



# **SUSTAINABILITY** HIGHLIGHTS

**LOTToMatica**

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*This document has been prepared on a voluntary basis and summarises the ESG commitments and activities of Lottomatica Group. The main source of the information provided is the Consolidated Sustainability Report, prepared as of 31 December 2024 in compliance with Directive (EU) 2022/2464 "Corporate Sustainability Reporting Directive" (CSRD), published on the company's website lottomaticagroup.com as part of the 2024 Annual Financial Report and subject to limited assurance by PricewaterhouseCoopers. The document also includes information subsequent to 31 December 2024, where considered significant for the assessment of the Group's performance and to represent its prospective sustainability strategies.*

# LOTTOMATICA GROUP

We are the largest Italian Group in the public gaming sector.  
We offer safe and innovative gaming experiences across all sales channels, always putting responsibility and sustainability first.



# LOTTOMATICA GROUP

## LEADER IN SUSTAINABLE ENTERTAINMENT

**Lottomatica Group is the first Italian operator** in the public gaming sector authorized by the Customs and Monopoly Agency and one of the major players in Europe.

The Group is active in the following operating segments: **Online** (sports betting and online gaming); **Sports Franchise** (sports betting and gaming through the retail network); **Gaming Franchise** (amusement and entertainment machines).

With over **Euro 2 billion in revenues** and **Euro 39 in bets** in 2024, Lottomatica is the **market leader** in all segments of operations and offers **safe and engaging gaming experiences** across all sales channels.

The Group is also the **largest contributor** in the gaming sector, with approximately **Euro 3 billion** paid to the Treasury in 2024.

Lottomatica is **listed on Euronext Milan** managed by Borsa Italiana S.p.A..



€ 39 Mld  
BET



€ 2 Mld  
REVENUES

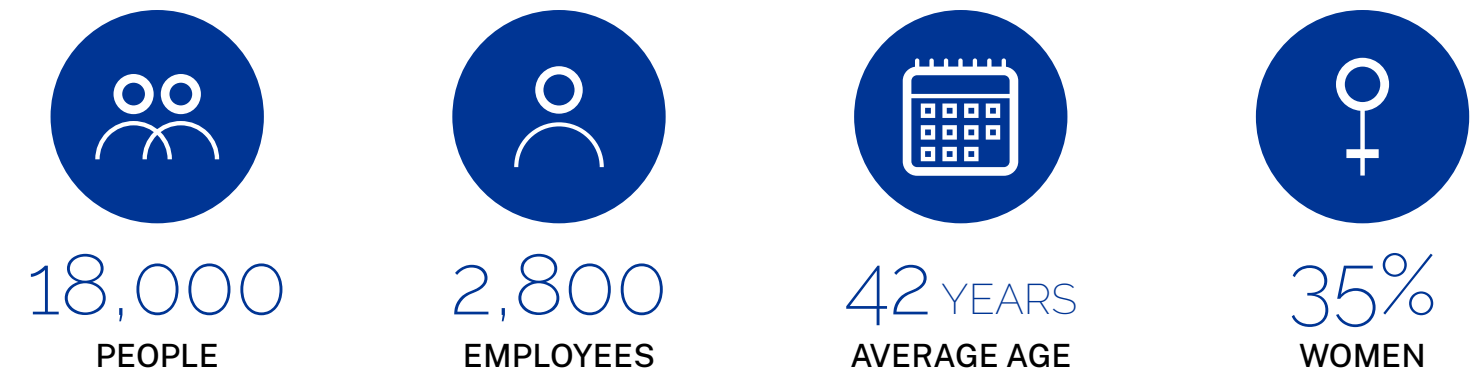


€ 3 Mld  
TAX CONTRIBUTION



## A GREAT TEAM

Lottomatica can count on the expertise of **2,800 direct employees** and over **18,000 people** employed in the specialised franchising network, all of whom provide a wealth of ideas, talent, and experiences that are crucial to achieving the Group's goals.



The Group has also the largest **specialised distribution network in Italy's** gaming sector, with **18,000** points of sale, **4,000** betting shops and corners, **1,100** franchised gaming halls and **130** owned gaming halls, as well as distribution agreements with **12,000** bars and tobacconists.



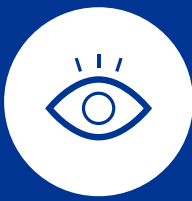
## THE CORPORATE DNA

The essence of Lottomatica is expressed in its **Corporate DNA**, the framework of values that clearly defines what it means to be part of the Group. In 2025, Lottomatica renewed its DNA to represent even more authentically what it has become today. The **Purpose** has been introduced and the corporate **Vision** and **Mission** have been redefined: the former constitutes the Group's profound reason for being and guides the Vision and Mission, which define what it wants to build and how it intends to do so. Supporting this path are the five **Attitudes**, which have always represented Lottomatica's way of being and acting.



### PURPOSE

Provide entertainment experiences where legality and integrity unite to create lasting value for shareholders, individuals, and communities.



### VISION

Lead industry evolution through innovation, reliability, and sustainability.

### ATTITUDES



Excellence  
Exceed expectations



Collaboration  
Be a team



Responsibility  
Act consciously



Inclusion  
Enhance uniqueness



### MISSION

Deliver engaging, safe, and responsible entertainment powered by advanced technology.

### MISSION PILLARS



PEOPLE



SUSTAINABLE  
VALUE



CUSTOMER  
EXPERIENCE



INNOVATION  
& TECHNOLOGY



Entrepreneurial  
Spirit  
Think beyond



## BUSINESS AREAS

The Group operates through subsidiaries belonging to the holding company Lottomatica Group S.p.A..

### ONLINE

Lottomatica is Italy's leading Group in the online gaming segment, where it maintains a presence with the brands **Lottomatica**, **Better**, **Goldbet**, **Betflag**, **Planetwin365**, and **Totosì**.

Distinguished by the **highest standards in terms of safety**, Lottomatica's online offering is able to rely on a comprehensive and innovative portfolio of online gaming products, which can be accessed from the web and via the dedicated apps for smartphones and tablets.

### SPORTS FRANCHISE

Lottomatica leads the physical network betting and gaming sector with four strongly recognizable and popular brands: **Better**, **Goldbet**, **Intralot**, and **Planetwin365**.

A network of **thousands of points of sale** throughout the country, combined with the professionalism of thousands of specialised operators, make Lottomatica the **leading betting operator** in Italy.

### GAMING FRANCHISE

Lottomatica's network connects and monitors **amusement and entertainment machines** within public establishments and dedicated gaming halls throughout Italy, thanks to top quality infrastructure and technologies for **maximum player protection**.

The Group is also engaged in the **direct management of gaming machines and halls**, with a network representing a benchmark for its high levels of service and customer attention, as well as for the **quality and security** of the offer.

CORPORATE GOVERNANCE

The governance of Lottomatica Group is structured with a view to pursuing sustainable success and creating long-term value for all stakeholders, ensuring corporate integrity and maximum transparency in decision-making. The governance structure of the parent company, Lottomatica Group S.p.A., is organised as follows.

SHAREHOLDERS’ MEETING

The Shareholders’ Meeting deliberates in ordinary and extraordinary sessions on matters assigned to its competence by law and the Articles of Association.

“Responsibility, integrity, and transparency are the principles on which Lottomatica’s corporate governance model is based.

BOARD OF DIRECTORS

The Board of Directors is vested with the broadest powers for the management of the company and is responsible for the implementation of management and coordination activities for the other companies in the Group. It is composed of 11 members, of whom **8 are non-executive members**. 54.55% of the **members** (6 out of 11) are **women**, while 72.72% (8 out of 11) are **independent directors** pursuant to the TUF and the Corporate Governance Code issued by the Italian Committee for Corporate Governance (the “**Corporate Governance Code**”).

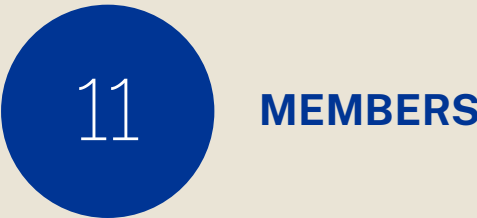
Aware that diversity and inclusion are fundamental elements of corporate culture, Lottomatica has adopted a **Diversity Policy for the Board of Directors** with the specific objectives of:

- seeking a balanced **gender representation** right from the selection of directors, defining quantitative targets linked to specific time frames and in line with the relevant regulatory standards;
- ensure a balanced combination of age groups and seniority;
- maintain an adequate presence of independent and non-executive members;
- ensuring the presence of profiles with **different competencies**, with particular regard to the **sector** in which the Group operates, **economic and financial matters**, legal matters, risk management, remuneration and sustainability policies, including aspects relating to climate change, human rights and corporate conduct, in order to achieve a set of diverse and complementary skills and experiences.

**None of the non-executive directors serves a number of outside boards, other than that at Lottomatica, that exceeds the maximum number of positions established by the Company’s Board of Directors.** The general criteria regarding the maximum number of administrative and control positions in other companies have been established in the document “Guidelines on the maximum number of positions that may be held by directors and auditors”, approved by the Board of Directors on 27 February 2023 in accordance with Recommendation 15 of the Corporate Governance Code, and are reported in the **Report on Corporate Governance and Ownership Structure for the 2024 financial year**.

Read the **Diversity Policy of the Board of Directors** on [Lottomaticagroup.com](#)

Read the **Report on Corporate Governance 2024** on [Lottomaticagroup.com](#)



Members of the Board of Directors



Guglielmo Angelozzi

Chairman and CEO

Non-independent | Executive

Guglielmo Angelozzi started his journey in Lottomatica (Gamenet at the time, owned by Trilantic Capital Partners) in August 2014 as Chief Executive Officer of the Group. He led the development of the Company and the entry of the Group into the sports betting and online sector through the acquisition of the Italian activities of Intralot, the listing on the STAR segment of the Milan Stock Exchange in 2017, and the acquisition of GoldBet. With the acquisition of the Group by Apollo Global Management and the subsequent delisting of the Company in 2020, he continued as CEO of the Group, which expanded through the acquisition of IGT’s non-lotteries gaming activities in Italy, Betflag and SKS365. On 2 July 2025, Guglielmo Angelozzi has been appointed also as Chairman of Lottomatica. The Group, listed on Euronext Milan of Borsa Italiana since May 2023, is today the leader in the gaming market in Italy, having grown over the past ten years from approximately €60 million to around €700 million in EBITDA in 2024 and from circa 200 to over 2,800 employees (pro forma for the latest acquisitions and related synergies). Also, within the entertainment sector, Mr. Angelozzi has been Chairman for three years of the trade association of gaming concessionaires ACADI, (formerly part of Confindustria Servizi Innovativi e Tecnologici, now in Concommercio) and has held various roles at IGT. Before entering the gaming industry, Mr. Angelozzi worked at the management consulting firm Bain & Company –where he managed numerous projects in Media, ICT, Pharma, and Entertainment sectors –and previously at Accenture. He graduated with honors in Engineering from the University of Bologna and obtained a Master of Business Administration from SDA Bocconi in Milan.



Laurence Lewis Van Lancker

CFO and Deputy CEO

Non-independent | Executive

Laurence Van Lancker started his journey in Lottomatica in September 2021 as Chief Financial Officer of the Group. He supported the development of the Company in the consolidation of the Italian gaming market with the acquisitions of Betflag and SKS365, amongst other, and into what is today the leader in the gaming market in Italy, with circa €700 million in EBITDA in 2024 and over 2,800 employees (pro forma for the latest acquisitions and related synergies). Mr. Van Lancker was key in leading the listing of Lottomatica on Euronext Milan of Borsa Italiana in May 2023, and the Group is now included in the Euro Stoxx 600 index. Before joining the Group, he was at Credit Suisse from 2006 to 2021, last in his role as co-head of technology, media and telecom investment banking for EMEA and, prior to that, he was head of Credit Suisse’s TMT M&A practice and Gaming franchise in EMEA. Mr. Van Lancker also worked at Value Partners Management Consulting in Italy from 2000 to 2004. He graduated in Electronic Engineering at La Sapienza University, Rome and obtained a Master in Business Administration from IE Business School.



Nadine Faruque

Lead Independent Director | Director

Independent | Non-executive

Nadine Faruque started her career as a lawyer in private practice in 1990 as an associate with a leading law firm in New York before joining Baer&Karrer in Zurich, Switzerland in September 1992 where she was a senior associate/partner elect, covering M&A, capital markets, banking and financial institutions. In March 1998 she joined Merrill Lynch International in London where she held various senior roles in the Office of General Counsel, including that of General Counsel and Head of Continental Europe. In October 2008, she took the role of General Counsel and Group Compliance Officer of the Unicredit Group where she was a member of the Unicredit Group management board as well as the Group Executive, Group Risk and Group Credit committees before joining Deutsche Bank AG Frankfurt in December 2014 as Global Head of Compliance and member of the Group Executive Committee, the Group Risk Committee, Group Reputational Risk Committee and the Global Incident Management Committee. Following her departure from Deutsche Bank, she was a member of the Supervisory Board and the Risk Committee of Luminor AB from January 2019 to July 2019 and has been an industrial adviser of EQT Partners for compliance and regulatory matters on specific projects. She is a member of the Board of Directors of Banco BPM S.p.A. since April 2020 and a member of the Internal Controls and Risk Committee besides serving on the Advisory Board of the MIB (Master of International Business) of the University Cattolica in Milan. Ms. Faruque graduated from the University of Bern School of Law and holds the title of Fuersprecher and an LLM (Masters in Law) from Duke University School of Law (North Carolina); she is admitted to the Swiss as well as the New York bar. Currently, Ms. Faruque is the Chairwoman of the Nomination and Remuneration Committee, member of the ESG Committee and, as of 2 July 2025, Lead Independent Director of the Company.

NR | RPT | ESG

1



*John Paul Maurice Bowtell*

**Director**

Independent | Non-executive

John Paul Maurice Bowtell is an experienced director with highly relevant industry experience, having spent eight years in the gaming sector serving as Chief Financial Officer for GVC Holdings Plc, one of Europe's largest gaming businesses, after the acquisition of Ladbrokes Coral Group Plc, where for three years he was the president at subsidiary Eurobet, one of Italy's largest gaming businesses. Prior to that, Mr. Bowtell was Chief Financial Officer of First Choice Holidays PLC and became Chief Financial Officer of TUI Travel PLC after its merger with First Choice Holidays PLC in 2007. He previously held a number of senior positions with Centrica, WHSmith and Forte. Mr. Bowtell has been a Non-Executive Director of a number of listed and non-listed companies and is currently a senior advisor to Alchemy, a special situations private equity fund, where he chairs a number of their businesses. He is a chartered accountant and holds an M.A. from Cambridge University.



*Alessandro Fiumara*

**Director**

Non-independent | Executive

Alessandro Fiumara joined Lottomatica Group in 2021, where he currently serves as Managing Director Digital and Betting as well as a chairman and CEO of GBO S.p.A., CEO of GBO Italy S.p.A., CEO of PWO S.p.A., Chairman of Giocaonline S.r.l. and Chairman and CEO of Betflag S.p.A., CEO of Totosì S.r.l. Before joining the Group, he covered several roles in different countries in IGT Group, including the head of strategic planning and control, director of industrial planning and director of the CEO Office. In 2017, Mr. Fiumara started working in the sports betting business in IGT, taking care of product development, marketing and retail. He became the head of sports betting in 2019 and the CEO of Lottomatica Scommesse in 2020. Prior to IGT, Mr. Fiumara spent two years in the strategy and business development department of PosteMobile, the MVNO of Poste Group, and seven years in business consulting in McKinsey & Company and Bain & Company. He graduated cum laude with a degree in Business Administration from LUISS University of Rome in 2003.



*Catherine Renee Anne Guillouard*

**Director**

Independent | Non-executive

Catherine Guillouard started her career at the Ministry of Finance, French Treasury working for the Africa Zone Department - CFA and later in the Office of Banking Affairs. She joined Air France to prepare the IPO in 1997 and hold various senior executive positions including CFO between 2005-2007. She also held the position of Chief Financial Officer and member of the Group Executive Committee at Eutelsat, a leading and global operator of communication via satellites. Subsequently, Mrs. Guillouard joined Rexel as Chief Financial Officer. From May 2014 to February 2017, she was Deputy Chief Executive Officer. Appointed in 2017 by decree of the President of the French Republic, she has been, up to September 2022, Chairwoman and CEO of RATP group which is the number 3 worldwide operator of public transport system. RATP group operates in Paris but also in cities of 15 countries across the world (US, Qatar, Egypt, Italy, UK, Saudi Arabia, Maroc, Australia, etc...). Previously, she has been a board member of Technicolor, Aéroport de Paris, Engie and KPN. Since 2016, Mrs. Guillouard is a board member of Airbus S.E. (member of the Audit Committee and of the Ethics, Compliance, Sustainability Committee). She has been appointed in May 2023 at the board of Air Liquide S.A. (chair of the audit committee). She has been appointed chairperson of the Ingenico S.A. board on September 30, 2022 and in november 2024, she has been appointed member of the board of directors of Arrive S.A., both non listed corporations.



*Augusta Iannini*

**Director**

Independent | Non-executive

Augusta Iannini served as judge in Italy. During her career within the judicial system she has held numerous relevant positions, including those of investigating judge and judge for preliminary investigations. She has also served in the Ministry of Justice as Deputy Chief of the Cabinet, Director General of Criminal Justice, and Head of the Department of Justice Affairs. She was also Head of the Legislative Office at the Ministry of Justice from June 2008 until June 2012. From 2012 to 2020, she served as vice president of the Data Protection Authority where she served as Vice President. She is author of numerous papers and attended several conferences. In 2009 she was awarded the Bellisario Prize for Justice. She holds positions as a member of boards of companies, among which SNAM S.p.A. and member of Board of Directors of Lottomatica Foundation.

CR | ESG

2

RPT | NR | CR

1



*Marzia Mastrogiacom*  
**Director**  
Independent | Non-executive

Marzia Mastrogiacom is a business executive with over 25 years' experience with multinational and national companies in different industries for complexity and stakeholders: FMCG, Financial and Payment Services, Regulated Markets and Concessions cooperating with Public Administrations. She was CEO of two public gaming concessionaires part of the IGT Group where she was responsible for Lotto and Gratta & Vinci business. In recent years, after taking a specific training at business schools of Cambridge and Berkeley, Ms. Mastrogiacom has been mastering Sustainability, Innovation and Digital Transformation impacts and opportunities for corporations. She is strategic consultant with specific focus on the integration of ESG issues in business strategies, organizations, and corporate operational processes.

ESG | NR



*Gaia Mazzalveri*  
**Director**  
Independent | Non-executive

Gaia Mazzalveri has 30 years of experience in Investment Banking and Financial Markets. Ms Mazzalveri has an important track record in mergers and acquisitions, ECM and DCM transactions in the Financial Institutions sector, having assisted all the main financial, banking and insurance companies, private equity funds, companies operating in the para-Banking sector, Banking Foundations and institutions particularly in Italy, as well as operating in some industrial sectors. Ms Mazzalveri was Co-Head of Investment Banking at Equita Sim, Assistant to the Chief Executive Officer at Banco Popolare, Executive Director at Morgan Stanley, Head of FIG at Mediobanca and Senior Associate at Ernst & Young. She was also a member of the Board of Directors of Atlantia, Datalogic, Alba Leasing, Bormioli Rocco and Esperia SGR. In 2020 Ms. Mazzalveri joined Vitale&Co. S.p.A. as partner.

CR | RPT



*Tiziana Togna*  
**Director**  
Independent | Non-executive

Tiziana Togna, after graduating in Business and Economics, began and continued her entire career at CONSOB. Throughout her professional activity, she held numerous prominent positions across the various areas of competence of the Authority, including Head of the Inspection Division and the Intermediaries Division. From 2019 to 2023, she served as Deputy General Director (Vicedirettore Generale), with delegated responsibilities for the coordination of intermediaries, issuers, and corporate governance. From 2020 to 2022, she also performed the duties of General Director (Direttore generale facente funzioni). Since 2024, she has been a member of the technical working group on issuers established at the Ministry of Economy and Finance (MEF), in charge of analyzing and exploring issues related to the comprehensive reform of capital markets regulations. Starting from October 2025, she serves as a non-executive and independent member of the Board of Directors of Mediobanca S.p.A..

RPT  1



*Fabrizio Virtuani*  
**Director**  
Independent | Non-executive

Fabrizio Virtuani is Contract Professor in Luiss Business School in the subjects of Digital Transformation, Technological Innovation, ICT Management, Artificial Intelligence and Cybersecurity, in Master in Management and Technology, in Master in Big Data, in Master in Cybersecurity, in Master in Information Technology and Artificial Intelligence, and he was Scientific Coordinator of the Master in Management and Technology - Major in M&A. He has significant experience as President, CEO and C-level Executive in national and international companies, and high expertise in Digital Transformation, Technological Innovation, Cybersecurity, Artificial Intelligence, Information Systems Management and Telecommunication Technologies. He was Chief Executive Officer of Innova, Director of Innovation, Technology and Information Systems of the Tea Group, President and CEO of Lottomatica Betting and Senior Vice President Digital & Betting of Lottomatica (IGT Group, now Brightstar Lottery), Director of the Information Technology function of the Poste Italiane Group, CEO of PosteMobile, as well as Chairman of the Global Cyber Security Center Foundation and Chairman of the Board of Postecom S.p.A. Previously, he worked at Bain & Company Italy as Associate Partner and at Italtel-Siemens as Marketing and Planning Manager of the Business Unit radiomobile systems. He holds a degree in Electronic Engineering from the Politecnico di Milano.

