

RESPONSIBLE MARKETING POLICY

Approved by the Board of Directors

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

1 Recitals

Lottomatica Group S.p.A. and its subsidiaries (collectively referred to as the “Group”) are dedicated to a sustainable development strategy to ensure the long-term future of the gaming industry. As a leading player in Italy, the Group aims to set a high standard by fostering innovation and excellence in business while respecting all stakeholders, both within and outside the company. We place a strong emphasis on ensuring that gaming remains a form of entertainment that is healthy, safe, and responsible.

For this reason, the company operates according to the highest ethical and moral standards throughout the value chain, actively listening to and addressing the needs of its customers and employees. In managing its business, the Group prioritises player protection throughout every stage of their customer experience. This commitment spans from the selection and development of products to their promotion across all channels and contact points with end customers and, more broadly, with consumers.

2 Purpose of the Policy

This document establishes standards for responsible marketing, outlining principles for product development and selection, product information and communication, and marketing. It ensures compliance with current legislation and reflects the company’s commitment to promoting Responsible Gaming as a cornerstone of business sustainability.

This commitment is reinforced by specific procedures dedicated to Responsible Gaming and the Group’s Responsible Gaming Policy, which further strengthens oversight of these activities.

3 Field of application

This policy applies to all Group companies and, therefore, to all employees, collaborators, and suppliers, with particular reference to business management and promotion activities and the associated functions involved.

This policy complements the current regulations governing regulated money gaming practices and the constraints and requirements outlined in various contracts. Its aim is to support the compliance of all business initiatives with the Group’s commitment to Responsible Gaming, including its related objectives and programs.

Specifically, all companies within the Group operate and communicate their activities in strict compliance with the following regulatory requirements:

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- The so-called Balduzzi Decree-Law (Article 7 of Legislative Decree 158/2012), which introduced a ban on advertising messages for money games;
- The so-called Dignity Decree (Legislative Decree 87 of 12 July 2018, converted with amendments by Law 96 of 9 August 2018), which extended this ban to "any form of advertising, including indirect advertising [...] carried out in any medium, including sporting, cultural, or artistic events, television or radio broadcasts, newspapers and magazines, general publications, billboards, and the internet"; and introduced additional informational obligations towards VLT and AWP customers (Article 9-bis, paragraphs 4 and 5);
- Legislative Decree 41 of 23 March 2024, "Provisions for the reorganisation of the gaming sector, starting with remote games", pursuant to Article 15 of Law 111 of 9 August 2023, requires an obligation to invest in informational campaigns or responsible communication initiatives in accordance with the relevant authorities.

The Group is also committed to implementing communication and informational initiatives based on the guidelines provided by the Observatory established under Article 7, paragraph 10, of Decree-Law 158 of 13 September 2012, as converted with amendments by Decree-Law 189 of 8 November 2012.

4 General Principles

In managing its business activities, the Group is committed to pursuing sustainable growth by adhering to the following principles:

RESPECT FOR THE LEGALITY

The Group, which includes state-concessionaire companies, operates in the gaming sector within a defined regulatory framework established and overseen by the institutions, particularly the Customs and Monopolies Agency. This authority serves as both the licensing authority and the primary contact for all major business projects and innovations.

The Group is not just a guardian of legality but an active partner with institutions and regulators. By sharing its expertise and resources, anticipating trends and stakeholder needs, and contributing to the sector's development in line with market dynamics, the Group ensures ongoing and rigorous compliance with legal requirements concerning anti-money laundering, anti-corruption, privacy protection, and the prevention of underage and problematic gaming.

Any business initiative or program undertaken by the Group ensures compliance with current laws, sector regulations, contractual obligations, and all other codes and policies in force within the company.

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TRANSPARENCY

The Group promotes and implements the concept of transparency across all its operations, with particular emphasis on information and communication with its key stakeholders: customers, regulatory authorities, institutions, local communities, business partners, and suppliers.

In line with the principle of transparency, the Group has adopted a Code of Ethics, and the Lottomatica Group companies engaged in significant activities have each implemented an Organisational, Management, and Control Model under Legislative Decree 231/01. This Model is based on a structured and comprehensive system of documents, including procedures and operational instructions, to ensure that the conduct of everyone acting on its behalf or in its interest always complies with the principles of fairness and transparency in the management of business and corporate activities.

With specific reference to players, it is mandatory that the terms of offers, game conditions, and the presentation of new features are always represented clearly, truthfully, and unambiguously. Additionally, both informational and product content must be continuously updated and communicated using balanced and understandable language to facilitate a healthy and informed approach to gaming.

ATTENTION TO MINORS

The Group views Responsible Gaming as a key component of its sustainable business strategy. To support this, it promotes and implements a comprehensive set of initiatives designed to, among other goals, prevent underage access to gaming both online and at physical locations.

In retail locations, there is a strong emphasis on preventing underage gaming through targeted measures. Online, strict technological controls and platform certifications ensure that the internet remains a secure environment, inaccessible to minors.

Products and programs are designed to avoid using content and language that might entice or appeal to children and minors. All communications explicitly include a prohibition on underage gaming, clearly identified with the relevant logo.

CAUTION TO EXCESSIVE GAMING

In line with the Group's Responsible Gaming Policy, as well as the procedures and operational instructions of its various companies aimed at preventing excessive gaming, the Group is committed to avoiding any initiatives or messages that could be misleading regarding gaming. To this end, it undertakes to communicate any initiative while refraining from:

- encouraging excessive and uncontrolled gaming;
- denying that gaming can entail risks, including that of addiction;

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- regarding gaming as a way of solving financial or personal problems or a source of income or livelihood as an alternative to work;
- addressing or relating to minors;
- depicting refraining from gaming as a negative value.

