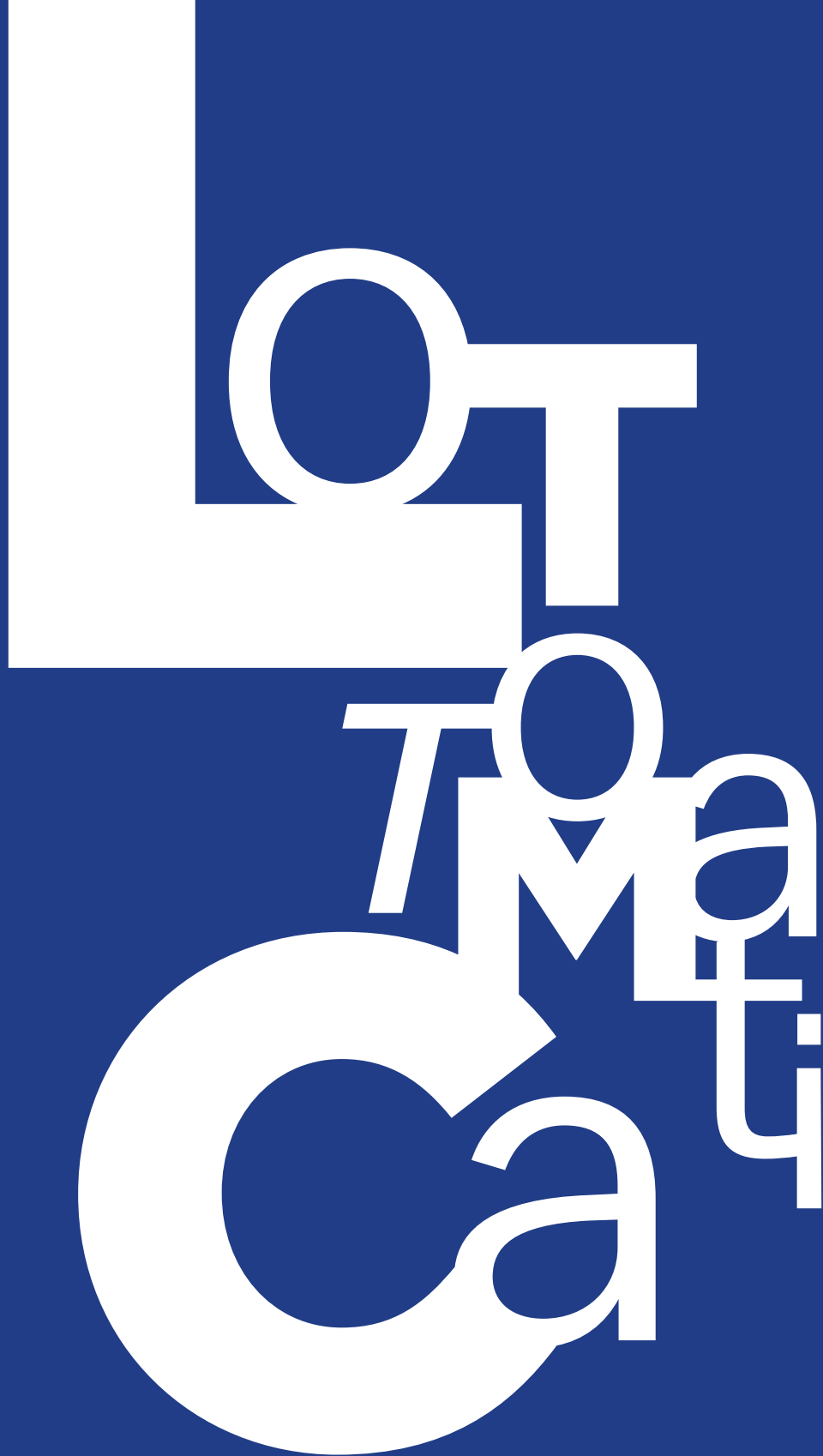




Consolidated Sustainability Statement

EXCERPT FROM THE ANNUAL REPORT 2024

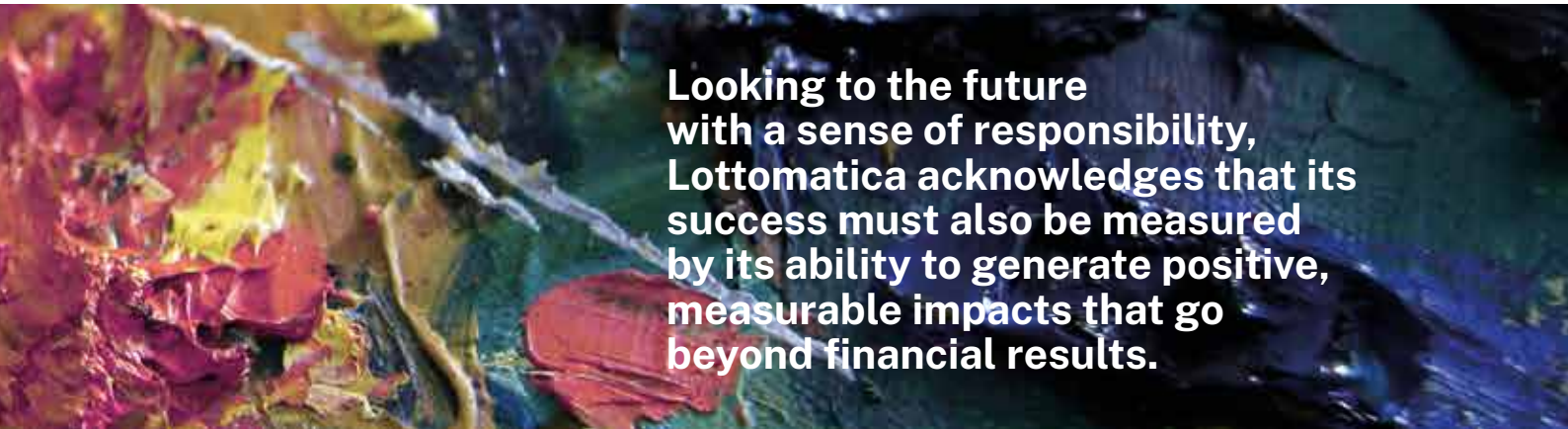
LOTTOMatica

Consolidated sustainability statement

1. General information

Generating sustainable value and delivering safe, innovative gaming experiences are at the core of Lottomatica's mission. 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 robust governance and a comprehensive ESG strategy, designed to integrate sustainability drivers into its business model. This strategy comprises an extensive Sustainability Plan—centred around the strategic pillars of Responsibility, People, Community, and Environment—as well as a set of dedicated Policies and Programmes.

As a leading player in the public gaming sector, Lottomatica recognises its role in combating climate change and fostering responsible practices throughout the value chain. In 2024, the Group introduced a targeted environmental sustainability strategy aimed at significantly reducing its carbon footprint over the medium term, while encouraging sustainable conduct across its supply chain. Lottomatica's commitment also extends to creating value for the community through projects that aim to stimulate socio-economic development in the regions where it operates, enhance quality of life, promote human capital development, and actively engage stakeholders and employees.



Looking to the future with a sense of responsibility, Lottomatica acknowledges that its success must also be measured by its ability to generate positive, measurable impacts that go beyond financial results.

Lottomatica also actively pursues public interest objectives, including the protection of legality and consumer rights, with a particular focus on safeguarding minors, namely through the promotion of a robust model of legal and responsible gaming that has been fully integrated within its strategies and daily operations, and by adopting the highest standards of ethics and integrity through a robust governance framework designed to protect all stakeholders.

Looking to the future with a sense of responsibility, Lottomatica acknowledges that its success must also be measured by its ability to generate positive, measurable impacts that go beyond financial results. To ensure transparency and integrity in its ESG performance, this Consolidated sustainability statement has been prepared in compliance with the requirements of the Corporate Sustainability Reporting Directive (CSRD) and Legislative Decree 125/2024, as well as the European Sustainability Reporting Standards (ESRS).

1.1 Basis for preparation

Disclosure
requirement
BP-1

General basis for preparation of the Consolidated sustainability statement

Lottomatica Group's 2024 Sustainability statement has been **prepared on a consolidated basis**, with the reporting boundary (including the Parent Company and all fully consolidated entities) aligned with that of the consolidated financial statements. The Consolidated sustainability statement also includes information on **Lottomatica's value chain**, identified based on the guidance provided by EFRAG to ensure compliance with article 29 (a) (3) of the Corporate Sustainability Reporting Directive. In particular, the information required by the principles concerning upstream and downstream actors in the value chain has been reported in this document, concerning:

- the double materiality analysis process, with a focus on identifying material impacts, risks, and opportunities;
- the Group's policies, actions, and objectives, with varying levels of detail depending on the degree of control and influence;
- the identification of key metrics, particularly concerning Scope 3 emissions reporting.

For the period under review, it should be noted that no information has been omitted from this document due to intellectual property concerns, innovation-related confidentiality, or ongoing developments and negotiations. Likewise, some voluntary information deemed necessary for a comprehensive representation of the Group's sustainability commitments and achievements has been included.

Disclosure
requirement
BP-2

Disclosures in relation to specific circumstances

Lottomatica Group has aligned its **time horizons** with the Group's Enterprise Risk Management (ERM) model: defining short-term as 1 year, medium-term as 1 to 3 years, and long-term as more than 3 years. While this approach differs from the time frames established by ESRS 1, it reflects the periods used in the Group's financial statements and strategic planning. Finally, it is specified that the time horizons considered in the Climate Risk Assessment do not coincide with those indicated throughout the Consolidated sustainability statement and are as follows: 2025 for the short term, 2030 for the medium term and 2050 for the long term.

Estimates

Estimates were used for the performance metrics related to waste data, the gender pay gap, average supplier payment time, and Scope 1, 2, and 3 emissions. Further details in this regard are provided in the relative sections.¹³

¹³ For more details on the calculation methodologies used, please refer to the following paragraphs: E1-6 (Scope 3); E5-5 (waste); S1-15 (gender pay gap); G1-6 (average payment time).



Disclosures required by other legislation or sustainability provisions

The reporting of certain information was also done in consideration of other recognised regulations, standards and frameworks for sustainability reporting, such as the EU Regulation 2020/852 (EU Taxonomy), the UN Global Compact (UNGC), the Greenhouse Gas Protocol (GHG Protocol) and ISO 14064:2018.

Transitory provisions

The Group has opted to apply the phase-in provisions outlined in Appendix C of ESRS 1, applicable to Lottomatica, with the exception of the following requirements: E1-9 “Potential financial effects from material physical and transition risks and potential climate-related opportunities”, with specific reference to requirement 65 a); S1-7 “Characteristics of non-employee workers in the undertaking’s own workforce”; S1-8 “Collective bargaining coverage and social dialogue”; S1-11 “Social protection”; S1-12 “Persons with disabilities”; S1-13 “Training and skills development metrics”; S1-14 “Cases of occupational illness, number of days lost and information about non-employee workers”; S1-15 “Work-life balance”.

Further considerations

It should be noted that for the purpose of preparing this Sustainability Statement, the first in line with CSRD and ESRS, no comparative data were provided as required by ESRS 2-BP 2, and ESRS relating to changes and reporting errors in previous periods are not considered applicable. Furthermore, there are no references to sections of the Annual Report or external corporate documents. With reference to the future financial resources that are expected to be allocated to the actions reported within the ESRS topics, it is specified that the amount reported currently refers to what is estimated for 2025. With reference to the metrics reported in the chapters “Environmental Information”, “Social Information” and “Governance Information”, it is specified that the data has not been subjected to an independent audit by an external body.

1.2 Governance

The role of the administrative, management and supervisory bodies

Disclosure
requirement
GOV-1

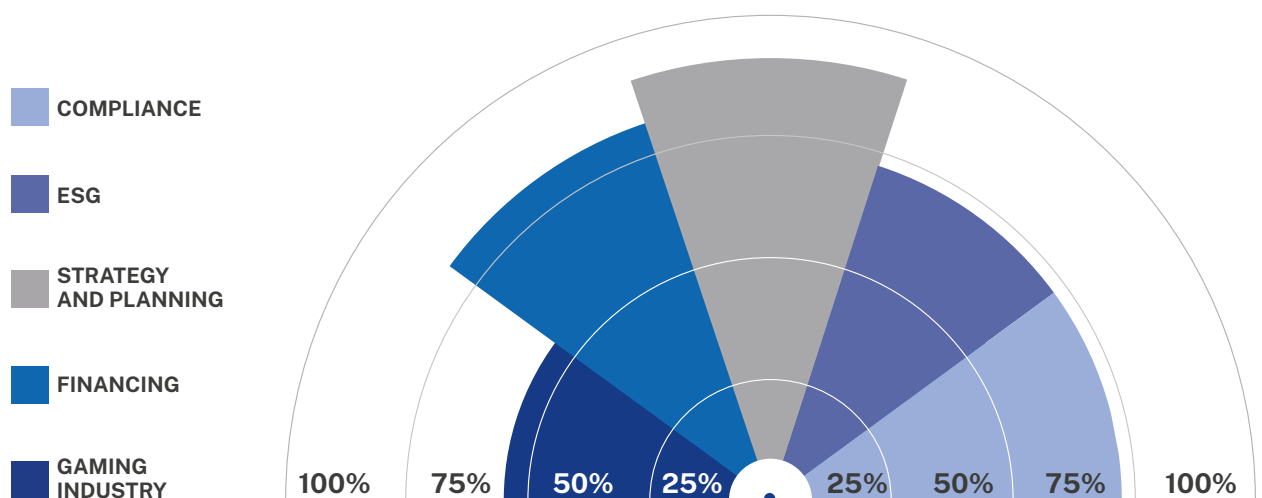
The Parent Company, Lottomatica Group, has adopted the **traditional Italian administration and control system**, consisting of **two corporate bodies** appointed by the Shareholders’ Meeting: **the Board of Directors**, made up of 11 members with broad authority over the Company’s ordinary and extraordinary administration, and **the Board of Statutory Auditors**, made up 3 standing auditors and 2 alternates, responsible for overseeing administrative practices and ensuring compliance with legal and statutory requirements. The Board of Directors is also responsible for determining and overseeing the management and coordination activities among the other Group companies.

Administrative, management and control bodies	u.m.	2024		
		Men	Women	Total
Members of the administrative, management, and control bodies		7	7	14
Of which executives	No.	1	0	1
Of which non-executives		6	7	13

At 31 December 2024, the Board of Directors had an **average age of 52**, with **women¹⁴ representing 55%** of the members and **36% classified as independent** pursuant to the Consolidated Law on Finance and the Corporate Governance Code.

Members of the Board of Directors	u.m.	2024		
		Men	Women	Total
Members of the Board of Directors		5	6	11
Of which executives	No.	1	0	1
Of which non-executives		4	6	10
Of which independent		0	4	4
Gender diversity ¹⁵	%		120	
Independent members			36	

In addition to meeting the general knowledge requirements mandated by the current legislation, the members of the Board of Directors have also acquired expertise in the areas illustrated in the chart below. Specifically, besides professionals working in the **legal and financial fields**, there are professionals with experience in the **gaming sector in which the Group operates** and in **strategy and planning**, as well as in the **ESG field**, including aspects of climate change, human rights and business conduct. In addition to the presence of members with foreign nationality, the international scope is also ensured by members with solid experience in international contexts.



To ensure that members of the management and control bodies have the necessary skills and competencies, they are encouraged to participate in initiatives that enhance their understanding of the Company's business sectors, corporate dynamics, and their evolution, including from a sustainability perspective, as well as the principles of effective risk management and the relevant regulatory frameworks. To support this objective, the Chairman of the Board of Directors, with the assistance of the Secretary and the active involvement of the senior management, developed and implemented a **training plan for the Board**, known as the "Board Induction" plan. Moreover, in line with the international best practices, ongoing training sessions are conducted throughout their

14) For more detailed information on the Group Board of Directors' Diversity Policy, please refer to the "Summary of Policies" section in the "General Information" chapter.

15) Gender diversity within the Board of Directors is calculated as the average ratio of female to male members.



terms of office to provide greater insights on key topics. At the recommendation of Lottomatica's ESG Committee, a dedicated induction session was also held during the course of the year focusing on –among other things– ESG issues, particularly the implications of the entry into force of the European Directive on Corporate Sustainability Reporting Directive. This session was attended by members of both the Board of Directors and the Board of Statutory Auditors. Finally, the Board of Directors regularly receives periodical updates on the ESG Committee's activities and the progress of the corporate Sustainability Plan.

In keeping with the guidelines of the Corporate Governance Code, Lottomatica Group is committed to **ensuring corporate integrity and full transparency** in decision-making, including the **management of sustainability-related impacts, risks and opportunities**. Moreover, the Company has adopted a mission that aligns with the **17 Sustainable Development Goals**, encompassing all aspects of social, economic, and environmental development to which Lottomatica is dedicated to actively contributing, in an integrated and cohesive manner. In this regard, Lottomatica Group's governance bodies and structures have the ESG responsibilities listed below:

- The **Board of Directors**, with a **strategic role** and a **position of absolute centrality** in the Company's Corporate Governance system, with wide-ranging competences, also with regard to the organisation of the Company and the Group and the Internal Control and Risk Management System. The Board also has a central role in defining, on the proposal of the Chief Executive Officer, the strategic lines and objectives of the Company and the Group, pursuing their **sustainable success** – understood as the creation of value in the long term for the benefit of the shareholders and taking into account the interests of the other stakeholders relevant to Lottomatica – and constantly monitoring their implementation. The Board of Directors, in particular, defines and approves the Company's and the Group's **strategic guidelines**, which also include the **objectives of the Sustainability Plan**, as well as the nature and level of risk compatible with such strategic guidelines, taking into account all the elements that may be relevant with a view to sustainable success. The Board of Directors reviews and approves the **Five-Year Business Plan** for the Company and the Group, along with the corresponding budgets, taking into account factors that influence long-term value creation. Supported by the ESG Committee, the Board also periodically monitors the implementation of these plans and evaluates overall performance, consistently comparing the actual results with the planned objectives. The Board also determines the nature and risk level compatible with the Company's strategic goals, considering all factors that could impact the Company's sustainable success.

In its activities, **the Board of Directors is supported by Committees** that analyse, each one for their respective areas of competence, issues relevant to the generation of long-term value:

- The **Board's Internal ESG Committee**, made up of three members with multidisciplinary expertise, including sustainability, supports the Board of Directors in tasks related to **promoting the integration of sustainability into the Group's strategy and corporate culture**, overseeing how ESG issues are integrated into the business model, and ensuring their communication to all stakeholders. It also provides preliminary, proactive and consultancy support regarding the sustainability guidelines and objectives, overseeing the initiatives and programmes promoted by the Company aimed at achieving them, monitoring the relative results, and ensuring a continuous dialogue with the stakeholders. The ESG Committee is also in charge of reviewing and assessing the evolution of international sustainability trends and principles, providing guidelines for the adjustment of medium-long term strategies and monitoring the progress

of actions undertaken, as well as reviewing the Consolidated sustainability statement and assessing the eligibility of periodic non-financial information. Lastly, the ESG Committee carries out its activities by interacting with the Company's operational and managerial Sustainability Committee and, more generally, with any corporate function in charge of the governance of ESG strategies and programmes, and reports to the Board on its activities at least once a year, submitting a report on its activities to the Board of Directors.

- The **Control and Risk Advisory Committee** assists the Board of Directors by providing investigative, propositional, and advisory support in **evaluating and making decisions about the internal control and risk management system**, as well as in approving the periodic financial reports. Its responsibilities include:
 - establishing guidelines for the internal control and risk management system, in alignment with the Company's strategies;
 - conducting at least an annual assessment of the adequacy and effectiveness of the internal control and risk management system, considering the Company's specific characteristics and risk profile.

To further support these areas, the Group includes the involvement of the following bodies: the ESG Office, the ESG Managerial Operating Committee, the Environmental Sustainability Committee, the Responsible Gaming Committee, the Diversity & Inclusion Committee, and the Gender Equity Steering Committee. Furthermore, in line with regulatory requirements, a Non-Financial Reporting Officer was identified, a figure coinciding with the Financial Reporting Officer.

Disclosure
requirement
GOV-2

Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

Lottomatica recognises the importance of consistently informing the administrative, management, and control bodies, as well as their respective Committees, about the implementation of the Company's sustainability policies and the outcomes and effectiveness of the actions taken. This approach ensures that business decisions are supported by a **thorough assessment** of the risks and opportunities, thus ensuring **proactive and well-informed management** of ESG issues. In line with this commitment, the Board of Directors continuously monitors material impacts, risks, and opportunities through its advisory committees, mainly the Audit and Risk Committee and the ESG Committee. These committees convene regularly, engaging with the Company's management for detailed analyses and updates on the business activities. Every six months, they provide the Board of Directors with a comprehensive report detailing the activities conducted, the results of the controls performed, analyses of impacts, risks, and opportunities, and any critical issues requiring the Board's attention. The Board of Directors is responsible for considering these impacts, risks, and opportunities when shaping the Company's strategy and making decisions on significant operations, relying on periodic reports from the CEO, in accordance with Article 2381 of the Italian Civil Code. With particular regard to 2024, through the collaborative efforts of the Control and Risk Committee and the ESG Committee, the Board of Directors closely monitored the assessment of climate change related impact on the Lottomatica Group companies' operations. This assessment led to the revision and integration of that risk into the Group's Enterprise Risk Model.



Integration of sustainability-related performance in incentive schemes

Disclosure
requirement
GOV-3

Lottomatica Group's Remuneration Policy, applicable to **members of the Board of Directors**, **Statutory Auditors**, and **Executives** with **Strategic Responsibilities** (ESR), supports the achievement of the Company's strategic objectives through short-and long-term incentive systems and the establishment of performance targets to promote the creation of sustainable value for shareholders and other stakeholders. The 2024 incentive schemes include the following key components:

- Short Term Incentive (STI), which utilises a range of operational, financial, and non-financial KPIs to provide a comprehensive performance assessment, including:
 - Management by Objectives (MBO), covering both basic and extra-performance goals;
 - VIP Incentive Plan;
 - Sales Incentive Plan (SIP);
 - Collector Incentive Plan.
- Long Term Incentive (LTI), designed as a three-year stock option plan with vesting conditions tied to financial, market, and sustainability KPIs. This includes a two-year lock-up mechanism to enhance retention and promote alignment with the Company's strategic goals:
 - Cumulative EBITDA;
 - Total Shareholder Return (TSR) vs Gaming Peers;
 - Total Shareholder Return (TSR) vs FTSE MIB;
 - Bonus/Malus ESG.

In 2024, the Board of Directors approved and updated the terms of the sustainability-related incentive schemes, allocating a substantial portion of the incentive targets to sustainability KPIs, including:

- *reduction of environmental impacts*: lowering emissions through the adoption of a decarbonisation strategy and roadmap;
- *inclusion and diversity*: implementing gender equality training in recruitment and promotion processes and organising a programme to enhance the female leadership pipeline;
- *responsible gaming*: launching awareness campaigns and developing an analytical tool in collaboration with CePID (Gemelli) to identify online gamblers at risk.

These sustainability metrics have been integrated into both the STI and LTI systems as follows:

- within the STI plan, ESG KPIs constitute a significant portion of the target sheet, accounting for an average 15% of the variable remuneration, which reaches 20% for top management;
- in the LTI plan, the achievement of ESG targets directly influences the allocation of stock options through a bonus/malus mechanism.

Disclosure
requirement
GOV-4

Statement on due diligence

Key elements of sustainability due diligence	Disclosure requirements	Page	Disclosure concerning	
			People	Environment
a. Integration of due diligence into governance, strategy, and the business model	ESRS 2 GOV-2	58	X	X
	ESRS 2 GOV-3	59	X	X
	ESRS 2 SBM-3	72-75	X	X
	ESRS 2 SBM-3-E1	110		X
	ESRS 2 SBM-3-S1	131-132	X	
	ESRS 2 SBM-3-S2	157	X	
	ESRS 2 SBM-3-S4	165-166	X	
b. Stakeholder involvement	ESRS 2 GOV-2	58	X	X
	ESRS 2 SBM-2	70-71	X	X
	ESRS 2 IRO-1	76-80	X	X
	ESRS 2 IRO-2	86-88	X	X
	ESRS 2 MDR-P	81-85	X	X
	S1-2	137-138	X	
	S2-2	158-159	X	
c. Identification and assessment of negative impacts on people and the environment	S4-2	167	X	
	ESRS 2 IRO-1	76-80	X	X
	ESRS 2 SBM-3	72-75	X	X
	ESRS 2 SBM-3-E1	110		X
	ESRS 2 SBM-3-S1	131-132	X	
	ESRS 2 SBM-3-S2	157	X	
d. Implementation of measures to mitigate negative impacts	ESRS 2 SBM-3-S4	165-166	X	
	E1-1	108-109		X
	E1-3	111-113		X
	E5-2	121-125		X
	S1-4	141-149	X	
	S2-4	160-161	X	
e. Monitoring the effectiveness of these measures	S4-4	168-171	X	
	MDR-T/E1-4	113-115		X
	MDR-T/S1-5	149	X	
	E1-6	116-120		X
	E5-5	125-126		X
	S1-6	150	X	
	S1-8	151	X	
	S1-10	152-153	X	
	S1-11	153	X	
	S1-14	155	X	
	S1-16	156	X	
	S1-17	156-157	X	



Risk management and internal controls over sustainability reporting

Disclosure
requirement
GOV-5

In response to recent developments in sustainability reporting regulations, Lottomatica launched a comprehensive project in 2024 to adapt its sustainability reporting process to comply with Legislative Decree 125/2024 and the new European Sustainability Reporting Standards (ESRS). As part of this initiative, Lottomatica began designing and gradually implementing a **sustainability reporting control** model to ensure the **reliability** of sustainability information and its **adherence** to the reporting standards.

From a governance perspective, this model also aims to support Lottomatica's Chief Executive Officer and Financial Reporting Officer in drafting Lottomatica's corporate accounting documents and in certifying to the Market that Lottomatica's Sustainability Reporting complies with the European Reporting Standards (ESRS) and the requirements laid out under article 8(4) of Regulation (EU) 2020/852, commonly known as the EU taxonomy. Regarding this matter, on 5 February 2025, the Board of Directors approved an updated version of the "Responsible Manager Regulation," incorporating aspects related to sustainability reporting.

The control model for sustainability reporting defined by Lottomatica considered the principles established by national and international best practices, particularly those outlined by the *Committee of Sponsoring Organisations of the Treadway Commission* (CoSO). In March 2023, CoSO published a specific supplementary guide on sustainability reporting titled "*Achieving Effective Internal Control of Sustainability Reporting* (ICSR)". In alignment with the CoSO Report principles, the methodology used for risk assessment and prioritisation is based on the following approach:

- Determination of the scope of analysis: this is determined by the subject indicators presented in Lottomatica's Sustainability Report, prepared in accordance with Legislative Decree no. 125/2024.
- Risk analysis: Indicators are evaluated and ranked based on a risk/relevance analysis, considering the following key drivers:
 - centrality of the KPI to Lottomatica's sustainability policies;
 - significance of the KPI with respect to the ratings by rating agencies;
 - relevance of the KPI with respect to potential reputational impacts;
 - relevance of the KPI to managerial incentives;
 - complexity of the KPI.

For indicators identified as having a higher risk/relevance and for the Group companies significantly contributing to these indicators, Lottomatica's approach involves analysing the business processes from which these indicators originate. This includes assessing the risks of non-compliance with the relevant requirements, faithful representation, comparability, verifiability, and comprehensibility, which are essential for sustainability information disclosed under the ESRS. It also includes evaluating the controls implemented to mitigate these risks. The outcome of this analysis consists of **procedures for the generation and communication of sustainability data and information** (referred to as KPI formation procedures). According to this approach, the primary risks identified are: completeness and integrity of data; accuracy of estimation results; precision and relevance of descriptions; and availability and timeliness of data, especially those involving third parties.

To address these risks, the following key **control measures** have been established:

- approval and management review controls;
- data reconciliation checks;
- automated checks to verify the correct calculation and entry of data into computer systems;
- controls on logical access to systems and traceability of operations performed on the system used for Sustainability Reporting;
- consistency checks of reported sustainability data with respect to the ESRS reference standards;
- analysis of data deviations from historical time series.

It should also be noted that Lottomatica's sustainability reporting process is managed using a **dedicated computer system**. This system has enhanced the efficiency and governance of the reporting process while also improving control processes through automated checks and detailed reports. Finally, the control model for sustainability reporting is integrated into Lottomatica's broader **Internal Control and Risk Management System** ("ICRM"), which includes the following key elements:

- the establishment of ethical values and conduct criteria, ensuring that employees and all individuals working towards the Company's objectives (including partners) adhere to these standards. This commitment is maintained through the guidelines provided in the Group Code of Ethics and the Anti-Bribery & Corruption Guidelines, approved by the Board of Directors on 27 February 2023: these guidelines apply to all subsidiaries and are communicated both internally and externally;
- roles and responsibilities, as well as the relationships between company departments and areas, are clearly defined within the established organisational structure. Signatory powers and internal delegations are aligned with the hierarchical level, the organisational unit overseen, and the assigned objectives.

In 2024, specific information flows were directed to the Administrative, Management, and Control Bodies to provide updates on the progress of the CSRD compliance programme, including the development of internal control and risk management processes related to sustainability reporting.



1.3 Strategy

Strategy, business model and value chain

Disclosure
requirement
SBM-1

Lottomatica Group is **Italy's leading operator** on the **public gaming** market, authorised by the Customs and Monopolies Agency (ADM). It operates through subsidiaries under the holding company Lottomatica Group S.p.A. At 31 December 2024, the Group employed **2,667 people**.