CR

Internal Committees of the Board of Directors

The following committees have been established within the Board of Directors of Lottomatica Group S.p.A.: the Control and Risk Committee; the Nomination and Remuneration Committee; the ESG Committee; and the Related Party Transactions Committee.

BOARD OF STATUTORY AUDITORS

The Board of Statutory Auditors of Lottomatica Group S.p.A. performs control functions and is in charge of supervising the compliance with the law and the Articles of Association, the compliance with the principles of proper administration, and the adequacy of the company's administrative, organizational and accounting structure and its actual operation.

SUPERVISORY BOARD

The Supervisory Board, invested with autonomous powers of initiative and control, has the task of supervising the operation of and compliance with Model 231.

AUDITING FIRM

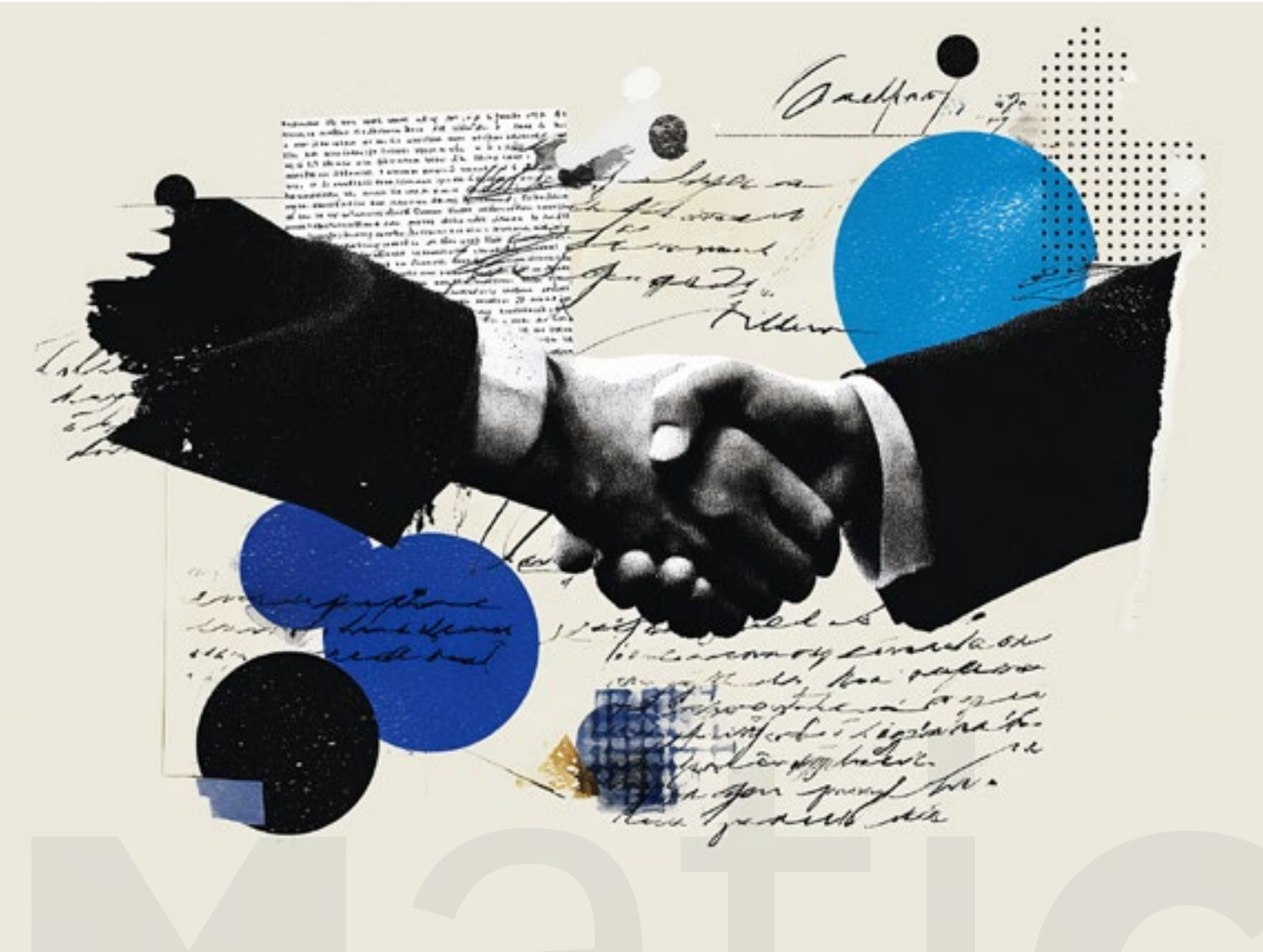
The statutory audit service has been entrusted for the duration of nine fiscal years starting in 2023 to PricewaterhouseCoopers (PwC), a registered auditing firm on the special register, appointed for this purpose by the Shareholders' Meeting.

SUSTAINABILITY GOVERNANCE

Over the years, the Group has strengthened the path geared toward the **integration of sustainability** in all corporate dimensions, ensuring control over the ESG strategy and its related plan, and the **management of sustainability-related impacts, risks, and opportunities** through a governance distributed among the relevant internal stakeholders.

In addition, the Company has adopted a mission that integrates the **17 Sustainable Development Goals** covering every area of social, economic, and environmental development, considered in an integrated and organic manner, to the achievement of which Lottomatica intends to make an active contribution.

**Sustainability governance is structured across multiple organisational levels**, ranging from the Board of Directors to the departments most involved in specific sustainability issues. Added to these is the role of the **ESG Officer**, who is responsible for coordinating and overseeing the implementation of the Sustainability Plan's activities.



BOARD OF DIRECTORS

The Board of Directors plays a strategic role and holds a position of absolute centrality in Lottomatica's corporate governance system. It is **responsible for defining the Group's strategic guidelines and objectives**, also in relation to the Sustainability Plan, as well as the nature and level of risk compatible with these strategic guidelines, taking into account all factors that may be relevant to sustainable success, intended as long-term value creation.

BOARD'S INTERNAL ESG COMMITTEE

The ESG Committee is composed of **three members** of the Board of Directors, all of whom are **non-executive** and **mostly independent** according to the independence requirements set out in the Corporate Governance Code, with cross-functional expertise including sustainability, and assists the BoD in carrying out tasks related to **promoting the integration of sustainability into the Group's strategy and corporate culture**, supervising how ESG issues are integrated into the business model and disseminated to all stakeholders. In addition, the Committee provides investigative, proactive and advisory support on sustainability guidelines and objectives, supervising the initiatives and programmes promoted by the Company to achieve them, monitoring their results and ensuring ongoing dialogue with stakeholders. The Committee also examines and assesses the evolution of sustainability in light of international guidelines and principles on the subject, as well as industry and market best practices, providing guidelines to the Board of Directors for the adjustment of medium-to long-term strategies. In addition, it monitors the progress of actions taken to achieve sustainability objectives relating to the business of the Company and its subsidiaries, taking into

account the interests of stakeholders. It is responsible for reviewing documents containing non-financial information and assessing the suitability of periodic non-financial information to accurately represent the Company's business model, strategies, the impact of its activities and its performance. The ESG Committee interacts with the Company's ESG Management Committee and, in general, with any corporate function responsible for the governance of ESG strategies and programme. Finally, it reports periodically to the Board of Directors on the activities carried out.

BOARD’S INTERNAL CONTROL AND RISK COMMITTEE

The Control and Risk Committee is composed of **four members of the Board of Directors**, who are **non-executive and mostly independent**, in accordance with the independence requirements set out in the Corporate Governance Code. The Committee as a whole has adequate expertise in the sector in which the Company operates, enabling it to assess the related risks. At least one member of the Control and Risk Committee has knowledge and experience in accounting and finance or risk management. The Committee is responsible for **assisting the Board of Directors with** investigative and proactive **advisory functions** in **assessments and decisions relating to the internal control and risk management system**, as well as those relating to the approval of periodic financial reports. The Committee, *inter alia*, reviews the content of the periodic non-financial report relevant to the internal control and risk management system. Finally, it reports periodically to the Board of Directors on the activities carried out.

ESG MANAGERIAL COMMITTEE

The ESG Managerial Committee is in charge of **developing the ESG strategy, Sustainability Plan** and related **programs**, setting **ESG targets** and **monitor-**

**ing** related **KPIs**. It coordinates with the Board’s internal ESG Committee and, under the coordination of the ESG Office, includes the heads of the departments HR & Organisation; Finance, Control & Credit; Legal; and External Relations & Communications.

Furthermore, in order to translate ESG strategies into concrete commitments and implement initiatives, the following **operational committees** have been established:

CULTURAL INNOVATION COMMITTEE

The Cultural Innovation Committee, which has replaced the previous Diversity & Inclusion Committee, aims to propose and implement strategies and initiatives aimed at promoting an increasingly open and inclusive corporate culture, and is divided into five areas of commitment: Cultural diversity, Disability & accessibility, Gender equality, Generational diversity, and LGBTQ+.

RESPONSIBLE GAMING COMMITTEE

The Responsible Gaming Committee is tasked with promoting greater integration between business processes and the Responsible Gaming Programme, ensuring maximum focus on commitments and objectives in the area of responsible gaming and player protection, both at corporate and business level.

GENDER EQUALITY COMMITTEE

The Gender Equality Committee is responsible for supporting the **definition of the Gender Equality Policy**, ensuring inclusion, integration and equal opportunities within the organisation, and identifying initiatives aimed at overcoming all forms of discrimination in the workplace.

ENVIRONMENTAL SUSTAINABILITY COMMITTEE

The Environmental Sustainability Committee is responsible for developing the annual plan of activities for the **development of the environmental sustainability strategy**, identifying targets for reducing emissions across all Group companies, ensuring that environmental certifications are obtained and promoting a genuine environmental culture within the company.



# THE GROUP'S ESG COMMITTMENT

*Generating lasting and sustainable value by combining innovation, reliability and sustainability to make entertainment an engaging, safe, and responsible experience is at the heart of the Lottomatica Group's DNA.*

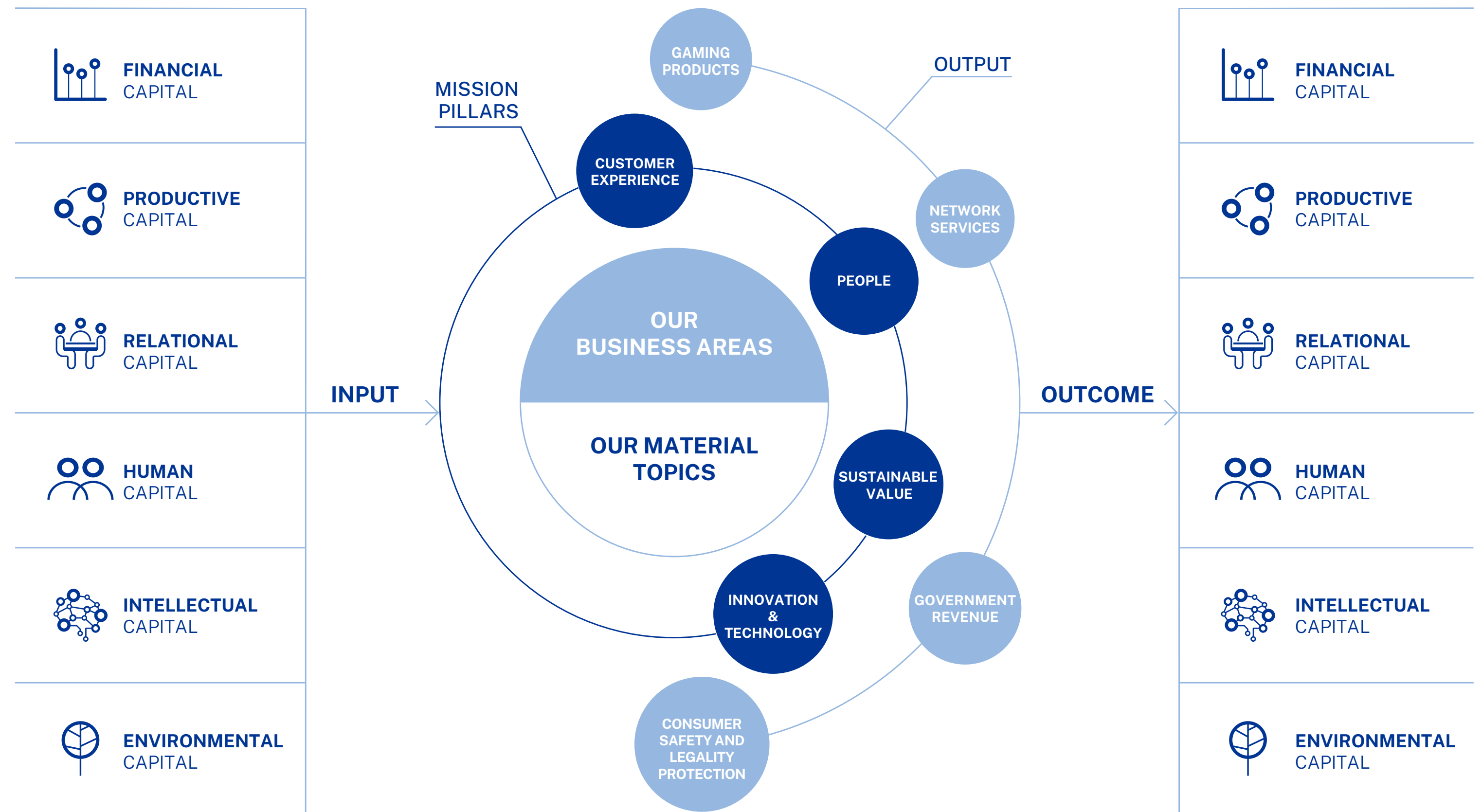


# THE GROUP'S ESG COMMITTMENT

Aware of its role as a leading company in the public gaming sector in combating climate change and triggering virtuous behaviour throughout the value chain, Lottomatica has always devoted the utmost attention to the **sustainability of its activities**. For this reason, over the years, the Group has embarked on a path of increasing **commitment to ESG issues** and their **potential impacts on the community**, building solid governance and a structured **ESG strategy** aimed at integrating sustainability drivers into the corporate business model.

## VALUE CREATION MODEL

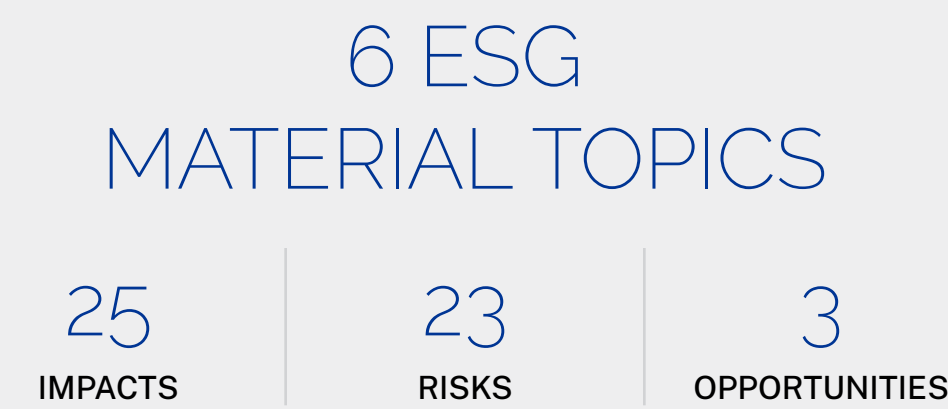
The value creation model describes the process of transformation of the different classes of capital with which the Group interacts, both in its own business and in pursuit of its ESG objectives. Through its **business activities**, the Group's **DNA traits** and the focus on **sustainability issues found to be relevant** by the double materiality analysis, capital inputs (input) are able to produce **successful outputs** and **generate positive impacts** (outcomes), creating value for all stakeholders in the short, medium and long term.



DIALOGUE WITH STAKEHOLDERS

As a leading company in the highly strategic and sensitive public gaming sector, the Group’s activities attract significant attention and interest from a **wide number of stakeholders**. With them, Lottomatica maintains a **transparent** and **open dialogue**, recognising the importance of their **active engagement** in developing a sustainable business model focused on value creation.

|                            |                                                                                                                                                                                                                                                        |
|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| LOTTOMATICA'S STAKEHOLDERS | <b>EMPLOYEES AND COLLABORATORS</b><br>of offices, points of sale, and other workplaces                                                                                                                                                                 |
|                            | <b>SHAREHOLDERS AND THE FINANCIAL COMMUNITY</b><br>including: credit institutions, investment funds, shareholders, bondholders, potential investors, and other financial entities                                                                      |
|                            | <b>SECTOR OPERATORS AND SUPPLIERS</b><br>including: commercial partners, hardware and software technology suppliers, logistics companies, service providers, certification bodies, operators, consulting companies                                     |
|                            | <b>CUSTOMERS</b><br>of the online and physical sales networks                                                                                                                                                                                          |
|                            | <b>REGULATORY BODIES AND PUBLIC ADMINISTRATIONS</b><br>including: the Customs and Monopolies Agency, the Ministry of Economy and Finance, Ministry of Health, Ministry of Environment, Central and Local Administrations, and Law Enforcement Agencies |
|                            | <b>COMMUNITIES</b><br>including: local communities, universities, scientific research institutes, cultural and sports associations and organisations, consumer associations, and the media                                                             |



GROUP’S RISKS, IMPACTS, AND OPPORTUNITIES

The Group periodically updates its **materiality analysis** process in line with the most widely used and globally accepted reporting standardsIn 2024, Lottomatica revised its materiality analysis process to align with the **ESRS standards** and the Materiality Assessment Implementation Guidance (MAIG) developed by EFRAG, incorporating both **impact materiality** and **financial materiality** perspectives in compliance with the **Corporate Sustainability Reporting Directive (CSRD)**, the new European Directive on Sustainability Reporting implemented in Italy in September 2024.

LEGEND

I+

Positive impact

I-

Negative impact

R

Risk

O

Opportunity

|                                                                                |                                                                           | ESRS TOPIC                                                                                                                                 |                                                                          |                                                                                        |                                                                               | I                                                                                                       | R | O |   |
|--------------------------------------------------------------------------------|---------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|---|---|---|
| ENVIRONMENT                                                                    | E1                                                                        | CLIMATE CHANGE                                                                                                                             |                                                                          |                                                                                        |                                                                               |                                                                                                         | 2 | - | - |
|                                                                                |                                                                           | <div><div>I-</div> GHG emissions production</div> <div><div>I+</div> Energy consumption from renewable sources</div>                       |                                                                          |                                                                                        |                                                                               |                                                                                                         |   |   |   |
| ENVIRONMENT                                                                    | E5                                                                        | CIRCULAR ECONOMY                                                                                                                           |                                                                          |                                                                                        |                                                                               |                                                                                                         | 1 | - | - |
|                                                                                |                                                                           | <div><div>I-</div> Waste production and disposal</div>                                                                                     |                                                                          |                                                                                        |                                                                               |                                                                                                         |   |   |   |
| SOCIAL                                                                         | S1                                                                        | OWN WORKFORCE                                                                                                                              |                                                                          |                                                                                        |                                                                               |                                                                                                         | 8 | 6 | 2 |
|                                                                                |                                                                           | <div><div>I+</div> <div>O</div> Employment stability and work-life balance</div>                                                           |                                                                          | <div><div>I+</div> <div>I-</div> <div>R</div> Health and safety at work</div>          |                                                                               | <div><div>I-</div> Gender discrimination</div>                                                          |   |   |   |
|                                                                                | <div><div>I+</div> <div>O</div> Employee attraction and development</div> |                                                                                                                                            | <div><div>2xI-</div> Respect for human rights and labour standards</div> |                                                                                        | <div><div>I-</div> <div>5xR</div> security and data protection</div>          |                                                                                                         |   |   |   |
|                                                                                | S2                                                                        | WORKERS IN THE VALUE CHAIN                                                                                                                 |                                                                          |                                                                                        |                                                                               |                                                                                                         | 5 | - | - |
|                                                                                |                                                                           | <div><div>I+</div> <div>I-</div> Health and safety at work</div>                                                                           |                                                                          | <div><div>I-</div> Respect for human rights</div>                                      |                                                                               |                                                                                                         |   |   |   |
|                                                                                |                                                                           |                                                                                                                                            | <div><div>I+</div> Expansion and updating of professional skills</div>   |                                                                                        | <div><div>I-</div> IT security and data protection</div>                      |                                                                                                         |   |   |   |
|                                                                                | S4                                                                        | CONSUMERS AND END USERS                                                                                                                    |                                                                          |                                                                                        |                                                                               |                                                                                                         | 3 | 8 | 1 |
|                                                                                |                                                                           | <div><div>I+</div> Consumer protection and adoption of responsible commercial practices</div>                                              |                                                                          | <div><div>3xR</div> Management of technological infrastructure at points of sale</div> |                                                                               |                                                                                                         |   |   |   |
| <div><div>I-</div> <div>5xR</div> IT security and data protection</div>        |                                                                           | <div><div>I-</div> Presence of gambling disorder cases</div>                                                                               |                                                                          |                                                                                        |                                                                               |                                                                                                         |   |   |   |
| <div><div>O</div> Providing a safe gaming environment and legal channels</div> |                                                                           |                                                                                                                                            |                                                                          |                                                                                        |                                                                               |                                                                                                         |   |   |   |
| GOVERNANCE                                                                     | G1                                                                        | BUSINESS CONDUCT                                                                                                                           |                                                                          |                                                                                        |                                                                               |                                                                                                         | 6 | 9 | - |
|                                                                                |                                                                           | <div><div>I+</div> <div>2xI-</div> Respect for Lottomatica's values and principles within the Company and throughout the value chain</div> |                                                                          | <div><div>I+</div> Transparency in relations with institutions</div>                   |                                                                               | <div><div>I+</div> Compliance with tax obligations</div>                                                |   |   |   |
|                                                                                |                                                                           | <div><div>3xR</div> Compliance with anti-corruption and anti-money laundering regulations</div>                                            |                                                                          | <div><div>R</div> Compliance with inside information regulations</div>                 |                                                                               | <div><div>2xR</div> Potential economic damage caused by individuals inside or outside the Company</div> |   |   |   |
|                                                                                |                                                                           | <div><div>3xR</div> Selection and contracting of suppliers and management of procurement processes</div>                                   |                                                                          |                                                                                        | <div><div>I+</div> Empowering the supply chain on sustainability issues</div> |                                                                                                         |   |   |   |

SUSTAINABILITY PLAN

The Group's **commitment to creating positive impacts** for the people, the environment, and all stakeholders is demonstrated by its ambitious and rigorous approach to managing ESG issues. Over the years, Lottomatica has established a **solid ESG strategy**, designed to integrate sustainability drivers into its business model and made of an extensive **Sustainability Plan** as well as a set of dedicated **Policies and Programmes**.

