





FOCUS ON SUSTAINABILITY IN OUR ENTIRE BUSINESS

– Opening remarks from the CEO

At NetEnt, our strategy is to grow in regulated markets. This naturally means a strong focus on sustainability throughout the business. In regulated markets, long-term business success depends on the ability to create an attractive customer offering that complies with all regulations and rules on our markets. At NetEnt we embrace more regulation in the gaming industry as we believe that this creates sustainability through a safe environment for both players and operators alike.

The sustainability of our business will be a key factor in ensuring that we can grow and create shareholder value for years to come. The NetEnt sustainability report is an annual communication about our progress and commitments in our efforts to always be a positive force for customers, players, employees and society at large. I hope you will enjoy reading this report and continue to follow the development of our company.

Therese Hillman,
CEO of NetEnt AB

SUSTAINABILITY AT NETENT

NetEnt is a leading provider of games and gaming systems used by gaming operators around the world. NetEnt's customers operate online casinos, and we work according to a partnership model, which means that NetEnt is responsible for all technical operations and monitoring of gaming transactions through hosting. The gaming operators pay a monthly royalty fee to NetEnt that is calculated as a percentage of the gaming revenues generated by NetEnt's games for the operator. Building a sustainable business with long-term growth is at the center of our vision to create the future of gaming. For us, this means to always strive to have the best customer and player offering and to be a good alternative by meeting the expectations and requirements of our stakeholders. In close dialogue with stakeholders, NetEnt has identified six sustainability areas that are of particular importance to the company and its stakeholders.

Governance

NetEnt has integrated sustainability efforts into the company's overall business strategy and operations. The guidelines for our sustainability framework have been reviewed and approved

by the Board of Directors. These guidelines are formulated in the company's CSR policy. NetEnt also introduced a code of conduct in 2019. The code lays down ethical guidelines for the company and clarifies the mutual expectations of both NetEnt and its employees.

At NetEnt, the main governance and supervisory body of sustainability is the Board of Directors. Senior management is responsible for the execution of the strategy and for ensuring that it is implemented throughout the organization. Our CSR Manager, together with managers in relevant departments, is responsible for making sure that our policies and standards are followed and that employees are aware of what is expected from them. NetEnt is also part of UN Global Compact and works to promote its ten principles in the communities and environments where the company conducts business. The company is also committed to supporting the UN's Global Sustainable Development Goals (SDGs), which place demands on continual improvements in the area of sustainability.

About this report

This sustainability report has been prepared in accordance with the

Global Reporting Initiative (GRI) standards, Core Option. GRI is a non-profit organization that publishes world-wide reporting standards for sustainability reporting. The Core Option of the GRI standards means that NetEnt will report on all GRI foundation disclosures, general disclosures and management approaches, while also reporting on a selected number of economic, environmental and social disclosure topics. The sustainability report covers activities in the 2019 calendar year, focusing on key issues and activities to address stakeholder concerns, in line with the materiality analysis. The report has not been subject to special review by the company's auditor.

Stakeholder consultations

To support a successful and sustainable development of NetEnt's business, both internal and external stakeholder engagement is a high priority. This occurs through a continuous dialogue throughout the year. Consulting our most important stakeholders, including customers, players, employees and shareholders, was a vital part in the preparation of this report.

