

Sportingbet Group Whistleblowing Policy

(the "Policy")

1. Introduction

We at Sportingbet are committed to high standards of corporate governance, honesty, openness and accountability. We also want to ensure that our dealings with each other, and our external suppliers and customers are of the same standards.

The Board of Directors of Sportingbet Plc also recognises that effective and honest communication is essential to maintain our business values and to ensure that instances of business malpractice and misconduct are detected and dealt with in the most appropriate manner.

The purpose of this Policy is to formalise Sportingbet's commitment to encourage everyone, whether they are full-time or part-time employees, agency staff, agents, contractors, suppliers or customers of Sportingbet Plc and its subsidiaries to report any genuine concerns regarding business misconduct without risk to themselves.

This Policy gives employees an internal procedure to report genuine concerns about work-related matters, reflecting the provisions of the Public Interest Disclosure Act 1998 ("PIDA"). PIDA sets out a legal framework for individuals to report concerns which are made in good faith in a protected environment provided the individual is making a protected disclosure.

2. What is a protected disclosure covered by the Whistleblowing policy?

You will make a protected disclosure if you reasonably believe the information you disclose shows one or more of the following:-

- *Criminal offences* - that a criminal offence has been committed, is being committed or is likely to be committed;
- *Failure to comply with legal obligations* - that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject;
- *Miscarriage of justice* - that a miscarriage of justice has occurred, is occurring or is likely to occur;
- *Endangering the health and safety of any person* - that the health or safety of any individual has been, is being or is likely to be endangered;
- *Actions which cause damage to the environment* - that the environment has been, is being or is likely to be damaged; and
- *Actions which are intended to deliberately conceal any of the above* - that information tending to show any matter falling within any one of the above has been, is being or is likely to be deliberately concealed.

It does not cover private grievances, nor does it cover issues that are more properly dealt with by another means, for example issues covering Equal Opportunities, Disciplinary, Performance Improvement and Health and Safety. For these, please contact the Group Head of Human Resources or, where appropriate, follow the relevant policies relating to progression of such concerns (e.g. the Grievance Policy).

There are examples in the Appendix to this Policy, but if you are in any doubt, please contact the Company Secretary of Sportingbet Plc. All contact details are at the end of this Policy.

3. How do I raise a concern?

It is important to note that we don't require you to have evidence before any genuine concern made in good faith is raised – we'd prefer you to raise the matter with us when it becomes a concern rather than wait for proof.

Step 1

We hope that you will feel able to raise any concerns first with your line manager. This may be done verbally, or in writing. We would ask that you state that it is a disclosure made under this policy.

Step 2

We fully understand that you may be unable to raise the matter with your manager, for whatever reason. In which case, you may raise the matter (once again, verbally or in writing) with the Company Secretary of Sportingbet Plc who is Sportingbet's Designated Officer for all whistle-blowing matters.

Step 3

Finally, if you feel that you cannot raise the matter with either your line manager or the Company Secretary of Sportingbet Plc, then you may raise the matter with the Chairman of the Audit Committee. You can also contact the Chairman of the Audit Committee if you think your concern has not been handled properly.

You can make a disclosure anonymously but this may make it difficult to investigate your concern properly or give feedback.

4. How will it be handled?

In each case, an allegation of misconduct or malpractice will be treated in the strictest of confidence and we will do all we can to keep your identity secret. As stated above you can raise your concerns anonymously but, please do bear in mind that it makes it more difficult for us to look into the matter and protect your position. That said, we will always consider all disclosures made under this Policy.

After you have raised your concerns, the person to whom the allegation has been made will make a record of its receipt. Please note that if you have a personal interest in the matter, we would ask that you tell us from the outset. Sportingbet will acknowledge receipt of your concern within 5 working days.

All concerns raised under this Policy will be reported formally to Sportingbet's Audit Committee, which is a Committee comprising non-executive members of the Sportingbet Plc Board of directors.

Step 1

Following receipt of a matter raised under this policy Sportingbet will then decide how to respond in a responsible and appropriate manner. Usually, in the first instance, this will involve undertaking a preliminary investigation.

