# UNLOCK OUR SUSTAINABLE FUTURE

2024 ESG Report

# GAMING<sup>1</sup>





LEARN MORE ABOUT OUR COMMITMENTS



**G** 2024 ESG Report

1

# **Table of contents**

ENVIRONMENTAL

 $\mathbf{18}$ 



- **02** → About this report
- $03 \rightarrow$  Message from our management
- **04** → About GAMING1
- 06 → Ourvalues
- $08 \rightarrow$  An actor anchored in the Walloon community
- 10  $\rightarrow$  Our 2024 ESG highlights
- 12  $\rightarrow$  United Nations Sustainable Development Goals
- 70 → Appendices

SOCIAL

# About this report

This third ESG report from GAMING1 is a chance to evaluate our environmental, social and governance performance for the period from 1 January to 31 December 2024. For the first time, it covers the entire consolidated Group, including both our online operations and our gaming establishments on a national and international scale.

Over the last three years, we have adopted a progressive approach to optimize information collection and ensure the analysis is as complete and efficient as possible. Furthermore, in anticipation of the requirements of the European directive on corporate sustainability reporting (CSRD), we have already integrated certain key elements into our communication strategy. These include the double materiality assessment, which allows us to identify the biggest sustainability challenges for GAMING1, taking into account both their social and financial implications.

The key themes include player protection, climate change, staff well-being and corporate culture, which reflect our ambition to limit our environmental impact, become a world leader in responsible gaming and be an employer committed to offering an innovative and stimulating work environment that supports the well-being of its staff members.

i < 🖙

# Message from our management

2024 marks a new milestone in our ESG commitment. A commitment that we wanted to broaden, intensify and further integrate in a process of continuous progress, at the service of both our ecosystem and society as a whole.

At GAMING1, we have always believed that economic

growth cannot be achieved without responsibility. It is with this in mind that we have continued our efforts on the two pillars that are most important to us: social issues – with a particular focus on addiction – and governance, where we continue to build bridges between our sector and the political and economic world.

In terms of prevention, 2024 was a year of strengthening. We have set up new partnerships with Belgian universities

to advance scientific research on addiction mechanisms and to better understand the levers of healthier, more responsible gaming. These collaborations directly fuel our ambition to become a leading player in the development of advanced technological tools for responsible gaming. In this respect, our acceleration in the implementation of artificial intelligence opens up concrete and exciting prospects: Al, put at the service of prevention, can become a real lever for positive impact. In governance, we have chosen openness. This requires greater transparency, but also enhanced dialog with decision-makers. Welcoming political and economic leaders to our offices in Guillemins and showing them our professions, teams and technologies is our way of deconstructing preconceived ideas and showing, with supporting evidence, the maturity and seriousness of a sector that is often caricatured.



WE ARE FORTUNATE AT GAMING1 TO BE ABLE TO INVEST, INNOVATE AND BUILD A FUTURE WHERE TECHNOLOGY SERVES ETHICS, NOT THE OTHER WAY AROUND. This dialog is also taking place in a changing political context. In Belgium, the shift of responsibility for gaming from the Ministry of Justice to the Ministry of the Economy has paved the way for a more rational, more informed approach to our activity. We welcome this change which, although it does not guarantee a smooth path, creates a more constructive climate to achieve our responsible ambitions.

Internationally, the picture isn't as clear. Today, in some regions of the world, we are seeing the emergence of trends that tend to question the place of ESG in corporate strategies. This way of thinking currently still held by a minority could eventually weigh on global standards. However, it reinforces our conviction that responsibility must not be a short-term luxury, but a structural requirement.



We are fortunate at GAMING1 to be able to invest, innovate and build a future where technology serves ethics, not the other way around. We want to seize this opportunity to the fullest. Because beyond the indicators, beyond the labels, it is the choices we make today that will shape the legitimacy of our sector tomorrow.

And that, without a doubt, is the greatest challenge of ESG: aligning performance with long-term responsibility.

## NICOLAS LÉONARD

Board Member - Chief Strategy Officer

(3)

nental

Social

Governance

Appendices

# About GAMING1

Founded in 1992, the GAMING1 Group was born in the heart of Liège with entertainment and leisure at the center of its activities. Over the years, the Group extended its reach beyond the Belgian borders with a strong presence in other countries such as France, Switzerland, Portugal, the Netherlands and Spain.

The Group's activities are divided into three main pillars:

- **Digital Gaming** groups together 17 casino and sports betting websites distributed over several countries, as well as a leading technological department for the platform and the development of online games based in Liège. The digital skill center offers all B2B and B2C digital services.
- Landbased Gaming describes the gaming activities in our establishments and includes the Spa and Namur casinos, 30 gaming halls in Belgium, 7 casinos and a poker club in France, as well as 2 casinos in Switzerland.
- Entertainment activities are also part of the GAMING1 Group's activity, such as the Circus bowling alley, the ODDS establishments and the Circus Casino Resort hotel in Namur, which opened in 2022.

# **Our mission**

We are committed to offering a fun and secure gaming experience, adapted to regulated marketing, while promoting responsible gaming. To do this, we utilize cutting-edge technology, including proprietary technology, as well as a solid physical and affiliated network allowing us to innovate and set ourselves apart on the national and international stage.

# A strong and committed Group

In 2024, the GAMING1 Group was made up of 1,361 staff members, including 374 in the Liège hub and 31 in the Malta hub. Together, we achieved a turnover of €480 million, demonstrating our stability and long-term commitment.



THE ADVENTURE BEGINS



This map shows the countries in which we operate. Scan the QR code to see our brands categorized by country and broken down between online and landbased activities.

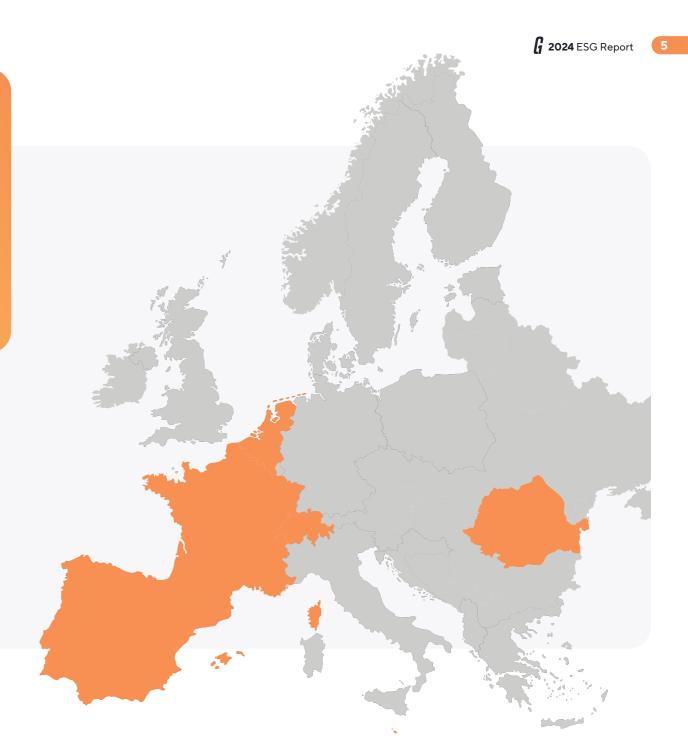
DISCOVER OUR BRANDS HERE











ntal Social

Governance

Appendices

# **Our values**

At GAMING1, our identity is based on five essential values that guide our vision and mission for customers and staff members alike. They shape our corporate culture and define how we interact on a daily basis.

## **TEAM SPIRIT**

Collective strength is at the heart of our success. Working together with a common goal strengthens cohesion, stimulates innovation and creates a positive work environment. By favoring collaboration and mutual support, we advance more efficiently and take on each challenge with enthusiasm.



# INTEGRITY

We believe that making mistakes is part of learning, but we must recognize and take responsibility for them. Integrity guides our actions and decisions, guaranteeing exemplary behavior towards our colleagues, partners and customers. We place ethics, transparency and respect at the center of our professional interactions.



7

# PERFORMANCE

We're driven by excellence. We're constantly looking to outperform ourselves, optimize our processes and offer first-class gaming experiences. Our ambition is to reach the highest standards of quality, innovation and efficiency for the benefit of our customers and our teams.

## **BOLDNESS**

At GAMING1, we encourage everyone to think outside the box, suggest ideas and dare to innovate. Taking initiative and exploring new approaches is part of our DNA. This boldness is what allows us to constantly evolve and push our limits.

# PLEASURE

We do more than offer entertainment: we cultivate pleasure in our daily business. The passion that drives us, the pride we take in our achievements and the quality of the relationships we build are all sources of motivation that fuel our commitment and energy.





Social

Governance

**Appendices** 

Proud of its roots in Liège, GAMING1, an entity of the Ardent Group, actively and responsibly contributes to the development of the Walloon economic fabric, with €32 million in taxes on gaming in 2023 and 1,000 jobs in Belgium. But our impact goes much further than that! Again this year, we have led several initiatives and organized various events to support socio-cultural causes and local sport.



# March **OPÉRATION ARC-EN-CIEL**

From the start of the year, we organized a collection of non-perishable food to support underprivileged children. This initiative aims to promote access to educational and active leisure activities for young people from working-class institutions.



June

# **ARDENTAWARDS**

This year, an unprecedented tie allowed us to reward not 5, but 6 Liège-based nonprofit organizations, each receiving a €10,000 grant to make their project a reality. Besides this financial aid, the winners also enjoyed press coverage (Sudinfo, 7Dimanche). And because each initiative is important, each of the 25 nominated nonprofit organizations received a €1,250 donation.

# An actor anchored in the Walloon community

# May **CIRCUS CUP**

Alongside Standard de Liège, we contributed to the organization of this exceptional match bringing together 28 local and international football legends including Del Piero, Davids and Fellaini. The entire proceeds from ticket sales totaling €115,600 were given to Seraing, a town located on the outskirts of Liège, to support amateur sport.



9

# **7**Cup



# 7CUP

In 2024, the 7Cup quickly established itself as one of the biggest amateur seven-a-side football events in Belgium. The competition culminated in a friendly and festive final at the ING Arena, celebrating passion for sport, team spirit and the vitality of amateur football across the country.



