

SUPPLIER CODE OF CONDUCT

Approved by the Board of Directors

Table of contents

1 Goal2

2 Recipients3

3 Diversity and inclusiveness3

4 Professional ethics and regulatory compliance3

5 Compliance with the Anti-corruption regulations5

6 Human rights and working conditions5

7 Environmental regulations and protection6

8 Health and safety7

9 Confidential and proprietary information7

10 Compliance with this Supplier Code of Conduct.....7

11 Reporting.....7

REVISION	REASON / REVISION CHANGES	DATE
Rev. 1	First issue	13 th May 2022
Rev. 2	Update	27 th July 2023

1 Goal

Lottomatica and its affiliates are committed to maintaining the most rigorous environmental and commercial ethical standards, and encourage the entire supply chain to implement the same approaches and policies, in compliance with the national tax fraud, anti-corruption, and anti-money laundering legislation, while at the same time promoting the goals of the 2030 Agenda. Within this context, in order to regulate relations with its suppliers, Lottomatica Group has already adopted specific monitoring tools, such as the Code of Ethics, the Organisation, Management and Control Model pursuant to Italian Legislative Decree no. 231/01, and the Anti-corruption Policy. In this regard, our Suppliers are selected and evaluated based on specific criteria, which are not limited to economic parameters alone. Our Suppliers must also scrupulously comply with all the applicable laws, as well as the international environmental social and governance standards. Our commitment to these standards of excellence includes strict compliance with the principles of ethical responsibility, the applicable legislation, human rights, working conditions, environmental regulations and protection, responsible procurement of mineral sources, health and safety, and proprietary and confidential information.

The same Suppliers must implement the same practices internally, within their subcontracting chains.

The expectations described in this Supplier Code of Conduct are essential to our decision to enter into a partnership or to extend an existing partnership. Each Supplier, under its full and exclusive responsibility, warrants that all of its employees, representatives, and subcontractors fully understand and comply with these guidelines. The expectations set out in the Supplier Code of Conduct are not intended to replace, but rather to supplement, the specific contractual conditions. If a contractual condition is more stringent than the terms set out in this Supplier Code of Conduct, the Supplier shall be required to comply with the more stringent provision.

2 Recipients

This Supplier Code of Conduct describes our expectations regarding the standards and practices to be respected at the workplace by our Suppliers, as well as by their parent companies, subsidiaries, affiliates, and subcontractors, and all other entities that are part of their supply chain.

3 Diversity and inclusiveness

Lottomatica offers equal contractual opportunities that are not in any way influenced religion, gender, sexual orientation, gender identity or expression, pregnancy, marital status, nationality, ethnicity, citizenship, ancestry, physical or mental disability, medical condition, genetic information, or any other status protected under the applicable local, state, or federal legislation, and encourages its Suppliers to do the same.

4 Professional ethics and regulatory compliance

All Lottomatica Suppliers must conduct their business and manage their work relationships with integrity, and must strictly comply with all the rules and regulations relating to active or passive corruption, money laundering, financing of terrorist activities, and prohibited commercial practices.

- **Antitrust:** the Suppliers must conduct their business activities in full compliance with the antitrust legislation, and according to the principles of fair competition.
- **Whistleblower protection:** the Suppliers must guarantee the protection of any employees who report irregularities, by setting up a system that will allow all workers to report irregularities in an entirely anonymous manner.
- **Global trade:** the Suppliers must comply with all the applicable laws and regulations governing the import, export, and re-export of goods.
- **Compliance with the global anti-money laundering regulations:** the Suppliers represent and warrant that they will comply with all anti-money laundering regulations, both directly and in the person of their managers, directors, employees, and/or agents.

- **Compliance with the global anti-corruption regulations:** The Suppliers undertake not to engage in any corruptive practices, illegitimate favours, collusive behaviour, or solicitations, either directly and/or through any third parties, in order to obtain personal and business-related advantages for themselves or for others. It is never permitted to pay or to offer payments, material benefits, or advantages of any other nature to any third party, either directly or indirectly, in order to influence or remunerate an official duty. The Suppliers represent and undertake to comply with all the anti-corruption laws, both directly and in the person of their representatives.
- **Compliance with the global regulations on tax evasion:** the Suppliers undertake not to engage in any activity, conduct, or practice that could constitute a crime under the current legislation concerning tax evasion, or aiding and abetting tax evasion, or any offence equivalent to tax evasion or the aiding and abetting thereof, on the part of Lottomatica or its Supplier in another country. The Suppliers represent and undertake to comply with all laws relating to the prevention of tax evasion, including those concerning the aiding and abetting of tax evasion, both directly and in the person of their representatives.
- **Media:** the Suppliers are not authorised to speak to the press or the media on Lottomatica's behalf, unless they have been expressly authorised to do so in writing.
- **Company courtesies:** the Suppliers must refrain from offering and items of value gifts to Lottomatica employees for the purpose of obtaining or securing benefits or profits, or otherwise offering anything that could give the impression of influencing, compromising the impartiality of, or imposing conditions upon Lottomatica employees, whether directly or through third parties. If any gifts, meals, or forms of entertainment are good judgement, discretion, and moderation should always be used.
- **Conflicts of interest:** the Suppliers must avoid engaging in inappropriate conduct, giving rise to conflict of interest situations, or any behaviour that could give the impression thereof. The Suppliers must not provoke any conflicts of interest for Lottomatica employees, and must avoid any situations that could pose risks in this regard.
- **Privileged information:** if a Supplier should become aware of privileged and/or relevant information that is not in the public domain during his/her period of service at Lottomatica, he/she shall be obliged not to share such information with anyone or to use it for financial transactions.