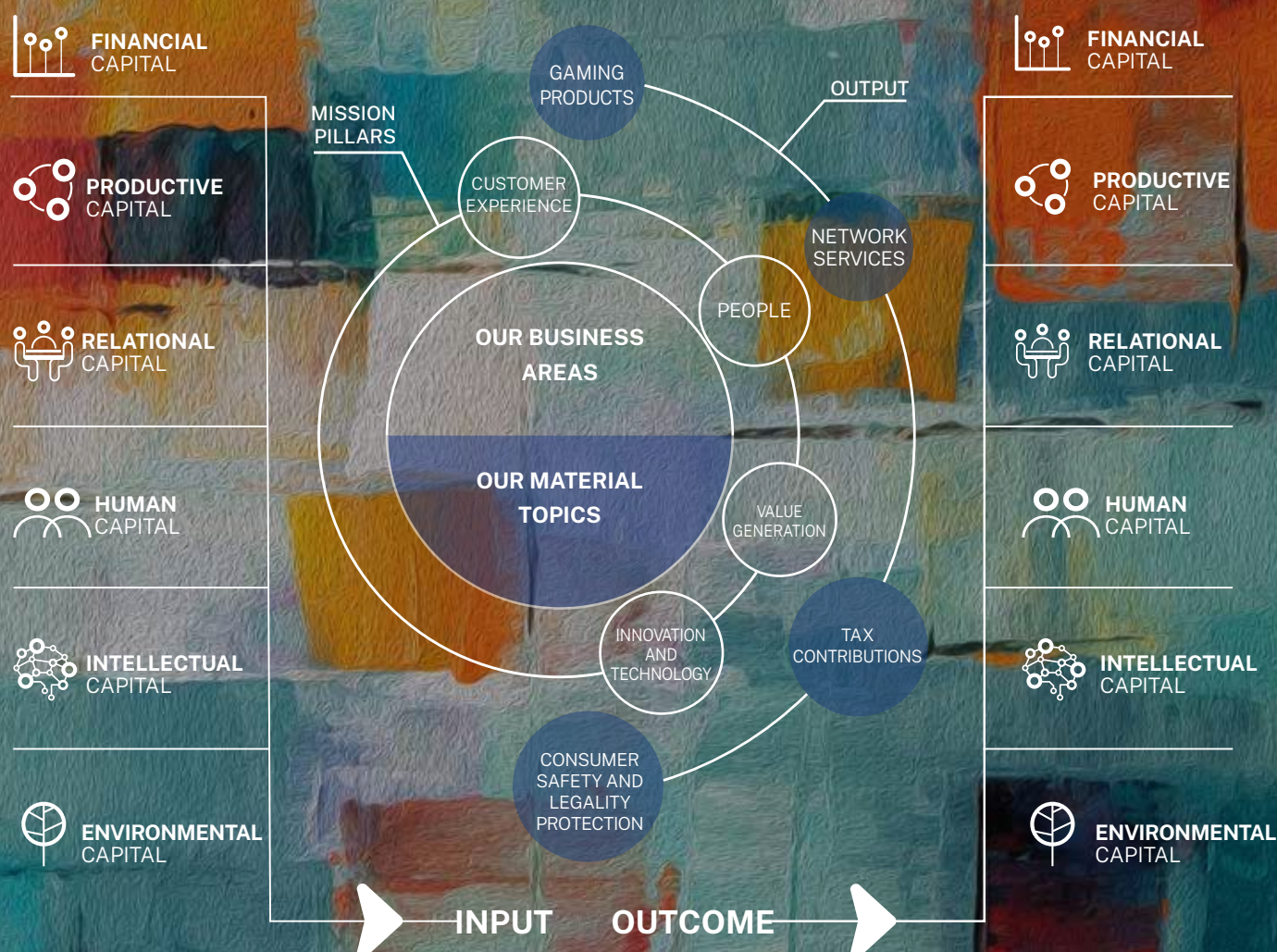
Employees by geographical areas	<i>u.m.</i>	2024
Northern Italy	No.	615
Central Italy		1,432
Southern Italy		205
Abroad		415
Total		2,667

Lottomatica conducts its activities on the basis of sound **principles of environmental, social and governance responsibility**, and believes that its success in **generating sustainable value** depends primarily on its ability to respond effectively to the demands posed by the context in which it operates, managing in a conscious and balanced manner **all forms of capital** involved in the creation of such value.

Specifically, Lottomatica Group identifies the following classes of capital:

- financial capital, which includes the equity, economic and financial resources necessary for the organisation's activities;
- production capital, which includes owned space and buildings, equipment and all the tangible assets functional to the performance of the activity;
- relational capital, which includes the set of relationships established by the Group;
- human capital, which includes the wealth of skills, abilities and knowledge of those who work for the Company;
- intellectual capital, which includes internal management processes and procedures, as well as intellectual property and information systems;
- environmental capital, which includes the environmental dimension on which the Group's activities impact.

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** (*outcome*), creating value for all stakeholders in the short, medium and long term.





In particular, Lottomatica operates in the following **business segments**, as defined by IFRS 8:

- Online, offering a wide range of online products, through the websites GoldBet.it, Better.it, Lottomatica.it, Betflag.it, Totosi.it, and Planetwin365.it. These are categorised as follows:
 - iSports: sports betting, virtual betting, and horse racing betting;
 - iGaming: online casino games;
 - other online products: including bingo, poker, betting exchange, and skill games.
- Sports Franchise, involving the collection of sports, virtual, and horse racing bets through a network of franchise outlets operated under the brands GoldBet, Intralot, Better, and Planetwin365.
- Gaming Franchise, primarily focused on managing concession activities for VLTs and AWP, as well as directly operating proprietary gaming halls and AWP.

In order to provide a comprehensive overview of its own business model, the Group conducted a **detailed mapping of its value chain** for the first time in 2024. This mapping was based on an analysis of internal documents, including the Annual Financial Report and records of the main operating and capital expenditure items. The activities and stakeholders involved throughout the three phases (own operations, upstream actors, and downstream actors) were mapped and organised according to the Group's operations, and in line with the criteria used in the reviewed financial documentation. In this breakdown, the activities were categorised based on relevance and dependence, considering their strategic importance to the Group and the extent to which the Group companies rely on the upstream and downstream stakeholders. The mapping of Lottomatica Group's value chain, organised by the three business sectors, is shown below.

Online

Lottomatica is Italy's leader in the online gaming segment, where it maintains a presence with the Lottomatica, Better, Goldbet, Betflag, and Planetwin365 brands. Having distinguished itself with the **highest security standards**, the Group's range of online products and services consists of a comprehensive and innovative portfolio of remote games, which can be enjoyed via the web, as well as through numerous dedicated apps for smartphones and tablets. The online games have been authorised and certified by Italy's **Customs and Monopolies Agency** to guarantee the highest levels of security, and are provided by select international partners, who not only offer the most popular content, but also the most secure and reliable gaming platforms.

Upstream			Own operations	Downstream
Tier 3	Tier 2	Tier 1	Betting and online gaming	Customers
- Suppliers of raw materials (for energy production and manufactured goods) - Manufacturers of hardware components	- Software development companies - Hardware suppliers and manufacturers (e.g. PCs and other components) - Computer servers - Certification and authorisation bodies (e.g. ADM) Tier 2 physical point-of-sale network - Odds makers - Game software suppliers (virtual games) - Suppliers of other software (management software, applications) - Hardware suppliers (e.g. totems, gaming hall terminals) - Computer servers - Gaming hall furnishings and accessories - Ho.Re.Ca. suppliers - Marketing and communication - Certification and authorisation bodies - Point-of-sale operators	- Odds makers - Gaming software providers (skill games, casino games, virtual games) - Suppliers of other software (management software, applications) - Suppliers of computer hardware (e.g. PCs) - Computer servers - Certification and authorisation bodies - Marketing and communication - Physical point-of-sale network	Primary operations - Sports betting - Skill games / casino games - Virtual games Secondary operations - Game software development (skill games, casino games)	Primary customers - Player Secondary customers - Concessionaires and providers of skill games End-users - Player
Provision of services (utilities, waste, consultancy) - Utilities - Waste management - Consultancy (IT, legal, communication, etc.) - Electronic money institutions / financial intermediation				

- The operations of the Online segment primarily involve offering betting and online games (including skill games / casino games, and virtual games) on the Group's websites. Although minimal, B2B activities within this segment are also considered for mapping purposes. These activities are mainly carried out by subsidiaries like Giocaonline, which focuses on developing gaming software (skill games / casino games).
- Upstream, the value chain mainly consists of suppliers of betting odds and games (skill games, casino games, and virtual games), software application and computer hardware providers, computer server suppliers, authorisation and certification bodies for gaming products such as ADM, and marketing and communication companies. The physical point-of-sale network is also considered part of the upstream value chain due to its role in facilitating the opening and recharging of online gaming accounts. Service providers include utility companies (internet, telephony, electricity, etc.), waste management firms, and consultancy firms.
- Downstream, the customer is primarily the player, who is also the end user of the Group's online products. For mapping purposes, customers also include companies that purchase B2B products developed by the subsidiary Giocaonline, such as other remote gaming concessionaires.



Sports Franchise

The Group leads the **physical network betting and gaming sector** with four brands, which boast strong roots throughout the country: Better, Goldbet, Intralot and Planetwin365. Thanks to its network of thousands of outlets dedicated to sports betting, horse racing, and other gaming products, such as virtual games, as well as the professionalism of thousands of specialised operators, Lottomatica has become the leading betting operator in Italy. The betting network's points of sale are divided into shops and corners: the shops are environments dedicated to sports and betting, while the corners are more confined areas set up within other commercial establishments, like bars or tobacconists.

Upstream			Own operations	Downstream
Tier 3	Tier 2	Tier 1	Betting and physical network gaming	Customers
- Suppliers of raw materials (for energy production and manufactured goods) - Manufacturers of hardware components	- Software development companies - Hardware manufacturers - Computer servers - Certification and authorisation bodies (e.g. ADM) - Materials (furniture, marketing, Ho.Re.Ca.)	- Odds makers - Game software suppliers (virtual games) - Suppliers of other software (management software, applications) - Hardware suppliers (e.g. totems, gaming hall terminals) - Computer servers - Gaming hall furnishings and accessories - Ho.Re.Ca. suppliers - Marketing and communication - Certification and authorisation bodies - Point-of-sale operators	- Sports betting - Virtual games	Primary customers - Player End-users - Player
Provision of services (utilities, waste management, logistics, consultancy)				
- Utilities - Waste management - Logistics - Consultancy (IT, legal, communication, etc.)				

- Operations primarily involve offering sports betting and virtual games through the Group's network of sales outlets.
- Upstream, the value chain mainly includes suppliers of betting odds and virtual games, software application and computer hardware suppliers for the gaming halls, computer server suppliers, providers of gaming hall furnishings and accessories, and authorisation / certification bodies, such as the ADM. In line with the financial balance sheet, merchants operating betting shops and venues hosting corners are considered upstream in the value chain, as they provide the physical spaces for the Group's gaming products. Service providers include utility companies (internet, telephony, electricity, etc.), waste management companies, logistics firms responsible for transporting equipment to sales points, and consultancy firms.
- Downstream, the customer is primarily the player, who is also the end user of the Group's products.

Gaming Franchise

Thanks to top quality infrastructures and technologies designed to ensure maximum player protection, Lottomatica installs and monitors **amusement and entertainment machines** within public establishments and dedicated gaming halls throughout Italy. The Group is also engaged in the **direct management of gaming machines** (Street Operations) and **gaming halls** (Retail). Located throughout Italy, the gaming halls managed by Lottomatica have distinctive and recognisable brands, and have come to represent a benchmark for their high levels of service and customer attention, as well as for the quality and security of their products and services.

Upstream			Own operations	Downstream
Tier 3	Tier 2	Tier 1	AWP/VLT machines and direct management of gaming halls and owned AWP	Customers
- Suppliers of raw materials (for energy production and manufactured goods) - Manufacturers of hardware components	- Software development companies - Hardware manufacturers - Computer servers - Certification and authorisation bodies (e.g. ADM) - Materials (furniture, marketing, Ho.Re.Ca.) - Suppliers of raw materials	- AWP game card suppliers - VLT gaming platform suppliers - Gaming hardware suppliers (including AWP and VLT cabinets, spare parts, cash desks, and coin changers) - Software suppliers (management software, applications) - Computer servers - Gaming hall furnishings and accessories - Ho.Re.Ca. suppliers - Marketing and communication - Certification and authorisation bodies - Point-of-sale operators (VLT and betting halls, bars / tobacconists) - AWP operators - TIR and QIR - Hardware component suppliers - Suppliers of semi-finished products	Primary customers - AWP and VLT telematics network management - Direct AWP management - Direct operation of gaming halls - Bingo Secondary customers - Production of gaming cards and AWP machines	Primary customers - Player Secondary customers - Concessionaires - AWP operators End-users - Player
Provision of services (utilities, waste management, logistics, consultancy)				
- Utilities - Waste management - Logistics - Consultancy (IT, legal, communication, etc.)				

- Operations primarily involve managing the telematics network required for the functioning of AWP and VLT machines, as well as the direct management of AWP machines and gaming halls. The operation of several Group-owned bingo halls is also included within this segment. For mapping purposes, B2B activities conducted within this segment by subsidiaries such as Marim are also considered. These activities mainly involve the direct production of gaming cards and AWP machines.
- Upstream, the value chain primarily consists of suppliers of AWP cards, VLT gaming platforms, and gaming hardware such as AWP and VLT cabinets, cash desks, and coin changers. It also includes suppliers of computer software and servers, gaming hall furnishings and accessories, Ho.Re.Ca. suppliers for catering services offered at some locations, and licensing and



certification bodies, such as the ADM. In line with the financial balance sheet, merchants operating the points of sale (including VLT rooms, betting shops, and bars or tobacconists where AWP machines are installed) are considered upstream in the value chain as they provide the physical spaces for the Group's gaming products. Upstream suppliers also include rental and management companies for AWP machines, as well as Third and Fourth Party Collection Agents (TIRs and QIRs), who are responsible for the periodic collection of the amounts played on the machines. For mapping purposes, several supplier categories essential to the B2B business of manufacturing AWP boards and gaming machines are also included, such as hardware component suppliers for gaming boards and suppliers of semi-finished products for cabinet manufacturing. Service providers include utilities (internet, telephony, electricity, etc.), waste management, and logistics companies, which are necessary for handling gaming machines and other point-of-sale equipment, as well as consulting firms.

- Downstream, the customer is primarily the player, who is also the end user of the Group's products. For mapping purposes, customers also include companies that purchase B2B products (such as cards and AWP machines), including other concessionaires and AWP machine management companies.

Operating under the stringent supervision of the Customs and Monopolies Agency and through the digital connection with SOGEI that tracks all gaming activities, online and offline enables the Group to ensure that all of its business activities **fully comply with the Italian regulations** and the **highest standards of legal compliance**, thus promoting a **responsible and safe gaming environment** for all customers.

Lottomatica's primary objective is to generate sustainable value and positive impacts for the community, the environment, and all stakeholders. Consequently, the Group has **progressively integrated sustainability** into a well-defined strategy.

In this regard, the Group's **Sustainability Plan** is based on **three strategic pillars**: Responsibility, People and Community, and the Environment. These pillars guide the company's sustainability commitments, programmes, and objectives, each supported by a series of actions and initiatives across its various operating sectors.

Disclosure
requirement
SBM-2

Interests and views of 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 range 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.

The Group has identified both its internal and external stakeholders, breaking them down into six main-categories, primarily based in Italy.

LOTTOMATICA'S STAKEHOLDERS

EMPLOYEES AND COLLABORATORS

of offices, points of sale,
and other workplaces

SHAREHOLDERS AND THE FINANCIAL COMMUNITY

including: credit institutions, investment funds,
shareholders, bondholders, potential investors,
and other financial entities

SECTOR OPERATORS AND SUPPLIERS

including: commercial partners, hardware and software
technology suppliers, logistics companies, service
providers, certification bodies, network operators,
consulting companies

CUSTOMERS

of the online and physical sales networks

REGULATORY BODIES AND PUBLIC
ADMINISTRATIONS

including: the Customs and Monopolies Agency, the Mini-
stry of Economy and Finance, Ministry of Health, Ministry
of Environment, Central and Local Administrations

COMMUNITIES

including: local communities, universities, scientific
research institutes, cultural and sports associations
and organisations, consumer associations, and the
media



Maintaining ongoing dialogue with stakeholders is essential for the Group, as their interests guide its day-to-day operations and shape the corporate strategy. Therefore, in order to foster lasting and trusting relationships, Lottomatica employs a **range of** informal and formal **channels** and **methods**, tailoring its approach to suit the specific stakeholder group.

Category	Mode of engagement	Purpose
Employees and collaborators	Internal communication tools; events; regular meetings; meeting with workers' representatives; first-and second-level bargaining; satisfaction surveys	Enhancing the staff's sense of belonging; promoting inclusion; recognising and rewarding talent
Shareholders and the financial community	Shareholders' Meeting; Corporate Governance Report; Financial reports; Corporate website; Press releases	Communicating the creation of shared value; reinforcing trust; ensuring integrity and transparency
Sector operators and other suppliers	Specific meetings; Communication portals	Incorporating ESG-related aspects into the supply chain
Customers	Satisfaction surveys	Building customer loyalty; improving service quality
Regulatory bodies and Public Administrations	Specific meetings; regular communications; events	Fostering proactive and collaborative dialogue
Communities	Community projects; partnerships; press releases; engagement with local institutions	Promoting social inclusion

The results of stakeholder engagement activities are integrated into the Group's **strategic decision-making process and business model**. In particular, the identification of stakeholders' interests and opinions through materiality analysis allows the Group to determine Lottomatica's most significant impacts and, consequently, the relevant sustainability issues, thereby influencing its strategy and business model. This process is further detailed in the IRO-I Disclosure Requirement.

The Board of Directors is regularly informed of the stakeholders' interests, at least annually during the review of the dual materiality process. This ensures the timely alignment of interests and the continuous development of Lottomatica's strategy and business operations.

Disclosure
requirement
SBM-3

Material impacts, risks and opportunities and their interaction with the strategy and business model

The **material IROs for Lottomatica**¹⁶ were determined and assessed based on the specific characteristics of the sector in which the Group operates and the key players identified within the value chain.

ESRS (SUB-TOPIC)	IRO	DESCRIPTION	POSITIVE / NEGATIVE ACTUAL / POTENTIAL	TIME HORIZON	VALUE CHAIN
ESRS E1 – CLIMATE CHANGE					
Climate change mitigation	I	Greenhouse gas emissions at all stages of Lottomatica Group's production chain	Negative Actual	Short term Medium term Long term	Own Operations Upstream Downstream
Energy	I	Energy consumption from renewable sources at all stages of the production chain	Positive Actual	Short term Medium term Long term	Own Operations Upstream Downstream
ESRS E5 – CIRCULAR ECONOMY					
Waste	I	Generation of waste that requires disposal (incineration/landfill) rather than recycling	Negative Actual	Short term Medium term Long term	Own Operations Upstream Downstream
ESRS S1 – OWN WORKFORCE					
Working conditions	I	Employment stability and work-life balance	Positive Actual	Short term Medium term Long term	Own operations
	I	Violations of rights and regulations concerning working conditions	Negative Potential	Medium term Long term	Own operations
	O	Flexible and hybrid work models can enhance employees' work-life balance while simultaneously reducing personnel costs		Short term Medium term Long term	Own operations
	I	Raising employee awareness of occupational health and safety issues	Positive Actual	Short term Medium term Long term	Own operations
	I	Workplace accidents	Negative Actual	Short term Medium term Long term	Own operations
	R	Inadequate/partial compliance with the occupational health and safety regulations		Short term Medium term	Own operations
Equal treatment and opportunities for all	I	Incidents of discrimination and gender pay disparity	Negative Actual	Short term Medium term Long term	Own operations
	I	Employee attraction, development, and training	Positive Actual	Short term Medium term Long term	Own operations
	O	Investment in training and skill development programmes, including funded training and e-learning, can help attract and retain a highly qualified and diverse workforce while managing associated costs effectively		Short term Medium term Long term	Own operations
Other work-related rights	I	Human rights violations	Negative Potential	Medium term Long term	Own operations
	I	Cyber attacks and/or theft of information	Negative Potential	Medium term Long term	Own operations

16) With specific reference to impacts, the Group revised the analysis performed in the previous materiality analysis process, refining the methodology on the basis of the evidence emerging from the external context and the sustainability issues identified by the ESRS. With regard to risks and opportunities, instead, it is specified that they were identified and addressed for the first time in the dual materiality analysis carried out in 2024.



ESRS (SUB-TOPIC)	IRO	DESCRIPTION	POSITIVE / NEGATIVE ACTUAL / POTENTIAL	TIME HORIZON	VALUE CHAIN
ESRS S1 – OWN WORKFORCE					
Other work-related rights	R	Incorrect/lack of management of logical access constraints		Short term Medium term	Own operations
	R	Untimely, incomplete and/or incorrect implementation of the established security policies and specifications		Short term	Own operations
	R	Failure to identify actions to prevent cyber attacks or theft of information and data		Short term Medium term	Own operations
	R	Inadequate establishment, implementation, review, maintenance or improvement of the Information Security Management System (ISMS) within the context of the implementation and management of information systems and services related to the legally required retention activities		Short term Medium term	Own operations
	R	Inadequate data management, in terms of: confidentiality, integrity and availability		Short term Medium term	Own operations
ESRS S2 – WORKERS IN THE VALUE CHAIN					
Working conditions	I	Heightened awareness of occupational health and safety issues among workers in the value chain	Positive Potential	Medium term Long term	Upstream Downstream
	I	Accidents at the workplace of suppliers, logistics sites, and points of sale	Negative Actual	Short term Medium term Long term	Upstream Downstream
Equal treatment and opportunities for all	I	Expansion and updating of the skills of the workers in the production chain	Positive Potential	Medium term Long term	Upstream Downstream
Other work-related rights	I	Human rights violations along the value chain	Negative Potential	Medium term Long term	Upstream Downstream
	I	Cyber attacks and/or information theft along the value chain	Negative Potential	Medium term Long term	Upstream Downstream
ESRS S4 – CONSUMERS AND END USERS					
Information related impacts for consumers and/or end-users	I	Cyber attacks and/or theft of consumer information	Negative Potential	Medium term Long term	Downstream
	R	Incorrect/lack of management of logical access constraints		Short term Medium term	Own operations
	R	Untimely, incomplete and/or incorrect implementation of the established security policies and specifications		Short term	Own operations
	R	Failure to identify actions to prevent cyber attacks or theft of information and data		Short term Medium term	Own operations
	R	Inadequate establishment, implementation, review, maintenance or improvement of the Information Security Management System (ISMS) within the context of the implementation and management of information systems and services related to the legally required retention activities		Short term Medium term	Own operations
	R	Inadequate data management, in terms of: confidentiality, integrity and availability		Short term Medium term	Own operations
	I	Presence of cases of gambling disorder in the areas where the Group operates	Negative Actual	Short term Medium term Long term	Downstream

ESRS (SUB-TOPIC)	IRO	DESCRIPTION	POSITIVE / NEGATIVE ACTUAL / POTENTIAL	TIME HORIZON	VALUE CHAIN
ESRS S4 – CONSUMERS AND END USERS					
Social inclusion of consumers and/or end-users	R	Lack of ability to ensure the reliability and availability of ICT systems and critical computer programmes, with negative effects on operations in terms of malfunctions / disruptions / delays in IT systems, which in turn could affect the performance of the different businesses		Short term Medium term	Own operations
	R	Lack of Software Factory flows and processes, useful for aligning business objectives with the evolution of IT systems		Short term Medium term	Own operations
	R	Inadequate management of installation, replacement, maintenance, and decommissioning activities related to the technological infrastructures present at the network's points of sale (e.g. PoS, Gaming Machines, Terminals)		Short term Medium term	Own operations
	I	Adoption of responsible business and consumer protection practices	Positive Actual	Short term Medium term Long term	Downstream
	O	The provision of a secure gaming environment and legal channels can help attract some of the gaming demand that would otherwise turn to illegal gaming, resulting in improvements in the Group's financial performance		Short term Medium term Long term	Own operations Downstream
ESRS G1 – BUSINESS CONDUCT					
Business culture	I	Incidents of behaviour inconsistent with the Lottomatica Code of Ethics and mission	Negative Potential	Medium term Long term	Upstream Own operations
Whistleblower protection	I	Incidents of behaviour inconsistent with the Lottomatica Code of Ethics and mission	Negative Potential	Medium term Long term	Upstream Own operations
	R	Non-compliance or partial compliance with the Market Abuse Regulation on inside information		Short term	Own operations
Political engagement and lobbying	I	Transparency in interactions with institutions and trade associations	Positive Actual	Short term Medium term Long term	Own operations
Management of supplier relations, including payment practices	I	Adherence to Lottomatica's values and principles throughout the supply chain (e.g. Supplier Code of Conduct, Code of Ethics, 231 Model)	Positive Actual	Short term Medium term Long term	Upstream
	R	Procurement process not aligned with the business needs due to an unstructured accounts payable management cycle and/or uncoordinated information flows between the Purchasing & Shared Services function and other functions involved in the unstructured process		Short term	Upstream Own operations
	R	Identification of unqualified or unsuitable suppliers		Short term	Upstream Own operations
	R	Inadequacies in the supplier contracting process		Short term	Own operations
	I	Raising sustainability awareness within the supply chain	Positive Actual	Short term Medium term Long term	Upstream



ESRS (SUB-TOPIC)	IRO	DESCRIPTION	POSITIVE / NEGATIVE ACTUAL / POTENTIAL	TIME HORIZON	VALUE CHAIN
ESRS G1 – BUSINESS CONDUCT					
Bribery and corruption risks	I	Compliance with tax obligations and the payment/collection of taxes due to the Tax Authorities	Positive Actual	Short term Medium term Long term	Own operations
	R	Non-compliance or partial compliance with the regulations on related party transactions		Short term Medium term	Own operations
	R	Inadequate or non-implementation of anti-money laundering controls (231/07)		Short term Medium term	Own operations
	R	Inadequate or non-application of anomaly indicators during monitoring, as defined by the legislation, the FIU indications, and the ADM Guidelines		Short term Medium term	Own operations
	R	Potential economic damage caused by intentional dishonest or deceptive activities committed by individuals within the Company		Short term	Own operations
	R	Potential economic damage caused by intentional dishonest or deceptive activities committed by individuals outside the Company		Short term Medium term	Upstream

With regard to the risks and opportunities relevant to the Group, no significant current financial effects were identified with respect to the thresholds defined in the Group's ERM. It is specified that, as required by the ESRS and the Guideline on the Implementation of double materiality, inherent risks have been considered, assessed independently of the control measures/tools adopted to reduce their effects and/or reduce their probability of occurrence.

1.4 Impact, risk, and opportunity management

Disclosure
requirement
IRO-1

Description of the processes to identify and assess material impacts, risks and opportunities

In 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. The process update did not include any major assumptions. Specifically, the process involved the following steps:



1. Identification of potentially material topics

An in-depth analysis of sustainability-related topics, sub-topics, and sub-sub-topics covered in ESRS 1 (Application requirement 16 - *Sustainability issues to be included in the materiality assessment*) was conducted. The Group then reviewed the material topics identified during the previous materiality analyses and the external context, including regulatory changes, industry trends, and peer benchmarks. Following this review and their association with ESRS topics, an initial list of potentially material topics for the Group was established.

2. Identification of potentially material IROs

Starting with the prior year's materiality analysis and an examination of the external context, including regulatory studies and industry benchmarks, the impacts of the Group's activities and value chain on people and the environment were identified. These impacts were categorised as actual or potential, positive or negative, and associated with the sub-topics and sub-sub-topics defined by the standard. To ensure comprehensive analysis and a detailed view of the effects generated by various actors in the value chain, the impacts were further disaggregated among different stages of the value chain (own operations, upstream actors, and downstream actors).

With regard to the risks, the identification method followed the Group's ERM process. In particular, the sustainability risks present in the Group's risk library and the corresponding Key Risk Indicators (KRIs) were selected. In line with the ERM methodology, most of the risks were associated with the Group's own operations, while some specific risks were linked to upstream (Tier I and service providers) and downstream stages of the value chain. The opportunities, on the other hand, were identified by the Corporate Sustainability Function in collaboration with the Compliance 231 & Risk Management Function and opportunity owners. This was achieved through a benchmark analysis and by examining the positive impacts, also determining relevant quantitative metrics and the stages of the value chain they might affect. As with the impacts, the risks, and opportunities were



also aligned with the sub-topics and sub-sub-topics established by ESRS 1. A list of potentially material IROs was then created and evaluated using appropriate scoring mechanisms. Finally, in line with the double materiality implementation guideline, a correlation between the IROs was conducted to identify potential links and ensure the accuracy of the process, as risks and opportunities can arise from the impacts generated.

3. Establishment of the scoring and threshold mechanism

To ensure consistency and comparability between the two perspectives, Lottomatica Group has aligned its impact and financial materiality assessment system with the ERM methodology. In particular, for impact materiality, the scoring mechanism used in the 2023 materiality process was revised to reflect an updated analysis based on severity (for negative impacts) or benefit (for positive impacts) and likelihood, as required by the CSRD and relative ESRS standards. The severity of negative impacts is evaluated using the criteria of magnitude, extent, and irreversible nature, while the benefit of positive impacts is assessed using the criteria of magnitude and extent.

With regard to financial relevance, the scoring mechanism for risks and opportunities followed the ERM methodology, based on the potential magnitude of the financial effects (determined through four impact drivers) and the probability of occurrence.

Starting with the ERM, a consistent materiality threshold was subsequently established for both perspectives. Specifically, a threshold was established beyond which material IROs could be identified, following appropriate evaluations.

4. Stakeholder engagement and identification of material IROs

Before evaluating the positive and negative impacts, the Group conducted an analysis of the key stakeholder categories to be involved, which led to the identification of the following groups:

- *Affected*: employees, suppliers (including providers of hardware and software technology, logistics, maintenance, Ho.Re.Ca., utilities, consulting, and certifiers), operators, merchants, and physical network and online gaming customers.
- *Users*: financial community (including shareholders, credit institutions, bondholders, rating agencies, Consob, and the Italian stock exchange); regulatory bodies and public administrations (including MEF, ADM, Sogei, law enforcement agencies, local administrations, and the Ministry of Health); educational and scientific research institutions; consumer associations; and the media.

Of the stakeholders identified, the following macro-categories were directly involved in assessing the impacts linked to the Group's activities and its value chain:

- employees (including frontline staff, committees, and functions most directly overseeing ESG issues);
- suppliers (including providers of hardware and software technology solutions, logistics companies, maintenance services, and Ho.Re.Ca. and utility suppliers);
- financial community (the major shareholder and key credit institutions);
- business partners and operators of gaming and betting outlets.

