

Sustainability Policy

STILLFRONT
GROUP

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1. Introduction

In order to build a company that generates long-term value, sustainability must be an integral part in our strategy and in all our business processes. Stillfront Group AB (publ) (“**Stillfront**” and together with its subsidiaries “**Stillfront Group**”) is committed to sustainable business practices, the continuous safeguarding and supporting of our personnel as well as contributing to a positive impact on the societies in which we operate.

We abide to sustainability in all corporate activities through implementation of this policy and other governing documents including our Code of Conduct, Anti-bribery and Anti-Corruption Policy, Whistleblowing Procedure and HR Policy.

Stillfront has established an annual sustainability cycle build on a set of workstreams between Stillfront, its studios and other stakeholders.

The aim with this policy is to define the framework for how Stillfront works with sustainability and to provide a governing platform for all its business processes. The sustainability framework is well connected to our core values and business model and derives from a solid materiality analysis that is based on a yearly assessment that involves both internal and external stakeholders. The sustainability framework is presented annually to the board of directors.

This policy has been adopted by Stillfront’s Board of Directors and is reviewed on an annual basis.

2. Responsibility and Focus Areas

Stillfront’s Board of Directors is overall responsible for the sustainability framework of the Stillfront Group. The Board decides on overall objectives and key performance indicators which are disclosed annually in Stillfront’s Sustainability Report.

Stillfront’s Executive Management is responsible for the execution and implementation of the sustainability framework, including this policy. Within the Executive Management, the Head of IR, Communication and Sustainability is responsible for coordinating and driving the overall sustainability work.

Stillfront’s sustainability framework is divided on the following focus areas:

- Business Ethics and Governance
- Employer Responsibility
- Environmental Responsibilities

3. Business Ethics and Governance

Stillfront Group’s requirements on social responsibility and compliance with ethical principles are based on international generally accepted regulations and norms, including UN Global Compact (<http://www.unglobalcompact.org>). We are committed to complying with laws, rules and ethical principles that apply to our organisation.

3.1 Protection of human rights

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Stillfront Group recognizes its responsibility to promote and respect internationally proclaimed human rights.

3.2 Responsible games

Stillfront Group and its professionals are committed to delivering digital entertainment and is conducting business in interactive entertainment. Stillfront Group's games are targeted at adults. Our basic principle is that playing games should be fun, positive, fair and safe for all. Stillfront Group has a social responsibility for the growing gaming population that play our games and the social platforms we create for them.

Stillfront Group complies with the ratings and recommendations in each relevant market as to regards content and age. The marketing of our games should be ethical, honest and reflect generally accepted social standards.

Stillfront Group's FAIR model covers **F**orum & **C**ommunities, **A**ge Protection, **I**nclusion & **D**iversity and **R**esponsible games, **M**arketing and **M**onetization and is included in Stillfront Group's Guidelines for Responsible Games that apply to all studios of the Stillfront Group.

3.3 Data Privacy and Data Protection

Stillfront Group is a data-driven organization, which provides us with knowledge about our gaming activity. We analyse patterns and behaviour related to gaming on a daily basis. We emphasize respect for our users and handle personal information responsibly, with care and in compliance with applicable laws and regulations in the markets where we operate.

3.4 Anti-money Laundering and Anti-terrorist Financing

Stillfront Group is committed to full compliance with applicable anti-money laundering and anti-terrorist financing laws and regulations, and takes appropriate actions to assess the integrity of our business counterparts to ensure that no illegitimate funds are concealed.

3.5 Anti-bribery and anti-corruption

Stillfront Group complies with applicable anti-bribery and anti-corruption laws and regulations in the countries where we have presence. Hence, Stillfront Group does not tolerate bribery (the offering, giving, authorising, receiving, requesting or soliciting of something of value for the purpose of influencing the actions of the recipient) or corruption (the abuse of entrusted power for personal gain, and can take the forms of bribery, embezzlement, fraud and extortion) in its business practices. Further, it is prohibited to contribute financial or non-financial means to any third party in a way that could constitute corruption.