Responsible gaming

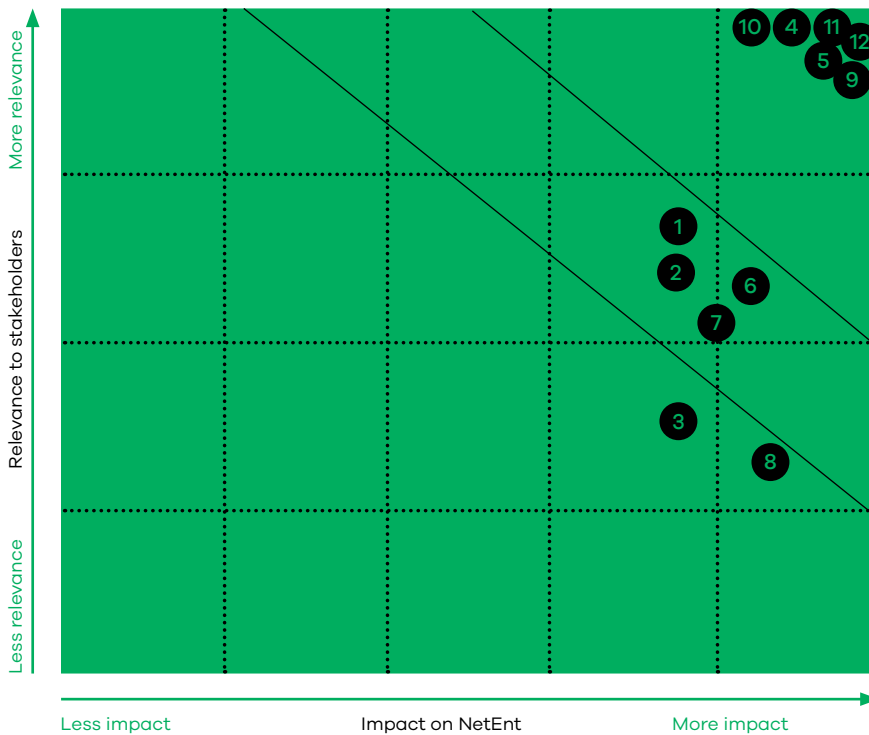
Sustainable regulation

Anti-corruption and anti-money laundering

Work environment and society

Diversity and inclusion

Environment



Evaluated focus areas

Environment

- 1. Carbon emissions
- 2. Business travel
- 3. Sustainable offices

Society

- 4. Responsible gaming
- 5. Regulated markets
- 6. Diversity and inclusion
- 7. Work environment and training
- 8. Community support

Governance

- 9. Anti-money laundering
- 10. Anti-corruption
- 11. Data protection and privacy
- 12. Cyber security

Most significant sustainability areas for each stakeholder group

Stakeholders	Material topics raised
Customers (and indirectly players)	<ul style="list-style-type: none"> • Responsible gaming • Cyber security • Consumer data protection
Employees	<ul style="list-style-type: none"> • Diversity and inclusion • Training and development for employees • Physical and mental health
Shareholders and investors	<ul style="list-style-type: none"> • Responsible gaming • Regulated markets • Anti-money laundering and anti-corruption
Society	<ul style="list-style-type: none"> • Responsible gaming • Regulated markets • Environmental issues • Anti-money laundering and anti-corruption • Diversity and inclusion • Employment opportunities • Taxes (primarily gaming tax, social security expenses, and corporate tax)
Suppliers	<ul style="list-style-type: none"> • Terms of employment

Materiality

After discussing materiality with our stakeholders, we reviewed and analyzed the information received and then selected the most relevant and important materiality topics that we would focus on in our sustainability work. The materiality matrix above is the result of this analytical work and shows our most material aspects, which are all covered in this report.

Responsible gaming

Promoting responsible gaming is fundamental to NetEnt and a prerequisite for retaining the licenses that we hold. It's important that NetEnt's games are played for the right reason, namely for entertainment and excitement. The vast majority of players enjoy gaming as a safe and responsible form of entertainment, but for some, gaming can turn into an addiction that threatens their physical, mental and social wellbeing. The Swedish Public Health Agency estimated most recently in 2018 that around three percent of all players active in the past year run the risk of

having issues with their gaming, while 0.6 percent can be classified as having a problem. Although NetEnt has no direct contact with individual players, the company works actively and in close cooperation with other market participants to prevent gaming-related problems.

All of NetEnt's data centers have ISO 27001 certification.

Information to players

In 2019, we published an information folder with a FAQ section as a first step in educating players on how gaming works mathematically and helping them to play responsibly.

Internal guidance and training

All NetEnt employees are trained in responsible gaming, and those with special responsibility undergo in-depth training. Formal guidance is provided by the company's CSR Policy. NetEnt also has the following policies and procedures which contribute to our commitments in this field:

- **NetEnt Self-Exclusion Procedure:** Description of how NetEnt shall proceed when a player expresses a desire to be prevented from playing further.
- **NetEnt Regulatory Training Policy:** Presentation of the requirements placed on employee training in responsible gaming (part of CSR policy and Compliance Management Policy).