The Group's **Sustainability Plan** is structured around **three clearly identified ESG commitment areas: Responsibility, People, Community and Environment**. The company's sustainability programmes and objectives focus on these pillars, through a series of actions and initiatives across the various operating sectors.

RESPONSIBILITY  
WE ACT  
RESPONSIBLY

Legal and  
responsible gaming



Player  
protection

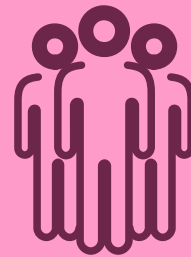


Governance,  
ethics, and integrity



PEOPLE  
WE CARE  
ABOUT PEOPLE

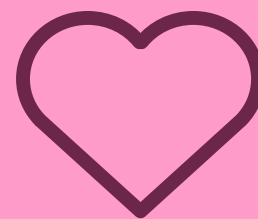
People development  
and valorisation



Diversity, inclusion,  
and equal  
opportunities



Health & safety,  
welfare  
and well-being



COMMUNITY AND  
ENVIRONMENT  
WE SHARE WITH  
COMMUNITIES

Community



Environment



Network,  
partners,  
and suppliers



# LOTTOMATICA'S SUSTAINABLE DEVELOPMENT GOALS

Lottomatica Group adheres to the **United Nations 2030 Agenda**, an action program adopted in 2015 by the United Nations guiding institutions, governments, businesses and citizens towards building a more sustainable future.

Lottomatica intends to actively contribute to the achievement of **8 Sustainable Development Goals (SDGs)** out of 17 in total, through a series of objectives and targets defined within the Sustainability Plan, in a path of collaboration and responsibility necessary to face the complex challenges of today and tomorrow.

## SUSTAINABLE DEVELOPMENT GOALS



## ADHESION TO THE UN GLOBAL COMPACT

The importance that Lottomatica attributes to sustainability and to ethical, economic and environmental responsibility, as well as to the integration of these aspects in its business activities, is further reflected in the Group's adherence to the **UN Global Compact** and to its **ten principles**.

This initiative was launched by the United Nations to promote the construction of a sustainable global economy: respectful of human and labor rights, diversity, environmental protection, and the fight against corruption.

### HUMAN RIGHTS

- 1. **Support and respect** the protection of internationally proclaimed human rights within the respective spheres of influence.
- 2. **Make sure** not to be complicit in human rights abuses, even indirectly.

### LABOUR

- 3. **Uphold** the freedom of association and the effective recognition of the right to collective bargaining.
- 4. **Work toward** the elimination of all forms of forced and compulsory labour.
- 5. **Work toward** the effective abolition of child labour.
- 6. **Work toward** the elimination of discrimination in respect of employment and occupation.

### ENVIRONMENT

- 7. **Support** a precautionary approach to environmental challenges.
- 8. **Undertake** initiatives to promote greater environmental responsibility.
- 9. **Encourage** the development and diffusion of environmentally friendly technologies.

### ANTI-CORRUPTION

- 10. **Work** against corruption in all its forms, including extortion and bribery.



### SUSTAINALYTICS ESG RATING

Lottomatica Group S.p.A. has been assessed by Morningstar Sustainalytics with an **ESG Risk Rating of 12.5 out of 100**, which equates to a low risk of significant financial impact related to ESG factors.

This result places Lottomatica Group S.p.A. among the companies with the lowest ESG risk overall, **ranking first worldwide** among the 68 companies assessed in the “Casinos and Gaming” sub-industry, and fifteenth among the 437 companies evaluated in the broader “Consumer Services” industry.

Morningstar Sustainalytics is an international ESG rating agency that assesses around 15,000 companies in total, measuring their exposure to ESG risks specific to the sector in which they operate and the effectiveness with which these risks are managed.

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### MSCI ESG RATING

In 2025, Lottomatica Group S.p.A. obtained the highest **AAA** score in the **MSCI ESG Ratings** assessment, placing itself in the “**Leader**” category.

MSCI ESG Research provides MSCI ESG Ratings on global public and a few private companies on a scale of AAA (Leader) to CCC (Laggard), according to exposure to industry-specific ESG risks and the ability to manage those risks relative to peers.

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# RESPONSIBILITY

## WE ACT RESPONSIBLY

*Lottomatica operates with full awareness of its role in promoting a model of legal and responsible gaming, recognising consumers as individuals who must be protected and offered innovative, engaging, high-quality, and completely secure gaming experiences. The Group meets the highest standards of ethics and integrity through governance models and procedures designed to protect all stakeholder.*



# RESPONSIBILITY

## WE ACT RESPONSIBLY

### LOTTOMATICA'S COMMITTMENT TO RESPONSIBLE GAMING

Lottomatica is committed to taking all necessary measures to ensure that the **attention to responsible gaming** is a central element in the development of its business strategy and daily operations. To this end, the Group works daily and in full compliance with current regulations to ensure **maximum protection for users** in terms of safe gaming, prevention of excessive gaming, and protection of minors, promoting a **responsible and informed approach to gaming** and supporting its customers so that they approach these activities in a **healthy manner** and **within their limits**.

This commitment, formalised in the **Group's Code of Ethics**, is governed by a specific **Responsible Gaming Policy** and a **Responsible Marketing Policy** and is implemented in practice through the **Responsible Gaming Programme**.



The issue of Responsible Gaming is addressed by the Company with extreme care and as conscientiously as possible in the interests of protecting minors and players.

In this regard, the Company:

- undertakes vis-à-vis its customers to introduce any type of activity that could increase their sense of responsibility in respect of the practice of gaming;
- informs users and customers as required by the applicable legal provisions about the probability of winning, the risks of gaming and the envisaged prohibitions. Communication activities are focused on increasing the awareness of players and helping them understand and monitor their specific gaming habits;
- trains all of its personnel, both those in contact with customers and players and others, so that they are able to support and help those who do not consider gaming a recreational activity;
- does not access to gaming to minors aged less than 18. In this regard, the Company has provided specific requirements to the entire sales network to ensure that gaming requests from minors aged less than 18 are not accepted.

*Lottomatica Group Code of Ethics*

RESPONSIBLE GAMING POLICY  
AND PROGRAM

Lottomatica Group, fully aware of the risks associated with its activities, has adopted a **Responsible Gaming Policy**, approved by the Board of Directors, which aims to define the set of principles, rules, and procedures that guide the management and governance of responsible gaming.

Read the **Responsible Gaming Policy** on [Lottomaticagroup.com](https://lottomaticagroup.com)

The main **guidelines of commitment to responsible gaming**, which the Group aims to ensure through this policy, concern:

- protection of minors;
- prevention of excessive gaming;
- promotion of a responsible model of gaming.



**Protection of minors**, by taking specific measures to prevent any form of access to gaming by under-aged individuals



**Prevention of excessive gaming**, through training, monitoring and governance tools, and support for players with gaming problems



**Promotion of a responsible model of gaming**, understood as a form of entertainment to be chosen with awareness and characterized by clarity, comprehensiveness and impartiality of information

GOALS AND ACTIVITIES

The main objectives identified in terms of responsible gaming are:

- ensuring **compliance with** gaming and health protection **rules and regulations**;
- providing for a **reduction in the impact** of the business, including through risk analysis;
- collaborating with relevant stakeholders, aligning responsible gaming strategies with their expectations;
- generating internal awareness through **continuous training** of all employees;
- incorporating tools for the **prevention of pathological gambling** into products and services;
- implementing tools to **monitor** player behaviour in order to identify potential problems;
- ensure that all promotional activities comply with the **Responsible Marketing Policy**;
- act in a conscious and consistent manner towards all stakeholders;
- promote responsible gaming behaviour towards customers and consumers;
- **report periodically on responsible gaming initiatives and results** through corporate communication touchpoints and annual reports.

In order to effectively pursue these goals, the Group annually defines a solid **Responsible Gaming Program** focused on the following **four macro-areas of activity**:

**TRAINING AND AWARENESS OF RESOURCES** on responsible gaming issues

**INFORMATION AND AWARENESS OF PLAYERS** on issues related to gaming and possible related disorders

**PREVENTION AND MITIGATION OF IMPACTS** resulting from improper gaming behaviours

**STUDY AND RESEARCH** on responsible gaming issues





TRAINING AND AWARENESS OF RESOURCES

Training on responsible gaming is provided to all employees, with particular attention to staff in direct contact with players, with the aim of providing specific skills for the prevention of underage gaming and for combating problem gaming and gambling disorder. The Group also provides employees with an anonymous channel to report any personal problems with gaming or concerns on the subject.

Projects and initiatives

- **First-level training for all employees and the direct network**, delivered via e-learning and developed in collaboration with CEPID, the “Integrated Psychiatric Centre for Research, Treatment and Prevention of Addiction”, created through a partnership between the Agostino Gemelli University Hospital Foundation IRCCS and Lottomatica Foundation. From 2023, this course will be accessible to **100%** of the company’s workforce and from 2025 it will be part of mandatory internal training. The course also covers **100%** of directly managed gaming halls and **over 70%** of betting halls and the indirect VLT network;
- **Second-level training for staff in direct contact with customers**, which must be mandatory carried out, also in person, and is delivered through partnerships with leading organisations, including international ones such as Gambling Therapy. The aim of the courses is to provide detailed knowledge of procedures, tools and actions useful for recognising, preventing, and containing possible cases of problem gambling. This training was delivered in 2024 to **100%** of Customer Support, Digital Operation, CRM and VipTeam staff.

INFORMATION AND AWARENESS OF PLAYERS

In line with its approach to responsible gaming and the provisions of its **Responsible Marketing Policy**, the Group is committed to providing **communications that are purely informative** and have no commercial or promotional purpose, aimed at maximising customer awareness so that they can approach gaming in a safe and responsible manner.

Projects and initiatives

- **New logo dedicated to Responsible Gaming**, created in 2024 and featured on all communication materials distributed by the Group both online and offline.
- **Corporate responsible gaming campaign “Non Giocare Se” (“Don’t Play If”)**, created in 2024 with the scientific collaboration of CePID with the aim of raising awareness of the risks of gambling addiction and distributed in betting rooms and directly and indirectly managed rooms of the VLT sector, covering over 4,000 points of sale, as well as on all online gaming platforms.
- **Tools for online gaming**, with a new interactive self-assessment test and a new dashboard released in 2024, which add to the features already present within the Lottomatica platforms, developed to guide customers towards greater awareness of their gaming behaviour and discourage any problematic behaviour, including:

- monitoring of online activities (history of logins, transactions and gaming activities);
- automatic disconnection from the account (in case of inactivity for more than 20 minutes);
- voluntary self-limitation of the weekly deposit limit (mandatory to open a gaming account);
- voluntary self-exclusion from gaming, either temporary (for 30, 60, or 90 days) or permanent.



PREVENTION AND MITIGATION OF IMPACTS

In conducting its business activities, Lottomatica gives absolute priority to **consumer protection** at every stage of the customer experience, from product selection and development to their distribution through physical and online channels. The Group is therefore strongly committed to **preventing, measuring, and mitigating the negative impacts** of improper gaming behaviour, also through innovative solutions for **monitoring responsible gaming** and gaming activities, in order to detect and prevent problematic behaviour, in compliance with current legislation and personal data protection regulations.

Projects and initiatives



- **“Safe Plai” system**, a proprietary software developed in 2024, in compliance with GDPR requirements and in collaboration with the CePID of the Policlinico Gemelli Foundation in Rome, for **monitoring and preventing risks arising from online gaming**. It is based on a predictive algorithm capable of segmenting the customer base according to eight different behavioural indicators.
- **“Gioco Intelligente” screening**, a proprietary software for **monitoring responsible gaming in directly managed gaming halls** through the completion of a digital form by specially trained hall managers to anonymously and aggregately track any problematic behaviour and corrective actions taken.
- **800 55 88 22**  
NATIONAL HELPLINE OF THE  
ISTITUTO SUPERIORE DI SANITÀ
- **National Toll-Free Number** for gambling issues (TVNGA), an anonymous and free service managed by the Istituto Superiore di Sanità, promoted across all channels, both physical and online, with the addition of references to specialised centres at a local level (SERD and ASL) in points of sale.
- **Specific intervention protocols** for the sales network and contact centre operators, with actions ranging from the administration of self-assessment tests based on the PGSI (Problem Gambling Severity Index) to the provision of tools for greater control of gaming activity (physical timers made available within the direct network of gaming halls and self-limitation systems for online gaming accounts), and to inviting remote channel players to completely self-exclude, followed by providing national and local contacts for specific assistance.
- **Gambling Therapy**, a service provided by Gordon Moody (the UK’s leading provider of therapy and support services in the gaming sector), with which Lottomatica has been collaborating since 2022, offering assistance and support for gambling problems through tools such as: multilingual helplines and support groups, forums and direct assistance via email, and a dedicated app with information and tools to help identify and overcome any gambling problems.



Study and research

Lottomatica actively promotes the **study and research on legal and responsible gaming**, creating opportunities for in-depth study and discussion on the role played by the legal gaming industry, in particular, in relation to the protection of public order, legality and consumer protection. Within this framework are the collaborations with universities, such as the **Milan Polytechnic** and **Bocconi University**, and medical-scientific research bodies, mainly aimed at:

- support clinical and research activities aimed at preventing, combating, and treating pathological addiction disorders;
- contribute to the implementation of studies and research on the subject;
- spread knowledge and awareness among stakeholders through scientific and measurable evidence;
- contribute to the continuous improvement of the Group’s activities and initiatives through ongoing dialogue with national and international operators.

Within this framework is the collaboration with **CePID**, the Integrated Psychiatric Centre for the research, treatment, and prevention of Addictions, inaugurated at the beginning of 2023 and born from the collaboration started in 2022 between **Agostino Gemelli University Hospital Foundation** IRCCS and Lottomatica Foundation which, in addition to training activities aimed at its own network and employees, contributes scientific activities to analyze the phenomenon.

RESPONSIBLE MARKETING POLICY

In order to provide the highest levels of consumer protection and safeguarding, from 2022 the Group adopts a specific **Responsible Marketing Policy**, which defines the principles and standards of reference for the development, selection, communication, and marketing of products, in compliance with current legislation and the company's commitment to promoting responsible gaming as key to business sustainability.

 Read the **Responsible Marketing Policy** on [Lottomaticagroup.com](https://lottomaticagroup.com)

*The Group's priority is to protect players at every stage of their customer experience through responsible conduct policies, from the selection and creation of products to their distribution through all channels and points of contact with end customers and, more generally, with consumers.*

*Lottomatica's general commitment to responsible marketing*

The **guidelines of the Responsible Marketing Policy** mainly refer to:

- **transparency of offers**, features and gaming conditions, which must always be presented in a clear, truthful, and unambiguous manner in order to enable a healthy and informed approach to gaming;
- **attention to minors**, both in terms of combating underage gaming in any form and in the creation and communication of products and services, which must avoid the use of content and language that could attract people under the age of 18 and ensure age gating;
- **attention to excessive gaming**, avoiding any initiative and/or message that could be misleading or encourage inappropriate gaming behaviour;
- **promotion of a responsible gaming model**, with the aim of promoting the concept of healthy and conscious gaming, in which fun, challenge, and the desire to socialise remain the protagonists;
- **respect for the local area** in the choice of locations for points of sale, which must be made with attention to the surrounding socio-urban context and according to appropriate assessments of safety and distance from sensitive locations.

RESPONSIBLE GAMING CERTIFICATIONS



**G4 Certification (Online and Retail).** The Group's main online gaming platforms hold G4 (Global Gambling Guidance Group) certification, which is a global benchmark for the correct application of best practices related to responsible gaming according to globally accepted standards and protocols. This certification proves the existence and effective adoption of tools, policies, and procedures designed to ensure the highest level of security and protection for both customers and employees, and was also extended in 2024 to the directly managed retail network.

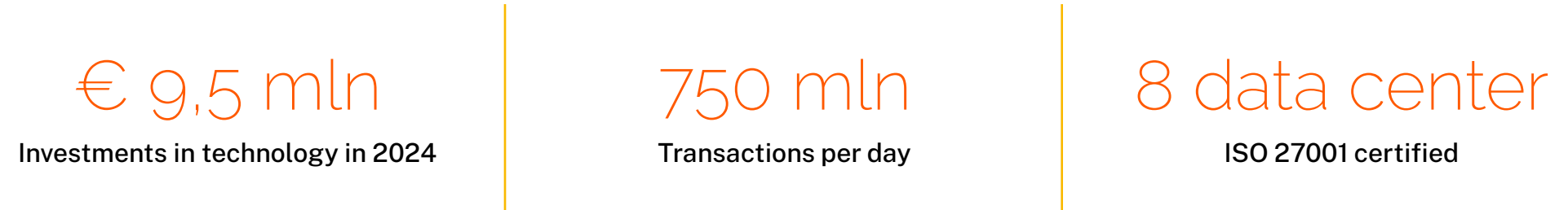


**First and second level WLA Certification (Online and Retail).** In 2024, through its company GBO Italy, the Group obtained certification for responsible gaming in the betting sector (online and retail) issued by the World Lottery Association (WLA), a global organisation representing the leading operators in the gaming sector in over 80 countries around the world and promoting the highest standards of social responsibility among its certified members.

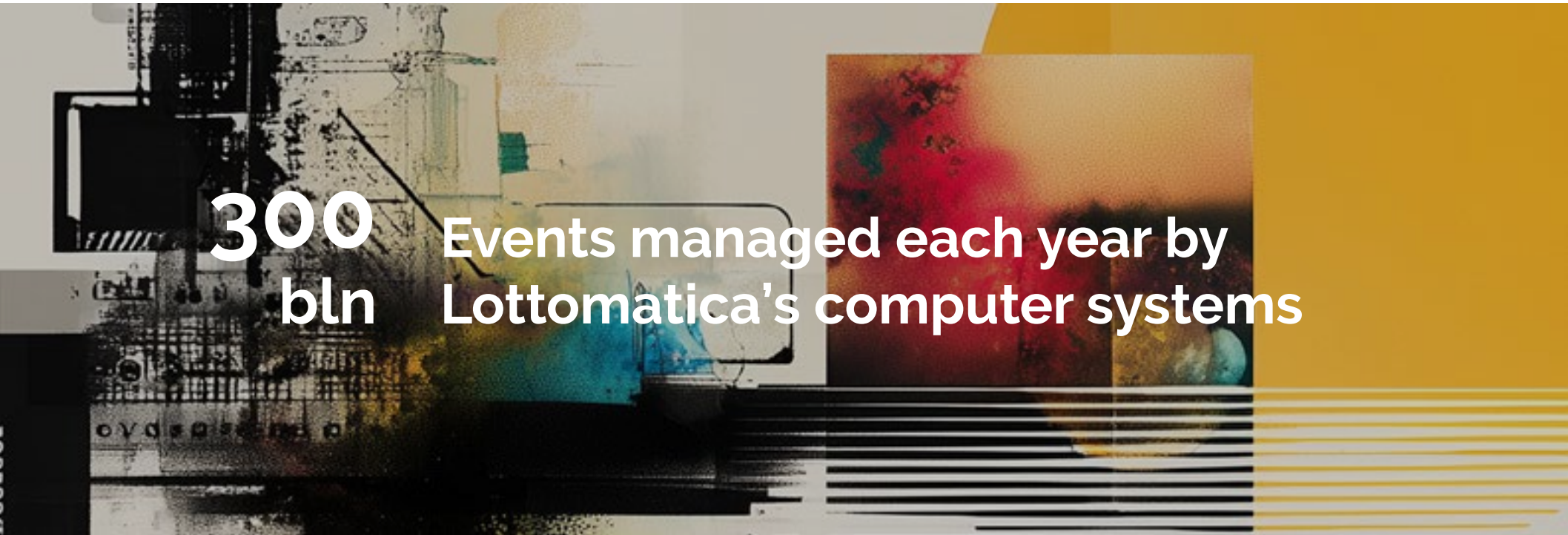


INNOVATION AND CONSUMER PROTECTION

Lottomatica considers innovation and technology to be fundamental elements to guarantee its customers and consumers an increasingly complete, engaging and, above all, secure offer. The Group's IT systems handle more than **750 million transactions per day**, through an infrastructure consisting of **eight ISO 27001-certified data centers** and **3,000 virtual servers**, on which more than **3 Terabytes of data** transit daily.



