

Code of Conduct

PointsBet Holdings Limited
ACN 621 179 351

Adopted by the Board on 25
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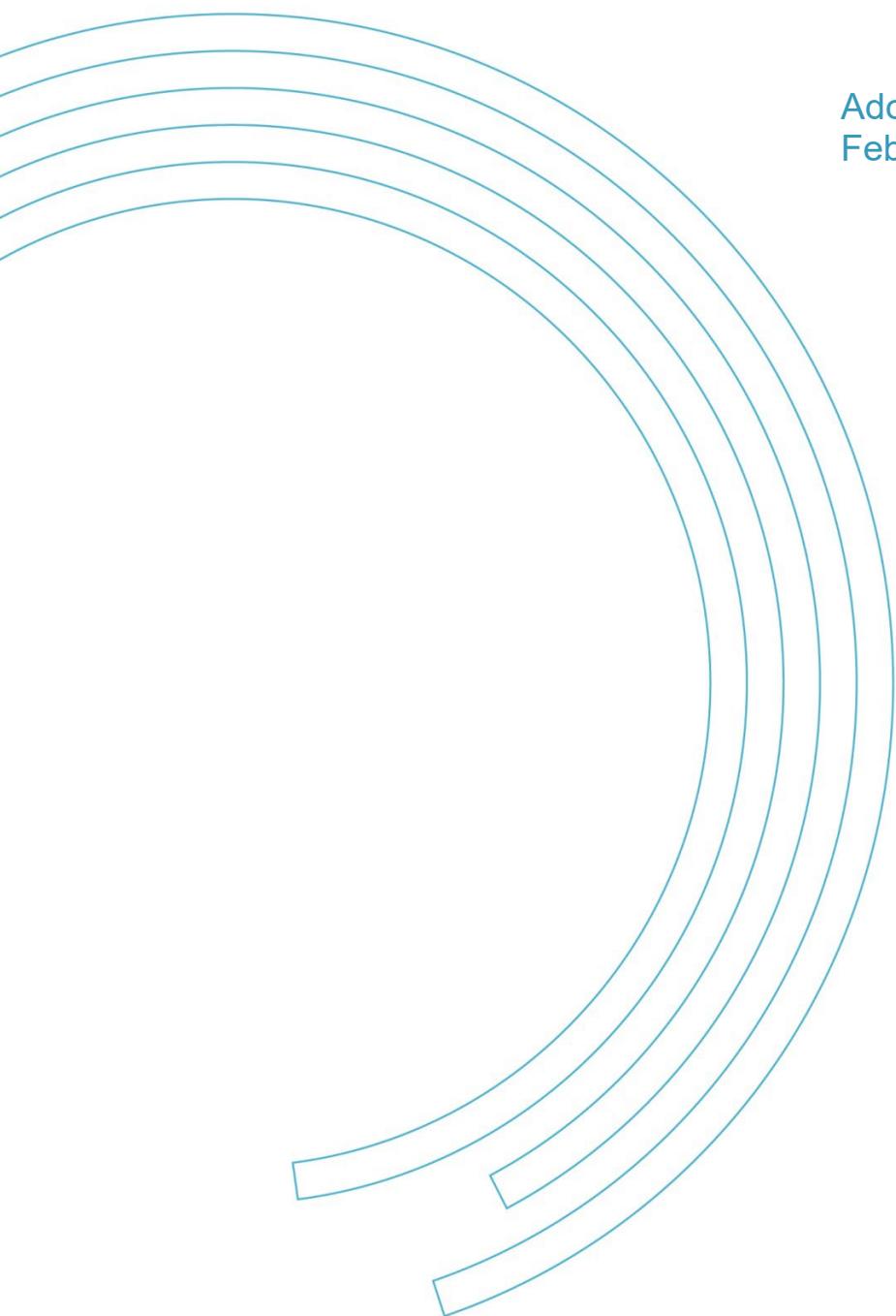




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Part A – Scope and application

1 Purpose of the Code

PointsBet Holdings Limited (the **Company**) is committed to a high level of integrity and ethical standards in all business practices. Employees must conduct themselves in a manner consistent with current community, ethical and Company standards and in compliance with all relevant legislation.

