

 **aspireglobal**

## SUSTAINABILITY REPORT 2021



 **aspireimpact**



# ABOUT THE REPORT

The 2021 sustainability report is prepared according to the GRI standards, the core option. The report is published once a year.

## 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 2021



Strengthened position in  
(new) regulated markets



Reaching status of  
a Carbon Neutral  
Company



Launched dedicated  
sustainability webpages  
on AspireGlobal.com



Opening of newly  
refurbished office  
in Gibraltar



ISO (re) certification for all  
Group Companies: Aspire  
Global, BtoBet, Pariplay



Strengthened CSR efforts  
with volunteering, spon-  
sorships and donations



Brands participated in  
Safer Gambling Week UK



Research collaboration on  
responsible gambling with  
Bournemouth University



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

# ASPIRE IMPACT: BUILDING A SUSTAINABLE FUTURE

## How does Aspire Global embed ESG into its business and what is the importance of driving a sustainable business?

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 an 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.

## Can you explain in more detail what you think about your social responsibility towards players and what actions have you taken to address the major challenges?

Providing a safe user experience in terms of responsible gambling is the single most important responsibility. It is the source of long-term growth and aligns with the Company's mission. The Company can significantly influence the players who consume products when visiting any of Aspire Global's partner operators. I believe that the future lies with those companies that can generate long-term profit while promoting sustainable user behavior. Proactively interacting early enough and in the right way can help someone keep control of their gambling and the Company will retain them as a customer, instead of them choosing to opt for a self-exclusion or closing their account entirely. In the long term, this approach is more sustainable for our end users and our business.

## Besides responsible gambling and responsible marketing, governance is probably the most relevant ESG area for investors in the gaming sector. What are your commitments here?

Under Governance we focus on factors related to decision-making, transparency and reporting, and information security. Providing a safe digital environment is alongside responsible gambling one of the most important aspects when it comes to the user experience. If end users don't feel safe on our 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.

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

We are proud to demonstrate our ongoing commitment to sustainability and share our ESG impact, activities and performance in this dedicated report. Sustainability is integrated in our business strategy through four focus areas that monitor progress and set out targets to achieve sustainable, long-term value creation: Environment, Safe User Experience, People and Safe Digital Environment. Our focus areas and progress are controlled by monitoring and evaluating existing commitments and setting new commitments towards our long-term sustainability goals.

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

“ I believe that the future lies with those companies that can generate long-term profit while promoting sustainable user behavior.





# IN THIS REPORT

## DRIVING POSITIVE IMPACT

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

In 2021, we continued our direction set out in the 2020 Sustainability report and drove progress towards four pri-

ority 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 P. 10



## 2. SAFE USER EXPERIENCE P. 14



## 3. PEOPLE P. 20



## 4. SAFE DIGITAL ENVIRONMENT P. 26



# BUSINESS OVERVIEW AND MARKETS



## ASPIRE GLOBAL - A LEADING IGAMING SUPPLIER

Our B2B offering comprises a robust technical platform, proprietary casino games, a proprietary sportsbook, a game aggregator and bingo. The platform itself can be used exclusively or combined with a wide range of services. Aspire Global also operated several B2C brands, but divested its B2C segment in December 2021. The Group has a broad presence in regulated markets spanning Europe, North

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.

## OUR VISION

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

### ASPIRE GLOBAL LICENSES

- Denmark
- Germany sports betting and slots license (in process of applying)
- Ireland (sports betting)
- Malta
- Ontario (Canada) supplier and operator registration (in process of applying)
- Portugal (platform certification)
- United Kingdom
- GLI-19 standards for interactive gaming systems

### PARIPLAY LICENSES

- Alberta (Canada)
- Gibraltar
- Greece
- Malta
- Nova Scotia (Canada)
- Ontario (Canada)
- Romania
- United Kingdom
- USA**
- Michigan (provisional license)
- New Jersey (in process of applying)
- Pennsylvania (in process of applying)
- West Virginia