# **DAY OF VOLUNTEERING**

Eight of our employees gave their time to lend a hand at the Liège Resto du Cœur. They helped serve breakfast, prepared food parcels and had enriching conversations with the volunteers working for the nonprofit organization.

#### June

## **FAMILY DAY**

We opened the doors of our Liège hub to welcome the families of our staff members in a fairytale universe inspired by Alice in Wonderland. This event was also an opportunity to highlight local organizations such as La Lumière, Surdimobile, Honey Honey, Entrevues, Live in Colors, Défil'éco, Assistance à l'Enfance, Impro'Jeux and Cap Event through fun and educational activities.



## November

# **CHARITY POKER TOURNAMENT**

Like every year, our poker tournament at the Circus Casino Resort de Namur brought together the Group's staff members for a good cause. In 2024, we set a new record with 240 participants and  $\in 8,175$ collected in aid of Restos du Cœur Belgique, an essential organization for people living in poverty.

## November



# All year round BLOOD DRIVE

Every quarter, we organize blood donations in collaboration with the Red Cross. In 2024, 77 life-saving pouches of blood were collected. A huge thank you to our generous donors!



Social Governance

Appendices

# Our 2024 ESG highlights

SILVER | Top 15% ecovadis Sustainability Rating NOV 2024

# **EcoVadis**

For the third consecutive year, GAMING1 was awarded the silver medal for its ESG strategy, ranking it among the best 9% of companies evaluated worldwide.



# **Top Employer**

GAMING1 has had the privilege of being recognized as a Top Employer for more than four years. Proud of keeping our place among the best, we obtained exceptional results this year thanks to our commitment to promoting an inclusive, innovative and ethical work environment.



# ROBIN



Our responsible gaming tool has been reborn as ROBIN, which is the abbreviation for *Risky Online Behavior Indicator.* ROBIN is a real gaming companion: a source of advice and a trustworthy guide for players. **What is its goal?** Make responsible gaming clear and accessible by offering personalized recommendations tailored to each player's activity to help them keep control of their gaming.

# 

This year we launched our first ESG Week. A week where our staff members had the opportunity to take part in events focused on well-being, protecting the environment and supporting charities, complete with awareness-raising messages. An engaging and friendly way to make a difference together!

# 2024 carbon footprint assessment

For the third consecutive year, we have measured GAMING1's carbon footprint. After gradually expanding the scope of our analyses, for the first time this new assessment includes all of our operations, both online and in our gaming establishments, in Belgium and internationally, without exception. This is the most comprehensive and representative carbon footprint assessment ever carried out by our Group.

ital Social

Governance

**Appendices** 

# **Double materiality** assessment

Methodology for identifying and evaluating the impacts, risks and opportunities of materiality

In 2024, we completed a double materiality assessment, in compliance with ESRS 1 requirements, for the second time. This allowed us to identify the most relevant sustainability challenges for the GAMING1 Group as a whole.

This evaluation covered the impact of our activity on society and the environment (impact materiality) and the manner in which sustainability topics influence the Group in terms of economic risks and opportunities (financial materiality). The results will be reviewed every year. Our analysis started by combining the list of sub-subtopics defined by ESRS 1 with the specific challenges facing our sector. We also adopted an "outside-in" approach by consulting our stakeholders and value chain partners.



# A structured approach to defining our ESG priorities

In 2024, we conducted an in-depth assessment of our ESG issues based on the European Sustainability Reporting Standards (ESRS). This approach was broken down into seven key stages, combining internal analysis and dialog with our stakeholders:

- Defining our scope of action by identifying the major ESG issues linked to our offices, online activities and gaming establishments;
- 2. Selecting relevant topics by cross-referencing ESRS 1 with the results of our 2023 analysis;
- **3.** Structuring the topics around the three ESG pillars: Environmental, Social and Governance;
- 4. Assessing and prioritizing impacts using an analysis matrix: 12 key topics were selected, while the others have a non-material impact on our business;
- Getting stakeholders involved via questionnaires sent to staff members, players and management;

- Submitting the results of this assessment to management for approval;
- 7. Continuing the dialog by gradually extending the consultation to our partners and the authorities.

This rigorous method ensures that our ESG strategy is in line with the actual expectations of our stakeholders and the specific issues of our sector.



Social

Appendices

## INTERACTION WITH STRATEGY AND BUSINESS MODEL

The results of our double materiality assessment reflect GAMING1's strategy and business model. Our social impacts linked to entertaining our players prompt us to offer a competitive and responsible experience.

This is why we operate exclusively on 100% regulated markets, thereby guaranteeing compliance with regulatory requirements and a secure gaming experience for users within a clear framework. For an overview of our operations, please scan the QR code on page 5, under the "Our Brands" section.

To remain an attractive and relevant employer, we depend on the well-being of individuals, both within and outside the company. This commitment is essential for encouraging innovation and continuing our development in the sector.

The results of our analysis also highlight our limited environmental impact, due the largely digital nature

> ETHICS AND TRANSPARENCY ARE FUNDAMENTAL VALUES OF OUR CORPORATE CULTURE.

of our activity. However, ever conscious of the challenges linked to climate change, we are actively committed to minimizing our carbon footprint and adopting ever more responsible practices.

Governance

Finally, ethics and transparence are fundamental values of our corporate culture. In a strictly regulated sector, we operate under demanding regulations established by gaming authorities, thereby guaranteeing a responsible and equitable approach.



## INTEGRATING SUSTAINABILITY INTO OUR STRATEGY

To evaluate the resilience of our strategy and business model, sustainability is fully integrated into our annual strategy review. Our ESG Committee comprising members of the Board of Directors meets every year to define our ESG roadmap by analyzing strategic short and long-term risks and opportunities to ensure we meet society's expectations at all times. The discussions notably include assessing our ESG ratings, prioritizing sustainability challenges and monitoring policies.

Our strategic thinking is based on contributions and recommendations from across the organization, as well as from external stakeholders. We pay particular attention to subjects that are likely to have an impact on our long-term vision and emerging trends, which may lead to strategic adjustments where necessary.

Sustainability is also integrated into key functional strategies and covered by regular discussions with executive management.



ental

Social

Governance

Appendices

# **United Nations Sustainable Development Goals**

The Sustainable Development Goals (SDG) adopted by the United Nations in 2015 aim to foster a sustainable future for the planet and its inhabitants by 2030. The 17 goals cover the major economic, social and environmental challenges, encouraging governments, companies, NGOs and all social actors to tackle urgent worldwide challenges such as poverty, inequality, hunger, access to education and climate change. The objective is to create a world that is fairer, more inclusive and more respectful of the environment.





DISCOVER THE 17 GOALS



🔓 2024 ESG Report

# What are the goals on which GAMING1 can have the most significant impact?



GAMING1 strives to provide a safe and responsible gaming environment for players while supporting the physical and mental well-being of staff members by engaging with associations and sports clubs in order to contribute to the well-being of society.



We embrace responsible consumption while pursuing a bold roadmap designed to reduce our carbon footprint and combat climate change.



We offer staff members a caring and stimulating work environment, competitive salaries and fulfilling professional development opportunities.



We ensure an ethical and compliant gaming environment by actively combating fraud, money laundering and illegal practices while respecting applicable regulations in all the countries in which we operate.



We invest in sustainable buildings in order to contribute to the development of high-quality infrastructure. We support scientific research while strengthening our technological capabilities to perfect our products and, above all, guarantee security for our users.



Introduction

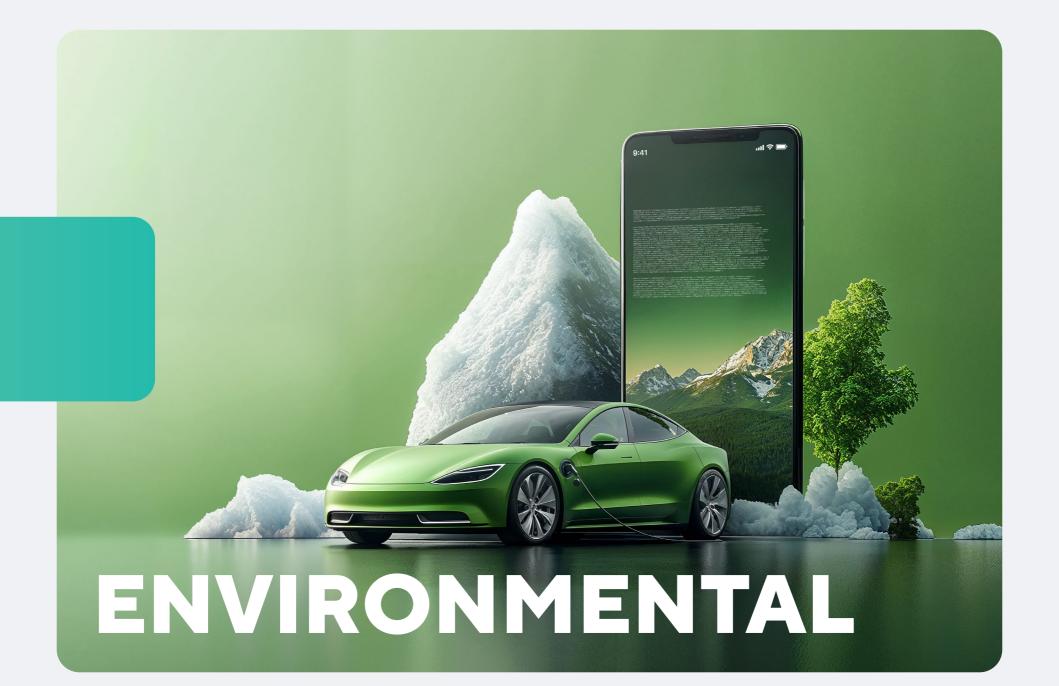
Environmental

Social Governance

Appendices

# CLIMATE CHANGE

As a company that offers gaming experiences, both online and in our gambling and sports betting establishments, GAMING1 is fully aware of its impact on the climate and environment. We rigorously evaluate this impact via our carbon footprint assessment and are committed to reducing it through our decarbonization roadmap - because sustainability is no longer an option, it is a necessity. Although we are not among the most polluting industries, we aspire to be innovators in our sector and actively contribute to a more responsible future.



