

RESPONSIBLE GAMING POLICY

Approved by the Board of Directors

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Share capital € 10,000,000.00 fully paid-up

1 Recitals

The Lottomatica Group (the "Group") is committed to ensuring the highest level of protection for its users, particularly for the most vulnerable segments of the population, in terms of safe gaming, prevention of excessive gaming, and protection of minors. To achieve this, the Group operates in strict compliance with current regulations and personal data protection laws.

In promoting a responsible approach to gaming, the Group has adopted specific guidelines that cover all areas of influence and governance in the gaming industry. These guidelines are designed to raise awareness, provide training, and ensure accountability among all personnel involved at various stages of the supply chain.

The main areas of commitment and protection that the Group aims to ensure include:

- the Protection of minors;
- the Prevention of excessive gaming;
- the Promotion of responsible gaming.

Additionally, the Group is dedicated to maintaining an open and effective dialogue with everyone involved in promoting legal and responsible gaming. This includes employees, players, operators, regulatory authorities, institutions, medical research centres, national and international Responsible Gaming organisations, and other relevant stakeholders. The Group is also committed to adapting its Responsible Gaming policies to any regulatory changes that may arise during its public gaming operations.

The Group's programs and initiatives are crucial for reinforcing Responsible Gaming (RG) at every stage of the business. This includes training employees and the sales network, informing players, and carrying out monitoring and prevention activities, all in compliance with the requirements and regulations of the jurisdictions where the Group operates.

2 Purpose of the Policy

This document establishes the Responsible Gaming (RG) standards for all Group companies. The Policy is based on internationally recognised best practices, validated by third-party verification bodies (such as the G4 certification program developed by the Global Gambling Guidance Group and the Responsible Gaming Framework of the World Lottery Association). It outlines principles for the development of information, training, and prevention activities, in compliance with current regulations and the Group's commitment to promoting RG as a key to sustainable business development.

A core commitment, further strengthened by the measures outlined in the Responsible Marketing Policy and the dedicated Responsible Gaming procedures adopted by the Group's various companies in their operations.

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3 Field of application

This policy applies to all Group companies, as well as all employees, collaborators, and suppliers.

4 Governance

To ensure effective oversight of Responsible Gaming (RG) issues, the Group has established a robust governance structure. This involves senior management and business functions, with an annual plan of activities and initiatives developed by the Responsible Gaming Committee. The plan is then reviewed by the ESG Management Committee and ultimately approved by the Group's Internal Committee, with coordination provided by a dedicated department.

The goal is to define the set of principles, rules, and procedures related to the management and governance of Responsible Gaming (RG), which is a key aspect of the Group's sustainability strategy.

RESPONSIBLE GAMING COMMITTEE

The Responsible Gaming Committee is tasked with drafting the annual plan of initiatives and activities for the following year. It meets monthly to review project progress, assess opportunities for continuous improvement, and ensure that responsible gaming activities align with the broader business objectives.

To ensure constant alignment of activities with ESG plans, a coordination function has been established. This role is responsible for managing the Responsible Gaming Committee and overseeing Group projects, reporting them to the ESG Managerial Committee and the internal ESG Committee.

5 Objectives and Activities

The main objectives related to Responsible Gaming that the Group has defined are:

- comply with the laws and regulations of the gaming sector in the jurisdictions where the Group operates;
- minimise the impacts of the business through risk analysis and mitigation strategies;
- collaborate with relevant stakeholders to align Responsible Gaming strategies with their expectations;
- foster internal awareness, ongoing instruction, and continuous training for all employees;
- incorporate tools for preventing problem gaming into products and services, in compliance with current regulations;
- implement tools for monitoring player behaviour and minimise potential issues;

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- ensure that all promotional activities comply with the Responsible Marketing Policy;
- act consciously and consistently towards all stakeholders;
- promote responsible gaming behaviours among clients and consumers by adopting tools and technologies that support such practices;
- support clients and consumers with best practices in Responsible Gaming (RG);
- inform key stakeholders of Responsible Gaming (RG) activities through corporate communication contact points and annual reports.

To effectively pursue these objectives, the Group approves annual activities and projects dedicated to Responsible Gaming, organised into four main areas:

- 1) Training and raising awareness among human resources;
- 2) Education and raising awareness among customers;
- 3) Prevention and mitigation of impacts;
- 4) Research and development.

1) TRAINING AND RAISING AWARENESS AMONG HUMAN RESOURCES

In the realm of Responsible Gaming (RG), specific training is provided to all employees and staff who interact with players. The goal is to equip them with the skills necessary to prevent underage gaming and address problematic gaming and gaming addictions.