### PARIPLAY GAME CERTIFICATIONS

- Bulgaria
- Colombia
- Czech Republic (in process of applying)
- Denmark
- Isle of Man
- Italy
- Latvia
- Lithuania
- Malta
- Netherlands
- Portugal
- Romania
- Spain
- Sweden
- Switzerland
- United Kingdom
- USA**
- Michigan
- New Jersey
- West Virginia

### BTOBET CERTIFICATES

- GLI-33 standards for event wagering systems
- UK Remote Gambling and Software Technical Standards



# 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 / END USERS

Aspire Global provides entertainment in a safe gaming environment. Aspire Global's B2B managed services offering involves interactions directly with end users through responsible customer relations, with responsible gambling at the heart of its operations.

## EMPLOYEES

Aspire Global offers exciting career opportunities in a modern, flexible, stimulating and sound work 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 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 as well as global society when it comes to the environment, taxes, job opportunities and the impact of the gaming industry as a whole. Stakeholder dialogue is maintained via authorities and associations representing the interests of the public society

## CONNECTING SDGS

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





## 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 should be realized and reported. Whether an issue is considered material depends on a) the 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 applied 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

##### Responsible Gambling

- 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

##### Anti-Corruption

- 16 Anti-Corruption

##### Reliable Suppliers

- 17 Reliable suppliers



## LOCAL IMPACT INITIATIVES



**EARTH DAY –  
OUR PEOPLE  
VOLUNTEERING  
AT A BEACH  
CLEAN-UP.**



**RANDOM ACTS OF  
KINDNESS DAY -  
OUR PEOPLE VOL-  
UNTEERING AT A  
HORSE RESCUE.**



**OUR PEOPLE  
VOLUNTEERING  
AT A DOG  
SANCTUARY.**



**SPONSORING SHE: SOCIAL HUB ENTREPRENEURS' PANEL ON DIVERSITY  
AND EQUALITY – DURING INTERNATIONAL WOMEN'S MONTH**



**DONATIONS TO SE-  
VERAL CHARITABLE  
ORGANIZATIONS,  
INCLUDING A FOOD  
BANK AND BREAST  
CANCER FOUNDA-  
TION.**

**Foodbank**  
Lifeline Foundation

**THE MARIGOLD FOUNDATION**  
ADV IN THE COMMUNITY



# ENVIRONMENT



**Aspire Global is a carbon neutral company that wants to protect the 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 contributing 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. 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 executed on an annual basis, which enables us to minimize our environmental impact by monitoring, reducing and offsetting emissions. Due to the Company's commitment to minimizing its footprint, Aspire Global reached the status of being a carbon neutral company in 2021.

### 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 (CO<sub>2</sub>e).

Aspire Global is CO<sub>2</sub>e assessed by Carbon Footprint Ltd, which measured our greenhouse gas (GHG) emissions from January 1, 2021 to December 31, 2021 based on a dataset resulting from energy consumption and business transport activities. Subsequently, we compared our Carbon Footprint Assessment with the 2020 baseline year.

Aspire Global's 2021 total emissions are 422.35 tonnes of CO<sub>2</sub>e. The most significant emission source is air travel, accounting for 41.8% of Aspire Global's carbon footprint. Aspire Global's total emissions have increased 13.0% from the baseline year, while both tCO<sub>2</sub>e per employee and per £M turnover have decreased by 10.5% and 14.3% respectively.

In 2020, the COVID-19 pandemic and national restrictions enforcing strict social distancing had a positive impact on the carbon footprint, which continued in 2021. This was mainly due to reduced business travel, commuting and office energy usage after remote work became the norm. In the second half of 2021, business travel slightly increased compared to 2020 due to the easing of COVID-19 restrictions, though the Company focused on essential flights only.



Carbon  
Neutral  
Organisation

**//** In 2021, Aspire Global reached the goal of becoming a Carbon Neutral Company



MEASURE



AIM



REDUCE



OFFSET

Metric	2020	2021	% change on baseline year (2020)
Total tonnes CO <sub>2</sub> e	373.75	422.35	13.0%
Tonnes of CO <sub>2</sub> e per employee	0.92	0.82	-10.5%
Tonnes of CO <sub>2</sub> e per £M turnover	2.31	1.98	-14.3%

### EMISSIONS FROM ENERGY USAGE AT SITE FACILITIES

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 REMOTE WORK

Emissions from working from home were calculated and taken into account in the carbon footprint assessment.

