



# Code of Conduct

Be More Bede

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## A Message from the Chief Executive Officer

For most of us working within Bede, the values and behaviours stated in our Code of Conduct will reflect the way we are already behaving. We want Bede to thrive while doing the right thing at all times.

But that does not mean that we cannot or should not regularly look at the way we behave both with our customers and suppliers and with each other. Bede can constantly keep improving and all of us are responsible for ensuring that we do so.

Our culture at Bede is something to be proud of, and everyone working at Bede has a responsibility to maintain it as we continue to grow and move forward as a company.

Please take the time to read and absorb our Code and consider whether you, your teams or your managers are meeting our Code and how we could be doing better.

Our Code is an important part of what Bede is and seeks to be. We work in a highly regulated industry in which not all our rivals display the same values we see as core to our business. By following the Code we will not only make Bede a better place to work but ensure Bede's future growth and success.

Colin Cole-Johnson Chief  
Executive Officer



# Introduction

The Bede Code of Conduct is a reflection of the company's approach to operations, behaviour and culture. It describes how we put our core values into practice and how those values are used to guide our decision making. It reflects the fact that we operate in a regulated industry and as such, everything we do at Bede will be measured against the highest standards of ethical business conduct.

It is something we want all Bede employees to be proud of and relate to. If you see anything in our Code which doesn't make sense, or doesn't resonate with your personal experience of how Bede operates, you should let us know.

We trust our people to act in the best interests of the business and their colleagues at all times and realise that in most cases common sense will guide you to the right answer - our Code exists as a reference point for any time you are unsure. If it doesn't help you make a decision on how to act you can always come and speak to us through your manager or a member of the People team.

We expect all our employees and Board members to know and follow our Code. It also applies to contractors, subcontractors, consultants and anyone else who may be temporarily assigned to work for or provide services to Bede. Failure to follow our Code can result in disciplinary action, including termination of employment. If you see someone falling short of the standards outlined in our Code, you have an obligation to speak out.



# Values & Mission

Bede's culture and mission to become 'The Safest Place To Play' is underpinned by our core values:

## Pioneering

- We challenge the status quo and embrace change
- Each of us is an innovator with the power to take new ideas forward
- We crave the excitement of the unknown

## Open

- We communicate clearly, openly, and honestly
- We are approachable and actively seek feedback
- We promote a safe and diverse workplace

## Driven

- We keep our promises
- We have a burning desire to deliver great things
- We commit and deliver as one team

Everyone should display behaviour that reflects our values in everything they do and keep them at the forefront of their mind when making personal or business decisions at work.

# What is Expected of Everyone ?

**Everyone is expected to:**

- Understand our Code of Conduct
- Follow the guidelines of our Code in their behaviour and decision making
- Act in line with the company values
- Use common sense and good judgement at all times
- Act in the best interests of the company at all times
- Be nice to people

# What is Expected of Managers?

**Managers are expected to do all of the above, plus:**

- Ensure the people in their team understand their responsibilities under our Code and other company policies
- Act as an advocate for our Code and encourage adoption
- Hold people to account for not following the letter or spirit of our Code
- Create an environment where employees feel comfortable raising concerns
- Consider behaviour in relation to the Code and our values when assessing employee performance and/or effectiveness
- Always encourage employees to use the guiding principles within our Code when trying to achieve business results

# Doing The Right Thing

We expect everyone to make decisions using their common sense and good judgement, using our core values and Code as a guiding principle. If something isn't clear-cut you should use our 'Do The Right Thing' guide to help you decide how to act.

## Step 1

Does it feel right?

## Step 2

Is it in line with our core values?

## Step 3

Would you be happy for someone to know about it?

If the answer to any of these questions is "No" - don't do it.  
If you are still unsure, seek further advice and guidance before acting.



## Diversity, Inclusion & Equality

Diversity, inclusion & equality is part of the fabric of Bede and runs to the heart of everything we do. Our culture encourages, supports and celebrates the diverse voices of our people and we treat people equally, regardless of their level within the company. We actively encourage and embrace people's individual spirit in our day to day operations and hiring process. We want people to be themselves at work and don't discriminate against anyone because of their beliefs, race, gender, age, religion, or identity.