Step 2

Following a preliminary investigation, Sportingbet will inform you, so far as is appropriate, of what further investigation (if any) is to be taken or you may be asked to discuss the disclosure in more detail.

Step 3

Once a preliminary or more detailed investigation is complete, it will be reviewed by Sportingbet's Audit Committee and it will be decided if the information disclosed requires further investigation and/or notification to an external body. The Designated Officer will, if practical and appropriate in the circumstances, inform you of the results of the investigation as well as any corrective actions that are being taken or why no further action will be taken. However, please be aware that whilst we will try

to give you as much feedback as possible at each stage of the process, we may not be able to give you specific details for reasons including that this could infringe upon the privacy of another individual.

5. Independent advice

If you are unsure whether to use this procedure, or want independent advice at any stage, you can contact the independent charity, Public Concern At Work.

It would not normally be appropriate to disclose your concerns to a third party outside Sportingbet Plc and its subsidiaries, unless you have first followed the procedure in this Policy. However, if for whatever reason you feel you cannot raise your concerns internally (or you are dissatisfied with the response having followed the internal process) and you honestly and reasonably believe the information and any allegations are true, you should consider raising the matter with the appropriate regulator who is within the Public Interest Disclosure prescribed persons Order 1999. A copy of this list is available on the HMSO website (www.hmsso.co.uk).

You should note that if you disregard these procedures, any disclosure to a third party may be in breach of the obligations of confidentiality contained in your contract of employment and you may not qualify for protection under the PIDA.

6. Your position if you speak out

If you genuinely believe that there is some form of malpractice of the nature set out at Point 2 above occurring at Sportingbet Plc or its subsidiaries and you raise your concerns in accordance with this Policy, Sportingbet will ensure you do not suffer any disadvantage in the workplace as a result of raising your concerns under this policy.

It may turn out that following our investigations, your concerns are unfounded. This doesn't mean you shouldn't have raised your concerns in the first place and this will not affect our policy of ensuring that you do not suffer a disadvantage as a result.

However, if someone raises a concern which they know to be false and or raises a concern in bad faith or out of malice, then the appropriate action (including disciplinary action) may be taken against them.

7. Confidentiality

Sportingbet will make every effort to keep your identity confidential if you make a disclosure and, wherever possible, will inform you if your identity has to be disclosed.

It is in the nature of complaints which may fall under this Policy that their content is likely to be sensitive and confidential. Sportingbet therefore emphasise that whilst clearly such matters do not limit your rights to make a genuine disclosure in accordance with the policy, this does not give you a general right to otherwise publish or disclose sensitive and confidential matters. Confidentiality and integrity of all confidential information and personal data (of Sportingbet Plc, its subsidiaries, officers, employees, contractors, suppliers etc) should be respected and maintained at all times.

8. Contact Details

Daniel Talisman
Company Secretary
Sportingbet Plc
4th Floor, 45 Moorfields
London EC2Y 9AE

+44 (0)20 7184 1841

Daniel.Talisman@Sportingbet.com

Chairman of the Audit Committee
rory@macnamara.net
07785773244

Public Concern at Work
Suite 301
16 Baldwins Gardens
London EC1N 7RJ
+44 (0)20 7404 6609

helpline@pcaw.co.uk

This Policy was updated and adopted by the Board 23rd January 2012

Appendix – Examples

Example one

You are working in an area which regularly engages outside contractors. You have noticed how the one which has been named Sportingbet's preferred supplier doesn't deliver on time or to budget. Your line manager, who is very friendly with one of the staff in the contracting firm, doesn't appear to share your concerns, but is quick to make excuses for them. Senior management seem to have accepted these explanations and don't seem to be concerned. You suspect your manager may be receiving inducements. What should you do?

Report the suspicion to the Company Secretary, under this Policy.

Example two

You start work at Sportingbet and it isn't long before you become aware that false claims for expenses are being made by certain people in your team. What should you do?

Report the incident immediately to your line manager, under this Policy. If the concern involves your line manager, or for any reason you would prefer them not to be told, you may raise the matter directly with the Company Secretary, or the Chairman of the Audit Committee.