### EMISSIONS FROM TRAVEL

Aspire Global tries to minimize the need for travel through video conferencing. Air travel is the largest contributor, accounting for 76.5% of the total transport emissions. Employee commuting was the second largest contributor to travel emissions, accounting for 23.1%. Aspire Global encourages employees to carpool or where possible choose green commuting.

With global warming being mankind's greatest challenge in the coming years I am proud that Pariplay, via Aspire's environment program, already this year reached the Group's target to be carbon neutral. For Pariplay this is as important as being a Tier 1 aggregator! Offering the best games to operators in the most efficient ways is what we do every day. Fighting global warming is what we do for our kids.

– Jesper Kärbrink, Chairman Pariplay

### WASTE MANAGEMENT

The waste in our offices, canteens and kitchens is separated according to local recycling schemes. During 2020, Aspire Global held an environmental 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.

### OFFSETTING – CARBON NEUTRALITY

In 2021, Aspire Global has taken the next step to offset its emissions fully and become a carbon neutral company. By carbon offsetting, the Company (after its measuring, aiming and reducing efforts) continued to balance out the remaining emissions, by financially supporting a renewable energy project in India (wind power project by Bothe Windfarm Development), contributing further to providing solutions to climate change.



## 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 regulatory 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.

### 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. Some of our local impact initiatives included our people volunteering at a beach cleanup, a horse rescue farm and a dog sanctuary. Donations to several charitable organizations were made in 2021, among them a food bank and breast cancer foundation.

### PAY TAXES AND PROVIDE JOB OPPORTUNITIES

Aspire Global is active in various countries and employs 544 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.

### THE IGAMING EUROPEAN NETWORK

As a member of the iGaming European Network (iGEN), Aspire Global is one of 27 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.



## FOCUS AREAS AND PROGRESS – ENVIRONMENT

### 2021 COMMITMENT

Implement Group corporate environmental policy and program.

#### Progress

On track  
● ● ●

#### Info

Implemented with note that the composition of the Group changes in 2022, so a new commitment has been set.

Evaluate waste processes and encourage the use of the waste hierarchy to increase recycling and prevent landfill waste.

On track  
● ● ●

Campaign focused on waste management and environmental awareness in our offices.

### 2022 COMMITMENT

Focus on less travel – best practices from zero travel during Covid times and travel with airlines offering biofuel/ green tickets.

#### Towards



Implement a Group environmental policy – based on recycle, reduce, reuse: plastic free, reusable utensils, recycle tech equipment, supplier dd, etc.



Remain a carbon neutral company committed to further minimizing the environmental impact throughout our operations by:

**measuring > targeting > reducing > offsetting.**





# SAFE 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 who visit any of our partner operators.



# 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 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 academic researchers to continuously improve and optimize our tools.

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 marketing while managing customer support and contact with their players.

The management team defines the targets, prioritizes projects and allocates resources to the various departments, including Compliance, Responsible Gambling, Anti-Money Laundering, Tech, and Customer Support. The Responsible Gambling team, together with the customer support department, manages all direct dialogue with players, while the Customer Success 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.



### FOCUS ON REGULATED MARKETS

Aspire Global has a clear focus on regulated markets, with 79% 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, Danish Spillemyndigheden, Malta Gaming Authority, the SRIJ in Portugal and the Gambling Regulatory Authority of Ireland (see full overview on page 6). 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.

## 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, enabling players to block themselves from all iGaming platforms in the locally regulated markets.

The Company wants 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.

## 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 towards safer 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, the Loyalty and Wellbeing Team monitors player retention in relation to responsible gaming, and 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 the 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.



## 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, to develop 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.