- **Business Continuity:** the Suppliers must be prepared to respond to any disruption to their business activities (e.g. natural disasters, terrorist activities, computer viruses, diseases, pandemics, infectious diseases, etc.). In particular, the term preparation is to be understood as the preparation of emergency plans aimed at protecting both the employees and the environment from the effects of potential emergencies, within the context of the operational activities, as much as possible.

5 Compliance with the Anti-corruption regulations

The Suppliers represent and warrant that they will comply with all the global anti-corruption regulations, both directly and in the person of their managers, directors, employees, and/or agents.

Within the context of the principles set out in the Code of Ethics and the Anti-Corruption Policy, the Suppliers are prohibited from engaging in any form of corruption and illegal conduct, and must ensure that any payments, gifts or other commitments in relation to third parties are made in full compliance with the current anti-corruption laws;

In particular, the Supplier is required to:

- Establish a documented anti-corruption policy
- Appoint an anti-corruption officer

6 Human rights and working conditions

Lottomatica expects its Suppliers to share its commitment to promoting and respecting human rights, and guaranteeing the principle of equal opportunity at the workplace. We expect all our Suppliers to adopt labour practices that are consistent with all the applicable laws and regulations, with particular attention to the following aspects, by way of example:

- **Child Labour:** the Suppliers must not assign work activities to children under 15 years of age. If the national laws or regulations allow minors 13 to 15 years of age to carry out less demanding work activities, this opportunity will nevertheless be prohibited if it prevents the minor from attending compulsory school or compulsory training courses, or if the working conditions put the child's health or development at risk.

- **Forced Labour and modern slavery:** the Suppliers must ensure that they do not participate in, or make use of, any form of forced labour.
- **Non-discrimination:** the Suppliers must undertake and implement measures aimed at combating any form of discrimination based on gender, age, disability, ethnicity, societal and geographical origins, trade union membership, language, religion, political or sexual orientation, gender identity, nationality, or marital status.
- **Fair and favorable working conditions:** the Suppliers must ensure a workplace free of harassment, harsh treatment, violence, intimidation, corporal punishment, physical or mental coercion, verbal abuse and/or discrimination. We also expect them to guarantee fair remuneration and adequate to minimum living standards consistent with the minimum living wage requirements set out in the collective labor agreements and the applicable legislation in particular in compliance with the ILO Declaration, and to promote active policies aimed at preventing and combating the gender gap and fostering the recruitment of people with disabilities.
- **Diversity and inclusiveness:** the Suppliers must promote a commitment to economic inclusiveness and diversity, where relevant, and must certify and monitor its expenditures dedicated to diversity initiatives wherever possible.
- **Working hours and wage policies:** the Suppliers must comply with all the applicable national laws and regulations regarding working hours, remuneration, and allowances, guaranteeing a maximum working time of 8 hours per day for a total of 40 hours per week in accordance with the requirements of collective agreements and in compliance with the ILO Declaration.
- **Freedom of association and collective bargaining:** the Suppliers must guarantee freedom of association and collective bargaining for their employees, in accordance with the applicable laws and regulations.

7 Environmental regulations and protection

The Suppliers must comply with all the applicable environmental laws, regulations and standards, and must implement an effective system for identifying and eliminating any potential environmental risks. The Suppliers must strive to continuously improve their own environmental management systems and environmental performance. The Suppliers must uphold the principles of recycling, reuse, and reducing consumption. They must also commit to reducing their consumption of energy and other resources, and reducing the waste and emissions that they produce. They must also constantly increase their use of renewable energy sources.

8 Health and safety

The Suppliers must guarantee safe, suitable, and hygienic work facilities and resources for their employees. The Suppliers must adopt effective health, accident prevention, and remediation policies and procedures that are consistent with all the national and international laws, and industry regulations. The Suppliers must provide their employees, suppliers and subcontractors with all the protective equipment and training necessary to carry out their duties in complete safety.

9 Confidential and proprietary information

Lottomatica's Suppliers must ensure the protection of all sensitive information, including confidential and protected personal information, which may only be used for professional purposes. The Suppliers must adopt appropriate security systems and mechanisms for all information subject to electronic communication, and must notify Lottomatica of any suspected or verified data breaches. Lottomatica also expects its Suppliers to protect Lottomatica's personally identifiable information against unauthorised access, destruction, modification, use and/or disclosure.

10 Compliance with this Supplier Code of Conduct

In the event of a violation of the Supplier Code of Conduct, Lottomatica will promptly terminate its relationship with the Supplier.

11 Reporting

Any recipients who should become aware of any violations of this Code of Conduct are encouraged by Lottomatica Group to submit a report. For more information on the reporting channels available, please refer to the following web page

<https://lottomaticagroup.com/Home/Pagine/Gruppo/Gruppo-Sottopagine/Governance/Sottopagine/Procedura-Whistleblowing?lang=it-IT>