

**Kambi**

# **Modern Slavery Act Transparency Statement**

2026

## The Statement

### Introduction

Kambi Group plc (hereafter “Kambi”, “we” or “our”) makes this statement pursuant to Section 54 of the UK Modern Slavery Act 2015 on behalf of all group subsidiaries.

It sets out the steps we have taken during the financial year ending 31 December 2025 and our commitment to prevent modern slavery from taking place in our supply chain or in any part of our business.

### The Organisation

Kambi is a leading business-to-business supplier of premium sports betting services to licensed business-to-consumer gaming operators.

We employ over 1000 people across offices in Sweden, the United Kingdom, the Philippines, Romania, Malta, the United States, Australia and Denmark.

The principal activities of Kambi are the provision of sports betting services – which are highly regulated – to licensed gambling operators, as well as esports data to companies in and outside the gambling industry.

We have focused on creating a socially responsible business since day one, through our operations in regulated markets, and we have a zero-tolerance approach to modern slavery and human trafficking in our business operations or throughout our supply chain.

### The Supply Chain

Our business model requires building stable, long-term relationships with our suppliers and clients.

The industry in which Kambi operates relies primarily on data inputs and technological services to provide its services. Kambi's most important input is sports event data, which is sourced from companies that also operate within the sports betting ecosystem, under the scrutiny of multiple regulators across the globe. Kambi also engages suppliers of data centres, network services and hardware. In addition, our supply chain includes ancillary goods and services providers such as cleaning services and office supplies.

### Our Policies in Relation to Modern Slavery

All Kambi employees and contractors are made aware of the Kambi Code of Conduct upon joining, which consists of a number of policies setting out each employee's responsibilities regarding ethics, information security, privacy, anti-bribery and corruption, insider information and conflicts of interest.

The Code of Conduct is accompanied by the Kambi Whistleblowing Policy, which encourages all employees and contractors to report any suspected wrongdoing as soon as possible by providing guidance as to how to raise such concerns and by ensuring that no employee suffers injustice as a result of reporting a suspicion that a legal breach has occurred or may take place in the future. Our Health and Safety Policy aims to create and maintain a safe and healthy working environment, by taking all reasonable steps to avoid, reduce or control any foreseeable risk to the health and safety of any person. Kambi has solid controls in place to ensure that all employees and contractors are engaged in accordance with applicable laws. The vast majority of Kambi's employees are employed directly, without the use of third parties, so Kambi has full control over their working conditions.

Breaches of the Kambi Code of Conduct and/or any Kambi policies or procedures are handled under the disciplinary process applicable for the specific location where the employee or contractor is employed and handled according to applicable laws.

### Due Diligence

Kambi performs due diligence on its clients as part of its onboarding and risk management procedures, as well as monitors legal and ethical risks that may arise from time to time, including those related to modern slavery. Our due diligence process includes thorough background checks, reputational screening and

adverse media review. Risk level is assessed on a case-by-case basis and dictates renewal cycles, with renewals also being triggered by ad-hoc events of relevance.

Further to conducting due diligence on gaming suppliers and partners, in 2025 Kambi has extended due diligence scope to encompass relevant non-gaming suppliers as well.

### Risk Assessment and Risk Management

Kambi assesses the risk of modern slavery and human trafficking within its operations on an ongoing basis. We operate in jurisdictions that are generally assessed as lower risk, and although the Philippines presents comparatively higher inherent risks due to structural factors such as economic inequality and vulnerability to labour exploitation, the jurisdiction counts with a strong legal and regulatory framework and active local government oversight and enforcement. Further to that, Kambi's direct employment model enables full oversight of working conditions and adherence to internal policies and applicable labour laws.

From a supply chain perspective, given (i) the software-as-a-service nature of its business, (ii) the nature of the suppliers Kambi engages with, and (iii) the type of clients Kambi provides its services to, the company continues to assess the risk of slavery and human trafficking as low. The majority of Kambi suppliers provide services from jurisdictions with a strong rule of law with a low prevalence of modern slavery (European countries and the United States).

In 2025 Kambi also rolled out a Compliance Plan and implemented a Compliance Committee, which is composed of members of the C-suite and an independent external member. The Compliance Plan formally establishes procedures for probity review of clients, suppliers and employees. The Committee has an appointed Compliance Officer who produces a quarterly report covering breaches of company's policies, including the Code of Conduct, along with any whistleblowing reports and complaints that may arise, and the Committee meets quarterly to discuss such report and any other matters of interest. The Compliance Plan and Committee thus establish another level of oversight of Kambi's operations and ensure that compliance continues to be at the heart of everything that we do.

No modern slavery incidents, allegations or whistleblowing reports were identified in the reporting period.

### Awareness

At the commencement of employment, training and documentation is provided to help employees understand the underlying principles, objectives and practical implications of the Kambi Code of Conduct.

Our company-wide learning and development programme contains an online course available to all our employees to create awareness of anti-modern slavery and human trafficking practices and give employees the tools they need to take action if they are concerned.

### Looking Ahead

As a fast-growing organisation with a growing pool of suppliers, we need to be particularly aware of any risks that may emerge in our operations and supply chain.

Over this year, our focus will be on further assessing our procurement procedures and due diligence processes and awareness activities to ensure relevant risks are appropriately mitigated.

*This statement was approved by the Board of Directors of Kambi Group plc on 21 May 2026.*

**Anders Ström**  
Chairman of the Board of Directors of Kambi Group plc.

