



Gentoo Media Inc.
15 June 2026

Sustainability Report 2025



Foreword by the CEO

Navigating Progress with Precision and Resilience

The 2025 fiscal year marked a significant milestone for Gentoo Media. It was our first full year operating as a standalone, pure-play affiliate leader following our strategic separation from GiG in late 2024. While 2024 was defined by rapid structural change and rebranding, 2025 has been a year of steady progress and operational excellence. Our focus shifted from building the ship to steering it with greater discipline, data-driven precision, and a renewed commitment to long-term sustainability.

Governance and Ethics as Our Foundation

In March 2025, we established a dedicated ESG and Compliance Committee to provide the Board with direct oversight of our sustainability agenda. We didn't stop at committee structures; we operationalized our ethics through the successful rollout of a Group-wide Whistleblowing Management System and a centralized Incident Register in Q4 2025. These tools empower our people and ensure that our zero-tolerance stance on corruption is backed by robust, anonymous reporting channels.

Data-Driven Environmental Action

Transparency requires data, not just ambition. This year, we partnered with Greenly to complete a comprehensive measurement of our Scope 1, 2, and 3 greenhouse gas emissions. By conducting a deep-dive analysis into our cloud infrastructure and energy consumption, we

are establishing the verified metrics necessary to set meaningful carbon reduction targets for 2026 and beyond.

People and Purpose

Our success is entirely driven by our people. With 340 employees representing 47 nationalities, we maintained an impressive near-equal gender balance of 49% female and 51% male. While we celebrate this, we remain focused on our target of 50/50 gender representation in management. Beyond our internal team, we used our platform to drive external impact, raising a record-breaking €135,000 for medical and social inclusion charities during the AskGamblers Charity Night.

Looking Ahead

As we enter 2026, Gentoo Media is a leaner, more focused, and more resilient organization. Our Antarctic-inspired heritage reminds us that resilience isn't just about surviving change- it's about thriving through it. By embedding ESG principles into our corporate governance and commercial strategy, we are building a sustainable digital storefront for the iGaming industry that delivers value to our partners, our people, and our shareholders alike.

Sincerely,

Jonas Warrer

Chief Executive Officer



1.0

Scope & Methodology

This non-financial disclosure for the fiscal year ending 31 December 2025 has been prepared on a consolidated basis, which includes the sustainability statements of the reporting undertaking, Gentoo Media Inc. (the “Company” or “Gentoo Media”), and its subsidiaries (the “Group”).

The scope of consolidation remains aligned with the Group’s financial statements in accordance with the International Financial Reporting Standards (IFRS) as well as Article 48i of Directive 2013/34/EU. In this respect, all subsidiary undertakings included in the consolidation are exempted from individual or consolidated sustainability reporting pursuant to Articles 19a(9) or 29a(8) of Directive 2013/34/EU. This accounts for Gentoo Media Inc. and its subsidiaries.

Identifying Material Non-Financial Matters

To ensure the transparency and strategic relevance of our reporting, Gentoo Media utilizes a Double Materiality Assessment (DMA) to identify and prioritize matters significant to the Group’s long-term success and stakeholder interests. This comprehensive assessment provides insight into our performance and impact regarding environmental, social, employee, human rights, and anti-corruption matters.

Our materiality assessment is driven by the following structured factors:

/ Business Model and Strategy: An analysis of our core goals, management approach, values, intangible assets, value chain, and principal risks.

/ Stakeholder Engagement: Direct consultation with internal leadership and affected stakeholders—including shareholders and prospective investors—to ensure disclosures align with their concerns and expectations.

/ Sectoral Landscape: Identification of material sectoral issues affecting our competitors, customers, and suppliers.

/ Impact Analysis: Evaluation of the actual and potential severity and likelihood of impacts arising from our services and business relationships.

/ Regulatory Environment: Ongoing monitoring of public policies and global gaming regulations.

This assessment is further refined through desk-based research, management feedback, and the analysis of our latest financial results to identify key revenue streams and business relationships. Through this governance framework, we aim to provide a transparent account of

our sustainability journey and our contribution to a more ethical industry future.

In this respect, the table below is intended to provide insight into our development, performance, position and impact of our business activities with regards to material non-financial matters, specifically environment, social and employee, human rights, anti-bribery and corruption, business integrity and responsible business practices, and other relevant sectoral matters related to our supply chain.

Non-financial matters	Disclosures
Environmental matters	/ Environmental impact from energy use; / Direct and indirect atmospheric emissions; / Waste management; / Environmental impact from transportation or from the use and disposal of products and services.
Social and employee matters	/ Business Integrity & Responsible Business Practices; / Employee Matters; / Community relations & CSR initiatives.
Respect for Human Rights matters	/ Human Rights
Anti-bribery and corruption matters	/ Business Conduct/Ethics; / Protection of Whistleblowers.

2.0

Sustainability governance

Our sustainability governance framework ensures accountability, oversight, and effective implementation of ESG initiatives across the organisation.

Board Oversight: The Board of Directors provides strategic direction and oversight of our sustainability agenda, ensuring alignment with our corporate values and long-term business objectives that drive sustainable growth and stakeholder value.

ESG and Compliance Committee: On 10th March 2025, an ESG and Compliance Committee was established with the scope of providing guidance and advice to the Board on sustainability and compliance matters. This Committee comprises two Board members, the General Counsel and the Head of Compliance. It plays a crucial role in:

- / Monitoring regulatory developments and compliance with sustainability-related requirements;
- / Assessing ESG risks and opportunities, ensuring alignment with best practices; and
- / Overseeing stakeholder engagement and sustainability reporting.

ESG Leadership and Implementation: As the lead on Sustainability within the Company, the Head of Compliance works closely with internal teams and external stakeholders to understand current impacts, risks and

opportunities and drives the sustainability strategy across the Company. Key responsibilities include:

- / Driving ESG initiatives across business functions;
- / Keeping abreast with ESG developments at an EU and national level, and ensuring compliance with ESG regulations, industry standards, and voluntary frameworks;
- / Monitoring progress and performance through key ESG metrics; and
- / Preparing and presenting sustainability reports to the ESG and Compliance Committee and the Board on a quarterly basis.

Through this governance framework, we are committed to transparency, continuous improvement, and meaningful action in our sustainability journey. By embedding ESG principles into our corporate governance, we aim to create long-term value for our stakeholders and contribute positively to the environment, society and our employees.



3.0

Non-financial statement

In accordance with Article 19a of Directive 2013/34/EU which outlines requirements for non-financial disclosures, we are hereby providing an overview of our business model with the intent of providing context to our non-financial statement. This is followed by the disclosure of the material non-financial matters that affect key stakeholder groups. In this regard, a thorough assessment of key activities, value chain actors and material risks arising in the value chain was carried out through discussions with top management and reference to financial results to identify revenue streams and business relationships.

3.1 Business model

Our primary focus is to expand our business year-on-year through organic growth, forging new partnerships and exploring strategic acquisitions. As the gambling affiliate industry continues to evolve through significant changes in the regulatory landscape, we are committed to staying ahead by identifying and seizing opportunities that drive sustainable long-term value. Our team remains dedicated to strengthening our market position while ensuring operational excellence across our businesses.

Business environment

As a gambling affiliate marketing company, the Group promotes its partners to drive traffic to their sites, earning a commission in return. Our core marketing services are delivered through two main verticals – Publishing and Paid

Search – which contribute to organic and inorganic growth, respectively:

/ Publishing – This product line leverages Gentoo’s assets to promote partners. Its focus is on platform performance enhancement, improved search visibility, and seizing growth opportunities across its key assets.

/ Paid Search – This product line concentrates on data-driven media buying, continuous optimisation of bidding strategies, and further advancements in automation.

Both product lines share an identical value chain, encompassing both the supply chain and downstream activities. Key supply chain actors primarily include search engines and social media channels.

Compensation for these services is structured across various models, including fixed monthly payments, fixed fees based on the amount of traffic driven to the operator site (“cost per acquisition”), revenue share (a percentage of deposits made by referred leads), or hybrid combinations of these models.

Organisation and structure

The Group’s workforce largely consisted of direct employees spread across five locations (Malta, Denmark, Serbia, Spain and England), as well as freelancers that work remotely and are generally engaged on a project basis. Group assets

include intangible (digital) assets (such as, internet domains and social media pages), intellectual property, internal IT infrastructure (hardware) and proprietary software (SiteBee). In turn, these enable the provision of marketing services to customers (and other downstream value chain actors) via client-facing entities within the Group, these being Innovation Labs Limited, Innovation Labs do Brasil Ltda, AskGamblers Limited, Kafe Rocks Group, Rebel Penguin ApS and BE Marketing Ltd.

