



TENLOT

Corporate Governance Policies

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Corporate Governance Policies

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SECTION 1 – Introduction

TENLOT Group has developed these Corporate Governance Policies to ensure a professional, ethical, safe and transparent work environment for all employees, officers and directors and Third Parties working on the Company's behalf.

The Policies that follow are relevant in all venues where TENLOT engages in business – whether in its headquarters or branch offices, or in countries and companies in which we promote or conduct business matters.

Your commitment to upholding these Policies is essential to the reputation of TENLOT and its ability to compete in global markets. Failure to follow these Policies may be very costly to TENLOT, in terms of its ability to win gaming licenses, recruit new customers or employees, or even to conduct business in various markets. For this reason, violations of these Policies will not be tolerated and will likely result in disciplinary action.

If you are aware of any violations to these Policies or ethical misconduct, you must report the circumstances immediately to TENLOT's Legal Department.

These Policies should be viewed as an integral part of Terms and Conditions of employment or appointment as a representative of TENLOT and its affiliates, in accordance with any signed Agreements and **TENLOT's Anti-Corruption Compliance and Ethics Policies**.

SECTION 2 – Corporate Ethics and Values

Diversity and Inclusion

As the Company is deeply committed to the betterment of Society, we at TENLOT value diversity, inclusion and respect for all people with whom we conduct business, including our employees, business partners, managers, directors, officers, agents, consultants, suppliers, vendors, etc.

We recognize that our varying ethnicities, cultures, beliefs, perspectives, appearance, political views, genders, etc. reflect the current nature of society and the global communities we serve. By respecting these differences, we create a fair, inclusive culture that enables all of us to work together, in harmony, to achieve our corporate, social and individual goals.

- TENLOT is an Equal Opportunity Employer.
- Discrimination will not be tolerated.
- All Parties are entitled to express their points of view on professional matters.
- Cooperation and good will are key factors in the success of both the organization and the individual.
- TENLOT forbids discrimination, harassment, bullying, retaliation, intimidation, mistreatment or exclusion on the bases of race, national origin or ancestry, skin color, gender or sexual orientation, age, marital status, political or religious beliefs, physical appearance or disability, medical condition, pregnancy or parenthood, etc. Please be mindful of this Policy in interpersonal relationships, including in your communication and humor.

Sexual Harassment and Intimidation

- **Sexual Harassment** comes in various forms, such as by making suggestive comments or propositions; offering professional advancement or advantage in exchange for sexual favors; sharing jokes, cartoons or photos of a sexual or provocative nature; making uninvited physical contact; and even through gossip of an intimate nature. Engaging in sexual, physical, verbal or visual harassment of any other person is strictly forbidden by TENLOT and will not be tolerated.
- **Intimidation** involves any offensive behavior that is intended to insult, belittle, instill fear or to isolate another person, whether through jokes, bullying or communication that mocks or is critical of one's race, ethnicity, religion, gender or sexual orientation, that is used to force change in one's professional performance or advice to the Company against one's convictions, or that is used to extort favors or money from another person.
- Harassment and Intimidation reflect badly on the person(s) engaging in such behavior and, if left undisciplined, reflects negatively on the work environment. TENLOT values dignity and respect for all people and will not tolerate such behavior.

- Sexual Harassment and Intimidation are not funny and “just kidding!” is not a defense. TENLOT will address such issues with the seriousness they deserve.
- To protect TENLOT’s integrity, please contact the TENLOT Legal Department if you see anyone being treated disrespectfully.

Fair and Equal Opportunities

- Advancement in the Company, including pay raises, receipt of bonuses and benefits, training opportunities and promotions will be determined by qualifications and merit.

Data Privacy and Confidentiality

To conduct business, TENLOT must create, collect, store, share, and otherwise process personal data about our employees, directors, officers, customers, partners, suppliers, vendors, customers and other Third Parties.

We are committed to respecting and protecting the privacy rights of individuals by securing and protecting the personal data under our control.

- Personal data may never be accessed or used for purposes other than are required within the scope of one’s job and for which one is authorized.
- Personal data may never be copied, collected, used, stored, shared, or sold without explicit authorization.
- Personal data may only be used for the purpose(s) for which it was collected.
- Employees who work with personal data and need to know the laws applicable to personal data may seek guidance from TENLOT’s Legal Department.
- Employees who work with personal data are forbidden from discussing such data with anyone other than another person authorized to receive such information, and only as it is needed as authorized for a given purpose.

Safe, Secure Workplace

TENLOT is committed to providing a safe, secure workplace for all its employees.

Personal safety and security are managed with the aid of technology. TENLOT reserves the right to use cameras and other surveillance equipment to protect its personnel and property.

