

## BRIBERY AND CORRUPTION POLICY

This policy sets out GGR Group's (the Company) stance on the implementation and management of anti-bribery and corruption measures across the Group's business operations in accordance with the Code of Ethical Conduct and the UK Bribery Act 2010.

The Company acts with the highest standards of integrity and honesty in all it does; adherence to best practice governance, controls and compliance are essential for helping customers to have confidence when entrusting their business to the Group. The Company also recognises that bribery and corruption have an adverse effect on communities wherever they occur and is committed to enforcing high moral and ethical standards in all business activities

The action and conduct of Company officers, Directors and employees (collectively Company personnel) as well as others acting on the Company's behalf are essential to maintaining these standards. To that end, all Company personnel, including agents, consultants and contractors as well as suppliers involved in the Company's business must read, become familiar and comply with this Bribery and Corruption Policy.

It is Company policy to comply with all laws, rules, and regulations governing anti bribery and corruption law, in all the countries where we operate. The Company has a zero tolerance approach to acts of Bribery and Corruption, by employees or anyone acting on our behalf. Any breach of this policy will be regarded as a serious matter by the Company of which is likely to result in disciplinary action.

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment. If the company is found to have taken part in the corruption or lacks adequate procedures to prevent bribery, it could face an unlimited fine and, be excluded from tendering for Government contracts and face untold damage to its reputation.

The payment or offer to pay bribes, or provisions of, or offer to provide gifts or anything of value for improper purposes, to obtain or retain business or any other benefit, (whether for the Company or any other party) is prohibited. Such payments or gifts are also forbidden under the terms of this policy and may result in immediate dismissal for those involved in their payment or receipt.

The Company is required to keep financial records and to have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

This policy applies to individual employees, agents, sponsors, intermediaries, consultants or any other people or bodies associated with the Company or any of its subsidiaries and employees. Bribery is committed when an inducement or reward is provided, in order to gain any commercial, contractual, regulatory or personal advantage for the Company or another party. Corruption is the abuse of entrusted power for personal gain.

No bribes of any sort may be paid or accepted from customers, suppliers, politicians, government advisors or representative's private person or Company. It is not permitted to establish accounts or internal budgets for the purpose of making facilitation bribes or influencing transactions.

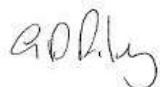
The Company recognises that to refuse a gift in certain circumstances and/or countries and cultures would cause offence to our trading partners and jeopardize the continued working relationship. The test to be applied in all circumstances is whether the gift or entertainment is reasonable and justifiable.

This policy does not prohibit the following practices providing they are customary in a particular market, or are appropriate and properly recorded.

Normal and appropriate hospitality (given or received). The giving of ceremonial gifts on a festival or at another special time, e.g. Christmas, up to and not exceeding the value of 150 Euros.

This policy must be communicated to all employees and sub-contractors and will be reviewed annually as part of the Management review process, to ensure its continued relevance and adequacy. This policy is available to the public and all other interested parties on request.

**GD Riley**  
**Chief Executive Officer**

A handwritten signature in black ink, appearing to read 'GD Riley', written over a light grey rectangular background.

**Date** 19 October 2021