Markets and operations

The Group operates across a number of jurisdictions, globally, in both regulated and unregulated markets. The provision of affiliate marketing services is regulated in certain jurisdictions and, in this respect, the Group holds affiliate licenses in Romania, Greece and some US states (Arizona, Colorado, Indiana, New Jersey, Massachusetts, Michigan, Virginia, Washington DC, West Virginia and Pennsylvania), which may in turn regulate the revenue streams that can be availed of by the Group. Such is the case in the US, where the allowable revenue streams are determined according to the level of authorisation available in a particular state and granted to the affiliate applicant. Generally, vendor minor licenses (or “registrations”) permit fixed fee payments (on a monthly basis and/or on a cost per acquisition basis) whereas vendor major licenses allow both fixed fees and revenue share compensation deals.

Through its own operations (including its workers), the company services its key stakeholders in the downstream value chain, these being the company’s partners (i.e. online gambling operators) who in turn provide the end users in the value chain (i.e. players) access to a gambling platform across several regulated and unregulated markets.

Gambling authorities play a key role in the downstream value chain and have a crucial, (in)direct impact on our business operations. Excluding the regulators that directly regulate affiliates (thus directly imposing regulations and periodic reporting obligations), gambling authorities world-wide generally regulate B2C licensees (i.e. online casino/sportsbook operators) which hold liable all licensees for any third-parties engaged by them for services made on their behalf. As a result, Gentoo and its competitors are also indirectly regulated with respect to advertising regulations and obligations to advertise lawful and authorised gambling.

Given the highly dynamic and regulated industry we operate in, where regulation varies world-wide, the interplay between regulators, B2C licensees and affiliate marketing companies requires us to adopt efficient and effective operational change management procedures to quickly adapt and comply with new regulatory developments and requirements.

3.0 Non-financial statement

Objectives and strategies

Given the highly regulated landscape we operate in, our objectives are driven by our diversification strategy whilst committing to legal and regulatory compliance, to consistently drive high-quality traffic to various partners across different gaming verticals and jurisdictions and across both high-performing and emerging assets, generate revenue and maximise shareholder returns, whilst giving high regard to the risks of gambling and gambling addiction especially to minors and vulnerable individuals and ensuring that these are prioritised.

Here's how we fit these considerations into practice:

/ Maintain strong partnerships with responsible operators that are transparent and promote trustworthiness;

/ Work towards maintaining revenue share agreements to secure recurring revenue streams with high earnings potential via compounding effect, as revenue from operators grow over time;

/ Optimise the performance of advertising campaigns through quality content designed by our team to contribute to a higher ranking on Google and other search engines;

/ Uphold the highest standard of business conduct through compliance with legal and regulatory standards thus

avoiding penalties, sanctioning and ensuring long-term business sustainability;

/ Brand awareness and reputation management;

/ Expand market reach;

/ Promote responsible gambling practices, raise awareness of gambling addiction risks and provide access to help and support services;

/ Engage in ethical marketing by promoting content that targets individuals of legal gambling age and avoiding the use of imagery, characters and text that appeal to minors and vulnerable individuals.

Ultimately, our objective is to create a winning situation for all stakeholders including ourselves, our partners and our shareholders and investors through a long-term, sustainable business.

Factors that affect the Group's future development

The table below outlines risk factors inherent to the business:

Factors	Potential impact
<p>Geopolitical, societal factors</p> <p>Adverse instability and/or uncertainty (e.g., political instability, conflicts, trade wars, pandemics or disease outbreaks, labor and/or infrastructure-related risks, etc.)</p>	<p>Negative</p> <p>Financial loss, due to a reduction in players' disposal income leading to less demand for online gambling</p>
<p>Acquisitions</p> <p>As part of the Group's growth strategy, the Group continuously considers the acquisition of other companies or assets.</p>	<p>Positive</p> <p>Acquisitions may complement or expand the Group's existing business and create economic value to shareholders.</p> <p>Negative</p> <p>/ Reduction in the general oversight on existing business as management diverts attention and resources to the integration of the new business.</p> <p>/ Challenges derived from maintaining relationships with employees and customers of acquired business which may lead to a loss of key employees and customers.</p> <p>/ Increasing demands on the Group's operational systems.</p> <p>/ Difficulty in integrating shared services with the Group's existing business, higher than expected employee severance or retention costs, overhead expenses and delays in anticipated timing of activities related to any cost-saving plans.</p> <p>/ High integration costs with potential adverse effects on the Group's reported operating results, particularly during the first few reporting periods after such acquisitions are completed.</p> <p>/ The inability to integrate and implement effective disclosure controls and procedures for financial reporting within allowable time frames.</p> <p>/ Potential unexpected liabilities that the Group failed, or was unable, to identify in the course of performing due diligence on historical and/or future acquisitions.</p> <p>/ Challenges associated with building a unified corporate image.</p>
<p>Licensing</p> <p>Increasing international gambling market fragmentation into national markets with a multitude of different regulatory requirements.</p>	<p>Positive</p> <p>Positive impact creating new market opportunities, with controls that safeguard the business and market sustainability.</p> <p>Negative</p> <p>The loss of, or failure to obtain additional licenses (including failure to obtain renewal of any licenses), the reduction of the addressable market under an existing professional license and/or failure of satisfying any conditions/terms under any existing licenses could have a material adverse effect on the Group's business, financial position, profits and prospects.</p>

Factors that affect the Group's future development – continued

Factors	Potential impact
<p>Legal and regulatory compliance</p> <p>The regulation of online gambling is extensive and varies significantly world-wide. Regulation is always subject to change, particularly when political factors come into play (such as, a change in governance).</p>	<p>Positive</p> <p>Regulation and enforcement create long-term opportunities for online gambling operators that operate with integrity and the highest standards of business conduct, thereby leaving little to no room for those that may harm end users (players) and tarnish the industry's reputation.</p> <p>Negative</p> <p>Adverse impact on the Group's financial performance due to potential penalties arising from non-compliance to new legislation, especially around social responsibility obligations, including more stringent regulatory conditions, advertising and responsible gambling regulation.</p> <p>Regulatory changes may also have an indirectly adverse effect on the Group by restricting customers' use of gambling websites, or by requiring financial institutions to prevent transactions between customers and gambling operators. This may lead to a complete pull-out from the markets in which the Group operates today.</p> <p>Regulatory changes may also involve the complete regulation of online gambling in a previously non-regulated target market, which would require the Group to meet regulatory requirements and to stop servicing unauthorised operators. This may have an adverse effect on the Group's financial position due to new compliance costs and loss of business.</p>
<p>Competition</p> <p>Competition faced by existing and new competitors, which is further characterised by the industry's adoption of technological advances, new product offerings and evolving customer requirements.</p> <p>Increased risk in competition when entering newly regulated markets due to competition with incumbent affiliates.</p>	<p>Positive</p> <p>Opportunity to continue developing the Group's service offerings to further strengthen its position in the market.</p> <p>Negative</p> <p>Lower end customer reach and reception if the Group does not remain attractive through new product offerings, intriguing advertising campaigns, maintain good relationships with its suppliers and customers and having the resources in place to sustain its development and growth and to remain relevant in the market. pleted.</p>
<p>Talent</p> <p>The Group's success is driven by, and is largely dependent on its ability to recruit, train and retain key personnel such as the Board of Directors, the CEO, the rest of the management team and certain skilled specialist employees, particularly operational and technical personnel.</p>	<p>Positive</p> <p>Our employees are the heart of the business. The retention of key roles is pivotal to ensure that knowledge is retained and further developed within the Group. Nonetheless, the integration of new talent may bring in fresh perspectives, especially senior management roles who may positively contribute to solving legacy issues and new, strategic approaches..</p> <p>Negative</p> <p>Failure to hire and retain key employees or to integrate new talent to supplement the existing team could affect the Group's ability to successfully implement its business objectives which may adversely affect its financial performance.</p>

Factors	Potential impact
<p>Third-Party Exposure</p> <p>The Group holds agreements with external providers, including, marketing partners (such as, advertising networks and digital tabloids), service providers (such as, search engines), customers (online casino / sports betting operators) and its development, performance and position is largely dependent on the integrity, performance and relationships with all third parties.</p>	<p>Positive</p> <p>Reliable third-parties across the entire value chain provide strong business relationships based on mutual trust and respect and effective resolutions, thereby fostering long-term collaboration which</p> <p>Negative</p> <p>The Group is exposed to risk of financial loss and financial crime (ML/FT) risk, specifically, from its customers. Financial risk is derived from clients that refuse to honour payment terms, while ML/FT risk is derived from the clients' own corporate structures, operations in jurisdictions with weak enforcement and lax controls, involvement of politically exposed persons (PEPs), and the presence of sanctioned key company individuals. These risks, if materialised, can have a detrimental effect on the Group's reputation.</p>
<p>International Operations</p> <p>The Group operates world-wide in a number of jurisdictions.</p>	<p>Positive</p> <p>Market and customer diversification which compensate for negative effects, such as reduced business activity in some regions (for example, due to seasonal effects, regulatory changes) and market pull-out by customers.</p> <p>Negative</p> <p>International operations are subject to a variety of risks, including the overlap of different tax regimes, differing legal and regulatory requirements, fluctuations in currency exchange rates, localisation of service offerings and reduced protection for intellectual property rights in some jurisdictions.</p>
<p>Supply Chain</p> <p>Dependency on key suppliers, such as search engines.</p>	<p>Positive</p> <p>Search engine updates may improve our rankings on search engines, which may result in a greater reach and customer conversion.</p> <p>Negative</p> <p>Search engine updates may significantly disrupt rankings which in turn may significantly result in a loss in revenue. Further information is provided in Section 8.</p>
<p>AI Risk</p> <p>he company faces risks related to the rapidly evolving AI landscape, including potential regulatory changes, ethical concerns regarding data usage and algorithmic bias, and the competitive pressures of integrating sophisticated AI tools into our products and services.</p>	<p>Positive Outcomes:</p> <p>AI integration is expected to yield significant benefits, including greater operational efficiency through automated workflows and tasks, leading to reduced costs and faster delivery. It will drive product and service innovation by enabling the development of new, highly personalized, and intelligent offerings. Furthermore, it will strengthen our competitive advantage through data-driven decision-making, deeper customer insights, and allow for highly optimized and personalized content creation and improved ad spend efficiency in SEO and Marketing. Finally, AI can enhance regulatory compliance through more frequent internal audits of our assets.</p> <p>Negative Outcomes:</p> <p>The shift to AI presents several challenges, notably the high initial investment required for new AI infrastructure and talent. There is a risk of product commoditization if competitors quickly adopt similar AI tools, leading to increased competitive pressure, particularly from AI-first startups. In SEO and Marketing, existing strategies face disruption, creating dependence on third-party AI models and potentially increasing "AI-generated" noise online. From a reputation & trust perspective, the misuse of data, algorithmic bias, or lack of transparency could result in public backlash or significant regulatory fines.</p>