The objective of this Code of Conduct is to:

- (a) provide a benchmark for professional behaviour throughout the Company;
- (b) support the Company's business reputation and corporate image within the community; and
- (c) make Directors and employees aware of the consequences if they breach the policy.

The board of Directors of the Company (**Board**) has endorsed this code. The Board and management believe that the Company's commitment to this code will maintain the confidence of the Company's key stakeholders in the Company's integrity.

We regularly monitor and test our policies under this Code of Conduct to ensure our commitments remain relevant, effective and consistent with our stakeholders' expectations.

While the Code of Conduct is designed to ensure the Company delivers on its commitment to corporate responsibility and sustainable business practice, it does not create any rights in any employee, client, customer, supplier, competitor, shareholder or any other person or entity.

It takes more than talented people, cutting-edge technology and innovative products to meet our customer's expectations. The Company has adopted the following core values: Courage, Integrity, Commitment and Passion.

2 Who the Code of Conduct applies to

All employees must comply with the Code of Conduct. A reference to 'employees' includes temporary employees, contractors (whether individual contractors or employees of incorporated contractors engaged by the Company), Company Directors and officers, consultants and other persons that act on behalf of the Company or related bodies corporate or affiliates of the Company.

References to the Company in this Code of Conduct include references to the Company, its related bodies corporate and affiliates.

The Code of Conduct applies to all business activities with suppliers, contractors, customers, shareholders and employees in Australia and overseas.



Responsibility lies with every person covered by the Code of Conduct to conduct themselves in accordance with the Code of Conduct.

Some employees may also have additional responsibilities relating to the Code of Conduct (see below).

Position	Responsibility
Employee/Contractor	It is the employee's/contractor's responsibility to: <ul style="list-style-type: none">• comply with the Code of Conduct;• act at all times in the best interests of the Company, with strict integrity and according to legal and approved Company business practices; and• raise any concerns or issues with their manager.
Manager	It is a manager's responsibility to: <ul style="list-style-type: none">• communicate the Code of Conduct to employees and contractors;• take a leadership role in observing and promoting the behaviour and standards in the Code of Conduct and related policies; and• take immediate action where an employee reports a potential breach of the Code of Conduct, or where the manager observes a potential breach.
Company Secretary	It is the responsibility of the Company Secretary to: <ul style="list-style-type: none">• conduct preliminary investigations in relation to potential breaches of the Code of Conduct;• review and recommend updates of the Code of Conduct and related policies as required; and• conduct regular training on the Code of Conduct for employees.
Audit and Risk Committee	It is the responsibility of the Audit and Risk Committee to: <ul style="list-style-type: none">• review and discuss with management the overall adequacy and effectiveness of the Company's legal, regulatory and ethical compliance programs;• review the procedures the Company has in place to ensure compliance with laws and regulations (particularly those which have a



Position	Responsibility
	major potential impact on the Company); and <ul style="list-style-type: none">review the Company's policies and culture with respect to the establishment and observance of appropriate ethical standards (including the Code of Conduct).

3 How the Code interacts with other Company policies

The Code of Conduct should be read in conjunction with the following Company policies:

- (a) Continuous Disclosure Policy;
- (b) Securities Dealing Policy; and
- (c) Diversity Policy.

Copies of these policies are available on the Company's website.

The Company continually assesses and upgrades its policies and procedures to ensure compliance with corporate governance requirements. You will be notified of any material changes to the policies and procedures.

4 What to do if you suspect the Code has been breached

4.1 Reporting channels

You are encouraged to report to your manager any genuine behaviour or situation that you believe breaches or potentially breaches the Code of Conduct, Company policies or the law.