Lottomatica developed an interactive questionnaire on an online engagement platform, tailored specifically to each selected category. In particular, for each identified positive or negative impact, the stakeholders were asked to rate the evaluation criteria previously defined on a scale of 1 to 5:

- magnitude: the scale of the impact in terms of positive or negative effects;
- extent: the reach of the impact, measured by geography and/or the number of individuals affected;
- irreversibility: applicable only to negative impacts, indicating Lottomatica's capacity to repair the damage caused.

The probability of the impacts, on the other hand, was determined according to the ERM methodology, as follows:

- the actual impacts — those that occurred during the reporting period or earlier — were assigned a maximum probability, equal to 5;
- the potential impacts were evaluated by the Corporate Sustainability function based on the existing safeguards. For negative impacts, this involved considering the probability of the related risks mapped during the ERM process, while for positive impacts, the focus was on the probability of the relative opportunities.

Moreover, to further align the analysis with the ESRS requirements and the double materiality implementation guidelines, an additional score was assigned to the relevance of impacts with potential effects on human rights. Impacts related to human rights violations, including those concerning working conditions, were given additional weight to emphasise the importance that employees and the Group's entire value chain must attribute to respecting these rights. This approach also ensures the annual monitoring of Lottomatica's performance with respect to these topics.

With regard to risks, the inherent risk assessment is conducted jointly by the Risk, Ethics & Compliance Department and the risk owner, and is associated with the risk areas identified using the following drivers, on a scale of 1 to 5:

- the impact associated with the risk, which can be economic, operational / quality, compliance and image;
- the probability of the risk occurring over a predefined time horizon.

With regard to opportunities, the associated impacts and their likelihood of occurrence were evaluated jointly by the Corporate Sustainability Function and the Risk Management Function, also taking into account the views of opportunity owners, in accordance with the ERM methodology.



Finally, after analysing all the assessments, the IROs that has been assigned a medium/high level of materiality, calculated as the product of severity/benefit and probability for the impacts, and of magnitude and probability for risks and opportunities, were considered material. The results of the process were then shared with the committees and workers' representatives.

Conclusions

The double materiality process took into account potential dependencies on natural, human, and/or social resources that could influence the Group's ability to continue using or acquiring the resources necessary for its activities and/or maintaining key relationships under sustainable conditions (e.g. raw materials used by suppliers for AWP boards, energy resources, etc.). Lottomatica's dependencies on natural and social resources are considered within the context of the risk of "Lack of availability of factors (e.g. information and telecommunications technologies, physical infrastructure, workspaces and electrical energy, human resources) essential for ensuring the functioning of the various business processes". The entire impact analysis and assessment process was reviewed with the company's top leadership, including the senior management, and will be updated annually. The results of the analysis were presented to the ESG Management Committee (which consists of the heads of Finance, External Communications, HR, Corporate and Legal Affairs, and the ESG Office), which meets at least once a month and engages in regular discussions with the ESG Advisory Board.

With regard to the topic of ESRS E2 "*Pollution*", the double materiality analysis identified a single impact, which is potential and limited to upstream actors in the Group's value chain. This impact is linked to the emission of air pollutants during the production of the raw materials required for the hardware components. However, this impact was below the materiality threshold, and was therefore not included in this document. Furthermore, the impact is managed within the broader Green Procurement Policy. Lottomatica reserves the right to further investigate this issue in the future and disclose it should it become more significant in terms of impacts, risks, and/or opportunities.

With regard to the topic of ESRS E3 "*Water and marine resources*", being primarily a service provider, Lottomatica only registers water consumption for civil use at its offices and gaming rooms, without any significant impacts on water sources. Nevertheless, the Group is committed to ensuring efficient water management by implementing practical measures to reduce water consumption and to prevent waste by promoting its responsible use.

With respect to the topic of ESRS E4 "*Biodiversity and ecosystems*", the analysis concluded that biodiversity is largely irrelevant given the nature of Lottomatica Group's operations and the sector in which it operates.

The double relevance analysis ultimately determined that the topic of ESRS S3 "*Affected communities*" is largely irrelevant, given the nature, activities, and sector in which Lottomatica Group operates. This conclusion is also based on the definition of Affected Communities provided by Annex II of EU Commission Delegated Regulation 2023/2772: "People or group(s) living or working in the same area that have been or may be affected by a reporting undertaking's operations or through its upstream and downstream value chain. Affected communities can range from those living adjacent to the undertaking's operations (local communities) to those living at a distance. Affected communities include actually and potentially affected indigenous people."

Disclosure
requirement related
to ESRS 2 IRO-1

Description of the processes to identify and assess material impacts, risks and opportunities related to climate

Environmental protection is a **strategic priority** for the Group, aimed at creating sustainable value for its stakeholders over the short, medium, and long term. That's why Lottomatica Group is dedicated to pursuing **goals aimed at mitigating its impacts**, and to promoting virtuous conduct on the part of all its partners and suppliers. In 2022, Lottomatica adopted an **Emission Reduction Plan**, which established appropriate measures to decrease its energy consumption and CO₂ emissions. Alongside its reduction plan, additional in-depth work was carried out in 2023, focusing particularly on Scope 3 emissions, to support the development of a **Carbon Strategy** with **definitive quantitative targets** by 2024. In its climate change impact disclosure, namely regarding Lottomatica's GHG emissions (carbon footprint as outlined in section ESRS E1-6), the analysis reveals a greater climate impact from Scope 3 activities, mainly due to logistics and technology acquisition activities (capital goods required for operating the Lottomatica business). The process included a significance analysis to identify, assess, and calculate the GHG impacts generated by each Group company. Energy efficiency is pursued in any renovation work carried out at headquarters, in other offices or in the Group's sales points and gaming halls. This is the direction in which the energy efficiency measures introduced by the Group have been heading over the years.

Disclosure
requirement related
to ESRS 2 IRO-1

Description of the processes to identify and assess material impacts, risks and opportunities related to the use of resources and circular economy

For Lottomatica, the **responsible management of the waste** generated by its offices and gaming halls means reducing the waste produced, disposing of it 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**, which includes periodically updated procedures, oversight of outsourced operations, and ongoing employee communication and awareness programmes to encourage waste reduction. Lottomatica's impact is deemed material because the company not only evaluated the negative impact associated with its own activities but also, from a forward-looking perspective, its impact along the value chain, considering both suppliers and customers.

Disclosure
requirement related
to ESRS 2 IRO-1

Description of the processes to identify and assess material impacts, risks and opportunities

During the double materiality analysis, the Group carefully considered its own activities, its business model, and the broader context in which it operates. In particular, the Italian public gaming sector is shaped by a complex regulatory history that, over the past twenty years, has established and regulated the game requirements, the provision methods, the characteristics of the distribution network and sales venues, and the criteria for the distribution of collections and revenues among all parties involved in the chain (consumers, the State, concessionaires, operators), in **compliance** with **fundamental public interest** objectives upheld by the sector. Lottomatica has consistently **collaborated proactively** with public institutions, particularly with the Customs and Monopolies Agency, to ensure compliance with the regulatory frameworks and to support their adaptation to market changes and industry challenges.



1.5 Summary of Policies

The following is a list of **Policies and Codes** adopted by Lottomatica Group for each material topic identified, aimed at preventing, mitigating, and managing actual and potential impacts, addressing potential risks, and seizing opportunities. In formulating its policies, Lottomatica also considers its **stakeholders' interests**, with an approach that integrates continuous dialogue, risk monitoring, and feedback initiatives directed at the corporate population, even within the context of the certification maintenance process. These policies are **regularly reviewed** in light of specific relevant legislation and standards, audit results, and the monitoring of national and international trends.

Policy	Description of key elements	Scope of the Policy	Person responsible for implementation	Internationally recognised standards	Accessibility	ESRS Topic
Environmental Sustainability Policy	Compliance with the environmental laws and regulations Addresses responsible resource and waste management while also promoting paper conservation Commitment to: - reducing environmental impacts; - lowering emissions; - monitoring and optimising energy consumption; - sourcing and using renewable energy. Promotes environmental awareness among the company's staff and stakeholders	Employees, internal consultants, suppliers, business partners	BoD	17 UN Sustainable Development Goals The 2030 Agenda The 2015 Paris Agreement The COP26 Climate Conference Core Conventions of the International Labour Organisation, OECD Guidelines	Company Website; Training sessions	E1 / E5
Green Procurement Policy	Ensures the selection of suppliers that produce goods / provide services that have a lesser or reduced effect on the environment through reward mechanisms based on: - compliance with environmental criteria; - certification of environmental management systems (EMAS-ISO 14001); - possession of certified environmental management systems (EMAS-ISO 14001); - presence of decarbonisation plans.	Employees, internal consultants, suppliers, business partners	BoD	17 UN Sustainable Development Goals The 2030 Agenda The 2015 Paris Agreement The COP26 Climate Conference	Company Website; Training sessions	E1 / E5 / G1
Policy on the protection and preservation of Human Rights	Defines, structures and develops a clear approach to the protection and safeguarding of human rights that is broader than that required by law through general principles such as: - safeguarding and protecting the rights of employees, suppliers and partners, including non-discrimination; fair and favourable working conditions; occupational health and safety; freedom of association and right to collective bargaining; fight against child and forced labour, working time policy; - customer protection, including privacy and responsible gaming.	All parties belonging to the Group's value chain	CdA	The Universal Declaration of Human Rights and subsequent international conventions on civil and political rights and on economic, social and cultural rights The Declaration on Fundamental Principles and Rights in the Workplace and the eight Core Conventions of the International Labour Organisation (ILO) The 2030 Agenda and its SDGs	Training sessions, Company Website	S1 / S2 S4 / G1

Policy	Description of key elements	Scope of the Policy	Person responsible for implementation	Internationally recognised standards	Accessibility	ESRS Topic
Diversity Policy of the Board of Directors	Enhances diversity as a founding element of sustainability also with reference to the Company's Board of Directors, pursuing the objective of integrating different managerial and professional profiles in its composition, also maintaining a balanced presence of independent members and a balanced representation of gender and age	BoD	BoD	-	Company Website	S1
Smart working Policy	Facilitates work-life balance in return for greater accountability for results and an environmental benefit through reduced CO ₂ emissions	Group employees	Chief People Officer	-	Company Intranet	S1
Code of Ethics	Establishes the general principles to be upheld by the Recipients, including: • compliance with laws and regulations; • protection of personal integrity • impartiality in relations with stakeholders; • promotion of human rights; • assurance of working conditions that respect individual dignity. Promotes responsible gaming to protect players Recipients' responsibility to report any instances of non-compliance to the Supervisory Board appointed pursuant to Legislative Decree no. 231/01	Representatives of Shareholders, Board of Directors, Board of Auditors, employees, collaborators, and all of the Company's business or financial partners	BoD	Universal Declaration of the United Nations Core Conventions of the International Labour Organisation OECD Guidelines	Company Website	S1 / S2 / S4 / G1
Data protection Policy	Describes the internal processes to ensure the activities in question comply with the standards outlined by EU Regulation 679/2016 (GDPR) Includes key regulations, disclosures, and in-house privacy procedures that all recipients are required to follow	Personal data of customers, employees, suppliers, users, job applicants, investors, partners, and other third parties	Data protection officer	GDPR Regulation Provisions of the Data Protection Authority Privacy Code Civil Code	Company Website	S1 / S2 / S4 / G1
Diversity and Inclusion Policy	Reinforces the promotion of a pluralistic and inclusive culture, ensuring that all company resources have equal access to opportunities, regardless of personal, social, or cultural characteristics Specifically addresses various areas of diversity: • gender equity; • sexual orientation and gender identity; • intergenerational appreciation; • disability and accessibility; • promotion of an inter-cultural outlook.	Group Companies	BoD	The 2030 Agenda and SDGs Universal Declaration of Human Rights The Declaration on Fundamental Principles and Rights in the Workplace The Core Conventions of the International Labour Organisation ILO Convention on Violence and Harassment (June 2019)	Company Website; Company Intranet	S1

Policy	Description of key elements	Scope of the Policy	Person responsible for implementation	Internationally recognised standards	Accessibility	ESRS Topic
Gender Equality Policy	Reinforces protection and valorisation of gender differences and equal opportunities in the workplace, encouraging women's empowerment through activities and programmes aimed at fostering gender equity, the gender pay gap and spreading an inclusive and aware culture It promotes: • equal social rights for men and women; • equality of participation and representation; • career development policies aimed at closing the gender gap; • improved gender balance in organisational processes and work teams.	Group Companies	BoD	UNI/PdR 125:2022 National and International gender equality standards	Company Website; Company Intranet	S1
Supplier Code of Conduct	Encourages suppliers to align with the Group's policies, ensuring compliance with national regulations on tax fraud, corruption, and money laundering, while also supporting the objectives of the 2030 Agenda Enforces adherence to the applicable laws and international standards for environmental, social, and governance practices Mandates suppliers' compliance with principles of: • diversity and inclusion; • professional ethics and regulatory compliance; • compliance with anti-corruption regulations; • human rights and working conditions; • environmental regulations and protection; • health and safety; • proprietary and confidential information.	All Group suppliers and their parents, subsidiaries, affiliates, subcontractors and others in the supply chain	BoD	Agenda 2030 ILO Declaration Current Anti-Corruption Laws	Company Website; Niuma platform	S2
Responsible Marketing Policy	Establishes the standards for responsible marketing, providing the principles relating to the development and/or choice of products, their information and communication and their marketing, in compliance with current legislation and the company's commitment to promoting Responsible Gaming Ensures compliance with the regulations in force for the development and selection of products, their communication and marketing Promotes responsible gaming practices as essential for business sustainability Commits the Group to principles of legality, transparency, protection of minors, prevention of excessive gaming, promotion of a responsible gaming model, and respect for the community Establishes the guidelines for: • the development of the gaming products and services; • communications and information for players and potential users; • promotion of initiatives across physical and online channels.	Group companies and therefore all employees, collaborators, suppliers, with particular reference to business management and promotion activities and the relevant functions involved	BoD	Decree Law of 2012 No. 58 (Balduzzi Decree) Decree Law No. 87 of 12 July 2018 (Dignity Decree) Legislative Decree No. 41 of 23 March 2024 Decree Law No. 58 of 13 September 2012	Company Website; Company Intranet	S1 / S2 / S4

Policy	Description of key elements	Scope of the Policy	Person responsible for implementation	Internationally recognised standards	Accessibility	ESRS Topic
Responsible Gaming Policy	Main targets: • compliance with laws and regulations; • reduction of business-related impacts; • internal awareness, education and continuous training for all employees; • compliance with the Responsible Marketing Policy; • pathological gambling prevention tools within products and services and tools for monitoring player behaviour.	Group companies' employees, collaborators, and suppliers	BoD	G4 certification, developed by the Global Gambling Guidance Group WLA certification, developed by the Responsible Gaming Framework of the World Lottery Association	Training sessions; Company Website; Company Intranet	S1 / S2 / S4
Quality and Safety Policy	Establishes quality standards for all stakeholders, ensuring all their needs are met Integrates occupational health and safety principles across all company activities Safeguards worker health and implements effective measures to prevent occupational accidents, injuries, and diseases Ensures suppliers are selected also taking into account the occupational health and safety assurances they provide Manages and monitors an Integrated Quality and Safety Management System compliant with UNI EN ISO 9001 and UNI EN ISO 45001 standards	Group Companies	Managing Directors and the Employer	Applicable health and safety laws and regulations, Legislative Decree 81/2008	Company Website	S4
231 Model	Ensures the implementation of an Organisation, Management, and Control Model (Legislative Decree 231/2001) to guarantee transparency and integrity in business management Identifies any company activities potentially at risk under ex. Legislative Decree 231/01 Establishes an internal regulatory framework for the prevention of offences under ex. Legislative Decree 231/01 Promotes an organisational structure aimed at encouraging and monitoring the correctness of the conduct adopted Identifies the processes for the management and control of financial resources Provides adequate training and information to the employees regarding the Model itself	Representatives of shareholders, members of the Board of Directors, members of the Board of Auditors, employees, collaborators, and all entities with commercial or financial relationships with the Company	BoD	Legislative Decree 231/01 Guidelines issued by Confindustria	Company Website	G1

Policy	Description of key elements	Scope of the Policy	Person responsible for implementation	Internationally recognised standards	Accessibility	ESRS Topic
Whistleblowing procedure	Regulates the process of receiving, analysing, and managing reports of alleged wrongdoing or violations which have come to knowledge in the work context, i.e. conduct, acts or omissions that harm the public interest or the integrity of Lottomatica Group	Members of Corporate Bodies and third parties engaged in business relations	BoD	Legislative Decree 231/2991 Law 179/2017 Law 4 August 2022 Legislative Decree 24/2023 UNI ISO 37001:2016 UNI PdR 125:2022 Law 162/2021	Company Website	G1
Anti-Bribery and Corruption policy	Promotes the fight against corruption in all its forms and encourages a culture that deters corrupt activities while facilitating the prevention and detection of such conduct It continuously improves the sensitivity of those who work in various capacities with the Group in recognising corrupt phenomena, as well as their reactivity in taking an active part in preventing, countering and reporting possible violations of regulations	Group companies, corporate bodies, employees, collaborators, third parties in any way connected with the Group	BoD	Global Compact	Company Website; Training	G1
Anti-Money Laundering (AML) Policy	Provides a framework to help Group entities identify and manage money laundering and terrorist financing risks Regulates and monitors: - the management of fiscal and financial flows; - procurement; - relations with institutions and public bodies; - corporate affairs; - the organisation of events; - exhibitions; - sponsorship and advertising activities; - gifts, entertainment and hospitality expenses; - staff recruitment and management; - commercial and business activities; - management of disputes; - relations with the board of statutory auditors and the independent auditing firm.	Group Companies, employees and gaming service providers across both physical and online networks	BoD	Legislative Decree no. 231/2007	Company Website	G1

1.6 ESRS Index and additional EU Legislative Disclosures

Disclosure
requirement
IRO-2

ESRS disclosure requirements covered by the company's Consolidated sustainability statement

ESRS Content Index

Declaration of use	Lottomatica has submitted its Consolidated sustainability statement in accordance with the ESRS Standards for the fiscal year 2024	
Use of ESRS 1	ESRS 1 – General Requirements	
ESRS Standard	Indicator number and description	Page
General Information		
ESRS 2	Disclosure Requirement BP-1 – General basis for preparation of sustainability statement (reporting criteria) for preparation	54
	Disclosure Requirement BP-2 – Disclosures in relation to specific circumstances	54-55
	Disclosure Requirement GOV-1 – The role of the administrative, management and supervisory bodies	55-58
	G1 Disclosure requirement related to ESRS 2 GOV-1 – The role of the administrative, management and supervisory bodies	55-58
	Disclosure Requirement GOV 2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	58
	Disclosure Requirement GOV-3 – Integration of sustainability-related performance in incentive schemes	59
	E1. Disclosure requirement relative to ESRS 2 GOV-3 – Integration of sustainability-related performance in incentive schemes	59
	Disclosure Requirement GOV-4 – Statement on due diligence	60
	Disclosure Requirement GOV-5 – Risk management and internal controls over sustainability reporting	61-62
	Disclosure Requirement SBM-1 – Strategy, business model and value chain	63-69
	Disclosure Requirement SBM-2 – Interests and views of stakeholders	70-71
	Disclosure Requirement SBM-3 – Material impacts, risks and opportunities and their interaction with the strategy and business model	72-75
	Disclosure Requirement IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities	76-79
	E1. Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities related to climate	80
	E5. Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities related to the use of resources and circular economy	80
	G1. Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities	80
	Minimum disclosure requirement – Policies MDR-P – Policies adopted to manage material sustainability matters	81-85
	Disclosure Requirement IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement	86-88
Environmental Information		
EU Taxonomy Disclosure		97-108
E1 Climate change	Disclosure Requirement E1-1 – Transition plan for climate change mitigation	108-109
	Disclosure requirement related to ESRS 2 SBM – 3 Material impacts, risks and opportunities and their interaction with the strategy and business model	110
	Disclosure Requirement E1-2 – Policies related to climate change mitigation and adaptation	111
	Minimum disclosure requirement – Actions MDR-A – Actions and resources in relation to material sustainability matters	111-113
	Disclosure requirement E1-3 – Actions and resources in relation to climate change policies	111-113
	Minimum disclosure requirement – Targets MDR-T – Tracking effectiveness of policies and actions through targets	113-115
	Disclosure Requirement E1-4 – Targets related to climate change mitigation and adaptation	113-115
	Disclosure Requirement E1-5 – Energy consumption and mix	115
	Disclosure Requirement E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions	116-120
Disclosure Requirement E1-9 – Anticipated financial effects from material physical and transition risks and potential climate-related opportunities		120



ESRS Standard	Indicator number and description	Page
Environmental Information		
E5 Resource use and circular economy	Disclosure Requirement E5-1 – Policies implemented to manage resource use and circular economy	121
	Minimum disclosure requirement – Actions MDR-A – Actions and resources in relation to material sustainability matters	121-124
	Disclosure Requirement E5-2 – Actions and resources related to resource use and circular economy	121-124
	Disclosure Requirement E5-3 – Targets related to resource use and circular economy	125
	Minimum disclosure requirement – Targets MDR-T – Tracking effectiveness of policies and actions through targets	125
	Disclosure Requirement E5-5 – Resource outflows	125-126
Social Information		
S1 Own Workforce	Disclosure requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with the strategy and business model	131-132
	Disclosure Requirement S1-1 – Policies related to own workforce	132-137
	Disclosure Requirement S1-2 – Processes for engaging with own workers and workers' representatives about impacts	137-138
	Disclosure Requirement S1-3 – Processes to remediate material negative impacts and channels for own workers and workers to raise concerns	138-140
	Minimum disclosure requirement – Actions MDR-A – Actions and resources in relation to material sustainability matters	141-149
	Disclosure Requirement S1-4 – Taking action on material impacts on own workforce and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	141-149
	Minimum disclosure requirement – Targets MDR-T – Tracking effectiveness of policies and actions through targets	149
	Disclosure requirement S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	149
	Disclosure Requirement S1-6 – Characteristics of the undertaking's employees	150
	Disclosure Requirement S1-7 – Characteristics of non-employee workers in the undertaking's own workforce	150
	Disclosure Requirement S1-8 – Collective bargaining coverage and social dialogue	151
	Disclosure Requirement S1-9 – Diversity indicators	152
	Disclosure Requirement S1-10 – Fair remuneration	152-153
	Disclosure Requirement S1-11 – Social security	153
	Disclosure Requirement S1-12 – Persons with disabilities	153
	Disclosure Requirement S1-13 – Training and skills development indicators	153-154
	Disclosure Requirement S1-14 – Health and safety indicators	155
	Disclosure Requirement S1-15 – Work-life balance indicators	155
	Disclosure Requirement S1-16 – Remuneration indicators (pay gaps and total remuneration)	156
	Disclosure Requirement S1-17 – Incidents, complaints, and serious impacts related to human rights	156-157

ESRS Standard	Indicator number and description	Page
Social Information		
S2 Workers in the value chain	Disclosure requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with the strategy and business model	157
	Disclosure Requirement S2-1 – Policies related to value chain workers	158
	Disclosure Requirement S2-2 – Processes for engaging with value chain workers about impacts	158-159
	Disclosure Requirement S2-3 – Processes to remediate negative impacts and channels for value chain workers to raise concerns	159-160
	Minimum disclosure requirement – Actions MDR-A – Actions and resources in relation to material sustainability matters	160-161
	Disclosure Requirement S2-4 – Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action	160-161
	Minimum disclosure requirement – Targets MDR-T – Tracking effectiveness of policies and actions through targets	162
	Disclosure requirement S2-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	162
S4 Consumers and end-users	The ESRS 2 SBM-3 Disclosure Requirement – Material impacts, risks and opportunities and their interaction with the strategy and business model related to impacts, risks and opportunities	165-166
	Disclosure Requirement S4-1 – Policies related to consumers and end-users	166
	Disclosure Requirement S4-2 – Processes for engaging with consumers and end-users about impacts	167
	Disclosure Requirement S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	167-168
	Minimum disclosure requirement – Actions MDR-A – Actions and resources in relation to material sustainability matters	168-171
	Disclosure Requirement S4-4 – Taking action on material impacts on consumers and end-user, approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	168-171
	Minimum disclosure requirement – Targets MDR-T – Tracking effectiveness of policies and actions through targets	171
	Disclosure Requirement S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	171
Governance Information		
G1 Business conduct	Disclosure Requirement G1-1 – Corporate culture and business conduct policies	175
	Disclosure Requirement G1-2 – Management of relationships with suppliers	175
	Disclosure Requirement G1-3 – Prevention and detection of corruption or bribery	176
	Minimum disclosure requirement – Actions MDR-A – Actions and resources in relation to material sustainability matters	177
	Disclosure Requirement G1-4 – Incidents of corruption or bribery	178
	Disclosure Requirement G1-5 – Political influence and lobbying activities	178
	Disclosure Requirement G1-6 – Payment practices	179
	Minimum disclosure requirement – Targets MDR-T – Tracking effectiveness of policies and actions through targets	179



List of datapoints derived from other EU legislative acts

Disclosure requirements and related data	SFDR reference	Reference to Pillar 3	Reference to the Benchmark Regulation	Reference to the EU Climate Law	Material / Immaterial	Page
ESRS 2 GOV-1 Gender diversity of the Council, section 21(d)	Indicator No. 13 in Table 1 of Annex 1	N/A	Commission Delegated Regulation (EU) 2020/1816, Annex II	N/A	Material	56
ESRS 2 GOV-1 Percentage of board members who are independent, sec. 21(e)	N/A	N/A	Delegated Regulation (EU) 2020/1816, Annex II	N/A	Material	56
ESRS 2 GOV-4 Due diligence statement, section 30	Indicator No. 10 in Table 3 of Annex 1	N/A	N/A	N/A	Material	60
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities, paragraph 40(d) i	Indicator No. 4 in Table 1 of Annex 1	Article 449a of Regulation (EU) no. 575/2013: Implementing Regulation (EU) 2022/2453 Table 1: Qualitative information on environmental risk and Table 2: Qualitative information on social risk	Delegated Regulation (EU) 2020/1816, Annex II	N/A	Immaterial	-
ESRS 2 SBM-1 Involvement in Activities Related to the Production of Chemicals, sec. 40(d) ii	Indicator No. 9 in Table 2 of Annex 1	N/A	Delegated Regulation (EU) 2020/1816, Annex II	N/A	Immaterial	-
ESRS 2 SBM-1 Involvement in controversial weapons activities, sec. 40(d) iii	Indicator No. 14 in Table 1 of Annex 1	N/A	Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	N/A	Immaterial	-
ESRS 2 SBM-1 Involvement in activities relating to the cultivation and production of tobacco, sec. 40(d) iv	N/A	N/A	Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	N/A	Immaterial	-
ESRS E1-1 Transition Plan to Achieve Climate Neutrality by 2050, section 14	N/A	N/A	N/A	Regulation (EU) 2021/1119, Article 2(1)	Immaterial	-
ESRS E1-1 Companies excluded from Paris-aligned indices, section 16(g)	N/A	Article 449a of Regulation (EU) no. 575/2013; Implementing Regulation (EU) 2022/2453 Model 1: Climate change transition risk in the banking book: Credit quality of exposures by sector, issuance and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1(d) through (g), and Article 12.2	N/A	Immaterial	-
ESRS E1-4 Greenhouse gas emission reduction targets, sec. 34	Indicator No. 4 in Table 2 of Annex 1	Article 449a of Regulation (EU) no. 575/2013; Implementing Regulation (EU) 2022/2453 Model 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6	N/A	Material	113



Disclosure requirements and related data	SFDR reference	Reference to Pillar 3	Reference to the Benchmark Regulation	Reference to the EU Climate Law	Material / Immaterial	Page
ESRS E1-5 Energy consumption from fossil fuels, disaggregated by source (high climate impact sectors only), section 38	Indicator No. 5 in Table 1 of Annex 1 and Indicator No. 5 in Table 2 of Annex 1	N/A	N/A	N/A	Immaterial	-
ESRS E1-5 Energy consumption and mix, section 37	Indicator No. 5 in Table 1 of Annex 1	N/A	N/A	N/A	Material	115
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors, sections 40 to 43	Indicator No. 6 in Table 1 of Annex 1	N/A	N/A	N/A	Immaterial	-
ESRS E1-6 Gross Scope 1, 2, 3 and total GHG emissions, sec. 44	Indicator No. 1 and 2 in Table 1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Implementing Regulation (EU) 2022/2453 Model 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, issuance and residual maturity	Delegated Regulation (EU) 2020/1818, Articles 5(1), 6 and 8(1)	N/A	Material	116
ESRS E1-6 Intensity of gross GHG emissions, sections 53 to 55	Indicator No. 3 in Table 1 of Annex 1	Article 449a of Regulation (EU) no. 575/2013; Implementing Regulation (EU) 2022/2453 Model 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)	N/A	Material	116
ESRS E1-7 GHG removals and carbon credits, section 56	N/A	N/A	N/A	Regulation (EU) 2021/1119, Article 2(1)	Immaterial	-
ESRS E1-9 Exposure of the benchmark index portfolio to physical climate-related risks, section 66	N/A	N/A	Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II	N/A	Immaterial	-
ESRS E1-9 Breakdown of monetary amounts by acute and chronic physical risk, section 66(a) ESRS E1-9 Location of assets at significant physical risk, section 66(c)	N/A	Article 449a of Regulation (EU) no. 575/2013; Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Model 5: Banking book – Physical risk related to climate change: Exposures subject to physical risk	N/A		Immaterial	-
ESRS E1-9 Breakdown of the book value of its real estate assets by energy efficiency classes, section 67(c)	N/A	Article 449a of Regulation (EU) no. 575/2013; Implementing Regulation (EU) 2022/2453 paragraph 34; Model 2: Banking book – Climate change transition risk: Loans backed by real estate – Collateral efficiency	N/A	N/A	Immaterial	-