3.0 Non-financial statement

Legal and regulatory compliance, supply chain dependencies, technological advancements, seasonal impacts and increasingly demanding consumer expectations remain characteristic of the industry we work in. Over and above, specifically during the past year, the Group has also encountered the following two main challenges which have negatively impacted growth in 2025:

Organisational Growth – Following a remarkable 2024, which was defined by all-time highs across revenue, EBITDA, player intake and deposit value the business, while successfully completing the legal separation from Gaming Innovation Group and establishing Gentoo Media as a fully independent company, the period was also marked by the strongest pace in organisational growth as the Company expanded its workforce built out the support functions and corporate structures required to operate as a standalone business.

As Q1 2025 progressed, it became clear that previous business achievements and organisational growth had also created challenges in terms of long-term performance and profitable expansion. The business responded in Q2 with a strategic reassessment of priorities across the organisation through a comprehensive review of its cost structure, project pipeline and service portfolio. This review led to a reduction in operational costs, with a focus on improving operational efficiency in the core areas of the business where long-term value creation remains strongest. Specifically, the business

restructured its cost base through the reduction in personnel costs, optimisation of marketing spend in low-performing markets and improved vendor contract efficiency. In parallel, the business also streamlined operations towards a more market-driven model, enhanced cross-division collaboration and sharpened focus on high-performing assets within our website portfolio.

Having responded with agility in the face of adversity proved critical in maintaining business continuity. These attributes enabled the company to adapt quickly and, ultimately, recalibrate as it laid the groundwork for future resilience. Q2 may well be viewed as a transitional quarter whereby addressing structural inefficiencies has enabled the Company to be better positioned to continue pursuing its strategic objectives with renewed clarity and purpose.

Brazilian market – Regulatory developments and volatility in Brazil created short-term disruption in Q1 2025, with a more pronounced impact than initially anticipated:

- / Regulatory changes led to a sharp drop in active players due to new reactivation requirements;
- / Some operators exited the market while others paused operations during their license application process;
- / To gain market share, operators deployed increased player activation cost, affecting earnings in Q1;
- / Deposit values dropped during the transition period, affecting recurring revenue share earnings;

Despite short-term volatility, signs of recovery emerged shortly after quarter-end where the business recorded the highest deposit values, margins and revenue in the Brazilian market since market regulation, with deposit levels and the long-term outlook for the Brazilian market continuing to be positive.

In alignment with this operational reset, the business has drafted a comprehensive forward-looking Sustainability Plan for 2025–2027. Developed with the collaboration and insights of departmental leaders across the organisation, the plan outlines a clear path toward sustainable growth and reflects a shared commitment to long-term sustainable business practices through responsible innovation, financial discipline, talent development and harmonisation across departmental processes, whilst also giving due importance to environmental and social governance.



4.0

Sustainability Action Plan 2025 – 2027

Five sustainability pillars were identified with the intent of structuring the Group’s sustainability agenda, going forward, across all business units in-line with the below:

- / Environmental
- / Social (relating to employees and end-consumers)
- / Business Integrity and Responsible Business Practices
- / Anti-Bribery and Corruption
- / Governance Matters

A total of 43 projects have been identified, with some ongoing while others have completion dates spread across 2025 to 2027 as shown in Table 1. All 43 projects are split across the six sustainability pillars as indicated in Table 2.

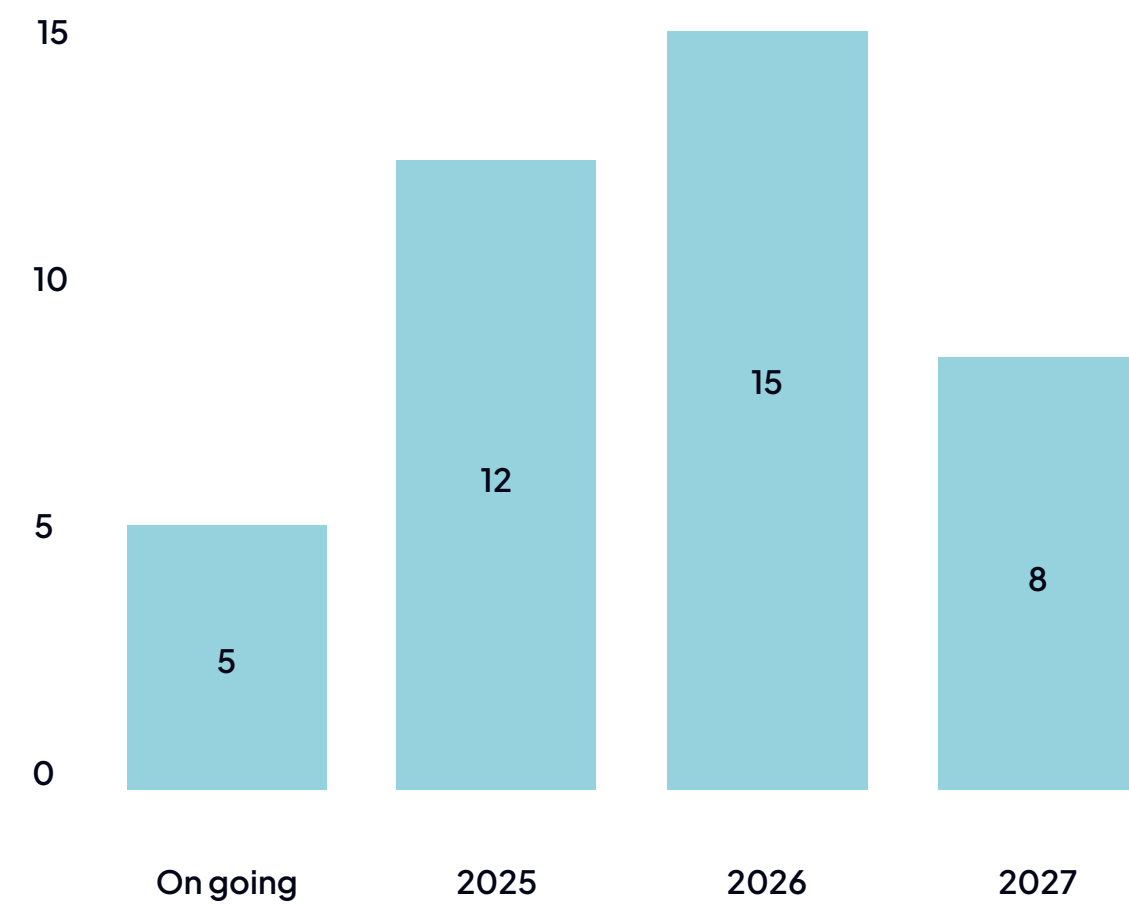


Table 1
Number of ongoing projects as well as the spread of the remaining projects spread across 2025, 2026 and 2027.