Governance

Social

Appendices

# Evaluation of our environmental impacts, risks and opportunities



# 3. VULNERABILITY TO THE EFFECTS OF CLIMATE CHANGE ON OUR OPERATIONS AND INFRASTRUCTURE

#### RISKS

- Damage to our establishments, offices and data centers following a natural disaster
- Reduced footfall on days with unfavorable weather conditions
- Risks linked to our reputation if we fail to act
- Financial repercussions

#### **OPPORTUNITIES**

- Increased attractiveness for investors by fulfilling ESG requirements
- Product and technology innovation via more sustainable solutions
- Strengthening the company's reputation and stakeholder trust
- · Long-term cost reduction due to improved resilience
- Tax advantages through incentives for sustainable companies

# Identification process for impacts, risks and opportunities

To identify our climate impacts, we carry out a full carbon footprint assessment based on the GHG Protocol by tracking our direct and indirect greenhouse gas (GHG) emissions as well as our energy consumption across all our sites. This analysis allows us to precisely measure our carbon footprint and identify the main sources of emissions. We also evaluate the current and potential climate impacts of our activities in order to guide our actions in line with our corporate strategy and decarbonization roadmap. By integrating this data into our decision-making processes, we are committing to reducing our environmental impact and strengthening our resilience to climate challenges. Social Governance

# **Our commitment**

GAMING1 is fully committed to the fight against climate change with the ambitious goal of achieving carbon neutrality by 2050, in line with the Paris Agreements and the aim of limiting global warming to 1.5°C compared to pre-industrial levels.

We have defined a bold roadmap associated with tangible actions and have joined the Science Based Targets initiative (SBTi) in order to align our objectives with the most stringent scientific standards. In the short term, we will finalize our SBTi targets, which will be integrated into our ESG strategy and will allow us to monitor and adjust our progress.







Social Governance

Appendices

# Actions and transition plan to mitigate climate change

In 2025, GAMING1 is committed to delivering a decarbonization roadmap setting out emission reduction targets for each scope, with the aim of achieving carbon neutrality in the long term. This approach will be based on prior validation of our short-term objectives by the Science Based Targets initiative (SBTi).

Aligned with our business strategy and growth trajectory, the roadmap will structure our sustainability efforts. Meanwhile, we have already launched a number of grassroots initiatives to protect biodiversity and the environment at local level: 66 with a view to

MITIA VIEW 10 MITIGATING OUR IMPACT ON CLIMATE CHANGE, GAMING1 IS COMMITTED TO PRESENTING A DECARBONIZATION ROADMAP IN 2025.

## **URBAN CLEAN-UP**

This summer, GAMING1 rallied its teams for a Clean-Up Day in the Guillemins district, in partnership with Be WaPP. The result: 14 bags of waste collected in two hours. A simple but meaningful action in favor of a cleaner living environment and a more sustainable planet.





# 

GAMING1 FAMILY IN 2024

## **BEE HIVES**

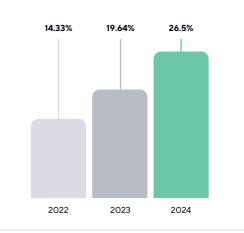
GAMING1 has installed 40,000 bees on the roof of its Liège hub through a partnership with Burbee. Even in cities, these pollinators play a key role in local biodiversity by supporting plant flowering and reproduction. A sustainable initiative that raises awareness about protecting ecosystems.

## **BATTERY COLLECTION POINT**

In collaboration with Bebat, GAMING1 has installed a battery collection point accessible to everyone in the building. The goal is to facilitate recycling, limit toxic waste and preserve precious resources such as lithium and cobalt.

# **PROMOTION OF SOFT MOBILITY**

Located close to public transport, our head office encourages eco-responsible travel. We are gradually transitioning to electric vehicles for our fleet, as well as providing electric bikes for short trips. Practical solutions to reduce our staff carbon footprint.



#### Percentage of hybrid/electric vehicles in our fleet

Social Governance

## **MOBILITY PLAN**

In Belgium, GAMING1 offers eligible staff members the opportunity to swap their thermal-engine vehicles for a mobility budget. This flexible system allows them to opt for more sustainable solutions such as public transport, shared mobility, cycling or housing close to the office. Having already been adopted by 51 employees, the plan aims to reduce emissions linked to business travel.

# STRENGTHENING OUR RESPONSIBLE PURCHASING POLICY

In 2024, we launched our Supplier Code of Conduct, setting environmental, ethical and social criteria. Signed by a first set of partners, the Code binds all signatories to respecting our values. From 2025, our teams will be trained in sustainable purchasing in order to strengthen our approach and work alongside partners who share our vision of sustainability.





BREEAM CERTIFICATION ASSESSES A BUILDING'S ENVIRONMENTAL PERFORMANCE

# END OF PHYSICAL GIFTS OFFERED BY OUR CIRCUS CLUB

GAMING1 has stopped sending physical gifts through its Circus Club, thereby avoiding nearly 1,800 tCO<sub>2</sub>e of emissions. Renamed "Extra Payout" on Circus.be, the program now allows players to convert their points into cash that is sent directly to their Wallet. An important decision for limiting our environmental impact.

# **ENCOURAGING REMOTE MEETINGS**

Having held over 58,000 remote meetings in 2024, we are relying on virtual collaboration to limit travel. Underpinned by a 50% remote working policy, this approach combines team flexibility with reducing our carbon footprint.

## **OUR SUSTAINABLE BUILDINGS**

Our head offices in Liège and Malta are located in BREEAM-certified buildings rated "Very Good", a guarantee of high environmental performance. This certification reflects our commitment to working in sustainable spaces combining energy efficiency, air quality and responsible resource management.

## "PAPERLESS" PHILOSOPHY

We are continuing our transition to becoming "paperless" by digitizing our processes, particularly by adopting electronic signatures with DocuSign. In 2024, this allowed us to save more than 53,000 sheets of paper, the equivalent of 42,000 liters of water and 1.7 tons of wood.

# MOTION SENSORS AND LED LIGHTING

In our hubs, motion sensors automatically turn off LED lights in unoccupied spaces, thereby limiting energy waste. Our gaming establishments are also equipped with LEDs for the most part, a choice that is both sustainable and economical in line with our energy efficiency strategy.

# REDUCING WASTE IN EVERYDAY LIFE

We have installed water fountains on every floor and provided reusable water bottles to all staff members. Sustainable tableware is also available in all kitchens to limit the use of disposable items.



58,210 remote meetings 1,781 tCO20 reduction across scope 3 53,674 SHEETS OF PAPER SAVED

STAFF MEMBERS ADOPTED THE MOBILITY PLAN Social Governance

Appendices

# Our commitments for a more sustainable future

At GAMING1, we are making a tangible commitment to the ecological transition. Our approach is based on targeted and measurable actions with clear objectives for 2030.

#### 1. Cleaner mobility

We are aiming for our fleet to be made up of 80% electric or hybrid vehicles by 2030. Thanks to the mobility budget launched in 2024 and already adopted by many staff members, this proportion has reached 26.5%, compared to 19.64% in 2023.

#### 2.100% green energy

From 2027, we will shift to an all-renewable electricity contract for our operations in Belgium, with the aim of extending this transition to all our sites across Europe.

#### 3. Responsible purchasing

We have rolled out a Supplier Code of Conduct to ensure our partners are in line with ethical, social and environmental standards. By 2027, 50% of our purchasing capital will have to adhere to this Code.

#### **4.** Scientifically approved carbon trajectory By joining the SBTi, we are committing to

setting an emissions reduction target by 2025 that is consistent with the Paris Agreement and the 1.5°C limit on global warming.

#### 5. A roadmap to carbon neutrality

We will finalize our decarbonization roadmap in 2025, including tangible measures and specific targets to achieve carbon neutrality in the long term.



For the third consecutive year, we measured GAMINGI's carbon footprint, this time expanding the analysis to all of our operations, including our casinos in France and Switzerland.

This 2024 assessment, our most comprehensive to date, allows us to precisely identify our main sources of emissions: purchases of products and services, energy consumption and the use of thermal vehicles.

In light of this assessment, we are deploying targeted actions: training staff in responsible purchasing, installing solar panels (already in place in Namur), gradually transitioning to 100% green electricity and converting our fleet to 80% electric or hybrid vehicles by 2030.



# **PROGRESS ON ENERGY CONSUMPTION**

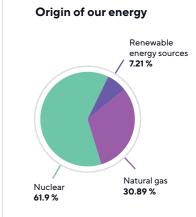
In 2024, our energy consumption increased by 128.6%, mainly due to the inclusion of our establishments in France and Switzerland in our reporting scope for the first time.

This increase also reflects the more precise and centralized data collection in Belgium made possible by harmonization among our suppliers. Increased transparency in order to better manage our energy transition.

	2022*	2023**	2024
Total energy consumption of our own operations	428,101.6 kWh	6,911,894.87 kWh	15,799,517 kWh
Total renewable energy consumption by our own operations	0 kWh	46,208.7 kWh	1,139,957 kWh

\* Calculated for our online operations and head office

\*\* Calculated for our online operations, gaming establishments in Belgium and head office





l Social

Governance

Appendices

# PLAYER PROTECTION AN RESPONSIBLE GAMING

At GAMING1, we offer an entertainment experience above all else, whether online or in our casinos and gaming halls.

Our ambition is to create opportunities for fun and escape. However, we are aware that gaming can entail certain risks of addiction. That is why prevention and consumer protection are among our priority commitments.