- All employees and Third Parties are expected to behave lawfully, safely and professionally.
- All employees and Third Parties are expected to comply with applicable local laws. In the event that you are working in/for a customer in a country where the laws, cultural biases or customs

would place you at personal risk or discomfort, notify your supervisor or the Legal Department immediately.

- Employees are expected to be alert to any information or behavior that would jeopardize a safe, secure work environment.
- Violence, threats and other forms of aggression will not be tolerated.
- Report any suspicious information or behavior that could be a threat to the Company or its personnel.

SECTION 3 – Protection of Assets and Information

Key Assets: People, Property and Information

Most of the value of any company is comprised of its key assets: People, Property and Information.

People are hand-picked to work at TENLOT and become part of a team that strives to achieve the Company's goals. The longer they work for the Company, the more valuable their experience and knowledge are to the organization.

Property includes, but is not limited to: Money and monetary devices; Company-provided equipment and services, including computers and electronic devices, phones, cars, equipment, hardware, software, office supplies, Internet and other subscriptions, etc., which are used by personnel to do their job; Intellectual Property, including patents, copyrights, trademarks and trade secrets, which comprise the know-how of the organization; and Licenses for operating lotteries and gaming businesses.

Information is any kind of data that is used to create a product or service and to market it to a relevant target audience. Information may be strategic, technological, statistical, factual, trend-related, marketing oriented, contact or customer-related, etc. All Company plans and financial information related to products, services, contracts, tenders, contacts, financing, reporting, pricing, relationships, etc. are of great sensitivity and importance. For the sake of clarification, sharing of such information is a form of Disclosure and is forbidden without written authorization by the senior-most Corporate Communication Officer, unless one's job description includes responsibility for Disclosure of corporate information – and then only as prescribed by job responsibilities, securities laws and TENLOT Disclosure protocols.

People, Property and Information have important competitive and commercial value to the Company, so protection of TENLOT's assets is important to the competitive and financial success of the Company. Therefore:

- Please respect and be responsible for TENLOT's property. Report any loss, damage, theft or misuse immediately.
- Use TENLOT Property and Information for appropriate business purposes only. While limited personal use of email, Internet and social media is permitted, TENLOT reserves the right to

monitor electronic devices to ensure that personal use is limited and does not interfere with job responsibilities.

- Never take TENLOT assets for personal use by you or your family, without written authorization by your supervisor. Doing so is considered theft and may be dealt with harshly.
- Retain all receipts for authorized expenses and submit them in expense reports in a timely manner, in accordance with TENLOT policies. You are advised to keep a scanned copy of all receipts and expense reports for your records.
- No employee or Third Party is authorized to speak to the media without permission, coordination and involvement of TENLOT's senior-most Corporate Communication Officer.

Confidentiality

Confidentiality and Non-Disclosure Agreements

All TENLOT employees and Third Parties sign Confidentiality Agreements, also known as NDAs or Non-Disclosure Agreements, at the time of being hired for employment, partnership or provision of products or services.

Err on the Side of Caution: All Information is Confidential

Information about our business, products, processes, customers and contacts, know-how, etc., as described in **Section 3: Key Assets: People, Property and Information**, is our most valuable asset, and sharing it can compromise its value if disclosed inappropriately.

As a rule of thumb: **Assume that all information that relates to TENLOT's products, services, contracts, tenders, contacts, financing, reporting, pricing, relationships, etc. are Confidential.**

Safeguard your work by:

- Not leaving documents on your desk or on your computer screen when you are not present.
- Not using unsecured (password protected) and unprotected (against malware, with firewalls and any form of cyber security required by TENLOT's IT Department) personal electronic devices to send Information.
- Shredding documents before disposing of them.
- Securing your computer at all times, NEVER leaving it unattended in a public place or in plain view in a car, and by maintaining passwords to enter the computer and all confidential documents.
- Refraining from discussing Information in public places and/or in proximity to others who are not part of the discussion.

Do not share TENLOT Information in writing or verbally in any manner to any party unless:

- Your job requires you to share Information – and then only specified Information may be shared.
- You share the information only with the individuals within or outside of TENLOT specified and authorized to receive such Information, and such individuals have signed an NDA or Confidentiality Agreement.
- You obtain permission in writing from your supervisor to share Information with a specified party.

All Information that is of a highly sensitive nature must be marked “Confidential”.

Should you receive or find Confidential Information by accident, please notify the sender, your supervisor and/or the Legal Department promptly.

Company Asset vs. Public Domain

All Information relating to TENLOT provided to employees and/or Third Parties, whether in digital form, hard copy, etc. belongs to the Company at all times and will be considered a Company Asset and will be returned to the Company upon termination, at the end of the term of a contract, an Agreement or project, or upon the Company’s demand.

