

# bragg

## WHISTLEBLOWER POLICY

Effective as of August 12, 2025



## **BRAGG GAMING GROUP INC. WHISTLEBLOWER POLICY**

### **1. GENERAL**

Bragg Gaming Group Inc. and each of its subsidiaries (collectively, the “Company”) is committed to maintaining the highest standards of business conduct and ethics. It is the policy of the Company to comply with, and require its directors, officers, employees, contractors and consultants of the Company (who are collectively referred to as “Company Personnel”) to comply with all applicable legal and regulatory requirements relating to the Company’s business, including its corporate reporting and disclosure, accounting and auditing controls and procedures, securities compliance and other matters pertaining to fraud against shareholders. All Company Personnel have the responsibility to assist the Company in meeting these requirements.

Pursuant to its charter and applicable securities laws, the Audit Committee (the “Audit Committee”) of the board of directors (the “Board”) of the Company is responsible for ensuring that a confidential and anonymous process exists whereby persons can report concerns to the Company. In order to carry out its responsibilities under its charter and to maintain the highest ethical standards in the conduct of its business, the Board has adopted this Whistleblower Policy (the “Policy”).

In connection with those requirements and with a view to encouraging ethical business conduct, the Board has adopted this Policy to ensure that:

- (a) complaints are received, investigated and retained on a confidential and anonymous basis that is in compliance with all applicable laws; and
- (b) individuals reporting a complaint will not be penalized or retaliated against for making a good-faith report of a complaint.

This Policy applies to all Company Personnel. Nothing in this Policy prevents Company Personnel from reporting suspected wrongdoing or misconduct to the Ontario Securities Commission, a recognized self-regulatory organization or law enforcement agency.

### **2. PURPOSE**

The purpose of this Policy is to establish procedures for:

- (a) the receipt, retention, and treatment of complaints received by the Company regarding accounting, internal accounting controls, or auditing matters, or breaches of the Company’s Code of Business Conduct and Ethics, Insider Trading Policy and any other Policy, charter or mandate of the Company, or applicable laws, rules and regulations; and
- (b) the confidential, anonymous submission by Company Personnel of concerns regarding questionable accounting or auditing matters, or breaches of the Company’s Code of Business

Conduct and Ethics, Insider Trading Policy and any other Policy, charter or mandate of the Company, or applicable laws, rules and regulations (each of (a) and (b), a “Reportable Activity”).

The purpose of this Policy is also to state clearly and unequivocally that the Company prohibits discrimination, harassment and/or retaliation against any person who (i) reports complaints to the Audit Committee regarding Reportable Activities or (ii) provides information or otherwise assists in an investigation or proceeding regarding any conduct that he or she reasonably believes to be a violation of employment or labour laws, securities laws (including the rules or regulations of the Ontario Securities Commission, the United States Securities and Exchange Commission, the Toronto Stock Exchange, the Nasdaq or any other applicable securities regulator or stock exchange upon which the Company’s securities are listed), laws regarding fraud or the commission or possible commission of a criminal offence. All Company Personnel are responsible for ensuring that the workplace is free from all forms of discrimination, harassment and retaliation prohibited by this Policy. No Company Personnel have the authority to engage in any conduct prohibited by this Policy.

This Policy protects:

- (a) any Company Personnel who legitimately and in good faith discloses a Reportable Activity by any person with supervisory authority over the Company Personnel, or any other Company Personnel who has the authority to investigate, discover or terminate pursuant to conduct prohibited by this Policy;
- (b) any Company Personnel who legitimately and in good faith files, causes to be filed, testifies, cooperates, participates in, or otherwise assists in a proceeding filed under employment or labour laws, securities laws or laws regarding fraud;
- (c) any Company Personnel who legitimately and in good faith provides information, causes information to be provided, or otherwise assists in an investigation, regarding any conduct that the Company Personnel reasonably believes constitutes a Reportable Activity when the information or assistance is provided to or the investigation is conducted by law enforcement, regulatory authorities, a legislature, or the Company; or
- (d) any Company Personnel who in good faith submits any complaint to the Audit Committee for any conduct that the Company Personnel reasonably believes constitutes a Reportable Activity.

If any Company Personnel legitimately and in good faith makes a complaint regarding any of the activities listed above, the Company will not discharge, demote, suspend, threaten, harass or otherwise discriminate or retaliate against him or her in the terms or conditions of employment or provision of services because of that activity. However, since such allegation of impropriety may result in serious personal repercussions for the target person or entity, the Company Personnel making the allegation of impropriety should have reasonable and probable grounds before reporting such impropriety and should undertake such reporting in good faith, for the best interests of the Company and not for personal gain or motivation. If an investigation reveals that a complaint was frivolously made, undertaken for improper motives, made in bad faith or without a reasonable and probable

basis, the complainant's supervisor will take whatever disciplinary action may be appropriate in the circumstances.