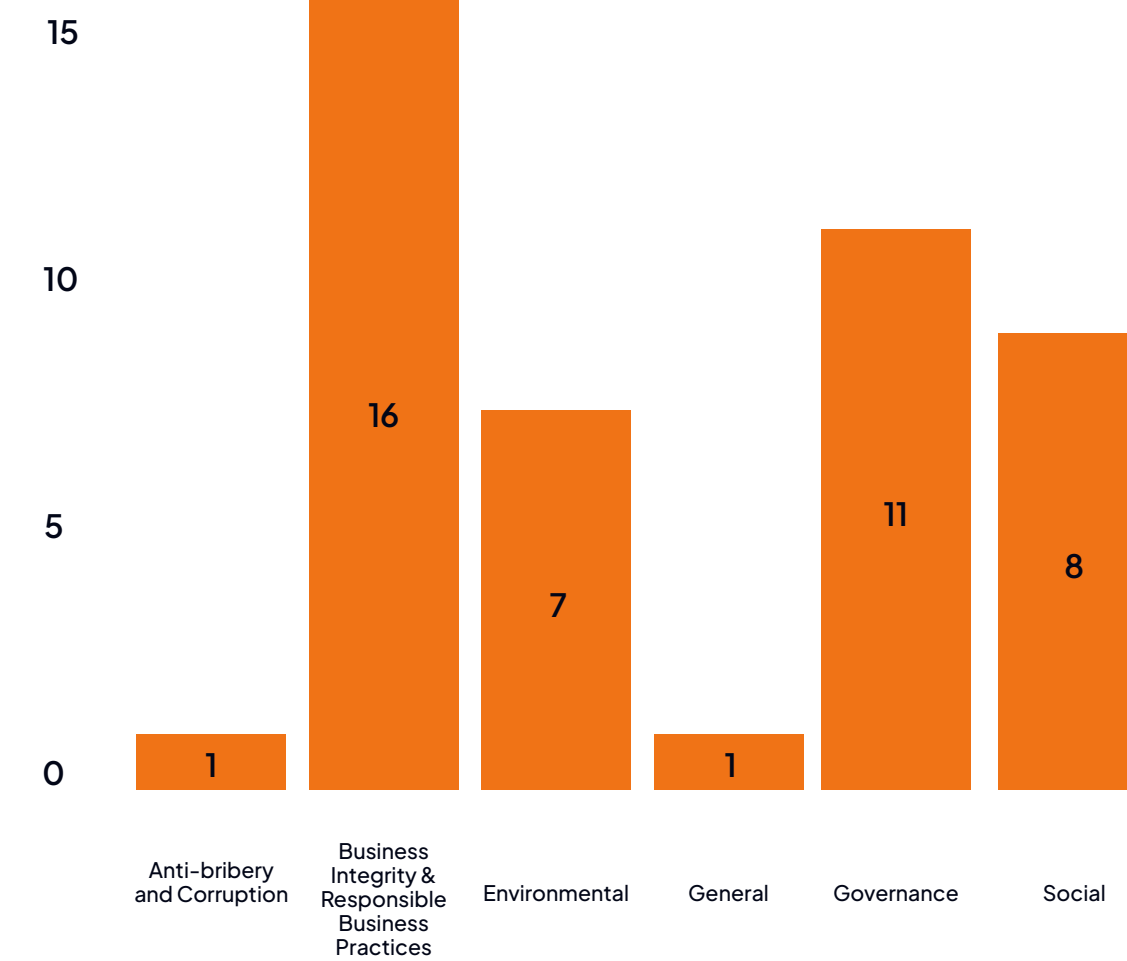


Table 2
Number of sustainability projects in the pipeline split across six sustainability pillars and spread across 2025 to 2027.

5.0 Environmental matters

In 2025, the business has materially completed the following projects:

Sustainability Pillar	Project
Environmental	<p>Carbon Accounting & Account set-up</p> <p>Set-up of Gentoo's carbon accounting account with Greenly.</p>
Social	<p>Team Building Budget</p> <p>Allocation of a team budget aimed at fostering stronger team bonds, especially in hybrid and remote setups.</p> <p>EU Pay Transparency Directive</p> <p>Work on ensuring compliance with the EU Pay Transparency Directive is proceeding as planned, focusing on creating a structured job architecture and compensation framework across all EU locations. Key current activities include completing job evaluation and leveling for consistency, defining internal salary bands using external benchmarks, and conducting a thorough pay gap analysis to address discrepancies - all remaining on schedule for final implementation and communication ahead of the 1 June 2026 deadline.</p>
Business Integrity and Responsible Business Practices	<p>Development of a Compliance internal knowledge-sharing platform</p> <p>The establishment of a channel and a process which supports the dissemination of compliance-related content across the Company in a structured approach, ensuring timely and up-to-date internal knowledge-sharing across the company.</p> <p>Regulatory Tech Product Improvement (Sitebee)</p> <p>Improvement of Sitebee's functionalities for a better service offering and internal implementation for asset auditing.</p>
Anti-bribery and Corruption	<p>Whistleblowing Management System</p> <p>Set-up of a whistleblowing management system that facilitates anonymous reporting of suspected or actual wrong-doings in-line with the EU's Whistleblower Protection Directive.</p>
Governance	<p>Group-wide Incident Register</p> <p>Establishment of a centralised Incident Register to capture, categorise and track operational incidents across the company. This register will support transparency, accountability and continuous improvement.</p> <p>Aligning with obligations set out in the Digital Services Act and AI Act</p> <p>Compliance with the Digital Services Act (DSA) and AI Act.</p>

5.0

Environmental Matters

5.1 Carbon Accounting

In 2025, Gentoo, now operating as a stand-alone business, committed to a comprehensive measurement of its greenhouse gas (GHG) emissions across **Scope 1, 2, and 3**, partnering with its external provider, **Greenly**, to conduct the assessment. This initiative required extensive data collection throughout the year to establish a robust baseline for the Group’s carbon footprint. The process involved gathering a wide range of essential data, including general company information, expense transactions, details of office buildings and employee data (in relation to emissions generated through commuting, meal choices and remote working), as well as key activity-based information most relevant to Gentoo’s operations, including, business travel, IT equipment inventories and cloud consumption metrics. This effort reflects Gentoo’s commitment to understanding and managing its environmental impact as part of its broader sustainability journey.

Scope 1, 2 and 3 GHG emissions for the year 2025 across Gentoo are as follows:

	Scope 1	Scope 2	Scope 3
Absolute tCP2e	12	199	8.5k
Employee tCO2e/employee	< 0.1	0.6	24
Revenue tCO2e/M€	0.1	2	86

5.1.1 Direct and Indirect Atmospheric Emissions

Scope 1 & 2: The amount of Scope 1 and 2 emissions is not high and does not significantly contribute to damage on safe planetary boundaries.

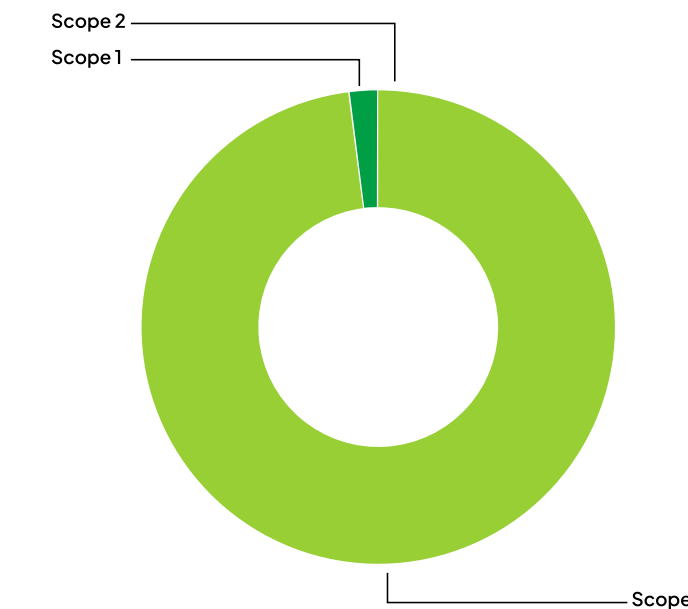
The generation of Scope 1 & 2 GHG emissions deriving from the Group’s own operations is mainly caused by purchased electricity. The only use of renewable energy sources is at the Malta office, where photovoltaic panels generate electricity which is distributed across 15 floors of the entire building, out of which Gentoo only occupies 2 floors, rendering the reliance on renewable energy insignificant. Thus, it is safe to conclude that all Gentoo offices consume energy generated from non-regenerative sources.

Scope 3: In terms of its upstream and downstream value chain, Gentoo has no visibility into the energy consumption methods used by its suppliers and customers.

Gentoo’s supply chain is widespread across several countries, involving multi-national service providers (such as Google) with a high energy footprint. The impact from our upstream value chain can be mitigated in the future through supplier engagement plans and codes of conduct that highlight the need of certified suppliers with less energy-intensive datacentres.

Upstream activities that generate Scope 3 GHG emissions include:

/ Sourcing and delivery of IT equipment to the workforce: local suppliers are sourced at each respective office location which deliver equipment to individuals that are office-based by land and to remote workers using a



combination of land/air/sea modes of transportation;
 / Delivery of employee lunches to all offices by local suppliers by land on a daily basis;
 / Delivery of drinking water to all offices by local suppliers by land on a weekly basis and
 / Ad-hoc local and international courier services utilising land transportation and a combination of different modes of transportation, respectively.

Due to the currently limited amount of data available from our value chain activities, the Scope 3 GHG emissions results may not be very accurate, although it is expected that the impact of our upstream value chain activities on the planetary boundary of climate change to be medium as the supply chain varies across several geographies causing emissions from various transportation modes. In this regard, remediability of these emissions is very difficult and requires extensive value chain engagement activities.