Self-control and self-protection tools available in the NetEnt CasinoModule™.

Many of NetEnt's customers have their own tools and flagging systems to monitor problematic behavior among players. In addition, NetEnt offers a number of custom-made responsible gaming tools, such as

- **Play Limits.** NetEnt provides API functionality for setting game play limits, and support for the display of in-game messages when limits have been reached. In order for these limits to apply for all games that a player is exposed to in the casino, the limits must be implemented by the online casino operator to span between NetEnt and non-NetEnt products. NetEnt limits include overall loss and bet limits per session/day/week/month, session length, bet limit for a specific game and maximum single bet by game.
- **Reality checks.** When the NetEnt casino solution is configured, additional measures can be put in place to regularly remind players how long they have been playing and how much they have won or lost. The reality-check

100%

due diligence on all our new customers from a responsible gaming perspective

NetEnt has not suffered any complaints related to customer integrity and customer data from outside parties or regulatory bodies during the reporting period.

Sustainability targets

Responsible gaming:

Full compliance. Supervisory authorities conduct regular reviews. Outcome for 2019: No incidents to report.

Regulations and compliance:

Increase the share of revenue from locally regulated markets. Outcome for 2019: 48 percent.

Anti-corruption and anti-money laundering:

Full compliance. Supervisory authorities conduct regular reviews. Outcome for 2019: No incidents to report.

Diversity and inclusion:

Increase the share of female managers. Outcome for 2019: 31 percent.

Environment:

Reduce NetEnt's carbon footprint in relation to the number of gaming transactions. Outcome for 2019: 33.3 mg CO₂ per gaming transaction.

Work environment and society:

Keep the number of sick days low. Outcome for 2019: 1.7 percent.

feature displays a periodic in-game notification to real-money players during game play. Game play is suspended when the check is displayed and only resumed once the player has acknowledged the message. This functionality is enabled by default in most jurisdictions.

- **Game speed.** To make game play safer NetEnt's casino solution can be configured so that a certain amount of time (typically three seconds) must pass between two game rounds. This is also often a parameter that is regulated by gambling authorities in some markets.
- **Visible clock.** NetEnt's games feature support for time displays that make it easier for players to maintain a correct sense of time.

Sustainable regulation and compliance

Regulated markets

NetEnt welcomes regulation in the gaming industry because this leads to a safer environment for both players and gaming companies. Commercially reasonable rules regarding taxes and product specifics provide solid conditions for regulated markets to grow and develop. NetEnt's strategy is to expand in regulated markets and, for many years, the company has invested resources to build up an organization with the capacity to obtain and maintain licenses and certifications. NetEnt's games go through thousands of automated, repeated tests to ensure that they are compliant with all applicable rules and regulations. This means that the games must meet a number of responsible gaming criteria before they are considered ready for market launch. The compliance department at NetEnt supports the organization and the customers in matters regarding laws, regulations and directives, and ensures the company's compliance to policies and processes. The department also assists with customer due diligence. This is followed up by continuous due diligence controls of the existing customer base, with a frequency depending on their region of operation.

Ensuring game security, fairness and accreditation

NetEnt's platform and games, including the random number generators (RNG) used to generate the game outcomes, are tested and certified by independent accredited test facilities (ATF). They verify that the products meet all the required criteria, including player protection and fairness, as well as security for the regulated markets in which we operate.

NetEnt's games are tested and accredited by the following independent test facilities:

- eCOGRA
- Gambling Laboratories International
- iTech Labs
- Technical Services Bureau

Memberships in industry organizations

In Sweden, NetEnt is a member of the Swedish Online Gambling Association (BOS) and in the UK a member of the Remote Gambling Association (RGA). Both organizations represent gaming operators and their suppliers. NetEnt strives to contribute to the work of both organizations and to increase focus on responsible gaming issues. NetEnt is also an associate member of the World Lottery Association (WLA), which is a global organization that promotes state-authorized gambling operators and commits to the highest standards of corporate and social responsibility.