### **3. USE OF REPORTING TOOL**

To ensure secure, confidential and consistent handling of reports across all jurisdictions, the Company uses the Whistleblower Software ApS platform (the "WS Platform"), or a comparable secure reporting tool, for the receipt, examination, and processing of complaints and concerns regarding Reportable Activity. The WS Platform enables:

- (a) secure and encrypted communication with Company Personnel;
- (b) anonymous or identified reporting at the discretion of the complainant;
- (c) secure documentation and recordkeeping in compliance with relevant legal standards (*e.g.*, ISO 27001, SOC 2); and
- (d) centralized review by the Chair of the Audit Committee through the dedicated e-mail address: [whistleblower@bragg.group](mailto:whistleblower@bragg.group).

In jurisdictions where the appointment of a local trustee is mandated by applicable law or regulatory requirements, the designated trustee will receive and review reports submitted via the WS Platform, in accordance with local obligations. In such cases, the trustee is granted access to the platform for that jurisdiction and processes the report in line with both local legal requirements (and any adaptations of this Policy derived therefrom) and the overarching principles set out in this Policy. The Chair of the Audit Committee shall retain oversight and will be informed or consulted as appropriate.

All Company Personnel are encouraged to use the WS Platform to submit complaints and concerns regarding Reportable Activity. A secure link to the WS Platform is provided on the Company's official website.

### **4. REPORTING PROCEDURES**

The Audit Committee is responsible for administering the Policy. If a person reasonably believes that any Company Personnel or other person acting on behalf of the Company has committed a Reportable Activity, that individual should immediately report his or her concern through the WS Platform.

Alternatively, concerns can also be submitted as follows:

- (a) in writing, by forwarding a sealed envelope to the Chair of the Audit Committee. The envelope should be delivered to the attention of "Chair of the Audit Committee, Bragg Gaming Group Inc.", and bear an appropriate label, such as "To be opened by the Chair of the Audit Committee only, being submitted pursuant to the Whistleblower Policy adopted by the

Company.” If management receives any such envelope, it shall be forwarded promptly and unopened to the Chair of the Audit Committee; or

(b) by e-mail at the following address: [whistleblower@bragg.group](mailto:whistleblower@bragg.group).

If Company Personnel would like to discuss any matter with the Chair of the Audit Committee, that should be indicated in the submission along with a telephone number or email address at which they may be contacted if the Chair of the Audit Committee deems it appropriate.

If any person is not comfortable reporting a concern to the Chair of the Audit Committee, he or she should report the concern to any supervisor or member of management whom he or she is comfortable approaching. Any manager or other supervisory employee who receives a report of a Reportable Activity must immediately forward the report to the Chair of the Audit Committee, maintaining anonymity of the reporting individual if that individual so desires (see below). The Chair will communicate all reports of alleged Reportable Activities to the Audit Committee and, if necessary, to the Board. In circumstances of impropriety alleged against the Board, as a whole or any member thereof, the Chief Executive Officer shall be responsible for investigating such allegations and the Chief Executive Officer shall report his or her findings to the Board.

Reports of alleged Reportable Activities may be submitted to the Audit Committee anonymously if the complainant so desires and no attempts will be made by the Company to identify the sender. Although anonymous reports may be submitted via any of the listed methods, reports submitted by e-mail tend to be less likely to remain anonymous than those submitted through the WS Platform or in writing. All reports of alleged Reportable Activities, whether or not they are submitted anonymously, will be kept in strict confidence to the extent possible, consistent with the Company's need to conduct an adequate investigation.

Reports of alleged Reportable Activities should be factual, rather than speculative, and should contain as much specific detail as possible to allow for proper assessment. The complainant describing an alleged Reportable Activity should be candid and should clearly set forth all of the information that the complainant knows regarding the Reportable Activity. In addition, the complaint should contain sufficient corroborating information to support the commencement of an investigation. The Company may, in its reasonable discretion, determine to commence an investigation if a complaint contains only unspecified or broad allegations of wrongdoing without appropriate factual support.

## **5. INVESTIGATIONS OF COMPLAINTS**

Upon receipt of a complaint alleging a Reportable Activity, the Audit Committee, or a designated trustee, will assess whether the report meets the basic conditions to commence an investigation, including (i) that it was submitted by an individual; (ii) that the report relates to a Reportable Activity; and (iii) that the reported information is not evidently false. If the report does not meet these conditions, it may be rejected. In such cases, the reporting person will be notified (via the WS platform, if applicable) with a brief explanation of the decision.