Company Information accessible in the public domain is considered public information and is not subject to confidentiality restrictions. This includes information provided by TENLOT on its web site(s) and social media pages, directories and company profiles, and published articles and books.

Intellectual Property

Intellectual Property (IP) is a type of Confidential and proprietary Information that includes TENLOT’s trade secrets; methods of operation; patents, copyrights, trademarks and branding; and any other business development that strategically distinguishes our Company from our competitors. When documented properly, certain types of IP add value to a company and/or may protect a company from being copied by competitors.

Examples of TENLOT’s Intellectual Property include

- Business plans and Marketing plans
- Research and Development (R&D) plans and activities
- Engineering and product designs and drawings
- Equipment or software developed by or for the Company
- Documentation, manuals and data bases
- Company Logos, graphic design, artwork, unique packaging, etc.
- Games developed by or for the Company, including methodology, technology and terminology

All new developments, ideas and inventions created while working for or behalf of TENLOT are the sole property of the Company. They should be documented and submitted to the TENLOT Legal Department to be filed as Intellectual Property when appropriate.

If you believe that TENLOT’s Intellectual Property or the IP of a business partner is in jeopardy, contact the TENLOT Legal Department immediately.

Just as Intellectual Property is protected under the law, be cautious about misusing the IP of other companies, such as using unlicensed or copied software, documentation, graphics, articles, photographs,

corporate logos, etc., whether from the Internet or anywhere else, unless permission is obtained in writing. Your misuse of another party's Intellectual Property can be construed as a crime and may have serious consequences for you and TENLOT's executives and is strictly forbidden.

Gaming and Lottery Licenses

As a global operator, TENLOT and some of its executives hold gaming and lottery licenses enabling the Company to operate in this regulated industry according to international standards, as well as local laws and standards.

It is imperative that we operate in accordance with these laws and standards, so as not to jeopardize our licenses and our ability to conduct our business in this industry.

All employees and Third Parties are expected to know and comply with the laws and regulations in the markets in which you work. TENLOT will provide the necessary Policy Policies to employees and Third Parties in its respective markets and is the responsibility of each individual to learn and abide by these Policies. Ignorance of these laws and regulations is not an excuse for their violation.

If you have questions regarding any laws or regulations, discuss them with your supervisor or the TENLOT Legal Department.

If you think that TENLOT or one of its employees or representatives is not abiding by the law or meeting a regulatory obligation, please contact your supervisor or the TENLOT Legal Department immediately.

Employees and Third Parties may not be involved in any interactions with a gaming regulator without the involvement of the TENLOT Legal Department.

All gaming license holders are advised to cooperate with all regulatory and compliance requests to ensure their license remains in good standing.

SECTION 4 – Ethical Business Conduct and Fair Competition

TENLOT's commitment to Ethical Business Conduct and Fair Competition is essential in our industry and a prerequisite to maintaining our status as a leading operator around the globe. These areas, along with antitrust laws, ensure that we are able to compete with other companies fairly, in all countries and jurisdictions in which we currently or plan in the future to conduct business.

Ethical Business Conduct

The Ethics of the Company and employees and representatives is so important at TENLOT that we have a separate Policy elaborating on the topic and our standards: See: **Anti-Corruption Compliance and Ethics Policies**.

These are the highlights these Policies:

Bribery, Facilitation Payments and Unfair Business Practices

Bribery, Facilitation Payments and unfair business practices in any form to or from any person or organization are strictly forbidden: TENLOT forbids our directors, officers, employees, suppliers, agents and affiliates from offering or paying to any person or organization, or soliciting or accepting from any person or organization any bribes, facilitation payments, kickbacks, favors or benefits of any sort.

The use of a third party to circumvent this Policy is also strictly forbidden. TENLOT could be held liable for the corrupt actions of a third party with whom we work.

To avoid any appearance of impropriety

- *Caution and judgement are essential in interaction with governments and their officials; transactions may not be intended or appear to intend to influence business decisions.*
- *The use of cash and cash equivalents is not permitted for transactions on behalf of the Company.*

Charitable and Political Contributions

Charitable and/or political contributions will not be used by TENLOT to improperly influence government officials or obtain business advantages from them.

Business Amenities

No gifts, meals, entertainment, travel or any other item of more than nominal value, also referred to as "Business Amenities", may be provided by TENLOT (or by a third party) to a government official without pre-approval.

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Note: the laws of each country in which TENLOT conducts business may vary. Verify with the TENLOT Legal department prior to giving or receiving any Business Amenity to ensure lawful business protocol.

Business Amenities must not exceed TENLOT's limits and must be substantiated as correlating with legitimate business engagement.