#### Work Package 2

Aspire Global further strengthened its academic partnership with Bournemouth University by participation in the Work Package 2 project, focused on reviewing/creating responsible gambling messages.



### SAFER GAMBLING WEEK

Aspire Global was an official supporter of Safer Gambling Week (SGW) UK, November 1-7, showcasing responsible gambling banners and messages throughout the week on the homepage of our UK facing partners' sites 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.

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.

This year, we hosted a YouTube LIVE talk from Aspire Global headquarters during SGW with Bournemouth University on research in safer gambling.





## 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 signs 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 Laborato-

ries 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.

# 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.

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. 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 of gambling products and services is undertaken in a socially responsible manner.

## MARKETING COMPLIANCE SCANNING TOOLS

Aspire Global uses an affiliate monitoring compliance tool 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. 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 – SAFE USER EXPERIENCE

### 2021 COMMITMENT

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

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

### 2022 COMMITMENT

Use innovative technology like machine learning and AI to increase efficiency and optimize tools as part of the responsible gaming identification process.

Continue and set up new RET collaborations in research, education and treatment, contributing to safer gambling.

### Progress

On track  
● ● ●

On track  
● ● ●

### Towards



### Info

Collaboration on various projects with academics to contribute to responsible gambling research.

Enhanced and further automated the gambling harm detection capabilities of our monitoring systems.

 **aspireimpact**

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





# 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 2021, Aspire Global had 544 employees (an increase from 456 in 2020 and 312 in 2019) 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 138 employees mainly focused on management, operations, payments and risk, marketing and CRM, and product development, while most technology is based in Kiev, Ukraine, with 110 employees at year-end. The office in Tel Aviv, Israel, has 49 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 119 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 136 employees, mainly based at the BtoBet headquarters 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.

# 544

(456 IN 2020)

**TOTAL EMPLOYEES ASPIRE GLOBAL GROUP**

## 289

(280 in 2020)

**Aspire Global**

## 119

(83 in 2020)

**Pariplay**

## 136

(93 in 2020)

**BtoBet**

## OFFER ATTRACTIVE CAREER OPPORTUNITIES

Aspire Global offers attractive career opportunities in a sound work 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.

# 90%

of employees recommend  
Aspire Global as an  
Employer of Choice

# 87%

of employees love the  
atmosphere and working  
at Aspire Global

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 work environment that enables a work-life balance.

In the annual employee survey conducted in 2021, 90% of employees said they would recommend Aspire Global as an employer of choice, and 87% of the employees love the atmosphere and working at Aspire Global.

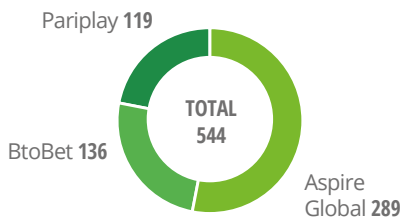
Aspire Global uses an HR management platform that helps the Company to attract, stimulate and retain talent through data-driven HR tools. All employees of Aspire Global have access to the system. Furthermore, the HR team is connected to a global recruitment system that records and spreads information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



