



WHISTLEBLOWER POLICY

1.0 Purpose

At Kabam, our players are at the heart of everything that we do - we win together, we play together, and we grow together. Kabam's ability to raise the bar in gaming could not be achieved without the integrity, value and ethical standards that comes from our people. Kabam supports a culture of lawful, ethical, and fair business practices and expects its employees to act with the utmost integrity at all times. Kabam is also committed to fostering a culture where our employees, partners, vendors, contractors, and stakeholders are encouraged to report concerns without fear of retaliation.

In keeping with this commitment, this policy ("Whistleblower Policy") establishes procedures that encourage and enable employees, contractors, partners, and stakeholders of Kabam to raise concerns so that we can investigate, address, and rectify any inappropriate conduct and provide reassurance that individuals will be protected from retaliation or reprisals as a result of such reporting.

2.0 Scope

This Policy applies to everyone who works at or represents Kabam including full-time employees, part-time employees, co-operative students, and contractors and to the extent applicable, external stakeholders including vendors and customers.

3.0 Reporting Concerns

If you have knowledge of, or reasonable good-faith grounds to suspect, wrongdoing related to Kabam, including a breach of policies, or legal or regulatory obligations, we encourage you to speak up. If you are an employee of Kabam, you are generally expected to notify your direct manager or a member of the People Team if you become aware of any violation of Kabam policies, or legal or regulatory requirements. However, certain types of wrongdoing due to the nature of the wrongdoing, or the individual carrying out the wrongdoing, may be inappropriate to report to your direct manager or a member of the People Team, such wrongdoings may include, but are not limited to:

- Financial malpractice, misrepresentations, impropriety, or fraud, including accounting and auditing or disclosure concerns;
- Breach of a legal or regulatory obligation;
- Risk or damage to the environment;
- Criminal activity;
- Bribery, facilitation of tax evasion or money laundering;
- Anti-competitive conduct;
- Breaches of sanctions;
- Violations of human rights, such as modern slavery and human trafficking;
- Theft, misuse, or infringement of intellectual property or violation of any intellectual property policy, practice, or license; and
- Attempts to cover up any of these behaviours,

(collectively, "Whistleblower Concerns").



Kabam has established a confidential external reporting system (“Ethics Hotline”) for both internal and external parties to report Whistleblower Concerns. The Ethics Hotline also provides an option for anonymous reporting. The Ethics Hotline is available anytime and provides options for reporting Whistleblower Concerns online at kabam.ethicspoint.com, and through the local, toll-free telephone numbers with multilingual services found in Appendix A of this Whistleblower Policy.

As stated above, general employment related concerns should continue to be reported through normal channels such as your direct manager or to a member of the People Team, and the Ethics Hotline should only be used to report Whistleblower Concerns.

3.1 Confidentiality

Kabam will treat all disclosures of suspected wrongdoing in a confidential and sensitive manner and maintain your privacy. Confidential means that your identity will be shared only with those who have a need to know in order to effectively conduct any investigation and follow up action (including, if necessary, disciplinary action) on your Whistleblower Concern, or where there is a legal requirement to share your identity.

When reporting a Whistleblower Concern (“Whistleblower Report”), we encourage you to share all the information you have relating to the Whistleblower Concern including any applicable evidence, as providing sufficient details will help Kabam conduct a thorough and effective investigation. You should only disclose information that is relevant to the Whistleblower Concern and avoid providing information not relevant to the Whistleblower Concern.

3.2 Anonymous Reporting

Kabam encourages parties to include their name when making Whistleblower Reports; however, reports may be made on an anonymous basis through the Ethics Hotline. If you make an anonymous Whistleblower Report, keep in mind that it may be more difficult to investigate an anonymous concern due to difficulty in obtaining specific details and/or answers to follow up questions.

4.0 Report Process

Kabam takes all Whistleblower Reports seriously. All Whistleblower Reports reported through the Ethics Hotline are promptly brought to the attention of the individuals described below (each a “Recipient”), depending on the subject of the Whistleblower Report.

Subject of Whistleblower Report	Recipient of Whistleblower Report
Member of the C-Suite*	External Legal Counsel
Member of People Team	Chief Financial Officer (“CFO”)
Any employee not described above	Chief People Officer (“CPO”)

**Chief Executive Officer, Chief Financial Officer, Chief People Officer, Chief Studios Officer*

The Recipient will acknowledge receipt of the Whistleblower Report within 5 business days and provide the individual who made the Whistleblower Report (the “Reporter”) with updates as appropriate given the nature and complexity of the Whistleblower Concern. The Recipient will investigate all Whistleblower Reports and will take action as appropriate, depending on the validity, nature, and severity of the Whistleblower Concern. Whistleblower Reports will be shared with internal and external individuals as necessary to conduct an investigation and take follow up action. If a Reporter would like to amend or withdraw its Whistleblower Report, the Reporter should contact the CPO or the Ethics Hotline.



The CPO will provide a quarterly report to the Kabam Board of Directors providing an overview of any Whistleblower Reports received; however a Recipient may escalate Whistleblower Reports to the entire Board, or to a select Netmarble Corporation member of the Board, upon receipt, depending on the severity and nature of the Whistleblower Report.

5.0 Reporter Protection

Kabam will not tolerate any retaliation, including but not limited to harassment, retaliation, victimization, or adverse employment consequences, against an individual for raising a good-faith and genuine Whistleblower Concern within Kabam or for participating in the investigation of any Whistleblower Concern. Any person who retaliates against an individual for raising a Whistleblower Concern, threatens any such retaliation, or is involved in any such conduct may be subject to disciplinary action, up to and including termination of employment or contractual relationship with Kabam.

Any person who experiences or believes they have been subjected to any form of adverse consequences as a result of submitting a Whistleblower Concern, or participating in an investigation, should document the details and immediately raise their concern to the CPO or online at kabam.ethicspoint.com, or through one of the local, toll-free numbers found in Appendix A of this Whistleblower Policy.

All Whistleblower Reports should be made in good faith. If a Whistleblower Report is found to be made in bad faith or with malicious intent, disciplinary action may be taken against the Reporter, up to and including termination.

6.0 Communication of Policy

All new employees, must acknowledge this WhistleBlower Policy, and annually all employees must certify an acknowledgement of this Whistleblower Policy. A copy of this WhistleBlower Policy will be available on Kabam's Employee Hub and information on how external stakeholders, including vendors and customers, may report WhistleBlower Concerns is available at the following locations:

- Kabam's Terms of Service; and
- Kabam's Vendor Onboarding Package.

This Whistleblower Policy will be reviewed at least once every two years by the CPO and CEO and amended as appropriate.

Reviewed and Approved by the CEO and CPO on September 25, 2023.

Appendix A



Toll-free Ethics Hotline Numbers:

Canada: 1-844-539-2263

United States of America: 1-844-539-2263

Korea:

Korea (Sejong Telecom) 00-309-11

Korea (LGU+) 00-369-11

Korea (KT) 00-729-11

Korea (U.S. Military Bases - Sejong Telecom) 550-2872

Korea (U.S. Military Bases - KT) 550-4663

At the English prompt dial 844-539-2263.