Third Parties

Third Parties include any person or entity serving TENLOT in support of serving the customer. These include sub-contractors, consultants, partners, vendors and suppliers, distributors, agents and brokers. Employment of all Third Parties must be approved by TENLOT's Compliance Department to ensure the circumstances and terms of engagement comply with the ethical principles of the Company.

Financial Transparency

All of TENLOT's transactions must be properly authorized and accurately recorded in the Company's books and records, and all of TENLOT's internal accounting controls must be followed, reported and periodically audited.

Note that all payments of any sort, for products or services, taxes, licenses, travel expenses and business amenities, contributions, penalties, gifts, etc. must be reported and substantiated with tax invoices and receipts.

Hiring and Training

TENLOT hires its employees based on their qualifications relative to the position requirements. Jobs will not be allocated to gain favor with government officials.

From time to time, TENLOT will provide training on anti-corruption laws and this Policy to ensure that Company staff operates ethically at all times. Access to these Policies will be made available upon hiring new employees and throughout their employment. Employees will be notified in writing of any changes to this Policy.

Discipline

TENLOT will not tolerate violations of this Policy or any anti-corruption law. Violation of this Policy may result in loss of employment, legal proceedings, arrest, financial penalties and any other consequence of illegal or unethical behavior in the country of the offense, countries in which TENLOT operates or under international law.

Seeking Advice

All employees are required to seek advice with their supervisor or the TENLOT Legal Department with regard to any question or uncertainty with respect to this Policy. The responsibility of adhering to these Policies falls upon the employee following the hiring process, during which each employee is provided this Policy in writing and required to review it. Ignorance of the Policy is no excuse for its violation.

Preventing, Reporting and Investigating Policy Violations and Non-retaliation

Due to the importance to TENLOT of averting all unethical behavior in the name of the Company, TENLOT will not retaliate or permit retaliation against anyone who reports suspected misconduct in good faith or who cooperates with an investigation. It is the obligation of all employees of TENLOT to prevent financial improprieties and Policy violations, as well as to report and fully cooperate with investigations of any attempted, suspected, potential or actual Policy violations.

Terrorism and Threats to Health and Safety

The health and safety of TENLOT employees is of utmost importance to the Company. Should payments be required to protect life and limb, TENLOT may violate its own code of ethics, even if legal consequences may ensue.

Fair Competition

Fair Competition is a policy, regulated by governments, facilitating a free market, in which the Offering, Price, Quality, Service, Professionalism, etc. of businesses determines their ability to succeed. Unfair competition, in contrast, would describe a market where only certain products may be sold, limiting the offering and quality available in the market or when prices are fixed or regulated. In such circumstances, the incentive to emphasize quality, service and/or professionalism are reduced. Fair Competition encourages more parties to engage in market sectors and to work harder to gain customers...which improves market conditions for customers.

As a Company, TENLOT complies with all antitrust laws, promoting fair competition. In addition, the Company instructs its employees and Third Parties to comply with all laws and regulations pertaining to fair trade, as well as behavior protecting TENLOT's competitive status, namely:

Confidentiality – Employees and representatives of TENLOT are forbidden to discuss any aspect of pricing or business strategies with a competitor or any individual or organization, unless such is engaged in business with the Company, is signed on an NDA or Confidentiality Agreement and the employee or representative of TENLOT is authorized by the Company to engage in such discussions.

Price Fixing – Employees and representatives of TENLOT are forbidden from formally or informally entering into an agreement with a competitor to fix prices, manipulate markets or apportion

territories, or to force customers to make a purchase or enter into an agreement that is conditioned upon another transaction.

Business Intelligence – As a means of making decisions, TENLOT collects information about global and local markets, economies and competitors by using or employing open sources, such as the media and Internet, hiring consultants, meeting with industry representatives and purchasing industry reports. Only legal means of acquiring information may be used by TENLOT and its employees and representatives. Violations will not be tolerated.

Seeking Advice – All employees are required to seek advice from their supervisor and/or the TENLOT Legal Department with regard to any question or uncertainty with respect to this Policy. The responsibility of adhering to these Policies falls upon the employee following the hiring process, during which each employee is provided this Policy in writing and required to review it. Ignorance of the Policy is no excuse for its violation.

International Trade

The international exchange of products, services and funds across national borders is subject to international and national laws and regulations. Knowledge of the laws and regulations pertaining to the business operations of TENLOT is the responsibility of every employee and representative of TENLOT who engages in such activities with specific countries, in cooperation and coordination with TENLOT's Legal Department.

