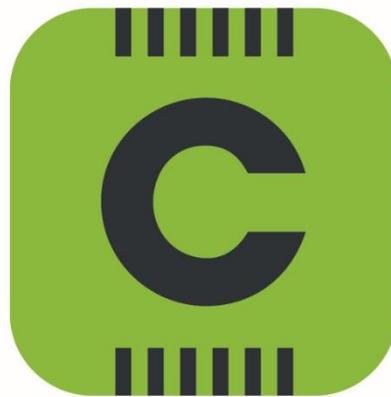


Codere Online

Whistleblower Channel Policy

March 2022



Approved by Codere Online Luxembourg, S.A.'s Board of Directors

Table of Contents

1. PURPOSE	2
2. TO WHOM DOES THE POLICY APPLY?.....	3
3. WHAT CAN AND SHOULD BE REPORTED?	3
4. HOW CAN I SUBMIT A COMPLAINT?	4
5. WHEN SHOULD A COMPLAINT BE MADE?	5
6. HOW DOES THE CHANNEL OPERATE?	5
a. Steps following the submission of a complaint.....	5
b. Information to be provided when making a complaint	6
c. Identification when submitting the complaint: anonymity	6
d. Fair and responsible treatment of complaints	7
7. DATA PROTECTION AND RETENTION	8
DATA PROTECTION POLICY	8
Data controller	8
Main purpose: Investigation of the complaint.....	8
Accessory purpose: Statistical analysis	8
Origin and data processed	9
Data retention period.....	9
Data communication.....	9
International transfers.....	9
Rights management	10
8. EFFECTIVENESS AND UPDATING.....	10
9. RELATED PROCEDURES	10

1. PURPOSE

This Whistleblower Channel Policy (the "**Policy**") lays down the guidelines for the internal whistleblower channel (the "**Whistleblower Channel**") in accordance with the Code of Ethics and Integrity (the "**Code**"), the policies, manuals and procedures issued in this respect, and the authority granted by the Board of Directors of Codere Online Luxembourg, S.A. ("**Codere Online**") derived from the operating regulations of Codere Online's Compliance Committee (the "**Compliance Committee**").

The Codere Online Group comprises Codere Online. and all subsidiaries over which it has or may have direct or indirect control ("**Codere Online Group**").

This Policy sets out the following specific requirements:

1. it allows complaints to be made in writing or electronically, and also in person if the complainant so wishes;
2. receipt of the complaint is acknowledged within 7 days;
3. it allows the ad hoc appointment by the Compliance Committee of a person responsible for the investigation, who will process the complaints and maintain contact with the complainant and, if necessary, will be responsible for requesting additional information and responding thereto;
4. a thorough examination of all complaints (including anonymous complaints); and
5. establishment of a general deadline of 3 months to reply to the complainant on the processing of the complaint, commencing from the acknowledgement of receipt.

The purpose of this Policy is to inform Codere Online Group's employees, officers directors and third parties of their duty to use the Whistleblower Channel and provide guidance on how to use it in the event that a person becomes aware of possible breaches of the Code, other Codere Online's policies and procedures or applicable internal rules or regulations.

The employees, officers, directors and third parties of Codere Online Group have a duty to report any infraction of which they become aware immediately, once they have reasonable grounds to believe that the information they report is true and contains potential irregularities.

As an overarching principle, retaliation for filing a complaint is strictly prohibited in Codere Online Group.

2. TO WHOM DOES THE POLICY APPLY?

This Policy is applicable to and mandatory for all professionals of Codere Online Group (directors, officers including Codere Online's chief executive officer, chief financial officer, chief accounting officer or controller, or persons performing similar functions), managers and collaborators in general), regardless of their hierarchical level and their geographical or functional location, as well as for all those who wish to start a working or business relationship with Codere Online Group.

Individuals who become employees of Codere Online Group in the future will accept the full content of this Policy, which will be attached to their employment contracts and published on Codere Online's intranet and website (www.codereonline.com) for consultation.

This Policy will be communicated and disseminated among the professionals of Codere Online Group and will be disclosed externally to business partners, suppliers and other third parties related to the group, as determined.

The Compliance Committee is responsible for all the activities included in this Policy, including monitoring, updating and improving it.

