

COMPLIANCE POLICY

Lottomatica Group SpA

Approved by the Board of Directors of Lottomatica Group S.p.A.
on 02/03/2026

LOTTOMatica



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1. PREMISE AND CONTEXT

The **Lottomatica Group** (hereinafter also “*Lottomatica*”, “*Group*” or “*Company*”) is the **first Italian operator in the legal gaming market** authorised by the ADM and **one of the major players at European level**.

The Group operates in the following sectors: **Online** (sports betting and online gaming); **Betting** (sports betting and land-based gaming); **Gaming** (amusement and entertainment machines).

Aiming to be the partner of choice for the industry’s leading players, Lottomatica makes all its strategic assets available to foster development and contribute to the sustainable growth of the entire sector. Through its channels, the Company is committed to offering customers engaging, responsible, and high-quality entertainment experience, in safe and welcoming environments, where every player can experience attentiveness, expertise, passion, and transparency.

In this context, the Group believes it is essential for solid and sustainable growth to operate in full compliance with applicable regulations and requirements, whether mandatory or voluntary, while ensuring process efficiency, service reliability, and the protection of corporate assets. Compliance therefore **plays a key strategic role** in ensuring sustainability, reputation protection, and long-term value creation.

2. PURPOSE, SCOPE AND REVIEW

This document aims to outline the framework for the ethical, transparent, and compliant management of corporate activities, in line with the **UNI ISO 37301 standard** and the other management systems adopted by the Group.

This Policy applies to **all Lottomatica Group companies**, to their central and operational functions (in Italy and abroad), and to all persons working on behalf of the Company, including employees, collaborators, directors, consultants, agents, suppliers, and commercial partners.

The document is **updated** whenever changes are required due to regulatory developments, organizational changes, or new strategic priorities, ensuring consistency with the best international practices and the Group’s governance objectives.

Any changes and/or additions to this Policy must be approved by the Board of Directors of Company, except for variations related to the mere application of the regulatory provisions that can be approved by the Chief Executive Officer of Lottomatica.

3. GROUP COMMITMENTS

The Lottomatica Group conducts its activities according to principles of legality, integrity, and transparency, recognizing compliance as a strategic element for creating sustainable value and strengthening stakeholder trust.

For compliance management, Lottomatica is committed operating in accordance with the ISO 37301 standard through the implementation of the following **principles and actions**:

- implement control systems suitable for preventing the commission of illicit acts and ensuring behavior based on criteria of correctness, loyalty and moral integrity;
- ensure continuous monitoring of regulatory developments in order to guarantee implementation, ensure dissemination, and promote awareness of applicable rules and regulations;
- observe, at all levels of the company, all laws, rules and regulations and apply appropriate disciplinary procedures, sanctions and corrective measures in the event of violation or non-compliance;
- promptly adapt company processes to changes in the provisions applicable to the Group, including through a preventative approach to compliance risks and the establishment of adequate controls to identify critical issues and potential violations of internal and external regulations;
- conduct their activities in such a way as not to commit any violation of the law, whether direct or indirect, and not to facilitate or risk involvement in illicit situations, with public or private entities;
- provide a framework for identifying, reviewing, and achieving compliance objectives, including with a view to continuous improvement;
- prepare internal tools, both regulatory and operational, that define rules of conduct, principles and/or control models aimed at correctly identifying, measuring, managing and monitoring the main risks associated with compliance;
- identify compliance roles and responsibilities within the organization, both centrally and across regulatory and business sectors, and assign the resources necessary to identify and achieve compliance objectives;
- encourage the reporting of suspicions in good faith or on the basis of a reasonable belief of regulatory violations, without fear of retaliation and ensuring that no whistleblower is discriminated against with effects on working conditions related to the complaint;
- pursue any behavior that does not comply with regulations through the application of the company's disciplinary system, ensuring the necessary legal protection measures, as well as any corrective and improvement actions;
- encourage every possible effort to prevent the commission of illegal acts by third parties having dealings with the company;
- ensure that the corporate structure responsible for the Compliance Management System has the appropriate expertise, status, authority, and independence to perform its role, which consists of overseeing the design and implementation of the system, providing staff with advice and adequate training on compliance matters, and ensuring suitable compliance models with applicable regulations, in particular with the ISO 37301 standard;
- ensure effective and transparent communication that ensures the dissemination of a culture of rules at all organizational levels, through awareness and knowledge of useful information for compliance with applicable internal and external regulations;
- develop monitoring and reporting tools to verify the effectiveness of the internal control system over time, ensuring adequate information flows, including with regard to relevant compliance aspects.

4. COMPLIANCE GOVERNANCE

Accountability and transparency are fundamental pillars of the Group's business model. Every corporate function is called upon to actively contribute to building an ethical, inclusive, and performance-oriented work environment, through behaviors consistent with corporate values and commitments to governance, sustainability, and the protection of collective interests.