Alternatively, you can report unacceptable behaviour through any of the following channels:

- (a) Company Secretary;
- (b) Director;
- (c) Chief Executive Officer; or
- (d) for operations outside Australia, the HR Manager in your country.

4.2 Whistleblower protection

The Company is committed to ensuring that you can raise concerns in good faith regarding unlawful, unethical or otherwise unacceptable conduct without fear of victimisation, harassment or discriminatory treatment.



You are encouraged to report instances of actual or suspected fraudulent or unethical behaviour including any breach of the Company's codes and policies to the Company Secretary/ HR Manager.

Wherever possible, your calls, notes, emails and other communications will be dealt with confidentially. You have the Company's commitment that, whenever possible, your privacy will be protected where you make a report under the Code of Conduct.

It is a breach of the Code of Conduct for any employee to cause disadvantage to or discriminate against an employee who makes a report under the Code of Conduct ('whistleblower'). Examples of disadvantage and discrimination include:

- (a) reprisals, harassment or victimisation;
- (b) demotion, dismissal or loss of opportunity for promotion; and
- (c) current or future bias.

The protection that the Company will make available to protect whistleblowers will vary depending on the circumstances, but may include:

- (a) ensuring confidentiality in the investigation and protecting the whistleblower's identity;
- (b) monitoring and managing the behaviour of other employees;
- (c) offering a leave of absence while a matter is investigated;
- (d) relocating employees (which may, but will not necessarily, include the whistleblower) to a different working group or department; and
- (e) rectifying any detriment a whistleblower has suffered.

4.3 Investigations

Preliminary investigations of reported breaches are administered by the Company Secretary/HR Manager.

If a breach of the Code of Conduct is found to have occurred, a formal investigation process will be administered by the Company Secretary/HR Manager. in consultation with the supervisor or manager of the offending person.

In the investigation process, all employees are expected to cooperate with the directions of the Company Secretary/HR Manager. [HR Manager / Company Secretary].

5 Consequences of breaching the Code

The highest standards of corporate conduct are critical to the Company's success and reputation.

The Company recognises that breaches of the Code of Conduct may occur from time to time. We expect that any breach will be inadvertent and without intent, however it should be clearly understood that any breach may result in disciplinary action or other penalties.



Depending on the nature of the breach, these penalties may range from counselling to dismissal or termination of the contract or engagement (in extreme circumstances). The Company will act objectively and in accordance with any applicable provisions or requirements in an employment contract.

The Company reserves the right to inform the appropriate authorities where it is considered that there has been criminal activity or an apparent breach of the law.

6 Promoting and publishing the Code

The Company and its management will promote the Code of Conduct across the organisation and provide training on the topics it covers.

A copy or summary of the Code of Conduct will be available on the Company's website. It will be distributed to all employees and other persons as relevant.

7 Who to speak to if you have questions

The Code of Conduct does not include:

- (a) every ethical issue that an employee might face; nor
- (b) every law and policy that applies to the Company.

In representing the Company you are expected to act in a manner consistent with the key values underpinning the Code of Conduct, namely:

- (c) our actions must be governed by the highest standards of integrity and fairness;
- (d) our decisions must be made in accordance with the spirit and letter of the applicable law; and
- (e) our business must be conducted honestly and ethically, with our best skills and judgment, and for the benefit of customers, employees, shareholders and the Company alike.

If you have any questions regarding the Code of Conduct or any of the Company's policies at any time, you should contact the Company Secretary/HR Manager



Part B – Your obligations

1 General

You are expected at all times to act consistently with the values, commitments and ethical standards as set out in this Code of Conduct.

2 Compliance with laws and regulations

You should be aware of, and comply with, your duties and obligations under all laws and regulations relating to your work.

We encourage you to:

- (a) actively understand the laws which affect or relate to the Company's operations both in Australia and overseas;
- (b) attend seminars presented by the Company or other external service providers to maintain your knowledge of the laws and regulations, as well as to increase your awareness of relevant legal and industry developments; and
- (c) interpret the law in a way which reinforces the Company's reputation for integrity.

