

BetMakers Technology Group Ltd

ACN 164 521 395

Supplier Code of Conduct

Acknowledgement of Country

BetMakers Technology Group Ltd (“BetMakers”) acknowledges the Traditional Custodians of the land on which we operate, live and gather as employees and workers and recognise their continuing connection to land, water and community. We pay respect to Elders past, present and emerging.

Overview

BetMakers has enterprise-wide policies and strategies to ensure that economic, social and environmental risks and opportunities are embedded into our business strategy and day-to-day operations. While our suppliers are independent entities, their business practices may impact BetMakers’ reputation. As part of our commitment to ethical business practices, it is mandatory for our suppliers to adhere to established local, national, and/or international laws, regulations, standards, and codes of conduct. These guidelines are outlined in this Supplier Code of Conduct and must be observed by all our suppliers. We take care in selecting suppliers and expect them to adhere to these standards. Suppliers are required to read, understand, and ensure that their business and supply chain meet these standards. Suppliers are required to communicate this Supplier Code of Conduct to their related entities, their own suppliers and subcontractors who support them in supplying to BetMakers.

1. Business Governance

- 1.1. Commitment to risk management and corrective action systems are key to a reliable supply chain for BetMakers. Suppliers are expected to maintain sound administration and governance processes.
- 1.2. We expect our suppliers to:
 - comply with all relevant national and local laws and regulations;
 - have a risk management framework which incorporates social, ethical, safety and environmental risks into their risk management processes;
 - have a business continuity plan to minimise business impacts in the event of major disruption;
 - engage in our process to risk assess their ability to adhere to this code;
 - be able to report on a reasonable basis on each element of this code as requested;
 - be able to support on a reasonable basis requests by BetMakers (directly or through a third party) to conduct an audit of their business practices; and
 - promote timely and balanced disclosure of material legal, ethical, social and environmental matters that may adversely impact BetMakers.

2. Labour and Human Rights

- 2.1. Our suppliers are required to exhibit a strong dedication to human rights, as well as equitable employment and engagement practices that align with both the UN Universal Declaration of Human Rights and the core conventions of the International Labour Organisation (ILO). This obligation also includes compliance with BetMakers' Modern Slavery Policy.
- 2.2. Labour Rights
 - 2.2.1. We expect our suppliers to:
 - ensure any labour provided by workers is freely chosen;
 - not engage any forced, bonded or involuntary prison labour;
 - ensure only workers with a legal right to work shall be engaged;
 - ensure workers are not required to lodge money deposits or identity papers unless required by law. Where provisions of documents are required to confirm the worker’s identity, they must be returned immediately after confirmation is completed;

- allow workers to cease providing their labour and services after providing reasonable notice; and
- encourage open communication between workers and management to resolve workplace issues without fear of reprisal, intimidation or harassment.

2.3. Child Labour

2.3.1. Child labour is not permitted in our supply chain.

2.3.2. The minimum age for providing labour and services is the higher of:

- i. the minimum age for employment in the relevant country in which the work is being performed; and
- ii. the standards set by the ILO.

2.3.3. Children under the age of 18 must not provide labour and services for any hazardous work or work that is inconsistent with the child's individual development, which may include development of a child's physical or mental health, or a child's spiritual, moral or social development.

2.4. Freedom of Association and Collective Bargaining

2.4.1. We expect our suppliers to:

- allow workers the right to join (or not join) or form trade unions and to bargain collectively; and
- not discriminate against workers' representatives who carry out their lawful representative functions in the workplace.

2.5. Working Hours, Wages and Benefits

2.5.1. We expect our suppliers to:

- comply with local laws and regulations in respect of working hours, wages, superannuation, benefits, leave entitlements, public holidays and compensation insurance for workers;
- provide workers with clear and understandable information about the terms of their engagement before they commence work;
- ensure workers receive a fair wage that is enough to meet basic needs and to provide some discretionary income;
- provide workers with wage slips or equivalent details for the pay period each time that they are paid;
- allow workers to work hours that are reasonable and that do not endanger the health and safety of the worker, their fellow workers or any member of the public; and
- allow overtime work to be voluntary, not excessive and paid in accordance with local laws and regulations.

2.6. Anti-Discrimination

2.6.1. Suppliers are required to ensure there is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

2.7. Harsh or Inhumane Treatment

2.7.1. It is mandatory for suppliers to guarantee the prohibition of physical abuse, the act of threatening with physical abuse, sexual or other forms of harassment, and verbal abuse or other forms of intimidation.

