, SaaS applications and endpoints.



GRI INDEX

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102-4	Location of operations	67	MR	Introduction	●	
102-5	Ownership and legal form	53	CGR	Shareholders	●	
102-6	Markets served	67-68	MR	Operations	●	
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102-21	Consulting stakeholders on economic, environmental, and social topics	10-11	SR	Stakeholders and materiality	●	
102-22	Composition of the highest governance body and its committees	56, 60	CGR	Board committees, Board members	●	
102-23	Chair of the highest governance body	55-56, 60	CGR	The Chairman, The Board	●	
102-24	Nominating and selecting the highest governance body	54-55	CGR	Nomination committee, Composition of the Board	●	
102-25	Conflict of interest	60 ¹⁾	CGR	The Board, other assignments	●	
102-26	Role of highest governance body in setting purpose, values, and strategy	55-56	CGR	Board meetings	●	
102-27	Collective knowledge of highest governance body	56	SR	Sustainability Committee	●	

1) Enclosed in the "Director service agreement"

MR = Management report

● = Reported for 2020

SR = Sustainability report

CGR = Corporate governance report

FS = Financial statements

RA = Risk assessment

Disclosure		Page	Report	Section	Status	Omission/comment
102-28	Evaluating the highest governance body's performance	56	CGR	Evaluation of the Board and CEO	●	
102-29	Identifying and managing economic, environmental, and social impacts	8-11	SR	Strategy: Stakeholders and Materiality Analysis	●	
102-30	Effectiveness of risk management processes	59 ¹⁾	CGR	Risk assessment	●	
102-31	Review of economic, environmental, and social topics	2, 11	SR	Responsibilities	●	
102-32	Highest governance body's role in sustainability reporting	2	SR	About the report	●	
102-33	Communicating critical concerns	1	SR	In this Report and Contact	●	
102-35	Remuneration policies	56-57	CGR	Remuneration	●	
102-36	Process for determining remuneration	56-57	CGR	Remuneration	●	
102-37	Stakeholders' involvement in remuneration	53	CGR	Division of authority	●	
Stakeholder engagement						
102-40	List of stakeholder groups	10-11	SR	Stakeholders and materiality	●	
102-42	Identifying and selecting stakeholders	10-11	SR	Stakeholders and materiality	●	
102-43	Approach to stakeholder engagement	10-11	SR	Stakeholders and Materiality Analysis	●	
102-44	Key topics and concerns raised	11	SR	Materiality	●	
102-45	Entities included in the consolidated financial statements	89	FS	Consolidated financial statements	●	
Reporting practice						
102-46	Defining report content and topic Boundaries	10-11	SR	Stakeholders and materiality, Analysis	●	
102-47	List of material topics	11	SR	Materiality Analysis	●	
102-48	Restatements of information	11	SR	Materiality Analysis	●	
102-49	Changes in reporting	11	SR	Materiality Analysis	●	
102-50	Reporting period	2	SR	About this report	●	
102-51	Date of most recent report	2	SR	About this report	●	
102-52	Reporting cycle	2	SR	About this report	●	
102-53	Contact point for questions regarding the report	39	SR	Contact	●	
102-54	Claims of reporting in accordance with the GRI Standards	39	SR	Contact	●	
102-55	GRI content index	34-37	SR	GRI-index	●	
102-56	External assurance	39	SR	Contact	●	

1) Sustainability risks are integrated in all other risk factors

Disclosure		Page	Report	Section	Status	Omission/comment
Economic						
GRI 207: Tax						
207-1	Approach to tax	15	SR	Paying tax,	●	
207-2	Tax governance, control, and risk management	15, 62	SR, FS	Paying tax, Risk factors and mitigation	●	
207-3	Stakeholder engagement and management of concerns related to tax	7, 10-11	SR	Values, and Strategy	●	

Environmental

Management approach

103-1	Explanation of the material topic and its Boundary	11, 13-15	SR	Materiality Analysis, Global Impact - Minimize Environmental Impact, Focus Areas and Progress	●	
103-2	The management approach and its components	11, 13-15	SR	Materiality Analysis, Global Impact - Minimize Environmental Impact, Focus Areas and Progress	●	
103-3	Evaluation of the management approach	11, 13-15	SR	Materiality Analysis, Global Impact - Minimize Environmental Impact, Focus Areas and Progress	●	

GRI 302: Energy

302-1	Energy consumption within the organization	13	SR	Carbon Footprint	●	
302-2	Energy consumption outside of the organization	13	SR	Carbon Footprint	●	
302-3	Energy intensity	13	SR	Carbon Footprint	●	
302-4	Reduction of Energy Consumption	14-15	SR	Our Carbon Management Journey, Focus Areas and Progress	●	