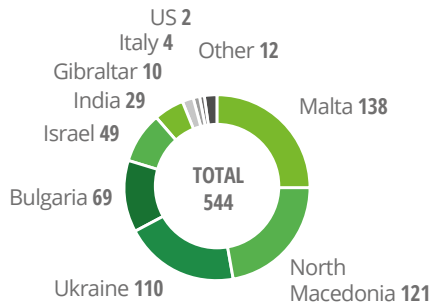
# EMPLOYEE DATA

## – GROWTH AND DIVERSITY

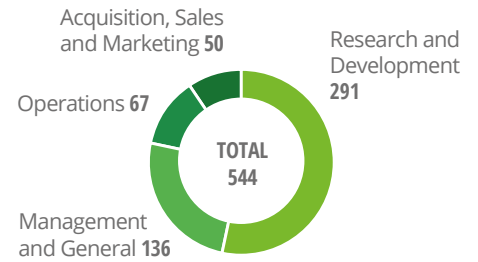
Employees per brand



Employees per office



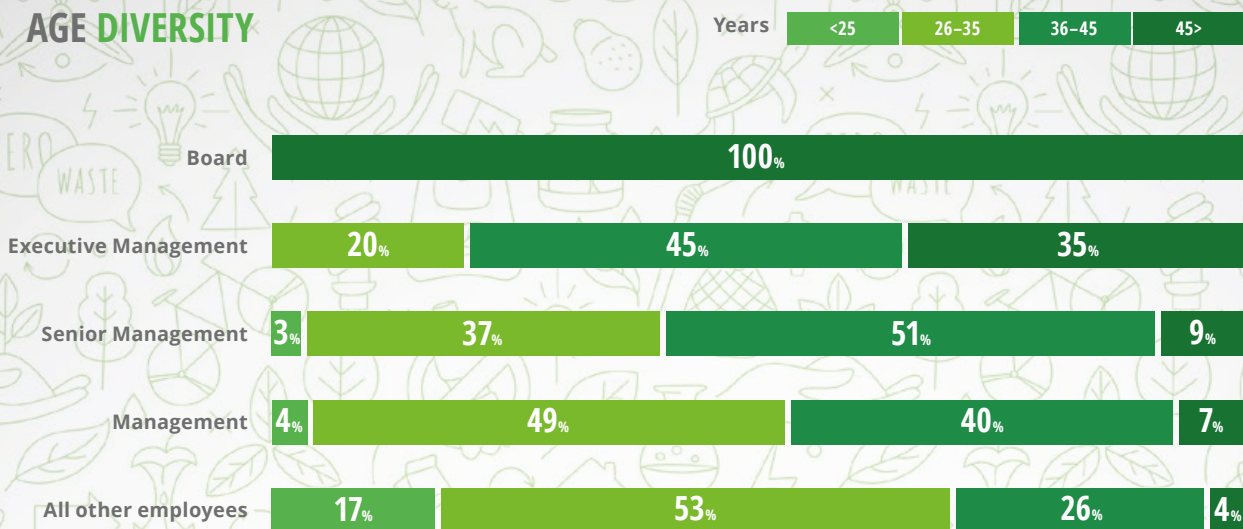
Employees per function

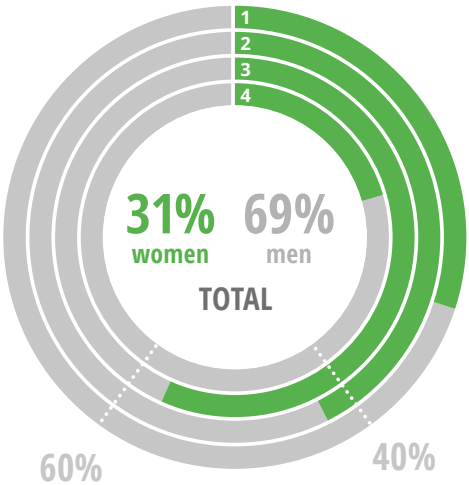


### SHARE OF FEMALE EMPLOYEES ASPIRE GLOBAL GROUP

Gender Diversity	2021	2020	Share of Total 2021	Share of Total 2020	Progress towards 40/60
Share of women of total employees	171/544	162 / 456	31%	36%	31 / 69
<b>Share of women per Office</b>					
Aspire Global	121 / 289	125 / 280	42%	45%	Balanced
Pariplay	21 / 119	17 / 83	18%	20%	Unbalanced
BtoBet	29 / 136	20 / 93	21%	22%	Unbalanced