3. Occupational Health & Safety

3.1. BetMakers is committed to the health and safety of our workers, customers, contractors, visitors and suppliers.

3.2. We expect our suppliers to:

- comply with health and safety laws, regulations, standards and appropriate codes of practice in the country where workers are engaged;
- take reasonable steps to prevent accidents and injury in the working environment;
- provide a safe and hygienic working environment. This includes access to clean toilet facilities and clean and drinkable water. Accommodation for workers, where provided, shall be clean, safe and meet the basic needs;
- provide all necessary supervision, training, instruction, equipment, resourcing and information to all workers;
- where applicable, provide personal protective equipment for use by workers;
- ensure safeguards on machinery meet or exceed local laws; and
- assign a senior management representative to be responsible for health and safety.

4. Environment

4.1. BetMakers prioritises sustainable business practices within our organisation. To that end, we have implemented a focused program aimed at reducing carbon emissions, energy consumption, and fuel costs. Additionally, we strive to procure goods and services that have minimal impact on the environment, further demonstrating our commitment to sustainability.

4.2. We expect our suppliers to:

- actively avoid harming, and seek to protect the environment in which they operate;
- embed environmental management principles within business operations;
- strive to continuously improve environmental and resource management in all aspects of their operations;
- strive to use renewable energies and promote energy efficiency across all aspects of their infrastructure, including data centres (as applicable);
- support BetMakers' environmental targets for waste and reducing Greenhouse Gas (GHG) emissions; and
- measure, monitor and report on environmental data in accordance with local and national laws and regulations.

5. Business Integrity

5.1. Our procurement decisions are always made with the best interests of our organisation and customers in mind. Suppliers are considered a fundamental part of our business operations and are therefore expected to conduct themselves with the highest level of ethical standards. This includes demonstrating honesty, transparency, and trustworthiness in all their dealings with others.

5.2. Conflicts of interest

5.2.1. Suppliers are required to avoid actual, potential or perceived conflicts of interest with BetMakers employees and contractors. If they occur, the supplier must notify BetMakers via email at: au.compliance.officer@betmakers.com so that appropriate steps can be taken to manage the conflict.

5.3. Bribery and Corruption

5.3.1. Australia has comprehensive laws and regulations in place prohibiting corrupt behaviour including bribery of a foreign official, embezzlement, money laundering and extortion. Any person or company who commits bribery, or associated offences, within or outside Australia, can be prosecuted.

5.3.2. We expect our suppliers to:

- comply with all anti-bribery and anti-corruption laws and regulations applicable to their operations;
- comply with all anti-money laundering and counter terrorism financing obligations applicable to their operations;
- not engage in bribes, pay-offs, kickbacks or any other inappropriate benefits, whether directly or indirectly, no matter how large or small in value; and
- adhere to the above even if it is legal or common practice in another country outside of Australia.

5.4. Gifts, Benefits & Hospitality

5.4.1. Suppliers must not offer or receive gifts, benefits and hospitality that:

- could inappropriately influence, or be perceived to inappropriately influence, the outcome of business transactions; or
- can be perceived to obtain any unfair or inappropriate advantage.

5.4.2. Any hospitality offered to BetMakers employees, contractors, agents or representatives must be limited to reasonable business courtesies.

- where practical, prior approval from the BetMakers CEO, Coo or CFO is required for any gifts, entertainment, or hospitality exceeding \$750 in connection with the company, and such transactions must be accurately disclosed to the company's board of directors each quarter.

5.5. Trade Controls

5.5.1. Suppliers are obligated to adhere to all relevant laws and regulations pertaining to trade controls, sanctions, export and re-export, and imports. This includes laws and regimes established by Australia, the United Nations, and other countries as appropriate.

6. Concerns & Whistleblowing

6.1. We are committed to an environment where our suppliers, their employees and subcontractors can raise concerns about any actual or suspected breach of this code.

6.2. Suppliers, their employees and subcontractors can raise concerns with:

- their BetMakers point of contact, or
- via email to au.compliance.officer@betmakers.com

6.3. If a supplier, their employees or subcontractors (or family relations of individuals within these groups) does not feel comfortable raising their concerns via these channels, they can report any actual or suspected breaches of this code through our formal whistleblower process via the Whistleblowers Protection Officer at +61 3 9614 2444 or via email to: charly@cdplus.com.au

7. Review and Changes To This Charter

7.1 The Board will periodically review this code to check that it is operating effectively and whether any changes are required to the code.

7.2 The Board may change this code of conduct from time to time by resolution.

8. Approved and Adopted

8.1 This supplier code of conduct was approved and adopted by the Board on 10/10//2023