To ensure that individuals and the Company as a whole operate within the scope of such laws and regulations, the following Policies must be followed:

- Prior to engaging parties in a given country, employees and/or representatives of TENLOT must apply to the TENLOT Legal Department for legal trade and ethics Policies for such country. These Policies may pertain to economic laws and sanctions, which may be modified from time to time.
- It is mandatory to consult with the TENLOT Legal Department with regard to any and all Agreements, transactions and shipments to and from such country.
- All shipping and customs documentation must be complete and accurate.
- All international trade must be conducted through the appropriate channels within and outside the Company. Any deviation from procedures, shipping lists, usual intermediaries, routine schedules, etc. should be reported to TENLOT's Legal Department, as they may be an indication of foul play.
- The following are covered by international trade laws: Machines and lottery terminals; Original and replacement parts; Software and Source code; Samples; Demonstration items and Prototypes.

Illegal Financing

As a business that deals with large quantities of money, cash prizes and government licenses, TENLOT has the potential for being exposed to attempts at illegal financing. In an attempt to reduce such risks, the Company maintains safeguards to prevent such involvement, including screening potential customers and representatives. Employees and representatives, however, are always our first line of defense and should be alert to all activity and, particularly, any unusual activity. Any unusual behavior should be reported immediately to the TENLOT Legal Department.

Money Laundering is a method of using legal, legitimate businesses to enable the disguise of funds obtained by illegal means, such as through theft, the sale of drugs or illegally-obtained merchandise, human trafficking, etc. Money Laundering is prohibited by international law and will not be tolerated by TENLOT. As a gaming operator, TENLOT and/or its employees or representatives may be approached to assist in Money Laundering or used as a vehicle for Money Laundering. Any suspicious activity, exposure to large amounts of cash, inappropriate or suspicious behavior should report directly to the TENLOT Legal Department.

Financing of Terrorist Organizations is prohibited by international law and some countries impose sanctions on other countries that support terrorist organizations. It is important for TENLOT to avoid absolutely all transactions that may be perceived in fact or in appearance of supporting Terrorist Organizations or countries that support them.

SECTION 5 – Conflicts of Interest

Conflicts of Interest arise when an individual or organization must choose between opposing loyalties, such as an employee choosing between personal benefit vs. the Company's benefit; or a management team's choice between its own benefit vs. that of the shareholders. Conflicts of Interest are, in fact, a legal issue.

All officers, employees and Third Parties employed or contracted by TENLOT are engaged for the purpose of benefit to the Company. The opportunities that are presented through these engagements are intended to promote the interests of TENLOT for the benefit of its Shareholders.

It is the Company's philosophy to compensate its employees and contractors in a manner that they, too will be rewarded for excellence, thereby providing an incentive to avoid Conflicts of Interest. Failure to do so, however, will result in serious consequences, such as termination and/or legal measures.

The following Policies for avoiding Conflicts of Interest should be strictly followed:

- Loyalty to TENLOT is always the foremost interest of an employee or Third Party.
- Assisting a competitor of TENLOT or competing directly or indirectly against TENLOT is forbidden.
- Providing assistance to business partners and customers outside of the immediate responsibilities of that relationship with regard to a specific project is forbidden without written approval from your supervisor.
- Independent or third party payments or compensation of any kind for work performed on behalf of TENLOT is strictly forbidden.
- Making any decisions or taking personal advantage of business opportunities that will benefit you or someone close to you rather than TENLOT is a strict violation of the Company's confidence in you; such violations will be dealt with severely.
- Personal relationships with employees or third parties working on behalf of business partners, customers and competitors may become the source of a Conflict of Interest or the appearance of one. These include family members, close friends and romantic partners. Such relationships should be promptly disclosed to a supervisor or the Human Resources Department at Tenlot to ensure they are understood and to work through them to the interest of all parties.
- Employees of TENLOT are forbidden to hold other employment simultaneous to their employment at the Company without written permission from a supervisor or the TENLOT Human Resources Department to avoid any Conflict of Interest with regard to time. Prior to running for or accepting any public or political office or board membership, please consult with your supervisor and the Human Resources Department.
- For the benefit of any employee wishing to study or requiring a leave of absence while employed at TENLOT, please consult with your supervisor and the Human Resources Department to ensure that arrangements can be made to find alternative support during your absence.

Insider Trading

Insider trading is when an officer, employee or Third Party of a company uses knowledge of Material Information to make decisions on securities trades, thereby gaining unfair financial advantage. Examples of Material Information include the impending announcement of: good or bad financial results of a company, the termination or retirement of a senior officer, or the outcome of a tender. "Securities" pertains to stocks, options and bonds.

Insiders are company officers, corporate legal counsel, corporate accountants, employees in all capacities, and other Third Parties who may have direct or indirect access to company information, including family members, close friends and romantic partners.

In order for company shareholders and the market to have the same opportunity as Insiders to trade on business developments, there is rigid prohibition against Insider Trading, whether buying or selling, and regardless of whether the information pertains to TENLOT, a business partner or a customer. Rules pertaining to Insider Trading are regulated under Securities Laws and are prosecuted with great severity.