We support the communities where we operate

At NetEnt, we want to do as much as possible to support the communities in which we operate. We support organizations that work with the treatment, prevention and research of gambling addiction. In the UK, financial support is provided to the organizations GambleAware and GamCare.

Whistleblower function

For all employees to feel secure in reporting any deviations from the company policies and rules, a whistleblower function is in place to allow employees to raise their concerns in a confidential and efficient way.

Responsible company

We strive to be a responsible company. This means that we consider ourselves to have a social responsibility toward the societies in which we operate. We also have a responsibility to our shareholders and other interests to maintain a high level of business ethics in our operations.

NetEnt's overall sustainability work is integrated into its day-to-day operations and assured through policies, targets and KPIs within various parts of the organization.

Anti-corruption and anti-money laundering

NetEnt has a zero-tolerance stance and clear guidelines in relation to money laundering and corruption. Our Crime and Disorder Policy serves as a governance tool to reach the targets in this area. All of NetEnt's operations are evaluated in accordance with the EU's Fourth Anti-Money Laundering Directive that was adopted on June 26, 2017. According to this evaluation, we believe our company runs a relatively low risk for corruption since we conduct business with other companies that manage the actual monetary flows with the players. In addition, all employees participate in a training course in anti-corruption measures as part of the introduction program for new employees. Staff that have a high degree of interaction with customers undergo extra training in order to better identify any suspected cases and take appropriate measures. NetEnt's compliance team conducts a review of all new customers and considers in this review aspects related to anti-corruption and AML. In addition, existing customers are also reviewed regularly.

UN Global Compact

NetEnt is a supporting member of the UN Global Compact. The UN Global Compact aligns company strategies and operations with universal principles on human rights, labor, environment and anti-corruption and takes action that advances societal goals. This sustainability report also serves as our

We operate in many regulated markets

Licenses:

Alderney
Belgium
Gibraltar
Malta
USA (New Jersey, Pennsylvania)
UK
Romania
Spain

Certified games:

Bulgaria
Czech Republic
Denmark
Estonia
Finland
Isle of Man
Italy
Latvia
Lithuania
Mexico
Norway
Serbia

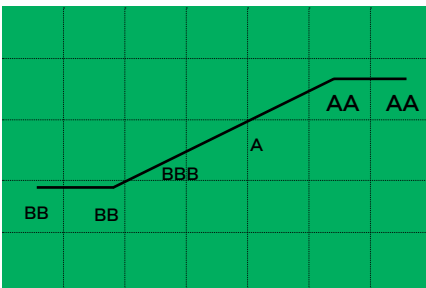
Our collaborations



ESG rating according to MSCI

In 2019, NetEnt's ESG rating of AA was reiterated by Morgan Stanley Capital International (MSCI). The MSCI rating is compiled using a thorough methodology to research and rate companies on a scale between "AAA" to "CCC" according to the risk exposure to industry-specific ESG risks and the ability to manage those risks relative to sector peers.

NetEnt's ESG rating from MSCI since 2014:



Oct 14 Aug 15 Aug 16 Aug 17 Sept 18 Dec 19



Zero tolerance regarding corruption and money laundering.

100%

of our employees receive responsible gambling training as part of their induction program.

yearly communication on progress (COP) to the United Nations' Global Compact review process.

UN Sustainable Development Goals

We continually assess our operations, materiality areas and areas where we can contribute to the 17 important sustainability goals adopted by the United Nations in 2015.

Whether it's our dedicated work on diversity and inclusion, our attention to minimize our carbon footprint or our policies when it comes to employee health and well-being, there are many ways in which we as a company can contribute to these important goals and will continue to do so in the future. Our CSR strategy, related activities, targets and programs are aligned with the SDGs.

We have also engaged with the United Nations Development Program (UNDP), who runs the task of communicating the goals, by supporting selected UNDP projects around the world.