All actual or potential breaches of laws must be immediately reported to the Company Secretary/HR Manager. You will be held personally accountable if you break the law while working for the Company (or otherwise).

Mere lawfulness may not always be a sufficient assessment to meet the Company's commitment to integrity. You should also comply with the technical and ethical requirements of relevant regulatory or professional bodies (unless there is an appropriate reason not to).

Where local laws or regulations differ from this Code of Conduct, you must apply this Code of Conduct or local requirements, whichever sets the higher standard of behaviour.

Ignorance of a particular law does not excuse your obligation to comply with appropriate legal obligations. If you have a question as to whether particular laws apply or how they may be interpreted, please contact the Company Secretary/HR Manager.

3 Fair trading and dealing

The Company aims to maintain a high standard of ethical behaviour in conducting business and to behave with integrity in all dealings with customers, shareholders, government, employees, suppliers and the community.

When dealing with others, you must:

- (a) perform your duties in a professional manner;



- (b) act with the utmost integrity and objectivity; and
- (c) strive at all times to enhance the Company's reputation and performance.

You are encouraged to familiarise yourself with the legal requirements applying to fair trading and dealing, and to undertake training or attend seminars to develop and maintain your knowledge so that you can act in accordance with those requirements.

If you have a question or wish to report a breach of fair dealing requirements, please contact the Company Secretary/HR Manager.

4 Conflicts of interest

Conflicts of interest should be avoided and if they occur, should be disclosed to the Company Secretary/HR Manager, a Director or the Chief Executive Officer (CEO).

You are responsible for notifying the Company of any conflicts of interest (actual or potential). If you are concerned that you may have a conflict of interest you should disclose that interest and discuss the matter with the Company Secretary/HR Manager as soon as possible.

4.1 What is a conflict of interest?

A conflict of interest exists where loyalties are divided.

You may have a conflict of interest if, in the course of your employment or engagement with the Company:

- (a) any of your decisions lead to an improper gain or benefit to you or your associate; or
- (b) your personal interests, the interests of an associate or relative, or your obligation to some other person or entity conflict with your obligation to the Company.

You must not allow your personal interests or the interests of family or friends to conflict with the interests of the Company. You must avoid participating in decisions and activities which may conflict, or be perceived to conflict, with your duties and responsibilities to the Company.

The following are some common examples that illustrate actual or apparent conflicts of interest that you must avoid. The examples are intended to be a guide only.

4.2 Improper personal benefits

Conflicts of interest can arise when you or a member of your family receive improper personal benefits as a result of your position. You and your relatives should not give unreasonable gifts to, or receive unreasonable gifts from, the Company's customers or suppliers, or others with whom the Company interacts.

We encourage you not to accept a gift (of any kind or value) in circumstances where your business judgment might appear to have been compromised, or where you or the Company would be embarrassed if the gift was made public.



If you are in doubt as to the appropriateness of a gift, please check with the Company Secretary/HR Manager.

4.3 **Financial interests in other businesses**

You should avoid having a significant ownership interest or personal financial interest in any other enterprise if that interest compromises or appears to compromise your loyalty to the Company.

You must disclose all personal financial interests that you or members of your family have in organisations which have established, or are attempting to establish, a business relationship with the Company or which compete with the Company.

Personal financial interests include, among other things, interests resulting from the following relationships:

- (a) officer, Director, employee or independent contractor;
- (b) ownership of shares or other equity interest;
- (c) debtor or creditor (other than in respect of personal financing arrangements with a recognised financial institution, such as mortgages); or
- (d) lessee or lessor.

Ownership of less than one percent of the common or ordinary shares in an entity is not normally considered a conflict.

If you have any doubt about personal financial interests, consult with the Company Secretary/HR Manager.

4.4 **Corporate opportunities**

You must not take advantage of property, information, or other opportunities arising from your position in the Company.