Stillfront has adopted an Anti-bribery and Anti-corruption Policy which applies to all individuals working for, or on behalf of, Stillfront Group, in any capacity and any other individual associated with Stillfront Group, wherever located.

4. Employer Responsibility

Stillfront Group's business depends on the wellbeing of our professionals. We operate in

an industry that revolves around expertise and talent. Behaving responsibly and sustainably will see us attract and retain the foremost talent in the industry. This demands an inclusive, equal workplace with high diversity.

Stillfront has adopted a Code of Conduct that describes our shared values, business principles and policies. The Code of Conduct covers a number of areas in the field of sustainability, including provisions on human rights, business ethics, data privacy and data protection and anti-corruption, as well as other key processes. All professionals are expected to comply with the Code of Conduct and are trained in the code through a web-based training course.

4.1 Health and Safety and Protection of Labour Rights

Stillfront Group is committed to providing a safe and healthy work environment for all professionals to achieve wellbeing, personal integrity, and proper work performance. Stillfront Group complies with applicable labour laws, regulations and occupational health and safety laws and standards.

Stillfront Group recognizes and respects its employees' right to freedom of association and to collective bargaining.

4.2 Inclusion and Diversity

At Stillfront Group, employment and development opportunities must always be based on competence, experience and ability to perform according to our high standards, the expectations of our customers, and in accordance with regulation. Being an organisation with users from all over the world, Stillfront views diversity as a source of competitive advantage.

We are committed to ensuring an inclusive work environment, free from discrimination and harassment based on gender, race, ethnicity, colour, national origin, ancestry, citizenship, religion or other belief, sexual orientation, gender identity or expression, disability, age, union membership, civil status or political beliefs (the “**Grounds of Discrimination**”).

In the event of discrimination or harassment, it is the responsibility of the management to take measures for further investigation and to ensure appropriate disciplinary action in accordance with local policy and applicable law.

When recruiting, hiring, developing and promoting professionals, we are committed to make decisions without taking any Grounds of Discrimination into consideration.

Stillfront Group does not tolerate any discrimination, harassment, bullying or other inappropriate behaviour. This includes comments in general as well as comments based on any Grounds of Discrimination. These values are also applicable to our gaming forums and communities.

5. Environmental Responsibility

Stillfront Group provides digital entertainment classed as digital consumption, in other words there is no physical product in the value chain. However, as part of digital entertainment comes energy consumption as our games are played globally in browsers and on mobile phones, tablets and other devices.

5.1 Waste minimization and recycling

Stillfront Group is committed on reducing our environmental footprint by making efficient

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use of energy and natural resources. We are striving to minimizing and, if practicable, eliminating the use of material that may cause environmental damage and reducing waste generation.

Stillfront Group maintains a high waste diversion for our operations through a combination of waste reduction, reusing and responsible recycling, for all sites, as feasible.

5.2 Measurable Environmental Impact and Goals

The overall goal of our environmental initiatives is to be sustainable by striving for that our business processes should have the lowest possible impact on the environment.

Stillfront Group's environmental work, measurable environmental impact and environmental and other sustainability targets are annually presented in our sustainability report.

6. Stakeholder dialogue

Stillfront engages in close dialogue with its identified stakeholder groups to steer Stillfront's sustainability priorities. Stillfront has identified its material stakeholders to 'Shareholders and Investors', 'Users/Consumers' and 'Professionals/Employees'.

Stillfront educates and engages its professionals in sustainability related matters on an ongoing basis.

7. Document properties

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| Document owner Head of IR, Communication and Sustainability | | |

8. Revision history

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|---------|------------|-----------------|---|
| 1.0 | 2020-12-10 | Initial Version | Sofia Wretman, Head of IR, Communication and Sustainability |
| 1.1 | 2021-09-02 | Annual revision | Sofia Wretman, Head of IR, Communication and Sustainability |
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