Downstream activities generating Scope 3 GHG emissions are limited to air travel to other Gentoo offices, conferences, events and client offices, since all Gentoo services are provided online.

5.0 Environmental Matters

5.1.2 Environmental Impact from Energy Use

The business has a negative impact on climate change due to the energy consumption from non-regenerative resources within Gentoo's own operations (that is, purchased electricity). However, the amount of energy use (and its contribution to climate change) is counteracted by the fact that the location of occurrence is concentrated to our physical office locations so the impact is not widespread across a significant area which would otherwise contribute to a larger, negative impact on the environment.

With regards to our downstream value chain, all activities are carried out from Gentoo offices, all of which mainly rely on purchased electricity to power operations. We are aware that positive impacts to the environment can be made through improvements to our entire value chain, despite generating a relatively low amount of atmospheric emissions.

Although building limitations are imposed through office lease agreements (which apply to all our offices), Gentoo remains committed to preserve the environment and community at large, through improvements that can be executed and are within its control, including:

- /Waste management
- /Decrease in single-use plastics
- /Reduction in unnecessary travel

5.1.3 Improvement Plan

Gentoo Media is committed to a multi-year decarbonization strategy. Given that Scope 3 emissions constitute 98% of our 8.7k tCO₂e footprint, our strategy focuses on three core pillars:

/ Refining Measurement and Setting Targets: We will improve data accuracy by prioritizing physical data collection to better quantify reduction potential and establish measurable GHG targets for 2026 and beyond.

/ Targeting Supply Chain & Digital Emissions: We will focus efforts on our largest sources - Services purchases (43%), Digital activities (19%). This includes implementing a sustainable procurement strategy to engage suppliers on utilizing less energy-intensive datacenters, and integrating sustainability criteria into IT asset procurement.

/ Optimizing Internal Operations: We plan to reduce unnecessary travel, particularly air travel (55% of Travel and Commute emissions), and improve office waste management/single-use plastic reduction. To support internal action, employees will be engaged through interactive Greenly training quizzes. We will also continue carbon contribution efforts, following our previous initiative of planting 1,955 trees to offset 199.12 tCO₂.



6.0

Social and Employee Matters

6.1 Social Matters

AskGamblers Charity Night

This night is dedicated to giving back to those in need and it has become a sought-after yearly tradition. The highlight of this evening is an auction featuring the top placements on our website (www.askgamblers.com). All proceeds from the auction are donated to charity, supporting various causes around the world.

During the month of September, we showcase and highlight the casinos that won auction spots on our site to ensure that the charitable donations made by the participating casinos are celebrated and recognised.

Each year, we select a specific charity or organisation to receive the funds raised from the auction. The amount raised and the cause it supports vary each year, but the goal remains the same: to make a positive impact. Here's a breakdown of some of the incredible initiatives we have supported:

/ 2025: The record sum of €135,000 was raised during the charity night. €108,870 have been donated to Foundation NORBS Plus, an organization that supports patients, families and healthcare institutions through the provision of medical devices and equipment, whereas, €26,130 have been donated to MS Platform Serbia to support people with multiple sclerosis with digital skills and psychological support, promoting social inclusion.

/ 2024: The sum €106,500 was donated to HISBAS (Hydrocephalus and Spina Bifida Association of Serbia) to aid in their ongoing efforts to improve the lives of children affected by hydrocephalus and spina bifida in Serbia. **/ 2023:** A total of €75,000 was raised, with €40,000 going to the Danish Refugee Council for their initiatives to enhance child-friendly spaces in Tanzania's Nduta and Nyarugusu refugee camps. The remaining €35,000 was donated to UNICEF to help strengthen core resources for children in Serbia.

Through these charitable initiatives, AskGamblers continues to use its platform to bring about meaningful change, and we are grateful to the casinos and individuals who contribute to making these donations possible. Each year, we are proud to see the impact of our efforts and to know that the funds raised are helping those who need it most.

6.2 Employee Matters

The strategic operational reset and comprehensive cost structure review undertaken in Q2 2025 led to a leaner, more resilient organization focused on long-term value creation. This foundational success is entirely driven by our people, and as Gentoo Media continues to pursue its strategic objectives, fostering a strong and inclusive culture remains paramount.

Workforce Diversity, Equity and Inclusion

At Gentoo Media, our success is driven by the expertise and dedication of our people. Whether in content creation, marketing, analytics or tech, every team member plays a vital role in pushing our business forward and keeping us at the forefront of the iGaming affiliate space. By the end of 2025, Gentoo Media had 340 full-time employees with 47 nationalities and an impressive gender representation of 51.8 % female, 47.9 % male and 0.03 % non-binary).

Going forward, we acknowledge and respect that individuals may identify with different genders. In this respect, we are committed to fostering an inclusive environment where all employees throughout their entire employment with us (starting as early as the pre-boarding process) have the opportunity to actively choose "non-binary or other" if they do not identify as male or female.

We aim to raise more awareness around this matter and, therefore, as part of our 2026 goals, we intend to explore opportunities around displaying employees' preferred pronouns alongside their names in our internal communication channel.

Preparation for the EU Pay Transparency Act

In 2025, one of our biggest projects will be to take active steps to align with the EU Pay Transparency Directive, which will come into effect in June 2026. As part of this, we have evaluated all positions across all our entities,

defined clear roles and responsibilities against clear and objective criteria, outlined required seniority levels and corresponding pay structures, and aligned accordingly. This supports fair and transparent pay structures in line with the EU Pay Transparency Directive, helping to eliminate unjustified pay gaps and ensure equal pay for equal work. We will also improve how we track and analyse pay equity, create transparency with employees and managers about pay structures and make sure our policies meet legal requirements ahead of the deadline in June 2026. This will build a more structured and fair compensation system that recognises and rewards every employee equitably. It will help us identify and close any potential pay gaps, reinforcing our commitment to fairness and transparency in salaries.

Team Building

At Gentoo, we recognize that our people are at the heart of everything we do. Team building activities play a crucial role in strengthening collaboration, improving communication, and fostering a positive work environment. These initiatives help build trust, boost morale, and create a stronger sense of connection within our teams - essential elements for achieving both individual and collective success.

In today's flexible working landscape, where teams may be spread across multiple locations or working remotely, intentional team bonding has become more

6.0 Social and employee matters

important than ever. Without regular in-person interaction, motivation and commitment can gradually decline.

Thoughtfully designed team building sessions provide opportunities for colleagues to connect on a personal level, share experiences, and maintain a unified sense of purpose — regardless of where they work.

Equally important is ensuring that our team building activities reflect the diversity of our workforce. Activities should be inclusive and considerate of different working styles, time zones, locations, and accessibility needs. This ensures that every team member feels valued, engaged, and able to participate meaningfully.

To support this, Gentoo has offered a team building budget per person, renewed every quarter, empowering teams to plan and participate in activities that strengthen collaboration, encourage creativity, and reinforce our shared values.

Together, these efforts help us build stronger connections, sustain motivation, and nurture a culture of teamwork across the entire organization.

Employee Training and Development

L&D Specialist, Udemy for Business, MadeYou

Our online training & development platform provides several courses available to all employees, covering professional development, skill-building courses

and industry-specific courses. Employees are also encouraged to use their annual conference budget to attend conferences and any other courses not available on the Group's platform.

The Group also enforces mandatory courses to employees in leadership positions, to equip them with the necessary skills, knowledge and feedback to effectively lead, support employee development, and drive team performance. In 2025, 36 leaders completed leadership training to build the skills they need to support and guide their teams.

In 2025, our People team focused on improving our approach to training and development through a more structured, data-driven, long-term solution by implementing a training system that allows us to track employees' learning, assign development aligned with career growth and pathways, and ensure that essential regulatory compliance training is part of our onboarding program. We will continue with the same approach, ensuring we equip our people with the right skills at the right time, supporting both their personal development and the Group's continued success.

Employee Wellbeing

As a Group, we take a holistic approach to employee wellbeing, understanding that everyone's needs are different. Every employee is provided with a wellbeing

budget, commensurate with inflation rates and which is renewed on an annual basis, with the aim of providing employees the opportunity and flexibility to invest in what personally contributes to their health and happiness. We also provide health insurance to all employees covering physical and mental health, and dental coverage. While we feel that we already offer a strong benefits framework, we continue to explore ways to enhance it and ensure a consistent standard across all our locations.

Working Conditions

We uphold fair and ethical working conditions and have clear procedures in place to address any concerns related to workplace rights, privacy and health and safety. Every employee has a dedicated People Partner to whom they can always raise concerns or issues in confidence. Besides this, in 2025 we rolled out our new whistleblower management system (further information is provided in Section 9). Our ongoing commitment to fostering an environment where employees feel supported, valued and empowered to do their best work is also shown through our Diversity, Equity, and Inclusion, Grievance, and Harassment and Bullying policies to ensure a fair and supportive workplace where everyone feels valued and heard and safe to raise their voice.