Disclosure requirements and related data	SFDR reference	Reference to Pillar 3	Reference to the Benchmark Regulation	Reference to the EU Climate Law	Material / Immaterial	Page
ESRS E1-9 Degree of portfolio exposure to climate-related opportunities, section 69	N/A	N/A	Delegated Regulation (EU) 2020/1818	N/A	Immaterial	-
ESRS E2-4 Amount of each pollutant listed in Annex II of E-PRTR (European Pollutant Release and Transfer Register) emitted to air, water and land, section 28	Indicator No. 8 in Table 1 of Annex 1 Indicator No. 2 in Table 2 of Annex 1 Indicator No. 1 in Table 2 of Annex 1 Indicator No. 3 in Table 2 of Annex 1	N/A	N/A	N/A	Immaterial	-
ESRS E3-1 Waters and marine resources, section 9	Indicator No. 7 in Table 2 of Annex 1	N/A	N/A	N/A	Immaterial	-
ESRS E3-1 Dedicated policy, section 13	Indicator No. 8 in Table 2 of Annex 1	N/A	N/A	N/A	Immaterial	-
ESRS E3-1 Sustainability of the oceans and seas, section 14	Indicator No. 12 in Table 2 of Annex 1	N/A	N/A	N/A	Immaterial	-
ESRS E3-4 Total recycled and reused water, section 28(c)	Indicator No. 6.2 in Table 2 of Annex 1	N/A	N/A	N/A	Immaterial	-
ESRS E3-4 Total water consumption in m3 compared to net revenues from own operations, section 29	Indicator No. 6.1 in Table 2 of Annex 1	N/A	N/A	N/A	Immaterial	-
ESRS 2 IRO-1 - E4 section 16(a)(i)	Indicator No. 7 in Table 1 of Annex 1	N/A	N/A	N/A	Immaterial	-
ESRS 2 IRO-1 - E4 section 16 (b)	Indicator No. 10 in Table 2 of Annex 1	N/A	N/A	N/A	Immaterial	-
ESRS 2 IRO-1 - E4 section 16(c)	Indicator No. 14 in Table 2 of Annex 1	N/A	N/A	N/A	Immaterial	-
ESRS E4-2 Sustainable agricultural/land-use policies or practices, section 24(b)	Indicator No. 11 in Table 2 of Annex 1	N/A	N/A	N/A	Immaterial	-
ESRS E4-2 Sustainable sea/ocean use practices or policies, section 24(c)	Indicator No. 12 in Table 2 of Annex 1	N/A	N/A	N/A	Immaterial	-
ESRS E4-2 Policies to address deforestation, section 24(d)	Indicator No. 15 in Table 2 of Annex 1	N/A	N/A	N/A	Immaterial	-
ESRS E5-5 Non-recycled waste, section 37(d)	Indicator No. 13 in Table 2 of Annex 1	N/A	N/A	N/A	Material	126
ESRS E5-5 Hazardous waste and radioactive waste, section 39	Indicator No. 9 in Table 1 of Annex 1	N/A	N/A	N/A	Material	125



Disclosure requirements and related data	SFDR reference	Reference to Pillar 3	Reference to the Benchmark Regulation	Reference to the EU Climate Law	Material / Immaterial	Page
ESRS 2 - SBM3 -S1 Risk of forced labour, section 14(f)	Indicator No. 13 in Table 3 of Annex I	N/A	N/A	N/A	Immaterial	-
ESRS 2 - SBM3 -S1 Risk of child labour, section 14(g)	Indicator No. 12 in Table 3 of Annex I	N/A	N/A	N/A	Immaterial	-
ESRS S1-1 Political commitments to human rights, section 20	Indicator No. 9 in Table 3 of Annex I	N/A	N/A	N/A	Material	132
ESRS S1-1 Due diligence policies on matters covered by Core Conventions 1 to 8 of the International Labour Organisation, section 21	N/A	N/A	Delegated Regulation (EU) 2020/1816, Annex II	N/A	Material	132
ESRS S1-1 Procedures and measures to prevent trafficking in human beings, section 22	Indicator No. 11 in Table 3 of Annex I	N/A	N/A	N/A	Material	132
ESRS S1-1 Occupational accident prevention policy or management system, section 23	Indicator No. 1 in Table 3 of Annex I	N/A	N/A	N/A	Material	132
ESRS S1-3 Mechanisms for handling claims/complaints, section 32(c)	Indicator No. 5 in Table 3 of Annex I	N/A	N/A	N/A	Material	138-140
ESRS S1-14 Number of deaths and number and rate of work-related injuries, sec. 88 (b) and (c)	Indicator No. 2 in Table 3 of Annex I	N/A	Delegated Regulation (EU) 2020/1816, Annex II	N/A	Material	155
ESRS S1-14 Number of days lost due to injury, accident, fatality or illness, sec. 88 (e)	Indicator No. 3 in Table 3 of Annex I	N/A	N/A	N/A	Material	155
ESRS S1-16 Unadjusted gender pay gap, section 97(a)	Indicator No. 12 in Table 1 of Annex I	N/A	Delegated Regulation (EU) 2020/1816, Annex II	N/A	Material	156
ESRS S1-16 Excessive pay gap in favour of the CEO, section 97(b)	Indicator No. 8 in Table 3 of Annex I	N/A	N/A	N/A	Material	156
ESRS S1-17 Discrimination-related incidents, section 103(a)	Indicator No. 7 in Table 3 of Annex I	N/A	N/A	N/A	Material	156
ESR S1-17 Failure to comply with the UN Guiding Principles on Business and Human Rights and OECD section 104(a)	Indicator No. 10 in Table 1 and indicator No. 14 in Table 3 of Annex I	N/A	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Article 12 (1)	N/A	Material	156
ESRS 2 SBM-3 - S2 Serious risk of child labour or forced labour in the labour chain, section 11(b)	Indicator No. 12 in Table 13 of Annex I	N/A	N/A	N/A	Material	157

Disclosure requirements and related data	SFDR reference	Reference to Pillar 3	Reference to the Benchmark Regulation	Reference to the EU Climate Law	Material / Immaterial	Page
ESRS S2-1 Political commitments to human rights, section 17	Indicator No. 9 in Table 3 and indicator no. 1, Table 1 of Annex 1	N/A	N/A	N/A	Material	158
ESRS S2-1 Policies related to value chain workers, section 18	Indicator No. 11 and 4 in Table 3 of Annex 1	N/A	N/A	N/A	Material	158
ESRS S2-1 Non-compliance with the UN Guiding Principles on business and human rights and the OECD Guidelines, section 19	Indicator No.10 in Table 1 of Annex 1	N/A	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Article 12 (1)	N/A	Material	158
ESRS S2-1 Due diligence policies on matters covered by Core Conventions 1 to 8 of the International Labour Organisation, section 19	N/A	N/A	Delegated Regulation (EU) 2020/1816, Annex II	N/A	Material	158
ESRS S2-4 Human rights issues and incidents in the upstream and downstream value chain, section 36	Indicator No. 14 in Table 3 of Annex 1	N/A	N/A	N/A	Immaterial	-
ESRS S3-1 Political commitments to human rights, section 16	Indicator No. 9 in Table 3 and indicator 11 Table 1 of Annex 1	N/A	N/A	N/A	Immaterial	-
ESRS S3-1 Failure to comply with the UN guiding principles on business and human rights, the ILO principles or the OECD guidelines, section 17	Indicator No. 10 in Table 1 of Annex 1	N/A	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Article 12 (1)	N/A	Immaterial	-
ESRS S3-4 Human rights issues and incidents, section 36	Indicator number 14 in Table 3 of Annex 1	N/A	N/A	N/A	Immaterial	-
ESRS S4-1 Policies related to consumers and end-users, section 16	Indicator No. 9 in Table 3 Indicator number 11 in Table 1 of Annex 1	N/A	N/A	N/A	Material	166
ESRS S4-1 Failure to comply with the UN guiding principles on business and human rights and the OECD guidelines, section 17	Indicator No. 10 in Table 1 of Annex 1	N/A	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Article 12 (1)	N/A	Immaterial	-
ESRS S4-4 Human rights issues and incidents, section 35	Indicator No. 14 in Table 3 of Annex 1	N/A	N/A	N/A	Immaterial	-



Disclosure requirements and related data	SFDR reference	Reference to Pillar 3	Reference to the Benchmark Regulation	Reference to the EU Climate Law	Material / Immaterial	Page
ESRS G1-1 United Nations Convention against corruption, section 10(b)	Indicator No. 15 in Table 3 of Annex 1	N/A	N/A	N/A	Immaterial	-
ESRS G1-1 Protection of whistleblowers, section 10(d)	Indicator No. 6 in Table 3 of Annex 1	N/A	N/A	N/A	Immaterial	-
ESRS G1-4 Fines imposed for violations of laws against active and passive corruption, section 24 (a)	Indicator No. 17 in Table 3 of Annex 1	N/A	Delegated Regulation (EU) 2020/1816, Annex II	N/A	Material	178
ESRS G1-4 Rules for combating bribery and corruption, section 24(b)	Indicator No. 16 in Table 3 of Annex 1	N/A	N/A	N/A	Material	178





2. Environmental information

2.1 The EU Taxonomy

Regulatory context

In recent years, interest in ESG issues has surged at an unprecedented pace. In fact, in June of 2020, EU Regulation 2020/852, known as the **Taxonomy Regulation**, was adopted, establishing a clear classification system to define sustainable economic activities. This system enhances comparability among operators and promotes more responsible investment decisions.



In particular, according to the EU Taxonomy, an economic activity is considered environmentally sustainable if it meets the following criteria:

- 1** it makes a **substantial contribution** to at least one of the six **environmental and climate objectives** laid out under art. 9 of the Regulation;
- 2** it adheres to the **Do No Significant Harm (DNSH)** principle by avoiding significant harm to any of the other environmental objectives;
- 3** it complies with the **Social Minimum Safeguards**, as outlined by the principles and guidelines contained in international conventions and treaties.

The Taxonomy Regulation outlines six climate and environmental objectives, including:

- climate change mitigation;
- climate change adaptation;
- sustainable use and protection of water and marine resources;
- transition to a circular economy;
- reduction of pollution;
- protection and restoration of biodiversity and ecosystems.

For each objective, the European Commission has published a technical annex that not only identifies economic activities eligible to contribute to the objective, but also establishes the eligible activities, the Technical Screening Criteria (TSC), and the requirements for compliance with the DNSH principle.

In particular, over the years the European Commission has introduced the “Climate Delegated Acts”, which establish the main sectors and economic activities covered by the Taxonomy, along with the technical screening criteria required to evaluate their substantial contributions to the first two climate-related environmental objective;¹⁷ and the Taxonomy Environmental Delegated Act (2023/3851), which establishes the technical screening criteria for economic activities that significantly impact the other four environmental objectives of the EU Taxonomy.¹⁸ Simultaneously, amendments were made to two existing delegated acts: the Taxonomy Disclosures Delegated Act (2021/2178), which regulates the content and presentation of Taxonomy disclosures and the Taxonomy Climate Delegated Act (2021/2139).

Following its listing in 2023, Lottomatica Group now complies with the regulatory obligations laid out in article 8 of EU Regulation 2020/825. This article specifies the reporting obligations under the Taxonomy and clarifies that, in line with the developments in sustainability reporting, these obligations apply to all companies subject to the CSRD, which was implemented in Italy by Legislative Decree no. 125 of September 2024.

For the purpose of disclosing quantitative performance indicators (KPIs), the Group has adhered to the requirements of Annex I of the Taxonomy Disclosures Delegated Act 2021/2178, which mandates that Non-Financial Organisations are required to publish: i) the percentage of turnover generated from products or services associated with economic activities deemed environmentally sustainable; ii) the percentage of capital expenditure (CapEx) and operating expenditure (OpEx) related to assets or processes associated with economic activities aligned with the EU Taxonomy.

Analysis of eligibility and alignment with the Taxonomy

In continuity with the previous year, Lottomatica Group once again conducted a series of analyses in 2024 to identify economic activities eligible for the EU Taxonomy, aiming to verify their potential alignment in terms of Turnover, CapEx, and OpEx.

The **screening process** began with a preliminary mapping of potentially environmentally sustainable activities. Through a detailed quantitative analysis of Turnover, CapEx, and OpEx aggregates, the panel of potentially eligible activities, corresponding to each of the six environmental objectives, was identified. Based on this analysis, the individual Functions and the owners of Group activities potentially falling within the scope of the European Taxonomy were also identified.

Therefore, in collaboration with the responsible corporate Functions, an **eligibility** and **alignment** check was carried out to assess whether Lottomatica Group generates Revenues, CapEx, and OpEx from the activities previously mapped. This analysis led to the identification of the following activities:

17) The objectives defined by the Climate Delegated Act are (i) climate change mitigation, (ii) climate change adaptation.

18) The objectives defined by the Taxonomy Environmental Delegated Act are (i) the sustainable use and protection of water and marine resources, (ii) the transition to a circular economy, (iii) the reduction of pollution, and (iv) the protection and restoration of biodiversity and ecosystems.



List of potentially eligible activities identified

6. Transport

6.5 Transport by motorcycle, passenger car, and light commercial vehicle	Climate change mitigation (1) and adaptation objectives (2)
--	---

7. Construction and real estate activities

7.2 Renovation of existing buildings	Climate change mitigation (1) and adaptation objectives (2)
7.3 Installation, maintenance, and repair of energy efficiency devices	

Compared to the eligibility perimeter identified in 2023, this analysis revealed an increase in eligible activities, rising from 1 activity to **3 activities** across **2 sectors** identified by the Regulation (transport and construction and real estate activities).

In order to assess the alignment of the identified economic activities with the Taxonomy, a verification of compliance with the technical screening criteria, DNSH, and Social Minimum Safeguards was simultaneously conducted.

In this regard, the analyses did not identify any activities aligned with the EU Taxonomy, as compliance with the technical screening criteria was not able to be confirmed for the relevant activities. However, it should be noted that Lottomatica Group conducted its economic activities in compliance with the minimum safeguards laid out under Article 18 of EU Regulation 852/2020, adhering to the principles and guidelines of the international conventions and treaties.¹⁹ In order to verify compliance with the Social Minimum Safeguards, the Group considered the four issues identified by the Sustainable Finance Platform: Human Rights, Corruption, Taxation, and Competition.

In particular, the Group implements due diligence procedures in its business activities and utilises specific instruments, including the Code of Ethics and the Supplier Code of Conduct, which clearly outline the values and principles required of all parties with which it engages, as well as an Organisation, Management, and Control Model compliant with Legislative Decree no. 231/2001. Lottomatica has also adopted several policies²⁰ aimed at protecting human rights, such as the Corporate Policy on the Protection and Preservation of Human Rights, the Diversity and Inclusion Policy, and the Gender Equality Policy.

Details of the disclosure accompanying the KPIs for non-financial enterprises

Accounting standards

The purpose of this section is to explain the process of defining the turnover, capital expenditure, and operating expenditure figures related to eligible activities, in accordance with Annex I of Delegated Regulation (EU) 2021/2178.

19) Specifically, the Group conducted its activities in compliance with the principles enshrined in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including those set out in the eight core conventions of the International Labour Organisation (ILO) and the International Bill of Human Rights.

20) For further information on the Social Minimum Safeguards policies, please refer to section "Summary of Policies" in the "General Information" chapter.

With regard to Turnover, a thorough examination of the mapped economic activities contributing to the climate and environmental objectives, combined with an analysis of the management and accounting information related to Lottomatica's operations, revealed that it is not possible for the Group to quantify the numerator of the KPI in terms of either eligibility or alignment. This is because the economic activities associated with Lottomatica Group's core business differ from those listed in the Climate Delegated Act and the Environmental Delegated Act. As a result, for this financial year, the entire Turnover is attributed exclusively to activities not eligible for the EU Taxonomy. The Turnover's denominator, on the other hand, corresponds to the Group's revenues, as stated under the "**Revenues**" item of the Consolidated Statement of Comprehensive Income for the year ended on 31 December 2024.

In order to determine the share of capital expenditure eligible under the Regulation, the CapEx expenses recorded on the Consolidated Financial Statements, related to eligible activities, were taken into consideration.²¹ The denominator, however, was recalculated by summing the gross additions recognised in 2024 with the tangible and intangible assets, in accordance with IAS 16, 38, 40, and IFRS16, as shown in the tables of changes for Intangible Assets, Tangible Assets, and Rights of Use. The denominator also includes increases in tangible and intangible assets resulting from business combinations.²²

Finally, with regard to the numerator of the OpEx, following the criteria specified under point 1.1.3.2 of the Delegated Act, the portion of operating expenses related to eligible activities was calculated. The denominator, on the other hand, was determined by including non-capitalised direct costs associated with research and development, building renovation measures, short-term rental, and other maintenance and repair activities, whether performed by the company or third parties.²³

Assessment of compliance with Regulation (EU) 2020/852

Based on the analysis conducted, Lottomatica Group identified the following eligible activities that contribute to its climate change mitigation and adaptation objectives:

- **6.5 Transport by motorcycle, passenger car, and light commercial vehicle**, for the costs of leasing category M1 and N1 company cars under long-term lease agreements;
- **7.2 Renovation of existing buildings**, in relation to the expenses incurred by the Group for renovating gaming halls and, more broadly, managed buildings associated with the Organisation's operations;
- **7.3 Installation, maintenance, and repair of energy efficiency devices**, for investments made in renovating the Group's facilities, including heating, ventilation, and air conditioning systems, as well as the replacement of light sources with energy-efficient versions.

21) These assets were identified in accordance with the criteria laid out under point 1.1.2.2. of Delegated Regulation (EU) 2021/2178.

22) For further details, please refer to the items "Investments," "Business Combinations," and "Increases" in the 2024 Tables of Changes for Intangible Assets, Tangible Assets, and Rights of Use.

23) Point 1.1.2.1. of Delegated Regulation (EU) 2021/2178.



Contextual information

As previously indicated, revenues from Lottomatica Group's activities are considered entirely ineligible, as they do not fall within the scope of activities listed in the Climate Delegated Act and the Environmental Delegated Act.²⁴

Contextual information regarding the CapEx KPI

With regard to the capital expenditure KPI,²⁵ the portion of eligible economic activities amounts to approximately **€15** million, consisting of the following:

- **€5.1** million pertains to activity "6.5 Transport by motorcycle, passenger car, and light commercial vehicle", related to investments made in company vehicles in 2024;
- **€9.3** million pertains to activity "7.2 Renovation of existing buildings", related to renovation expenses incurred during the current financial year;
- **€0.6** million pertains to activity "7.3 Installation, maintenance, and repair of energy efficiency devices", related to the installation of equipment and light sources. This activity saw an increase in capital expenditure compared to the previous year due to the inclusion of plant engineering in the numerator calculation.

As a result, approximately 3.5% of capital expenditure for 2024 is eligible under the Taxonomy Regulation.

Contextual information regarding the OpEx KPI

With regard to the operational expenditure KPI,²⁶ the share of eligible economic activities is approximately **€0.9** million, consisting of the following:

- **€0.1** million pertains to activity "7.2 Renovation of existing buildings", related to operating expenses incurred for the renovation of buildings and gaming halls used for the Group's activities;
- **€0.7** million pertains to activity "7.3 Installation, maintenance, and repair of energy efficiency devices", related to the maintenance of light sources and systems within buildings and gaming halls used for the Group's activities.

As a result, approximately 0.07% of the operational expenditure for 2024 is eligible under the Taxonomy Regulation.

24) For more detailed information, please refer to the Taxonomy Template – Proportion of turnover from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2024.

25) For more information, please refer to the Taxonomy Template – Proportion of capital expenditure (CapEx) from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2024.

26) For more detailed information, please refer to the Taxonomy Template – Proportion of operating expenses (OpEx) from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2024.

Taxonomy Template

Proportion of turnover from products or services associated with Taxonomy-aligned economic activities – Disclosure covering year 2024

Financial year 2024	2024			Substantial Contribution Criteria					
Economic activities (1)	Code (2)	Turnover (3)	Share of turnover, year 2024 (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)
		€ MM	%	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL
A. TAXONOMY-ELIGIBLE ACTIVITIES									
A.1 Environmentally sustainable activities (taxonomy-aligned)									
Turnover of environmentally sustainable activities (taxonomy-aligned) (A.1)		-	0.00%	0.00%	-	-	-	-	-
Of which enabling		-	0.00%	0.00%	-	-	-	-	-
Of which transitional		-	0.00%	0.00%					
A.2 Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)									
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL
Turnover of taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities) (A.2)		-	0.00%	0.00%	-	-	-	-	-
A. Turnover of Taxonomy eligible activities (A.1 + A.2)		-	0.00%	0.00%	-	-	-	-	-
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES									
Turnover of taxonomy non-eligible activities		2,004	100%						
Total		2,004	100%						



DNSH ("do no significant harm") criteria									
Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of Taxonomy-aligned (A.1.) or eligible (A.2.) turnover, year 2023 (18)	Category enabling activity (19)	"Category transitional activity (20)"
Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T

No	No	No	No	No	No	Yes	-		
No	No	No	No	No	No	Yes	-		
No	No	No	No	No	No	Yes	-		

							-		
							-		

Proportion of Total Turnover

Taxonomy-aligned by objective		Eligible for taxonomy by objective
CCM	0.0%	0.0%
CCA	0.0%	0.0%
WTR	0.0%	0.0%
CE	0.0%	0.0%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

**Proportion of capital expenditure (CapEx) from products or services associated with
Taxonomy-aligned economic activities – Disclosure covering year 2024**

Financial year 2024	2024			Substantial Contribution Criteria					
Economic activities (1)	Code (2)	CapEx (3)	Proportion CapEx, year 2024 (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)
		€ MM	%	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL
A. TAXONOMY-ELIGIBLE ACTIVITIES									
A.1 Environmentally sustainable activities (taxonomy-aligned)									
CapEx of environmentally sustainable activities (taxonomy-aligned) (A.1)		-	0.00%	-	-	-	-	-	-
Of which enabling		-	0.00%	-	-	-	-	-	-
Of which transitional		-	0.00%	0.00%					
A.2 Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)									
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL
Transport by motorcycle, passenger car, and light commercial vehicle	CCM 6.5 / CCA 6.5	5.15	1.2%	EL	EL	N/EL	N/EL	N/EL	N/EL
Renovation of existing buildings	CCM 7.2 / CCA 7.2	9.30	2.20%	EL	EL	N/EL	N/EL	N/EL	N/EL
Installation, maintenance, and repair of energy efficiency devices	CCM 7.3 / CCA 7.3	0.61	0.14%	EL	EL	N/EL	N/EL	N/EL	N/EL
CapEx of taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities) (A.2)		15.07	3.56%	3.56%	0.00%	0.00%	0.00%	0.00%	0.00%
A. CapEx of Taxonomy eligible activities (A.1+A.2)		15.06	3.56%	3.56%	0.00%	0.00%	0.00%	0.00%	0.00%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES									
CapEx of taxonomy non-eligible activities		408.24	96.44%						
Total		423.31	100%						



DNSH ("do no significant harm") criteria							Proportion of taxonomy-aligned (A.1) or eligible (A.2) CapEx, Year 2023 (18)	Category enabling activity (19)	"Category transitional activity (20)"
Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)			
Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T

No	No	No	No	No	No	Yes	-	
No	No	No	No	No	No	Yes	-	
No	No	No	No	No	No	Yes	-	

	-	
	-	
	0.12%	
	0.12%	
	0.12%	

Proportion of CapEx/Total CapEx

Taxonomy-aligned by objective		Eligible for taxonomy by objective
CCM	0.0%	3.56%
CCA	0.0%	3.56%
WTR	0.0%	0.0%
CE	0.0%	0.0%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

Proportion of operating expenses (OpEx) from products or services associated with economic activities aligned with the Taxonomy – Disclosure covering year 2024

Financial year 2024	2024			Substantial Contribution Criteria					
Economic activities (1)	Code (2)	OpEx (3)	Proportion OpEx, 2024 (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)
		€ MM	%	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL
A. TAXONOMY-ELIGIBLE ACTIVITIES									
A.1 Environmentally sustainable activities (taxonomy-aligned)									
OpEx of environmentally sustainable activities (taxonomy-aligned) (A.1)		-	0.00%	0.00%	-	-	-	-	-
Of which enabling		-	0.00%	0.00%	-	-	-	-	-
Of which transitional		-	0.00%	0.00%					
A.2 Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)									
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL
Renovation of existing buildings	CCM 7.2 / CCA 7.2	0.13	0.01%	EL	EL	N/EL	N/EL	N/EL	N/EL
Installation, maintenance and repair of energy efficiency devices	CCM 7.3 / CCA 7.3	0.72	0.06%	EL	EL	N/EL	N/EL	N/EL	N/EL
Operating expenses of activities eligible for the taxonomy but not environmentally sustainable (activities not aligned with the taxonomy) (A.2)		0.85	0.7%	0.7%	0.00%	0.00%	0.00%	0.00%	0.00%
A. OpEx of activities eligible for taxonomy (A.1 + A.2)		0.85	0.7%	0.7%	0.00%	0.00%	0.00%	0.00%	0.00%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES									
OpEx of taxonomy non-eligible activities		1,252.35	99.93%						
Total		1,253.20	100%						

DNSH ("do no significant harm") criteria							Proportion of taxonomy-aligned (A.1) or eligible (A.2) OpEx, Year 2023 (18)	Category enabling activity (19)	"Category transitional activity (20)"
Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)			
Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T

No	No	No	No	No	No	Yes	-	
No	No	No	No	No	No	Yes	-	
No	No	No	No	No	No	Yes	-	

	-	
	-	
	0.00%	
	0,00%	

Proportion of OpEx/Total OpEx

Taxonomy-aligned by objective		Eligible for taxonomy by objective
CCM	0.0%	0.07%
CCA	0.0%	0.07%
WTR	0.0%	0.0%
CE	0.0%	0.0%
PPC	0.0%	0.0%
BIO	0.0%	0.0%

Gas and Nuclear Activities - Model 1²⁷

Nuclear Activities

1.	The company carries out, finances or has exposures to research, development, demonstration and implementation of innovative power generation plants that produce energy from nuclear processes with a minimum amount of fuel cycle waste.	No
2.	The company carries out, finances or has exposures to the construction and safe operation of new nuclear power plants for the generation of electricity or process heat, including for district heating purposes or for industrial processes such as hydrogen production, and improvements in their safety using the best available technology.	No
3.	The company carries out, finances or has exposures to the safe operation of existing nuclear power plants generating electricity or process heat, including for district heating or for industrial processes such as the production of hydrogen from nuclear energy, and improvements in their safety.	No

Fossil gas activities

4.	The company carries out, finances or has exposures to the construction or operation of power generation plants using gaseous fossil fuels.	No
5.	The company carries out, finances or has exposures to the construction, rehabilitation and operation of combined heat/cool and power generation plants using gaseous fossil fuels.	No
6.	The company carries out, finances or has exposures to the construction, upgrading and operation of combined heat/cool and power generation plants using gaseous fossil fuels.	No

2.2 Climate change [ESRS E1]

Safeguarding the environment is a **fundamental pillar** of the Group's strategy, which is essential to guarantee **sustainable and lasting growth** over time, something that Lottomatica aims to achieve by focusing particular attention on **energy consumption** and **greenhouse gas emissions**, encouraging **virtuous behaviour also along the value chain**. Below is the list of IROs that were found to be relevant by the double materiality analysis and that the Group is committed to addressing through specific policies and concrete actions based on the concept of climate change mitigation and energy consumption.

ESRS E1 – CLIMATE CHANGE

ESRS (SUB-TOPIC)	IRO	DESCRIPTION	POSITIVE /NEGATIVE EFFECTIVE /POTENTIAL	TIME HORIZONS	VALUE CHAIN
Climate change mitigation	I	Production of greenhouse gas emissions at all stages of the production chain of Lottomatica Group	Negative Actual	Short term Medium term Long term	Own Operations Upstream Downstream
Energy	I	Energy consumption from renewable sources in all stages of the production chain	Positive Actual	Short term Medium term Long term	Own Operations Upstream Downstream

Strategy

Disclosure
requirement
E1-1

Transition plan for climate change mitigation

Although the Lottomatica Group has not yet established a transition plan that meets the requirements of the ESRS standard, it is taking **significant steps as a leading public gaming company to address climate change**. Through its **environmental strategy**, the Group is actively committed

27) In accordance with Regulation 2021/2178, Model 1 of Annex XII to Regulation 2021/2178 with respect to the activities of Lottomatica Group is attached.



to contributing to the achievement of the 1.5°C global warming limitation targets set by the Paris Agreement. This strategy, known as the LESS (Lottomatica Environmental Sustainability Strategy), has been approved by the CEO, CFO, and CCO, and is centred around three key areas of action:

- **Environmental Impact**, aimed at enhancing energy efficiency, increasing the use of renewable energy sources, promoting environmental protection, and reducing impacts throughout the value chain;
- **Mobility Impact**, geared towards a series of initiatives aimed at optimising employee travel, also through the use of smart working practices;
- **Environment Culture**, aimed at raising employee awareness of environmental issues and ensuring adherence to the principles and commitments outlined in the Group Environmental Sustainability Policy.

Through the identification of **concrete actions and measurable medium-term objectives**, the Group aims to **reduce its carbon footprint**. One of the main tools for implementing the LESS strategy is the **decarbonisation plan**, through which Lottomatica aims to significantly reduce by 64% its direct greenhouse gas emissions over the next 10 years (Scope 1), and to reduce by at least 95% the emissions from energy purchases for offices and sales points by 2025 (Scope 2 market-based). Considerable efforts are also being made to reduce the most impactful Scope 3 categories, calculated according to the GHG Protocol. Developing the decarbonisation plan required a comprehensive assessment of direct, indirect, and value chain emissions. The results of this assessment led to the identification of the most effective decarbonisation levers and their valuation in economic terms:

- Green fuels sourcing;
- Green mobility;
- Green electricity sourcing;
- Supplier management (cat. 1);
- Green logistics (cat. 9).