Governance

Social

**Appendices** 

# Evaluation of impacts, risks and opportunities related to player protection

# **1. PROTECTION OF PRIVACY**

#### RISKS

- Data leak compromising the confidentiality of personal information
- Cyberattacks threatening system integrity and availability
- Increasingly strict regulations with significant impacts on compliance, innovation capacity and, consequently, economic performance
- Legal risks leading to potential prosecution and financial penalties
- Potential closure of certain operations in the event of non-compliance

## **OPPORTUNITIES**

- Strengthening our resilience against digital threats by improving our cybersecurity and data protection practices
- Ensuring an online environment that complies with regulatory requirements and provides security and data protection for consumers

# 2. EFFECTS ON PLAYER HEALTH AND WELL-BEING

## RISKS

- Potential legal action in the event of regulatory non-compliance
- Damage to the company's reputation if our commitments to responsible gaming are not sufficiently visible and effective

## **OPPORTUNITIES**



- Increased awareness of this issue
- Strong positioning as a responsible actor and sector benchmark in terms of prevention and player protection
- The assurance of operating exclusively on regulated markets, a guarantee of reliability and compliance

# **3. OBTAINING A SAFE GAMING EXPERIENCE**

## RISKS

• Failure to anticipate regulatory changes could impact our operations

• Risk of legal action if protective measures are not sufficiently aligned with current standards

#### **OPPORTUNITIES**



• An improvement in the overall player experience, strengthening player satisfaction, engagement and loyalty

• A more participatory approach by factoring player feedback into the continuous improvement of our products and services

• A lever for innovation to develop advanced analysis and prevention technologies, in order to better manage and limit the risks of online gaming addiction



Social

Governance

Appendices



# GAMING1: a firm commitment to protecting our players

Player protection is a central focus of our strategy. While entertainment remains our priority, we are aware of the risks associated with excessive gaming and fully assume our ethical responsibility.

As a signatory to the Duty of Care agreement via BAGO (Belgian Association of Gaming Operators), GAMING1 is committed to creating a healthy and safe gaming environment by:

- Detecting any changes in behavior that may indicate a risk;
- Proactively alerting affected players;
- Overseeing player practice using accessible moderation tools.

Gaming1 provides players with the necessary means to play responsibly and avoid developing problematic behaviors.



## A LEGAL AND SECURE FRAMEWORK FOR PLAYERS

We actively work to protect players by ensuring that our offering falls within a strict legal framework. As a member of BAGO, our CEO Emmanuel Mewissen works alongside the Belgian Gaming Commission to promote responsible and regulated gaming.

The Belgian framework lays out clear rules against illegal gambling, including:

- The prohibition of any activity related to unlicensed games of chance;
- A regularly updated blacklist in order to block access to illegal sites.

These unregulated platforms do not guarantee players' protection (minimum age, deposit limits, framework regarding bonuses) or their financial or legal security. Conversely, we are committed to providing a regulated, responsible and legally compliant service.

## COMMITMENTS TO REGULATED MARKETS

We operate exclusively in regulated jurisdictions, both in Belgium and internationally. By strictly adhering to the applicable legal frameworks, we contribute to a safer, more transparent and more responsible gaming sector, serving players and ensuring their protection.

## DATA PROTECTION AND CYBERSECURITY

The security of our players' personal data is one of our top priorities. We are fully GDPR-compliant, ensuring that everyone has full control over their information. Meanwhile, we are continuously strengthening our cybersecurity system to ensure data confidentiality and integrity throughout the gaming experience.



Emmanuel Mewissen, Vice President of BAGO and CEO of GAMING1

66

BY SCRUPULOUSLY RESPECTING THE LEGAL FRAMEWORKS IN FORCE, WE CONTRIBUTE TO A SAFER AND MORE RESPONSIBLE GAMING SECTOR, GUARANTEEING PLAYERS A CLEAR AND PROTECTED ENVIRONMENT.



Governance

Appendices

## **Our** actions

## **DUTY OF CARE**

## At GAMING1, the implementation of the Duty of Care is based on three pillars:

#### 1 Moderation tools

Players should be able to moderate their gaming activity using configuration tools directly accessible on the interface. These tools include:

- Deposit limits
- Loss limits
- Stake limits
- Break periods
- Self-exclusion
- Setting gaming time
- Notification of gaming time
- Limit by stake (planned for 2025)
- Exclusion by game type (planned for 2025)

A comprehensive catalog of moderation tools is essential to the responsible gaming strategy, allowing the player to apply the measures most appropriate to their situation. Currently, 90.98% of our online players in Belgium and the Netherlands use these features, either due to local legal requirements that automatically impose certain limits, or voluntarily.

#### 2 Awareness-raising

Our awareness strategy is aimed at both internal stakeholders (staff members) and external stakeholders (players).

#### Internal awareness

GAMING1 demonstrates its commitment to responsible gaming through dedicated governance, with specialized teams and experts (Responsible Gaming Manager, Responsible Gaming Analysts).

A mandatory training program is available to all staff members, organized in three levels:

- Awareness training: e-learning course for all staff members
- Intermediate training: for staff in direct contact with players (customer service agents, VIP managers, gaming hall staff)

• Advanced (certified) training: provided by external experts for teams dedicated to responsible gaming

Internal communications include "Responsible Gaming Talk About" sessions and a newsletter featuring concrete examples of responsible gaming non-compliance.

The Responsible Gaming team also works closely with the marketing department to ensure that campaigns:

- · Fully comply with regulatory obligations;
- Are carried out responsibly, taking into account player awareness and protection.



## **Informative** Risque faible

#### Joueurs récréatifs

Les joueurs récréatifs (0) sont des joueurs qui jouent occasionnellement, dans un but de divertissement.



## **External awareness**

Players must be aware of their gaming activity at all times.

This is ensured by:

- Sections dedicated to responsible gaming on the player interface;
- Generic and personalized communications sent by email;
- Direct interventions via customer service and the Responsible Gaming team;
- A personalized activity report.

Finally, from a corporate standpoint, our responsible gaming strategy directly influences our reputation and compliance in the eyes of regulators.

### 3 Proactive detection technology

Targeted communications about responsible gaming and tailored recommendations for players can only be truly effective with the support of advanced analytical technology.

This is why, a few years ago, in collaboration with Dr. Xavier Noël - a renowned psychologist and addiction specialist at the Université libre de Bruxelles -GAMING1 developed an innovative tool based on artificial intelligence to detect problematic online gaming behavior.

This prevention system analyzes and identifies indicators of risk behavior based on players' habits and legally recorded data by operators. It takes into account several key parameters, such as time spent playing, amounts wagered, session frequency and betting patterns. Using artificial intelligence, this data is analyzed to assess the player's risk profile on a scale of 0 to 5.

The system, which has been operational since 2019 and is constantly being updated, works by automatically triggering an alert when risk behavior is detected, allowing our Responsible Gaming team to intervene proactively and support players as needed.



Environmental

Social

Appendices



Governance

Level	Player type	Type of approach	Specific communication	Player monitoring
0	Recreational player	Informative and automated	General awareness-raising	Automatic: reminder every 6 months
1	Recreational player	Informative and automated	General awareness-raising	Automatic: reminder every 6 months
2	Casual player	Informative and automated	Awareness-raising regarding moderation tools	Automatic: reminder every 6 months
3	Low-risk player	Informative and personalized	Personalized, highlighting moderation tools	Automatic: reminder every 4 months
4	Moderate-risk play- er	Informative, personalized and inciting	Personalized, depending on the symptom identified	Pop-up asking the player to agree to continue playing Automatic: reminder every 2 months
5	At-risk player	Informative, inciting and restrictive	Telephone call with the player	Pop-up asking the player to agree to continue playing Interaction with the player via a phone call or live chat to determine their state of mind

In 2024, our responsible gaming strategy was christened "ROBIN" in reference to the small bird that carries several positive connotations:

- Protector against storms in Norse mythology;
- · Symbol of renewal and luck in many cultures;
- Natural regulator appreciated by gardeners;
- Emissary of benevolence in the Christian tradition.

## **ROBIN AT GAMING1**

ROBIN stands for "Risky Online Behavior Indicators" and embodies our approach to responsible gaming. It monitors players' activity, informs them and provides them with tailored recommendations so they can stay in control.

In certain cases, and always with the aim of protecting the player, ROBIN may ask a player for documents proving that they are playing within reasonable financial limits (financial accessibility check).

## **ROBIN'S KEY PRINCIPLES**

- ROBIN embodies the three pillars of our responsible gaming strategy: it monitors player activity through proactive detection, alerts players in the event of risk and offers them appropriate advice via moderation tools.
- Caring and empathetic, ROBIN watches over players without ever invading their personal space. It also plays an educational role by providing dedicated sections, activity reports and awareness programs.
- ROBIN is a trusted ally, offering relevant advice that is always in the player's interest, without commercial commitment or judgment. The tool, which is present

everywhere and easily accessible on the interface, is based on advanced moderation and proactive detection technologies.

 Much more than a tool, ROBIN applies to all our brands and embodies our vision of responsible gaming beyond GAMING1 technology. It adapts to all communication channels – website, chatbot, human interactions and more. Any entity linked to responsible gaming operates using ROBIN's "wings".

## ACADEMIC PARTNERSHIPS TO FURTHER RESEARCH ON DEPENDENCY

Aware of the importance of scientific research to better understand and prevent risk behavior, we have renewed our partnership with the Université libre de Bruxelles (ULB).

This collaboration aims, among other things, to deepen knowledge on the mechanisms of addiction, with potential applications to other problematic behaviors, such as excessive use of social media or video games.



FOR THE YEARS 2024

2025 AND 2026



## Responsible gaming with ROBIN

At Circus, responsible gaming has always been a priority. To embody this perspective of responsible gaming, Circus has developed **ROBIN**.

ROBIN is more than just a tool, it's a gaming companion, a source of advice and a guide to turn to when in doubt. It makes responsible gaming clear and accessible for everyone by suggesting personalized measures based on your activity, helping you maintain control over your gameplay. It can also answer your questions about responsible gaming or support if you need assistance.

# ROBIN is the abbreviation for Risky Online Behavior Indicator. Email (Second Control of the second control of t

#### Introduction

**Environmental** 

Social

Governance Appendices

We are also working with Clara Rethy, a psychology graduate and doctoral student at ULiège, whose mission is to assess, study and challenge the ROBIN model in order to perfect its evolution and support the scientific approach.

Furthermore, we began discussions with the University of Liège in 2024 with a view to starting a new partnership. This will involve a doctoral student in clinical psychology being hired as a responsible gaming analyst in 2025.

Their work will focus on the analysis of risky gambling behavior, the evaluation of our detection system and our strategies of communication with players. The objective is to ensure scientific validation of the systems in place, to identify concrete avenues for improvement and to develop sector practices based on evidence.