Offsetting emissions and reforesting the world with TreeNation

All new joiners get a welcome gift from the company to

reward participation in sustainability events, this being the planting of trees in TreeNation projects. In 2025, Gentoo Media alone planted 770 trees in the #GentooForest offsetting 53.65 tCO₂.

Company volunteer days

As part of our commitment to giving back, every employee in the Group has the opportunity to dedicate one workday to making a meaningful impact, whether that's supporting a cause close to their heart, contributing to society, or helping the local community. We want to increase awareness of this initiative so more of our people take advantage of their volunteer day. In 2025, 24 employees used their day for a variety of causes, including volunteering at animal shelters, hiking in aid of missionaries, donating blood, and environmental clean-ups. Our goal for 2026 is to increase that number by actively promoting the program throughout the year and making it easier for employees to get involved.

6.0 Social and employee matters

6.3 Key Performance Indicators

KPI	Description	Target	Actual (for 2025)	Comments
Diversity in Management	Percentage of men and women in management positions	50/50	61% male and 39% female	In 2025, management gender distribution improved in female representation compared to 2024. The company continues to monitor this as part of its diversity efforts and aims to further improve gender balance.
Training (e.g. course uptake/ participation rates through Udemy etc)	Percentage and number of employees participating in training courses (e.g. Udemy, leadership training..) to support continuous learning and development	Increase and retain employee participation in learning and development initiatives year-on-year	227 employees participated in Udemy courses during 2025 and 36 employees participated in Leadership training	In 2025, employees engagement in learning and development is demonstrating strong participation across the organisation. The initiative continues to support both professional growth and skill development, contributing to a culture of continuous learning. Focus for the coming year will be on maintaining high engagement levels, encouraging course completion, and further aligning learning opportunities with business and individual development goals
Offsetting emissions with tree planting	Number of total trees planted with offsetting emission captured	We will retain our reforestation commitment at current levels while exploring opportunities to scale our impact in key regions over time	770 trees planted offsetting 53.65 tCO2.	In 2025, we achieved a total of 0.64 hectares reforested, with the majority of efforts distributed across Tanzania (61%), the United States (8%), and Kenya (8%). We look forward to continuing to extend our welcome gift to new joiners in regions where it is most needed in the future.
Usage of Volunteer Days	Percentage and number of employees utilising company volunteer days to support community initiatives	Increase participation year-on-year (target: 50%)	24 employees utilised their volunteer day in 2025, participating in initiatives such as hiking in aid of missionaries, animal shelters, blood donation, and environmental clean-ups	The programme continues to provide valuable opportunities for employee engagement and community impact. Focus for the coming year will be on increasing awareness, simplifying participation, and encouraging wider uptake across the organisation.

6.4 Risks and Risks Management

Principal Risk	Description	Potential Impact	Key Controls & Mitigations	Comments
Diversity, Equity & Inclusion (DEI) development opportunities	A lack of diversity and inclusive culture can lead to discrimination, reputational damage, and disengagement with our people.	A lack of diversity and inclusion can weaken collaboration, hinder innovation, and damage the Group's reputation, potentially leading to lost investor confidence and legal exposure.	Diversity targets in promotions and policies for internal promotions. Regular unconscious bias training and DEI programs for management.	N/A
Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value.	Discriminatory pay practices can have a severe reputational damage to the operations of the Group, especially if they are seen to favour one gender over another.	We are aware there might be a risk and how this can impact our people; we have begun the assessment in accordance with the EU Pay Transparency Directive, which comes into effect in June 2026, to identify and address any potential pay gaps.	N/A
Workplace culture and employee engagement	Poor workplace culture and lack of communication leading to high turnover and disengagement.	Reduced productivity and employee retention.	Regular engagement surveys. Transparent communication having Group-wide "all hands" and implementation of an intranet. Ensuring employees feel connected to company values by involving them in defining who we are and what we stand for making our people feel a sense of belonging.	N/A

7.0

Business Integrity & Responsible Business Practices

Gentoo recognises the importance of adopting and applying effective measures for responsible business practices to remain attractive and competitive.

Operating in multiple jurisdictions means navigating a complex landscape of varying regulations. Gentoo is committed to understanding and adhering to the specific requirements of each market it operates in, and therefore, is also committed to promoting compliant and responsible business practices as mandated by gaming authorities and promoted by standard-setting bodies.

This includes regulatory compliance, consumer protection and responsible gambling, GDPR compliance, respect for intellectual property rights, vetting of employees and third-party risk management. By tailoring our approach to the unique demands of each jurisdiction, we uphold our commitment to regulatory compliance on a global scale. This dedication is central to the Group's mission of adhering to applicable legislation, codes of best practice and to fostering a safe and responsible gambling environment for players while also safeguarding minors and vulnerable individuals.

Ensuring the highest standards of responsible business practices translates into the adoption, application and monitoring of policies and improvement thereof through

self-assessment and the evaluation of new and innovative solutions.

Here's how we have shown continued commitment to responsible business practices in 2025:

7.1 Responsible Marketing and Advertising Compliance

Gentoo Media recognises that responsible marketing practices are fundamental to maintaining trust with regulators, partners, end users and other stakeholders.

To support this commitment, Gentoo maintains internal compliance procedures and training programmes designed to promote adherence to applicable advertising requirements and responsible marketing standards across the jurisdictions in which we operate.

In addition, Gentoo Media operates Sitebee, a proprietary marketing compliance platform designed to assist both internal teams and external partners in monitoring and improving compliance with advertising requirements. Through automated checks and enhanced oversight capabilities, Sitebee supports the identification and remediation of potential compliance issues across digital marketing assets.

We also work closely with our operator partners to align expectations regarding advertising standards and continuously evaluate our practices in light of evolving regulatory requirements and industry best practices. By embedding compliance considerations into our marketing operations, we aim to support a safer and more sustainable online gambling ecosystem while protecting the long-term integrity and resilience of our business.

7.2 Legal & Regulatory Compliance

In 2025, human resources were added to the Compliance team with clear segregation of duties. From a regulatory aspect, our strategy was to start addressing the risks pertaining to regulatory compliance as highlighted in the Sustainability Report for FY 2024, these mainly being:

- / Missed regulatory updates & mis-identification of applicable regulatory changes;
- / Lack of company-wide awareness of Gentoo's regulatory requirements;
- / Third-party Risk (refer to Section 10.1.1)

In response, one of the key risk mitigation measures was the implementation of a Compliance Program, as detailed below.

7.2.1 Compliance Monitoring Program

Jurisdiction Risk Assessment

This initial step to our Compliance Program was identifying and assessing reputational, operational and financial risk pertinent to our current and new target markets, should any non-compliance occur during the course of business operations through which the feasibility of operating in a particular jurisdiction is assessed.

The jurisdiction risk assessment includes an evaluation of a market's regulatory status and applicable laws and regulations, and the review of enforcement levels from relevant authorities, where an inherent risk level is assigned to each market on the basis of the potential likelihood and impact of a risk materialising. Eventually, we plan on developing our jurisdiction risk assessment further through the inclusion and consideration of internal controls for the calculation of residual risk.

This risk assessment is a dynamic document and is kept updated in-line with regulatory changes and business operations.

Compliance Help Desk

In 2025, a digital help-desk has been configured to act as an interface between internal employees and the Compliance team. The goal was to create an efficient,

7.0 Business Integrity & Responsible Business Practices

centralized platform for employees to submit inquiries and track responses, ensuring improved communication, faster resolution of issues and better record-keeping.

This help-desk has streamlined communication between employees and the Compliance team, and has contributed to a reduction of time spent on resolving queries, enhanced compliance awareness across the organization and ensured accurate record-keeping for future reference or audits.

Periodic Cross-Departmental Meetings

Compliance is a collective effort that requires collaboration across all departments. Over the past year, we established monthly meetings between the Compliance team and the Publishing and Paid verticals with the aim of discussing upcoming projects and proactively address queries and potential non-compliance issues. As an example, discussions revolve around content and promotional material, new campaign ideas and risk evaluation of new markets and verticals.

This collaborative approach ensures a cohesive and comprehensive strategy where compliance matters are taken into account in commercial decision-making.

Development of Advertising Regulations

Clear, well-documented advertising regulations define

standard advertising rules across different markets in addition to regulatory requirements for different verticals (Publishing and Paid Media) and markets we operate in. Adherence to these guidelines serve as a basis to the reduction of non-conformities flagged internally during audits as well as externally by clients and gambling authorities, thus contributing to a decreased risk of non-compliance, potential financial penalties and reputational damage.

These are regularly reviewed and updated to remain aligned with evolving regulatory requirements.

Development of an Internal Compliance Knowledge-Sharing Platform

Confluence has been used for setting-up a comprehensive central repository for all compliance-related materials across Gentoo. Essential compliance resources found on Confluence include department-specific policies, up-to-date regulatory information presented through monthly reports and legal memos, and tailored advertising guidelines for various markets. The page also documents the use and management of digital tools utilized by the compliance team, outlines third-party risk management protocols, and provides resources related to the internal auditing of Gentoo's digital assets.

Its objective is to establish a structured channel and

process for Group-wide access to compliance-related content, to support the dissemination of compliance-related content across the Group in a structured approach, ensuring internal knowledge-sharing across all departments.

