

LOTTOMATIC
GROUP
TAX STRATEGY

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INDEX

1. INTRODUCTION
2. OBJECTIVES
3. PRINCIPLES
4. GUIDELINES FOR IMPLEMENTING THE TAX STRATEGY
5. ADOPTION, PUBLICATION, VALIDITY AND UPDATING

1. INTRODUCTION

This Tax Strategy originates from the Code of Ethics and defines the objectives and commitments of the Lottomatica Group (also referred to as "Lottomatica" or "the Group") in ensuring sound, sustainable and prudent management of tax matters. The guidelines for implementing the Tax Strategy, like those of the Code of Ethics, form an essential part of the contractual obligations of personnel. Compliance with this document, in guiding the actions of employees and collaborators, is a determining factor in protecting the image, reputation and other distinctive features of the Group.

Consequently, violations or non-compliance with the Tax Strategy may lead to the adoption of measures against the recipients, in accordance with the provisions of the Group's penalty system.

This Tax Strategy also complies with the principles and duties set out in Ministerial Decree dated April 29th 2024 for taxpayers admitted to the collaborative compliance regime referred to in Legislative Decree 128/2015 and represents the first element of the tax risk detection, measurement, management and control system ("Tax Control Framework" or "TCF") integrated into the internal control and corporate risk management system adopted by the Lottomatica Group.

2. OBJECTIVES

The Lottomatica Group, in accordance with its management decisions and in line with its sustainability policy, intends to pursue a tax strategy based on principles of honesty, fairness and compliance with tax regulations, characterised by collaborative and transparent behaviour, in order to minimise any substantial impact in terms of tax or reputational risk.

To this end, the Group's tax strategy pursues the following objectives:

- contain tax risk, understood as the risk of operating in violation of regulations, including tax regulations, or abusing the principles and purposes of the tax system, with the consequent financial and reputational effects;
- fulfilling tax obligations and paying taxes in a timely and transparent manner, adopting a prudent approach in order to manage tax risk responsibly, ensuring the correct and timely determination and payment of taxes due by law and the fulfilment of related obligations under tax legislation;
- manage its operations with the utmost transparency and fairness, including for the purposes of determining income and, more generally, taxation as a whole.

3. PRINCIPLES

The Group operates in accordance with the following principles of conduct in tax matters. The principles listed below are pursued through appropriate corporate *governance* systems.

1.1. COMPLIANCE WITH LAWS AND REGULATIONS

The Group pursues a policy of compliance with the regulations in force in the countries in which it operates, applying tax legislation through conduct inspired by compliance with and respect for applicable tax regulations, interpreted with a view to managing tax risk responsibly, including in the context of ESG risks and impacts.

1.2. VALUE CREATION

As a *leading* operator in the legal gaming market authorised by the Customs and Monopolies Agency, the Group plays a key role in achieving important public interest objectives thanks to its contribution to tax revenues. Aware that tax revenues are one of the main sources of contribution to the development of the economic and social fabric, the Group pursues the primary interest of creating value for its *stakeholders* in the long term by interpreting and applying tax regulations, taking care to pay the taxes due by law.

1.3. SUSTAINABILITY

Recognising the fundamental importance of the context in which it operates for its ability to create value and competitiveness, the Group gives back to the communities where it operates, fairly and responsibly, through taxes, a share of the value created.

1.4. TRANSPARENCY

The Group establishes and maintains a relationship with the tax authorities based on maximum transparency and cooperation, good faith and trust, so as to be recognised as a credible and reliable counterpart. It is the Group's objective to provide the necessary information in its financial and non-financial documentation so that its approach to taxation and its actual tax burden can be communicated in a transparent manner.

4. GUIDELINES FOR IMPLEMENTING THE TAX STRATEGY

In order to ensure the effective implementation of the above principles and pursue the above objectives, the Group adopts the following guidelines:

4.1. CORRECT APPLICATION OF TAX LEGISLATION

In order to comply with and implement the objectives relating to variable tax management, the Group undertakes to operate in accordance with the tax regulations of the various jurisdictions in which it operates, implementing corporate actions that are consistent with both the literal meaning of the various applicable regulations and the *rationale* underlying them. Consequently, the Group monitors and oversees relevant regulatory changes in tax matters. In cases where tax legislation is not sufficiently clear or unambiguous in its meaning, the Group pursues a reasonable interpretation of it, drawing on the services of external professionals where necessary. Where there is still uncertainty regarding the interpretation of tax regulations, the Group acts with prudence and full transparency towards the tax authorities, working with them, where possible, to achieve the most appropriate application of the regulations, using all the tools made available by the tax system.

4.2. INTERNAL CONTROL AND RISK MANAGEMENT SYSTEM

In pursuit of its objectives of protecting its assets, managing the company according to criteria of effectiveness and efficiency, and ensuring the reliability of accounting information, including tax information, the Group maintains an "Internal Control and Risk Management System" (SCIGR) consisting of a set of rules, procedures and organisational structures designed to enable the identification, measurement, management and monitoring of the main business risks.

The Group has implemented a group tax risk control and management system ("Tax Control Framework" or "TCF"), integrated into the corporate SCIGR, in line with the OECD guidelines, as implemented by the Italian Revenue Agency. The Group's TCF is implemented through *governance* documents that clearly assign the relevant roles and responsibilities in the management of tax variables, ensuring adequate compliance with the principles of "*segregation of duties*" and "*decision-making escalation*", up to the involvement of senior management and corporate bodies on tax issues of greater impact and complexity.