## COLLABORATION WITH YIELD SEC IN THE FIGHT AGAINST UNLICENSED WEBSITES

Using an artificial intelligence platform specializing in the analysis of online markets, we monitor and map the presence of illegal operators in real time. This technology allows us to identify non-compliant websites, assess their impact and transmit this information to the Gaming Commission in order to strengthen regulatory actions and the fight against illegal gambling.



#### DIGITAL CHALLENGES: THE DUAL THREAT OF THE BLACK MARKET AND ILLEGAL Gaming Platforms

🛔 Craig Davies 🕐 April 25, 2024 🖿 Features, Interviews, Latest News, Slider Images

The digital world has profoundly transformed consumption patterns across various economic sectors.

This phenomenon is evident to all through our relationship with digital technology and certain well-known platforms that are ubiquitous in our daily lives (GAFAM, Shein, Zalando, Uber, Booking e-banking, etc.).

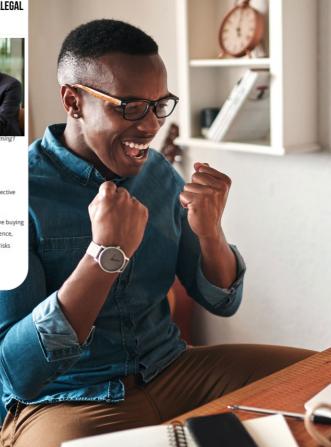
However, as highlighted by **Gaming1** CEO **Emmanuel Mewissen** below, this evolution has also led to new consumer behaviours that must be collectively addressed to avoid unfairly stigmatising the gaming industry.

With the gambling industry front of mind, Mewissen notes that a lack of healthy visibility and competitiveness is detrimental to channelling consumers into the legal environment, and the protective measures that are subsequently in place.

In conversation with SBC News, a far reaching conversation looks at how grave an issue compulsive buying is, adopts a home market focus to assess black market threats and how to wipe out its rising influence, details what more regulators could be doing and touches on if players are mindful of the serious risks posed by visiting such entities.



mmanuel Mewissen, Gaming





Meanwhile, we are committed to raising awareness of this issue among the public and political decision-makers by regularly publishing articles in the media. By highlighting the risks associated with unregulated platforms – lack of player protection, non-compliance with age limits, increased exposure to fraud – we contribute to an informed debate and a better understanding of the challenges of regulating the sector.

## BAGO CONFERENCE "STAY SHARP, PLAY SAFE: PROTECTING PLAYERS IN THE DIGITAL ERA"

During Safer Gambling Week, we took part in the annual BAGO conference entitled "Stay Sharp, Play Safe: Protecting Players in the Digital Era". Jean-Christophe Choffray (Deputy CEO) and Emmanuel Mewissen (CEO) reiterated the importance of responsible use of technology to strengthen player protection, in collaboration with other European players in the sector.

## GAMING1 HAS BEEN ISO 27001 CERTIFIED SINCE 2018

In 2024, we renewed our ISO 27001:2022 certification, the benchmark standard for information security. This renewed certification, along with regular audits, confirms our commitment to protecting users' personal data and strengthening our systems against intrusion attempts, data leaks and cyberattacks.

66

USING AN ARTIFICIAL INTELLIGENCE PLATFORM SPECIALIZING IN THE ANALYSIS OF ONLINE MARKETS, WE MONITOR AND MAP THE PRESENCE OF ILLEGAL OPERATORS IN REAL TIME.



Environmental

Social

Governance

# Action plan for the future

Player protection remains a constant priority for us. Through several tangible initiatives, we are continuing our commitment to a safe, regulated and sustainable gaming environment.

## CONTINUOUS TEAM TRAINING

Since 2021, each new employee has undergone training in responsible gaming, which is renewed annually. In 2024, this program was completely overhauled and structured into three levels, based on the level of interaction between staff members and players. The participation rate is currently at 67.04%, a first milestone towards our annual objective of 80%.

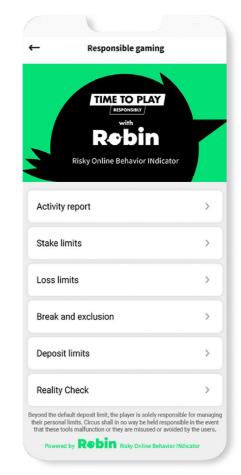
## PROTECTING OUR PLAYERS FROM THE RISKS ASSOCIATED WITH GAMBLING IS A FUNDAMENTAL RESPONSIBILITY.

## STRENGTHENING MODERATION TOOLS

Our tools are updated each year to offer players more control over their practice. In 2024, we introduced a gaming time notification as well as a personalized activity report. Two major new features are planned for 2025: limits by stake and exclusion by game type.

## CONTINUOUSLY DEVELOPING OUR RESPONSIBLE GAMING STRATEGY

Protecting our players from the risks associated with gambling is a fundamental responsibility. This is why we are constantly deploying new tools, strengthening our policies and increasing awareness-raising actions. The launch of ROBIN in 2024 allowed us to define our responsible gaming strategy and offer increasingly personalized and responsive support as soon as the slightest sign of risk behavior is detected.



## **Our performance**

## CUSTOMER SERVICE THAT LISTENS TO PLAYERS

Our commitment to players translates into accessible and responsive support. Our customer service is available 7 days a week, from 8am to 3am, via email and chat, with an average response time of 12 minutes. After each interaction, a satisfaction survey is sent to assess the quality of our services. In 2024, our efforts were rewarded with high satisfaction scores:

• Email support: 77.7%

Chat support: 83.91%

	2022	2023	2024
Email support satisfac- tion rate*	76.33%	79.10%	77.7%
Chat support satisfac- tion rate*	79.81%	80.10%	83.91%

\* Average data collected for the Circus.be operation

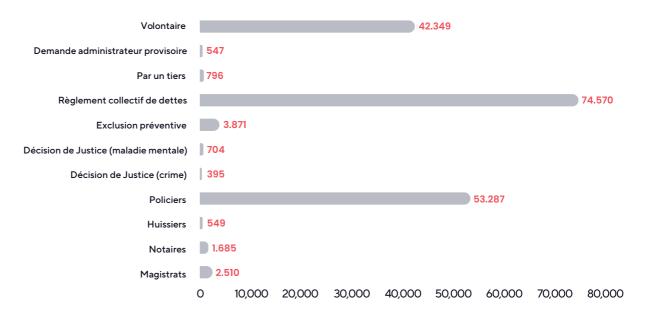




## **A GAMBLING BAN SYSTEM**

We use gambling ban systems to prevent access for vulnerable players. In Belgium, the EPIS system of the FPS Justice department centralizes exclusions (whether voluntary, professional, judicial or imposed by the Gaming Commission). This check is carried out upon registration and at each subsequent login.

GAMING1 automatically detects any login attempt by a player registered on this list and blocks access to its platforms. Equivalent arrangements are in place in the Netherlands, Switzerland, Spain and Portugal, ensuring consistent protection in accordance with local regulations.



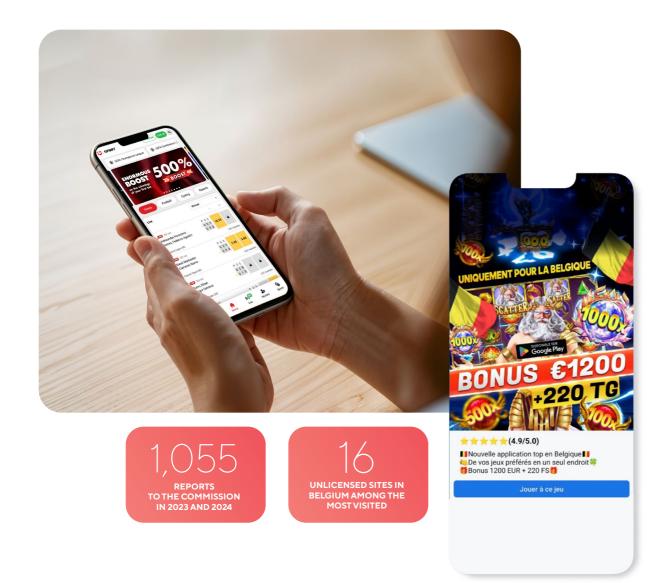
#### Introduction

Environmental

Social

Governance

Appendices



## OUR FIGHT AGAINST ILLEGAL WEBSITES

Our study, carried out in collaboration with Yield Sec in June 2024, revealed that 16 of the 25 most visited gambling websites in Belgium operate without a license, capturing more than 60% of traffic. This observation underlines the urgency of strengthening the fight against these platforms that avoid all regulation and guarantee no protection for players.

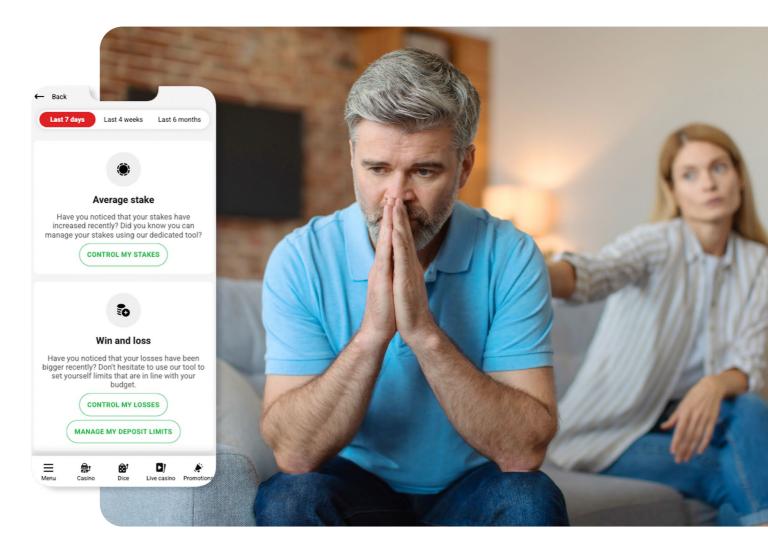
As a legal operator concerned about the integrity of the gambling sector and consumer protection, we report adverts from illegal platforms to the Gaming Commission. This is done in the sincere hope that concrete action will be taken as soon as possible to counter the growing influence of illegal operators. In 2023 and 2024, we submitted a total of 1,055 reports to the Commission.