The Group is committed to ensuring the security of every operation carried out through its IT systems, managing an average of **over 300 billion** events per year relating to more than 8,000 attacks handled, over 5,000 malware, malicious URLs and exploits blocked, and more than 3,500 Intelligence reports.



DATA SECURITY, PRIVACY PROTECTION, AND CYBERSECURITY

Protection of personal data and privacy are crucial values for Lottomatica. In order to ensure compliance with the highest standards of conduct and all applicable regulations, the Group has established a robust **governance structure for the processing and protection of personal data and cybersecurity**, involving the main company departments with different responsibilities.



**Responsibility** for personal data protection lies with the **Legal Department** and includes the fulfilment of all obligations imposed by current legislation in order to ensure a high degree of compliance and accountability, both formal and substantive, in full compliance with the principles and provisions of Regulation (EU) 2016/679 (“GDPR”) and in accordance with the principles of privacy by design and privacy by default. Moreover, the **Control and Risk Committee** is responsible, among other things, for supervising privacy and data protection aspects.

The Group has also appointed an external and independent **Data Protection Officer**, who is responsible for supporting, assisting

and advising data controllers, processors, and persons in charge of processing in all activities relating to the management and processing of personal data, as well as acting as a point of contact for data subjects and ensuring cooperation with the Data Protection Authority and other competent authorities.

Lottomatica has also introduced a **cyclical Security Governance process**, which is used to define the Security Development Strategy and the related Security Development Plan, entrusting the Technology Security function with the task of ensuring the IT security of all Group companies, under the responsibility of the Technology Security Director, who reports directly to the Chief Operating Officer.

Lastly, since 2023, following the listing of Lottomatica Group S.p.A. on Euronext Milan, the **Control and Risk Committee** has also assumed supervisory responsibility for privacy and data security issues.

DATA PROTECTION POLICY

Lottomatica adopts a **Data Protection Policy** in order to define its governance and compliance structure with regard to personal data protection and to outline roles, responsibilities, and main operating procedures for processing and protecting personal data and ensuring that processing activities are carried out in compliance with the standards outlined by the GDPR. The Policy, which **applies to all companies and operations within the Group**, is addressed to all parties involved in the processing of data carried out by Lottomatica Group – including suppliers and third-party contractors, customers, employees and collaborators, candidates and investors – and is explicitly referred to in the Group’s General Terms and Conditions of Purchase, as well as in individual commercial agreements.

The Policy, which has been revised and **updated in response to changes in the legal, regulatory**, and organisational framework, commits the Group to **implementing adequate security measures** to ensure the confidentiality and integrity of the data processed, and **requires suppliers to implement protection measures consistent** with the Group’s standards.

 Read the **Data Protection Policy** and the **Data Protection Regulation** on [lottomaticagroup.com](https://lottomaticagroup.com)

In addition to independent audits that may be conducted by the Internal Audit department, the Data Controller and Data Processor may also arrange for periodic audits and checks to verify compliance with the provisions of the GDPR. Furthermore, the Operations & Technology department conducts an audit of the work of the System Administrators at least once a year to verify compliance with the measures required by current regulations. Lastly, at least once a year, Lottomatica Group reviews the users and authorisations for access to data on its systems.

Finally, it should be noted that the Legal department periodically conducts audits on suppliers/data processors in order to verify their compliance with their obligations. To this end, Lottomatica has adopted a specific procedure: PA CLA 15 – Management of personal data protection assessment activities on Lottomatica Group suppliers.

TRAINING IN DATA PRIVACY, PROTECTION, AND SECURITY

The Group has developed a specific **training programme** for **employees** about **data security**, through a **Security Awareness & Training platform** capable of delivering customised courses based on the level of knowledge and skills of individual resources and the standards required by individual structures.

Since 2022, a specific **Cyber Security Awareness** programme has been in place, with regular communications to employees aimed at **raising awareness among the entire workforce** of the importance of **IT security** and the **proper protection of data, information, networks**, and **systems**. The pro-

gramme involves the production and publication, via a dedicated platform, of multimedia clips, each focusing on a specific topic: from **privacy protection** to safe web browsing, including malware, spam, and fake news. In addition, phishing campaigns are conducted to maintain a high level of awareness on security and data protection issues.

Particular attention is paid to **training in data privacy and personal data protection**.

During the onboarding process at Lottomatica Group, every employee is required to attend a **mandatory training** session on personal data protection with the Group’s Privacy Officer.

In addition, **mandatory courses** are provided for all new Group employees and **periodic updates** for all resources involved in this area (100% of those concerned). In particular, the training consists of a course on privacy with a mandatory test and specific training for areas and departments identified annually. **The same training content is then regularly shared among the company’s employees** in order to remind them of the importance of the correct processing of personal data and to ensure compliance with the regulations and Lottomatica Group’s Data Protection Policy.

For contractors (consultants, business partners, etc.) and all suppliers who process sensitive data, there are also specific **mandatory training modules**, delivered via an e-learning platform.



Become Digital

Lottomatica’s focus on innovation and technology is also reflected in a series of **initiatives designed for the Group’s employees**, structured within **Become Digital**. Become Digital is a programme created to promote and facilitate the **development of a digital mindset** within the Group, open to the opportunities offered by innovation and digital transformation.

The main activities carried out in this area include, for example, training on innovation, technology and IT security delivered through the **Cyber Guru** platform, which in 2025 moved to a completely renewed digital environment enriched with interactive features. A further initiative was the extension of the collaboration with **Touch and Contact**, a start-up specialising in the creation of fully digital business cards: a partnership that reflects the Group’s commitment to digitalisation and involves Lottomatica’s top management and sales department.

Product and service safety

All gaming solutions offered by Lottomatica are carefully designed, developed and selected in accordance with the highest **international standards of reliability and safety for players**. The Group companies are committed to adopting organisational structures and technical, technological and IT tools aimed at protecting consumers, preventing the risks of developing legal problems related to gaming and ensuring the exclusion of minors.

The **safety of products and services** falls within the broader scope of commitment to responsible gaming, overseen by the Responsible Gaming department and the Responsible Gaming Committee, with the **responsibility** of

ensuring that the objectives set by the Responsible Gaming Programme are achieved, thus guaranteeing the maximum **safety of the products** offered by the Group and the full protection of consumers.

To ensure the **efficient management of incidents** and potential **corrective actions** to be implemented, Lottomatica establishes **specific intervention protocols and procedures for online gaming and the physical network**.

With regard to online gaming, the Group adopts cutting-edge technological solutions that include:

- artificial intelligence and predictive analysis tools, thanks to the “Safe Plai” system, to monitor gaming behaviour and intervene promptly in the event of intensive behaviour;
- systems for interacting with players who may show signs of pathological gambling, activating all available channels of contact;
- the use of behavioural sciences to analyse data on gaming habits, aimed at preventing the risk of pathological gaming.

Specific **intervention protocols** are also provided for by contact centre and sales network operators – trained in collaboration with CePID – with actions ranging from the administration of self-assessment tests to the provision of tools for greater control of gaming activity, to the invitation to complete self-exclusion for at-risk players and the provision of national and local contacts for specific assistance.

**Regular training on product and service safety** is carried out as part of responsible gaming training, which is mandatory for all Group employees and particularly in-depth for staff in more direct contact with players<sup>1</sup>.

The periodic audits required to maintain international responsible gaming certifications<sup>2</sup> (every 18 months for G4 and every 3 years for WLA) ensure the **monitoring of product and service safety performance**. In the context of responsible gaming certification audits, **emergency procedures** aimed at ensuring product safety and protecting players are also **regularly tested**.

In order to ensure maximum product safety, in 2025 the Group adopted a **secure software development Policy**. The Policy, which applies to all organisational structures involved in software development within Lottomatica Group companies, aims to support, through guidelines and best practices, the **development of secure IT applications** and prevent any security issues in the source code, while providing a useful tool for identifying possible vulnerabilities in the code.

Lastly, Lottomatica has always been at the forefront of the **fight against money laundering and terrorist financing** and has adopted specific procedures and systems to ensure compliance with legal requirements through cutting-edge solutions, including those based on artificial intelligence, which enable customer identification, data and document collection and storage, and the monitoring of suspicious transactions reported to the Financial Intelligence Unit.<sup>3</sup>

1 See “Training and resource awareness” for more information.  
2 See “Certifications of responsible gaming” for more information.  
3 See “Anti-money laundering” for more information.



Information security and privacy certifications

Lottomatica Group adopts an **Information Security Management System** (ISMS) according to the international standard **ISO 27001**. The Group's focus on privacy and personal data processing is also confirmed by the implementation of **ISO 27701** certification by two of the Group's main companies.

The ISO 27701 certification represents the extension of the ISO 27001 information security management standard to privacy, enabling a synergistic and integrated approach to information security and the GDPR, the European Data Protection Regulation.

| Certification                            | Certified companies                      |
|------------------------------------------|------------------------------------------|
| Information security<br>UNI EN ISO 27001 | Gamenet; GBO Italy; PWO; Totosi; Betflag |
| Information security<br>UNI EN ISO 27701 | Gamenet; GBO Italy; Totosi; Betflag      |



## ETHICS AND COMPLIANCE

Lottomatica is committed to operating according to the **highest standards of ethics and integrity**, respecting the individuals, communities and business partners with whom it works, through governance models and procedures that protect all stakeholders.

With the aim of preventing and **mitigating risks** and ensuring **compliance** with regulations on **ethical business conduct**, Lottomatica has an Internal Control System in place, consisting of the tools necessary to guide, manage and verify the Group's activities.

### 231 MODEL

Lottomatica Group adopts an **Organization, Management and Control Model pursuant to Legislative Decree No.231/200**, aimed at ensuring conditions of fairness and transparency in the conduct of business activities. The Model is based on a **structured and organic document system** (consisting of a series of policies, procedures, operating instruction,s and guidelines) as well as **control activities** that:

- identify areas potentially at risk of offences being committed;
- define an internal regulatory system aimed at preventing offences;
- are based on an organisational structure designed to inspire and monitor correct behaviour.

The following are considered recipients of the Model and, as such and within the scope of their specific competences, are required to be familiar with and comply with it:

- the representatives of the Shareholders;
- the members of the Board of Directors;
- the members of the Board of Statutory Auditors;
- employees and collaborators who have contractual relationships with the Company, for any reason, including occasional and/or temporary relationships;
- all those who have commercial and/or financial relationships of any kind with the Company.

All recipients are required to report to the Supervisory Board any violations of the Model or significant irregularities pursuant to the Decree, such as the commission of offences or the performance of acts conducive to their commission; conduct not in line with the rules of conduct set out in the Model itself; any shortcomings in the procedures in force; transactions of particular significance or presenting risk profiles such as to suggest a reasonable danger of offences being committed.

Reports of unlawful conduct must be detailed and based on precise and consistent facts, and may be made using the appropriate channels. The Supervisory Board is required to consider all reports received, including those received anonymously, provided they are sufficiently detailed, and to evaluate any consequent initiatives, listening to the author of the report and/or the person responsible for the alleged violation, if necessary, and providing written justification for any decisions taken.

Read the  
**231 Model** on  
Lottomaticagroup.com

### CODE OF ETHICS

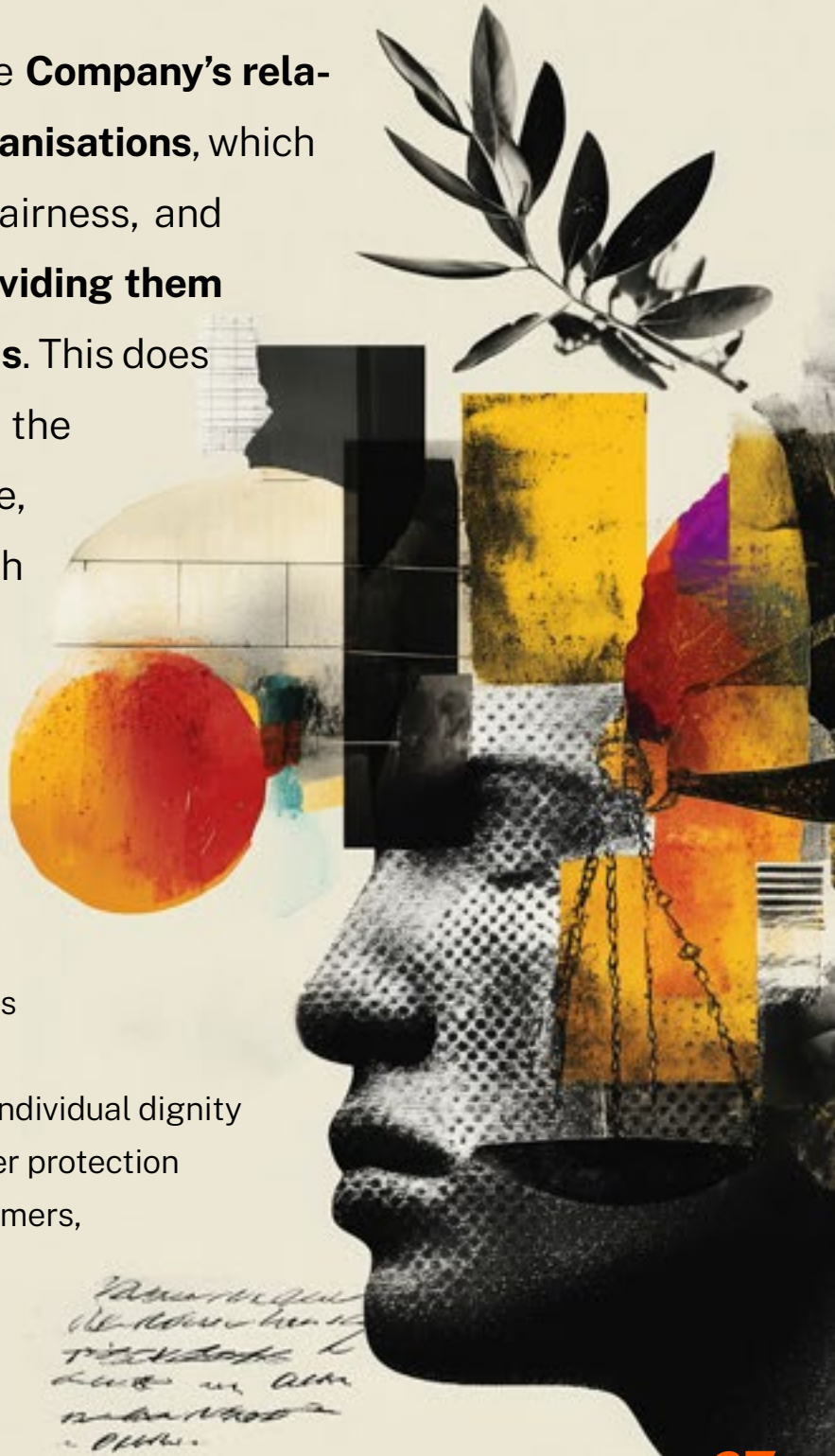
The **Code of Ethics** is an integral part of Model 231 and establishes the **fundamental values and principles for ethical business conduct**, with which all recipients must comply. These values and principles include: compliance with laws and regulations; protection of personal integrity; impartiality in relations with counterparties; the protection and promotion of human rights; the guarantee of working conditions that respect individual dignity; the promotion of responsible gaming and consumer protection; and external relations (public administration, customers, consultants, suppliers, agents, commercial, and/or financial partners, etc.).

In addition, the document regulates the **Company's relations with political and trade union organisations**, which must be based on transparency and fairness, and requires the Group to **refrain from providing them with any direct or indirect contributions**. This does not apply to solidarity initiatives, which the Group considers to be an essential value, playing an active and sensitive role with entities operating in the social field.

### PRINCIPLES AND VALUES OF LOTTOMATICA'S CODE OF ETHICS

- compliance with laws and regulations
- individual integrity protection
- impartiality in relationships with counterparties
- promotion and safeguard of human rights
- guarantee of working conditions that respect individual dignity
- promotion of responsible gaming and consumer protection
- external relations (public administration, customers, consultants, suppliers, agents, commercial, and/or financial partners, etc.)

Read the  
**Code of Ethics** on  
Lottomaticagroup.com



ANTI-BRIBERY & CORRUPTION

In accordance with the provisions of the Code of Ethics and in compliance with the principle of “zero tolerance”, Lottomatica is committed to combating corruption in all its forms and aims to promote a culture that discourages corrupt practices and facilitates the prevention and detection of such conduct.

In order to strengthen and consolidate this commitment, in addition to the Organisation, Management, and Control Model pursuant to ex. Legislative Decree 231/01, the Group adopts a **Management System for the prevention of corruption** –Anti Bribery & Corruption Management System –in accordance with the **ISO 37001:2016 standard**.

This system is governed by a specific **Anti-Bribery & Corruption Policy and Guidelines**, which defines the commitments in terms of corruption prevention, the rules of conduct to be followed, the procedures for reporting violations and the training and information activities carried out, as well as providing for appropriate checks on the reliability, reputation, and suitability of third parties with whom Lottomatica intends to establish business relationships.

 Read the **Anti-Bribery & Corruption Policy and Guidelines** on [Lottomaticagroup.com](https://lottomaticagroup.com)

| Certification                                                          | Certified companies                                                                      |
|------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| Management System for the Prevention of Corruption<br>UNI EN ISO 37001 | Lottomatica Group; Betflag; GBO Italy; Gamenet;<br>Lottomatica Videlot Rete; PWO; Totosi |

ANTI-MONEY LAUNDERING

Lottomatica Group adopts a “**zero tolerance**” **approach** towards individuals who violate **Anti-money laundering and Counter-terrorist financing** (AML & CTF) provisions. In this regard, the Group adopts an **AML & CTF Policy** that defines the roles, responsibilities, requirements, and operating procedures aimed at **preventing and managing the risk** associated with the use of the financial system for the purpose of laundering the proceeds of criminal activities and financing terrorism.

The **Group Regulatory Compliance, AML & Quality function** is an independent organizational unit that ensures the management and coordination of shared resources within the Group for the purposes of Anti-Money Laundering and Counter-Terrorist Financing, including through the issuance of **standards, guidelines, and procedures relating to AML/CTF**.

The Group has established **robust customer verification and monitoring controls** through procedures and systems in **compliance with privacy regulation** and are based on the **Risk Based Approach** principle. Appropriate **screening tools** also ensure that the Group does not establish relationships or provide any services to individuals and entities subject to national and international sanctions.

Among the initiatives implemented in this area is the customer identification system at VLT, betting, and bingo outlets called **DAISY** (Data Identification System), which allows for a series of real-time checks, including through **integration with specific databases**, and the dematerialization of **identification forms**.

Employees and third parties are adequately **trained and made aware of ML/TF risks** to which they are exposed based on their roles, and the Group provides specific communication channels for **reporting unacceptable behavior**. If an employee becomes aware of corrupt behavior, money laundering, or other potential abuse of internal procedures or the Code of Ethics, they are required to report this immediately through the **appropriate whistleblowing channel**.

 Read the **AML & CTF Policy** on [Lottomaticagroup.com](https://lottomaticagroup.com)

WHISTLEBLOWING

In line with the provisions of 231 Model and in compliance with regulatory provisions, Lottomatica Group has defined a **system aimed at managing the reporting of offences**. This system, by means of the digital platform “EthicsPoint Platform” (available both on the company intranet and on the institutional website) and a dedicated telephone channel, available 24 hours a day, ensures the confidentiality and privacy of the data of the reporting parties and of the reported persons.

The **whistleblowing management system** is governed by a specific procedure, published on the institutional website and applicable to all Group companies. The procedure, which also includes among its recipients those who supply goods or services or carry out work on behalf of Group companies, encourages those involved to report without delay, in good faith and on the basis of reasonable factual evidence, any potential violations, conduct or practices that do not comply with the laws applicable to the Group and the provisions of the Code of Ethics, 231 Model, and/or applicable internal procedures and guidelines.

 Read the **Reports Management Procedure** on [Lottomaticagroup.com](https://lottomaticagroup.com)

RESPONSIBILITY, MONITORING, AND TRAINING ON BUSINESS ETHICS ISSUES

The **responsibility** for approving and adopting the Control Model, the Code of Ethics, and all Group policies and procedures **relating to business ethics issues** is entrusted to the **Board of Directors of Lottomatica Group**, which also ensures that these documents are disseminated so that all directly or indirectly controlled companies formally adopt them.

Business ethics issues are also overseen by the **Risk, Ethics & Compliance** Department which, among other things, monitors the adequacy and effectiveness of the internal control and risk management system, reporting periodically on its activities, on the methods by which risk management is conducted, as well as on compliance with the plans established for their mitigation, to the Chairpersons of the Board of Statutory Auditors, the Control and Risk Committee, and the Board of Direc-

tors. The **Risk, Ethics & Compliance** Department is also responsible for examining and **investigating** reports received through the whistleblowing system and assessing the possible adoption of **corrective actions** and measures, compiling them in a summary and detailed report to be presented annually to the Board of Directors.