### AGE DIVERSITY



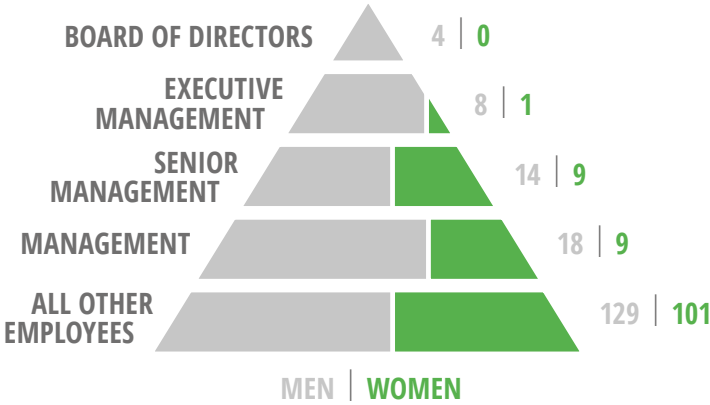


## SHARE OF WOMEN PER FUNCTION ASPIRE GLOBAL GROUP

Function	Women	Men	Total
1 Acquisition, Sales and Marketing	15	35	50
2 Management and General	58	78	136
2 Operations	38	29	67
4 Research and Development	60	231	291
	171	373	544

## SHARE OF WOMEN PER MANAGERIAL LEVEL ASPIRE GLOBAL\*

\* excluding Pariplay and BtoBet



## NATIONALITIES OF EMPLOYEES

• = Office  
■ = Nationalities of employees

Las Vegas

Italy  
Malta  
North Macedonia  
Israel  
Ukraine  
Bulgaria

India

**43**

**TOTAL NATIONALITIES**



### 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 2021 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. Aspire Global is a member of the Maltese association HR Connect, which acts as the industry's voice vis-à-vis the government, educational institutions and commercial entities on all employee-related matters.

### 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 employees 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 2021 employee survey, 82% 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 2021 employee survey, 87% 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

# 14

average hours of  
training per employee  
Aspire Global Group

# 82%

of employees believe there is  
room for professional develop-  
ment within the company  
(up from 78% in 2020)

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 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 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. 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 years 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, and remote work and digital meetings have been well-established ways of working 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.

# 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 43 nationalities, bringing together a variety of cultural backgrounds, perspectives and skills and reflecting the diversity of our players.

In 2021, women accounted for 31% 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. 2021 saw a slight negative change in gender balance, which is mostly due to Aspire Global's focus on product development and technology roles.

## 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 – PEOPLE

### 2021 COMMITMENT

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

### Progress

On track  
● ● ●

### Info

Employees were offered ongoing training programs based on their personal needs and goals, including management training. Employee surveys show increase in % of employees who believe there is room for professional development within the Company.

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

### More to do

● ● ●

The Group's gender distribution became more imbalanced, largely due to increased B2B focus on product development and technology roles.

### 2022 COMMITMENT

Focus on initiatives to increase diversity and gender balance in roles in product development and technology.

### Towards



Further integration of people sustainability incentives on Group level.



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.





# 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 standards 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, Pariplay's and BtoBet's information security strategy is built on the ISO 27001 frameworks, focused on the optimization of security processes across all our Group 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.

**ISO  
(RE) CERTIFICATION  
IN 2021 ACHIEVED FOR  
ALL GROUP COMPANIES:  
ASPIRE GLOBAL,  
BTOBET AND  
PARIPLAY**

## 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 and 2021, 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 performs regular phishing campaigns 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."

### Average hours of Information Security Training per employee

	2021	2020
Information Security and GDPR training	3hr	2.25hr

## 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 is recognized as the industry's highest level of payment card information security.



## 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 complies with the European General Data Protection Regulation (GDPR) and annual GDPR training is mandatory for all employees.

## 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 security of our tech department located in Kiev to ensure capacity for future growth.

# AML

Aspire Global has a strict policy on Anti-Money Laundering (AML). The Company is committed to allocate and use resources to detect, report and block any activity which may be considered as money laundering as well as to combat 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 Counter Terrorism Financing (CTF) rules. End users are identified through various automated Know Your Customer (KYC) processes at the point of registration (depending on the country of registration). We interact with end users 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 AML and CTF 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 Financial Authority, as applicable per jurisdiction. 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 Money Laundering Reporting Officer (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. 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 conducts annual mandatory training for all 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 with the MLRO.

In 2021, 202 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 2021, Aspire Global filed around 170 SARs 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 inter-

ests 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

The sourcing of 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 as a reliable license holder. 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.