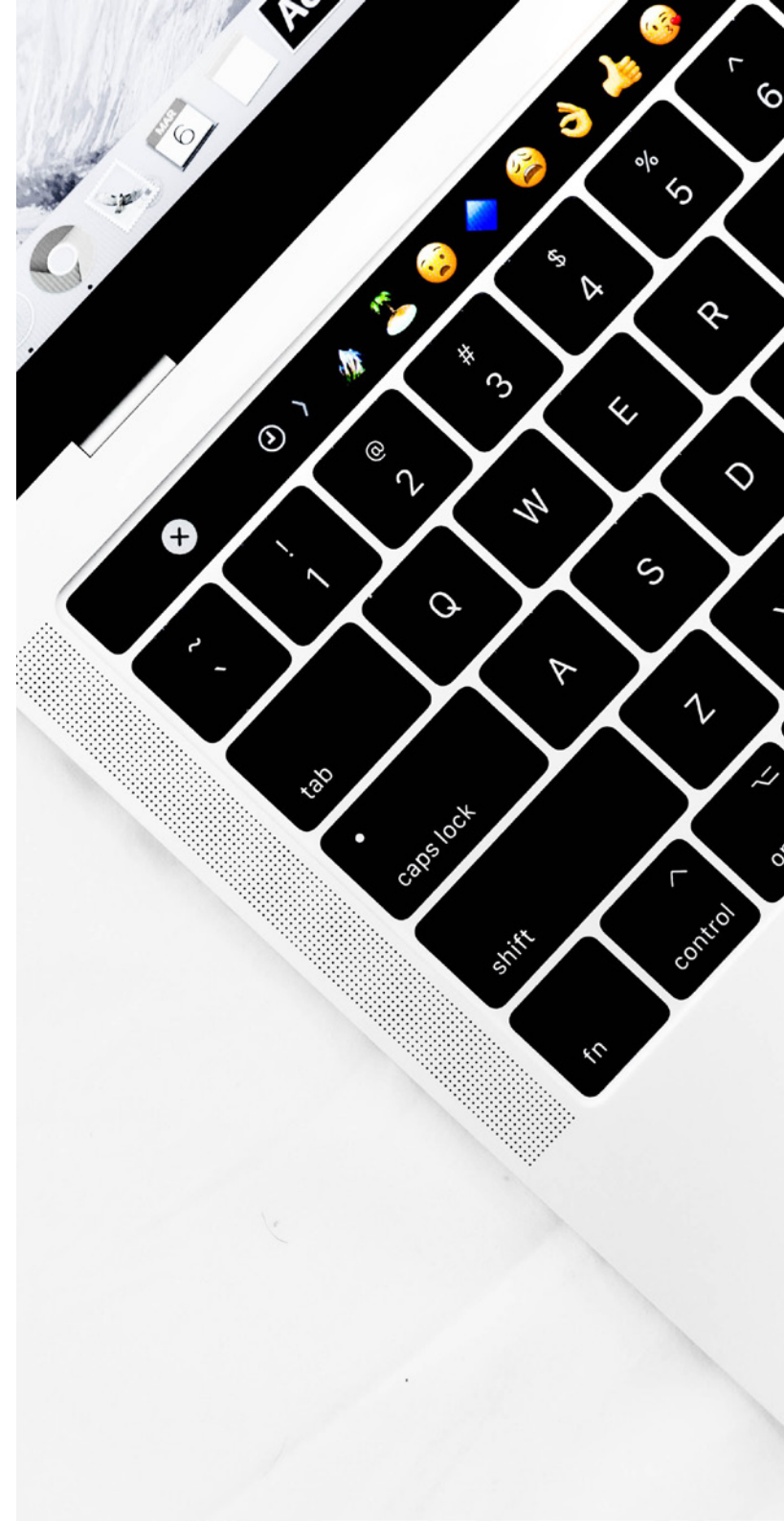
## Harassment & Bullying

We believe everyone is entitled to work in a safe environment and don't tolerate any forms of bullying or harassment in the workplace. We only hire people who share our core values, so would hope that examples of such behaviour are extremely rare. If you see anyone bullying or harassing someone you should tell us straight away. We will treat all matters of this nature extremely seriously and won't be afraid to terminate employment should accusations of bullying or harassment be proven.

## Health Matters

The mental and physical wellbeing of our people is of huge importance to us and we offer a range of support options for our staff as well as an EAP (Employee Assistance Programme) through our private healthcare scheme. Everyone has days where they just don't feel like themselves and we encourage people to come and talk to us about their problems in an open and safe environment. It's okay not to be okay.

Bede wants all staff to have a healthy work-life balance. When you go on holiday you should avoid accessing work email or Slack and enjoy your well earned time off.



# Conflicts of Interest

Everyone is expected to act in the company's best interests. A conflict of interest exists when your best interests interfere or are at odds with the best interests of the company.

Conflict of interest may also arise from your personal relationship with a customer, supplier, competitor or another Bede employee. A conflict of interest would occur in these circumstances if your relationship is deemed to impair your business judgement and cause you to not act in the best interests of Bede.