This approach benefits Gentoo to foster a well-informed organization that proactively adapts to regulatory changes, reduces non-compliance risks, improves decision-making and strengthens market position through alignment with legal and industry standards.

Compliance Training Program

In 2025, we launched a compliance training program (the "program") across all business functions to enhance legal and regulatory compliance awareness across the Group. The training program has been structured in four components, these being, induction training at employee onboarding (with the intention of raising awareness of the legal and regulatory compliance function), general training applicable to all employees (with topics varying from general advertising standards, risk management to whistleblowing) and specialised department- and market-specific training with annual refresher training sessions.

The goal of having a structured compliance training program is not only to improve employees' understanding of regulatory requirements, but also to instill a compliance

mindset for approaching and executing their work with the ultimate aim of improving adherence to advertising rules and Group policies, minimising legal and regulatory risks and strengthen the Group's reputation with regulators and other external stakeholders.

Compliance Monitoring

Work has been initiated on structuring an internal audit plan for auditing Gentoo's websites and social media platforms. While auditing was previously carried out on request and/or whenever needed, a formal plan outlining asset prioritisation and audit frequency has been in the works during the past year.

In view of the importance of auditing itself as well as improving our audit plan and audit reports, we have kicked off our monitoring program on some of our top-revenue assets. Currently, work is being carried out manually, however, we are aware that manual auditing results in a slower process and, potentially, in missed non-conformities due to human error.

Our objective is to eventually leverage our proprietary software, Sitebee, for the automation of internal auditing of our digital assets. Work in this regard has also been initiated in 2025 where the Compliance team have identified improvements to Sitebee's functionality to increase its usability internally.

7.0 Business Integrity & Responsible Business Practices

Some of the functionalities that have been identified and have already been worked on include:

/ Increased crawl capacity through a second provider, capturing more non-conformities and a higher level of accuracy.

/ Improvement of image recognition, making the product more reliable and effective.

/ Product simplification, such as, through the creation of templates for audit checks, dashboards and instant reports contributing to a more efficient audit process.

With the proper level of product functionality and testing, the implementation of Sitebee for internal auditing of our digital assets - as well as a software-as-a-service to our clients - would potentially result in flagging (almost) all non-conformities thus reducing the likelihood of compliance incidents from materialising and the potential impact of stemming from such, including but not limited to, administrative penalties.

Compliance Culture Survey

Ultimately, to assess the effectiveness of our Compliance Program, we intend to roll-out a Group-wide survey to evaluate the compliance culture within the Group. Without survey data, the Compliance team will not be able to quantitatively assess the effectiveness of our internal controls and identify areas of improvement to attend to

employee needs including, but not limited to, additional training and resources.

7.2.2 GDPR Compliance and Data Privacy

Observing GDPR and data privacy is a fundamental part of our operations. We always request explicit consent from all users before sending any advertising material and ensure that their personal data is never shared with third parties without permission. Our commitment to GDPR compliance reflects our respect for our users' privacy and our dedication to maintaining their trust.

7.2.3 Intellectual Property

As content creators, we deeply respect the intellectual property rights of others. We always credit sources and seek permission when necessary before publishing editorial content. Gentoo's websites will never host illegal content or engage in unethical practices, such as file-sharing, directing users to pirated content sites, or any other forms of intellectual property infringement. Our Legal team has dedicated resources to provide guidance and advice on intellectual property management practices and, in addition to responding to ad-hoc related queries, it has organised a company-wide workshop by collaborating with an external consultant to provide training on relevant IP matters. It is the Group's intention to increase the level of training and development of its employees by organising similar workshops in the future.

7.2.4 Aligning with obligations set out in the DSA and AI Acts

Gentoo Media is proactively addressing the evolving digital governance landscape by aligning its practices with the core principles of the EU's Digital Services Act (DSA) and the forthcoming AI Act. This commitment is operationalized through continuous monitoring, leveraging internal audits and our compliance framework to ensure proactive governance over content moderation, digital advertising practices, and the ethical deployment of AI tools across our business.

7.2.5 Consumer Protection & Responsible Gambling

Truthful and transparent advertising: As an advertising company, we have a fundamental obligation and responsibility to ensure that our advertising is truthful, transparent and not misleading to our visitors. We strive to partner with responsible operators and make sure our content is not misleading or deceptive which could misinform potential players about the odds, deposit and wagering requirements, and potential rewards associated with a specific game or promotion. The most significant terms and conditions are always disclosed on our adverts and banners, as well as, a link leading to all terms and conditions associated with a specific game or promotion.

In this regard, reference is made to various advertising standards and codes of conduct, including those

issued by the Advertising Standards Authority (UK), the International Chamber of Commerce and the European Gaming and Betting Association, together with jurisdictional-specific marketing regulations published by gambling authorities in the various regulated markets we operate in. Adherence to these standards and regulations help protect consumers and maintain the integrity of the industry.

Awareness of responsible gambling is raised through:

/ Dedicated responsible gambling page: Each of our websites includes links to a dedicated Responsible Gambling page. This page provides comprehensive information and resources on responsible gambling, including tips for maintaining control, recognizing signs of problem gambling, and links to gambling addiction support organisations. We believe in providing our users with the tools and information they need to gamble responsibly.

/ Promotions and bonuses: When advertising promotions and bonuses, we take responsible gambling measures into account to ensure our marketing practices do not encourage irresponsible behavior. Our advertisements are crafted to provide clear and transparent information, emphasizing the fun and entertainment aspect of gambling rather than promoting it as a financial solution.

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We avoid any language or imagery that might instill a sense of urgency and those that may suggest gambling is a way to achieve financial success.

/Dissemination of responsible gambling messages: To continuously educate and remind our players about the importance of responsible gambling, we disseminate responsible gambling messages across all our advertising channels. Whether it's through our websites, social media pages, or emails, we ensure that our communications include reminders that gambling should be seen as a form of entertainment, not a financial means. Our messages are designed to encourage players to gamble responsibly and seek help if needed.

/Regard to Minors: We are particularly mindful of our responsibility to prevent gambling content from appealing to minors and individuals under 25 years old. Our marketing materials are carefully reviewed to ensure they do not feature themes, images, or language that might attract younger audiences. This is part of our commitment to creating a safe environment where only those who are legally allowed to gamble can access our content.

Additionally, to prevent access to minors, our social media channels are equipped with age-gating tools and our websites feature an age declaration, where required. These tools are part of our broader strategy to ensure that our gambling content is only accessible to those who are of legal gambling age and, in this regard, we continuously monitor and update our social media practices to align with the best standards in the industry and keep abreast of industry trends and innovative solutions.



7.0 Business Integrity & Responsible Business Practices

7.3 Risk and Risk Management

Principal Risk	Description	Potential Impact	Key Controls & Mitigations	Comments
Low Employee Engagement (Training)	Lack of employee motivation or interest in mandatory compliance training, often due to perceived irrelevance.	Low participation and completion rates, leading to a critical lack of awareness of essential compliance requirements across the organization.	Recruitment of L&D specialist - Use interactive training methods and real-world case studies to increase participation.	
Lack of Time for Training	Employees struggle to allocate time for non-essential or non-urgent training activities within their demanding daily operational responsibilities.	Delays in the adoption of essential compliance and skill-building knowledge, postponing the mitigation of critical regulatory risks.	Offer flexible training formats, including on-demand e-learning options.	
Outdated or Irrelevant Content	Training materials do not keep pace with the rapid changes in legal, regulatory, and business requirements across multiple jurisdictions.	Employees may apply incorrect or outdated compliance knowledge, significantly increasing the risk of non-compliance and reputational damage.	Regularly update training materials to align with regulatory changes and business needs.	
Difficulty in Tracking Completion Rates	The business lacks an efficient, automated system to monitor and verify which employees have completed mandatory training modules.	Inability to report accurately on compliance adherence, quantitatively assess training effectiveness, or identify critical knowledge gaps across the organization.	Utilize an LMS or automated tracking tools to monitor participation (EQS)	

8.0

Human rights matters

As a starting point, every employee at Gentoo Media has joined voluntarily and no one has been forced into employment. During our hiring process, we ensure that all candidates meet the legal working age requirements in every location where we operate. Our hiring process is structured and fair, and in this respect, all suitable candidates are treated equally and given the same opportunity for an initial interview.

At Gentoo Media, we are committed to upholding and protecting the rights of our employees and partners through clear policies and responsible practices. Our People team conducts an annual review of all policies to ensure they remain relevant, effective, and aligned with best practices, such as our Diversity, Equity and Inclusion Policy, Harassment & Bullying Policy and Grievance policy.

We prioritise Diversity, Equity, and Inclusion, Health and Well-being, the Right to Disconnect, and protections against Harassment and Bullying, Grievance procedures among others, to ensure a safe, inclusive, and ethical workplace. Across all our offices, we have safety measures in place (such as fire extinguishers, water sprinklers, smoke alarms) as well as designated officers also certified in first aid who would provide first-hand assistance if and when needed.