In addition to promoting the Group's efforts to identify and address problem gaming, such as self-assessment tests, staff training, and support for organisations dedicated to the prevention and treating of gambling addiction, the company is committed to achieving its development goals through sustainable initiatives that target informed and responsible consumers.

PROMOTION OF A RESPONSIBLE GAMING MODEL

The Group promotes a model of responsible and conscious gaming by providing its customers with clear, comprehensive, and impartial information, as well as tools to identify and prevent problematic gaming. In this context, the Group has also developed a Responsible Gaming Code, which is shared in all gaming contexts and outlines the rules of conduct to ensure that gaming remains enjoyable. Additionally, the Group is committed to promoting a healthy approach to gaming through corporate campaigns.

RESPECT FOR THE TERRITORY

To create sustainable value for all its stakeholders, the Group is dedicated to enhancing quality of life, supporting socio-economic development in the communities where it operates, and fostering local talent and skills. At the same time, it ensures that its business activities align with sound business practices and contribute to economic growth.

In this regard, choosing locations for operational offices, retail outlets, or corners must take into account the social and urban setting of the area. For retail locations, this means assessing safety and proximity to sensitive areas, working with local authorities, and adhering to current regulations.

5 Guidelines

Below are the principles and guidelines for all market segments where the Group operates, covering (i) the development of gaming products, (ii) communication and information specifically for players and more broadly for potential users, and (iii) promoting initiatives through both physical and online channels. These guidelines are designed to assist all stakeholders in the supply chain through every stage of the process, with a strong focus on the customer.

1. DEVELOPMENT OF THE OFFER

- All gaming products are previously assessed, certified and approved by the Customs and Monopolies Agency (ADM);

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- Games respect the payout established by the regulator;
- All gaming products ensure player security through internal or third-party technology solutions that ensure the fairness and integrity of transactions;
- All gaming products comply with the principles of fairness and transparency towards players and institutions;
- Gaming products protect vulnerable groups, minors and respect cultural diversity;
- When designing gaming offerings, all best practices are followed to prevent the harms associated with gaming;

2. COMMUNICATION and INFORMATION

The communication regarding the Group's gaming offerings aims to provide transparent information to ensure that recipients do not misinterpret the message due to omissions, ambiguities, or exaggerations related to features, costs, chances of winning, or bonus conditions.

- All online and offline communication must have the sole purpose of informing customers;
- The communication must be transparent, comprehensive, clear, and unequivocal, and it should always define the commitment required from the player to take advantage of an offer;
- The language used must align with the informative purpose of the message;
- All information about games must be easily and immediately accessible and supported by documentary evidence;
- All communications should respect and reflect diverse cultural values (including those related to gender, race, sexual orientation, and religion);
- Communications about gaming should never target minors. Testimonial or speakers under 25 years old should not be used, and advertising should not appear on sites aimed at minors. Additionally, age-gating should be implemented for any content on social media platforms or YouTube;
- Communications should always include the terms associated with the offers, ensuring transparency and completeness;
- It is essential to inform players about tools to counteract potential problematic behaviour, including references to support lines or services for gambling disorders;
- All communications must respect consumer privacy and include a clear and transparent mechanism for opting out of receiving commercial messages;
- Communications must not be addressed to vulnerable persons;

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- Communications should promote healthy and responsible gaming, avoid any association with products such as alcohol or tobacco, and always include the 18+ logo and the “Play Responsibly” message.

The Group is also committed to running informative campaigns about the risks of problem gaming, ensuring that contact channels for prevention and treatment of gambling addiction (GAP) are always available, and raising awareness among consumers about tools that promote responsible gaming.

3. SALES CHANNELS

RETAIL CHANNEL

- The location of sales outlets must adhere to national, regional and municipal regulations regarding proximity to sensitive places;
- Dedicated sales outlets must clearly and visibly indicate that access is restricted to adults only, including through staff supervision;
- Minors must be barred from accessing cash prize gaming at general sales outlets, and this restriction must be clearly visible to customers;
- Accurate information should be provided on tools and resources available to address potential gaming problems;
- Players must be clearly informed about the game rules, the odds of winning, and the process for claiming their winnings;
- Players should be informed about the gaming options available at the sales points;
- The privacy of players must always be protected and respected;
- Ongoing dialogue and coordination should be encouraged to facilitate feedback and interaction between the sales network and the company, with a particular focus on responsible gaming;
- In retail locations, commercial communication must not:
 1. Make reference to immediately usable credit services for gaming purposes;
 2. Exploit sports enthusiasm to suggest that those who love sports cannot do without gambling, equating sports skill with gaming skill.

ONLINE CHANNELS

- To access the online game, players must be over 18, register with their personal details, and set their financial limits;
- Players should be able to log out of online play for temporary or permanent periods and must receive clear information on how to do this;
- The gaming offer must always be clearly, exhaustively, and unambiguously stated;

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- The privacy of players must always be protected and respected;
- Customers whose gaming practices are considered abnormal may be banned from online gaming;
- Accurate information should be provided on tools and resources available to address potential gaming problems;
- Gaming and betting rules must always be clear and accessible;
- The odds of winning must be available for consultation at any time;
- The “responsible gaming” section should be easily accessible and user-friendly for all visitors.

6 Dissemination and Updating

This policy is available on the corporate website, the company intranet, and with the business function managers, who ensure its dissemination and awareness among employees within their organisational structures, as well as its implementation within their areas of responsibility. Awareness of and compliance with the policy extend to all relevant parties, including external suppliers, business partners, creative agencies, and others.

The Policy is periodically updated based on recommendations from the ESG Committee to reflect changes in relevant legislation, the company's Responsible Gaming policies, and industry trends.

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