Our Board members, Directors and Executive team, as the main decision makers in the business, are particularly at risk but all staff should be aware that they are prohibited from using corporate property, resources, information or their position for personal gain.

The best guiding principle for any situation that may present a conflict of interest is to “abstain and disclose”. If it is not possible to avoid the event or activity which is creating the conflict of interest, or you are unsure whether an activity or action constitutes a conflict of interest, you should speak to your manager who will escalate appropriately.





# Financial Integrity & Responsibility

Everyone at Bede is expected to act responsibly and use good judgement in matters involving company finances. If you spend company money in the course of your duties you are expected to keep accurate and complete records and submit accurate claims as and when required. For clarity on anything relating to spending company money, expenses or travel you should contact our Finance team.





# Confidential Information

Company and client confidential information must be protected at all times. You should use such information for business purposes only and keep it in strict confidence. This applies to both internal information and any information obtained via third parties or non-disclosure agreements.

Please keep in mind that the results of improper use or disclosure of confidential information could have a detrimental effect on Bede's reputation, expose us to liability and cause harm to the business. Any individual found to have deliberately misused confidential information may be liable to disciplinary proceedings which could lead to a criminal prosecution.



# Responsible Gambling

Our vision is to become 'The Safest Place To Play' and as such we take a proactive stance in developing tools and products to help combat and detect problem gambling. We work closely with our operators to understand the complexities of their particular jurisdiction and partner with them to ensure our products take a 'compliance first' approach.

It is our responsibility as an employer to promote safe and responsible gambling to our staff and we take this very seriously through educational training and information sessions to keep them informed of some of the latest thinking in that area. We also offer friendly and confidential advice to anyone who wants to come and talk to us about their gambling and where appropriate we'll support them in getting some professional help.

## **All Bede employees are expected to reflect the company's approach:**

- Gamble responsibly and within their means
- Seek specialist help if the problem becomes more serious
- Actively intervene if they suspect a colleague may have a problem

# Restricted Gambling

All Bede staff are prohibited from using products owned or controlled by any of our customers, outside of their responsibility to test and diagnose issues with live services. This restriction applies to both online and retail operations of any kind and extends to all products owned and operated by the Gauselmann Group.

An entire list of restricted products and sites can be provided by the People team.

## Data Protection (GDPR)

Bede uses the General Data Protection Regulation (GDPR) as our standard for data protection across the business. We comply with its requirements and, as a global organisation, also recognise there may be national differences to also take into account.

In your role at Bede you may have access to systems or tools which allow you access to personal or user data. We expect that you only use this access to process data which is necessary for you in the performance of your role. It is not acceptable to 'go digging' for data that isn't necessary for you in your day-to-day role. Where you do have access to such information, you must treat it with sensitivity and caution as it is confidential and subject to strict privacy protections. For more information on this area you can contact our Data Protection Officer.

## Security

Bede operates in a secure way. We maintain certification to the ISO/IEC 27001:2013 standard which demonstrates our commitment to security and offers comfort to regulators, clients and prospective clients. Certification to this standard covers all areas of information security - Confidentiality, Integrity and Availability - it is the responsibility of all at Bede to ensure that any instances which may impact on information security are reported to Bede's Information Security Officer.

## The Law

All Bede employees are expected to act within the bounds of all applicable law and regulations of any country in which we operate or do business. How these laws are applied can be complex and dependent on specific facts - we recognise that it is unrealistic to expect people to know them inside out. If you have any questions about the interpretation or application of any law, rule or regulation you should contact our Legal team.

# Violations & Reporting Misconduct

Any violation of our Code will be taken very seriously and it could lead to the termination of employment. All Bede employees are obligated to call out any behaviour which they feel doesn't align with the guidance in our Code. If you are unsure whether or not someone's actions constitutes a violation of our Code, you should report it (hint: if it doesn't feel right, it probably isn't....).

The first step in reporting anything is to speak to your manager. Often talking it through will lead to a satisfactory resolution.

If this isn't the case, or you don't feel comfortable approaching your manager (or your report is about them!) you should email [info@rechtsanwalt-quedenfeld.de](mailto:info@rechtsanwalt-quedenfeld.de). Someone will contact you to arrange a meeting to go through your case in more detail. All cases will be dealt with in the strictest confidence.

We have an open door policy on reporting violations and would encourage people not to anonymise themselves when raising an issue - it makes proper investigation more difficult or even impossible if we can't contact you to obtain further details on the case. Anyone concerned about preserving their identity can speak directly to the whistleblowing officer who will take steps to preserve confidentiality.

For further details on anything relating to disclosure, reporting or whistleblowing you should contact our Whistleblowing Officer.