

## **WHISTLEBLOWING POLICY SUMMARY**

The Stars Group has a zero tolerance for fraud and has taken numerous measures to deter, prevent, and detect fraud. One such measure is our Anti-Fraud Policy, which, among other things, (i) provides reporting procedures for suspected improper or questionable conduct, along with confidentiality guidelines; (ii) sets forth an investigative framework for any reports of suspected improper or questionable conduct; (iii) defines fraud and provides examples of its potential negative effects on us; (iv) articulates the responsibilities of our personnel; and (v) provides guidance on internal controls and offers illustrative examples of fraud. The Anti-Fraud Policy also sets forth our position that we do not permit or condone any retaliation against personnel who submit a report.