For example, if you learn of a business or investment opportunity through the use of corporate property or information or your position within the Company, you should only participate in the business or make the investment with approval from the Company Secretary/HR Manager. As a general principle, you should only participate in a joint venture, partnership or other business arrangement with the Company with approval from the Company Secretary/HR Manager or CEO.

4.5 **Conflict of interest arising from a personal relationship**

Employees who have the responsibility for or authority to affect the careers or employment of other employees should perform their functions free from any conflict of interest arising from a personal relationship.

For example, a conflict of interest will arise from a personal relationship if you have a family, business or personal relationship (including a personal financial interest, sharing living quarters or a romantic relationship) with any other employee within the Company and that relationship causes, or might reasonably be anticipated to cause, an inability on your part or their part to perform responsibilities objectively and impartially as far as the other party to the relationship is concerned.



You must disclose any conflict of interest arising from a personal relationship to the Company Secretary/HR Manager. Such disclosures will be treated confidentially.

4.6 Outside memberships, directorships, employment and public office

The Company supports involvement of its employees in community activities and professional organisations. However, outside employment or activity must not conflict with an employee's ability to properly perform their work for the Company, nor create a conflict (or the appearance of a conflict) of interest.

Before accepting outside employment or a position on the board of Directors of another company or non-profit organisation, you must carefully evaluate whether the position could cause, or appear to cause, a conflict of interest. If there is any question, consult the CEO, Chair of the Board or Company Secretary/HR Manager.

You must obtain prior written consent from the CEO, Chair of the Board or Company Secretary/HR Manager where the proposed employment or position relates to an outside organisation that has or seeks to have a business relationship with the Company or competes with services provided by the Company.

You may accept public office or serve on a public body in your individual private capacity, but not as a representative of the Company unless authorised by the Board. If such public office would require time away from work, you must comply with Company policies regarding leave of absence and absenteeism.

4.7 Use of company name

You may not use the Company's name or purchasing power to obtain personal discounts or rebates unless the discounts or rebates are made available to all employees.

5 Improper use or theft of Company property, assets and email

You are responsible for protecting any Company property and assets that are under your control and you should safeguard them from loss, theft and unauthorised use.

You have an obligation to report any instances of suspected or actual theft or improper use of Company property to the Company Secretary/HR Manager. Limited use of Company property (such as computers and telephones) is permitted for private and non-income producing purposes, providing it is used in an efficient and prudent manner and the level of use is reasonable in the circumstances.

Company property and assets includes cash, securities, business plans, third party information, intellectual property (including patents and patent registrations, licences, computer programs, software, models and other items), confidential information, office equipment and supplies.

You must not:

- (a) use Company property and assets for any unlawful purpose or unauthorised personal benefit;
- (b) remove Company property and documents from official premises without a good and proper reason. If required to be removed, they should be stored in a secure manner and covered by appropriate insurances; and



- (c) make improper disclosure, including inadvertent or careless disclosure, of competitive business strategies and plans, special methods of operation and other information that is of competitive value to the Company. If you are unsure whether information is of a confidential nature, seek advice from the Company Secretary/HR Manager before disclosure.

You must return Company property and assets immediately upon request by the Company.

6 Confidentiality

In the course of the Company's business, you may have access to business or personal information about the affairs of the Company, its clients, customers, employees, suppliers and business partners. This may include business strategies, marketing and sales plans, competitive analysis, financial plans and forecasts, customer or employee information, supplier information and pricing. Each of the parties expects the confidential nature of the information they have given in good faith to be respected.

You must keep confidential information acquired while you are with the Company, or acting on behalf of the Company, confidential, even after you leave or cease your engagement with the Company.

You must not access, request, make improper use of, transfer or disclose confidential information to anyone else except as required by your position or as authorised or legally required. If confidential information inadvertently comes into your possession it should be returned immediately.

If you are required by an authority to provide confidential information which has not been otherwise authorised, you must notify the Company Secretary/HR Manager.

7 Privacy

The Company respects your privacy and the privacy of others.

You should familiarise yourself with, and comply with the privacy laws of Australia and, where applicable, the jurisdiction of your business unit.