The above is our commitment to continuously improve our approach to human rights, ensuring that everyone who works with us is safe and treated with dignity and respect.



9.0

Anti-bribery and corruption

Our business and reputation are built upon fair, lawful, responsible and ethical conduct and, therefore, we are committed to continue working towards achieving the highest standards of ethical conduct and integrity across our operations on a day-to-day basis and in all dealings, both internally and externally, with colleagues, customers, suppliers and regulators.

Maintaining our reputation for business integrity and excellence requires careful observance of all applicable laws and regulations which also extends to having regard for the highest standards of personal integrity.

Our Code of Conduct sets out the standards that form the honest, ethical foundations for the way that Gentoo does and operates its business covering issues such as market operations, countering bribery, corruption, harassment and fraud. Compliance with our Code of Conduct is non-negotiable, and alongside this document, all stakeholders are expected to exercise good judgment, based on high ethical principles, for guidance as to what is acceptable conduct and what is not.

9.2 Whistleblower Protection

The prevention, detection and reporting of bribery and corruption is the responsibility and duty of all Group stakeholders, including employees, Board members and shareholders. It is mandatory for all new employees to attest to have read and understood the contents of

our Code of Conduct prior to their employment starting date and all employees are expected to report any wrongdoings throughout the course of their employment. In this respect, protection of all whistleblowers against retaliation is our top priority in order to ensure a safe environment where anyone is encouraged to report, while ultimately safeguarding the business from existing and potential wrongdoings and their adverse impacts, which help towards business longevity.

In-line with the EU's Whistleblower Protection Directive and national laws, in 2025 the Group has successfully rolled out a Whistleblowing Management System - a reporting channel that facilitates anonymous reporting of suspected or actual wrong-doings and, thereafter, anonymous dialogue between the whistleblower and our Whistleblowing Officer to share progress on the investigation and resolution.

Group-wide training has been provided on the system. Additionally, all employees have been asked to certify their understanding and adherence to our Whistleblowing Policy and assigned a mandatory course and assessment on the topic, to ensure understanding of the process and system.

Risks and risk management

Bribery and corruption pose significant risks to Gentoo, impacting legal, financial, operational, and reputational

aspects. Legal risks include potential fines, criminal prosecution, and civil liability, while reputational risks involve a loss of public trust and negative media coverage. Financial risks can arise from penalties, higher operational costs, and the loss of business opportunities. Operationally, corruption can lead to inefficiency, favoritism, and internal conflicts.

To manage these risks, Gentoo expects all its employees and Board of Directors to abide by its Code of Conduct, which explicitly highlights its zero-tolerance stance on bribery and corruption. In this regard, all new hires need to attest to having read Gentoo's Code of Conduct prior to their starting date. Additionally, Gentoo expects top management to lead by example and demonstrate a commitment to anti-corruption efforts, ensuring transparency in decision-making and independent oversight.

When it comes to bribery and corruption risks emanating from its partners, as specified earlier, Gentoo is also working on a robust vetting process as highlighted in Section 7. Internal controls, such as internal audits and the implementation of the four-eye principle in day-to-day operations help detect unethical practices prior to the risk materialising.

10.0

Governance

10.1 Governance, Risk & Compliance and Internal Audit Function

Building on the foundation established by the Board's dedicated ESG and Compliance Committee, Gentoo Media is finalizing a comprehensive Governance, Risk & Compliance (GRC) strategy for operational effectiveness and long-term integrity. This framework is being structured around an updated Business Risk Assessment (BRA), a formalized risk register, and a clear Risk Policy Hierarchy to ensure consistent and proactive governance across all business units. Key achievements in 2025 included the operationalization of our ethics through the rollout of a Group-wide Whistleblowing Management System and a centralized Incident Register in Q4 2025.

10.1.1 Third-Party Risk Management

Given the Group's reliance on external providers across its value chain - including marketing partners, search engines, and online gambling operators (customers) - robust Third-Party Risk Management (TPRM) is essential to safeguarding our business integrity and reputation. The key risk exposure for Gentoo Media stems from the potential for financial loss and reputational risk arising from customers, particularly those with complex corporate structures, operations in high-risk jurisdictions, or involvement of politically exposed persons (PEPs). To proactively mitigate this, Gentoo initiated the development of a comprehensive, robust vetting process for partners. Furthermore, our internal compliance framework, including

the new Compliance Knowledge-Sharing Platform, explicitly outlines third-party risk management protocols to ensure company-wide adherence to integrity and risk standards.

10.2 Incident Management

As part of our ongoing effort to build an effective GRC framework, we dedicated resources to build an incident management system. Central to this is an Incident Register, which serves as a centralised log where all operational incidents - ranging from compliance violations to IT security breaches - are recorded, categorised and tracked.

Within the GRC framework, the incident register enables structured incident response by facilitating timely reporting, communication, root cause analysis and prioritisation of resolution efforts based on a risk-based approach (in terms of likelihood of reoccurrence and impact), alongside transparency, accountability of stakeholders and continuous improvement of business processes and systems.

The incident register has been configured to support different roles and permissions, limiting access to certain incidents by unaffected employees, as well as, different security levels.

Ultimately, the incident register is essential to uncover recurring issues that may go unnoticed, systemic problems, for continuous monitoring, trend analysis and enhancing the organization's resilience by feeding lessons learned into future risk mitigation and governance strategies.

Thus, it transforms incident management from a reactive to a proactive discipline within GRC, helping ensure regulatory alignment and operational stability.

Once the Company's GRC framework and related policies are finalised, all reported incidents going forward will be mapped to the relevant GRC policies to ensure that incident management is governed appropriately by relevant policies, risks are mitigated and compliance requirements are met effectively within the Company's GRC framework.

10.3 Risk and Risk Management

Principal Risk	Description	Potential Impact	Key Controls & Mitigations
Third-Party Exposure	The Group's development, performance, and position is largely dependent on the integrity, performance, and relationships with all third parties (marketing partners, service providers, customers). The key risk exposure stems from financial loss, financial crime (ML/FT) and reputational risk arising from customers.	Financial loss (clients refusing to honour payment terms) and ML/FT risk derived from clients with complex structures, operations in high-risk jurisdictions, or involving PEPs/sanctioned individuals. These risks can have a detrimental effect on the Group's reputation.	Robust Third-Party Risk Management (TPRM) is essential. Gentoo initiated the development of a comprehensive, robust vetting process for partners. Internal compliance framework, including the Compliance Knowledge-Sharing Platform, explicitly outlines third-party risk management protocols.
Systemic Operational Issues (Incident Management)	The risk that recurring issues or systemic problems go unnoticed, hindering continuous improvement and organizational resilience.	Operational instability and reduced organizational resilience.	Rollout of a centralized Incident Register in Q4 2025 to record, categorize, and track all operational incidents. Resolution efforts are prioritized based on a risk-based approach, feeding lessons learned into future governance strategies.
Legal and Regulatory Compliance	The regulation of online gambling is extensive, varies worldwide, and is always subject to change. Risks include missed regulatory updates and lack of company-wide awareness of requirements.	Adverse impact on financial performance due to potential penalties and sanctions arising from non-compliance to new legislation (e.g., social responsibility obligations, advertising, and responsible gambling regulation).	Adoption of efficient and effective operational change management procedures. Planned, periodic monitoring of assets and enrollment of a company-wide compliance training program.
GRC Strategy/Framework Maturity	Failure to finalize and effectively implement the comprehensive Governance, Risk & Compliance (GRC) framework. The framework is being structured around an updated Business Risk Assessment (BRA), a formalized risk register, and a clear Risk Policy Hierarchy.	Inconsistent or reactive governance, failure to manage risk consistently across business units, and inability to ensure long-term integrity.	Finalizing the comprehensive GRC strategy. The Board's ESG and Compliance Committee and Audit Committee provides strategic oversight. Reported incidents will be mapped to the relevant GRC policies once finalized.

11.0

Concluding Remarks

The 2025 fiscal year was pivotal, marking Gentoo Media's successful transformation into a resilient, focused, and independent affiliate leader following our strategic separation. Our success was built on a dual foundation: internal operational excellence, demonstrated by the Q2 strategic reset to achieve a leaner structure, and the strengthening of our long-term sustainability commitment. We operationalized our ethics by establishing the ESG and Compliance Committee, rolling out a Group-wide Whistleblowing Management System and a centralized Incident Register in Q4 2025, and initiating the finalization of our comprehensive GRC strategy, structured around an updated Business Risk Assessment and a clear Risk Policy Hierarchy. Environmentally, we established a crucial baseline by completing our Scope 1, 2, and 3 GHG emissions measurement with Greenly and committed to a multi-year decarbonization plan, supported by our carbon contribution efforts. Socially, our people-first approach drove a record-breaking €135,000 raised for charity and a continued commitment to workforce diversity, inclusion, and preparation for the EU Pay Transparency Act ahead of the June 2026 deadline. Looking ahead, Gentoo Media is strategically positioned to achieve sustainable growth by embedding ESG principles into every facet of our commercial strategy, guided by our 43-project Sustainability Action Plan for 2025–2027.