## FOCUS AREAS AND PROGRESS – SAFE DIGITAL ENVIRONMENT

### 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.

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

### 2022 COMMITMENT

Integrate and create further synergies in Group level Information and Cybersecurity.

Focus to align Group security culture and information security awareness.

### Progress

On track



On track



### Towards



### Info

In 2021, ISO (re) certification was achieved for all Group Companies: Aspire Global, BtoBet, and Pariplay

Implemented

**aspireimpact**

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





# GRI INDEX

Disclosure	Page	Report	Section	Status	Omission/comment
<b>General Standard Disclosures</b>					
<b>GRI 102: General Disclosures</b>					
<b>The organizational profile</b>					
102-1	Name of the organization	28	MR	The Company	●
102-2	Activities, brands, products, and services	28-29	MR	Operations	●
102-3	Location of headquarters	28	MR	Introduction	●
102-4	Location of operations	28	MR	Introduction	●
102-5	Ownership and legal form	12	CGR	Shareholders	●
102-6	Markets served	28-29	MR	Operations	●
102-7	Scale of the organization	28-29	MR	Operations	●
102-8	Information on employees and other workers	28-29	MR	Operations	●
102-9	Supply chain	29	SR	A sustainable sourcing process	●
102-10	Significant changes to the organization and its supply chain	29	SR	A sustainable sourcing process	●
102-11	Precautionary Principle or approach	29	SR	A sustainable sourcing process	●
102-12	External initiatives	7-8	SR	Stakeholder value	●
102-13	Membership of associations	13	SR	Local impact	●
<b>Strategy</b>					
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102-15	Key impacts, risks, and opportunities	22-26	RA	Risk factors	●
<b>Ethics and integrity</b>					
102-16	Values, principles, standards, and norms of behavior	7-8	SR	Stakeholder value	●
102-17	Mechanisms for advice and concerns about ethics and integrity	2, 6-8, 24, 34	SR	Responsibilities, Strategy, Sound Work Environment, Contact	●
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102-21	Consulting stakeholders on economic, environmental, and social topics	7-8	SR	Stakeholders and materiality	●
102-22	Composition of the highest governance body and its committees	15, 20	CGR	Board committees, Board members	●
102-23	Chair of the highest governance body	14-15, 20	CGR	The Chairman, The Board	●
102-24	Nominating and selecting the highest governance body	14	CGR	Nomination committee, Composition of the Board	●
102-25	Conflict of interest	20	CGR	The Board, other assignments	●
102-26	Role of highest governance body in setting purpose, values, and strategy	14-15	CGR	Board meetings	●
102-27	Collective knowledge of highest governance body	15-16	CGR	Sustainability Committee	●

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	15	CGR	Evaluation of the Board and CEO	●
102-29	Identifying and managing economic, environmental, and social impacts	7-8	SR	Strategy: Stakeholders and Materiality Analysis	●
102-30	Effectiveness of risk management processes	18	CGR	Risk assessment	●
102-31	Review of economic, environmental, and social topics	2, 8	SR	Responsibilities, Materiality analysis	●
102-32	Highest governance body's role in sustainability reporting	2	SR	About the report	●
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102-36	Process for determining remuneration	16-17	CGR	Remuneration	●
102-37	Stakeholders' involvement in remuneration	12	CGR	Division of authority	●
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102-40	List of stakeholder groups	7-8	SR	Stakeholders and materiality	●
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102-43	Approach to stakeholder engagement	7-8	SR	Stakeholders and Materiality Analysis	●
102-44	Key topics and concerns raised	7	SR	Materiality	●
102-45	Entities included in the consolidated financial statements	50	FS	Consolidated financial statements	●
<b>Reporting practice</b>					
102-46	Defining report content and topic Boundaries	7-8	SR	Stakeholders and materiality, Analysis	●
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102-48	Restatements of information	8	SR	Materiality Analysis	●
102-49	Changes in reporting	8	SR	Materiality Analysis	●
102-50	Reporting period	2	SR	About this report	●
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102-52	Reporting cycle	2	SR	About this report	●
102-53	Contact point for questions regarding the report	34	SR	Contact	●
102-54	Claims of reporting in accordance with the GRI Standards	34	SR	Contact	●
102-55	GRI content index	30-33	SR	GRI-index	●
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1) Sustainability risks are integrated in all other risk factors