GRI 305: Emissions

305-1	Direct (Scope 1) GHG emissions	13	SR	Carbon Footprint	●	
305-2	Energy indirect (Scope 2) GHG emissions	13	SR	Carbon Footprint	●	
305-5	Reduction of GHG emissions	14-15	SR	Our Carbon Management Journey, Focus Areas and Progress	●	

GRI 306: Waste

306-1	Waste generation and significant waste-related impacts	14	SR	Waste Management	●	
306-2	Management of significant waste-related impacts	14-15	SR	Waste Management, Focus Areas and Progress	●	

Social

PEOPLE

Management approach

103-1	Explanation of the material topic and its Boundary	11, 22-26	SR	Materiality Analysis, People chapter	●	
103-2	The management approach and its components	11, 22-26	SR	Materiality Analysis, People chapter	●	
103-3	Evaluation of the management approach	11, 26	SR	Materiality Analysis, Focus Areas and Progress	●	

Disclosure		Page	Report	Section	Status	Omission/comment
GRI 401: Employment						
401-1	New employee hires and employee turnover	23, 26	SR	A fast-growing organization, Fair Compensation, Offer Sound Work Environment	●	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	23, 26	SR	A fast-growing organization, Fair Compensation, Offer Sound Work Environment	●	
401-3	Parental leave	27	SR	Work/life balance	●	
GRI 404: Training and Education						
404-1	Average hours of training per year per employee	26	SR	Training and development	●	
404-2	Programs for upgrading employee skills and transition	26	SR	Career development	●	
404-3	Percentage of employees receiving regular performance and career development reviews	26	SR	Career development	●	
GRI 405: Diversity and Equal Opportunity						
405-1	Diversity of governance bodies and employees	24-25, 27	SR	Employee data, growth and diversity, diversity and inclusivity	●	
GRI 413: Local Communities						
413-1	Operations with local community engagement, impact assessment, and development programs	14-15	SR	Local impact	●	
PRODUCTS						
Management approach						
103-1	Explanation of the material topic and its Boundary	11, 16-21, 28-33	SR	Materiality Analysis, Safe User Experience chapter, Safe Digital Environment chapter	●	
103-2	The management approach and its components	11, 16-21, 28-33	SR	Materiality Analysis, Focus Areas and Progress	●	
103-3	Evaluation of the management approach	11, 21, 33	SR	Materiality Analysis, Focus Areas and Progress	●	
GRI 416: Customer Health and Safety						
416-1	Assessment of the health and safety impacts of product and service categories	16-21	SR	Safe User Experience: Responsible Gambling	●	
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	16-21	SR	Safe User Experience: Responsible Gambling	●	
GRI 417: Marketing and Labeling						
417-1	Requirements for product and service information and labeling	20-21	SR	Safe User Experience: Clear Labeling, Responsible Marketing	●	Only 417-1a-3 & 417-1b are applicable
417-2	Incidents of non-compliance concerning product and service information and labeling	20-21	SR	Safe User Experience: Clear Labeling, Responsible Marketing	●	
417-3	Incidents of non-compliance concerning marketing communications	20-21	SR	Safe User Experience: Clear Labeling, Responsible Marketing	●	
GRI 418: Customer Privacy						
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	28-33	SR	Safe Digital Environment: Data Privacy and Protection	●	
GRI 419: Socioeconomic Compliance						
419-1	Non-compliance with laws and regulations in the social and economic area	6-7, 16-21, 28-33	SR	Values, Safe User Experience, Safe Digital Environment	●	

GLOSSARY

AML	Anti-Money Laundering
CEO	Chief Executive Officer
CFO	Chief Financial Officer
CO2e	Carbon Dioxide Equivalent
CTF	Counter Terrorist Financing
DPO	Data Protection Officer
FIAU	Financial Intelligence Analysis Unit
FIPO	Finanspolisen Rikskriminalpolisen
GDPR	General Data Protection Regulation
GHG	Greenhouse gas
HRIS	Human Resource Information System
HR	Human Resources
iGEN	iGaming European Network
InfoSec	Information Security
KPIs	Key Performance Indicators
KYC	Know Your Customer
MLRO	Money Laundering Reporting Officer
NCA	National Crime Agency
PCI-DSS	Payment Card Industry – Data Security Standard
PEP	Politically Exposed Person
PnR	Payments and Risk
RABC	Role Base Access Control
SAR	Suspicious Activity Report
SDGs	Sustainable Development Goals
SOC	Security Operations Center
UK	United Kingdom
UKGC	United Kingdom Gambling Commission

CONTACT

For questions regarding the report or its contents, contact the sustainability manager by email sustainability@aspireglobal.com



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