To protect yourself and your loved ones:

- Do not buy or sell securities of TENLOT or of any of our business partners or customers if you have access to Inside Information without contacting the TENLOT Legal Department first. You will be advised regarding limitations and obligations related to trading such securities.
- Do not advise anyone to buy or sell securities based upon Inside Information.
- Do not disclose Inside Information to anyone.

At the present time, shares in TENLOT Group are privately held, however, this status may change at some time in the future. These Policies for Insider Trading are still relevant for any business partners or customers with which TENLOT cooperates or contracts and must be taken seriously.

If you have any questions regarding your exposure to Inside Information, rules pertaining to Insider Trading and/or your ability to make sales or purchases of securities, please consult with TENLOT's Legal Department.

SECTION 6 – Financial Transparency

TENLOT operates its financial affairs and disclosures with utmost accuracy, integrity and Financial Transparency. All of TENLOT's transactions must be properly authorized and accurately recorded in the Company's books and records, and all of TENLOT's internal accounting controls must be followed, reported and periodically audited.

In keeping with Generally Accepted Accounting Principles (GAAP), TENLOT maintains accurate and current internal accounting records for the Company and all of its projects and transactions. Further, the Company files financial reports with regulatory authorities in its countries of incorporation and operation as required by law. In addition to the use of these reports and accounts for tax purposes, they enable the officers of the Company to make informed decisions about company strategy and budget planning.

TENLOT employs experienced Certified Public Accountants to manage its financial books, records and reports to ensure their accuracy.

It is forbidden for an officer or director of the Company, an accountant, a financial advisor or any other employee or agent of the Company to make false, inflated or misleading entries or to omit transactions – such as Business Amenities, which are legal as long as they are of nominal value, or illegal transactions, such as bribes, facilitation payments or kickbacks – in an attempt to disguise impropriety.

Although TENLOT is not, at the time of adoption of these Policies, a publicly-traded company, its standards of financial management and reporting are consistent with those required of publicly-traded companies, including internal controls, reporting and audits.

TENLOT ensures its Executive Officers and Senior Financial Officers abide by the highest ethical standards and integrity with regard to financial management, reporting and transparency. Periodically, they receive training and counseling by securities, legal and accounting professionals to ensure they set a high bar for the Company's commitment to integrity.

TENLOT employees receive company Policies and training to ensure their compliance with the Company's rigid Financial Transparency Policies as they pertain to various positions.

Employees are hereby alerted that their interactions – whether in writing, video and/or audio – may be used as evidence in an evaluation of the Company's integrity with regard to its financial management.

All expenses on behalf of TENLOT, its employees while engaging in business-related activities, and/or its customers / potential customers must be approved in writing by a supervisor and subject to budget allowances, prior to incurring expenses. All employees engaging in the payment of out-of-pocket expenses must save and submit receipts for reimbursement in accordance with the Company's Policies for Financial Transparency.

Records Management

TENLOT's Legal Department is responsible for directing the Company with regard to document retention,

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deletion and destruction, in accordance with laws in the jurisdictions in which the Company operates and relevant Securities Laws.

SECTION 7 – Disclosure

Disclosure is the term used to define communication that reveals material information, or any news that may have an impact on the value of a company's securities. Examples of Material Information include the impending announcement of: good or bad financial results of a company, the termination or retirement of a senior officer, or the outcome of a tender.

Securities Laws require Disclosure of Material Information of publicly-traded companies to be done through media that is universally available to the public. Specific news dissemination services are usually hired to ensure that a Disclosure is issued to news wires and all major media simultaneously. Privately-held companies often use free news dissemination services and/or their own automated distribution lists.

TENLOT's Official Spokesperson

TENLOT manages its Disclosure, public relations, investor relations, marketing material and exclusively through its Corporate Communication function. Reporting directly to the CEO, the senior-most Corporate Communication Officer coordinates all messaging for Executive and Legal approval prior to release. For this reason, only certain TENLOT executives are permitted to speak to media, industry analysts and other outside parties on TENLOT's behalf, in cooperation with the Corporate Communication Office.

The following are the Policies with regard to Disclosure at TENLOT:

- Refer all requests to the senior-most Corporate Communication Officer or the CEO immediately; these include, but are not limited to: all types of reporters, market researchers, customers, regulators, government agencies, non-profit organizations, lobbyists, students, etc. requesting the following:
 - Interviews or reactions (written, video or audio)
 - Written quotes or comments
 - Video or radio clips
 - Photos of company executives or products
 - Company logos or packaging
 - Company financial reports or documents
 - Comments regarding the Company's web site and social media
 - Corporate contributions, sponsorship or merchandise

IMPORTANT: Not all enquiries are innocent; for instance, a request for an interview may be a competitor seeking business intelligence or a private individual seeking investment information. For this reason, employees are strictly forbidden from speaking with anyone from outside the Company who seeks information, without receiving permission and approval of the message to

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be conveyed. Again: Refer all requests to the senior-most Corporate Communication Officer or the CEO immediately.