3. WHAT CAN AND SHOULD BE REPORTED?

This Policy encourages the reporting of any concerns that the complainant may have regarding possible breaches of the Code and other Codere Online's policies and procedures, as well as the raising of any questions concerning their interpretation or situations that are not envisaged therein. This includes information on infractions in a broad sense, i.e. reasonable suspicions, actual or potential breaches that have occurred or are likely to occur, etc.

This includes potential reports on the following subjects, among others:

- reporting an event that may constitute non-compliance with policies concerning the prevention of money laundering and terrorist financing;
- preventing bribery and corruption;
- working in a safe and healthy environment;
- avoiding conflicts of interest in any actions related to professional performance;
- preventing discrimination, as well as sexual and non-sexual harassment;
- preventing internal fraud;
- protecting fair competition and international trade rules;

- responsible use of company assets;
- safeguarding fiscal integrity, business integrity and the integrity of financial records;
- creating an inclusive and respectful workplace;
- safeguarding Codere Online's information, the disclosure of which could affect the interests of Codere Online Group or the legitimate rights of third parties;
- protecting Codere Online from cyber-attacks;
- protecting human rights; and
- complying with international and local laws and customs, limiting relations with public administrations to professional matters.

No person, regardless of his or her level or position, is authorised to request that a professional commit an illegal act or contravene the provisions of the Code. In turn, no professional may justify improper, illegal or contravening conduct with regard to the Code on the basis of an order from a superior.

4. HOW CAN I SUBMIT A COMPLAINT?

If there are reasonable indications that an irregularity or an act against the legality or the rules of action of the Code and its related policies, procedures and manuals has been committed, the complainant may (i) inform the following persons: the immediate superior, the local Compliance Officer (“**Local Compliance Officer**”) and Codere Online’s Chief Compliance Officer (“**Codere Online’s Chief Compliance Officer**”) or (ii) report the situation by sending an email to the following address: ethicalchannel.online@codere.com (“**Whistleblowing Address**”).

Professionals and third parties that enter into a business relationship with Codere Online Group also have access to the above Whistleblowing Address for the purpose reporting any of the situations described above.

A person who submits a report may do so by identifying themselves or, if they deem it more convenient, anonymously. Codere Online Group will not tolerate any form of direct or indirect retaliation against professionals who have truthfully reported an anomalous action.

Without prejudice to the Policy, Codere Online Group’s policy is that it will not tolerate any form of retaliation against any person who, in good faith, reports any potential noncompliance with the Code and/or the legal rules in force and/or the procedures or regulations issued in this regard.

The Code will be strictly enforced and violations will be dealt with immediately. If it is determined that an employee, director or officer of Codere Online Group has

carried out activities which contravene the provisions of any law, rule or regulation, internal policies and procedures or the Code, disciplinary measures will be applied in accordance with the provisions of the applicable labour legislation, without prejudice to any internal procedure or sanctioning policy which could be approved in the Codere Online Group. Violations of the Code that involve illegal behaviour will be reported to the appropriate authorities.

5. WHEN SHOULD A COMPLAINT BE MADE?

The employees, officers, directors and third parties of Codere Online Group have a duty to report any infraction of which they become aware immediately, once they have reasonable grounds to believe that the information they report is true and contains potential irregularities.

Complaints must always be made in good faith.

6. HOW DOES THE CHANNEL OPERATE?

a. Steps following the submission of a complaint

Information on potential irregularities may be received through the Whistleblower Channel set up for this purpose, or by any of the other means provided and included in the Code (e.g. immediate superior, Local Compliance Officer, Codere Online's Chief Compliance Officer, the Compliance Committee, or by the Whistleblowing Address published on Codere Online's intranet and website (www.codereonline.com)).

Access to the Whistleblowing Address is limited to specific individuals within Codere Online who are authorised to manage it (Codere Online's Chief Compliance Officer, who will report to the Compliance Committee, and one member of the Committee, namely the General Counsel).

The Compliance Committee is responsible for investigating any matter that comes to its attention (report through the Whistleblower Channel, immediate superiors, etc.) that may indicate a breach of Codere Online's internal or external regulations, as well as conduct that may imply the commission of any irregularity or unlawful act by Codere Online Group professionals in the performance of their work or by third parties who contract or deal with the Codere Online Group in the framework of such dealings. These investigations and their follow-up will be carried out by the team of internal employees and external service providers that ensure the adequate operation of this Policy led by Codere Online's Chief Compliance Officer.