Data Security

Privacy and information management is becoming increasingly important for large organizations that collect, process, and transfer information, such as confidential data about employees and customers, including personal data. The potential financial, legal, and reputational costs of a potential data breach have increased in recent years.

NetEnt takes individual integrity very seriously and works actively to protect personal data. The company is subject to data protection legislation in different parts of the world, primarily in the EU and the USA. NetEnt has introduced a data protection program as a strategic part of its efforts to maintain consistent data protection within all jurisdictions and for all customers (casino operators). Our privacy and information security policies and procedures are created to mitigate and minimize data-related vulnerabilities in general, and for personal data in particular.

At NetEnt, we monitor our systems 24 hours a day, year-round, and have

a special team for incident and crisis management that is ready to decide on potential incidents related to data intrusion. This handling sometimes includes escalation, reporting and corrective measures. All employees are trained during their introduction and on a regular basis thereafter.

NetEnt only processes personal data in connection with our performance under any service agreement: (1) only on behalf of and for the benefit of the customer; (2) in accordance with the service agreement and prior written instructions; and (3) as otherwise required by all applicable data-protection laws and regulations. NetEnt confirms not to process any personal data for any other purpose than specifically written instructions from the contractor. Personal data regarding players is always anonymised in NetEnt's systems and cannot be connected to a person unless the systems are cross-referenced with the casino operator.

Policies and assumptions

NetEnt has introduced several technical and organizational controls to meet the requirements set out in data protection legislation and gaming regulations with regard to collection, storage, use, transfer, protection or processing of personal data. NetEnt undertakes to not disclose personal data to authorities unless required by law.

Training of personnel

NetEnt trains all employees and consultants as part of the introductory on-boarding. The Chief Information Security Officer gives a monthly update and there is also yearly security training.

Responsibility distribution

NetEnt is present in many markets in which gambling is locally regulated, thus there is a detailed responsibility structure in the group. This includes specialist roles like legal and compliance. There are roles with responsibility for advising on best practices in privacy compliance and to develop policies, procedures, training, risk assessment, and monitoring programs.

Special measures

NetEnt applies “privacy-by-design” principles in the structure and implementation of systems and processes.

We regularly follow up on our integrity undertakings, including impact assessment and audits of internal systems and processes. External business partners must follow NetEnt’s policies and applicable legislature.

Regulating authorities and customers conduct regular inspections at NetEnt, often through external audit companies. NetEnt provides customers with all necessary documentation and information that is required to be able to conduct such audits.

Our employees

Happy employees contribute to a better society

In order for our company to be able to perform and achieve success, we need motivated employees who are happy at work. They should feel that their career development, health and participation in the company culture are taken seriously. We believe that this undertaking contributes to a better society in the countries and cities where we operate, which puts us one step closer to achieving the UN’s Sustainable Development Goals. We focus on three pillars in our approach to our employees:

- Health and energy.
- Diversity and inclusion.
- Career development and training.

Health and energy

Health and energy are an important part of NetEnt’s employee strategy. We encourage employees to have a healthy lifestyle with exercise, sound eating habits, and good mental health and balance in their lives. All NetEnt employees in the Swedish office are offered a yearly health benefit, which can be used to pay for a gym membership, for example. Our success is measured by our low number of sick days per employee, which in 2019 was 1.8 (2.4) percent.

The company has a staff policy (Employee Policy) to protect the health and well-being of its employees. The

policy covers areas such as work environment, alcohol, drugs and zero tolerance for harassment.

Diversity and inclusion

At NetEnt, diversity and inclusion are important to support better decision-making and more innovation as well as to contribute to an open and positive corporate culture. According to NetEnt’s staff policy, all employees shall have equal opportunities and rights to salary and benefits regardless of gender, age, disability, ethnicity, sexual orientation, and religion. Our employees represent more than 50 nationalities, and English is the official language of the group. All aspects of diversity and inclusion are integrated throughout the organization and the business processes at NetEnt.

