

Declaration of conformity of the Management Board and Supervisory Board of bet-at-home.com AG with the German Corporate Governance Code in accordance with Section 161 AktG

Section 161 of the German Companies Act [AktG] obliges the Management Board and the Supervisory Board of listed companies to declare annually, that the recommendations of the “Government Commission on the German Corporate Governance Code” (“**Code**”) published by the Federal Ministry of Justice in the official section of the Federal Gazette, have been and will be complied with, or which recommendations have not been or are not being applied and why not. The declaration according to Section 161 AktG, the so-called “**declaration of conformity**”, must be made permanently accessible to the shareholders.

Insofar as it is related to the past, this Declaration of Conformity refers to the recommendations of the “Government Commission on the German Corporate Governance Code” as of December 16, 2019. As far as it is related to the future, this Declaration of Conformity refers to the recommendations in the version of the Code as of April 28, 2022.

The Management Board and Supervisory Board of bet-at-home.com AG hereby declare, that:

1. bet-at-home.com AG has complied with the recommendations of the Code in the version stated therein since the issuance of the last Declaration of Conformity in December 2021, with certain exceptions explained therein.
2. In the future, the recommendations of the Code will be complied with the following exceptions:

Formation of committees of the Supervisory Board

According to the articles of association, the company’s Supervisory Board is composed of three members. With this size, the formation of committees does not appear necessary or sensible, since the conceivable tasks of committees can be performed just as effectively and competently by the entire Supervisory Board (D.2).

Structure of the remuneration of the Management Board

Taking the respective tax burden into consideration, variable remuneration amounts of Management Board members shall be invested predominantly in company shares by the respective Management Board member, or shall be granted as share-based remuneration (G.10). According to the company’s Management Board compensation system, approved by the Annual General Meeting held on May 17, 2022 (“Compensation System”), both the short-term and the long-term variable compensation of the Management Board are not share-based and do not provide for an obligation to invest compensation amounts in company shares. Instead, the long-term variable compensation of the Board of Management is based on the multi-year development of the Group’s EBITDA. The long-term variable compensation of the Board of Management

linked to the long-term targets represents an effective incentive, which is in conformity with the interests of shareholders, as it would be the case with a share-based compensation.

Structure of the remuneration of the Supervisory Board

Compensation of the members of the Supervisory Board includes the position of chairman but not that of deputy chairman. Nor does there appear to be a need to differentiate between a deputy chairman and ordinary members, as the participation of all members is required for resolutions in the Supervisory Board of three people, so that cases where the chairman is represented by the deputy rarely occur in practice (G.17).

Düsseldorf, December 2022