Effective implementation of the Compliance Management System requires the conscious and responsible involvement of all components of the organization, each according to their own role and area of expertise, in particular:

- The **Board of Directors** and **Senior Management** play a central role in defining the strategic direction:
 - respectively approve this Policy and promote its adoption;
 - assign responsibilities and authority to ensure that the Compliance Management System conforms to the requirements of ISO 37301 and to be adequately informed about the performance of the System;
 - ensure the allocation of resources necessary for the functioning of the system;
 - they carry out constant supervision over the effectiveness and adequacy of the model, ensuring that it is consistent with company objectives;
 - ensure that the function responsible for the Compliance Management System is independent, has appropriate authority and expertise, as well as direct access to the governing body;
- The **Risk, Ethics & Compliance Department** is responsible for:
 - coordinate the entire Compliance Management System, ensuring its consistency and integration with other management areas;
 - monitor compliance obligations and risks, providing specialist support to the various company departments involved;
 - promote a culture of integrated compliance through awareness and training initiatives;
- The **individual company departments** are required to translate the principles of the Policy into concrete actions, implementing procedures, controls, and behaviors consistent with the defined standards. Each function actively contributes to risk management and process oversight, promoting operational effectiveness and transparency;
- **Employees and collaborators** are required to know and respect the Policy, to participate in training activities and to actively contribute to the prevention of non-conformities, also through the use of the reporting channels made available by the organization;
- **Suppliers and business partners** are required to adhere to and comply with the Group's principles and guidelines. This approach extends corporate values throughout the entire value chain, strengthening trust and shared responsibility.

5. MANAGEMENT TOOLS

With the aim of establishing, implementing, maintaining and continuously improving the Compliance Management System, the Lottomatica Group:

- identifies **compliance obligations**, i.e. the regulatory requirements applicable at national level and specific to the reference sector, monitoring their evolution, in order to ensure compliance with the legislative and regulatory provisions in force in the various areas in which it operates;
- adopts a **risk-based approach**, a key tool for guiding business decisions, which allows you to identify, analyze and weigh the risks of non-compliance, but also to seize opportunities for growth and innovation in processes, products and services;
- establishes clear and measurable **compliance objectives**, promoting a structured approach to their identification, monitoring and updating;
- bases the Management System on a structured set of **integrated procedures and controls** (for example and not limited to: anti-corruption, IT controls, privacy, environment, health and safety) in order to ensure consistency, operational effectiveness and compliance with internal and external regulatory requirements;
- adopts a **reporting system** to encourage the raising of concerns, prohibiting any form of retaliation in cases where attempted, suspected or actual violations of the Compliance Policy or compliance obligations are reported;
- monitors the Management System through **periodic internal and external audits**, as well as key performance indicators (KPIs), which allow for the assessment of the effectiveness of the actions undertaken and the level of compliance with regulatory and voluntary standards. These audits are integrated with control tools that facilitate the analysis of results and the implementation of targeted corrective action/improvement plans.

6. CULTURE AND EDUCATION

Promoting a **corporate culture based on responsibility, integrity, and awareness** is a **central element** of the Company's Compliance model.

The Company promotes a widespread and informed culture of compliance through ongoing training, awareness campaigns, and the use of effective communication channels.

Structured **and ongoing training programs are implemented** for employees and collaborators, with the aim of strengthening skills and awareness regarding compliance, professional ethics, corruption prevention, ESG sustainability, workplace safety, and personal data protection.

Training activities are designed to be accessible and consistent with individual roles and responsibilities, encouraging active participation and effective learning. Through digital modules, thematic workshops, and periodic updates, the Company ensures constant alignment with current regulations and international best practices.

At the same time, this **Policy** is **disseminated in a comprehensive and transparent manner**, ensuring that it is fully understood and shared by all stakeholders. The contents of the Policy are disseminated through the institutional website, the company intranet, and the main internal communication tools, as well as being made available, as appropriate, to suppliers, business partners, and other interested parties.

This approach helps strengthen a sense of belonging and responsibility, promoting behaviors consistent with corporate values and contributing to the creation of an ethical, safe, and inclusive work environment.

7. CONTINUOUS IMPROVEMENT

The Company is committed to **continuously improving the suitability, adequacy, and effectiveness of the Compliance Management System**. To this end, it identifies improvement actions to eliminate the causes of potential non-conformities and prevent their occurrence.

Continuous improvement is also based on the awareness and active involvement of external stakeholders, as well as internal dialogue between departments, roles, and organizational levels. In this regard, the Group promotes constructive dialogue between different company areas, encouraging the sharing of experiences, the identification of critical issues, and the definition of improvement solutions. This approach allows for the consolidation of an organizational culture focused on accountability, transparency, and operational excellence.

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