Disclosure		Page	Report	Section	Status	Omission/comment
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<b>GRI 207: Tax</b>						
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207-3	Stakeholder engagement and management of concerns related to tax	6-8	SR	Strategy	●	
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<b>Management approach</b>						
103-1	Explanation of the material topic and its Boundary	8, 10-13	SR	Materiality Analysis, Global Impact - Minimize Environmental Impact, Focus Areas and Progress	●	
103-2	The management approach and its components	8, 10-13	SR	Materiality Analysis, Global Impact - Minimize Environmental Impact, Focus Areas and Progress	●	
103-3	Evaluation of the management approach	8, 10-13	SR	Materiality Analysis, Global Impact - Minimize Environmental Impact, Focus Areas and Progress	●	
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302-3	Energy intensity	11	SR	Carbon Footprint	●	
302-4	Reduction of Energy Consumption	11-13	SR	Our Carbon Management Journey, Focus Areas and Progress	●	
<b>GRI 305: Emissions</b>						
305-1	Direct (Scope 1) GHG emissions	11	SR	Carbon Footprint	●	
305-2	Energy indirect (Scope 2) GHG emissions	11	SR	Carbon Footprint	●	
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306-1	Waste generation and significant waste-related impacts	12	SR	Waste Management	●	
306-2	Management of significant waste-related impacts	12-13	SR	Waste Management, Focus Areas and Progress	●	
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Disclosure		Page	Report	Section	Status	Omission/comment
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401-1	New employee hires and employee turnover	21-25	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	21-25	SR	A fast-growing organization, Fair Compensation, Offer Sound Work Environment	●	
401-3	Parental leave	25	SR	Work/life balance	●	
<b>GRI 404: Training and Education</b>						
404-1	Average hours of training per year per employee	24	SR	Training and development	●	
404-2	Programs for upgrading employee skills and transition	24	SR	Career development	●	
404-3	Percentage of employees receiving regular performance and career development reviews	24	SR	Career development	●	
<b>GRI 405: Diversity and Equal Opportunity</b>						
405-1	Diversity of governance bodies and employees	22-23, 25	SR	Employee data, growth and diversity, diversity and inclusivity	●	
<b>GRI 413: Local Communities</b>						
413-1	Operations with local community engagement, impact assessment, and development programs	9, 12-13	SR	Local impact initiatives, Local impact	●	
<b>PRODUCTS</b>						
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103-1	Explanation of the material topic and its Boundary	8, 14-19, 26-29	SR	Materiality Analysis, Safe User Experience chapter, Safe Digital Environment chapter	●	
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103-3	Evaluation of the management approach	8, 19, 29	SR	Materiality Analysis, Focus Areas and Progress	●	
<b>GRI 416: Customer Health and Safety</b>						
416-1	Assessment of the health and safety impacts of product and service categories	14-19	SR	Safe User Experience: Responsible Gambling	●	
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	14-19	SR	Safe User Experience: Responsible Gambling	●	
<b>GRI 417: Marketing and Labeling</b>						
417-1	Requirements for product and service information and labeling	18-19	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	18-19	SR	Safe User Experience: Clear Labeling, Responsible Marketing	●	
417-3	Incidents of non-compliance concerning marketing communications	18-19	SR	Safe User Experience: Clear Labeling, Responsible Marketing	●	
<b>GRI 418: Customer Privacy</b>						
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	26-29	SR	Safe Digital Environment: Data Privacy and Protection	●	
<b>GRI 419: Socioeconomic Compliance</b>						
419-1	Non-compliance with laws and regulations in the social and economic area	14-19, 26-29	SR	Safe User Experience, Safe Digital Environment	●	



## GLOSSARY

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

## CONTACT

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