OUR APPROACH IS BASED ON ACTIVE PREVENTION, BECAUSE WE HAVE NO INTEREST IN OUR PLAYERS ENCOUNTERING DIFFICULTIES LINKED TO AN UNCONTROLLED RELATIONSHIP WITH GAMING.

## OUR INTERVENTION WITH AT-RISK PLAYERS

Depending on the player's risk level, our teams adapt the support to offer partially personalized monitoring. The goal is to keep players within socially responsible gaming practices, corresponding to categories 0 to 3, while respecting their preferences, lifestyle and individual capacity.

Our approach is based on active prevention, as we have no interest in our players experiencing difficulties linked to an uncontrolled dependency, which leads to consequences for both them and their loved ones.



Environmental

Governance

Social

Appendices

# OUR STAFF MEMBERS

As a gambling operator, both in our landbased establishments and online, we rely on talented people and innovative ideas to ensure our success. Our teams cover a wide range of professions, from people working in our casinos and gaming halls to sales representatives, administrative employees and developers. They are the driving force behind our business and contribute to making it dynamic every day.

Their well-being is at the heart of our priorities.

This is why we are committed to providing them with a stimulating and fulfilling work environment, where everyone can develop their skills, achieve their ambitions and be recognized throughout their career at GAMING1.



Governance

Social

Appendices

# Evaluation of impacts, risks and opportunities related to player protection



## 1. EFFECTS ON THE QUALITY OF LIFE OF OUR STAFF MEMBERS

## RISKS

- Operational malfunctions impacting efficiency and business continuity
- High turnover leading to loss of skills and increased recruitment costs
- Deteriorated social climate that could lead to internal tensions or strikes
- Legal risks linked to possible disputes or litigation



#### **OPPORTUNITIES**

- Strengthen staff members' satisfaction and commitment
- Attract and retain the best talent
- Improve our reputation and employer image, a key asset in a competitive market
- Optimize productivity and overall performance through motivated and well-supported teams

## 2. PROVIDING AN INCLUSIVE AND EQUITABLE CULTURE



#### **OPPORTUNITIES**

- Deploy a structured DEI policy to promote equal opportunity and diversity within teams
- Strengthen the company's reputation as a responsible and committed employer
- Support the brand's international development by meeting societal expectations and global standards
- Drive performance and innovation by encouraging diverse perspectives and enriched collaboration

## **3. RESPECT FOR FUNDAMENTAL RIGHTS**



#### RISKS

- Exposure to legal action for non-compliance with regulations
- Damage to reputation and loss of stakeholder trust

#### **OPPORTUNITIES**



• Strengthen monitoring and checks for our suppliers to ensure human rights and ethical standards are respected

Environmental

Social

Governance

## **Our commitment**

Our five values – Team Spirit, Boldness, Performance, Pleasure and Integrity – inform our corporate culture.

Integrity is central to our commitment to providing a healthy, fulfilling work environment that is respectful of everyone's well-being.

These principles are laid out in our Code of Conduct, a shared framework for the entire organization.

## PROMOTION OF AN INCLUSIVE, RESPECTFUL AND EQUITABLE ENVIRONMENT

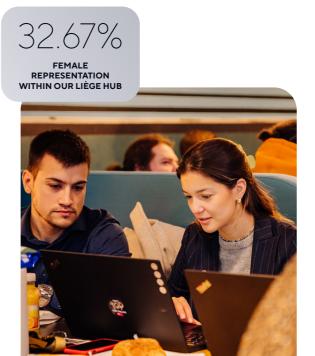
At GAMING1, inclusion, equal opportunities and respect for everyone are fundamental pillars of our culture. We reject all forms of discrimination, whether direct or indirect, and ensure fairness in our business relationships and at every stage of our staff members' professional careers.

Our decisions regarding recruitment, development and collaboration are based solely on skills, qualifications and attitude. We value diversity of profiles, backgrounds and nationalities. Women make up 32.67% of the company workforce, a figure significantly higher than the IT sector average, estimated at 20%.

We also collaborate with Passwerk, a company specializing in employing people on the autism spectrum. Two consultants have joined our quality control team as testers, providing valuable expertise and enriching our team.

We respect religious pluralism, individual freedoms and each person's identity. We are committed to maintaining a workplace free from harassment and bullying. Employees can freely report any problematic situation to their line manager or to the HR department so that appropriate measures can be taken.

Our work environment is open, fair and conducive to the development of each individual, allowing all our talents to fully express themselves and contribute to our collective success.



## A RESPONSIBLE, ETHICAL AND SECURE WORK ENVIRONMENT

At GAMING1, we are committed to ensuring working conditions that comply with the fundamental rights, health and dignity of each individual. We follow the principles laid out in the Universal Declaration of Human Rights, the ILO conventions and the guidelines of the United Nations and the OECD. Child labor, forced labor and all forms of exploitation are strictly prohibited, both within the company and for our suppliers.

We also respect freedom of expression, association and collective bargaining. All our employees benefit from collective agreements tailored to their country, ensuring a structured framework for dialog and enhanced labor rights.

Lastly, we ensure a safe and healthy work environment, in compliance with European standards. We ensure fairness in wages, working hours and working conditions, in strict compliance with national statutory requirements.



Governance

Social

## **Our** actions

## **SOCIAL DIALOG**

At GAMING1, we place active listening at the heart of our management culture. Several systems are in place to encourage ongoing formal and informal dialog with our employees.

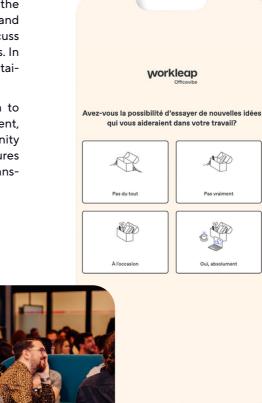
Our main tool in this respect is the Officevibe platform, which sends anonymous weekly surveys to all teams. This system allows us to monitor the level of engagement in real time, collect regular feedback and respond to it individually.

In addition, we have launched ComExpresso, a voluntary meeting between a staff member and the manager of their choice, organized every other Friday morning. This confidential space allows you to submit suggestions, questions or ideas for improvements.

We also maintain a structured dialog with staff repre-

sentatives via two official bodies at head office: the Works Council and the Committee for Prevention and Protection at Work, which meet monthly to discuss economic and social issues and working conditions. In our other locations, this dialog is held directly and tailored to the size of the teams concerned.

Lastly, a company breakfast is held each month to bring our employees together for a friendly moment, whether in person or remotely. This is an opportunity for management to share key news, business figures and current projects in a spirit of openness and transparency.





## A STRUCTURED AND ENGAGING ONBOARDING PROCESS

AtGAMING1, onboarding is designed to ensure a staff members' successful integration. Its aim is threefold: facilitating the adoption of our corporate culture, helping new staff members to become quickly operational and supporting their skills development.

From their first day, new arrivals are welcomed by their line manager, receive support from the HR team and are guided through key introductions: presentation of our philosophy, IT training, visit of the premises, meeting with their team and a dedicated sponsor.





Welcome Days are held several times a year. During these events, the founders and members of the Executive Committee present our vision, our values and how the company operates, before a visit to a casino to get to know our products in the field.

Monitoring then continues with two structuring interviews:

- A discovery interview, held after one month, allows us to gather initial impressions and adjust course if necessary;
- An integration interview, between the 4th and 5th months, brings the onboarding process to a close by highlighting successes and defining the next steps towards autonomy.

Environmental

Governance

Social

Appendices

## SKILLS DEVELOPMENT: INVESTING IN EVERYONE'S POTENTIAL

At GAMING1, we support our talents in their personal and professional development. Upon arrival, each staff member benefits from a tailor-made training program, defined alongside their line manager to facilitate their onboarding and inter-team collaboration.

Each year, a training plan lists the sessions offered internally, some of which are available to everyone while others are tailored to specific roles. At the same time, an individual budget of €500 is allocated to each staff member to meet personalized training needs.

An annual review with the line manager provides an opportunity to take stock of the objectives achieved, adjust ambitions, strengthen alignment with the company's values and identify new development opportunities.



AT GAMING1, WE SUPPORT OUR TALENTS IN THEIR PERSONAL AND PROFESSIONAL DEVELOPMENT.





## A WORKING ENVIRONMENT DESIGNED FOR WELL-BEING AND PERFORMANCE

At GAMING1, we design our workspaces as levers of creativity, collaboration and comfort. Our hubs offer great flexibility, offering different environments tailored to everyone's needs: project areas, collaborative spaces, private offices and rooms for meetings, videoconferences or brainstorming sessions.

Well-being is also an integral part of the experience, with a zen room, coffee bars, a games area, terrace, showers, as well as access to services such as sports classes, a concierge, parcel delivery and free snacks. Accessibility is at the heart of our approach: all our hubs are tailored for people with disabilities.

Lastly, we pay particular attention to workstation ergonomics. Risk analyses have been carried out related to screens, while practical training has been provided to improve comfort and posture on a daily basis.

## SAFETY AND WELL-BEING OF OUR STAFF MEMBERS

Our Safety and Well-Being Committee organizes regular training courses in first aid, fire and electrical safety. Trained employees can be identified thanks to a badge (green for first aiders, red for emergency managers), while a refresher program helps keep their skills up to date.

Two trusted persons are available at all times to offer confidential support in the event of personal or professional difficulties. Furthermore, external coaches can support employees on topics such as stress management, self-confidence or communication, either at the employee's request or upon their line manager's recommendation.

The majority of our staff members benefit from health coverage including insurance in the event of sickness and a workplace accident, as well as family leave. To promote work-life balance, we offer up to 50% remote working and flexible hours tailored to individual needs.



Governance

Social

## **QUALITY OF LIFE AT GAMING1**

We are deeply convinced that the development and satisfaction of our employees play an essential role in collective success. In order to foster a pleasant working environment and strengthen team cohesion, we have implemented a series of initiatives that enrich the professional experience within GAMING1. Here are some of these actions:

- **Health breaks:** We provide fresh fruit daily and offer free soup every Thursday in winter for a comforting break.
- Healthy and responsible drinks: We offer a selection of free drinks, chosen for their low sugar content and environmental impact.
- Encouragement to practice sports: We reimburse registration fees for sports challenges to motivate our employees to stay active.
- Social events: We regularly organize after-work events to allow our teams to relax and strengthen social bonds.
- Celebration and recognition: We mark every important celebration with thoughtful gestures and organize team-building activities to promote collaboration.
- **Sports initiatives:** We organize sporting events to promote physical health and create social time.
- Summer activities: We offer fun activities in English during the summer to combine relaxation and learning.