The **Internal Audit** Department (formerly Internal Audit & GRC–Anti-Bribery & Corruption Department) is responsible for preparing the annual **Group Audit Plan**, which is subsequently approved by the Board of Directors and **defined according to a risk-based approach** in order to identify the corporate processes considered most at risk. The 2024 Audit Plan is divided into four areas of intervention: **Audit** (which also includes audits aimed at detecting any non-compliance and unethical conduct), **Anti-Bribery & Corruption, Compliance**, and **Risk Management**.

In order to reinforce the corporate culture on these issues and **reduce exposure to unethical opportunities**, 231 Model, the Code of Ethics, the Anti-Bribery and Corruption Policy and Guidelines, and the whistleblowing procedure are the subject of **specific training courses** for all employees, both in person and via e-learning. They are **published online** on the Group’s main websites, on the company intranet, and on portals dedicated to partners and commercial suppliers, and are **explicitly referred to in every contract**.

| Anti-bribery & corruption training                             | 2024              |                   |                   |                   |
|----------------------------------------------------------------|-------------------|-------------------|-------------------|-------------------|
|                                                                | Functions at risk | Managers          | OADC              | Other own workers |
| Total training recipients                                      | 28                | 59                | 40                | 2,078             |
| Frequency                                                      | Every three years | Every three years | Every three years | Every three years |
| Topics covered                                                 |                   |                   |                   |                   |
| Anti-corruption management system in accordance with ISO 37001 | x                 | x                 | x                 | x                 |
| 231 Model                                                      | x                 | x                 | x                 | x                 |
| Code of Ethics                                                 | x                 | x                 | x                 | x                 |

INTEGRATED MANAGEMENT SYSTEM FOR QUALITY, SAFETY, AND THE ENVIRONMENT

Lottomatica Group and the Group's concessionary companies adopt an **Integrated Management System for Quality, Safety, and Environment (IMS)**, which brings together management systems for **quality** (ISO 9001, **covering around 83% of the Group's companies**), **safety** (ISO 45001), and the **environment** (ISO 14001, **covering over 80% of the Group's operations**).

Read the **Quality and Safety Policy** on [Lottomaticagroup.com](#)

This organizational model – governed by a specific **Policy** – allows the Group to implement an effective process control system aimed at preventing and managing risks, ensuring the health and safety of workers and end customer satisfaction, and reducing environmental impact, while consolidating a corporate culture focused on quality, safety, and environmental protection.

| Certification                                       | Certified companies                                                                                                                                                                                                    | % of coverage         |
|-----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| Quality management system<br>UNI EN ISO 9001        | Lottomatica Group; Ares; Bakoo; Betflag; Big Easy; Big Easy Bingo; Distante; Gamenet; GBO Italy; Gnetwork; Ima; Jolly Group; Lottomatica Videolot Rete; Marim; PWO; Rete Gioco Italia; Ricreativo B; Tecno-Mar; Totosì | 83% of the companies  |
| Workers' health and safety<br>UNI EN ISO 45001      | Lottomatica Group; Betflag; Gamenet; GBO Italy; Lottomatica Videolot Rete; PWO; Totosì                                                                                                                                 |                       |
| Environmental management system<br>UNI EN ISO 14001 | Lottomatica Group; Betflag; Big Easy; Big Easy Bingo; Gamenet; GBO Italy; Jolly Group; Lottomatica Videolot Rete; Marim; PWO; Totosì                                                                                   | 80% of the activities |

LEGALITY RATING ★★ ★

Some of the main Lottomatica Group's companies (Lottomatica Group S.p.A., Gamenet S.p.A., and GBO Italy S.p.A.) received the **Legality Rating** from the Italian Antitrust Authority (AGCM), obtaining the **maximum rating of 3 stars**.

The rating certifies compliance with a series of voluntary regulatory and extra-regulatory requirements, highlighting the high standards of legality and transparency adopted by companies, which can thus obtain an objective assessment of the degree of attention paid to the conduct of business in relation to a series of issues: from corporate risk management to corporate social responsibility, from sustainability to the prevention of corruption, and finally to respect for legality, attention to customer relations and the traceability of payments.

LOTTOMATICA'S TAX CONTRIBUTIONS

The public gaming sector authorized by the Customs and Monopolies Agency, managed through carefully selected qualified concessionaires and operators, is a **significant source of tax revenue for the Italian State**, to be used **for the benefit of the community**: the tax revenue generated by the entire sector is, in fact, approximately **Euro 12 billion per year**.

Fulfilling tax obligations and paying taxes in a timely and transparent manner, adopting a prudent approach in order to manage tax risk responsibly, has always been one of Lottomatica's priorities. As Italy's largest public gaming operator, Lottomatica therefore plays a key role in **achieving important public interest objectives** thanks to its significant contribution to tax revenues and the Italian state. The Group's tax contribution amounts to approximately **Euro 3 billion per year**, most of which comes from taxes paid in the course of its public gaming management activities.

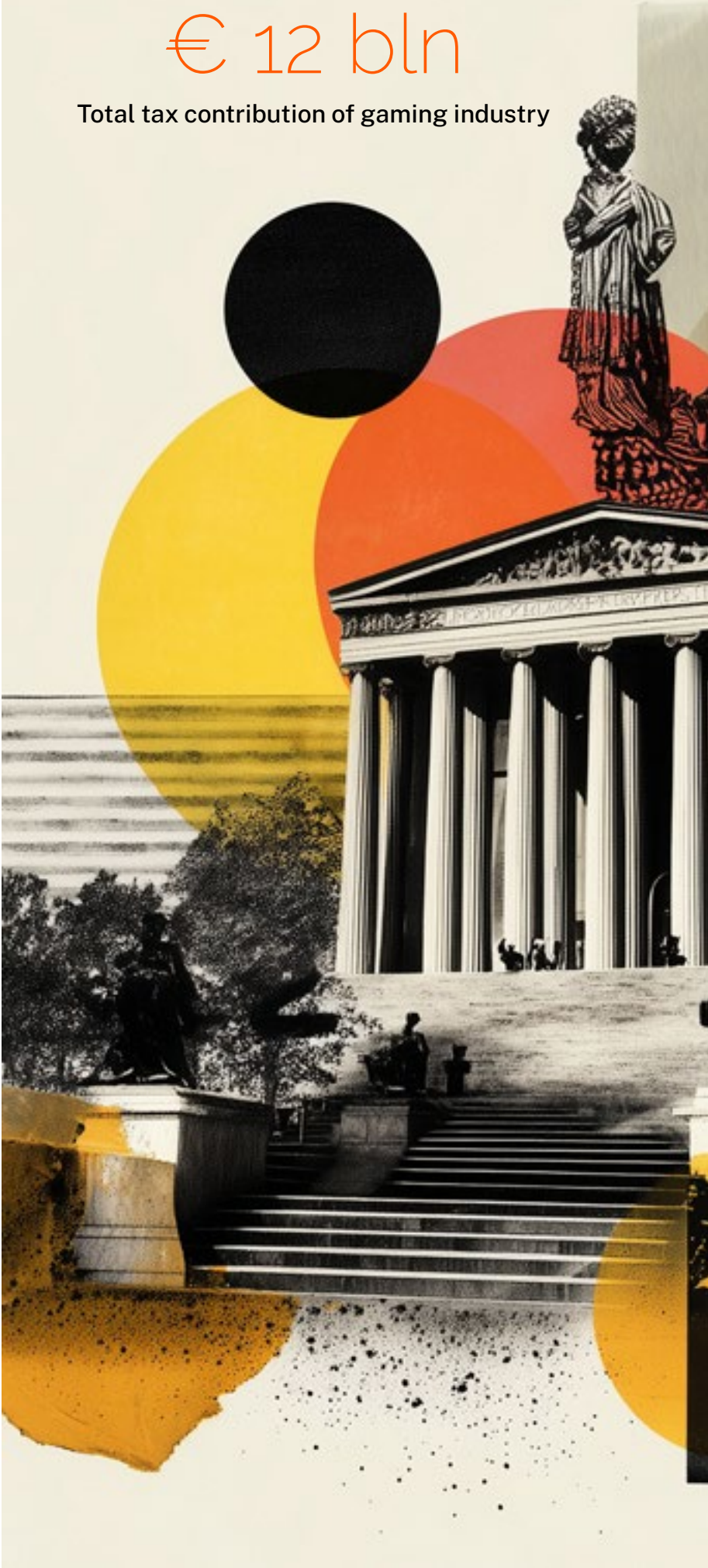
| Reporting of fiscal information                                         | 2024          |         |        |            |           |              |
|-------------------------------------------------------------------------|---------------|---------|--------|------------|-----------|--------------|
|                                                                         | Italy         | UK      | USA    | Serbia     | Austria   | Malta        |
| Employees                                                               | 2,252         | -       | -      | 385        | 1         | 29           |
| Revenues from sales to third parties (€)                                | 2,044,036,018 | 236,289 | -      | 70,401     | -         | 98           |
| Revenues from intra-group transactions with other tax jurisdictions (€) | 2,420         | -       | -      | 21,365,495 | 539,480   | 23,025,838   |
| Pre-tax profit / (loss) (€)                                             | 246,230,817   | 1,622   | 58,913 | 1,589,065  | (382,715) | (33,325,115) |
| Tangible assets other than cash and cash equivalents (€)                | 148,146,713   | -       | -      | 458,392    | 25,873    | 966,776      |
| Income taxes paid on a cash basis (€)                                   | 81,353,376    | 2,728   | -      | 309,000    | -         | -            |
| Corporate income tax accrued on profits / (losses) (€)                  | 89,279,845    | 405     | 586    | 281,765    | 2,145     | -            |

€ 3 bln

Tax contribution of Lottomatica

€ 12 bln

Total tax contribution of gaming industry



# PEOPLE WE CARE ABOUT PEOPLE

*Lottomatica adopts an integrated approach, aimed at both mitigating risks related to workforce management and promoting new opportunities for professional growth. This approach is strategically grounded in the Group's People Strategy, which is committed to valuing and nurturing the talent of its resources, promoting individual and organizational well-being, and integrating the principles of diversity and inclusion into the corporate culture to foster a healthy and safe work environment where everyone can feel fully fulfilled and motivated to contribute to common goals.*



# PEOPLE WE CARE ABOUT PEOPLE

## PEOPLE AT THE CORE

The centrality of **people** is a key element of Lottomatica's identity. The Group is committed to valuing and cultivating the talent of its resources, promoting individual and organizational well-being, and integrating the principles of diversity and inclusion into the corporate culture to foster a healthy and safe working environment in which everyone can feel fully fulfilled and motivated to contribute to common goals.

The Group guarantees **respect for individual rights** and **freedoms**, promoting the right to freedom of association and union expression, and combating all forms of abuse or discrimination against individuals engaged in organizing or representing workers.

+38.6% employees in 2024

### STAFF COMPOSITION AND TURNOVER

In 2024, the Group's strong growth, combined with talent attraction activities, led to the **addition of 743 new employees through organic growth and M&A activities** (+38.6% compared to 2023), for a total of **2,667 employees** as of December 31, 2024. Approximately 92% of the workforce is employed on permanent contracts. Finally, in line with the previous year, 35% of employees are women, confirming the high level of IT specialization that characterizes the Group's operations.

As for the **turnover rate**, calculated as the ratio between departures and the total number of employees at the end of the reference year, the figure for 2024 was 14.3%. Finally, looking at voluntary resignations alone, the attrition rate in 2024 was 6.67%, below the national average, whereas in 2023 it was 6%.

| Employee type                       | 2024   |
|-------------------------------------|--------|
| Number of employees                 | 2,667  |
| Number of terminated employees      | 382    |
| Employee turnover rate <sup>1</sup> | 14.32% |

<sup>1</sup> The calculation of the turnover rate considers not only employees who left the workplace voluntarily, but also those who left due to dismissal, retirement and death.



WORKERS AND HUMAN RIGHTS PROTECTION

The Group adopted a specific **Protection and Safeguarding of Human Rights Policy**, inspired by the Declaration on Fundamental Principles and Rights at Work and in line with the fundamental conventions of the **International Labour Organisation (ILO)**.

This Policy – which incorporates the Principle of Non-Discrimination, the Policy on Freedom of Association, the Policy on Working Hours, and the Policy on Smart Working –strengthens, in terms of responsibility and controls, the safeguards already in place within the organizational model and the company’s internal control system, defining within a dedicated framework the methods aimed at ensuring the protection of human and workers’ rights.

Read the **Protection and Safeguarding of Human Rights Policy** on [Lottomaticagroup.com](https://lottomaticagroup.com)



Working Hours Policy

The Group’s Human Rights Policy incorporates the **Working Hours Policy**, updated at the beginning of 2025, which confirms Lottomatica’s commitment to ensuring working hours that allow employees to balance their work, family, and leisure commitments, promoting flexible working arrangements and smart working.

This policy reinforces the commitments established in the **internal working hours management procedures** issued, in line with the standards set out in the national collective labor agreements applied by the Group, to regulate aspects such as: **daily and weekly working hours**, attendance recording, overtime, use of vacation and leave, notification of absences due to illness, accident, maternity, and parental leave, etc.

Collective bargaining and social dialogue

As of December 31, 2024, approximately **85%** of the Group’s **employees** are covered by **national collective agreements**, and more than 82% are represented by employee representative bodies.

| Collective bargaining and social dialogue                       | 2024   |
|-----------------------------------------------------------------|--------|
| Number of employees covered by collective bargaining agreements | 2,253  |
| Number of employees covered by trade unions                     | 2,193  |
| Number of employees                                             | 2,667  |
| Percentage of employees covered by collective agreements        | 84.48% |
| Social dialogue coverage                                        | 82.23% |

92% of employees benefited from smart working in 2024



*Lottomatica is committed to working hours that allow employees to fulfill their work, family, and leisure commitments with equal effectiveness. With a view to improving work–life balance, Lottomatica supports employees who need flexible working hours and promotes smart working projects, as provided for in company policy and second–level agreements.*

*Lottomatica’s general commitment to working hours*

PEOPLE DEVELOPMENT  
AND EMPOWERMENT

**People empowerment** is a **cornerstone** of the Group’s strategy, which **promotes** environments conducive to **skills development** and the full **realization** of **individual potential**.

PEOPLE STRATEGY

In defining its workforce strategy, Lottomatica has adopted an **integrated approach** aimed not only at mitigating the risks associated with workforce management, but also at seizing new professional development opportunities for its people. In this light, Lottomatica’s **People Strategy** was launched in 2022 and subsequently updated in 2025 as part of a broader project to evolve the company’s DNA. The People Strategy is a **medium- to long-term program** that, starting from the corporate DNA, defines the direction of **development for people** and the **Organization** in terms of **culture, tools, systems, and processes**, and in relation to the company’s sustainable growth objectives.



Strategy is articulated in **three** well-defined **drivers**.

- People Growth & Development
- People Excellence & High Performance
- People Engagement & Total Reward



People Growth and Development

DEVELOPMENT

The Group implements **growth programs** aimed at recognizing, enhancing, and cultivating the potential of its people, offering stimulation, inspiration, and concrete tools for development.

The main **initiatives** in this area are **monitored** through **specific KPIs** and include:



- **StepUp**, a development path for high-potential professionals, aimed at cultivating and developing participants’ skills; creating a distinctive leadership style in line with Lottomatica’s competency model; building personalized paths to promote professional growth and career aspirations; improving retention. A new edition of the program is also underway in 2025, and the Group, as part of its **human capital development targets**, aims to retain at least 90% of the people involved in these development programs.
- **Women at the Top**, an initiative aimed at female managers and focused on promoting female talent, with the aim of enhancing the skills of participants and supporting them in their professional growth and leadership development.
- **Starting Neo Dirigenti**, a development program for new managers that accelerates their integration into the role and enhances essential strategic skills such as motivational leadership, agility in change, speed of decision-making, and long-term vision.
- **Training courses for new managers**, focused on developing managerial skills and enhancing the abilities needed to perform their role effectively.
- **Management Revolution**, a consortium program promoted by ELIS and aimed at middle management, with the aim of providing managers with concrete tools and models to understand, interpret, and enhance the transformations taking place, both within organizations and in the external context.
- **Sustainability Mentorship**, an innovative program focused on sustainability issues aimed at: stimulating awareness, inspiration, and innovation in sustainability; promoting leadership oriented towards “giving back”, generating a positive impact for the organization and the external context; creating a collaborative and inter-company environment to foster sustainable evolution at 360°.

- **SDGs Leaders**, an inter-company project based on sharing experiences and knowledge as a strategic lever to promote structured reflection on the main developments underway. The program addresses cutting-edge topics such as Communication, Procurement, Sustainability, and Digital & Tech, stimulating discussion between companies on common challenges and best practices.

LEARNING

**Professional training** and the **development of new skills** are important strategic keys to the success of the Group, which constantly invests in these areas, supporting employees in their growth path with the help of tools such as the internal assessment platform MyEvaluation – a tool developed internally and tailored to the specific characteristics of the organization and each business function – which allows the Group’s resources to have access to annual assessment processes and targeted, personalized development paths for the development of key skills and virtuous behaviors.

As part of its **human capital development targets**, the Group aims to **increase** the **number of training hours** provided by at least **5%** in 2025 compared to 2024.

The training initiatives include:

- **goFluent** for language learning;
- **Learning Square di HRC Community** for soft and hard skills development;
- **Younicity**, in collaboration with Valore D, to promote diversity and inclusion;
- **Cyber Guru**, for training on innovation, technology, and cybersecurity.

All courses offered by these platforms are accessible to all employees at any time. In 2024, a total of 30,474 hours of training were provided, with an increase of 37% compared to 2023.





## People Excellence & High Performance

### PERFORMANCE MANAGEMENT

Through the MyEvaluation platform, the Group conducts a **personnel assessment process** every two years to identify the strategic skills to be developed in line with organizational objectives and corporate values, promoting virtuous behaviors that go beyond mere compliance with the role. In addition, Lottomatica conducts specific assessments of untapped potential, based on its own competency and leadership model, with the aim of evaluating the potential of its people and planning consistent growth and development paths.

### HR DASHBOARD

The HR Dashboard is a fundamental tool for the constant **monitoring and improvement of** HR and organizational **KPIs**, allowing the collection and analysis of all information that may have a direct or indirect impact on staff and the organization.

**The main KRIs (Key Risk Indicators) related to people management** (e.g., % impact of strikes, accidents, absenteeism, days needed to replace a key resource) **are monitored and measured every 6 months**. The resulting report is discussed by the heads of HR and Risk, Ethics & Compliance, and then brought to the attention of the Board of Directors. To date, **no significant risks have emerged** from monitoring.

## People Engagement & Total Reward

### ONBOARDING JOURNEY

The onboarding of new employees is carried out in accordance with the principles established in the Code of Ethics, ensuring **equal treatment** based on the individual abilities of candidates, **fairness**, and basing selection exclusively on **criteria of professionalism and competence**.

The **Onboarding Journey** is the process that accompanies new hires during their first period in the company, engaging them and making them feel part of the team from their first day in the company. The journey provides the tools necessary to navigate the new organizational context and is divided into several phases, such as: the “Personal Onboarding Day”, the “Monthly Onboarding Day”, “Coffee with HR”, and the “On Field Experience”, to get to know the Group’s retail network in person.

### PEOPLE SURVEY

The Group actively promotes employee **engagement and listening** through instruments that foster dialogue and participation and continuous feedback collection, such as an annual “Pulse Survey”, the “Onboarding Survey”, and the “Exit Interview”.

### COMP&BEN – ROLE WEIGHTING

In order to adequately value the various organizational positions, Lottomatica adopts the **Mercer IPE international evaluation system**, which assigns a specific weight to each role based on qualitative and quantitative criteria, thus making the associated remuneration easily comparable with that of similar positions, both within the company and outside it.

### FAIR PAY

Lottomatica ensures remuneration in line with the minimum requirements established by collective agreements and relevant regulations, actively promoting policies to prevent and combat the gender gap. For this reason, since 2023, the Group has been pursuing the **Fair Pay** project, which aims to guarantee all Lottomatica employees a **minimum wage threshold** in line with the cost of living.

REMUNERATION POLICIES

Lottomatica Group adopts **short-term and long-term incentive systems** based on the achievement of predefined individual and business objectives.

In particular, the Group’s **short-term incentive system** (STI) is designed to attract, motivate, and reward people according to principles of **fairness, transparency, and correctness**, ensuring the correct correlation between results achieved and sustainability, while also ensuring the alignment of the interests of shareholders, management, and other stakeholders.

The main **short-term incentive system (STI)** adopted by Lottomatica is **managerial (MBO)** and provides, for the entire beneficiary population, individual and collective objectives linked not only to financial and operational targets, but also to ESG factors.

The Group also adopts a **long-term incentive (LTI) system** structured as a stock option plan and linked to financial, business, and ESG targets. In addition, there is a further two-year lock-up mechanism, for a **total duration of five years**, aimed at strengthening retention and promoting alignment with the company’s strategic objectives.