Where the report meets the necessary conditions, a confirmation of receipt will be issued (via the WS platform, if applicable). The Chair of the Audit Committee (or a designated trustee) will assess the content of the report and determine which internal unit or individual is best placed to investigate or address the Reportable Activity. Company Personnel subject to investigations pursuant to this Policy will be informed of the report (without disclosure of the reporting person's identity unless explicitly authorized or required by law) and be provided a reasonable timeframe for response to the investigation.

All investigations of Reportable Activities shall be carried out in a manner that ensures confidentiality of the matter and shall involve only those individuals who need to be involved in order to conduct the investigation. If requested by the complainant, the investigation shall be carried out in a manner to protect the anonymity of the complainant. Where it is deemed appropriate and legally permissible, the investigation can include, but is not limited to, discussions with the reporting person (unless the complaint was submitted on an anonymous basis), the Company Personnel against whom allegations have been made, and witnesses. The Audit Committee shall have the authority to obtain assistance from the Company's management, counsel or auditors, or to retain separate outside legal, accounting or other expertise as it deems necessary or desirable in order to conduct the investigation.

The Audit Committee shall notify the Board and the Chief Executive Officer, where necessary, following the receipt of any complaints submitted pursuant to this Policy. At each quarterly meeting of the Audit Committee, the Audit Committee will discuss the status of any ongoing investigations and review the resolution of each complaint submitted during the previous quarter, whether or not the complaint resulted in the commencement of a formal investigation.

Depending on the nature of the Reportable Activity and its materiality, and particularly with respect to accounting related complaints that could materially affect the financial statements of the Company or the integrity of the Company's system of internal controls, the person(s) designated to investigate the Reportable Activity will be instructed to keep each member of the Audit Committee (except to the extent a member of the Audit Committee is allegedly implicated in the Reportable Activity) apprised of the status of the investigation for purposes of ensuring compliance with regulatory requirements, including the timely and continuous disclosure of obligations of the Company and the certification obligations of the Chief Executive Officer and Chief Financial Officer of the Company.

During investigations, the Audit Committee (or designated trustee, where applicable) shall endeavor to act in a prudent and reasonable manner, with minimal disruption to the business and affairs of the Company and with sensitivity to the personal circumstances of the individual being investigated. An investigation of any matter brought to the Company's attention as a result of these procedures will not in any way be, or be deemed to be, a determination that any actions or inactions that are the subject of the report have in fact occurred or are improper.

## **6. CORRECTIVE ACTION**

The Audit Committee is ultimately responsible for determining the validity of each complaint and implementing the appropriate corrective action, with the input of its advisors and management, if requested. The Audit Committee shall report any legal or regulatory non-compliance to management

and ensure that management takes corrective action including, where appropriate, reporting any violation to relevant governmental authorities.

Any Company Personnel deemed to have committed a Reportable Activity may be subject to disciplinary actions up to and including termination.

## **7. PUBLICIZING THE PROCESS FOR REPORTING**

A copy of this Policy will be distributed to all Company Personnel. The Company will also periodically (at least annually) communicate reminders to Company Personnel of the process for reporting Reportable Activities. This may be accomplished by electronic or other means, including, for example, email, written memos and newsletters.

## **8. RETENTION OF COMPLAINTS AND DOCUMENTS**

All investigations of a Reportable Activity will be fully documented in writing by the person(s) designated to investigate the Reportable Activity. The Audit Committee shall retain all documents and records regarding any Reportable Activity for a period of no less than seven (7) years. Such documentation will be available for inspection by members of the Audit Committee, the external auditors and any external legal counsel of the Company and other advisors to the Company hired in connection with the investigation of the Reportable Activity. Disclosure of such documentation to any other person, and in particular any third party, will require the prior approval of the Chair of the Audit Committee to ensure that privilege of such documentation is properly maintained.

## **9. LOCAL LEGISLATION ADAPTATIONS**

Any subsidiary of the Company, whether located within the European Union ("EU") or outside of it, may implement a different procedure to accept, review, evaluate, or otherwise handle complaints or concerns, if such procedure is required under (i) Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law; (ii) any applicable legislation in force in the country where such subsidiary is located; or (iii) any other mandatory legal or regulatory requirements applicable in the relevant jurisdiction, including those outside the EU, governing the protection of whistleblowers or the handling of reported concerns.

Subsidiaries of the Company shall ensure compliance with the minimum standards required by applicable laws while maintaining alignment with this Policy.

## **10. REVIEW OF POLICY**

The Policy will be reviewed by the Audit Committee annually and updated as required. The Board may, from time to time, permit departures from the terms hereof, either prospectively or retrospectively, and no provision contained herein is intended to give rise to civil liability to Company Personnel, or to any other liability against the Company.

## 11. INQUIRIES

Any questions with respect to the general application of the Policy should be made to the Chair of the Audit Committee at [whistleblower@bragg.group](mailto:whistleblower@bragg.group).

This Whistleblower Policy was last reviewed on August 12, 2025.