These initiatives demonstrate our desire to foster a balanced and stimulating work environment, where each staff member can flourish both personally and professionally.

## **ALL SHAREHOLDERS**

In 2024, GAMING1 launched an ambitious project called "All shareholders", offering its staff members and freelancers based in Belgium the opportunity to become shareholders of the Group. This program allows eligible employees to invest in the company by purchasing shares worth  $\leq$ 500,  $\leq$ 1,000 or  $\leq$ 1,500, with the potential to benefit over a period of eight years.

The objective is to offer our employees the opportunity to benefit from the profits linked to the development of the company, by generating interest based on the evolution of the share price. This program also helps to strengthen employee involvement in the Group's success, by giving them direct participation in the company's capital. This is a unique opportunity to be part of GAMING1's history and actively contribute to its growth. From 2025, this initiative will gradually be opened to all of our international employees, in order to allow all of the Group's talents to benefit from this collective dynamic.









## "ALL SHAREHOLDERS", WHAT DOES THAT INVOLVE?



The opportunity for our staff members to invest in the group and become shareholders – evolving from being team members to true business partners



A unique opportunity to be part of the group's history



Playing an even greater role in the success of GAMING1 by sharing a common goal



Sharing financial successes

Governance

Appendices

## Action plans for the future

DAYS (MINIMUM) OF TRAINING PER EMPLOYEE

## **BOOST ACCESS TO CONTINUED TRAINING**

Social

We aim for a minimum of three days' training per employee in Belgium, 40 hours in Portugal and 20 hours in Spain. In 2024, a fair amount of content was updated and an annual training plan was put in place. New themes will enrich the offering, particularly on the topics of well-being and diversity, equity and inclusion (DEI).





## DEVELOP CAREER PATHS FOR CERTAIN KEY ROLES

We build personalized career paths alongside managers and human resources. The aim is to offer more visibility and support to our talents in their development within the company.

## **PROMOTE SALARY TRANSPARENCY**

In line with the European directive, we are committed to making our salary practices more transparent. Although the salary scales and ranges have not yet been released, we are striving to make this information accessible to everyone, in a spirit of fairness.

## **Our performance**

## **GAMING1 IS A TOP EMPLOYER**

This year we achieved exceptional results with an overall score of 79.51%, thereby consolidating our place among the best employers thanks to our commitment to an inclusive, innovative and ethical work environment.

- 92.26% for talent acquisition: We attract the best profiles by implementing innovative and fair recruitment processes, which allow us to diversify and enrich our teams.
- 87.69% for the integration of new employees: We ensure a smooth and inclusive onboarding, so that every employee feels welcomed and comfortable from day one.
- 85.41% for remuneration and recognition: We value our staff members through initiatives such as our profit sharing system, therefore encouraging collective success.

We remain committed to continuous improvement, always aiming higher to provide a work environment where every employee can thrive and contribute fully to our success.

	2022	2023	2024
Overall Top Employer Score	76%	76.86%	79.51%

## SATISFACTION SURVEY

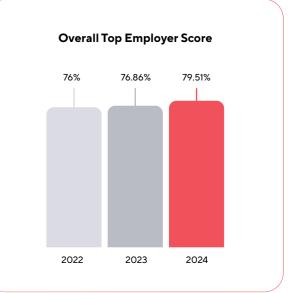
Following our weekly surveys, we calculated our eNPS (*Employee Net Promoter Score*), which stands at 17 on a scale of -100 to +100. This score places us in the "Very Good" category, with over 30% of promoters within GAMING1. The areas where our employees feel most fulfilled are:

- The relationship with their manager (8.2/10);
- Relationships with their peers (7.7/10);
- Their overall happiness at work (7.3/10).

Overall employee satisfaction stands at 7.2/10 for 2024. This data is regularly monitored and analyzed in order to implement concrete initiatives to improve the well-being of our employees and increase these scores.

Although comparison between years is complicated due to the evolution of the eNPS system at GAMING1, we remain committed to continuous improvement.

	2022	2023	2024
eNPS	4.2/5	Unmea- sured	17 on a scale of -100 to +100
Survey parti- cipation rate	53%	Unmea- sured	57%







> h

**ITJOBS** 

## **KEY FIGURES CONCERNING OUR WORKFORCE**

These few key figures reflect a stabilization of our recruitment dynamics, which can be attributed to our strategic choice to close our operations outside Europe to focus on our main markets: Belgium, the Netherlands, France, Switzerland, Spain and Portugal. This geographical reorientation has allowed us to strengthen our teams in these countries, while highlighting the diversity that characterizes our company, with employees from many nationalities across the world. This phenomenon illustrates our ongoing commitment to a multicultural and inclusive team.

Regarding gender equality, we are proud to note that the proportion of women among our workforce remains above the sector average. Furthermore, our unadjusted gender pay gap, which measures the overall pay gap between women and men, is 8.71%, which is below the European average of 13%, demonstrating our concrete commitment to reducing pay inequalities. It is important to clarify that this indicator does not take into account the gaps for similar roles, but rather covers all salaries within GAMING1.

Beyond cultural diversity and equality, GAMING1 also stands out thanks to its powerful technological expertise. From our hub in Liège, which has become a genuinely booming digital hub, we are promoting our expertise across Europe. With over 500 tech talents and over 50 different IT professions represented internally, we have built a robust and innovative platform that goes far beyond gaming.

Our technological solutions are now applied to e-commerce, data, user experience and learning. This versatility illustrates a clear ambition to make GAMING1 a European benchmark in responsible digital entertainment and to actively contribute to the socio-economic dynamism of our region.



	2022	2023	2024
Number of employees	1,550	1,390	1,361
Number of self-employed workers	Unmeasured	86	81
Number of workers provided by a third-party company	Unmeasured	4*	31
Number of FTEs	Unmeasured	1,347.8	1,304.1
Number of departures	Unmeasured	488	411.26 (FTE)
Turnover rate	10.80%*	35.39%	31.53%
Number of nationalities	16*	17*	41
Percentage of women	30.08%*	36.33%	32.67%
Percentage of women in management	14.28%	7.14%	7.14%
Age distribution	Unmeasured	< 30: 28%	< 30: 29.09%
Percentage of permanent contracts	Unmeasured	92.23%	91.77%
Unadjusted gender pay gap	Unmeasured	1.62% (head office)	8.71%
Percentage of employees with disabilities	0.49%*	1.15%	0.95%
Number of promotions, broken down by gender	Total: 80	• Women: 6 • Men: 13	• Women: 34 • Men: 48
Average number of training hours per employee	35.8 hours*	32.2 hours*	23.4 hours
Percentage of employees receiving regular performance and career development reviews	100%	100%	100%
Percentage of employees covered by collective agreements	100%	100%	100%
Percentage of employees covered by worker representatives	Unmeasured	Unmeasured	68.84%
Percentage of employees covered by social protection	Unmeasured	100%	100%

\* Value calculated only for our head office

Environmental

al Social

Governance

## **BUSINESS** CONDUCT

GAMING1 takes a proactive approach to ensuring consistent and ethical business conduct across all its markets, in line with one of our key values: integrity. In this way, we ensure that we strengthen the trust of our stakeholders, whether they are our employees, investors, business partners, players or regulatory authorities.

By fostering open and transparent communication, we are committed to maintaining and enhancing these essential relationships, while ensuring a responsible gaming environment that meets industry standards.



Social

Governance

## **Evaluation of impacts, risks and opportunities** related to our workforce

## **1. ETHICAL PRACTICES FOR ALL OUR STAKEHOLDERS**



## RISKS

 Lack of detection of certain incidents that could compromise the integrity of the company

## **OPPORTUNITIES**

- Strengthen transparency in business conduct
- Promote and better communicate our ethics policies and training
- Build a solid brand image, a guarantee of trust and credibility

## 2. PROTECTION OF STAKEHOLDERS IN THE EVENT OF WHISTLEBLOWING



#### RISKS

- Regulatory non-compliance that may lead to consequences
- Damage to the company's reputation
- Risk of financial sanctions



#### **OPPORTUNITIES**

- Strengthen corporate culture by encouraging a climate of trust and integrity
- Detect problems more quickly and limit their impact
- · Consolidate compliance with applicable regulations and anticipate statutory developments



## **3. NEGATIVE SOCIETAL IMPACT OF CORRUPTION AND BRIBERY**



- Legal proceedings with financial and legal consequences
- Degradation of reputation and loss of credibility
- Erosion of confidence of investors and other stakeholders

### **OPPORTUNITIES**

- · Strengthen systems for preventing and detecting fraudulent practices
- Demonstrate our commitment to responsible governance
- · Strengthen our relationships with stakeholders by ensuring honest business practices

Social

Governance

## **Our governance**

## OUR ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

The Board of Directors is responsible for defining the company's general policy and strategy, while overseeing operational management to ensure effective and transparent governance. The Board works in close collaboration with the Executive Committee, which implements this strategy on a daily basis and manages all of the company's activities.

In 2024, these two bodies met six times to review the company's performance, validate strategic directions and ensure their proper execution.

The Audit Committee, for its part, plays a key role in internal monitoring and risk management. It ensures the financial integrity of the company, compliance with regulatory obligations and the effectiveness of monitoring systems.

Finally, the ESG Committee, established in 2024, meets once a year to define our sustainability roadmap, analyzing the strategic short and long-term risks and opportunities, in order to ensure that we best society's expectations. The discussions notably include assessing our ESG ratings, prioritizing sustainability challenges and monitoring policies.





## GAMING1's commitment to ethics and integrity

GAMING1 is firmly committed to the highest standards of integrity, ethics, transparency and accountability in accordance with its corporate culture. These fundamental principles are at the heart of our values and are detailed in our Code of Conduct, which clearly defines the expected behaviors within the organization. We promote strict ethical standards and expect third parties working with or on behalf of GAMING1 to adhere to these same requirements.