**Sustainability performance metrics** have been integrated into both the STI and LTI programs:

- in the STI plan, ESG KPIs are applied to all employees who have an MBO and represent a significant part of the target sheet, with an average weight of 15% of variable remuneration, which in the case of top management reaches 20%. The objectives of the STI plan are listed below and are published in the Remuneration Policy;

|                                                                                                                                                                                                                                                                        | Performance range |        |         |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|--------|---------|
|                                                                                                                                                                                                                                                                        | Minimum           | Target | Maximum |
| Zero Scope 2 emissions (reference period 01/01/2025: non-sharing company locations in Italy in low-voltage direct gaming halls). KPI: reduction compared to Scope 2 emissions in 2024.                                                                                 | 90%               | 95%    | >95%    |
| Renewal of ESG certifications: ISO 37001 (Anti-bribery); ISO 27001 (Data Protection); G4 Online (Responsible Gaming); ISO 45001 (Health and Safety); UNI/PDR 125:2022 (Gender Equality); ISO 14001 (Environment). KPI: renewal of certifications by December 31, 2025. | On/off            |        |         |
| Improve pay equity by reducing the gender pay gap by 2024, with reference to the same scope.                                                                                                                                                                           | -0.3pp            | -0.5pp | -0.8pp  |

- in the LTI plan, the achievement of ESG objectives directly affects the amount of stock options awarded, thanks to a bonus/malus mechanism of +/-10%, determined on the basis of the Sustainalytics ESG rating in the Casinos and Gaming sub-industry.

The awards and targets of the STI and LTI programs, **including those linked to sustainability metrics**, are reported in the **Report on remuneration policy and compensation paid**, which the Group publishes annually.

Read the **Remunerartion Policy** on [Lottomaticagroup.com](https://lottomaticagroup.com)



## DIVERSITY, INCLUSION, AND EQUAL OPPORTUNITIES

The inclusion and enhancement of each person's uniqueness are an integral part of Lottomatica's DNA. The company is committed to creating a work environment where everyone can feel completely fulfilled and motivated to contribute to the achievement of common goals.

To reinforce the commitments already enshrined in the Code of Ethics, the Group adopts a **Diversity and Inclusion Policy** aimed at eliminating all forms of discrimination and promoting equal opportunities and fair treatment for all, with specific measures for the most vulnerable categories. These commitments also apply to suppliers and are explicitly included in the **Supplier Code of Conduct**.

Gender diversity and equality are also specifically recognized, protected, and promoted by the **Gender Equality Policy**. To further safeguard the well-being of all people who work within the organization, collaborate with it, or are part of the community in which it operates, the Group adopts a **Protection and Safeguarding of Human Rights Policy**.



Read the **Diversity and Inclusion Policy** on [Lottomaticagroup.com](https://lottomaticagroup.com)



Read the **Gender Equality Policy** on [Lottomaticagroup.com](https://lottomaticagroup.com)

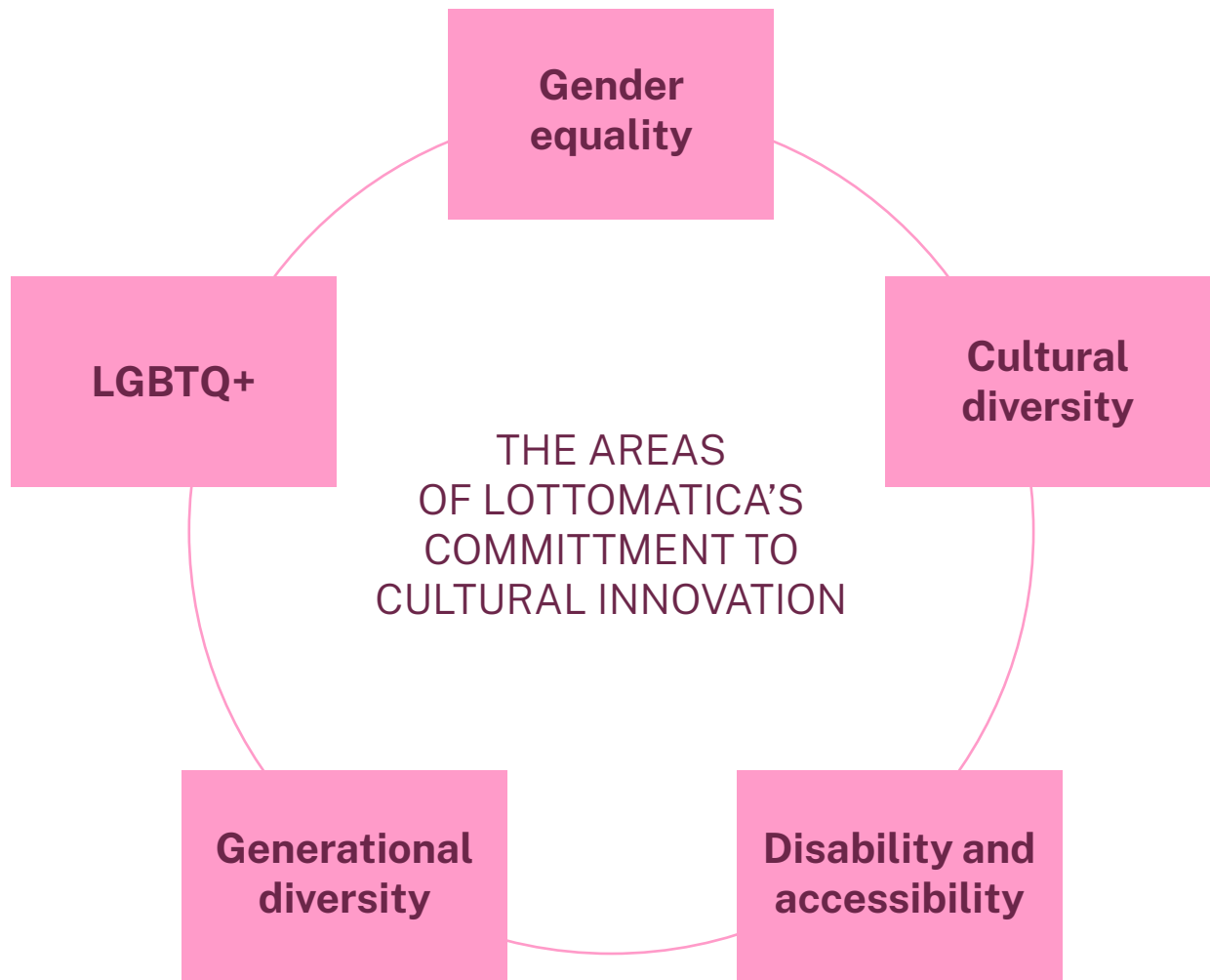


Read the **Protection and Safeguarding of Human Rights Policy** on [Lottomaticagroup.com](https://lottomaticagroup.com)

## CULTURAL INNOVATION PROGRAM



The formal commitments established by the policies mentioned above are embodied in the **Become Younique** program and focus on five specific areas of commitment, overseen by a **dedicated governance structure**. Lottomatica has established a **Cultural Innovation Committee** and a **Cultural Innovation Manager**, supported by five **thematic working groups** composed of over 70 colleagues who help develop the Group's Become Younique Path. These are complemented by the **Gender Equality Committee**, which is responsible for supporting the definition of the Gender Equality Policy and ensuring inclusion, integration, and equal opportunities within the organization.



The main initiatives carried out in these areas include:

- **training and awareness** projects such as “Women Empowerment”, “Unconscious Gender Bias”, and courses on the importance of inclusive language and gender equality, developed in collaboration with partners such as Valore D and Parole O\_Stili;
- programs to **promote female talent** such as “Women at the Top”, with the aim of supporting the personal and professional growth of female managers and fostering increasingly inclusive leadership;
- **partnerships and collaborations** with associations active in various areas of diversity, such as the Italian Down Syndrome Association or the Mario Mieli Homosexual Culture Club;
- policies aimed at ensuring **equal access to rights and institutions**, for example, with regard to parental leave, extending the same conditions to same-sex couples as those provided for opposite-sex couples.

With particular reference to gender-based violence, Lottomatica, in line with its Code of Ethics and in order to maintain a high level of attention and oversight of inclusion processes, has implemented a **protocol on harassment and violence in the workplace**.



TARGET

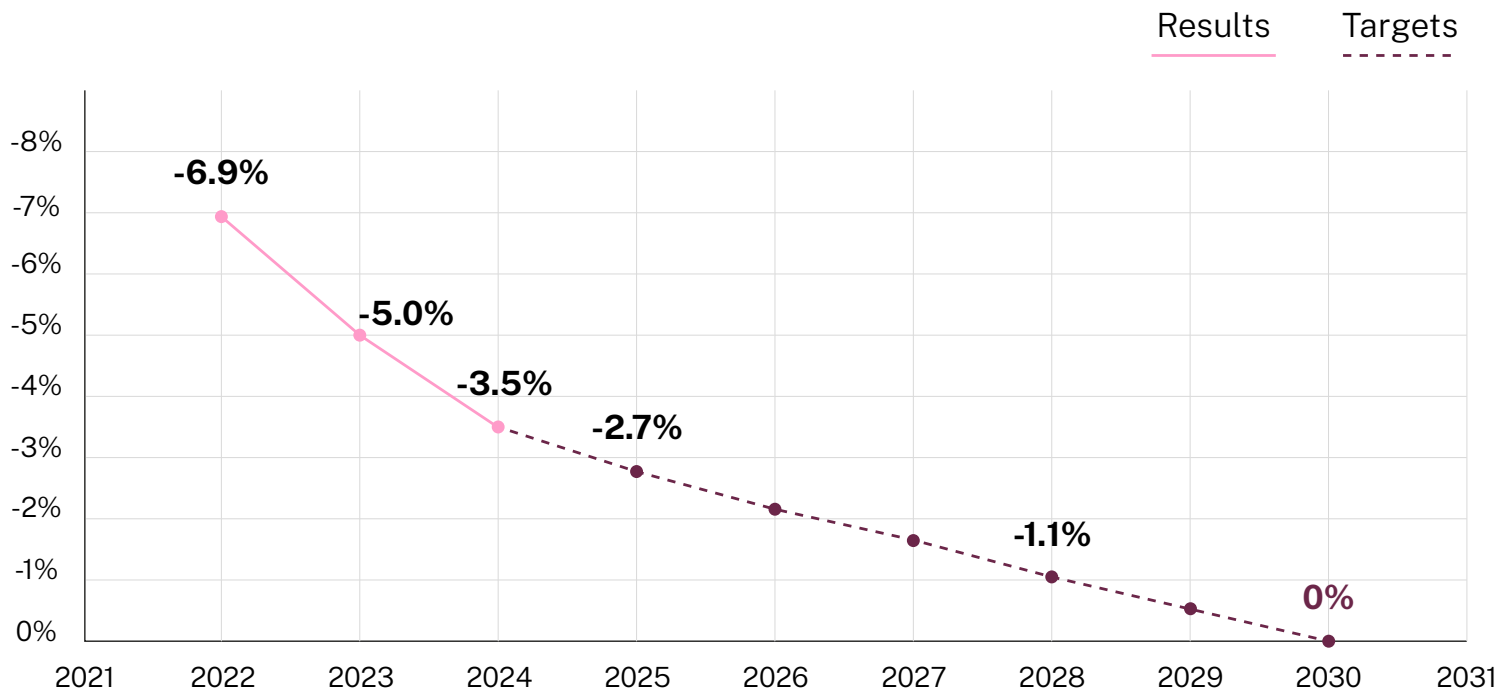
2030 zero gender pay gap target  
-3.5% in 2024

GENDER DIVERSITY

In 2024, Lottomatica Group had **940 women** among its employees, accounting for approximately **35% of the workforce**, while 55% of the parent company’s Board of Directors was made up of female members (6 out of 11 in total). **The gender pay gap is monitored on a quarterly basis** through the HR Dashboard, in order to observe trends and take action.

The Group is pursuing the goal of **eliminating the gender pay gap by 2030** through specific **initiatives aimed at closing the pay gap**, both overall and for individual groups of workers. Thanks to this commitment, **the Group’s pay gap is steadily decreasing**: excluding the management team, the figure was -6.9% in 2022, -5% in 2023, and **-3.5% in 2024**, in line with Italian market pay data. In order to achieve the target of 0% in 2030, the Group has set itself the following **intermediate targets**: 2025 -2.7%; 2028 -1.1%; 2030 0%.

GENDER PAY GAP MONITORING



In order to measure the gender pay gap, the Group adopts a calculation method based on position classes which, in line with the Mercer IPE international evaluation system, assigns different weights to different organizational positions according to qualitative and quantitative criteria and aggregates the company population into homogeneous bands in terms of role and organizational weight, thus allowing for meaningful and consistent data analysis. This methodology is used both to monitor the gender pay gap on a quarterly basis and to ensure objective remuneration linked solely to the role held, thus rendering the starting salaries for a given role irrelevant and not subject to negotiation: the data used as a benchmark is linked to the position classes themselves and used as a salary range during the selection phase.

According to the ESRS standards methodology, which calculates the gender pay gap based on the average gross hourly pay of all male and female employees, the **average value of the overall gender pay gap** in 2024 was 13%, as was the **median value**.

| Average gross hourly remuneration |     |
|-----------------------------------|-----|
| Gender pay gap (mean)             | 13% |
| Gender pay gap (median)           | 13% |

# HEALTH AND SAFETY, WELFARE AND WELL-BEING

Lottomatica is committed to creating a work environment that complies with the highest health and safety standards, free from discrimination or conditioning, ensuring the right **balance between work and private life** and **promoting the well-being of employees and their families**.

The Group adopts a **Policy on the protection and safeguarding of human rights**, which establishes **principles** and **guidelines** to ensure a **fair and respectful working environment**

Read the **Protection and Safeguarding of Human Rights Policy** on [Lottomaticagroup.com](https://lottomaticagroup.com)

and integrates the Policy on freedom of association, the Principle of non-discrimination, and the Policy on Working Hours, accompanied by an appropriate Policy on Smart Working.

## HEALTH AND SAFETY

In line with the provisions of the Code of Ethics and the current provisions of Legislative Decree 81/2008, Lottomatica is committed to creating a safe working environment (including the Company's locations open to the public), ensuring the adoption of all necessary prevention and protection measures to avoid, or at least minimize, any risk to health or physical safety and optimizing working conditions through the choice of suitable equipment and appropriate working methods.

The Group is aware that **health and safety protection** requires not only adequate training and the presence of appropriate tools and devices in the workplace, but also the adoption of an appropriate management system aimed at improving prevention policies and effectively combating accidents and occupational diseases. For this reason, the Group's major companies are certified according to the **ISO 45001 standard – Occupational Health and Safety**

**Management System**, an international standard that certifies Lottomatica's commitment and proactivity in ensuring a safe and healthy working environment and in preventing accidents and health problems.

The Group grants paid leave for medical appointments at public and private facilities, for a maximum of 4 hours per day and up to a maximum of 50 hours per year. Furthermore, in order to extend the protection measures for its employees, Group employees are eligible for supplementary health insurance, as well as insurance policies covering occupational and non-occupational accidents, temporary coverage in the event of death or total permanent disability, and "Long Term Care" coverage, with the provision of a life annuity.

## Parental leave

Lottomatica supports its employees during some of the most important moments of their private lives, seeking, as far as possible, to offer **flexible working arrangements** to facilitate maternity and, more generally, the protection of parenthood.

With regard to paid parental leave, **the Group voluntarily grants same-sex couples the same conditions as opposite-sex couples** following the birth, adoption, or fostering of a child. This corporate decision aims to ensure complete equality of treatment, creating a situation that is more advantageous than that provided for by current legislation.

## WELFARE AND WELL-BEING

Lottomatica Group cares about the **well-being of its people**, both inside and outside the workplace, with particular attention to the family needs and mental and

physical health of its staff, through **people care, welfare, and work-life** balance projects and initiatives.

In this regard, the Group adopts various flexible solutions, including: flexible start and finish times; part-time working hours, especially for women; time banks for employees who do not accrue ROL (reduced working hours); smart working; parental leave; "pink" parking spaces for expectant mothers and reserved parking spaces for protected categories and shift workers, with particular protection, through extensive night-time smart working, for those who, due to the nature of their work or duties, find it more difficult to balance their working hours with their private lives.

The **initiatives** implemented in the areas of **welfare** and **well-being** are open to all Group employees and include:

|  Welfare                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  Wellbeing                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• Hour bank for employees who do not accrue ROL (reduced working hours)</li><li>• Meal vouchers</li><li>• Health insurance policies</li><li>• Supplementary health insurance</li><li>• Optional maternity leave for 3 months (after the mandatory 100%)</li><li>• Scholarships for best report cards and back to school</li><li>• Reimbursements for nursery and preschool</li><li>• Partnerships and agreements</li><li>• Agreements with summer camps for children</li><li>• Paid leave for medical appointments</li><li>• Christmas gift cards</li><li>• Vouchers with discount codes</li></ul> | <ul style="list-style-type: none"><li>• Flexible start and finish times</li><li>• Part-time working hours available</li><li>• Smart working</li><li>• Parental leave</li><li>• Pink parking spaces for expectant mothers</li><li>• Reserved parking spaces for protected categories and shift workers</li><li>• Sports initiatives (e.g., sports groups and team walking initiatives at headquarters)</li><li>• Healthy eating initiatives (webinars with nutritionists and cooking challenges)</li><li>• Creativity Lab</li></ul> |



Become Healthy

**Become Healthy** is Lottomatica’s program designed to inspire healthy and sustainable lifestyles, starting with small daily actions and choices. From physical activity and nutrition to mindfulness and meditation, Become Healthy is a journey focused on individual and collective well-being.

The Become Healthy program for 2025 is based on three pillars, which partly continue the path started in 2024 with webinars on proper nutrition, and partly introduce new elements:

- **Healthy eating:** in collaboration with Miomeal, and with the valuable contribution of a nutrition-ist and a renowned digital content creator, the Group has launched “Chef in Action”, an initiative that transforms cooking into an interactive experience. Through guided video recipes and an incentive mechanism, participants can test themselves, share their dishes with the internal com-munity and, above all, learn more about the importance of a balanced diet;
- **Physical well-being:** exercise is an essential component of well-being and, in addition to the Gaming Cup –the eight-a-side football, padel and pickleball tournament for gaming industry op-erators –Lottomatica has introduced monthly training classes. With the support of expert train-ers, employees have the opportunity to participate in varied and dynamic training sessions at a sports center near the headquarters in Rome;
- **Creativity Lab:** creativity and well-being are closely linked. Throughout the year, sessions are organized dedicated to activities that stimulate creativity and allow participants to relax through manual work. These workshops are carried out in collaboration with “Associazione KIM”, an orga-nization that provides support and assistance to sick children and their families.



CERTIFICATIONS AND AWARDS

The Group’s commitment to diversity, inclusion, and equal opportunities is confirmed by the achievement of the following awards and certifications:

- **Best HR Team**, promoted by the HRC Community Network –MyHRGoal, cer-tifies the quality and effectiveness of the actions and projects carried out by the Group’s HR team, with a view to creating an increasingly sustainable and “future-ready” company.
- **Top Employer**, awarded to organisations committed to achieving the high-est standards in HR practices.
- **Gender Equality UNI/PdR 125:2022**, which certifies adherence to quality standards and practices that promote gender equality in the workplace;
- **ISO 26000**, which certifies the company’s social responsibility, confirming responsible management of activities on issues such as governance, human rights, and working conditions.
- **ISO 45001**, which certifies a commitment to ensuring a safe and healthy working environment and preventing accidents and health problems.



# COMMUNITY AND ENVIRONMENT WE SHARE WITH COMMUNITIES

*Lottomatica contributes to generating positive and tangible impacts on the community through the implementation of social initiatives and policies to reduce direct and indirect environmental impacts. The Group is also committed to the sustainable development of the entire supply chain, promoting the creation of value for all operators in the chain.*



Lottomatica's  
commitment to the  
community

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Lottomatica's  
commitment to  
the environment

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Network,  
partners and  
suppliers

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# COMUNITÀ E AMBIENTE WE SHARE WITH COMMUNITIES

## LOTTOMATICA'S COMMITMENT TO THE COMMUNITY

Lottomatica Group has always been active in implementing **initiatives of collective interest** and **pursuing sustainable growth objectives**, with projects ranging from initiatives for the training and development of young people, to the promotion of sport as a tool for inclusion and personal development, to scientific research and solidarity initiatives.

FONDAZIONE  
LOTTOMATICA

This commitment to supporting the community is also carried out through **Lottomatica Foundation**, established with the aim of enhancing the creation of collective value with **projects that have a high social impact**.