You must respect and maintain the privacy of personal information held or entrusted to the Company by its clients, customers, suppliers, employees and others (including trial participants).

Personal information is information or an opinion, whether true or not, about an individual whose identity is apparent, or can reasonably be ascertained, from that information or opinion.

All personal information of the Company's suppliers, customers, employees and trial participants is to be treated as confidential.

If you have any questions in relation to privacy, please contact the [HR Manager / Company Secretary].



8 Public communications and disclosures

You are responsible for the integrity of the information, reports and records under your control and you are expected to exercise the highest standard of care in preparing materials for public communications.

Those documents and materials should:

- (a) comply with any applicable legal requirements;
- (b) fairly and accurately reflect the transactions or occurrences to which they relate;
- (c) not contain any false or intentionally misleading information, nor intentionally misclassify information; and
- (d) be in reasonable detail and recorded in the proper account and in the proper accounting period.

Media statements and official announcements may only be made by persons authorised under the Continuous Disclosure Policy and Communications Strategy. If you receive a request for information and you are not authorised to respond to the enquiry, refer the request to the appropriate person. Unless the Company Secretary/HR Manager has given prior written consent, Company employees and associated parties must not participate in public forum discussions (including internet-based forums and social media platforms) where the subject matter is related to the Company, its competitors or the industry in which the Company operates.

The Company has adopted the Continuous Disclosure Policy as a means of ensuring compliance with its disclosure and communication obligations under the *Corporations Act 2001* (Cth) and the ASX Listing Rules. The aim of the Continuous Disclosure Policy is to keep the market fully informed of information that may have a material effect on the price or value of the Company's securities, and to correct any material mistake or misinformation in the market.

Ensure that you are aware of the requirements of the Continuous Disclosure Policy and, if it applies to you, you must act in accordance with the policy.

9 Responsibility to shareholders and the financial community

The Company and the Audit and Risk Committee will review and monitor the controls and procedures for preparation of its accounting records and financial statements with guidance from its auditors. The Company will ensure that the accounts and financial information that it provides represent a true and fair view of the financial performance and position of the Company.

If you have contact with the Company's auditors you must fully cooperate with them and not make any false or misleading statement to, or conceal any relevant information from, them.



10 Employment practices

10.1 Equal opportunity and anti-discrimination

The Company is committed to:

- (a) equal employment opportunity;
- (b) compliance with the letter and spirit of a full range of fair employment practices and anti-discrimination laws; and
- (c) a workplace free from any kind of discrimination, harassment or intimidation of employees.

Copies of the Company's Diversity Policy can be found on the Company's website. All employees are expected to be familiar with it.

Any kind of discrimination, bullying, harassment (whether sexual or otherwise) or vilification in the workplace or while off duty (including at third party functions) will not be tolerated.

Discrimination is treating someone unfavourably because of a personal characteristic such as age, race, language, disability, physical features or political beliefs.

Bullying is repeated behaviour directed towards another person or group of people that could reasonably cause them to feel victimised, intimidated, humiliated, undermined or threatened, in all the circumstances.

Sexual harassment is an unwelcome sexual advance, an unwelcome request for sexual favours or other unwelcome conduct of a sexual nature that offends, humiliates or intimidates a person, where a reasonable person would anticipate that reaction in all the circumstances.

The Company will promptly investigate all allegations of discrimination, bullying, harassment or vilification and will take appropriate corrective action. Retaliation against individuals for raising allegations of this kind will not be tolerated. Any complaint made will be treated as confidential.

10.2 Respectful dealing

You must treat each other and all suppliers, competitors, clients, customers and other stakeholders ethically and with respect. You must act honestly and with high standards of personal integrity, and behave with politeness and courtesy. This means not using indecent, offensive or abusive language and never threatening or engaging in violent behaviour such as fighting or assault.