The identification of these levers enabled the planning of targeted actions, such as:

- the zeroing of direct office emissions (Scope 1) by sourcing certified 100% green fuel and renewing the company fleet with electric and environmentally friendly vehicles;
- the zeroing of the indirect emissions of the offices and retail outlets (Scope 2) through the procurement of 100% certified green energy;
- the selection of suppliers that are mindful of the environmental sustainability of their activities, encouraging technological investments and responsible behaviours throughout the entire value chain, with the aim of reducing Scope 3 emissions.

For 2025, following an in-depth analysis of its carbon footprint, the Group is committed to identifying the most effective decarbonisation levers in alignment with the requirements of the Paris Agreement.

Disclosure
requirement related
to ESRS 2 SBM-3

Material impacts, risks and opportunities and their interaction with the strategy and business model

In April of 2024, Lottomatica launched a Climate Risk Assessment process to **identify and evaluate the physical and transitional climate-related risks** that could affect the Group's operations. In particular, the physical risks include events such as river and coastal floods, cyclones or tornadoes, hailstorms, landslides or avalanches, forest fires, high winds, water shortages, and heat and cold waves. Transition risks encompass regulatory and policy changes, technological advancements, market fluctuations, and reputational challenges. Lottomatica identified these risks as part of its broader strategy to align with leading climate reporting frameworks. This was achieved through a detailed analysis involving the following steps:

- mapping of climate risks;
- assessment of Lottomatica's vulnerability to these risks;
- evaluation and financial quantification of the climate risks;
- potential integration of these risks into the risk management framework -ERM Model.

Lottomatica's key strategic assets include its headquarters, gaming halls, betting shops, and strategic suppliers located throughout Italy. Due to their geographical locations, these assets are susceptible to physical risks that could result in business interruption days. The primary climate-related physical hazards in Italy that could disrupt operations are extreme heat waves, fires, river flooding, coastal flooding, and heavy rainfall. It was therefore possible to map the main climate risks, assess Lottomatica's vulnerability to these risks, and, where feasible, quantify the financial impact. This analysis was conducted in line with the guidelines of the leading rating agencies, particularly the Carbon Disclosure Project (CDP) and the Corporate Sustainability Reporting Directive (CSRD), with a specific focus on the ESRS E1 standard.

The Climate Risk Assessment conducted on the assets identified by Lottomatica Group revealed **no areas of critical risk**. In particular, the results of the impact in terms of business interruption days caused by acute physical risks showed that no assets would experience more than 10 Business Interruption Days (BIDs). For the directly managed gaming halls, the financial impact can be directly estimated using the EBITDA of these points of sale (retail network). No significant impacts related to short-term (2025 and 2030) climate-related risks were identified, even under the worst-case climate scenario. The business interruption days estimated by the analysis indicate minimal disruptions at most locations.²⁸

Although the analysis concluded that the physical and transitional climate-related risks are not currently significant, Lottomatica Group has reviewed and integrated them into its Enterprise Risk Management system to monitor and manage any potential future developments. On the other hand, the irrelevance of these risks excluded the need to conduct an analysis of the resilience of its strategy and business model in relation to climate change.

28) The climate risk analysis was performed considering the IPCC RCP (Representative Concentration Pathway scenarios 2.6, 4.5, 6.0 and 8.5) and on a 2025 and 2030 time horizon. In addition, the IPCC classification was used to represent different climate transition scenarios, each with different implications in terms of policies and technologies.



Description of processes for identifying and assessing relevant climate-related impacts, risks and opportunities

Disclosure
requirement related
to ESRS 2 IRO-1

For more information on climate change impacts, particularly the company's GHG emissions, please refer to ESRS E1-6, and for assessments of climate-related risks and opportunities, please refer to ESRS 2 SBM-3.

Management of impacts, risks and opportunities

Policies related to climate change mitigation and adaptation

Disclosure
requirement
E1-2

Environmental protection is a strategic priority for the Group, which is committed to preventing, managing, and, where feasible, reducing the environmental impacts of its operations — whether carried out directly or through suppliers and partners. This commitment is supported by the establishment of **specific policies**.²⁹ In this regard, the Environmental Sustainability Policy, which includes the Green Procurement Policy, addresses climate change mitigation, energy efficiency, and the promotion of renewable energy sources to achieve the goal of reducing the Group's energy consumption and associated emissions.

Actions and resources in relation to climate change policies

Disclosure
requirement
E1-3

In order to mitigate the adverse effects of emissions and enhance the positive impact of increased renewable energy consumption, the Group has implemented several climate change mitigation initiatives and actions, organised by decarbonisation lever. These initiatives resulted in an emission reduction of 1,441 tCO₂e.³⁰ In particular, with respect to decarbonisation levers, the following actions were carried out to 2024:

- **GREEN MOBILITY**

- **Use of non-private means of transport:** The company shuttle service plays a crucial role in promoting more sustainable collective commuting options with reduced atmospheric emissions. In order to enhance efficiency and encourage greater employee participation, timetables and routes were optimised in 2024 to better integrate with the rail network.
- **LTMCar:** The Group launched the “Let's Take My Car” carpooling app in order to discourage individual car use, promoting the sharing of commuting routes and expenses among colleagues who live nearby and have similar work schedules. Throughout the year, the app's usage was tracked, recording 141 downloads.
- **Electric/hybrid company fleet:** The Group periodically overhauls its company car fleet, replacing older models with newer ones that have a lower environmental impact. The pool car travelled 1,900 km, while two fully electric company cars were assigned to employees.
- **E – GAP:** Continuing its partnership with E-GAP in 2024, the Group enabled headquarter employees to conveniently recharge their electric vehicles on the go, contributing to global warming mitigation.

29) For more detailed information on the policies adopted by the Group for climate change mitigation, please refer to section “Summary of Policies” in the “General Information” chapter.

30) For further details on the economic actions and amounts in terms of capital expenditure (CapEx) and operational expenditure (OpEx) associated with the economic activities identified under Commission Delegated Regulation (EU) 2021/2178, please refer to the section 2.1 of this chapter, entitled “The EU Taxonomy.”

- **GREEN ELECTRICITY SOURCING**

- **Green Energy:** The purchase of certified renewable energy helps reduce greenhouse gas emissions and aligns with the climate change mitigation goals. In this regard, in 2024, 88,7% of the emissions generated by its electricity utilities came from GO-certified renewable sources and included 100% of directly operated halls.
- **Energy efficiency in buildings:** The installation of energy-efficient LED lamps helps reduce greenhouse gas emissions and supports climate change mitigation efforts. In 2024, all the lights in the corridors of the headquarters (HQ Aldobrandeschi) were switched to LED.

- **SUPPLIER MANAGEMENT (CAT. 1)**

- **Green Procurement:** Prioritising suppliers with environmentally friendly products or services is essential for advancing a more sustainable model, while at the same time fostering environmental awareness and education. In procurement processes, suppliers are assessed not only on technical and economic criteria, but also on sustainability. This factor can provide a competitive advantage in the evaluation process.

- **MAINTENANCE OF ISO 14001:2015 CERTIFICATION:** In 2024, the Group maintained and expanded its environmental management system certifications based on the principle of risk management (ISO 14001). The following companies were certified in 2024: Marim, Big Easy, PWO, Totosi and Betflag.

Main actions	Field of application	Time horizons
Green Energy	The concessionaire's direct network gaming halls	Each year
Energy efficiency in buildings	Aldobrandeschi Headquarters	Each year
Use of non-private means of transport	Aldobrandeschi Headquarters	Each year
Green Procurement	Lottomatica Group	Each year
LTMCar	Aldobrandeschi Headquarters	Each year
E – GAP	Aldobrandeschi Headquarters	Each year
Electric/hybrid company fleet	Aldobrandeschi Headquarters	Each year
Maintenance of ISO 14001:2015 Certification	Gamenet; GBO Italy; Lottomatica Videolot Rete; Marim; Big Easy; PWO; Totosi; Betflag	Each year

Action	Type of financial resources	CapEx (€)	OpEx (€)	Link with financial statement items	Future financial resources (€)
Green Energy	Provision of services	-	22,987.41	Costs for services - Utilities, postage and logistics, security services	25,000
Energy efficiency in buildings	Provision of services	-	21,000	Costs for services - utilities, postage and logistics, security services	-
Use of non-private means of transport	Provision of services	-	147,433	Personnel costs - Other personnel costs	150,000
LTMCar	Internal development	n/a	n/a	n/a	n/a
E – GAP	Provision of services	-	1,000	Costs for services - Other	7,000
Electric/hybrid company fleet	Provision of services	-	8,000	Costs for services - Rentals, leases and other lease transactions	8,000
Maintenance of ISO 14001:2015 Certification	Provision of services	-	110,105	Costs for services - tax, administrative, legal and financial consulting	46,900

The transitioning of multiple electricity consumers across all Group companies to suppliers that provide 100% renewable energy certified by Guarantees of Origin requires the allocation of sufficient resources. Similarly, operating the Repair Lab to minimise the volume of WEEE waste leaving the organisation necessitates the assignment of dedicated personnel to the lab.

With the data collected for GHG emissions 2024, it will be possible to set quantitative reduction targets during 2025 that also refer to the following areas:

- stationary plants: continuing the shift to 100% renewable energy, electrifying gas utilities, and fostering agreements with network partners to achieve 100% renewable energy usage;
- mobile plants: low-emission or zero-emission company vehicles;
- low-emission logistics services.

Metrics and targets

Targets related to climate change mitigation and adaptation

Disclosure
requirement
E1-4

Through its LESS strategy, the Group aims to substantially reduce its carbon footprint over the medium term contributing to the achievement of the objectives within the Environmental Sustainability Policy, and it has set **decarbonisation targets** encompassing the operations of both the Group companies and their value chain. In fact, by implementing this decarbonisation plan, the Group is projected to reduce, **compared to 2023**, its **Scope 1 emissions by 64% by 2033, to reduce by at least 95% its Scope 2 market-based emissions by 2025**, and to cut its **Scope 3 emissions by 36% always with respect to 2033**.

Emissions	Base year	Base value	Target year ³¹	Target value	Reduction %
Scope 1 Emissions	2023	5,019 tCO ₂ e	2033	1,807 tCO ₂ e	-64%
Scope 2 Emissions	2023	2,142 tCO ₂ e	2025	107 tCO ₂ e	-95%
Scope 3 Emissions	2023	49,806 tCO ₂ e	2033	31,876 tCO ₂ e	-36%

Methodologies and assumptions for target setting

The Group employs the market-based method to calculate its Scope 2 emissions. The base year for Lottomatica's decarbonisation plan is 2023. Changes in the GHG inventory calculation methodology, favouring point data over spend-based methods, alongside adjustments to the Group's corporate perimeter following acquisitions of new companies, ensure that progress measurements accurately reflect external influences. The Procurement function directly oversees the achievement of the Scope 2 emission reductions. In 2023, the Lottomatica Group conducted a carbon footprint assessment following the GHG Protocol, the international standard for reporting greenhouse gas emissions. This Protocol provides for three emission categories: Scope 1 (direct emissions from company operations); Scope 2 (indirect emissions from purchased energy); Scope 3 (indirect emissions occurring along the value chain). The decarbonisation levers implemented in 2024 pri-

31) For Scope 2 GHG emissions, the target year was not set at 2030 because Lottomatica Group already plans to reduce its emissions by 95% in 2025.

marily targeted Scope 2 emissions by expanding the number of electricity consumers using 100% renewable energy with certified Guarantees of Origin. The GHG emission reduction targets, as well as the objectives for managing climate-related IROs, were established by analysing two scenarios: business as usual (BAU) and market evolution. The decarbonisation levers proposed by the ten-year decarbonisation plan build upon the initiatives already implemented by the Group. The data gathered concerning the 2024 GHG emissions will serve as a basis for setting quantitative reduction targets in 2025, which will focus on the following areas:

A dedicated corporate function, together with the Environmental Sustainability Committee established in 2024 (which includes the Internal Audit Department), continuously monitors the alignment of GHG emission reduction targets with the scope of its inventory. The Group is also considering adopting ISO 14064 certified systems in the near future.

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

- With regard to **Scope 1**, the Group aims to **reduce its emissions over the next 10 years through the purchase of Guarantees of Origin (GOs) for biomethane**. In this scenario, the year in which to begin purchasing GOs has been set at 2028. The BAU scenario estimates a 2% annual increase in gas consumption at the headquarters. Based on the potential market evolution lever, it is assumed that purchasing GOs for biomethane will also be possible in Italy. Using this lever, emissions from gas consumption are projected to decrease by 61% by 2033 with respect to the 2023 baseline. Another lever concerning the gradual transformation of the company fleet was also identified. The analysis scenario assumes a reduction in emissions due to the gradual shift to electric vehicles or other technologies within the car fleet starting in 2026, coinciding with the expiration of the current lease contracts. The BAU scenario reflects the emissions from the fuel used by Lottomatica's car fleet without any the application of any lever, assuming an annual increase of +1% in the total number of cars. With the identified lever, which involves replacing 5 diesel vehicles in the Group's car fleet with 5 electric vehicles each year, emissions from car fuel usage will decrease by 3% by 2033 with respect to the 2023 baseline.
- With regard to **Scope 2**, the lever considers the **purchase of Guarantees of Origin (GOs) to reduce emissions from electricity used in the Group's direct gaming halls** not yet covered by GOs.
- With regard to **Scope 3**, potential levers have been analysed, which are still being defined as the calculations are ongoing. In particular, with regard to category 1, the Purchased goods and services emissions, the emission reductions are considered due to technological advancements and growing awareness among market players in adopting sustainable and green initiatives. The scenario considers the Scope 3 Category 1 impact (Purchased goods and services emissions), with a 26% reduction by 2033 compared to the BAU Scenario. As a responsible leader, Lottomatica has already implemented an extensive green procurement program, as outlined in its Environmental Policy and Supplier Code of Conduct. This policy mandates that all suppliers comply with environmental laws, regulations, and standards, implement an effective system to identify and mitigate environmental risks, and take measures to continuously improve their environmental management systems and performance. The Suppliers must uphold the principles of recycling, reuse, and reducing consumption. They must also commit to reducing their consumption of energy and other resources, reducing the waste and emissions that they produce, and constantly increasing their use of renewable energy sources. Regarding categories 4 and 9, upstream and downstream transportation distribution, a market analysis was conducted, factoring in the emission reductions resulting



from the gradual adoption of electric vehicles by suppliers, which is projected to lead to a 10% reduction in emissions per year. With respect to the emissions that would occur in 2033 under the BAU scenario, there is a 65% reduction. With respect to the baseline emissions of 2023, the reduction amounts to 53%.

Energy consumption and mix

Disclosure
requirement
E1-5

The consumption of electricity within offices, gaming halls, and sales outlets are the main sources of direct and indirect energy consumption, the values of which have been aggregated in the following table, calculated in MWh.

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		8,284.91
Petrol for motor vehicles	MWh	2,342.06
LPG for motor vehicles		41.42
From renewable sources		
HVO biodiesel for motor vehicles		26.19
Total fuel consumption from fossil sources		25,998.50
Energy purchased	u.m.	2024
Electrical energy purchased from non-renewable sources		1,544.14
Electrical energy purchased from nuclear sources		0
Electrical energy purchased from renewable sources	MWh	26,392.00
Energy purchased for district heating		64.96
Total energy purchased		28,001.10
Total energy consumption	u.m.	2024
Total energy consumption from fossil sources		27,516.45
Total energy consumption from nuclear sources		0
Total energy consumption from renewable sources		26,483.14
<i>Of which: fuel consumption from renewable sources, including biomass (also including industrial and municipal waste of biological origin), bio-fuels, biogas, hydrogen from renewable sources</i>	MWh	26.19
<i>Of which: consumption of electricity, heat, steam and cooling from renewable sources, purchased or acquired</i>		26,392.00
<i>Of which consumption of self-produced renewable energy without using fuels</i>		0

Disclosure
requirement
E1-6

Gross Scopes 1, 2, 3 and Total GHG emissions

Total emissions	u.m.	2024
Scope 1 Emissions		
Gross Scope 1 emissions	tCO ₂ e	5,956.46
Scope 1 emissions covered by regulated emissions trading schemes	%	0
Scope 2 Emissions		
Gross Scope 2 location-based emissions	tCO ₂ e	6,666.06
Gross Scope 2 market-based emissions		720.63
Scope 3 Emissions		
Total gross Scope 3 location-based indirect emissions		73,868.86
Total gross Scope 3 market-based indirect emissions		73,259.59
1. Purchased goods and services		4,360.03
Subcategory: Cloud computing and data centre services		238.54
2. Capital goods		14,132.16
3. Fuel and energy-related activities (not included in Scope 1 or 2) location-based		2,537.42
3. Fuel and energy-related activities (not included in Scope 1 or 2) market-based	tCO ₂ e	1,928.10
4. Upstream transport and distribution		6,250.43
5. Waste generated during the course of operations		209.01
6. Business travel		351.50
7. Employee commuting		3,058.46
8. Upstream leased assets		3,668.29
9. Downstream transportation		10,001.84
11. Use of the products sold		23,114.71
13. Downstream leased assets		5,946.54
Total emissions		
Total emissions (location-based)	tCO ₂ e	86,491.45
Total emissions (market-based)		79,936.68

The intensity of greenhouse gas emissions in relation to net revenues is a key indicator for assessing the Group's environmental efficiency.

Intensity of emissions with respect to net revenues	u.m.	2024
Total emissions (location-based) with respect to net revenues	tCO ₂ e / €	0.0000431
Total emissions (market-based) with respect to net revenues		0.0000398

Estimates and assumptions for calculation

Lottomatica Group's corporate scope has evolved significantly in recent years, making it necessary to **continuously refine the methodology used to calculate GHG emissions**. Up until the 2023 Sustainability Report, particularly for Scope 3 emissions, spend-based quantification methods were also employed due to technical and organisational feasibility. These methods were chosen because



they minimised the operational burden on the processes and structures responsible for monitoring environmental performance, given the Group's broad and diverse business activities. Consequently, during the course of 2024, Lottomatica initiated an organisational and procedural enhancement process, which allowed for more detailed data collection. This, in turn, allowed the spend-based methods to be replaced with approaches that more accurately reflect specific emission sources, including activity-based, production-based, and distance-based analyses. This approach involved a detailed examination of each Group company's core business, the GHG emission significance of the upstream and downstream supply chain interactions, and the identification of categories and corresponding emission sources that most accurately represent the Group's environmental impact, in accordance with the ESRS E1 standard. Therefore, for the preparation of this Sustainability Statement, in line with the CSRD requirements, an in-depth analysis of the corporate scope was carried out to accurately reflect the organisational holdings with emission relevance. This was achieved by applying the operational control criterion and establishing a hierarchical framework for calculating GHG emissions (organisation carbon footprint) up to the first level of Lottomatica Group (Lottomatica Group S.p.A.).

In 2024, Lottomatica adopted a dual and interchangeable framework for Carbon Footprint calculation, enabling the Group to report GHG emissions according to both the **GHG Protocol and the ISO14064 standard**. The methodological procedure for collecting, organising, and measuring GHG emissions involved several steps applied to each Group company:

- 1. GHG Analysis:** this phase was carried out through a series of training and shadowing workshops conducted by the specialised emissions team. The purpose was to analyse the primary emission sources associated with the activities of each legal entity within Lottomatica Group. In particular, thanks to the active involvement of Lottomatica's Environmental Committee and the designated contacts (either top management or cross-functional organisational figures with in-depth knowledge of the specific business), the analysis was focused on identifying the main activities of each company in order to determine its GHG emission impact profile. Through the analysis of the emission sources' significance, this process made it possible to identify the "facilities" (including individual plants, groups of facilities, or stationary and mobile production processes) within each organisational boundary from which one or more GHG emission sources could originate. For indirect emissions, a significance analysis (magnitude, influence, and accountability) was conducted to determine the inclusion or exclusion of specific categories for the following stages of data collection and GHG inventory.
- 2. GHG data collection:** this phase involved gathering data for all the Group's companies through the ESGeo application tool, primarily for Scope 1 and Scope 2 primary data as well as for data on waste diverted or destined for disposal, while Scope 3 primary data were collected using the guided calculation folder. For example, activity data were gathered on emissions such as the amount of energy consumed (m³), fuel used (l), electricity consumption (kWh), material produced by type of good (kg), and capital goods purchased by type of good (kg) for more than a total of 360 climate change relevant environmental impact activities for about 110 types of GHG emitting sources.
- 3. GHG Inventory:** in this phase, the list of significant GHG sources identified and their respective quantified emissions for each legal entity were structured and defined, followed by the subsequent review and aggregation at the first-level subsidiaries and the top-level Lottomatica Group. The main emission factors applied were those from ISPRA and DEFRA, deemed appropriate for calculating the organisation's carbon footprint using both activity-based and production-based methodologies. For some specific GHG-generating activities, sector studies

have been used, such as for cradle-to-gate factors related to vehicles and trucks, and cloud services operations.

For the sake of completeness, it should be noted that the primary source of asynchrony between Lottomatica's GHG emission reporting requirements and the availability of data from multiple suppliers primarily stems from goods or services acquired during the final period of 2024 (fourth quarter or December). All Group companies were required to consolidate the necessary performance data as soon as possible (no later than January 2025). Finally, where supplier data were unavailable, an estimate based on historical trends and factual validation of activities with relevant GHG emissions was requested. The most significant GHGs, as stipulated in the Kyoto Protocol, were included in the emissions calculation.

The main complementary contractual instrument used by Lottomatica Group for purchased electricity is the Guarantee of Origin — an electronic certification issued by the GSE attesting to the renewable origin of the energy sources utilised. With regard to the Scope 2 GHG emissions related to imported energy, if a Lottomatica Group company does not acquire the corresponding GO for its electricity purchase, the market-based methodology (which allows Lottomatica to classify the consumed energy as renewable based on GO certification) cannot be applied. Consequently, the GHG emission impact expressed in CO₂e cannot be reported as zero. In such cases, or rather without GOs, Lottomatica instead applies the location-based approach, considering the energy mix of the country where the relevant stationary user is located. The GHG emission impact, expressed in CO₂e, is therefore calculated using the emission factor corresponding to that country's electricity consumption (e.g. Italy, Malta, Serbia, Austria, etc.). No significant biogenic CO₂ emissions from Scope 1 were identified during the course of the significance analysis, as there was no evidence of organic materials or biomass being used in Lottomatica's operational and production processes. In specific cases, such as resource outflows involving wood, the corresponding CO₂ emission contribution has been incorporated into the respective emission factor.

All CSRD perimeter companies within Lottomatica Group were included in the significance analysis, which formed the basis of data collection for the Group's Carbon Footprint. The significance analysis carried out for each company revealed the main categories of GHG-emitting sources. The Scope 3 emission categories are outlined below in accordance with the order and nomenclature provided by the GHG Protocol, along with the relative calculation methodology applied.

1. **Purchased goods and services:** based on the data regarding recurring or business-defining product purchases, weights and quantities were determined and subsequently converted using material-specific conversion factors. The main services considered material for the Group are Data Centre and Cloud services, for which the open-source Cloud Carbon Footprint methodology was applied.
2. **Capital goods:** the capital goods capitalised in the asset book and directly related to Lottomatica's business activities are mainly electrical and electronic equipment (i.e. Information Technology), electromechanical equipment (e.g. for the gaming offer) and vehicles (for commercial and logistics activities). The GHGs themselves were calculated with conversion factors relating to the use of IT materials and metals or using product carbon footprint values (as per the Low Carbon Vehicle Partnership source). The furnishings were considered for the Billions and Big Easy large direct rooms and for the Gamenet and Lottomatica Videolot Rete concessionaires. With regard to "capital goods", the GHG impact allocation for the year of reference is calculated using the annual depreciation rates as per the Ministry of Economy and



Finance Decree of 31/12/1988 and subsequent amendments and additions (i.e. Electromechanical and electronic machines including computers 20%, Transport vehicles 20%, Cars 25%, Furniture 12%). Only for the annual depreciation rate relating to VLT gaming machines, based on the financial depreciation logic used for the financial statements, the depreciation rate is set for VLT machines at 12.5%.

3. **Fuel- and energy-related activities** (not included in Scope 1 or 2): based on the consumption data reported under Scope 1 and Scope 2, emissions resulting from the production and transportation of purchased energy were assessed, considering network losses of 10% in LV and 3.8% in MV, as indicated by ARERA. Well-to-tank (WTT) conversion factors were applied to fuels and other imported energy.
4. **Upstream transport and distribution:** emissions from upstream transport were calculated using a weighted conversion factor, assuming 30% of the journey by van and 70% by articulated lorry, in line with typical express courier routes within Italy.
5. **Waste generated in operations:** an LTM Group company can only accurately report output resource data for each of its locations if its recovery or disposal activities are supported by processes that enable proper quantification, whether mandated by regulatory requirements or operational practices. For example, if a company procures services from authorised private sector operators for the collection and treatment of materials and waste (whether classified as Municipal Solid Waste, special waste, or hazardous waste) due to either regulatory obligations or operational agreements with the local public service, these operators issue appropriate documentation. Such documentation, where applicable, also contributes to reporting through the Unified Environmental Declaration Form (MUD). Consequently, at present, the GHG emission impact can only be calculated for companies that have established classification and quantification processes for output resources as described above. Lastly, therefore, operational sites that rely solely on a municipal collection service compliant with the Ta.Ri. waste management scheme and do not fall within the framework of the MUD documentation outlined above are not classified as generating significant GHG emissions in 2024. This classification is also due to the inability to quantify outgoing resources (unless the local public waste manager issues formal certification of the collected material quantities and their destinations).
6. **Business trips:** the total kilometres travelled are converted based on the mode of transportation used (short-term rental car, train, or plane). Like in 2023, a daily mileage of 150 km per rental is estimated for 2024.
7. **Employee commuting:** the GHG emission impact is calculated for each mode of travel based on kilometres travelled, while emissions related to remote work are assessed based on hours worked from home.
8. **Upstream leased assets:** this category primarily includes assets similar to capital goods, but without ownership rights, as they are acquired through rental, leasing, or revenue-sharing contracts to generate value. In these cases, the cradle-to-gate emission impact is conventionally distributed over a 5-year period, which represents the standard average contract duration and typical usage period for inventoried capital goods.
9. **Downstream transport:** from the kilometres used for downstream transport, a weighted conversion factor was used, calculated for 30% of the journey by van and 70% by articulated lorry, for the typical journeys of an express courier in Italy (coefficients calculated on the basis of ISTAT 2022 statistics, prudential approach, see similar reference for category 4). This category also conventionally includes emissions related to the transport of customers and visitors at Lottomatica's direct rooms larger than 1000sqm, as per subcategory 3.4 of ISO14064:2018.
11. **Use of products sold:** the usage scenarios for the products/services that generate Lottomatica Group's primary revenue streams have been aligned with those of the physical gaming

business. The estimated energy consumption of the gaming devices managed by the Group's companies is based on an operational period specific of the type of the machine/channel, with typical electricity consumption levels for each device type. Similarly, the online gaming business considers the estimated consumption of users' devices, factoring in the number of users and the average duration of gaming sessions. It should be noted that this category includes all energy consumption relating to gaming machines operated at the premises of parties outside Lottomatica; this classification brings into this category 11, relating to the use of products sold, part of the GHG emissions that in the 2023 reporting year had been classified in category 13, i.e. downstream leasing activities.

12. End-of-life treatment of products sold: an analysis of this category revealed that Lottomatica Group engages extensively in the refurbishment of electronic gaming cards, carried out by specialised Group companies, as well as the refurbishment of gaming machines in general, thus contributing to their long life cycle. Lottomatica Group also provides digital services, which do not generate any significant waste materials. Consequently, all relevant end-of-life materials are disposed of and reported under category (5) Waste generated in operations.

13. Downstream leased assets: this specific category is specifically measured for GHG emissions related to the electrical energy consumption generated by IT terminals and equipment operated at the Lottomatica Group's betting sales network, as capital goods made available to the network to carry out certain sales, user information, promotion and provision of its services through indirect physical channels.

Categories 10 (Processing of sold products), 14 (Franchising), and 15 (Investments) were not identified as significant sources of GHG emissions.

Disclosure
requirement
E1-9

Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

For more details on the expected financial effects of the physical climate risks resulting from the Climate Risk Assessment, please refer to Disclosure Requirement E1 ESRS 2 SBM-3.

2.3 Resource use and circular economy [ESRS E5]

Lottomatica Group regards **environmental protection** as a **strategic priority** in its pursuit of sustainable value creation, and remains committed to the **efficient use and management of natural resources and waste, promoting responsible practices** throughout its value chain. The following is a list of relevant IROs from the double materiality analysis that the Group actively manages through targeted policies and tangible actions aligned with the principles of a circular economy, with the aim of minimising resource waste and promoting responsible waste management.



ESRS E5 – USE OF RESOURCES AND CIRCULAR ECONOMY

ESRS (SUB-TOPIC)	IRO	DESCRIPTION	POSITIVE / NEGATIVE ACTUAL / POTENTIAL	TIME HORIZON	VALUE CHAIN
Waste	I	Generation of waste that requires disposal (incineration/landfill) rather than recycling	Negative Actual	Short term Medium term Long term	Own Operations Upstream Downstream

Lottomatica Group's offices and gaming halls generate almost exclusively municipal solid waste, most of which is adequately separated and disposed of through public waste collection services based on the criteria established by the Municipalities in which they're located. The disposal of special waste (hazardous and non-hazardous) and waste similar to municipal waste that is not managed at the municipal level is entrusted to qualified companies that ensure the application of the current regulations.

Management of impacts, risks and opportunities

Policies related to resource use and circular economy

Disclosure
requirement
E5-1

Lottomatica's circular economy commitments and **policies**³² focus on **minimising resource consumption and waste generation**. The Group also **encourages its suppliers to comply with environmental regulations and implement circular economy principles** to continuously improve their adopted management systems and improve their overall environmental performance.