At least once a year, the Group's respective corporate bodies receive adequate information on the functioning of the tax control and management system, demonstrating effective consistency with the principles set out in this document.

4.3. AGGRESSIVE TAX PLANNING

The Group does not carry out domestic or cross-border transactions that do not reflect economic reality, with the sole purpose of obtaining a tax advantage without valid commercial reasons, or "artificial" transactions carried out for the sole purpose of reducing the tax burden. Similarly, the Group does not engage in conduct that conflicts with the purpose or spirit of the relevant tax provisions or regulations, or that generates double deduction, deduction/non-inclusion or double non-taxation, including as a result of asymmetries between the tax systems of any jurisdictions involved.

Furthermore, the Group:

- in pursuing adequate tax burden management, makes use of tax incentives generally applicable to the type of activity carried out, in compliance with specific regulations and only where these incentives are in line with the

economic substance of the activity carried out;

- structures *intercompany* relationships in the countries in which it operates at market conditions and prices, in accordance with the laws and OECD guidelines in force at the time, adopting a methodology in line with *the arm's length principle*, as referred to in the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations;
- does not make acquisitions or investments in states or countries with privileged tax regimes (*i.e. tax havens, low tax jurisdictions or non-cooperative jurisdictions for tax purposes*) nor does it carry out commercial transactions with entities located therein, except where such acquisitions, investments and commercial transactions are functional to the company's commercial purposes and are aimed at developing business activities falling within the scope of the corporate purpose, as well as being characterised by objective reasons of convenience and economic opportunity;
- it refrains from conduct that is prejudicial to the integrity, autonomy or image of the Group, doing whatever is necessary to prevent the organisation from being involved in tax fraud, including as a result of conduct by third parties, such as individuals, companies or entities of any kind linked to the Group by employment, collaboration, commercial or other relationships.

Finally, the Group prepares Country-by-Country Reports, giving concrete effect to the commitments made in this document to manage tax risk in a low-risk manner.

4.4. COOPERATION WITH THE TAX AUTHORITIES

Relations with the tax authorities are managed in such a way as not to compromise the integrity and reputation of the Group, and are based on the utmost fairness, transparency, honesty, integrity and cooperation. In order to avoid any actions that may contravene tax regulations or otherwise damage the company's image and integrity, the Group is committed to ensuring the utmost fairness, clarity and transparency in the preparation of all deeds, documents, communications or computerised records, ensuring that they are based on truthful and objective data.

With a view to consolidating transparency towards the Italian tax authorities, the Group promotes the adherence of the Parent Company and the main companies within the scope of the TCF to the Collaborative Compliance regime, introduced by Legislative Decree No. 128 of 5 August 2015, in order to achieve stronger relations between the tax authorities and taxpayers. Within the context of this regime, the Group undertakes to use the communication tools made available to it in a manner consistent with the basic principles of the regime, refraining from systematically disregarding the instructions provided by the tax authorities.

4.5. AGREE TO DISAGREE

In the event of tax disputes, the Group seeks to resolve them in agreement with the tax authorities and only resorts to litigation when it is strongly convinced of its position and supported by reasoned opinions expressed by external consultants. To protect the interests of the company and its shareholders, the Group considers it legitimate to support a reasonable interpretation of tax regulations where there are differences of interpretation with the tax authorities.

4.6. SOFT CONTROLS

The Board of Directors of the Parent Company, as the Group's governing body, has the role and responsibility of guiding the dissemination of a corporate culture based on the values defined in this document, delegating this task to the tax department and administrative bodies of the subsidiaries.

The parent company's tax function, equipped with adequate material and organisational resources, oversees and manages the application of tax regulations and provides advice, guidance and control to all subsidiaries belonging to the Group, also guaranteeing assistance and support for control activities initiated by the tax authorities.

The Group promotes the dissemination of the culture and values of tax *compliance* by organising training initiatives for all staff, including those not involved in the tax function of individual entities.

Finally, the Group requires its *top management* to maintain an approach consistent with the principles set out in the Code of Ethics and in this document, pursuing sustainable economic and financial results. To this end, as part of its remuneration policies, the Group does not provide for incentive mechanisms linked to the achievement of tax reduction objectives, which could push *management* to make unethical choices or choices that conflict with the Code of Ethics and this document.

4.7. REPORTING VIOLATIONS

In line with the *Whistleblowing* procedure adopted, the Group provides employees, members of corporate bodies and third parties with specific channels for reporting illegal conduct under tax legislation that may be relevant for the purposes of the administrative liability of entities pursuant to Legislative Decree 231/2001.

5. ADOPTION, PUBLICATION, VALIDITY AND UPDATING

The Tax Strategy is approved by the Board of Directors of Lottomatica Group S.p.A., as the parent company which is responsible for ensuring its application, including in the exercise of its management and coordination activities with regard to its subsidiaries. The Board of Directors of the subsidiaries is required, by means of a specific resolution, to implement the Tax Strategy, thereby assuming responsibility for ensuring awareness and application of the same, together with the specific task of disseminating the culture and values underlying it.

This Tax Strategy shall come into force on the first day following the date on which it is approved by the Board of Directors of Lottomatica Group S.p.A. and shall be communicated and made available through publication on the Group's website <https://lottomaticagroup.com>.

Its interpretation is entrusted to the Group's tax department, which also reviews and updates it by submitting appropriate proposals to the competent body.