Ensuring an ethical and regulatory-compliant working environment is a priority for GAMING1. We are committed to creating a culture where every staff member, shareholder, partner or affiliate can express their concerns without fear of reprisal.

Any information relating to potential violations, whether it is a failure to comply with laws, regulations

or our internal policies, must be able to be reported in confidence. We consider these reports to be an essential step in preserving the integrity of our company and strengthening the trust of our stakeholders.

This is why we make every effort to guarantee a secure, confidential and impartial framework where any inappropriate behavior can be reported. This desire is reflected in particular by our Whistleblowing Policy and Procedure, which defines the measures put in place to protect whistleblowers and ensure rigorous processing of reports.

The fight against corruption and bribery is also an integral part of our ethical approach. Accepting or offering gifts for the purpose of influencing a decision is strictly prohibited, in accordance with our Employment Regulation.

Any violation results in disciplinary action against those involved. Collective vigilance plays a key role in preventing and detecting these practices, and we actively encourage our staff members to report any suspicious behavior.

Each alert is subject to a thorough investigation carried out with the utmost rigor. At GAMING1, we are committed to ensuring an honest and transparent professional environment, where everyone can develop with confidence. Full details of this policy are available in our *Anti-Bribery & Corruption Policy and Procedure*.

ENSURING AN ETHICAL AND REGULATORY-COMPLIANT WORKING ENVIRONMENT IS A PRIORITY FOR GAMING1. Social



## **Our** actions

## **ETHICAL TRAINING**

To anchor our values and ensure solid control over our internal policies, GAMING1 offers mandatory training on ethical issues each year, namely covering our Code of Conduct, the whistleblowing procedure, the fight against corruption and money laundering.

These modules are mandatory for all new staff members and must be renewed each year in e-learning format, with a validation test. A minimum score of 80% is required, and reminders are sent to ensure optimal participation. This system ensures a high level of awareness and alignment with our ethical standards.

## **DUE DILIGENCE**

GAMING1 has had a dedicated Supplier Code of Conduct since 2024, ensuring clear alignment with our ethical values. This document is now systematically sent to all new partners and is gradually shared with existing suppliers to obtain their formal adherence.

Meanwhile, we are continuing our due diligence process through a specific questionnaire. This allows us to assess our partners' compliance in terms of the fight against corruption and money laundering, reporting of abuse, transparency and governance.

93.80% PARTICIPATION RATE IN THE CODE OF CONDUCT, ABC & WHISTLEBLOWING TRAINING



## Action plans for the future

## INCREASE THE PARTICIPATION RATE FOR ETHICS TRAINING

The aim is to achieve at least 80% participation in our compliance training courses, in order to raise awareness among as many staff members as possible and provide them with a clear understanding of our ethical principles.

In 2024, several training courses were updated and made more engaging in order to better reflect regulatory changes.







## GET OUR SUPPLIERS TO ADHERE TO OUR CODE OF CONDUCT

The aim is for 50% of purchasing capital, including freelancers, to adhere to our Supplier Code of Conduct by 2027.

In 2024, the Code of Conduct was drafted and sent to freelancers. Response remains limited, but in 2025 we plan to send a reminder to these partners and target our most strategic suppliers. Introduction

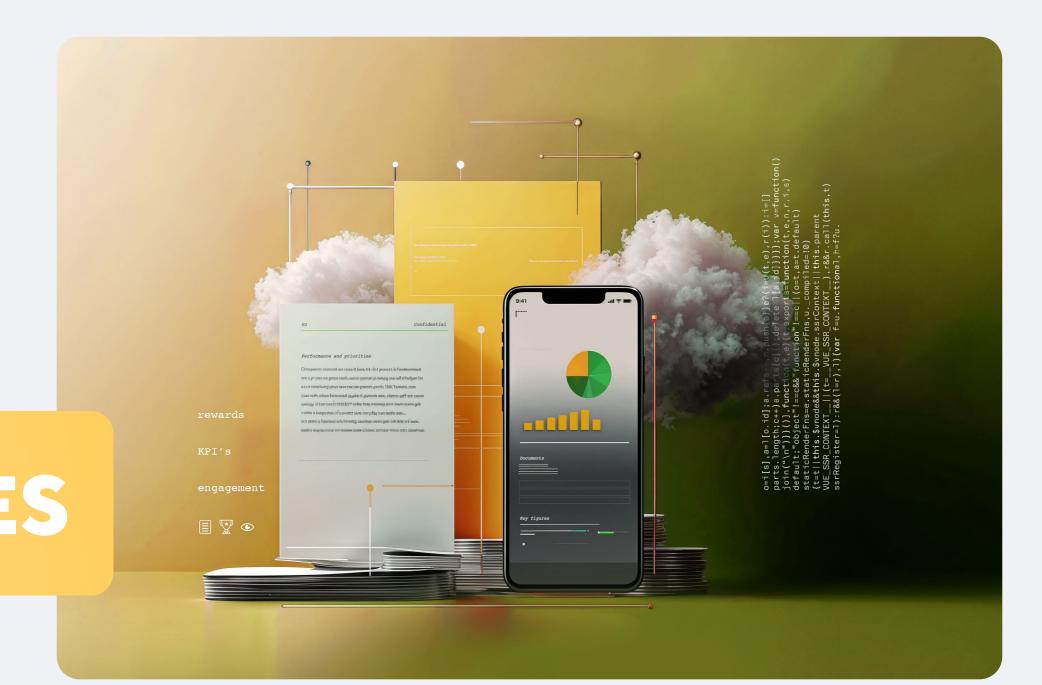
Environmental

Social

Governance



# APPENDICE



ntal

Social

Governance



## **ECOVADIS**

The EcoVadis score allows companies to assess their corporate social responsibility (CSR) performance across three key pillars: environmental, social, and ethical impact. This internationally recognized assessment system is based on rigorous standards such as the Global Initiative for CSR Reporting, the United Nations Global Compact, ISO 26000, the conventions of the International Labour Organization (ILO), the CERES principles and the United Nations Guiding Principles on Business and Human Rights.

In January 2025, we were honored to receive the silver medal for the third consecutive year, demonstrating our continued commitment to sustainable development. This distinction places us among the top 9% of companies rated by EcoVadis worldwide in terms of sustainability.

The assessment is based on an in-depth analysis of company practices, drawing not only on data provided by the companies themselves, but also on external sources, such as international regulations and standards. This recognition confirms our commitment to continually improve and adopt best practices to strengthen our positive impact. The EcoVadis score is based on a rigorous assessment through an online questionnaire covering 21 sustainability criteria, divided into four main areas: environment, social, ethics and sustainable sourcing. These criteria are revised annually to adapt to current challenges in social responsibility and to ensure an ever more relevant assessment.

With an overall score of 71%, we achieved a valuable award, reflecting our continued progress. This year, we have particularly strengthened our performance in the areas of environment, labor rights, human rights and ethics. On the other hand, our sustainable procurement score saw a slight decline, highlighting an area for improvement to be prioritized.

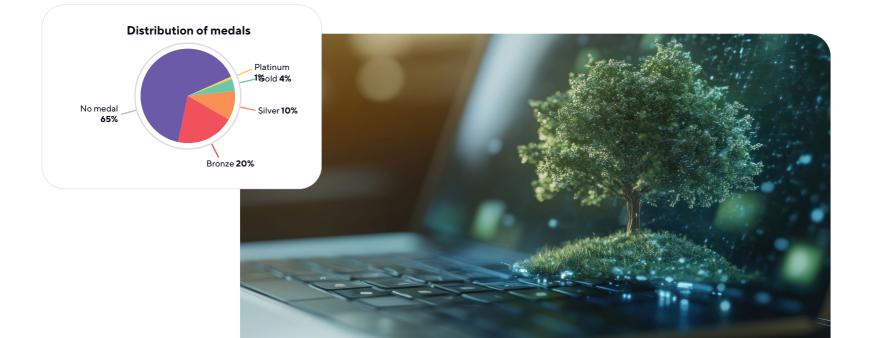
The EcoVadis label plays a key role in our sustainability approach, as it allows us to objectively assess our situation and identify levers for improvement. We are building on these findings to refine our strategies and strengthen our commitments, with particular attention paid to the development of sustainable procurement practices.





Insufficient Partial Moderate Advanced Exceptional — Average score

	2022	2023	2024
EcoVadis score	58%	69%	71%



**Environmental** 

ental

Social

Governance



# United Nations Global Compact

The United Nations Global Compact is an international initiative launched in 2000 to encourage companies to adopt responsible and sustainable business practices.

It is based on ten universally recognized principles, covering human rights, labor standards, the environment and the fight against corruption. By adhering to it, companies commit to integrating these principles into their strategies and operations, while actively contributing to the United Nations Sustainable Development Goals (SDGs).

At the end of 2023, GAMING1 joined this initiative, thus affirming our commitment to ethical and sustainable practices. We are committed to continuous progress in these areas and to strengthening our actions in favor of respect for fundamental rights, environmental protection and transparency.

In 2024, we submitted our first Progress Communication Report, an approach we plan to repeat annually to measure and share our progress. Furthermore, our commitment to the Global Compact is part of a broader vision of positive impact, in line with the United Nations Sustainable Development Goals. We are committed to aligning our initiatives with these objectives to make a significant contribution to a more sustainable and responsible future.

WE SUPPORT



# key performance indicators

	2022	2023	2024
PLAYERS			
RESPONSIBLE GAMING			
Number of personalized messages sent to players	1,913	5,080	4,894
Number of automatic messages sent to players	122,000	202,002	349,383
Donations to addiction research to date	-	€230,000	€358,571
Reports of illegal websites to the Belgian Commission	Unmeasured	1,035	20*
PLAYER SATISFACTION			
Player NPS	5.2	7.8	22.6
Email ticket satisfaction rate	75.81%	78.62%	77.7%
Chat support satisfaction rate	79.81%	80.10%	83.91%

\* The decrease in reports in 2024 is due to outsourced work with Yield Sec, presented to the Gaming Commission; spontaneous reports having resumed in 2025, their number will increase in the next report.





IN PURSUIT OF NEXT LEVEL ENTERTAINMENT

WWW.GAMING1.COM