In this context, the main associations and initiatives supported include:

- **CePID** (Integrated Psychiatric Centre for Research, Prevention and Treatment of Addictions), inaugurated in 2023 in collaboration with the Agostino Gemelli IRCCS University Hospital Foundation, which in two years has welcomed around 400 patients, treating mainly disorders related to substance use (45%) and alcohol (41%). In collaboration with CePID, since 2023 the Group has been running a comprehensive training and awareness programme on responsible gaming for its betting network, its directly managed network and its indirectly managed VLT sales network.
- **Mobile Angel**, a service created through collaboration between the Carabinieri Corps and Soroptimist International for the creation of smartwatches connected directly to the operations centre of the Provincial Command of the Carabinieri in Rome, which, when worn by victims of persecution or gender-based violence, can send a request for help.
- **Ripartenze: riprendiamoci il futuro** ("Restarts: let's reclaim the future"), a project carried out in collaboration with the non-profit organisation ELIS, which involves prisoners and people subject to other judicial measures in professional integration programmes.
- **"Digitalmente Attivi"** ("Digitally Active"), a project created in collaboration with Longevitas Foundation, with the aim of promoting digital literacy among the over-65s.
- **"Passaporto del Guarito"** ("Passport of the Healed"), a project by the Bambino Gesù Paediatric Hospital in collaboration with the Peter Pan ODV association and the Bambino Gesù Foundation.
- **Race for the Cure and Run4Rome**, traditional charity sporting events held every year in the city of Rome.
- **Secondigliano Prison (Naples)**, with the inauguration of a new basketball court in collaboration with FIP (Italian Basketball Federation) and the non-profit association Seconda Chance.
- **"Percorsi di Secondo Welfare"**, for the scientific dissemination of topics of collective and national interest.
- **Il Dono Foundation**, with initiatives aimed at supporting and including people with disabilities or in socially vulnerable situations.
- **Avintavè**, a voluntary organisation dedicated to the development of international cooperation projects in support of children in the world's poorest countries.
- **IEO-Monzino Foundation**, in support of clinical and experimental research carried out by the European Institute of Oncology and the Monzino Cardiology Centre.
- **McKim Medal Gala**, an annual event that rewards those whose work at an international level, particularly in Italy and the United States, has made a significant contribution to the arts and humanities.
- **ASD Warriors Viadana**, an amateur sports association set up with the aim of promoting sport for people with motor disabilities, in particular Powerchair Hockey and Powerchair Football.
- **Salvamamme**, an association supporting vulnerable women and families, which aims to respond to requests for help from women who are victims of violence or stalking through its 'Valigia di salvataggio' (Rescue Suitcase) initiative.
- **Rosso**, a start-up with the ambitious goal of eliminating the blood shortage in Italy by 2030, which periodically involves the Group's colleagues in blood donation campaigns.
- **Food4People**, a programme of initiatives for the periodic collection of food for charitable organisations, which in 2024 involved 12 company offices in six different Italian regions, for a total of approximately 1,350 kg of food collected and distributed to charitable organisations operating in the area.
- **Ambiente Mare Italia**, an association committed to protecting biodiversity, raising environmental awareness and promoting the local area.
- **FAI – Fondo per l'Ambiente Italiano** ("Italian Environment Fund"), of which the Group is a Corporate Golden Donor.
- **Associazione KIM**, with the project "La speranza in una stanza" ("Hope in a room"), for the reception and care of seriously ill children from all over the world.
- **"Bea a Colori"**, created to support and promote social, social welfare, social health and health activities through projects supporting children and families and scientific research.

20 active projects  
for the community



## DIALOGUE WITH TRADE ASSOCIATIONS

As established in its Code of Ethics, Lottomatica **does not directly or indirectly favour or discriminate against any political or trade union organisation**, and **refrains** from **making any direct or indirect contribution**, in any form, **to parties, movements, committees and political and trade union organisations, their representatives and candidates**, and bases any relationship with trade unions, political parties and their representatives or candidates on the highest principles of transparency and fairness and in strict compliance with applicable laws. However, this does not apply to **solidarity initiatives**, which the Company considers to be an essential value, playing an active and sensitive role with entities operating in the social field.

Lottomatica Group is a member of **Confcommercio** – Imprese per l'Italia (“Confcommercio–Businesses for Italy”) and **Unindustria**, the regional association of the Confindustria system in Rome, Frosinone, Latina, Rieti and Viterbo. The Group is also a member of **AGIC** (“Associazione Gioco e Intrattenimento in Concessione”), an association affiliated with Confindustria that represents the leading concessionaires in the public and regulated gaming sector in Italy. The **causes** supported by the association aim to promote actions and investments in legality, safety and responsibility towards consumers and communities, values that have always been at the heart of the activities of

member companies and principles that are essential for building a solid and modern Italian gaming industry.

Since 2024, Lottomatica Group has been a member of the **European Association for the Study of Gambling (EASG)**, founded to increase dialogue between its members and other stakeholders, representing all aspects of gaming. The Association organises conferences to explore and disseminate knowledge on all issues related to the study of gaming in Europe.

Finally, the subsidiary GBO Italy S.p.A. is a member of the **World Lottery Association**, an international organisation that for more than 20 years has represented the best companies operating in the gaming sector in over 80 countries around the world, and of the **ULIS** (United Lotteries for Integrity in Sport) association, which focuses on promoting and protecting integrity in the world of sport.

Lottomatica is also a member of **Assonime**, an association of Italian joint-stock companies that studies and deals with issues concerning the interests and development of the Italian economy.

## LOTTOMATICA'S COMMITMENT TO THE ENVIRONMENT

Lottomatica recognises the importance of creating shared value while respecting the environment. The Group has outlined guidelines to support this commitment by adopting an **Environmental Sustainability Policy** and defining an **Environmental Sustainability Strategy**.



Its commitment to protecting the environment is further strengthened by the adoption of an **ISO 14001**-certified **Environmental Management System** and a **Green Procurement Policy**, as well as through its ongoing commitment to the **efficient use of energy and natural resources** and to the management and **monitoring of environmental performances**. The Group has also recently validated its GHG inventory through **ISO 14064 certification**.



ENVIRONMENTAL  
SUSTAINABILITY POLICY

The [Environmental Sustainability Policy](#) establishes Lottomatica Group’s environmental standards, laying the foundations for **achieving net-zero** through the pursuit of a series of measurable objectives. These include: **minimising indirect emissions** from offices and points of sale and **significantly reducing direct emissions**, increasing energy procurement **from renewable sources**, minimising the use of resources and waste production, reducing environmental impacts through the **analysis of environmental**, physical and transition **risks and opportunities**, as well as through specific **monitoring and control** systems.

**The Policy applies to all Group companies**, including employees, consultants, suppliers and business partners. **Responsibility** for its approval lies with Lottomatica Group Board of Directors, while its application is entrusted to a robust **governance** structure involving all levels and organisational structures. This involves the preparation of an **annual activity plan** by the Environmental Sustainability Committee, coordinated by the Environment department, which is then validated by the ESG Management Committee and finally approved by the ESG Board Committee.

 Read the **Environmental Sustainability Policy** on [Lottomaticagroup.com](#)

LESS STRATEGY  
AND DECARBONISATION PLAN

In order to achieve the objectives outlined in the Policy, in 2023 Lottomatica defined an **environmental sustainability strategy** called **LESS** (Lottomatica **E**nvironmental **S**ustainability **S**trategy), structured around **three areas of action** on which programmes and commitments aimed at significantly reducing the Group’s carbon footprint are focused: Climate Change, Resources and Circular Economy; Governance.



One of the main tools for implementing the LESS strategy is the [Decarbonisation Plan](#), through which Lottomatica has set itself the goal of reducing direct greenhouse gas emissions by **64% in 10 years (Scope 1)**, to cut indirect emissions attributable to the purchase of energy for offices and points of sale (**Scope 2 market-based**) by **at least 95% by 2025**, and to reduce by **36% by 2033** the most impactful indirect emissions produced along the value chain (known as **Scope 3**), calculated on the basis of the GHG Protocol.

 Read the **Decarbonisation Plan** on [Lottomaticagroup.com](#)

| Emissions         | Base year | Base value   | Target year <sup>1</sup> | Target value | % of reduction |
|-------------------|-----------|--------------|--------------------------|--------------|----------------|
| Emissioni Scope 1 | 2023      | 5,019 tCO2e  | 2033                     | 1,807 tCO2e  | -64%           |
| Emissioni Scope 2 | 2023      | 2,142 tCO2e  | 2025                     | 107 tCO2e    | -95%           |
| Emissioni Scope 3 | 2023      | 49,806 tCO2e | 2033                     | 31,876 tCO2e | -36%           |

For each lever, the potential for CO2 reduction between 2033 and 2023 was compared in relation to its specific Scope:

- With regard to **Scope 1**, the Group intends to reduce its emissions by sourcing 100% certified green fuel and renewing its fleet with vehicles with reduced environmental impact;
- With reference to **Scope 2**, the lever considers the elimination of emissions caused by the use of electricity in offices and points of sale through the procurement of 100% certified green energy;
- With regard to **Scope 3**, potential levers have been identified for each of the categories affected by the Group’s activities. Specifically: with regard to category 1 (production of purchased services), consideration was given to reducing emissions by continuously selecting **suppliers** who are **mindful of the environmental sustainability** of their activities, encouraging technological investments and responsible behaviour throughout the value chain. In fact, in its role as a virtuous industry leader, Lottomatica already has a comprehensive **green procurement** programme in place, which is also reflected in its Environmental Policy and Supplier Code of Conduct. In fact, in its role as a virtuous leader, already has a structured green procurement activity in place, which is also reflected in its Environmental Policy and Supplier Code of Conduct, which explicitly commits all suppliers to continuously improve their environmental management systems and performance, reducing emissions and waste production, as well as increasing the use of energy from renewable sources. With regard to categories 4 and 9 (Upstream and downstream transport and distribution), the reduction in emissions due to the gradual adoption of a greater number of electric vehicles by suppliers was also taken into account.

<sup>1</sup> For Scope 2 GHG emissions, the target year has not been set at 2033, as Lottomatica Group already plans to reduce its emissions by 95% by 2025.



ELECTRICITY CONSUMPTION AND GHG EMISSIONS

Electricity consumption in offices and retail outlets represents the largest source of direct and indirect consumption. The aggregate figures as at 31 December 2024 are shown in the tables below.

Renewable energy accounted for 49% of total energy consumption.

| Fuel consumption                           | u.m. | 2024      |
|--------------------------------------------|------|-----------|
| From non-renewable sources                 |      |           |
| Natural gas for heating                    |      | 15,303.74 |
| Natural gas for motor vehicles             |      | 0.16      |
| Diesel fuel for motor vehicles             | MWh  | 8,284.91  |
| Petrol for motor vehicles                  |      | 2,342.06  |
| LPG for motor vehicles                     |      | 41.42     |
| From renewable sources                     |      |           |
| HVO biodiesel for motor vehicles           | MWh  | 26.19     |
| Total fuel consumption from fossil sources | MWh  | 25,998.50 |

| Energy purchased                                       | u.m. | 2024      |
|--------------------------------------------------------|------|-----------|
| Electrical energy purchased from non-renewable sources |      | 1,544.14  |
| Electrical energy purchased from renewable sources     | MWh  | 26,392.00 |
| Energy purchased for district heating                  |      | 64.96     |
| Total energy purchased                                 | MWh  | 28,001.10 |

| Total energy consumption                        | u.m. | 2024      |
|-------------------------------------------------|------|-----------|
| Total energy consumption from fossil sources    | MWh  | 27,516.45 |
| Total energy consumption from renewable sources |      | 26,483.14 |
| Total electricity energy purchased              | %    | 49.04     |

The following table shows emissions relating to Scopes 1, 2 and 3 and total emissions as at 31 December 2024.

| Total emissions                                       | u.m.               | 2024      |
|-------------------------------------------------------|--------------------|-----------|
| Scope 1 Emissions                                     |                    |           |
| Gross Scope 1 emissions                               | tCO <sub>2</sub> e | 5,956.46  |
| Scope 2 Emissions                                     |                    |           |
| Gross Scope 2 emissions (location-based)              | tCO <sub>2</sub> e | 6,666.06  |
| Gross Scope 2 emissions (market-based)                |                    | 720.63    |
| Scope 3 Emissions                                     |                    |           |
| Total gross Scope 3 location-based indirect emissions | tCO <sub>2</sub> e | 73,868.86 |
| Total gross Scope 3 market-based indirect emissions   |                    | 73,259.59 |
| Total emissions                                       |                    |           |
| Total emissions (location-based)                      | tCO <sub>2</sub> e | 86,491.45 |
| Total emissions (market-based)                        |                    | 79,936.68 |

CLIMATE AND ENVIRONMENTAL RISKS

Lottomatica has integrated **climate change related risks** into its Enterprise Risk Management system, although it considers them to have a low impact on the Group's activities as a service company, aware of their growing importance and potential strategic and operational impacts.



In this context, Lottomatica, through its committees and management, is committed to continuously updating its climate and environmental risk identification and assessment system, aiming to increasingly integrate these types of risk into the Group's strategy and operations, through analyses based on complex medium- to long-term scenarios. In particular, **responsibility for climate-related risks is assigned at a managerial level**: the assessment of physical and transition risks is carried out by the Environmental function, coordinated by the Responsible Gaming, Environmental & Regulatory Evolution Senior Manager, while the Risk, Ethics & Compliance function, led by the Chief Risk, Ethics & Compliance Officer, oversees the monitoring of risks included within the ERM Model, which also comprises environmental risks (including both physical and transition climate risks).

In 2024, a process of further investigation was launched, focusing on the **assessment of the physical risks** to which the Group's companies and activities are exposed. For each strategic asset (headquarters, directly managed points of sale, strategic suppliers, etc.), the risks were assessed taking into account the main international studies, including those periodically carried out by the Intergovernmental Panel on Climate Change (IPCC).



The analysis resulted in a risk score (heat map) for each of the climate-related hazards and for the resulting days of business interruption, thus enabling the **actual financial impacts to be quantified**.



The **results** of the analysis process showed the following:

PHYSICAL RISKS

|                                                                          |                                                                                                                                 |
|--------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| <b>ZERO HIGH RISK AREAS</b>                                              | None of the almost 6,000 assets analysed (offices, directly managed PoS, suppliers, etc.) have a high exposure to climate risks |
| <b>&lt;1 BUSINESS INTERRUPTION DAYS FOR LOTTOMATICA'S POINTS OF SALE</b> | The estimated business interruption days for directly managed points of sale are not significant in terms of EBITDA (<1 day).   |
| <b>&lt;1 BUSINESS INTERRUPTION DAYS FOR SUPPLIERS' PREMISES</b>          | The estimated business interruption days for suppliers' premises are not significant in terms of EBITDA (<1 day)                |

TRANSITION RISKS

|                                                       |                                                                                                           |
|-------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|
| <b>&lt;1% IMPACT ON EBITDA FOR UTILITIES INCREASE</b> | The impact on EBITDA caused by an increase in the cost of utilities of up to 10% is not significant (<1%) |
|-------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|

ENVIRONMENTAL INITIATIVES

The Group's commitment to the environment is reflected in a series of initiatives and actions, which in 2024 enabled it to **avoid 1,441 tCO<sub>2</sub>e of emissions**.

-1,441 tCO<sub>2</sub>e  
in 2024

Climate change mitigation

Lottomatica plays an active role in **reducing** greenhouse gas **emissions** and **limiting the environmental impact** of its activities, aware that the transition to a low-emission economy is not only necessary but also an opportunity to innovate responsibly. The main initiatives in this area are listed below.

GREEN MOBILITY

- **Company shuttle bus** , to encourage collective home-to-work mobility for employees, with timetables and routes optimised in 2024 to ensure better connections with the rail network.
- **LTMCar** (Let's Take My Car), an in-house developed car-pooling application to promote the sharing of private transport between colleagues and discourage the use of cars, downloaded by almost 150 employees in 2024.
- **Company car fleet**, periodically renewed to replace cars with electric/hybrid models with lower environmental impact, which saw the addition of two further fully electric vehicles to the pool car (which has already travelled 1,900 km).
- **E-GAP**, a partner supplier of the Group that allows employees at the head office to recharge electric vehicles on the move and in an easy manner.

GREEN ELECTRICITY SOURCING

- **Green energy**, from certified renewable sources, which in 2024 accounted for 88.7% of all emissions generated by the Group's electricity consumption, including 100% of directly managed halls.
- **Energy efficiency in buildings**, through the installation of energy-saving LED lamps used, for example, to light the corridors of the main office in Rome.

100%  
renewable energy for directly  
managed halls

Circular economy and sustainable resource management

For Lottomatica, **reducing waste and managing resources sustainably** means reducing waste production, disposing of waste in an appropriate and sustainable manner, and promoting the use of recyclable and reusable resources. This commitment is maintained through a **structured waste management and monitoring system**, both within its own activities and those contracted out to external organisations, and through employee awareness-raising initiatives aimed at reducing waste.

The main initiatives in this area include:

- **Repair Lab**, an internal laboratory for the repair, reuse, or disposal, in accordance with ISO 14001 procedures, of company hardware equipment, which in 2024 processed almost 14,000 different electronic assets, with a recovery rate of 84.5%.

84.5%  
revalued electronic  
devices in 2024

- **Redemption of electronic devices** , to increase the life cycle of company assets by allowing employees to redeem their computers or smartphones for non-work uses, with over 40 devices redeemed in 2024.
- **Donation of discarded or unredeemed electronic equipment** to third sector organisations, with 6 devices donated in 2024 and a donation and/or redemption campaign planned for 2025.
- **GoSign**, the Infocert Group's digital signature platform, through which more than 185,000 pages passed in 2024, an increase of almost 600%.
- **Recycled and FSC-certified paper**, used for office and stationery purposes at the head office in Rome and for printing gaming receipts at points of sale.
- **Clean-up day**, a voluntary initiative promoted in collaboration with the Ambiente Mare Italia association, which in 2024 involved colleagues in cleaning up a beach on the Roman coast of Ostia, continuing in 2025 with an intervention on the coast of Fiumicino.
- **Raccolta differenziata** almost exclusively urban, in order to ensure its correct disposal in accordance with local regulations: in this regard, in 2024 a process was launched to monitor the weighing of urban waste produced at the Aldobrandeschi headquarters.
- **Become Green**, an internal awareness programme launched in 2020 with the aim of encouraging virtuous behaviour and waste reduction.



ENVIRONMENTAL CERTIFICATIONS

The main companies of Lottomatica Group adopt an Environmental Management System certified in accordance with **ISO 14001, covering over 80% of the operations**. The Environmental Management System, which is aligned with the most widely used international standards and based on the **principle of risk management and prevention**, allows the Group to systematically integrate tools for **monitoring environmental performance**, minimising the risk of penalties for non-compliance with regulations and reducing environmental liabilities.

| Certification                                       | Certified companies                                                                                                                              | % of coverage            |
|-----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| Environmental Management System<br>UNI EN ISO 14001 | Lottomatica Group; Betflag;<br>Big Easy; Big Easy Bingo;<br>Gamenet; GBO Italy; Jolly Group;<br>Lottomatica Videolot Rete;<br>Marim; PWO; Totosi | 80%<br>of the activities |

The Group has also recently validated its GHG inventory through **ISO 14064 certification**, which provides guidelines for quantifying, monitoring and reporting an organisation’s greenhouse gas (GHG) emissions, promoting the credibility and transparency of climate data.

| Certification                                 | Certified companies                                                    | % of coverage          |
|-----------------------------------------------|------------------------------------------------------------------------|------------------------|
| GHG Emissions Measurement<br>UNI EN ISO 14064 | Lottomatica Group<br>(applicable to all companies<br>within the scope) | 100% of the activities |

WATER

Given its predominant nature as a service provider, Lottomatica only records water consumption for civil use in its offices and gaming halls, with no significant impact on water sources. Despite this, the Group aims to manage water efficiently, taking concrete action to reduce water consumption and promote its correct use in order to prevent and avoid waste.

CDP RATING

The **Carbon Disclosure Project** –CDP–is the leading independent international organisation for assessing the environmental strategies and performance of companies, capital markets, cities, states, and regions. The CDP **rating** assesses the level of detail and completeness of the information provided by an entity, as well as its awareness of environmental issues, management methods and progress made in environmental matters. The assessment methodology is aligned with the International Financial Reporting Standards (IFRS) S2 Climate-related Disclosures and the recommendations of the Taskforce for Climate-Related Financial Disclosures (TCFD), in order to provide a set of data that is comparable across the global market.

Lottomatica Group has joined **CDP** since 2024 and is currently rated **B** (in the “**Management**” category), which recognises the effectiveness of the actions taken by the company to address the challenges of climate change and reduce its environmental impact, mitigate risks, improve environmental reporting and assemble robust and comprehensive risk assessments.



## NETWORK, PARTNERS AND SUPPLIERS

Lottomatica selects, evaluates and manages commercial relationships with partners and suppliers according to **criteria of fairness, equity, and transparency**, ensuring **compliance with ESG criteria** throughout the value chain. As a **supply chain leader**, the Group is strongly committed to promoting sustainable practices within its network and has adopted a **Supplier Code of Conduct** and a **Green Procurement Policy** to guide its choice of and relationship with business partners.

### GREEN PROCUREMENT

The **Green Procurement Policy**, which is part of the Environmental Sustainability Policy, aims to regulate the supplier selection process by favouring those who, for the same goods and/or services, have a lower environmental impact.

 Read the **Green Procurement Policy** (included in the Environmental Sustainability Policy) on [Lottomaticagroup.com](https://lottomaticagroup.com)



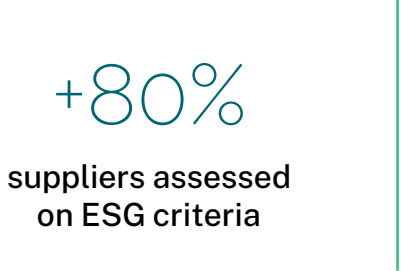
*When selecting its suppliers, the Group favours those who produce goods and/or provide services that have a lower or reduced impact on the environment compared to other products and services used for the same purpose.*

*Lottomatica's general commitment to green procurement*

The Group is committed to promoting sustainability in its supply chain and **engaging its suppliers in improving their environmental performance**. Suppliers listed in the Register are subject to ESG assessments via the “SynESGy” platform, as well as regular audits to monitor their compliance with the required quality and sustainability standards.