10.3 Occupational health and safety

The Company is committed to maintaining a healthy and safe working environment. All appropriate laws and internal regulations (including occupational health and safety laws) should be fully complied with. All people have obligations to assist in ensuring that this situation is maintained at all times.

On the job, when travelling on Company business or attending work or client functions, the following will not be tolerated:



- (a) excessive consumption or misuse of alcohol;
- (b) misuse of controlled substances; or
- (c) selling, manufacturing, distributing, possessing, using or being under the influence of illegal drugs.

Employees who work from home are encouraged to check that their home environment is safe and free from any potential health and safety issues.

10.4 **Company reputation**

You must not act in any way that could cause harm to the Company's reputation or market position during or after their employment. You have a duty to act in a manner that merits the continued trust and confidence of the public.

10.5 **Securities trading**

The Company is committed to upholding fair and ethical securities trading practices complying with all laws and avoiding any conflicts of interest.

You must not:

- (a) use any price-sensitive information (which is not generally available to others) in deciding whether or not to buy or sell the Company's securities;
- (b) deal with the Company's securities when in possession of price-sensitive information about the Company which has not been publicly disclosed; and
- (c) act contrary to the Company's Securities Dealing Policy (which provides guidance on when employees are likely to possess price-sensitive information).

You should familiarise yourself with the Securities Dealing Policy and ensure you act in accordance with it in conducting any dealing in the Company's securities.

10.6 **Freedom of association and collective bargaining**

The Company respects its officers and employees' rights to join, form or not to join a labour union without fear of reprisal, intimidation or harassment. Where officers or employees are represented by a legally recognised union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

10.7 **Dealings with politicians and government officials**

All dealings with politicians and government officials which relate to the Company and its business activities must be conducted at arm's length and with the utmost professionalism, to avoid any perception of attempts to gain advantage or to improperly influence the outcome of an official decision.



10.8 Bribes, inducements and commissions

A number of countries, including Australia, have strict laws against bribery and corruption. The anti-bribery laws of some countries including Australia, the United States and United Kingdom can apply to things done in other countries (ie. wide-reaching extra-territorial effect). You must comply with and uphold all laws against bribery, corruption and related conduct applying to the Company in all the jurisdictions where the Company operates. The Company will report any actual or intended bribery or corruption to the appropriate law enforcement agencies.

You must not give or receive any money, opportunity or other benefit which could be interpreted as an inducement, facilitation payment, secret commission or bribe (this includes any item intended to improperly obtain favourable treatment or avoid unfavourable circumstances), or otherwise act in an unethical way. Remember that agreeing not to act may have the same ramifications as acting in an unethical way.

Care must be exercised in accepting hospitality, entertainment or gifts over and above that required for the normal conduct or business or which may compromise your impartiality. All officers and employees are prohibited from soliciting any hospitality, entertainment or gifts over and above that threshold.

We are committed to adopting effective systems to counter bribery and related improper conduct and to monitoring and enforcing those systems. From time to time, we may issue further guidance regarding what is acceptable, what you can do with senior manager or Board approval and what is prohibited.

11 Community

11.1 Contribution to the community

The Company is a responsible corporate citizen and actively supports the communities in which we live and work. Each employee is expected to uphold the Company's commitment to pursue good corporate citizenship while engaging in its corporate activity.

You must abide by all local laws and regulations, and are expected to respect and care for the environments in which the Company operates.

The Company supports and encourages you to actively contribute to the needs of the community. If you wish to make such a contribution (such as donations or sponsorship) on behalf of the Company, consult the Company Secretary/HR Manager for approval.

11.2 Environment

The Company is committed to doing business in an environmentally responsible manner and identifying environmental risks that may arise out of its operations.

If you are aware of, or suspect, an action that is not environmentally responsible or in breach of the applicable laws and regulations, report the matter in accordance with section 4 of Part A – 'What to do if you suspect the Code has been breached'.



11.3 **Politics**

You may voluntarily participate in the political process as an individual. We ask that you do not engage in actions that could cause someone to believe that your actions reflect the views or position of the Company.