- Do not provide the media with written or spoken messages about or on behalf of the Company unless you have permission to do so and have received approval of the written messages you would like to convey. Permission is only relevant to the original request and does not pertain to subsequent media requests, even if by the same individual on the same topic.
- Remember: as an employee of TENLOT, you represent the Company to others at all times. Anything you say can affect the Company positively or negatively and may have serious financial and legal consequences.
- Public discussion or speculation about the Company's performance, activities, partners, customers, markets, future plans, technologies, etc. are strictly forbidden.

Social Media

Social Media, the public square of our times, has proven to be a platform for personal expression, public information and debate, as well as public humiliation. Information conveyed on Social Media may not always be controlled, protected or permanently deleted. For these reasons, TENLOT has very specific Policies regarding Social Media.

Social Media is a form of Media – among others, for the purpose of Disclosure – and therefore, any business-related information posted on Social Media, of any form or on any App, with regard to TENLOT, its business partners or customers must be approved by the sole Spokesperson of the Company, the senior-most Corporate Communication Officer and must fall within these Policies:

- It is forbidden to share Confidential Information or Material Information without written permission from the senior-most Corporate Communication Officer.
- Comments and speculation about TENLOT's business activities and performance are prohibited online...as well as in other media. (See the Disclosure section.)
- Social Media should never be used to vent grievances with the Company, its employees, Third Parties or Customers. Such behavior may have serious consequences – both for the subject of such posts and for you personally. Grievances should be reported to your supervisor or to TENLOT's Human Resources Department, where they will be handled seriously and with respect.
- Private posts on Social Media are an expression of your personal views only, however, beware that your personal views may conflict with your responsibilities as an employee or Third party of TENLOT, as well as the Company's values. Racist, sexist, illegal, discriminatory and defamatory expressions and activities online, as well as bullying and hate-mongering are examples of such conflict. You are hereby notified that such expressions and activities may have implications on your status with the Company, its business partners and customers.
- Online networking tools, such as LinkedIn, may be used for professional activities, including networking for suppliers, employees, industry experts, etc. However, you may not post any

Confidential Information, Material Information or proprietary information within your TENLOT-related profile.

- As a rule of thumb – when using Social Media:
 - Do NOT share Confidential Information, Material Information or proprietary information.
 - Comply with the law and the Conditions for Use for each site.
 - Use credits and disclaimers as appropriate.
 - Refrain from use of offensive, discriminatory and retaliatory expressions.
 - Be aware that TENLOT monitors mentions about the Company in the media

SECTION 8 – Corporate Citizenship

Corporate Citizenship is a term that reflects a company's contribution and impact on a community, based on its behavior, ethics and values. As a lottery and gaming license holder, TENLOT has built Corporate Citizenship into its business model, by ensuring that a percentage of all profits generated by its business and partnerships are donated to social development projects. But this is only one aspect of the Company's commitment to being a force for good in society.

Responsible Gaming

Responsible Gaming involves providing lawful and fair play and opportunities to win, while engaging in prevention of the adverse side-effects of gaming and gambling, namely addiction. TENLOT works closely with its business partners and customers to operate responsibly and to engage in educational programs to support Responsible Gaming in its global markets.

- TENLOT, its employees and Third Parties are committed to Responsible Gaming and require its business partners and customers to operate lawfully within their respective communities.
- The Company provides mandatory training to convey the principles of Responsible Gaming, both within the Company and among relevant employees of its business partners and customers.
- Violations of Responsible Gaming Policies should be reported to your supervisor or the TENLOT Legal Department to help us to maintain our commitment to safe and fair gaming.

Participating in Lottery and Gaming

TENLOT employees and Third Parties must follow local and international laws and regulations pertaining to their ability to participate in Lotteries and Games, particularly those operated by the Company. Your specific restrictions may differ from someone else's based on the markets you work in, what aspect of the games TENLOT provides, or on your licensing status.

As a rule of thumb:

- Assume that you and your family members' ability to participate in lotteries and games are off-limits in your country of employment. To clarify, contact your supervisor or TENLOT's Legal Department.
- TENLOT employees and Third Parties – and typically, family members of TENLOT employees and Third Parties – may not participate in, claim or receive benefit from any lottery game sold by a customer to which TENLOT provides services or products.
- TENLOT will provide all employees and Third Parties with access to an up-to-date list of venues, games, customers, etc. where play is prohibited.