Actions and resources related to resource use and circular economy

Disclosure
requirement
E5-2

In 2024, the Group launched **multiple initiatives focused on circularity and sustainable resource management**, in order to mitigate the negative impacts of waste generation, including:

- **Repair Lab - Repair / Disposal:** The in-house repair workshop evaluates whether company assets can be repaired, reused, or disposed of, in accordance with the ISO 14001-certified company procedures. To this end, it engages in daily circular economy activities, such as the repair and maintenance of all electronic assets, enabling the Group to minimise its environmental impact, extend product life cycles, and reduce waste production, while at the same time ensuring compliance with the current regulations. In 2024, a total of 13,660 different electronic assets were processed, with 84.5% being successfully refurbished or re-purposed. If an asset is deemed irreparable or unsuitable for reuse, on the other hand, the Repair Lab categorises the waste in compliance with relevant regulation on the topic, thus optimising waste management, ensuring regulatory compliance, and maintaining stricter control over hazardous waste materials. 14.5% of the electronic assets processed in 2024 were disposed of, representing a slight decrease from 14.6% in 2023.
- **Redemption of electronic devices:** Lottomatica Group allows its employees to redeem their company computers and mobile phones for personal use through a dedicated redemption process, thus extending the life cycle of the company assets and reducing their environmental impact. In this regard, 40 corporate devices were redeemed in 2024, and a redemption / donation campaign involving 180 PCs is being planned for 2025.

³²) For further details on the Group's circular economy policies, please refer to section "Summary of Policies" in the "General Information" chapter.





- **Donation of electronic devices:** Lottomatica also donates unused or unredeemed electronic equipment to third-sector organisations, thus extending the life-cycles of these company items, optimising waste management, and avoiding unnecessary production. In this regard, 6 corporate devices were donated in 2024, and a redemption / donation campaign involving 180 PCs is being planned for 2025.
- **Waste separation:** The Group adheres to local regulations for waste collection, and optimises its waste management by prioritising proper waste separation to ensure its correct disposal and minimise environmental impact. In this regard, a monitoring process was introduced in 2024 to track the volume of municipal waste generated at the Aldobrandeschi site.
- **Become green:** The “Become Green” internal awareness campaign launched in 2020 promotes sustainable practices and encourages waste separation through educational materials. In particular, 17 employees took part in a beach clean-up event held in Ostia in 2024, in collaboration with Ambiente Mare Italia.
- **GoSign:** As part of its sustainability efforts, the Group launched a digitisation project in 2022 aimed at progressively reducing its office paper consumption and, consequently, municipal waste. In particular, using the InfoCert Group's GoSign platform, Lottomatica has significantly reduced its paper usage by enabling digital uploads and signatures for documents, such as supplier contracts, purchase orders, work agreements, and policy approvals, and has also greatly reducing the number of printouts needed for the relevant intermediate stages. In 2024, the year the platform became fully operational, more than 185,000 pages were processed, representing an almost 600% increase from the 27,330 pages recorded in 2023. This upward trend is expected to continue in 2025, potentially reaching 220,000 pages, reflecting a 20% growth.
- **FSC Paper:** Lottomatica Group is committed to optimising its use of FSC-certified thermal paper for printing gaming receipts. While the current legislation does not yet permit the complete dematerialisation of these documents, the Group Companies are continuously working to minimise their paper usage while ensuring compliance with the industry regulations. In keeping with its efforts from previous years, in 2024, all paper for office and stationery use at the Rome headquarters on Via degli Aldobrandeschi was 100% recycled and FSC certified.
- **CFP Assessment:** In order to enhance the circular design of its products, in late 2024 and early 2025 Lottomatica initiated a preliminary assessment to measure and report on its carbon footprint (CFP), following the internationally recognised Life Cycle Assessment (LCA) standards. This initiative will provide greater insights into the materials and components used in the Group's manufacturing processes, with the prospect of also obtaining ISO 14067 certification in the coming years.

Main actions	Field of application	Time horizons
Repair Lab - Repairs	Concessionaires	Each year
Repair Lab - Disposal	Concessionaires	Twice a year
Redemption of electronic devices	Aldobrandeschi Site	Each year
Donation of electronic devices	Lottomatica Group	Each year
Waste separation	Aldobrandeschi Site	Each year
Become green	Aldobrandeschi Site	2024
GoSign	Lottomatica Group	Each year
FSC Paper	Aldobrandeschi Site	Each year
CFP Assessment	Lottomatica Group	2025

Action	Type of financial resources	CapEx (€)	OpEx (€)	Link with financial statement items	Future financial resources (€)
Repair Lab -Repairs	Purchase of goods	-	96,400	Goods and other purchases	95,000
Repair Lab -Disposal	Provision of Services	-	9,400	Other operating costs and expenses	10,000
Become green	Donation	-	1,500	Other personnel costs	-
GoSign	Purchase of software licenses	28,060	-	Tangible fixed assets – software	12,200
FSC Paper	Purchase of goods	-	2,448.42	Other operating costs and expenses – purchases of goods and other purchases	2,500
CFP Assessment	Provision of Services	-	5,490.00	Costs for services – tax, administrative, legal and financial consulting	14,640

Metrics and targets

Targets related to resource use and circular economy

Disclosure
requirement
E5-3

The Group remains committed to waste prevention in alignment with its Environmental Sustainability Policy, ensuring that all waste generated is managed in accordance with the applicable laws and internal regulations. In this regard, no specific quantitative waste reduction targets have been set, also considering the fact that, in carrying out its business activities, the company almost exclusively generates waste comparable to municipal waste. However, in addition to adopting monitoring KPIs to assess the effectiveness of the Environmental Sustainability Policy and initiatives undertaken to reduce the impact of waste generation, as described in the previous paragraphs, the Group is considering setting targets within its sustainability strategy.

Resource outflows

Disclosure
requirement
E5-5

Lottomatica has also established a **structured waste management and monitoring system**, which includes periodically updated procedures, oversight of outsourced operations, and ongoing employee communication and awareness programmes to encourage waste reduction. In 2024, a total of 830.03 tonnes of waste were generated, of which 346.22 tonnes were classified as hazardous, and mainly fell into two categories:

- municipal waste, generated through standard office, gaming hall, and warehouse operations, which is sorted and mostly managed by public collection services according to Municipal guidelines;
- hazardous and non-hazardous special waste, mainly resulting from activities at the Repair Lab, and the AWP and VLT divisions.

The **disposal** of special **waste** (hazardous and non-hazardous) and waste similar to municipal waste that is not managed at the municipal level is **entrusted to qualified companies** that ensure the application of the current regulations. The main type of waste produced, consistent with the Group's sector, is electrical / electronic, and is mainly derived from the use of AWP machines, VLTs and gaming hall equipment. These waste materials can be hazardous or non-hazardous, and mainly consist of electrical / electronic components, printer ink, and lithium for batteries.

2024			
Waste diverted from disposal	u.m.	Hazardous waste	Non-hazardous waste
Preparation for re-use		0	41.89
Recycling		0	80.69
Other recovery operations	t	164.16	341.93
Total		164.16	464.51
		628.66	

2024			
Waste directed to disposal	u.m.	Hazardous waste	Non-hazardous waste
Incineration		0	0
Landfill disposal		0.06	19.31
Other disposal operations	t	182.00	0
Total		182.06	19.31
		201.37	

Non-recycled waste	u.m.	2024
Non-recycled waste	t	201.37
Total waste		830.03
Percentage of waste not recycled	%	24.26

The methodology used to calculate the amount of municipal waste resulting from the TARI took into account the prevailing activity of the property, the square metres, and the period of ownership. For special waste, the methodology was based on the analysis of the Waste Identification Form (FIR), which accompanies the transport of any type of waste, and, in particular, the so-called “fourth copy,” which indicates the quantities, types and treatment of the waste consigned by the Group to companies authorised to transport and deliver it to recovery and/or disposal sites.







3. Social information

3.1 Own workforce [ESRS S1]



Lottomatica Group prioritises the **protection** and **well-being** of its workforce as a key **strategic priority** for creating sustainable value. It remains committed to fostering **fair, safe, and inclusive working conditions** while **actively promoting employees' rights**.

Lottomatica Group prioritises the protection and well-being of its workforce as a key strategic priority for creating sustainable value. It remains committed to fostering fair, safe, and inclusive working conditions while actively promoting employees' rights.

The following is a list of Identified Relevant Outcomes (IROs) from the double materiality analysis that the Group actively manages through targeted policies and tangible actions aimed at advancing equity, skills development, organisational well-being, and the protection of diversity and inclusion.

ESRS S1 - OWN WORKFORCE

ESRS (SUB-TOPIC)	IRO	DESCRIPTION	POSITIVE / NEGATIVE ACTUAL / POTENTIAL	TIME HORIZON	VALUE CHAIN
Working conditions	I	Employment stability and work-life balance	Positive Actual	Short term Medium term Long term	Own operations
	I	Violations of rights and regulations concerning working conditions	Negative Potential	Medium term Long term	Own operations
	O	Flexible and hybrid work models can enhance employees' work-life balance while simultaneously reducing personnel costs		Short term Medium term Long term	Own operations
	I	Raising employee awareness of occupational health and safety issues	Positive Actual	Short term Medium term Long term	Own operations
	I	Workplace accidents	Negative Actual	Short term Medium term Long term	Own operations
	R	Inadequate/partial compliance with the occupational health and safety regulations		Short term Medium term	Own operations
Equal treatment and opportunities for all	I	Incidents of discrimination and gender pay disparity	Negative Actual	Short term Medium term Long term	Own operations
	I	Employee attraction, development, and training	Positive Actual	Short term Medium term Long term	Own operations
	O	Investment in training and skill development programmes, including funded training and e-learning, can help attract and retain a highly qualified and diverse workforce while managing associated costs effectively		Short term Medium term Long term	Own operations
Other work-related rights	I	Human rights violations	Negative Potential	Medium term Long term	Own operations
	I	Cyber attacks and/or theft of information	Negative Potential	Medium term Long term	Own operations
	R	Incorrect/lack of management of logical access constraints		Short term Medium term	Own operations
	R	Untimely, incomplete and/or incorrect implementation of the established security policies and specifications		Short term	Own operations
	R	Failure to identify actions to prevent cyber attacks or theft of information and data		Short term Medium term	Own operations
	R	Inadequate establishment, implementation, review, maintenance or improvement of the Information Security Management System (ISMS) within the context of the implementation and management of information systems and services related to the legally required retention activities		Short term Medium term	Own operations
	R	Inadequate data management, in terms of: confidentiality, integrity and availability		Short term Medium term	Own operations



Strategy

Material impacts, risks and opportunities and their interaction with the strategy and business model

Disclosure
requirement related
to ESRS 2 SBM-3

The Group's workforce primarily consists of employees, and all individuals upon whom Lottomatica may have a material impact are included within the scope of disclosure under ESRS 2. This inclusion is based on the IRO analysis conducted through the double materiality process. In addition, the material negative impacts identified are not structurally linked to Lottomatica, but instead arise from isolated incidents, as they consist of specific cases affecting individuals rather than the entire organisational structure.

At the same time, the Group generates positive impacts through initiatives designed to address the employees' daily needs, while safeguarding and enhancing their rights. Key measures include inclusive contractual policies, employee welfare and well-being programs, an ISO 45001-certified safety management system, health and safety awareness campaigns, coaching and professional development courses, and partnerships with higher education and specialised training institutions.

Lottomatica continuously carries **out control activities on workforce-related risks and opportunities** across three main areas:

- **Funded training:** by implementing professional development programmes and strengthening employee skills (through both funded training and e-learning), the Group aims to attract and retain a highly qualified and diverse workforce;
- **Smart working:** with its flexible working model, the Group aims to improve its employees' work-life balance;
- **Retention:** adequate salaries and stable employment conditions help retain talent, reducing turnover and minimising delays in replacing resources. These initiatives proactively address resource management challenges by optimising resource allocation, enhancing engagement, and strengthening corporate resilience, thus fostering a sustainable, inclusive, and growth-oriented work environment.

In line with its environmental strategy "LESS" (Lottomatica Environmental Sustainability Strategy), the Group remains dedicated to promoting environmental awareness through targeted programmes and initiatives within the Become Green project pillar, which was established in 2019 to raise awareness of sustainability among the Group and its employees. Feeling as if they are part of a shared commitment to environmental protection, the employees develop a stronger sense of belonging and motivation, viewing the company as an active participant in building a better future. **Environmental awareness** thus becomes a unifying force, **reinforcing corporate identity and cohesion** while directly enhancing both individual and collective well-being. Initiatives such as office waste separation, plastic bag recycling (in Serbia), and the installation of water dispensers to encourage the use of thermal water bottles at the corporate headquarters not only improve the workplace environment, but also inspire responsible and proactive behaviour among employees. In addition to these efforts, in 2024, the Group launched its first volunteer initiative, organising a clean-up day in collaboration with Ambiente Mare Italia to help restore a beach along the Roman coastline.

It should be noted that no operations in 2024 posed a significant risk of forced or compulsory labour. Moreover, Lottomatica has not identified any categories of its workforce that are particularly vulnerable to adverse effects stemming from specific characteristics, work environments, or job functions, nor any significant risks or opportunities that would impact specific groups of workers separately from the workforce as a whole. The analysis did not reveal any relevant risks of this nature.

Management of impacts, risks and opportunities

Disclosure
requirement
SI-1

Policies related to own workforce

Lottomatica has implemented **specific workforce management policies**³³ designed to guarantee **respect for human rights** and ensure a **fair and safe working environment**. In particular, the Policy on the protection and preservation of Human Rights, approved by the Board of Directors, applies to all subjects within the Group's value chain, including employees, suppliers, partners, and customers. It is focused on non-discrimination, fair and favourable working conditions, health and safety, training, and the protection of freedom of association and collective bargaining. It also explicitly addresses the prevention of child labour and forced labour.

Lottomatica's workforce **policies** align with the **internationally recognised standards** and are **re-viewed annually** based on assessments and monitoring of the national and global trends in the field of fundamental rights protection. In particular, through its policies and Code of Ethics, the Group **adheres** to the **principles of the Universal Declaration of Human Rights**, the **International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work**, and the **eight core ILO Conventions**, including those on forced labour (Conventions 29 and 105), freedom of association (87 and 98), equal remuneration (100), non-discrimination in employment (111), and the abolition of child labour (138 and 182).

Lottomatica employs **structured tools to engage and listen** to employees, including discussions with the HR team, periodic surveys, and onboarding processes, all aimed at fostering **active employee participation** in company decision-making. In order to safeguard workers' rights, the company has established **reporting mechanisms** and **procedures** for managing and addressing any negative impacts on human rights. These include the Whistleblowing Procedure and the dedicated whistleblowing system. Moreover, Lottomatica has implemented an occupational safety management system that ensures continuous monitoring of working conditions, provides risk training, and supplies accident prevention tools.

The Group has **introduced targeted policies to eliminate discrimination and promote equal opportunities**. These policies explicitly affirm that Lottomatica operates with impartiality and does not tolerate any form of direct or indirect, multiple, or inter-related discrimination based on gender, age, disability, ethnic, social, or geographical background, trade union affiliation, language, religion, political or sexual orientation, gender identity, nationality, marital status, or socio-cultural background. The company's commitment to diversity and inclusion is reinforced through a dedicated policy that not only guarantees fair treatment, but also includes specific measures to

33) For more detailed information on the policies adopted by the Group concerning its own workforce, please refer to the "Summary of Policies" section in the "General Information" chapter.



support the most vulnerable groups within the workforce. The implementation of these policies is supported by corporate procedures designed to prevent and address incidents of discrimination, fostering an inclusive and respectful work environment for all.

- **HR Processes:** The recruiting process upholds the values of diversity and inclusion, ensuring transparency and impartiality in the selection process. Job postings include explicit statements against all forms of discrimination.
- **Certifications:** Lottomatica has obtained UNI/PdR 125:2022 Certification for Gender Equality, has been recognised as a Top Employer Italy, and has received awards for its Diversity & Inclusion initiatives.
- **D&I Governance:** Lottomatica has established a dedicated D&I Committee and appointed a D&I Manager, who are supported by five thematic working groups that develop and oversee the D&I Plan for 2024-2025.
- **Training and awareness:** the Group promotes initiatives such as “Women Empowerment” and “Unconscious Gender Bias” awareness, and courses on inclusive language and gender equality, in collaboration with organisations like Valore D and Parole O_Stili.

Special attention is also paid to the removal of architectural barriers in order to improve accessibility for employees with disabilities. The Venice office was relocated to an accessible facility, while in Rome, two evacuation sleds were purchased to ensure safety in emergency situations, with specific training provided for the floor staff.

Lottomatica **communicates its policies with clarity and transparency** through the corporate intranet and institutional website, ensuring accessibility for all stakeholders. In this regard, **multiple communication channels** are utilised, ensuring accessibility for all, including vulnerable groups. Moreover, to facilitate understanding of the published editorial content, materials are provided in multiple languages and presented through infographics, videos, and motion graphics. The MyLottomatica Intranet has also been available in English as of 2024, featuring bilingual content and subtitled videos to ensure the inclusion of international employees. The effectiveness of the diversity and inclusion policies is continuously monitored through structured procedures, periodic risk assessments, the dedicated system for reporting violations (including whistleblowing), and an enforcement framework that includes appropriate penalties. The company collects feedback from employees via surveys and the “Talk to HR” tool on the Intranet.





People Strategy

In establishing its own workforce strategy, Lottomatica has adopted an **integrated approach** that not only mitigates risks related to workforce management, but also capitalises on new opportunities for personal and professional development. It is within this context that Lottomatica's **People Strategy** arose in 2022. In fact, starting with the corporate DNA and the goal of further consolidating the sense of belonging within a single large Group, this **medium/long term programme** keeps track of the **development** pathways of both the staff and the **Organisation** in terms of **culture, tools, systems**, and **processes**, even in relation to the company's sustainable growth objectives.

The Group's People Strategy is guided by **three key priorities**:

- **Enabling:** Investing in people development, and cultivating the staff's potential and skills through dedicated learning plans, projects, and programmes.
- **Empowerment:** Promoting excellent organisational behaviour, performance, and processes through a strong leadership and responsibility model consistent with the company's DNA.
- **Engagement:** Feeding everyone's passion and energy, improving team spirit and personal well-being, so that everyone will feel more proud of their Group and the work they do every day. These drivers aren't vertical in terms of function or organisation, but rather constitute the nodes of a "network" type system that synergistically links a series of activities involving everyone who belongs to the Group.

Lottomatica has also established clear internal policies outlining **guidelines** for **workplace health and safety**, adopting **advanced risk prevention protocols** and ensuring compliance with the **highest industry standards**. Continuous training remains a fundamental pillar, with retraining programmes accessible through digital platforms and personalised learning pathways designed to meet both technical and cross-functional skill development needs. **Work-life balance**, along with the active promotion of diversity and human rights, is another central focus, ensuring equal opportunities for all employees. While these policies are designed to benefit the entire workforce, specific plans and interventions may be implemented to address the unique needs of certain groups of employees.

Management of occupational health and safety risks

As previously mentioned, the accident prevention policy is based on the thorough **assessment of workplace risks**. This assessment is conducted by the Occupational Health and Safety Manager (OHSM) for each Group company, on behalf of the Employer. It involves identifying potential hazards, evaluating the risks within the working environment, and establishing prevention and protection measures to minimise them. By way of example, these measures include the mandatory use of Personal Protective Equipment (PPE) for specific groups of employees. Another crucial aspect of accident prevention is ensuring that workers receive thorough information and **training** on the specific risks associated with their tasks, as well as on the necessary **prevention and protection measures**, with **periodic updates** provided as needed.

In addition, the OHSM is responsible for drafting and updating the Emergency and Evacuation Plan (EEP) where necessary, outlining the measures to be taken in the event of an emergency. Where an EEP is not required, emergency cards are prepared as an alternative to serve the same purpose. Finally, the OHSM and the Competent Physician conduct annual inspections at each of the Group's sites to assess workplace health conditions and determine whether any corrective actions are needed.

Workers and the environment

Lottomatica ensures transparent communication regarding any changes to its policies, providing context on strategies to mitigate risks and potential negative impacts on employees as the company transitions to more sustainable operations. In alignment with the Environmental Sustainability Policy, Lottomatica promotes **awareness initiatives** to encourage employee participation. Employee concerns regarding sustainability-related changes are also addressed through the Environmental Sustainability Committee, which promotes **retraining programmes and the creation of new job opportunities**, ensuring a fair, inclusive, and sustainable transition.

Skill development

Lottomatica places the **growth** and **development** of its personnel at centre stage through its People Strategy, with a particular focus on the People Growth and Development pillar. The company invests in continuous training, using tools such as the MyEvaluation platform to assess and develop key competencies and virtuous behaviour. The training initiatives include goFluent for language learning, HRC for soft and hard skills development, and Yunicity, in collaboration with Valore D, to promote diversity and inclusion. All of the courses can be accessed at any time. The training hours increased by 37% in 2024 with respect to 2023. In addition, the StepUp programme was strengthened to enhance the potential of employees through experiential training, networking, webinars and professional and language development courses.

The group keeps track of its training work: it maintains an "Attendance Log" for on-site training courses to ensure accurate monitoring of participation. The form is given to the instructor at the start of the course and collected at the end, with each participant's signature recorded. For e-learning courses, on the other hand, participation is tracked through detailed reports provided directly by the digital platform provider. All training activities conducted throughout the year, regardless of format, are documented in a structured archive called the "Training summary file." This file contains



essential details, such as the course type, participant name, course date, and course duration. This file is regularly updated and securely maintained to ensure transparency and the traceability of employees' professional development courses. As previously mentioned, the Group tracks recruitment and promotion through tools such as regular surveys, the "Talk to HR" tool, and career path reports. The impact of training on professional growth is assessed using the "Course Evaluation Form" and the "Training Effectiveness Form". Obtaining certifications such as **Top Employer Italia and UNI/PdR 125:2022** further validate the Group's commitment to transparency and employee development.

Processes for engaging with own workers and workers' representatives about impacts

Disclosure
requirement
S1-2

Lottomatica is committed to taking its workforce's perspectives into account when managing any relevant, actual and potential impacts that may affect its personnel. The company collects feedback and comments from employees and their representatives on issues that might affect their working conditions. The **perspectives of the workforce guide the business decisions**, ensuring that human resource management policies meet the **employees' needs** and any **emerging work-related challenges**, with a **focus on** any positive or negative **impacts** that could affect working conditions.

Engagement takes place both **directly** with employees, through digital tools such as people surveys, the "Talk to HR" tool, and meetings with the HR team, and **indirectly** through dialogue with employee representatives, including Workers' Safety Representatives (WSRs), with whom annual meetings are held to review occupational health and safety matters.

The Group **actively promotes employee engagement and listening through instruments that foster dialogue and participation**. The onboarding process for new hires includes several interactions involving HR, such as the Personal Onboarding Day, Coffee with HR, and Monthly Onboarding Day initiatives, as well as many others, not to mention digital tools like surveys and questionnaires to gather continuous feedback. An annual pulse survey is also administered, and exit interviews are used to collect information on the reasons why resources have chosen to leave the company. At the training level, the employees fill out evaluation forms on the quality of the courses and the effectiveness of the skills learnt. Interviews regarding work-related stress risk are also conducted, and the workers take active part in emergency drills. The company also values the contribution of its workers, using tools such as the Box of Ideas, which allows proposals to be collected via a physical box or through Yammer.

Operational responsibility for employee involvement lies with the HR department, which coordinates the various activities through its different areas. The Chief People Officer (CPO) is responsible for ensuring that workforce inclusion takes place in a structured manner, ensuring that HR policies are aligned with the corporate objectives.

Lottomatica has adopted an **inclusion and respect for human rights Policy** for all its employees, setting out **principles** and **guidelines** to foster a **fair and respectful working environment**. Although the company does not have a global framework agreement on human rights with the employee representatives, the company policy provides for structured listening mechanisms. One example of this is the Level II agreement with the workers' representatives at the Aldobrandeschi site. The effectiveness of the employee engagement is assessed through company surveys and various

listening channels, with a particular focus on improving working conditions and fostering inclusive practices. The outcomes of these initiatives are continuously monitored to measure the impact of the actions taken on the well-being of the workforce.

The Group is committed to maintaining an inclusive and accessible work environment, with special attention being paid to vulnerable groups, such as women, migrants, and people with disabilities. Lottomatica ensures that **all employees have equal access to communication and feedback channels**, valuing their perspectives and needs in order to create a fair and discrimination-free workplace. The company's Diversity & Inclusion policies and regular medical examinations contribute to monitoring and enhancing working conditions for employees with specific needs. The company actively removes barriers that could hinder employee engagement, including language, cultural, and gender-related challenges, adopting an **inclusive approach** that considers the needs of specific groups, such as people with disabilities, parents, and caregivers. The communication channels are designed to be easily accessible, ensuring that all employees can actively participate and provide feedback.

Disclosure
requirement
S1-3

Processes for engaging about negative impacts and channels for own workers to raise concerns

Lottomatica has established structured processes to prevent and address negative impacts on its workforce. Through its **integrated governance and control system**, the company conducts **periodic assessments to identify and evaluate internal and external risks**, in order to identify any concerns relating to the employees' rights. In response to incidents that could negatively affect employees, Lottomatica follows a structured procedure that includes identifying the issue, analysing its root causes, and taking corrective measures. The Group—as previously mentioned—has also implemented a confidential **reporting system** for both its employees and external stakeholders, ensuring prompt and secure processing of any concerns reported. An internal **disciplinary system** ensures that any non-compliant behaviour or issues are promptly addressed and rectified.

In addition, the Group continuously monitors the effectiveness of the corrective measures taken, through internal audits, company surveys, and direct discussions with employees.

In order to strengthen direct communication between the company and its workforce, Lottomatica has established **multiple reporting and engagement channels**, including:

- the **Whistleblowing** procedure, accessible to employees, collaborators, business partners, and third parties, allowing confidential reports to be submitted via the EthicsPoint platform or a 24/7 telephone service;
- the **People Survey**, conducted by the HR team to monitor key indicators such as credibility, respect, fairness, cohesion, and corporate pride;
- the **Talk to HR** system, a digital feature on the company intranet that allows employees to submit confidential requests to the HR team;
- **Exit Interviews**, conducted to gather feedback from departing employees in order to improve engagement and business processes;
- **Dedicated health and safety channels**, including specific email addresses for contacting the company physician or the occupational health and safety department.



The company has implemented a formal system for receiving, analysing, and managing concerns, reports and complaints. In particular, Lottomatica, ensures the maximum **guarantee of confidentiality** and, if requested by the reporter, anonymity and has chosen as channels for sending reports a digital platform 'EthicsPoint Platform' and a dedicated telephone channel, available 24 hours a day. In addition to the whistleblowing system, other internal communication tools are actively promoted to ensure that every employee has access to appropriate channels for expressing concerns or reporting violations.

Lottomatica raises awareness of its reporting channels and ensures their accessibility through various internal communication tools. Information on these mechanisms is disseminated via institutional emails, the company intranet, and onboarding materials. The Whistleblowing Channel is also accessible from personal devices, allowing for flexible and remote use. Lottomatica takes proactive measures to ensure that **all reporting channels are inclusive and accessible**, overcoming any cultural or organisational barriers that might hinder their use.

All reports received undergo a **transparent handling process**, starting with a preliminary review within seven days of receipt. If deemed relevant, reports undergo investigation and resolution within three months, with feedback provided to the whistleblower. The process is managed by the Internal Risk, Ethics & Compliance and the Corporate & Legal Affairs Departments, which coordinates the audits with the relevant corporate areas. All reports deemed relevant following the preliminary investigation undergo further examination by:

- the Risk, Ethics & Compliance Department, which, in coordination with the Corporate & Legal Affairs Department, conducts an inspection, potentially involving the Departments/Areas interested and/or involved, and the reported party/whistleblower, while also informing the CEO of the Lottomatica Group and the CEOs of any companies implicated in the report;
- the Supervisory Board, for reports relevant for the purposes of Legislative Decree no. 231/01, which may proceed autonomously (as outlined in the 231 Model of the company implicated in the report) or with the support of the Internal Audit & GRC and Anti-Bribery & Corruption Department, another Department/Corporate Area, or third parties;
- in case of relevant reports for the purposes of UNI PdR 125:2022, the Chief People Officer, who may proceed either autonomously or with the support of the the Risk, Ethics & Compliance Department, another Department/Corporate Area, or third parties.

At the conclusion of the inspection, even if the report is determined to be unfounded, the Risk, Ethics & Compliance Department, along with the Corporate & Legal Affairs Department and, if necessary, the Department responsible for the investigations, prepare a report summarising the investigations conducted and the findings that emerged.

Afterwards, the Risk, Ethics & Compliance Department and the Corporate & Legal Affairs Department present the investigation results to the relevant Corporate Bodies/Departments for evaluation, enabling them to take appropriate measures. If deemed necessary, they may also:

- coordinate with the Head of the relevant Department to develop an action plan to address any identified weaknesses in the internal control system;
- collaborate with other relevant Departments on initiatives to safeguard the Group's interests (e.g. pursuing legal action).

The Whistleblowing system guarantees **employees and external parties** the ability to **report violations in a protected and anonymous manner**, reinforcing the corporate governance model. In order to ensure whistleblower protection, the Procedure states that Lottomatica Group safeguards individuals who, at the time of reporting, filing a complaint with judicial or accounting authorities, or making a public disclosure, have reasonable grounds to believe that the information they are reporting or disclosing is true and falls within the scope of this procedure. Whistleblower protection is not only guaranteed during an active legal relationship, but also in the following cases:

- before the legal relationship begins, if the information about the violations was obtained during the selection process or other pre-contractual stages;
- during the probationary period;
- after the legal relationship has ended, if the information about the violations was acquired while the relationship was active.

The protection measures also apply to:

- facilitators (natural persons who assist whistleblowers during the reporting process while operating within the same employment context, whose assistance must remain strictly confidentiality);
- individuals within the same work environment as the whistleblower or public discloser, who share a stable sentimental or familial bond with them, up to the fourth degree of kinship;
- co-workers who share the same work environment and maintain a regular and ongoing relationship with the whistleblower or public discloser;
- entities owned by the whistleblower, those employing the whistleblower, and entities operating within the same employment context as the whistleblower.

Lottomatica **constantly assesses employees' awareness** of reporting channels through communication and training initiatives. During the onboarding process, employees receive detailed information on the available channels, while awareness-raising campaigns are organised throughout the year through e-mail and content on the intranet. Awareness is also raised through e-learning courses, which include final tests to check understanding of the procedures.

The effectiveness of the reporting processes is continuously monitored through best practice analyses, internal audits, and regulatory updates.