Any complaint indicating a possible breach of the Code or any other Codere Online policies and procedures will lead to the opening of an investigation in accordance with Codere Online's Complaints Management and Internal Investigation Procedure (the "**Complaints Procedure**").

The Compliance Committee will regularly analyse the complaints received and, if appropriate, will take the requisite action based on the specific circumstances of each complaint. Codere Online will provide information to the complainant about the complaint and, to the extent possible, the outcome of the evaluation of the issue. In some cases, there may be limitations on the updates that can be provided on the complaint, in accordance with the Complaints Procedure. In any event, the immediate superior, Local Compliance Officer and/or Codere Online's Chief Compliance Officer must be informed immediately in order to deal with the matter as efficiently as possible in accordance with applicable regulations and with the Complaints Procedure.

b. Information to be provided when making a complaint

The information to be reported should be as complete and truthful as possible. All information known to the complainant in relation to the possible infringements should be shared in detail, including any evidence or documents that will enable the case to be dealt with as swiftly and efficiently as possible.

The confidentiality of complaints received will be guaranteed at all times and anonymous communications will also be dealt with. In the event that a complaint is not anonymous, the identification of the complainant can not, under any circumstances, be provided to the person against whom the complaint is addressed.

It will be essential for the complainant to provide minimal evidence of the alleged fact(s), which will allow the information received to be analysed and to rule out any possibility of a false allegation.

c. Identification when submitting the complaint: anonymity

A person who reports a potential breach of any law, rule or regulation, internal policies and procedures or the Code, may do so by identifying themselves or, if they deem it more convenient, anonymously. Codere Online will not tolerate any form of direct or indirect retaliation against professionals who have truthfully reported an anomalous action.

However, Codere Online encourages complainants to identify themselves by providing their name, position or relationship with Codere Online Group and contact details. This allows staff dealing with the complaint to be able to contact the complainant for follow-up purposes, if necessary. Codere Online considers that this is the best way to demonstrate its non-retaliation policy in the event of a complaint.

In this respect, we must bear in mind that when a (non-anonymous) complaint is submitted, Codere Online ensures that the Complaints Procedure will be conducted in a secure manner guaranteeing confidentiality with respect to the complainant's identity and other related information.

The Whistleblowing Channel allows and guarantees the confidentiality of communications, even anonymous ones, regarding the commission of irregularities or acts contrary to the law, rules or regulations, internal policies and procedures or the Code.

The existence and details of this Whistleblower Channel will be communicated to the professionals, partners, clients and suppliers of Codere Online Group in all the territorial areas in which it operates.

d. Fair and responsible treatment of complaints

The Compliance Committee will ensure that complainants' rights are respected and that the rights of the employees named in the complaints are also protected in accordance with this Policy.

Once a complaint has been received, the Codere's Online Chief Compliance Officer will determine whether or not to process it within a maximum of 7 days from the receipt of the complaint. To this end, prior to the decision to accept or dismiss the complaint, Codere's Online Chief Compliance Officer may request the information required for its initial assessment. It may also ask the complainant for additional information to that contained in the complaint.

Codere's Online Chief Compliance Officer will not admit complaints in which:

1. the reported action is manifestly unfounded or implausible;
2. it is outside its sphere of competence;
3. the events reported were already fully investigated and resolved by the him/her, the Compliance Committee; or by the Local Compliance Officer, and
4. the minimum components required to analyse the admissibility of the complaint are not included, and the complainant cannot be contacted for further information.

The principle of proportionality must be respected so that the complaints only refer to cases in which the facts or actions are actually involved in the relationship between Codere Online and the reported person, having specified the actions that must be reported and specifying the rules to which the complaints may refer in the law, rules and regulations, internal policies or procedures or the Code. In the event that any notification or information is received on other matters that do not fall within its sphere of competence, they will be forwarded to the appropriate body.

The processing of complaints requires the classification by Codere's Online Chief Compliance Officer for internal use of the content of the complaint, which will enable the treatment to be adjusted to the content of the complaint. This classification of complaints is set out in the Complaints Procedure.

