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ZEAL NETWORK SE

Modern Slavery Act Statement

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1 Zero-tolerance for Modern Slavery and Human Trafficking

ZEAL Network SE ('ZEAL'), the parent company of ZEAL Group, is making this statement pursuant to section 54 of the Modern Slavery Act 2015 (the "Act") and constitutes ZEAL's slavery and human trafficking statement for the financial year ended 31 December 2023. We are fully supportive of the Modern Slavery Act 2015 as forced, bonded, or compulsory labor, human trafficking, and other forms of slavery and servitude are among the most severe violations of human rights within any community. We reject all manifestations of modern slavery, human trafficking, or forced labor and we are dedicated to identifying and addressing these risks diligently. This Statement is to be considered in conjunction with our ZEAL Code, which sets out our standards on ethical business practices.

2 Our area of Business

ZEAL Network SE, the parent company of ZEAL Group, is headquartered in Germany with subsidiaries in London. The Group specialises in the area of online lottery. We offer consumer facing lottery-based games as well as business to business solutions. The Group employs approximately 250 people in Germany, Spain and the United Kingdom. Further detail on the structure and performance of the Group can be found in the Strategic Report section of the Annual Report and Accounts, which is published on the Group's website.

3 Policies and Processes in relation to Modern Slavery and Human Trafficking

As we are committed to acting ethically in all our business operations, we operate a group-wide Ethics and Compliance Management System, which also serves to prevent modern slavery and human trafficking in our supply chain. There are a number of constantly reviewed and improved policies and processes which are paramount for living up to this commitment, such as our ZEAL Code for employees and business partners, our recruitment procedure, regular risk management reporting cycles, our business partner due diligence process, and our whistleblowing channels.

3.1 Risk in our area of Business

When we consider our recruitment processes and qualifications needed to perform those roles in combination with the prevalence of forced labour in the countries in which we operate, the risk of slavery or human trafficking occurring within our direct employee population is very low. Also the risk assessment of our suppliers, considering factors like location and nature of goods and services, indicates an overall low risk of modern slavery or human trafficking. Some roles within the Group are performed by the employees of third-party contractors. The nature of these roles and the limited visibility of our contractors' recruitment processes could increases the risk of slavery or human trafficking. Manufacturers of branded items sold by the business or used by our staff in performance of their duties or suppliers of foods and drinks we offer in the offices might also operate in countries with a higher prevalence of modern slavery and a higher likelihood that unskilled, low skilled or vulnerable groups are involved in manufacturing these goods.

3.2 Due Diligence process

To further reduce any of these potential risk, we strive to constantly improve our business partner due diligence processes also to ensure that human rights are respected not only by us and our direct partners, but along the entire value chain. Just as we appropriately check the parties we intend to do business with, we expect our business partners to conduct appropriate due diligence in their own supply chain. We reserve the right to conduct audits or request further information from third parties we do or intend to do business with to evaluate their compliance with labor standards and slavery and human trafficking legislation.

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4 Whistleblowing Management

Employees, suppliers or other third parties who become aware of any issue which may breach our standards are encouraged to raise the matter using our Whistleblowing channels which we operate according to the German Whistleblower Protection regulation. We even provide the possibility to report anonymously through our Whistleblowing tool on our website.

5 Training and Communication

Our ZEAL Code summarizes our standards and expectations with regard to ethical behavior when doing business. It also addresses human rights and their importance. Acknowledging the Code is obligatory for all our employees and part of our onboarding process. Where necessary we also make it part of supplier contracts. The Code is also available on our website for any other interested third party. In addition, we constantly update and modernize our trainings on all matters related to Ethics and Compliance, which naturally includes human rights. To make the topics more accessible, we intend to launch a video campaign in the course of 2024. We foster a strong speak-up culture in our company and while we can receive reports on Compliance breaches through our Whistleblowing system, we also invite all employees to raise general concerns and ask questions using dedicated channels.

6 Assessing our Effectiveness

Although we consider our business to be at a relatively low risk of modern slavery, we will keep the issue under review on an annual basis and respond accordingly. There are several performance indicators that measure the effectiveness of our Ethics and Compliance program and the prevention of modern slavery and human trafficking in our supply chain:

- Number of relevant reports received through our Whistleblowing system (none).
- Number of relevant questions or concerns submitted through our dedicated channels (none).
- Number of employees who successfully completed our Compliance Trainings (mandatory for all).
- Number of risks detected during our supplier due diligence processes (none).

7 Approval for this Statement

This statement was approved by the Executive Board on 24th May 2024.

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