Taking action on material impacts on value chain workers and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions

Disclosure
requirement
S1-4

Lottomatica has adopted a **structured approach to managing workforce impacts**, implementing **measures aimed at preventing and mitigating any negative effects** while **promoting initiatives that generate tangible benefits** for employees. The company takes swift action to address and resolve any critical issues, ensuring ongoing evaluation and improvement of the implemented measures. The key actions undertaken, planned, and in progress, as well as the methods for monitoring and evaluating the results, are detailed below.

With regard to health, safety, and accident prevention, Lottomatica has planned a series of initiatives focused on **continuous improvement**. These include a reassessment of the prevention and protection measures, accompanied by comprehensive training, information sessions, and regular updates for employees. In addition to the legally required courses, additional training sessions will also be provided, with periodic checks established by the company physician. In the event of a workplace accident, the Occupational Health and Safety Manager (OHSM) promptly intervenes to determine its causes and establish a corrective action plan, as detailed in the section on workplace accidents. Beyond addressing incidents as they occur, the Group also continuously monitors the effectiveness of the actions taken.

With regard to inclusion, the company maintained along the path already mapped out by Diversity & Inclusion, thanks also to the activities of the five dedicated working groups, committed to promoting an inclusive culture both in terms of communication and through concrete actions.

With regard to collective bargaining and social dialogue, Lottomatica maintains a **continuous and constructive dialogue with workers' representatives**, both directly and through employers' associations, ensuring a collaborative and proactive work environment.

The **protection of personal data** is another critical focus for Lottomatica, as reflected in its planned initiatives concerning privacy and confidentiality. In order to mitigate cyber risks and prevent data loss, the Group continuously monitors and updates its policies and conducts regular tests and inspections to ensure security and compliance with the international regulations.

Monitoring and reporting actions play a vital role in ensuring the success of these initiatives. Lottomatica has established continuous monitoring mechanisms, such as company climate surveys and dedicated listening channels, to gather feedback from the workforce. Insights from this analysis inform the development of specific action plans, which may include mediation efforts or adjustments to company policies. The quantitative KPIs are reviewed monthly for Training and quarterly for Health & Safety, Welfare & Well-being, and Employment Stability, serving as the foundation for implementing targeted action plans. Lottomatica follows an integrated monitoring approach that involves internal functions, such as HRO, **Corporate Legal**, and **Internal Audit**. This approach guarantees that all of the company policies adhere to the highest standards of responsibility, ethics, and sustainability.

Lottomatica Group remains committed to implementing best practices, ensuring that all activities are carried out in such a way as to prevent or mitigate significant negative impacts on its workforce.

The Group pays particular attention to critical areas, including procurement, sales, and data management, in order to ensure the operations are consistently aligned with the highest standards of ethics and responsibility. Moreover, dedicated professionals and organisational structures manage key areas such as compensation, workplace safety, and employee well-being.

A dedicated budget is allocated to support these initiatives, ensuring the necessary resources for effective implementation, continuous improvement, and compliance with the highest standards in these areas. This integrated approach effectively addresses workforce needs, with a strong emphasis on creating a safe and equitable working environment for all employees.

In this context, the Group has developed and implemented targeted action plans designed to achieve its objectives effectively. These initiatives are strategically structured, taking the available resources, the time frames, and the potential challenges into account in order to ensure tangible results.

Human rights

- **CCNL:** the Group applies the national collective labour agreements, thus guaranteeing working conditions for its employees that are consistent with industry standards and regulations. The company also steadfastly safeguards the right to freedom of association and trade union expression, ensuring that all employees are able to freely exercise their right to organise and participate in trade union activities, without fear of restriction or intimidation.
- **Local communities:** the Group is actively engaged in social inclusion initiatives aimed at promoting the right to education and culture, with particular attention to young people.
- **Training:** the Group provides access to targeted and customised training courses through advanced e-learning platforms, including Younicity and the Learning Square Platform. Training hours per employee have increased significantly, 8,940 in 2022, 22,241 in 2023, and 30,474 in 2024.

D&I

- **Fair-pay project:** the Group has implemented targeted measures to adjust lower salaries, ensuring employees receive fair compensation in line with industry standards.
- **Training:** the Group actively promotes the corporate culture by organising specific training programmes e.g. Gender Unconscious Bias, Women Empowerment and through the uploading of video pills on the Training Portal on D&I topics.
- **Partnerships:** the Group has forged strategic partnerships with “Valore D” and “Parole O_Stili” to strengthen the corporate culture through dedicated webinars.
- **Recruitment through the A.I.P.D. (Italian Association of People with Down Syndrome):** the Group promotes inclusion through the integration of a staff member from the A.I.P.D. within its organisation.
- **Food drive:** the Group organises periodic food drives to support charitable organisations, contributing to the fight against hunger, marginalisation, and poverty.
- **Partnership with Rosso for blood donation:** Lottomatica Group is committed to alleviating the blood shortage crisis through its partnership with Rosso.



Gender equality

- **Gender pay gap:** the company has introduced measures aimed at progressively closing the gender pay gap, with the goal of achieving full gender equality by 2030.
- **Women in management:** targeted personnel selection strategies are in place to increase the representation of women in managerial roles.

Adoption of smart working

- The Group allows employees to work remotely for up to two days per week, with possible exceptions granted based on company policy. In 2024, 92% of employees benefited from smart working, fostering a better work-life balance.

Main actions	Field of application	Time horizons
Human Rights – National Collective Labour Agreements (CCNL)	All Lottomatica Group employees in countries where collective bargaining is in place	Every new hire
Human Rights – Local Communities	-	The initiatives are carefully selected during the drafting of the sustainability plan
Human Rights - Training	Lottomatica Group	Each year
D&I - Fair-pay project	The initiative impacted 7% of the Group's workforce	Each year
D&I Trainings	-	Each year
D&I Partnerships	-	Each year
D&I Recruitment with A.I.P.D. (Italian Association of People with Down Syndrome)	1 resource	2024
D&I - Food drives	The 2024 edition of the food drive campaign was conducted at 12 company locations across 6 Italian regions. This initiative potentially engaged 1,696 employees and resulted in the collection of 1,347.95 kg of food, which was distributed to local charitable organisations	Each year
D&I - Partnership with Rosso for blood donation	2 events were organised within the company in 2024, with around 50 employees participating as blood donors	Each year
Gender equality - Gender pay gap	Lottomatica Group	Each year
Gender equality - Women in management	Lottomatica Group	Each year
Adoption of smart working	in Lottomatica Group where the job role allows	Each year
Maintenance of 45001 Certification	Lottomatica Group, Gamenet, GBO, LVR, Betflag, PWO, and Totosi	Each year
Best HR Team	Lottomatica Group	Each year
Top Employer	Lottomatica Group	Each year
UNI/PdR 125	Lottomatica Group	Each year
ISO 26000:2020 Certification	Lottomatica Group	Each year

Action	Type of financial resources	CapEx (€)	OpEx (€)	Link with financial statement items	Future financial resources (€)
Human Rights – National Collective Labour Agreements (CCNL)	N/A	-	-	-	-
Human Rights -Local Communities	Donations	-	104,825	Other operating costs and charges -Other operating costs and charges. Costs for services - Tax, administrative, legal and financial consulting	-
Human Rights-Training	-	-	292,804.44	Tab. Costs for services -Other	355,250
D&I -Fair-pay project	-	-	-	N/A	-
D&I -Training	Provision of Services	-	5,328	Tax, administrative, legal, and financial consulting	42,000
D&I -Partnerships	Provision of Services	-	36,470	Tax, administrative, legal, and financial consulting	9,760
D&I -Recruitment with A.I.P.D. (Italian Association of People with Down Syndrome)	-	-	-	-	-
D&I -Food drives	-	-	-	-	-
D&I -Partnership with Rosso for blood donation	Provision of Services	-	11,102	Tax, administrative, legal, and financial consulting	12,200
Gender equality -Gender pay gap	-	-	-	-	-
Gender equality -Women in management	-	-	-	-	-
Adoption of smart working	-	-	-	-	-
Maintenance of 45001 Certification	Provision of Services	-	160,746	Tab. Costs for services -Tax, administrative, legal and financial consulting Tab. Costs for services -Other	-
Best HR Team	Provision of Services	-	650	Tab. Costs for services -Other	1,830
Top Employer	Provision of Services	-	28,670	Tab. Costs for services -Other	28,670
UNI/PdR 125	Provision of Services	-	1,220	Tab. Costs for services -Other	25,000
ISO 26000:2020 Certification	Provision of Services	-	10,187	Tab. Costs for services -Tax, administrative, legal and financial consulting Tab. Costs for services -Technical assistance and network management services	30,000

The following actions are planned or currently under way to leverage relevant opportunities.

In 2025, the Group will continue to support flexible working arrangements and work-life balance initiatives, building on the successes of the previous year. One new initiative involves extending a programme already implemented in Serbia to the Italian workforce as well, offering personalised gifts to employees who become new parents, aimed at supporting during the initial phases of this significant life event. This initiative not only demonstrates a commitment to employee well-being and family support, but also aligns with the company's broader strategy of fostering an inclusive culture that's attentive to the employees' needs, values parenthood, and promotes a healthy work-life balance. Professional development programmes and talent enhancement initiatives, including

funded training and e-learning, remain a strategic priority for attracting and retaining a highly skilled and diverse workforce, while at the same time optimising training and turnover costs.

The key ongoing or planned initiatives include:

The StepUp Programme

A structured 16-month development initiative targeting selected employees, with progress measured through specific KPIs. The programme is divided into three main categories for its first edition: Young, Senior, and Ready. The primary objectives are:

- to cultivate and develop the participants' potential;
- to create a distinctive leadership style in line with the Lottomatica competency model;
- to design customised pathways for professional growth and career advancement;
- to improve the retention of high-potential talent.

Women at the Top Programme

An initiative dedicated to developing female talent, targeting female managers already holding leadership roles. This funded programme aims to enhance the participants' organisational effectiveness, and empower them to make a more significant impact in their professional spheres, fostering an inclusive and inspiring leadership example.

Individual coaching courses

Lottomatica has developed specific coaching courses for key figures within the organisation. These courses are designed to bridge the skill gaps identified through assessments and feedback to develop and strengthen essential leadership qualities, including change management. Some of these initiatives have been funded, with more planned for 2025.

The Team Coaching Course for Jolly Group

Lottomatica launched a course designed for a team made up of individuals from previously independent companies, the primary goal of the course was to build a cohesive and collaborative team. To facilitate post-acquisition integration. Led by an expert coach, the project used individual and group coaching sessions to enhance team cohesion and maximise performance.



Sustainability Mentorship

Lottomatica launched an innovative initiative focusing on sustainability issues, guiding an internal Mentee through a journey of growth led by Mentors. This project aims to:

- stimulate sustainability awareness, and foster inspiration and innovation;
- promote leadership focused on “Give Back”, creating a positive impact both within the organisation and in the broader community;
- foster a collaborative, inter-company environment that supports holistic sustainable development.

Starting New Executives

Lottomatica has provided funded training through CFMT, specifically designed for newly appointed executives. This programme aims to:

- help participants adapt to their new roles;
- strengthening critical strategic skills, such as employee motivation, change adaptability, quick decision-making, and a long-term strategic vision.

Training courses for newly appointed Middle Managers

Lottomatica developed a programme designed specifically for newly appointed Middle Managers that focuses on developing managerial skills, with an emphasis on:

- horizontal and mid-level competencies, aligned with Lottomatica's three-level model (Foundational, Strategic, and Competitive/Advanced);
- the ability to perform effectively in one's role and to handle the relative responsibilities.

Cyberguru

Lottomatica launched an online platform available to all employees, providing comprehensive training on cybersecurity issues. The programme includes:

- training modules that raise awareness of cyber risks and enhance both personal and professional-organisational;
- flexible access to content and the possibility of tracking participants' progress through evaluation tests at the end of each module.

Training

Lottomatica has expanded its training offering to include a variety of courses, such as women's empowerment, sustainability, and inclusive leadership. In particular, the ESG programme was introduced to increase staff awareness of environmental, social, and governance issues, encouraging widespread participation.

Privacy and confidentiality

Lottomatica Group has implemented stringent measures to prevent and mitigate IT risks, as well as any loss of personal data or unauthorised access. These measures undergo constant monitoring and updating, in line with national and international best practices. Annual tests and assessments (including penetration tests, vulnerability assessments, IT infrastructure evaluations, and data protection policy reviews) are conducted to ensure the effectiveness of these measures against potential risks.

The Group's compliance framework and policies on privacy and personal data processing are continuously updated to meet stakeholder expectations, consumer needs, and evolving EU regulations on technology, data, and innovation. This commitment is demonstrated by the achievement of ISO 27701:2019 certification for personal data management and protection by two Group companies, GBO Italy S.p.A. and Gamenet S.p.A..

GRO WPMP

Launched in Serbia, this course is designed to help senior managers effectively communicate difficult or unpopular decisions. It aims to strengthen management skills, ensure the development of key competencies needed for business leadership, and support individual career growth.

Training programme on ESG (Environmental, Social, Governance) topics

Lottomatica launched a training programme to raise its employees' awareness of sustainability issues, consisting of 7 webinars and concise training modules. By offering content in both synchronous and asynchronous formats, the programme ensures broad accessibility and encourages widespread participation.

Customised training courses

Customised training sessions, identified through the MyEvaluation process, were also offered in 2024 to address specific gaps or enhance knowledge of certain topics/tools, such as soft skills, technical skills, administrative specialisations, and language proficiency.



Job stability – Fair Pay

In keeping with 2023, the Fair Pay project was implemented again in 2024 to guarantee all Lottomatica employees a minimum pay threshold. This initiative was prompted by the rising cost of living in recent years and the inadequacy of gross per capita disposable income to ensure a decent standard of living. In response, an initiative was introduced to ensure that remuneration remains aligned with economic trends, regardless of individual job performance.

Welfare & well-being

In 2024, the welfare plan was expanded with the introduction of “LianeCare”, a support platform designed to help employees achieve a better work-life balance. The platform places particular emphasis on post-maternity reintegration, family caregiving support, and psycho-educational courses.

World Health and Safety Day

Lottomatica Group is planning an information session on accident prevention on World Health and Safety Day in 2025.

Metrics and targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Disclosure
requirement
S1-5

Through specific actions to reduce the gender pay gap annually, the Group **aims to reduce the gender pay gap to zero by 2030**. Starting from a base value of -6.90% in 2022, the gap was reduced to -5% in 2023, excluding the management team. In 2024, the Group maintained its calculation methodology based on the relative position classes to measure the gender pay gap.

This approach, aligned with the **Mercer IPE international assessment system**, assigns different weights to different organisational roles based on qualitative and quantitative criteria. To ensure meaningful and consistent data analysis, Lottomatica has established groupings of homogeneous bands based on role and organisational weight. The **gender pay gap** is then calculated using these Bands and the Market Reference. Based on this approach, the gender pay gap is equal to **3.5%**.

Disclosure
requirement
S1-6

Characteristics of the undertaking's employees

The following section provides details on the **composition of the company's workforce**, including the total number of employees broken down by gender. It also specifies different types of employment contracts, distinguishing between permanent, fixed-term, and variable-hour employees, with the data further segmented by gender.

2024						
Employee type	u.m.	Women	Men	Other	Not disclosed	Total
Permanent employees		830	1,610	0	0	2,440
Fixed-term employees	No.	109	117	0	0	226
Variable-schedule employees		1	0	0	0	1
Total employees	No.	940	1,727	0	0	2,667

2024						
Employee type	u.m.	Women	Men	Other	Not disclosed	Total
Full-time employees	No.	819	1,675	0	0	2,494
Part-time employees		121	52	0	0	173
Total employees	No.	940	1,727	0	0	2,667

Employee type	u.m.	2024
Number of employees		2,667
Number of terminated employees	No.	382
Employee turnover rate ³⁴	%	14.32

The FTE (Full-Time Equivalent) is calculated by adjusting the working hours for part-time employees (for example: 1 employee is considered FTE 0.5 if they have a part-time contract with working hours equivalent to half of the total contracted hours); furthermore, the data shown are the result of the consolidation of Group data at the end of the reference period (31/12/2024).

Disclosure
requirement
S1-7

Characteristics of non-employee workers in the undertaking's own workforce

The information regarding the total number of non-employees within the company's workforce is provided below. The data shown correspond to the end of the reference period (31/12/2024) and include both self-employed individuals with direct contracts for the supply of labour and workers provided by staffing agencies specialising in recruitment and personnel placement.

Characteristics of non-employees	u.m.	2024
Self-employed workers non-employees		20
Workers provided by enterprises engaged in recruitment, selection, and personnel provision	No.	2
Total number of non-employees		22

34) 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.

Collective bargaining coverage and social dialogue

Disclosure
requirement
S1-8

Lottomatica actively monitors and communicates information on collective bargaining coverage and social dialogue, both of which are essential to ensuring fair and transparent working conditions. Specific data are provided on the percentage of employees covered by collective agreements and the proportion of employees represented by trade unions. These insights offer a clear view of employee participation in negotiation and social dialogue processes, fostering a more inclusive and engaged work environment.

The information regarding the **contractual coverage** of the company's employees in social dialogue within the company is provided below. In particular, the figures include the percentage of the workforce subject to collective agreements, offering a comprehensive overview of their prevalence within the organisation, and the total number of employees represented by trade unions.

Collective bargaining and social dialogue	u.m.	2024
Number of employees covered by collective bargaining agreements		2,253
Number of employees covered by trade unions	No.	2,193
Number of employees		2,667
Percentage of employees covered by collective agreements	%	84.48
Social dialogue coverage		82.23

There are no agreements in place for representation by a European Works Council (EWC), a European Company (SE) Works Council, or a European Cooperative Society (SCE) Works Council.

Coverage rate	Collective bargaining coverage		Social dialogue
	Employees – EEA (for countries with > 50 emp. representing > 10% of total employees)	Employees - non-EEA (estima- ted for regions with > 50 emp. representing > 10% of total employees)	Workplace representation (EEA only) (for countries with > 50 emp. representing > 10% of total employees)
0-19%	-	Serbia	-
20-39%	-	-	-
40-59%	-	-	-
60-79%	-	-	-
80-100%	Italy	-	Italy

Disclosure
requirement
S1-9

Diversity metrics

Lottomatica, aware of the importance of diversity as a distinctive factor for growth, has adopted a Diversity Policy and specific programs focused on enhancing diversity, first and foremost gender diversity, reinforcing the responsibilities of management and the monitoring of company performance in this area. In this regard, the Group monitors the composition of its workforce, paying particular attention to **gender diversity in senior management** and the **age distribution of employees**. With regard to the first metric, the company reports both the number and percentage of men and women in leadership positions, providing an overview of the degree of gender parity in senior functions. Specifically, by senior management the Group considered the Chief Executive Officer and his direct reports (first and second level). With reference to the distribution of employees by age bracket, on the other hand, Lottomatica divides its employees into three main groups in order to monitor the intergenerational balance present within the Group, also with a view to enhancing consolidated experience and skills as well as innovation and new perspectives brought by the younger generations.

Senior management gender diversity	u.m.	2024
Senior management employees		13
Of which women		5
Of which men	No.	8
Of which other		0
Of which not disclosed		0
Percentage of women in senior management		38.46
Percentage of men in senior management	%	61.54

2024					
Distribution of employees by age group	u.m.	< 30 years	30-50 years	> 50 years	Total
Managers	No.	0	29	30	59
Middle Managers		2	144	83	229
White collar workers		236	1,405	345	1,986
Blue collar workers		81	216	96	393
Total employees		319	1,794	554	2,667
Managers	%	0	1.09	1.12	2.21
Middle Managers		0.07	5.40	3.11	8.59
White collar workers		8.85	52.68	12.94	74.47
Blue collar workers		3.04	8.10	3.60	14.74
Total employees		11.96	67.27	20.77	100.00

Disclosure
requirement
S1-10

Fair remuneration

All Group's employees receive an adequate salary, in line with the applicable reference parameters, namely the minimum wage levels defined by the National Collective Bargaining Agreements (CCNL). It should be noted that Lottomatica adopts several CCNLs with specific minimum wage levels, and guarantees that all its employees receive a salary higher than the minimum set by the reference CCNL for their position. Specifically, the appropriate salary is €19,580, which corresponds



to the average minimum wage of the CCNLs adopted by the Group. The lowest wage, on the other hand, which still respects the contractual minimum, is €16,171.

Wages	u.m.	2024
Lowest wage	€	16,171
Adjusted wage ³⁵		19,580
Ratio		0.83

Social protection

Disclosure
requirement
S1-11

Lottomatica aims to provide support to its employees during some of the most important moments in their private lives, and therefore all **employees are covered by social protection against loss of income** due to illness, unemployment, occupational injury and acquired disability, parental leave and retirement.

Persons with disabilities

Disclosure
requirement
S1-12

The Group recognises **equal opportunities for all its people** regardless of sensory, cognitive or motor disabilities, committing itself to creating accessible workplaces and implementing concrete measures aimed at promoting the integration and inclusion of people with disabilities, making the most of their talents and skills, thus contributing to the removal of cultural, sensory and physical barriers.

Persons with disabilities	u.m.	2024
Number of employees with disabilities		92
<i>Of which women</i>		48
<i>Of which men</i>	No.	44
<i>Of which other</i>		0
<i>Of which not disclosed</i>		0
Percentage of employees with disabilities		3.45
<i>Of which women</i>		1.80
<i>Of which men</i>	%	1.65
<i>Of which other</i>		0
<i>Of which not disclosed</i>		0

Training and skills development metrics

Disclosure
requirement
S1-13

Professional development is a crucial aspect of the Group's competitiveness, essential not only for attracting and retaining top talent, but also for fostering skill development and structured career growth. In this regard, the Group has adopted **periodic review systems** considering both employees who have participated in the performance review process and employees whose remuneration is subject to an individual objective assessment.

35) The adjusted wage was calculated as the average of the contractual minimums in the company.

Periodic reviews of employee performance and career development by gender	2024					
	u.m.	Women	Men	Other	Not disclosed	Total
Employees who participated in the periodic reviews	No.	646	1,299	0	0	1,945
Periodic reviews		1	1	1	1	4
Employees		940	1,727	0	0	2,667
Periodic reviews conducted per employee		0	0	0	0	0
Employees who participated in the periodic reviews	%	68.72	75.22	0	0	72.93

		2024				
Periodic reviews of employee performance and career development by category	u.m.	Managers	Middle Managers	White collar workers	Blue collar workers	Total
Employees who participated in the periodic reviews	No.	59	189	1,544	153	1,945
Performance reviews		1	1	1	1	4
Total employees		59	229	1,986	393	2,667
Periodic reviews conducted per employee		0.02	0	0	0	0
Employees who participated in the periodic reviews	%	100	82.53	77.74	38.93	72.93

Periodic reviews of the performance and career development of non-employees		u.m.	Non-employee workers
Number of non-employees who participated in the reviews			2
Number of performance reviews	No.		1
Total non-employee workers			22
Percentage of non-employees who participated in the reviews		%	9.09

Moreover, Lottomatica considers people **training** and the **development of highly qualified and specialised profiles important strategic keys to success** and invests decisively and constantly on these aspects, supporting employees in their personal and professional growth. Specifically, in 2024 a total of 30,474 hours of training were provided, with an average of 11.43 hours per employee, highlighting the Group's commitment to guaranteeing opportunities for the development and improvement of skills equally among employees.

Employees training hours		2024	
		u.m.	Average training hours
Women	No.	14,154.62	15.06
Men		16,319.70	9.45
Other		0.00	0.00
Not disclosed		0.00	0.00
Total		30,474.32	11.43



Health and safety metrics

Disclosure
requirement
S1-14

Lottomatica is committed to creating a safe working environment, guaranteeing the adoption of all prevention and protection measures necessary to avoid, or at least reduce to a minimum, 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 the **protection of health and safety** 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. With this in mind, during 2024 internal audits and third-party audits were carried out with reference to the Occupational Health and Safety Management System in order to maintain ISO 45001 for the 3 Group companies already certified and to obtain certification for 4 new companies.

Health and safety	u.m.	2024		Total
		Employees	Non-employees	
Workers covered by the health and safety management system, as required by law and/or recognised standards or guidelines		100	100	100
Workers covered by the health and safety management system according to legal requirements and/or recognised standards or guidelines and which has been object of internal audit and/or audit or certification by an external party ³⁶	%	47.32	N.D.	47.32
Deaths due to work-related injuries and illnesses		0	0	0
Recordable workplace accidents	No.	15	0	15
Hours worked		3,409,127.26	27,413.14	3,436,540.40
Rate of recordable workplace accidents	%	4.40	0.00	4.36
Cases of work-related illnesses detected during the reporting period among those who were formerly part of the workforce		0	0	0
Cases involving recordable work-related diseases	No.	0	0	0
Days lost due to work-related injuries and deaths		0	0	0

Work-life balance metrics

Disclosure
requirement
S1-15

All Group employees are entitled **to family leave**.

Family leave	u.m.	2024				Total
		Women	Men	Other	Not disclosed	
Number of employees entitled to family leave		940	1,727	0	0	2,667
Number of eligible employees who took family leave	No.	99	125	0	0	224
Percentage of employees entitled to family leave		100	100	0	0	100
Percentage of eligible employees who took family leave	%	10.5	7.2	0	0	8.4

36) This percentage refers only to employees of ISO 45001 certified companies.

Disclosure
requirement
S1-16

Remuneration metrics (pay gap and total remuneration)

The gender pay gap is determined by the Group on the basis of the average gross hourly remuneration for male and female employees, according to the methodology defined by the standard.³⁷

	u.m.	Average gross hourly remuneration
Gender pay gap	%	13
	u.m.	Complementary or variable components
Ratio of the total annual remuneration of the highest-paid individual to the median total annual remuneration of all other employees	-	60.04

Moreover, also in 2024, the Group maintained its calculation methodology based on position classes to measure the gender pay gap. This approach, aligned with the Mercer IPE international assessment system, assigns different weights to different organisational roles based on qualitative and quantitative criteria. To ensure meaningful and consistent data analysis, Lottomatica has established groupings of homogeneous bands based on role and organisational weight. The gender pay gap is then calculated using these Bands and the Market Reference. Based on this approach, the gender pay gap was equal to 3.5% at 31/12/2024. The wages of employees in countries other than Italy were multiplied by the ratio of the purchasing power index in Italy (62.8) to the purchasing power index in the reference country (Serbia 39.57; Malta 58.29; Austria 84.43).³⁸

Disclosure
requirement
S1-17

Identified cases of severe human rights issues, incidents, and impacts

During the reporting period, **there were no incidents of discrimination**³⁹ and **serious human rights incidents**,⁴⁰ nor were there any complaints through ad hoc channels and national contact points, and therefore no fines, sanctions and compensation resulting from incidents and complaints in these areas.

3.2 Workers in the value chain [ESRS S2]

Lottomatica Group views the **protection** and **empowerment** of workers throughout the value chain as a strategic priority for creating sustainable value, and remains committed to ensuring **fair, safe, and inclusive working conditions**. The Group actively promotes the well-being of its employees and collaborators, fostering positive behaviours throughout the value chain and supporting personal and professional growth for all stakeholders involved. Below is a list of IROs identified as material from the double materiality analysis, which the Group is committed to managing through

37)As indicated by ESRS S1, the gender pay gap is calculated as follows: (average gross hourly earnings of male employees – average gross hourly earnings of female employees) / average gross hourly earnings of male employees x 100. In order to calculate the pay gap, all the employees' total remuneration were taken into consideration, including the CEO and key management personnel. In addition, Lottomatica calculates the ratio of the CEO's total remuneration to the median annual total remuneration of all employees.
38) Sources: Eurostat, Cost of Living, Ranking by Country 21/12/2024.
39) It is specified that the following forms of discrimination, among others, were considered: gender, race or ethnic origin, age, sexual orientation, harassment.
40) It is specified that the following cases were considered: non-compliance with the UN Guiding Principles on Business and Human Rights; non-compliance with the ILO Declaration on Fundamental Principles and Rights at Work; non-compliance with the OECD Guidelines for Multinational Enterprises.



targeted policies and concrete actions. These efforts aim to protect workers' rights, ensure a safe and inclusive working environment, and promote skills development, thereby contributing to a fair and sustainable professional ecosystem.

ESRS S2 – WORKERS IN THE VALUE CHAIN

ESRS (SUB-TOPIC)	IRO	DESCRIPTION	POSITIVE / NEGATIVE ACTUAL / POTENTIAL	TIME HORIZON	VALUE CHAIN
Working conditions	I	Heightened awareness of occupational health and safety issues among workers in the value chain	Positive Potential	Medium term Long term	Upstream Downstream
	I	Accidents at the workplace of suppliers, logistics sites, and points of sale	Negative Actual	Short term Medium term Long term	Upstream Downstream
Equal treatment and opportunities for all	I	Expansion and updating of the skills of the workers in the production chain	Positive Potential	Medium term Long term	Upstream Downstream
Other work-related rights	I	Human rights violations along the value chain	Negative Potential	Medium term Long term	Upstream Downstream
	I	Cyber attacks and/or information theft along the value chain	Negative Potential	Medium term Long term	Upstream Downstream

Strategy

Material impacts, risks and opportunities and their interaction with the strategy and business model

Disclosure requirement related to ESRS 2 SBM-3

Lottomatica Group's ESRS 2 disclosure includes all employees in the value chain who may be materially impacted by the various Group companies, including those directly connected to its operations and value chain through products, services, or business relationships. In particular, the main types of workers included in the analysis are: workers who work at the company's premises but are not part of the company's own workforce; workers who work for entities in the upstream and downstream value chain.

Moreover, based on the analyses conducted, the **Group has not identified any geographical area or product associated with a significant risk of child, forced, or compulsory labour** in the value chain, and no negative impacts have been observed as a result of the transition to greener operations. Finally, Lottomatica Group's commitment to generating positive business impacts extends to companies and workers in the value chain through skill development and health and safety training.

Management of impacts, risks and opportunities

Disclosure
requirement
S2-1

Policies related to value chain workers

The Group is highly committed to the protection of human rights and workers in the value chain, and has adopted **several policies**⁴¹ in this area, including a Code of Ethics and Code of Supplier Conduct, all of which are available on the company website in order to ensure their broadest possible dissemination.