7. DATA PROTECTION AND RETENTION

Pursuant to Article 24 of Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guaranteeing of Digital Rights (the "**Data Protection Act**"), the creation and maintenance of whistleblower channels is lawful as long as the complainants and third parties involved are informed thereof. In this respect, Codere Online has made the following information available to all interested parties:

DATA PROTECTION POLICY

Data controller

The data provided through the complaint form and data obtained in the course of the investigation will be processed by Servicios de Juego Online S.A.U. with TIN: A- 88102009 and registered office in Avenida de Bruselas nº 26 – Alcobendas - Madrid 28108, on behalf of Codere Online Group.

You may contact our Data Protection Officer at any time at the following address: dpo.codere@codere.com

Main purpose: Investigation of the complaint

The personal data of the complainant, the reported party and all persons who may be aware of the reported facts will be examined for the purpose of detecting, investigating, processing and resolving the reported complaints, with the purpose of preventing - and, if necessary, correcting - the commission of crimes or violations of applicable legislation. Codere Online also has a legitimate interest in detecting and investigating behaviour that is irregular and/or contrary to its internal codes of conduct.

Further information on the legal basis of Codere Online's legitimate interest and how it is balanced with the rights and freedoms of the interested parties may be requested by writing to us at proteccion.datos.es@codere.es

Accessory purpose: Statistical analysis

In addition, the aforementioned data may be processed in aggregate form for the purpose of extracting metrics, statistics or information on matters such as: number of complaints, main facts reported, processing status and average processing time.

Origin and data processed

To achieve these purposes the data provided by the complainant on the relevant form will be processed, as well as any other data that may result from the investigation. In general terms, the data processed will be of the following type:

- identification data: name, surname, contact details (in the case of non-anonymous complaints);
- details of employment in Codere Online Group;
- relationship with Codere Online Group, and
- reported infringements and evidence thereof.

Data retention period

Personal data entered in the Whistleblower Channel will be deleted three months after the submission of the complaint, unless the processing is necessary for the investigation of the conduct reported. In the latter case, they will be processed until the completion of the investigation and, where appropriate, the adoption of disciplinary measures or the relevant judicial or administrative proceedings.

Data communication

The personal data processed in the investigation of the complaint will only be accessible by Codere Online employees that carry out internal control and compliance functions, and by companies which, under the instructions of Codere Online, provide a service for which access to this data is necessary (as data processors, if applicable).

However, said personal data could be communicated to other employees of Codere Online Group or to third parties (public authorities, judges or courts) when it is necessary for the adoption of disciplinary measures or for the arrangement of any legal action that may be necessary.

International transfers

Codere Online may carry out international data transfers outside the European Economic Area. In such cases, Codere Online will ensure the security of such transfers through one of the following guarantees: (i) the country of destination has been the subject of an adequacy decision issued by the European Commission, (ii) Standard Contractual Clauses issued by the European Commission, (iii) Binding Corporate Rules, (iv) authorisation from a data protection authority and/or any others that legitimise, under current regulations, the security of the transfer in accordance with the standards required by the European authorities.

Further information about international transfers that may be carried out by Codere Online in relation to your personal data and the relevant safeguards may be obtained by writing to us at: protección.datos.es@codere.com

Rights management

You may exercise your right of access, rectification, opposition, erasure, restriction of processing and portability by writing to the email address protección.datos.es@codere.com or by post addressed to Avda. de Bruselas núm. 26, PC: 280108 Alcobendas (Madrid). Notwithstanding case-by-case analyses, the application of these rights may be subject to restrictions in order to ensure a balance between the right to data protection and the objective pursued by the Whistleblower Channel.

You are also entitled to lodge a complaint with the Supervisory Authority (in Spain, the AEPD) or with our Data Protection Officer.

8. EFFECTIVENESS AND UPDATING

This Policy was approved by the Codere Online Audit Committee and Board of Directors on March 30, 2022 and will be applicable as of that date.

However, the organisation undertakes that this Policy will be reviewed regularly to ensure that it remains in line with new legal and regulatory requirements, business opportunities and market developments.

9. RELATED PROCEDURES

- I. Complaints Management and Internal Investigation Procedure