Training is offered through courses with varying levels of depth, tailored to the specific functions of the participants.

Staff at the Group's directly managed venues, as well as Customer Centre operators, receive specialised training to identify abnormal gaming behaviours and to provide essential cognitive tools for preventing and managing risky behaviours.

To ensure proper management of Responsible Gaming (RG), all functions involved in marketing and/or communication are required to operate according to the specific guidelines outlined in the Responsible Marketing Policy and the procedures dedicated to responsible gaming. These guidelines and procedures are adopted by each individual company within the Group as needed. Additionally, these functions are continually informed about their role and social responsibility within the RG framework.

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2) EDUCATION AND RAISING AWARENESS AMONG CUSTOMERS

In compliance with relevant communication regulations, the Group is committed to not promoting gaming activities except for informational purposes or to promote legal and responsible gaming.

For this purpose, the Group has established a Responsible Marketing Policy, which sets the standards for responsible communication. This policy defines principles related to product development and selection, information and communication about the products, and their marketing. The Group is committed to informing consumers about game regulations, general terms and conditions of the offer, and current provisions for the protection of legal gaming.

For the further protection of players, particularly the more vulnerable ones, the Group is also committed to running promotional, communication, and awareness campaigns. These campaigns will be socially oriented and aligned with the goal of promoting the prevention and counteraction of problem gaming.

The Group is also dedicated to promoting the National Toll-Free Telephone Line, which provides information about healthcare services for treating gaming-related issues.

3) PREVENTION AND MITIGATION OF IMPACTS

To prevent, measure, and mitigate the impacts of pathological gambling as much as possible, the Group is committed to monitoring gaming activities, aiming to prevent problematic behaviours within its technical and infrastructural capabilities, and in compliance with current regulations and personal data protection laws.

To achieve this, the Group is committed to adopting technologically advanced tools, particularly those leveraging artificial intelligence, to ensure the following in remote gaming operations:

- advanced technological tools are used, including predictive behavioural analysis, to identify potential risks of pathological gambling;
- risk indicators are used to identify potentially problematic gaming behaviours by players;
- specific alerts are implemented that are activated when players reach spending and time thresholds, taking into account the player's age and gaming habits, and in compliance with regulatory requirements;
- restrictive measures on gaming are activated if risk indicators for problematic gaming are exceeded;
- player-interaction systems are designed to highlight potential risks of problematic gaming and players are provided with contact channels for responsible gaming and prevention, in alignment with training programs;
- behavioural sciences are used to analyse gaming habits data, aimed at preventing the risk of pathological gambling;

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- compulsory self-limitation mechanisms are provided before the account is activated as defined by regulation and with special attention and special measures for players aged 18 to 24.

In developing their gaming offerings, the Group's companies adhere to the highest international standards and commit to adopting organisational forms and technical, technological, and IT tools designed to protect and safeguard players. These measures ensure the exclusion of minors from participating in games and help prevent the risk of developing gaming-related issues.

4) RESEARCH AND DEVELOPMENT

To strengthen its commitment to promoting Responsible Gaming (RG), the Group collaborates closely with medical research institutions and universities that focus on this area. This cooperation aims to:

- support clinical and research activities aimed at the prevention, treatment, and management of pathological addiction disorders;
- contribute to the development of studies and research in the field;
- support stakeholder awareness through scientific and measurable evidence;
- consolidate the continuous improvement of its activities and initiatives through ongoing benchmarking with national and international operators.

For this purpose, the Group also promotes activities in collaboration with other industry operators through membership associations.

6 Protection of Gaming Addicts

The Group pays special attention to its employees and their acquaintances and family members.

In the event of a need for support for problem gaming, the Group provides assistance through anonymous channels on the intranet, facilitating contact with leading specialised addiction treatment centres.

7 Reporting

The Group is committed to reporting its performance in managing Responsible Gaming impacts through documentation that covers management and monitoring, identified risks, evaluation results, and mitigation actions. These reports are made available to stakeholders on the Group's website and are also submitted to leading certification bodies.

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8 Dissemination and Updating

This policy is disseminated to all employees, including through specific training sessions according to their areas of operation, roles and responsibilities, and is made available on the company intranet and corporate website to all stakeholders, including collaborators and suppliers.

This policy will be assessed at least once a year taking into account the specific legislation on the subject, the evidence from audits (assessment) and the monitoring of national and international trends on the subject.

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