- Violations of prohibitions can be very serious. Please be cautious and verify and play it safe.

Human Trafficking

Human Trafficking is a modern form of slavery which appears in all parts of the world. Examples include the use of children, minorities or the poor as an illegal source of unpaid, low-pay or forced labor, including but not limited to the sex trade, caregivers and unskilled workers. Typically, those who engage in Human Trafficking withhold travel documents and wages, and employ coercion, threats of violence and lethal means of enforcement. Efforts globally to fight Human Trafficking are increasing awareness of the scope of the problem. TENLOT will not tolerate or support Human Trafficking within our Company or the businesses of our Third Parties, business partners or customers. Any such incident brought to the attention of the Company will be promptly reported to the relevant authorities.

- Be alert to suspicious circumstances. Vendors who offer below-market pricing may be able to do so by using forced or low-wage labor. Victims of Human Trafficking may try to signal you that they need help.
- All TENLOT employees and Third Parties are required to report to the TENLOT Legal Department any suspicion of Human Trafficking. Under no circumstances should an individual investigate or pursue the matter on their own.

Environmental Responsibility

As a global corporate citizen, TENLOT is committed to doing its part to care for the environment within the scope of its own businesses and, wherever possible, to set a positive example for the businesses of its Third Parties, business partners and customers. We are committed to meeting, and, whenever possible, exceeding legal and recommended environmental requirements, including by reducing our waste output and recycling.

To ensure TENLOT is doing its utmost to preserve the environment:

- Report any potential environmental hazards immediately.
- Never alter, tamper with or in any way falsify environmental tests, monitoring systems or sensors. Such behavior will not be tolerated.
- Dispose of recyclable materials in the containers appropriated for this purpose.

Volunteering and Charitable Giving

True Corporate Citizenship requires our interaction and cooperation in the local communities in which TENLOT operates. In addition to our social agenda, as a partner in social development, our employees and representatives are encouraged to participate in activities that will have a positive impact in their communities through volunteerism.

These are other ways in which TENLOT supports Volunteering and Charitable Giving:

- TENLOT ensures full supervision and transparency with regard to its support of social impact projects, independently and through its global partnerships, to ensure its social agenda is implemented ethically.
- TENLOT provides charitable contributions and sponsorships from time to time, according to the Company's Policies. To learn more, contact the TENLOT Corporate Communication Office.
- Employees are encouraged to inform TENLOT of their Volunteering and Charitable Giving activities, in the event that the Company has the opportunity to support the employee's efforts.
- Volunteering, Charitable Giving and sponsorship may not be used to achieve influence or unfair business advantage on TENLOT's behalf.

Political Activities and Contributions

Due to the nature of our business, in which TENLOT partners with governments on the national, regional and local levels, involvement of our Company and its employees and Third Parties may be somewhat restricted. That said, the Company recognizes the importance of citizenship and political involvement.

Therefore, please observe the following Policies for Political Activities and Contributions:

- Political involvement and support may be conducted on an individual basis on personal time. This includes voting, volunteering, paid and in-kind contributions, party affiliation, demonstration, etc.
- Do not engage in political activities, including support, fundraising, lobbying or other promotion of candidates or parties, on Company property, using Company assets or personnel.
- Do not use TENLOT finances, assets, contacts, etc. to support, fundraise, lobby or promote candidates, parties or political issues.
- TENLOT does not discriminate against individuals based on their political affiliation or views.

SECTION 9 – Preventing Ethical Violations and Non-retaliation

Due to the importance to TENLOT of averting all unethical behavior in the name of the Company, TENLOT will not retaliate or permit retaliation against anyone who reports suspected misconduct in good faith or who cooperates with an investigation. It is the obligation of all employees of TENLOT to prevent financial improprieties and Policy violations, as well as to report and fully cooperate with investigations of any attempted, suspected, potential or actual Policy violations.

All agents and representatives of TENLOT, including sub-contractors, suppliers, consultants, and other relevant Third Parties responsible for upholding the ethical behavior of the Company, will enjoy the same protection from retaliation in reporting any suspected misconduct or cooperating with an investigation.

Confidentiality will be assured to all such individuals regardless of the outcome of the investigation.

SECTION 10 – Contacts

Throughout this Corporate Governance Policy, employees and Third Parties have been referred to various offices of TENLOT to obtain assistance and further information, as well as to report violations of these Policies.

These are the Departments and the contact information you should have in your possession at all times, in the event they are needed.

- TENLOT Legal Department - Legal@TENLOT.com
- TENLOT Human Resources Department - HR@TENLOT.com
- TENLOT Corporate Communication Department - CorpCommos@TENLOT.com