



CODE OF CONDUCT

Conflicts of Interest

Directors and Officers of the Jumbo Interactive Limited ('the Company') must act in the best interests of the Company as a whole. Directors and Officers shall engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.

Corporate Opportunities

Directors and Officers must not take advantage of their position or information acquired, in the course of their duties, or misuse information for personal gain or to cause detriment to the Company.

Confidentiality

Confidential information received in the course of the exercise of a Director's or Officer's duties remains the property of the Company and it is improper to disclose it, or allow it to be disclosed, unless that disclosure has been authorized by the Chairman of the Board with consideration to the persons concerned, or as required by law.

Fair Dealing

Directors and Officers shall act honestly and with integrity in all of their dealings with employees, suppliers, customers and competitors such that the best interests and reputation of the Company are maintained and enhanced.

Protection of Assets

Directors and Officers must use their best endeavours to protect the Company's assets and ensure that those assets are used for business purposes only.

Compliance with Laws & Regulations

Directors and Officers have an obligation, at all times, to comply with the spirit, as well as the letter, of the law, including any applicable rules and regulations.

Promotion of Ethical & Lawful Behaviour

Directors and Officers should at all times strongly encourage legal and ethical behaviour. If a Director or Officer becomes aware of unlawful or unethical behaviour by anyone in the Company then he is obliged to report such activities to the Chairman. Information provided should be treated in a discrete and confidential fashion and the matters dealt with expeditiously.