In particular, the assessment takes into account **social risks**, such as child labour or unsafe working conditions, and **environmental criteria**: the selection process includes **reward mechanisms** for the adoption of low environmental impact technologies and production processes, the use of renewable energy, the presence of decarbonisation plans and the possession of recognised certifications such as ISO 14001, EMAS, or equivalent.

Suppliers participating in tenders are therefore evaluated not only from a technical/economic point of view but also in terms of sustainability, and this evaluation constitutes a reward element. A representative sample of suppliers is also subject to on-site audits to verify compliance with the Supplier Code of Conduct and the Group's Environmental Sustainability Policy.



In 2024, as in previous years, the proportion of suppliers accredited through the SynESGy platform was **over 80%**.

### SUPPLIER CODE OF CONDUCT

**The Supplier Code of Conduct** describes Lottomatica's minimum and essential expectations for establishing or extending a working relationship with suppliers, their parent companies, subsidiaries, affiliates, subcontractors and other entities that are part of their supply chain.

The expectations set out in the Code supplement the specific contractual conditions and go beyond the control mechanisms such as the Code of Ethics, the Organisation, Management and Control Model pursuant to Legislative Decree 231/01 and the Anti-bribery and Corruption Policy. Each Supplier guarantees, under its full and exclusive responsibility, that all its employees, representatives and subcontractors fully understand and comply with these guidelines.

In addition, the Group's suppliers, in addition to complying with all applicable laws and international environmental, social and governance standards, must adhere to the principles described in the Code of Conduct, failing which the existing relationship will be promptly terminated.

 Read the **Supplier Code of Conduct** on [Lottomaticagroup.com](https://lottomaticagroup.com)

# ESG RESOURCES AND POLICIES

|                                                          |                                                               |                                  |                                                                 |                                                                                                                                                                                       |                                   |
|----------------------------------------------------------|---------------------------------------------------------------|----------------------------------|-----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|
| CONSOLIDATED<br>SUSTAINABILITY<br>STATEMENT              | REPORT ON CORPORATE<br>GOVERNANCE AND<br>OWNERSHIP STRUCTURES | REPORT ON<br>REMUNERATION POLICY | LESS LOTTOMATICA<br>ENVIRONMENTAL<br>SUSTAINABILITY<br>STRATEGY | ENVIRONMENTAL<br>SUSTAINABILITY POLICY                                                                                                                                                | GREEN<br>PROCUREMENT POLICY       |
| PROTECTION AND<br>SAFEGUARDING OF HUMAN<br>RIGHTS POLICY | DIVERSITY POLICY<br>OF THE BOARD<br>OF DIRECTORS              | SMART WORKING<br>POLICY          | CODE OF ETHICS                                                  | DATA PROTECTION POLICY                                                                                                                                                                | DIVERSITY<br>AND INCLUSION POLICY |
| INFORMATION<br>SECURITY POLICY                           | GENDER EQUALITY POLICY                                        | SUPPLIER CODE<br>OF CONDUCT      | RESPONSIBLE<br>MARKETING POLICY                                 | QUALITY AND SAFETY<br>POLICY                                                                                                                                                          | 231 MODEL                         |
| REPORTS MANAGEMENT<br>PROCEDURE<br>(WHISTLEBLOWING)      | ANTI-BRIBERY &<br>CORRUPTION POLICY                           | ANTI-MONEY LAUNDERING<br>POLICY  | RESPONSIBLE GAMING<br>POLICY                                    | <div></div> <div>The documents are available<br/>on Lottomatica Group's corporate website.</div> |                                   |

# SUSTAINALYTICS CONTENT INDEX

## Business Ethics

|                                                 | Internal Reference                                                                                                                                       | External Reference                                                                                                                                                                                              |
|-------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Bribery & Corruption Policy                     | <ul style="list-style-type: none"><li>Anti-Bribery &amp; Corruption</li></ul>                                                                            | <ul style="list-style-type: none"><li>Anti-Bribery &amp; Corruption Policy</li><li>Code of Ethics</li></ul>                                                                                                     |
| Bribery & Corruption Programmes                 | <ul style="list-style-type: none"><li>Anti-Bribery &amp; Corruption</li><li>Responsibility, monitoring, and training on business ethics issues</li></ul> | <ul style="list-style-type: none"><li>Anti-Bribery &amp; Corruption Policy</li><li>Consolidated Sustainability Statement 2024</li></ul>                                                                         |
| Business Ethics Programme                       | <ul style="list-style-type: none"><li>Responsibility, monitoring, and training on business ethics issues</li></ul>                                       | <ul style="list-style-type: none"><li>Code of Ethics</li><li>Consolidated Sustainability Statement 2024</li></ul>                                                                                               |
| Money Laundering Policy                         | <ul style="list-style-type: none"><li>Anti-money laundering</li></ul>                                                                                    | <ul style="list-style-type: none"><li>Anti-money laundering and countering terrorist financing group Policy</li></ul>                                                                                           |
| Political Involvement Policy                    | <ul style="list-style-type: none"><li>Code of Ethics</li></ul>                                                                                           | <ul style="list-style-type: none"><li>Code of Ethics</li></ul>                                                                                                                                                  |
| Transparency on Lobbying and Political Expenses | <ul style="list-style-type: none"><li>Dialogue with trade associations</li></ul>                                                                         | -                                                                                                                                                                                                               |
| Whistleblower Programmes                        | <ul style="list-style-type: none"><li>Whistleblowing</li><li>Responsibility, monitoring, and training on business ethics issues</li></ul>                | <ul style="list-style-type: none"><li>EthicsPoint, <a href="http://www.ethicspoint.eu">www.ethicspoint.eu</a></li><li>Reports management procedure</li><li>Consolidated Sustainability Statement 2024</li></ul> |

## Carbon - Own Operations

|                                 | Internal Reference                                                                                                                                                               | External Reference                                                                                                                                          |
|---------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Carbon Intensity                | <ul style="list-style-type: none"><li>Electricity consumption and GHG emissions</li></ul>                                                                                        | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li></ul>                                                                  |
| Carbon Intensity Trend          | <ul style="list-style-type: none"><li>Electricity consumption and GHG emissions</li></ul>                                                                                        | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li></ul>                                                                  |
| EMS Certification               | <ul style="list-style-type: none"><li>Integrated Management System for Quality, Safety, and the Environment</li><li>Lottomatica's commitment to the environment</li></ul>        | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li></ul>                                                                  |
| Environmental Management System | <ul style="list-style-type: none"><li>Lottomatica's commitment to the environment</li></ul>                                                                                      | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li></ul>                                                                  |
| Environmental Policy            | <ul style="list-style-type: none"><li>Environmental Sustainability Policy</li></ul>                                                                                              | <ul style="list-style-type: none"><li>Environmental Sustainability Policy</li></ul>                                                                         |
| GHG Reduction Programme         | <ul style="list-style-type: none"><li>LESS Strategy and decarbonisation plan</li><li>Electricity consumption and GHG emissions</li><li>Climate and environmental risks</li></ul> | <ul style="list-style-type: none"><li>Lottomatica Environmental Sustainability Strategy (LESS)</li><li>Consolidated Sustainability Statement 2024</li></ul> |
| GHG Risk Management             | <ul style="list-style-type: none"><li>Lottomatica's commitment to the environment</li><li>Climate and environmental risks</li></ul>                                              | <ul style="list-style-type: none"><li>Lottomatica Environmental Sustainability Strategy (LESS)</li><li>Consolidated Sustainability Statement 2024</li></ul> |
| Renewable Energy Programmes     | <ul style="list-style-type: none"><li>LESS Strategy and decarbonisation plan</li><li>Environmental initiatives</li></ul>                                                         | <ul style="list-style-type: none"><li>Lottomatica Environmental Sustainability Strategy (LESS)</li><li>Consolidated Sustainability Statement 2024</li></ul> |
| Renewable Energy Use            | <ul style="list-style-type: none"><li>Electricity consumption and GHG emissions</li></ul>                                                                                        | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li></ul>                                                                  |
| Scope of GHG Reporting          | <ul style="list-style-type: none"><li>Electricity consumption and GHG emissions</li><li>Climate and environmental risks</li></ul>                                                | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li></ul>                                                                  |



Corporate Governance

|                                    | Internal Reference                                                                                                            | External Reference                                                                                                                                                               |                                     | Internal Reference                                                                                                                    | External Reference                                                                                                    |
|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
| Audit Committee Experience         | <ul style="list-style-type: none"><li>Control and Risk Internal Committee</li><li>Members of the Board of Directors</li></ul> | <ul style="list-style-type: none"><li>Corporate Governance report 2024</li></ul>                                                                                                 | Executive Compensation Clawback     | -                                                                                                                                     | <ul style="list-style-type: none"><li>Report on Remuneration Policy and Compensation Paid</li></ul>                   |
| Audit Committee Independence       | <ul style="list-style-type: none"><li>Control and Risk Internal Committee</li><li>Members of the Board of Directors</li></ul> | <ul style="list-style-type: none"><li>Corporate Governance report 2024</li></ul>                                                                                                 | Long-Term Incentive Programme       | <ul style="list-style-type: none"><li>Remuneration policies</li></ul>                                                                 | <ul style="list-style-type: none"><li>Report on Remuneration Policy and Compensation Paid</li></ul>                   |
| Board Committee Structure          | <ul style="list-style-type: none"><li>Corporate Governance</li></ul>                                                          | <ul style="list-style-type: none"><li>Corporate Governance report 2024</li></ul>                                                                                                 | Nominating Committee Independence   | <ul style="list-style-type: none"><li>Members of the Board of Directors</li></ul>                                                     | <ul style="list-style-type: none"><li>Corporate Governance report 2024</li></ul>                                      |
| Board Effectiveness                | <ul style="list-style-type: none"><li>Board of Directors</li><li>Members of the Board of Directors</li></ul>                  | <ul style="list-style-type: none"><li>Corporate Governance report 2024</li><li>Corporate bodies   Lottomatica Group</li></ul>                                                    | Remuneration Committee Independence | <ul style="list-style-type: none"><li>Members of the Board of Directors</li></ul>                                                     | <ul style="list-style-type: none"><li>Corporate Governance report 2024</li></ul>                                      |
| Board Executive Experience         | <ul style="list-style-type: none"><li>Board of Directors</li><li>Members of the Board of Directors</li></ul>                  | <ul style="list-style-type: none"><li>Corporate Governance report 2024</li><li>Corporate bodies   Lottomatica Group</li></ul>                                                    | Risk Oversight                      | <ul style="list-style-type: none"><li>Group's Risks, Impacts, and Opportunities</li><li>Control and Risk Internal Committee</li></ul> | <ul style="list-style-type: none"><li>Corporate Governance report 2024</li><li>Annual financial report 2024</li></ul> |
| Board Gender Diversity             | <ul style="list-style-type: none"><li>Board of Directors</li></ul>                                                            | <ul style="list-style-type: none"><li>Corporate Governance report 2024</li><li>Corporate bodies   Lottomatica Group</li><li>Consolidated Sustainability Statement 2024</li></ul> | Say on Pay                          | -                                                                                                                                     | <ul style="list-style-type: none"><li>Vote results 2025 (FY2024)</li></ul>                                            |
| Board Gender Representation Target | <ul style="list-style-type: none"><li>Board of Directors</li></ul>                                                            | <ul style="list-style-type: none"><li>Diversity Policy of the Board of Directors</li></ul>                                                                                       | Shareholder Dissent                 | -                                                                                                                                     | <ul style="list-style-type: none"><li>Vote results 2025 (FY2024)</li></ul>                                            |
| Board Independence                 | <ul style="list-style-type: none"><li>Board of Directors</li></ul>                                                            | <ul style="list-style-type: none"><li>Corporate Governance report 2024</li><li>Corporate bodies   Lottomatica Group</li><li>Consolidated Sustainability Statement 2024</li></ul> | Short-Term Incentive Programme      | <ul style="list-style-type: none"><li>Remuneration policies</li></ul>                                                                 | <ul style="list-style-type: none"><li>Report on Remuneration Policy and Compensation Paid</li></ul>                   |
| Board Non-Executive Experience     | <ul style="list-style-type: none"><li>Members of the Board of Directors</li></ul>                                             | <ul style="list-style-type: none"><li>Corporate bodies   Lottomatica Group</li><li>Corporate Governance report 2024</li></ul>                                                    | Voting Proportionality              | -                                                                                                                                     | <ul style="list-style-type: none"><li>Corporate Governance report 2024</li></ul>                                      |

Data Privacy and Cybersecurity

|                         | Internal Reference                                                                                   | External Reference                                                                                                        |
|-------------------------|------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| Cybersecurity Programme | <ul style="list-style-type: none"><li>Data security, privacy protection, and cybersecurity</li></ul> | <ul style="list-style-type: none"><li>Annual financial report 2024</li></ul>                                              |
| Data Privacy Policy     | <ul style="list-style-type: none"><li>Data Protection Policy</li></ul>                               | <ul style="list-style-type: none"><li>Data Protection Policy</li><li>Privacy Policies   Lottomatica Group</li></ul>       |
| Data Privacy Programme  | <ul style="list-style-type: none"><li>Training in data privacy, protection, and security</li></ul>   | <ul style="list-style-type: none"><li>Data Protection Policy</li><li>Consolidated Sustainability Statement 2024</li></ul> |

E&S Impact of Products and Services

|                              | Internal Reference                                                                    | External Reference                                                                                                           |
|------------------------------|---------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|
| Responsible Gaming Programme | <ul style="list-style-type: none"><li>Responsible Gaming Policy and Program</li></ul> | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li><li>Responsible Gaming Policy</li></ul> |
| Responsible Marketing Policy | <ul style="list-style-type: none"><li>Responsible marketing policy</li></ul>          | <ul style="list-style-type: none"><li>Responsible Marketing Policy</li></ul>                                                 |

Human Capital

|                                  | Internal Reference                                                                                               | External Reference                                                                                                                            |
|----------------------------------|------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| Collective Bargaining Agreements | <ul style="list-style-type: none"><li>Collective bargaining and social dialogue</li></ul>                        | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li></ul>                                                    |
| Discrimination Policy            | <ul style="list-style-type: none"><li>Diversity, inclusion, and equal opportunities</li></ul>                    | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li><li>Code of Ethics</li><li>Human Rights Policy</li></ul> |
| Diversity Programmes             | <ul style="list-style-type: none"><li>Diversity, inclusion, and equal opportunities</li></ul>                    | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li></ul>                                                    |
| Employee Turnover Rate           | <ul style="list-style-type: none"><li>Staff composition and turnover</li></ul>                                   | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li></ul>                                                    |
| Freedom of Association Policy    | <ul style="list-style-type: none"><li>Health and safety, welfare and well-being</li></ul>                        | <ul style="list-style-type: none"><li>Human Rights Policy</li></ul>                                                                           |
| Gender Pay Disclosure            | <ul style="list-style-type: none"><li>Gender diversity</li></ul>                                                 | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li><li>Report on remuneration policy</li></ul>              |
| Gender Pay Equality Programme    | <ul style="list-style-type: none"><li>Gender diversity</li></ul>                                                 | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li><li>Gender equality policy</li></ul>                     |
| Human Capital Development        | <ul style="list-style-type: none"><li>People Growth and Development</li></ul>                                    | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li></ul>                                                    |
| Percentage of Temporary Workers  | <ul style="list-style-type: none"><li>Staff composition and turnover</li></ul>                                   | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li></ul>                                                    |
| Working Hours Policy             | <ul style="list-style-type: none"><li>Respect for human and labour rights</li><li>Working Hours Policy</li></ul> | <ul style="list-style-type: none"><li>-</li></ul>                                                                                             |



Product Governance

|                                      | Internal Reference                                                                                                    | External Reference                                                                                             |                         | Internal Reference                                                                                                                                                                                                              | External Reference                                                                                                                                        |
|--------------------------------------|-----------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| Product and Service Safety Programme | <ul style="list-style-type: none"><li>Product and service safety</li></ul>                                            | <ul style="list-style-type: none"><li>Responsible Gaming Policy</li><li>Responsible Marketing Policy</li></ul> | GHG Reduction Programme | <ul style="list-style-type: none"><li>Lottomatica’s committment to the environment</li><li>LESS Strategy and decarbonisation plan</li><li>Electricity consumption and GHG emissions</li><li>Environmental initiatives</li></ul> | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li><li>LESS-Lottomatica Environmental Sustainability Strategy</li></ul> |
| QMS Certifications                   | <ul style="list-style-type: none"><li>Integrated Management System for Quality, Safety, and the Environment</li></ul> | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li></ul>                     |                         |                                                                                                                                                                                                                                 |                                                                                                                                                           |
| Responsible Marketing Policy         | <ul style="list-style-type: none"><li>Responsible marketing policy</li></ul>                                          | <ul style="list-style-type: none"><li>Responsible Marketing Policy</li></ul>                                   |                         | Global Compact Signatory                                                                                                                                                                                                        | <ul style="list-style-type: none"><li>Adhesion to the UN Global Compact</li></ul>                                                                         |

Stakeholder Governance

|                             | Internal Reference                                                                            | External Reference                                                                                                                            |                                                 | Internal Reference                                                                                                                        | External Reference                                                                                                                                                                                                |
|-----------------------------|-----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Bribery & Corruption Policy | <ul style="list-style-type: none"><li>Anti-Bribery &amp; Corruption</li></ul>                 | <ul style="list-style-type: none"><li>Anti-bribery and Corruption Policy and Guidelines</li><li>Code of Ethics</li></ul>                      | Scope of Social Supplier Standards              | <ul style="list-style-type: none"><li>Network, partners and suppliers</li></ul>                                                           | <ul style="list-style-type: none"><li>Supplier Code of conduct</li></ul>                                                                                                                                          |
| Discrimination Policy       | <ul style="list-style-type: none"><li>Diversity, inclusion, and equal opportunities</li></ul> | <ul style="list-style-type: none"><li>Code of Ethics</li><li>Human Rights Policy</li><li>Consolidated Sustainability Statement 2024</li></ul> | Supplier Environmental Policy                   | <ul style="list-style-type: none"><li>Green Procurement</li></ul>                                                                         | <ul style="list-style-type: none"><li>Environmental Sustainability Policy</li></ul>                                                                                                                               |
| Environmental Policy        | <ul style="list-style-type: none"><li>Environmental Sustainability Policy</li></ul>           | <ul style="list-style-type: none"><li>Environmental Sustainability Policy</li></ul>                                                           | Tax Disclosure                                  | <ul style="list-style-type: none"><li>Lottomatica’s tax contributions</li></ul>                                                           | <ul style="list-style-type: none"><li>Annual financial report 2024</li></ul>                                                                                                                                      |
| ESG Governance              | <ul style="list-style-type: none"><li>Sustainability Governance</li></ul>                     | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li></ul>                                                    | Transparency on Lobbying and Political Expenses | <ul style="list-style-type: none"><li>Dialogue with trade associations</li></ul>                                                          | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li></ul>                                                                                                                        |
| ESG Reporting Standards     | -                                                                                             | <ul style="list-style-type: none"><li>Annual financial report 2024</li><li>Consolidated Sustainability Statement 2024</li></ul>               | Verification of ESG Reporting                   | -                                                                                                                                         | <ul style="list-style-type: none"><li>Annual financial report 2024</li><li>Consolidated Sustainability Statement 2024</li></ul>                                                                                   |
|                             |                                                                                               |                                                                                                                                               | Whistleblower Programmes                        | <ul style="list-style-type: none"><li>Whistleblowing</li><li>Responsibility, monitoring, and training on business ethics issues</li></ul> | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li><li>EthicsPoint, <a href="http://www.ethicspoint.eu">www.ethicspoint.eu</a></li><li>“Reports management” procedure</li></ul> |

Water Use - Own Operations

|                                  | Internal Reference                                                                                                                                                        | External Reference                                                                                                                                         |
|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|
| EMS Certification                | <ul style="list-style-type: none"><li>Integrated Management System for Quality, Safety, and the Environment</li><li>Lottomatica's commitment to the environment</li></ul> | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li></ul>                                                                 |
| Environmental Management System  | <ul style="list-style-type: none"><li>Lottomatica's commitment to the environment</li></ul>                                                                               | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li></ul>                                                                 |
| Environmental Policy             | <ul style="list-style-type: none"><li>Environmental Sustainability Policy</li></ul>                                                                                       | <ul style="list-style-type: none"><li>Environmental Sustainability Policy</li></ul>                                                                        |
| Physical Climate Risk Management | <ul style="list-style-type: none"><li>Climate and environmental risks</li></ul>                                                                                           | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li><li>LESS -Lottomatica Environmental Sustainability Strategy</li></ul> |
| Scope of Water Reporting         | <ul style="list-style-type: none"><li>Water</li></ul>                                                                                                                     | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li></ul>                                                                 |
| Water Risk Management            | <ul style="list-style-type: none"><li>Water</li></ul>                                                                                                                     | <ul style="list-style-type: none"><li>Consolidated Sustainability Statement 2024</li></ul>                                                                 |



The documents are available  
on Lottomatica Group's corporate website.

**LOTTOMatica**

[www.lottomaticagroup.com](http://www.lottomaticagroup.com)