

STILLFRONT

GROUP

STILLFRONT GROUP – WHISTLEBLOWING PROCEDURE

Introduction

Stillfront Group AB (publ) (“**Stillfront**”) is committed to high standards of openness, honesty and accountability. In line with this commitment, we expect all professionals, as well as relevant third parties who deal with Stillfront, to come forward and report any risk, malpractice, illegality or other wrongdoing that may affect Stillfront’s or its stakeholders’ interests (a.k.a. whistleblowing).

What can be reported?

Stillfront encourages its employees to report the following through the dedicated whistleblowing channels:

- Breach of Stillfront’s Code of Conduct and other group policies
- Criminal offences
- Endangering of someone’s health and safety
- Failure to comply with any applicable law or regulation
- Any discrimination and/or harassment
- Any attempt to covering up wrongdoing in the above categories

The whistleblowing channel is not meant for general business complaints or grievances about an employee’s personal situation. Such allegations, unless documented that you have tried other channels, will not be investigated.

Each employee that makes a report pursuant to this whistleblowing procedure must ensure that the disclosure is sincere and substantiated. No allegations should be made maliciously or with the knowledge that they are false. Stillfront will regard the making of any deliberately false allegations by any employee as a serious disciplinary offence, which may result in disciplinary action, up to, and including dismissal for cause.

Who can be reported?

The whistleblower procedure as set out herein shall only be used to report wrongdoings conducted by people that hold a leading position or that are key employees within Stillfront. Wrongdoings concerning other persons can be reported through Stillfront's normal internal reporting lines.

How to raise a concern?

Employees can report any concerns through Stillfront's online whistleblower form available at <https://www.stillfront.com/en/whistleblower/> or by sending an e-mail to: whistleblower@stillfront.com.

Employees can also raise concerns by regular mail addressed to the General Counsel (Stillfront Group AB (publ), Att. General Counsel, Kungsgatan 38, SE-111 35 Stockholm).

All reports made will be forwarded to Stillfront's whistleblowing committee consisting of the Chairman of Stillfront's Board of Directors and the General Counsel.

If you are worried about being identified as a whistleblower, you can make a disclosure anonymously either through Stillfront's online whistleblower form, by setting up an anonymous temporary email address or by sending an anonymous regular mail. We treat anonymous disclosures just as seriously as those made openly. However, if you do make a disclosure anonymously, we may not be able to investigate your concerns as effectively.

All concerns reported in accordance with this whistleblowing procedure will be treated consistently and fairly. Stillfront is committed to take all reasonable steps to maintain the confidentiality of the disclosing employee where this is requested, however, please be aware that Stillfront cannot guarantee the whistleblower's confidentiality. We may need to disclose your identity where we are required to do so, for example, by law. For further information on processing of personal data, see our Whistleblowing Privacy Notice.

Routine for handling reported concerns

All issues reported through Stillfront's dedicated whistleblowing channels are investigated by the whistleblowing committee and, if deemed substantiated, appropriate actions will be taken in accordance with applicable laws and regulations.

Victimisation of a disclosing employee is not acceptable. Any instances of victimisation will be taken seriously and managed appropriately.

Whistleblowing Privacy Notice

Information we collect

By reporting a concern under the whistleblowing procedure, you may voluntarily choose to provide Stillfront with personal data about you. Personal data may also be obtained through the whistleblower system in respect of the person alleged for the relevant wrongdoing. The personal data processed may include contact details, professional information, and any other further information that the whistleblower decide to share with us.

Why do we need to collect your personal data?

We have a legitimate interest in processing personal information that you provide for investigating and other actions related to the whistleblowing disclosure that you are making.

What we do with your personal data

Your information will be shared internally with Stillfront's employees in relevant departments in order that we can handle, investigate and respond to your disclosure. We might need to share the information you send to us with third parties, such as government agencies, enforcement agencies and the police if we think it is necessary to do so. There may also be certain circumstances where we are required, by law, to share your information. Your personal data may also need to be transferred outside the European Economic Area. Where the Company transfers Personal Data outside the European Economic Area, Stillfront will ensure that Standard Contractual Clauses have been entered into between the transferring entity and the receiving external party. Alternatively, other safeguards will be put in place prior to such transfers.

We will keep your personal data for as long as Stillfront needs in order to fulfil its obligation with regard to your whistleblowing report.

Further information about how we handle and secure your personal data can be found in our Data Protection and Privacy Policy.

Your rights

You have a number of rights connected to the personal data relating to you that we process, namely the right to:

- request access to your personal data (a so-called "register extract");
- request rectification;
- revoke previously given consent with future effect;
- object to processing which is based on our legitimate interests;
- request that your personal data be erased or that the processing of your data be restricted in some cases; and
- be provided with a copy in a structured and machine-readable format (for data portability) of personal details which you have yourself submitted you under data protection laws.

STILLFRONT

GROUP

To contact us about the above mentioned rights, including making a request for the personal data we hold about you or to make a complaint, please email dpo@stillfront.com. For further contact details see our Data Protection and Privacy Policy.

Data Controller

Stillfront Gaming Group AB (publ), company reg. no. 556721-3078 with registered address at Kungsgatan 38, SE-111 35 Stockholm, is the data controller for the processing of the personal data processed in accordance with the whistleblowing procedure.

More information

Stillfront's Data Protection Officer (Peter Birgersson, Deloitte AB) can be contacted via dpo@stillfront.com and you can also find out more about how Stillfront deals with your personal data via our Data Protection and Privacy Policy.