Girls in Tech and Women in Technology

NetEnt works together with the organization Girls in Tech (GIT). Girls in Tech (GIT) is a global non-profit organization focused on the engagement, education and empowerment of girls and women who are passionate about technology. GIT aims to accelerate the growth of women entering into the tech industry. NetEnt also provides financial support to the organization Women in Technology in Poland, which works for a more inclusive environment for women in the technology industry.

Career development and training

Professional development is a strong focus at NetEnt. All employees are given the opportunity to grow and take on new roles in the company that match their strengths. Employees receive regular performance and career development reviews and have opportunities to continue learning through training and courses offered by the company. NetEnt maintains a continuous dialogue with its employees to gather feedback on key areas of importance and improvement potential for the company.

The following IT audits are conducted regularly by external parties

- Information security system.
- Live casino.
- Penetration testing.
- Vulnerability assessment.
- Payment card controls.
- Social engineering.



Environment

Our planet

NetEnt's digital business model is more environmentally friendly than traditional, land-based casino settings that consume more resources and have a higher carbon footprint. The largest negative environmental impact comes from electricity consumption, which is mainly attributed to technical equipment such as servers, PCs and monitors. Environmental issues are governed by NetEnt's CSR policy.

Travel

We invest in our office infrastructure to make sure that to the extent possible, we can avoid air travel in favor of video or phone meetings. This is not only good for the environment, but also an example of how environmental sustainability can support profitability in the company.

In 2019, NetEnt continued to limit air travel, and the primary software used for video conferences was utilized more than ever before.

Recycling

Wherever possible, we encourage all of our employees to recycle paper and plastic waste. Our office in Stockholm is now free of plastic cups, and we have instead opted for recyclable materials.

We also encourage the recycling of old computer hardware that has reached its end of life.

Sustainable offices

We strive to use sustainable buildings for our office space. In Stockholm, for example, our office is owned by Vasakronan. Vasakronan is goal-orientated in reducing environmental impact and is climate-neutral and certified according to ISO 14001.

NetEnt group's carbon dioxide emissions, tons of carbon dioxide equivalents (CO₂e)

	2019 ¹
Area 1 – facility operations	19
Area 2 – purchased electricity from the grid	878
Area 3 – indirect emissions, including travel	561
Total emissions in tons, CO₂e	1,458
Emissions in tons of CO ₂ per employee	1.84
Emissions in CO ₂ e per SEKm in revenue	0.84

NetEnt's carbon footprint

NetEnt has calculated the group's carbon emissions in accordance with the global standard for emissions accounting, which is called the GHG Protocol (Greenhouse Gas Protocol). An external party, Carbon Footprint Ltd., did the calculation. The largest causes of emissions in the operations are purchased electricity and air travel. In 2020, NetEnt will climate-compensate for these emissions and become climate neutral.

Doctors Without Borders

Instead of buying Christmas presents for staff members, NetEnt usually donates a corresponding sum to a charitable organization selected by the staff. For 2019, the staff chose Doctors Without Borders (Médecins Sans Frontières), an independent medical aid organization that provides life-saving medical care to people in need in vulnerable areas around the world. ●



¹ Estimated for the twelve-month period 10/1/2018–09/30/2019.

GRI INDEX CONTENT

The following tables contain standard information according to Global Reporting Initiative's (GRI) Core Option standard.

Core Option

GRI 102: General Disclosures

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Disclosure 102-2 Activities, brands, products and services	Annual Report pp. 8, 20	
Disclosure 102-3 Location of headquarters	Annual Report pp. 4, 20	
Disclosure 102-4 Location of operations	Annual Report pp. 4, 8, 9, 20	
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SUSTAINABILITY REPORT

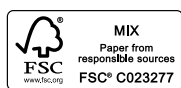
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	Disclosure 102-31 Review of economic, environmental and social topics	Annual Report pp. 40–41	UNGC Principle 1, 2, 3, 4, 5, 6, 7, 8, 9, 10
	Disclosure 102-32 Highest governance body's role in sustainability reporting	Annual Report p. 40	Approve the GRI report.
	Disclosure 102-33 Communicating critical concerns		Not applicable
	Disclosure 102-34 Nature and total number of concerns		Not applicable
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Specific Standard Disclosures

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Addresses

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