With regard to the Group's **human rights commitments**, these are outlined in the Code of Ethics, the Corporate policy for the protection and preservation of human rights, and the Supplier Code of Conduct. These documents describe the approach adopted by the Group to ensure the protection of the human and labour rights of the individuals within its value chain, including its own workers, suppliers and partners, with explicit reference being made to forced and child labour. Lottomatica also strives to maintain **relationships open to collaboration and dialogue** with the players in its own value chain. With regard to the Group's suppliers, for example, the evaluation process adopted by the Group in 2024 provides for a specific feedback and discussion phase with the subjects being evaluated, in order to share plans for possible future improvements. Moreover, Lottomatica strives to maintain **transparent relationships based on dialogue** with its network of business partners and points of sale throughout the country, with the aim of sharing knowledge, intercepting consumers' needs, and always guaranteeing their maximum protection and safety. Finally, the Group takes concrete measures to prevent and remedy human rights impacts through an integrated governance and control system, which includes the implementation of procedures for the periodic identification and assessment of risks both inside and outside the Group, in order to proactively identify any critical issues. In the event of violations, the Company provides a dedicated reporting system, which is also accessible to all workers employed by entities that provide goods or services or carry out works for Group companies.

During 2024, there were no reported cases of workers within the value chain failing to comply with international principles, standards or guidelines, including those issued by the United Nations, the International Labour Organisation (ILO), and the OECD.

Disclosure
requirement
S2-2

Processes for engaging with value chain workers about impacts

Lottomatica Group takes into account the perspectives of the actors in its value chain when managing material impacts that affect it. Resources that collaborate by working for entities that provide goods or services or carry out works for Group companies are among the recipients of the reporting procedure. For the purposes of the annual assessment of the Group's impacts, the **main players in Lottomatica Group's value chain were engaged**. In particular, as part of the 2024 double relevance analysis, an interactive questionnaire was administered to **representatives of about 40 companies** (including providers of hardware and software technology solutions, and logistics, maintenance, horeca, and utility companies), and **about 300 points of sale**, giving them the opportunity to assess a series of ESG impacts related to Lottomatica Group's activities, some of which explicitly referred to the value chain. For the purposes of assessing the Group's impacts for 2024, responsibility for engagement was assigned to the Corporate Sustainability function, with the

41) For more details on the policies adopted by the Group in the area of workers in the value chain, please refer to the section "Summary of Policies" in the chapter "General Information".



support of the corporate functions that interact most directly with the upstream and downstream stakeholders in the value chain. Although it does not have any global framework agreements, Policy for the protection and preservation of human rights adopted by Lottomatica also expressly applies to all subjects in the Group's value chain. Moreover, the promotion of human rights is expressly referred to in the Code of Ethics and the Supplier Code of Conduct, which all companies and partners having business relations with Lottomatica Group are required to accept. Finally, in 2024 Lottomatica adopted a "Vendor rating" procedure, with the aim of regulating the process of evaluating its suppliers and monitoring their technical, organisational and managerial capacities, as well as their adherence to the Group's expectations in terms of quality standards, reliability and performance. The suppliers evaluated receive specific feedback regarding their own performance and possible improvement plans and, in the spirit of cooperation and dialogue, are given the opportunity to provide their own views and observations.

The measures adopted to gain a better understanding of the workers' views, particularly in relation to violations and wrongdoing, include **dedicated reporting channels**, which are laid out in the procedure for the management of whistleblower reports. It should be noted that, although Lottomatica did not adopt a specific general process to engage with workers in the value chain, it nevertheless collected and disclosed the required information.

Processes for engaging about negative impacts and channels for value chain workers to raise concerns

Disclosure
requirement
S2-3

Whenever it becomes aware of significant negative impacts on workers in the value chain, Lottomatica Group follows a procedure that provides for the timely identification of the problem, the analysis of its possible causes, and the adoption of the necessary corrective measures. In keeping with the contents of the 231 Model, and in compliance with the regulatory provisions, Lottomatica Group has established a system for the management of whistleblower reports, governed by a specific procedure, whose recipients also include providers of goods and services, and those who perform works for Group companies. Published on the corporate website, and applicable to all Group companies, this procedure encourages the parties involved to promptly report, in good faith and based on reasonable facts, any potential violations of, or conduct or practices that are not compliant with, the laws applicable to the Group and/or the indications contained in the Code of Ethics, the 231 Model, and/or the applicable internal procedures and guidelines.⁴²

Lottomatica Group also promotes communication and educational activities directed towards its human resources to ensure the broadest possible knowledge and most effective application of the procedure for the management of whistleblower reports and the relative reporting channels. It does so by illustrating the rules on whistleblowing, the functioning of and access to the channels and tools made available for submitting reports, and the disciplinary system in place to handle any violations.

The existence of a procedure and dedicated channels for submitting reports is also made explicit in the Supplier Code of Conduct, which all companies and partners having business relations with Lottomatica Group are required to accept, undertaking to ensure that their employees, representatives and subcontractors fully understand and comply with the Code of Conduct.

⁴² For more details on the whistleblowing system, please refer to the section "Channels for own workers and workers' representatives to raise concerns" - ESRS S1 S1-3 reporting obligation' in the chapter 'Own workforce [ESRS S1]'.

Disclosure
requirement
S2-4

Taking action on material impacts on value chain workers and approaches to mitigating material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions

In order to increase the positive effects that can be generated by broadening and updating the skills of workers in the production chain, in 2024 the Group continued with several **initiatives focused on training**, with particular regard to responsible gaming, which include courses on responsible gaming, whose participation rate by the sales network is periodically monitored. Other initiatives include legislative and regulatory updates and provisions against money laundering, for which participation is an explicit contractual obligation.

- **Training for betting outlets and indirectly operated VLT gaming halls:** in 2023, in collaboration with the “Integrated Psychiatric Centre for Research, Treatment and Prevention of Addictions” (CePID), which arose from the partnership between Agostino Gemelli University Polyclinic Foundation IRCCS and the Lottomatica Foundation, the Group launched a structured training and awareness programme on responsible gaming for its betting network, its directly managed network, and its indirectly operated VLT sales network. In 2024, this training continued, particularly targeting new points of sale, and was included in the contractual commitments. In 2023, the programme involved more than 80% of the indirectly operated and betting halls, in addition to 100% of the directly operated gaming halls. In 2024, the training reached 100% of the direct network, covering 70% of new openings on the betting network and among indirectly operated VLT gaming halls.
- **Responsible gaming section on websites for Betting and Gaming machine managers:** in 2024, the Group created a specific section dedicated to responsible gaming on the websites for betting and gaming machine network operators and retailers, with training, information and regulatory material to be downloaded and made available at the points of sale.

Main actions	Field of application	Time horizons
Training for betting outlets and indirectly operated VLT gaming halls	Indirectly operated network, betting network and directly operated network	Each year
Responsible gaming section on websites for Betting and gaming machine managers	Indirectly operated network and betting network	2024

Action	Type of financial resources	CapEx (€)	OpEx (€)	Link with financial statement items	Future financial resources (€)
Training for betting outlets and indirectly operated VLT gaming halls	Provision of Services	-	3,050	Costs for services-other	3,050
Responsible gaming section on websites for Betting and gaming machine managers	Internal development	n/a	n/a	n/a	n/a



With regard to the negative impacts generated throughout the value chain's workforce, the Group has taken the following **measures**:

- with regard to the impact of the "Violation of human rights along the value chain", and with particular reference to child and forced labour, in addition to the commitment expressed in the aforementioned Code of Ethics and Policy for the protection and preservation of human rights, in 2022 the Group adopted a specific Supplier Code of Conduct, which prohibits all companies doing business with Lottomatica Group from relying on child or forced labour, and commits them to opposing any form of discrimination and to guaranteeing fair and favourable working conditions;
- with regard to the impact of "Cyber attacks and/or theft of information along the value chain", the commercial contracts entered into by the Group include specific confidentiality obligations and security measures to ensure the protection of the individuals, information systems and/or operational processes used for the processing of personal data. These obligations are reinforced by the provisions of the aforementioned Supplier Code of Conduct, which, in addition to requiring suppliers to ensure the protection of all sensitive information, also requires them to adopt appropriate security systems and mechanisms for all information subject to electronic transfer, and to notify Lottomatica of any data breaches, whether presumed or real;
- with regard to the impact of "Accidents at the workplace of suppliers, logistics sites and points of sale," the aforementioned Supplier Code of Conduct includes specific commitments to protect the health and safety of workers. Suppliers must ensure safe, suitable and hygienic working facilities and resources for their employees, adopt effective health, safety prevention and remediation policies and procedures, and provide their employees, suppliers and subcontractors with the protective equipment and training necessary to carry out their duties in complete safety.

About the positive impact of "Heightened awareness of occupational health and safety issues among workers in the value chain," the aforementioned Supplier Code of Conduct provides for specific commitments, which include providing employees, suppliers and subcontractors with the protective equipment and training necessary to carry out their duties in complete safety.

Whenever it becomes aware of significant negative impacts on workers in the value chain, Lottomatica Group follows a procedure that provides for the timely identification of the problem, the analysis of its possible causes, and the adoption of the necessary corrective measures. No serious human rights issues or incidents related to its upstream and downstream value chain were brought to the Group's attention in 2024. It should also be noted that the double materiality analysis carried out in 2024 did not identify any relevant risks and/or opportunities for the Company with regard to workers in the value chain.

In addition to constantly maintaining transparent and dialogue-based relations with its partners and suppliers, the Group also diligently updates its Code of Conduct and the requirements contained in its contracts and commercial agreements, and intervenes to reinforce specific obligations or introduce new commitments wherever necessary, as was the case, for example, with the requirement for shop managers and their employees to participate in training sessions on responsible gaming. The management of issues concerning the value chain and the people who are part of it is broken down by competence among several functions and departments, which, for example, include the Procurement & Shared Services structure with regard to the management of the company's supplier list and procurement process, and the specific business structures for the management of relations with the sales network of business partners and points of sale throughout the country.

Metrics and targets

Disclosure
requirement
S2-5

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The Group is committed to preventing the violation of workers' rights and human rights along the entire value chain, and, to this end, in addition to having implemented the training and information activities described in the preceding paragraphs, it has also adopted procedures for the periodic identification and assessment of risks both inside and outside the Group, a system for reporting violations, a disciplinary system, and dialogue activities with stakeholders. In this sense, Lottomatica has not identified specific metrics and defined quantitative targets, also in light of the fact that no relevant risks and/or opportunities have been identified with regard to workers in the value chain, nor have any reports of human rights violations been brought to the Group's attention. However, the level of awareness remains high, and the issue of workers' rights remains a core aspect of many of Lottomatica's policies, as described in chapters S1 and S2.

3.3 Consumers and end-users [ESRS S4]

The Group considers the **protection of consumers** and **end-users** a **strategic priority** for sustainable value creation, and continuously strives to **ensure a responsible, safe, and transparent gaming experience** while fostering positive behaviours along the value chain. Below is a list of IROs identified as material from the double materiality analysis, which the Group is committed to managing through targeted policies and concrete actions. These initiatives aim to safeguard consumer rights, uphold high standards of safety and transparency, and promote a responsible approach to entertainment.



ESRS S4 – CONSUMERS AND END USERS

ESRS (SUB-TOPIC)	IRO	DESCRIPTION	POSITIVE / NEGATIVE ACTUAL / POTENTIAL	TIME HORIZON	VALUE CHAIN
Information related impacts for consumers and/or end-users	I	Cyber attacks and/or theft of consumer information	Negative Potential	Medium term Long term	Downstream
	R	Incorrect/lack of management of logical access constraints		Short term Medium term	Own operations
	R	Untimely, incomplete and/or incorrect implementation of the established security policies and specifications		Short term	Own operations
	R	Failure to identify actions to prevent cyber attacks or theft of information and data		Short term Medium term	Own operations
	R	Inadequate establishment, implementation, review, maintenance or improvement of the Information Security Management System (ISMS) within the context of the implementation and management of information systems and services related to the legally required retention activities		Short term Medium term	Own operations
	R	Inadequate data management, in terms of: confidentiality, integrity and availability		Short term Medium term	Own operations
Personal safety of consumers and/or end users	I	Presence of cases of gambling disorder in the areas where the Group operates	Negative Actual	Short term Medium term Long term	Downstream
Social inclusion of consumers and/or end-users	R	Lack of ability to ensure the reliability and availability of ICT systems and critical computer programmes, with negative effects on operations in terms of malfunctions / disruptions / delays in IT systems, which in turn could affect the performance of the different businesses		Short term Medium term	Own operations
	R	Lack of Software Factory flows and processes, useful for aligning business objectives with the evolution of IT systems		Short term Medium term	Own operations
	R	Inadequate management of installation, replacement, maintenance, and decommissioning activities related to the technological infrastructures present at the network's points of sale (e.g. PoS, Gaming Machines, Terminals)		Short term Medium term	Own operations
	I	Adoption of responsible business and consumer protection practices	Positive Actual	Short term Medium term Long term	Downstream
	O	The provision of a secure gaming environment and legal channels can help attract some of the gaming demand that would otherwise turn to illegal gaming, resulting in improvements in the Group's financial performance		Short term Medium term Long term	Own operations Downstream





Strategy

Material impacts, risks and opportunities and their interaction with the strategy and business model

Disclosure
requirement related
to ESRS 2 SBM-3

Lottomatica Group's ESRS 2 disclosure includes all consumers and/or end users who may be materially impacted by the various Group companies, including those directly connected to its operations and value chain through products, services, or business relationships. The operation and management of public games with cash winnings are strictly intended for adult individuals, in compliance with sector regulations, as the state holds exclusive authority over this matter in our Country. One of the key impacts associated with gambling activities involving cash winnings is **gambling disorder**, which was incorporated into the Essential Levels of Care (*Livelli Essenziali di Assistenza*, or LEA) in March of 2017. This classification ensures that related services provided by the National Health Service (SSN) are available to all citizens, either free of charge or with a co-payment, regardless of their place of residence. Fully aware of the risks associated with gaming activities, the Lottomatica Group companies are committed to preventing excessive gaming through a **comprehensive Responsible Gaming programme**. This initiative also enforces a **strict prohibition on minors accessing gaming services**, in full compliance with the national and European data protection regulations. To further support responsible gaming, the Group provides clear and accessible information on all available gaming products. This is achieved through dedicated sections on gaming websites and physical notice boards located in agencies and gaming halls across the country. These materials include detailed gaming regulations, information on odds, support resources for at-risk players, and awareness campaigns aimed at educating the public on gambling disorder and its associated risks. The most significant potential negative impacts of gaming operations with cash winnings primarily concern data security and privacy, as well as problem gaming and gambling disorder. To address the latter, all employees who interact directly with end users receive **specialised training** to manage such situations appropriately. This training is conducted in collaboration with leading institutions such as the Integrated Psychiatric Centre for Research, Treatment and Prevention of Addictions (CePID) at the A. Gemelli IRCCS University Hospital in Rome, and internationally recognised organisations like Gambling Therapy. The legalization of public gaming with cash winnings, through the granting of concessions to private entities, represents one of the main positive impacts of the Group's operations. By offering a **safe and regulated** gaming environment, the Group provides consumers with a secure and controlled alternative to illegal gambling, which remains prevalent in certain regions of Italy. From a commercial perspective, the key risk lies in the potential for consumer addiction and the development of gambling disorder. The primary commercial opportunities, on the other hand, stem from the availability of legal gaming as a safer alternative to unauthorised gambling channels.

In 2024, in collaboration with the Integrated Psychiatric Centre for Research, Treatment and Prevention of Addictions (CePID) at the A. Gemelli IRCCS University Hospital in Rome, Lottomatica Group implemented a **data analysis methodology** to identify 13 Observed Behaviour Indicators (ICOs) divided in primary and secondary. These include but are not limited to: playing times, amounts wagered, and amounts withdrawn, which help to accurately identify high-intensity players within the online customer base, enabling measures to minimise their risk of excessive gaming exposure. Similarly, in establishments within the so-called direct network, Lottomatica Group has developed **proprietary software** designed to monitor gaming behaviour in gaming halls. This system operates through a monthly form, completed by the hall manager, who receives specialised training. (so-called "Sistema Gioco Intelligente").

Management of impacts, risks and opportunities

Disclosure
requirement
S4-1

Policies related to consumers and end-users

Lottomatica Group places consumer and end-user protection at the heart of its strategy, and is committed to effectively managing the impacts, risks, and opportunities associated with the customer experience. To uphold **high standards of protection and transparency**, the Group has implemented various **policies**⁴³ and a Code of Ethics, which are available on the corporate website to ensure widespread accessibility. Consumer protection is part of Lottomatica's broader commitment to the well-being of its employees, collaborators, and the communities in which it operates. The Group upholds and promotes human rights, personal empowerment, and diversity, aligning its approach with the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles at Work, and the 2030 Agenda for Sustainable Development, while also adhering to the UN Global Compact. Within this context, the Group companies strictly adhere to the human rights policy, ensuring the protection of customer privacy and personal information, in full compliance with the current regulations. These principles are further reinforced by a strong commitment to **consumer protection and the promotion of a safe and responsible gaming experience**. In order to maintain a constant dialogue with its users, Lottomatica has established dedicated communication and feedback channels. In particular, for the online platform, customer satisfaction surveys are conducted periodically to enhance the range of products and services, while a dedicated contact centre is always available to provide assistance. Within the direct network, on the other hand, consumers can report issues via a dedicated email address, while the hall manager serves as the primary liaison between the company and customers, addressing their concerns.

To promote a safe and responsible gaming experience, the Group has developed a comprehensive **Responsible Gaming Programme** based on **three key principles**:

- **protection of minors**, through stringent measures preventing under-age access to gaming;
- **prevention of excessive gaming**, through training, monitoring tools, and support for problem players;
- **promotion of a responsible gaming model** centred on transparency, awareness, and comprehensive information.

This programme is integrated into all business activities and is structured into four main areas:

1. training and awareness initiatives for internal staff on responsible gaming;
2. information and support for players, including awareness campaigns on gaming-related risks;
3. preventing and mitigating the impacts of inappropriate gaming behaviour;
4. research and development efforts to enhance responsible gaming practices.

A core component of the programme is **training**, which includes mandatory courses for all employees and advanced training for staff in contact with customers to better address the needs of vulnerable consumers and implement targeted interventions. The points of sale also receive specialised training to equip them with the knowledge necessary to support their customers effectively. Finally, in order to safeguard user data and ensure a **high level of security**, the Group has implemented an **advanced technological infrastructure** that guarantees **business continuity** and stringent **information protection** measures.

43) For more details on the policies adopted by the Group concerning consumers and end users, please refer to the "Summary of Policies" section in the "General Information" chapter.



Processes for engaging with consumers and end-users about impacts

Disclosure
requirement
S4-2

Through its specific Customer Relations Management (CRM) function, active in the remote gaming channel, Lottomatica Group strives to engage with its consumers directly, in order to **collect suggestions and indications** to better guide its strategic decisions. In addition, the Group's remote gaming companies have monitoring systems in place to measure the **use of self-limitation and self-exclusion tools** and **problem gaming propensity tests**. For physical gaming, in directly operated gaming halls, such as those within the Big Easy perimeter, the gaming hall managers and operators have a **proprietary software** at their disposal **to monitor and identify any situations at risk of problem gaming**, the **findings** of which are **shared** on a monthly basis by the Responsible Gaming Operations Committee. The Group directly engages with consumers at least every six months, through the CRM and Contact Centre. Operational responsibility for ensuring consumer engagement lies with the dedicated function, which coordinates the operational management Committee responsible for analysing the results and planning the subsequent activities within the annual plans. The Group companies also evaluate the quality of the responsible gaming actions and projects by submitting them for the external G4 and WLA certifications. When issuing certificates, the international certification Bodies also provide audit reports highlighting any areas for improvement, which the Group then implements accordingly with appropriate supplementary activity plans.

In 2025, the Group intends to further strengthen the end-consumer engagement process by carrying out additional specific surveys on responsible gaming issues, targeting its customer base (online players, and physical gaming hall managers and operators).

Processes for engaging about negative impacts and channels for consumers and end-users to raise concerns

Disclosure
requirement
S4-3

Lottomatica Group actively promotes the analysis and research of legal and responsible gaming issues, creating opportunities for in-depth investigation and discussion on the role that the legal gaming industry specifically plays with regard to ensuring public order and legality, and consumer protection. This includes **collaboration** with the Integrated Psychiatric Centre for Research, Treatment and Prevention of Addictions (**CePID**) at the A. Gemelli IRCCS University Hospital, which contributes to the analysis of the phenomenon through specific scientific activities. Lottomatica also cooperates with **leading universities and research centres** – such as Milan Polytechnic University – in order to come up with solutions to remedy, or help remedy, cases of problem or pathological gaming. Among all of its physical and online channels, Lottomatica Group also promotes the National **toll-free number for gambling-related issues** (TVNGA): this free and anonymous service is managed by the Istituto Superiore di Sanità, and is not only intended for gamblers who wish to get in touch with industry professionals to get help, but is also open to those seeking information on health services dedicated to the treatment of gaming-related problems, or services for managing socio-economic and/or legal issues related to debt. **References to the regional SERDs and ASLs** are also posted at the points of sale, so that players suffering from problem gaming reach out to the specialised centres available throughout the territory. The availability of these channels is ensured through various instruments such as: physical information campaigns, online information campaigns, DEM campaigns for online consumers, and Telegram campaigns for the betting network. These communication tools are aimed at end consumers, as well as gaming halls and points of sale, and can be accessed

anonymously. In this regard, the Group has adopted specific service levels, in accordance with the provisions of the ADM service charter contained within the license agreements, in order to guarantee the timely monitoring of the issues raised and addressed, as well as the verification of the channels' effectiveness, even through the engagement of its consumers and the international certification bodies.

Information on these channels' availability is **clearly visible** in both the physical gaming areas and on the remote channels. The company also created a new logo dedicated to Responsible Gaming in 2024 which replaced the logos previously used for the Group's various brands, and that can be found on all materials referring to the pages of the gaming sites laying out all the tools available. The gaming halls and points of sale receive regular training and information on responsible gaming issues, enabling them to assist their consumers and support them with the available tools. There is no need to put in place policies to protect people against retaliation as the communication channels related to problem and pathological gaming guarantee complete anonymity.

Disclosure
requirement
S4-4

Taking action on material impacts on consumers and end-users, approaches to mitigating material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions

In order to mitigate the negative effects related to cyber-attacks and gambling disorder, increase the positive effects generated by the adoption of responsible business and consumer protection practices, and manage related risks and opportunities, in 2024 the Group pursued and launched **several initiatives focused on training, interactive self-assessment testing technologies, and obtaining certifications:**

- **The "Safe Plai" System:** Through the creation of the "Safe Plai" system for the segmentation of its online customer base, the Group is able to measure gaming behaviour and predict intensive gaming activities by online players, in compliance with GDPR requirements and in line with its policy of awareness, transparency and responsibility. The system was deployed on the Lottomatica computer systems at the end of the third quarter of 2024, and the necessary data processing and fine-tuning were initiated thereafter.
- **The Corporate Responsible Gaming Campaign:** During the course of the year, the Group conducted a corporate campaign on responsible gaming titled "Don't Play If", aimed at raising awareness of the risks associated with gaming addiction. The campaign was developed with the scientific collaboration of CePID, and reached all the online gaming platforms, betting rooms, and directly and indirectly operated VLT rooms, with a coverage of over 4,000 points of sale. A dedicated QR code was also placed on the campaign materials to provide easy access to the self-assessment test, in order to make it more widely known.
- **First level training of employees and the direct network:** The Group has initiated a comprehensive training and awareness-raising programme on responsible gaming for its employees, in cooperation with CePID. In particular, since December of 2024, responsible gaming has been included as a topic of in-depth study during the onboarding of new employees, and training on the subject has been added to the contractual commitments signed by both the betting network and the indirectly operated network. The first level responsible gaming training course has been accessible to 100% of the corporate population since 2023. Starting in 2023, the Group also ensured full coverage of 100% of its directly managed gaming halls, and has extended training to over 70% of the betting rooms and the indirect VLT network, continuing this initiative into 2024.



- **Second level training for employees in contact with customers:** For personnel in direct contact with customers, the Group has added specific second-level training, available via e-learning and in-person, with specific modules. In this regard, 100% of the Customer Support, Digital Operations, CRM and VipTeam took part in the training in 2024.
- **Dedicated responsible gaming section on the corporate intranet:** For 2025, Lottomatica has committed to creating a section dedicated to responsible gaming on the corporate intranet, which will be divided into four areas: training, certifications, information, and telephone support references.
- **Responsible gaming functionality on online gaming accounts:** In 2024, the Group introduced a new interactive self-assessment test on responsible gaming, and developed a dashboard that provides concise insights into gaming activity, including deposit amounts and set limits, in order to enhance players' awareness of their gaming behaviour.
- **G4 Certification (Online and Retail):** Most of the Group's online gaming platforms hold G4 (Global Gambling Guidance Group) certification, which attests to the existence and effective adoption of tools, policies and procedures aimed at ensuring the highest level of security and protection for both customers and employees. This certification was also extended to the directly managed retail network in 2024.
- **WLA Certification (Online and Retail):** Lottomatica has implemented sophisticated standards in line with the principles of responsible gaming and, through its subsidiary GBO Italy, has obtained WLA certification (first and second level), which underscores the Group's commitment to implementing security and promoting safe, legal, and conscientious gaming.
- **ISO 27001 Certification:** Lottomatica Group has adopted an Information Security Management System (ISMS) compliant with the international ISO/IEC 27001:2013 standard.
- **Milan Polytechnic University:** During the year, the Group launched a research project with the Milan Polytechnic on technological solutions to support sustainable development of business.

These actions are identified by the Responsible Gaming Operational Committee that prepares the activity plan, proposing projects based on feedback obtained from relevant stakeholders (customers, regulators, venue managers, etc.). The plan is then shared with the ESG advisory board and approved by the CEO, and is communicated to the Board of Directors. The Operational Committee also monitors and evaluates the initiatives and, meeting monthly, ensures the continuous improvement of the Responsible Gaming Programme and the achievement of the expected results. The same Committee is also in charge of monitoring and assessing the effectiveness of the actions and initiatives relating to the adoption of responsible business practices to safeguard consumers, as defined by the Responsible Marketing Policy, and identifying all new projects and initiatives aimed at ensuring the constant pursuit of responsible gaming. In carrying out Responsible Gaming activities, Lottomatica Group provides for specific intervention protocols by its sales network, as well as by 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 activities (physical timers made available within the direct network of gaming halls and self-limitation tools for online gaming accounts), even including complete self-exclusion invitations for players active on the remote channel, followed by the indication of national and local contacts to receive specific assistance.

Lottomatica Group also invests annually in training its operators to ensure that they are aware of all the intervention tools available to protect and safeguard their customers. Training activities are conducted in collaboration with CePID.

Main actions	Field of application	Time horizons
"Safe Plai" System	Customer base online	2024
Corporate Responsible Gaming Campaign	Online and physical touchpoints	2024
First level training of employees and the direct network	Lottomatica Group / Direct network employees	Each year
Second level training for employees in contact with customers	Lottomatica Group employees	Each year
Dedicated responsible gaming section on the corporate intranet	Lottomatica Group employees	2024
Direct network training	Direct network	Each year
Responsible gaming functionality on online gaming accounts	Customer base online	2024
G4 Certification (Online)	GBO Italy spa	2024
G4 Certification (Retail)	Big Easy S.p.A.	2024
WLA Certification (Online/Retail)	GBO Italy spa	2024
ISO 27001 Certification	Gamenet; GBO Italy; PWO; Totosi; Betflag	2024 - 2026
Milan Polytechnic University	Lottomatica Group research project	2024

Action	Type of financial resources	CapEx (€)	OpEx (€)	Link with financial statement items	Future financial resources (€)
Corporate Responsible Gaming Campaign	Provision of Services	-	42,968.60	Costs for services - Marketing expenses Other operating costs and expenses - Purchases of goods and other purchases	20,000
First level training of employees and the direct network	Provision of Services	n/a	n/a	n/a	n/a
Second level training for employees in contact with customers	Provision of Services	-	31,110	Costs for services - other	42,700
Direct network training	Provision of Services	-	3,050	Costs for services - other	3,050
Dedicated responsible gaming section on the corporate intranet	Internal development	n/a	n/a	n/a	n/a
Responsible gaming functionality on online gaming accounts	Internal development	n/a	n/a	n/a	n/a
G4 Certification (Online)	Provision of Services	-	31,103.90	Costs for services - other	109,800
G4 Certification (Retail)	Provision of Services	-	12,255	Costs for services - other	7,500
WLA Certification (Online/Retail)	Provision of Services	-	27,433.35	Other operating costs and charges - Other operating costs and charges	-
ISO 27001 Certification	Provision of Services	-	35,725	Costs for services - Tax, administrative, legal and financial consulting	12,500
Milan Polytechnic University	Provision of Services	-	29,280	Costs for services - other	-

Aware of the risks to the rights and freedoms of its users, the Group has implemented, and is constantly reviewing, appropriate organisational and security measures based on the risk level. This is also evidenced by the certifications obtained by the Group's companies, such as the **ISO/IEC 27701:2019** certification, held by Gamenet S.p.A. and GBO Italy S.p.A., which attests to their information security and privacy management systems' compliance with the international standard. In addition, in order to allow the broadest possible access to its legal gaming offering, the Group is engaged in activities aimed at acquiring and increasing its number of remote gaming licenses, and opening venues throughout the country that meet the highest standards in terms of protecting minors and vulnerable individuals, in order to offer an alternative channel to illegal gaming.

Metrics and targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Disclosure
requirement
S4-5

The Group has implemented Responsible Gaming programmes and is committed to ensuring a safe and regulated gaming environment with high ethical standards, preventing cyber attacks and protecting consumer data, as well as combating gambling disorder. In this regard, while no specific metric have been identified and no quantitative targets have been set, Lottomatica has implemented policies and actions, and monitors their effectiveness through the adopted controls described in the previous sections, and is also considering setting targets as part of its sustainability strategy.





4. Governance information

4.1 Business conduct [ESRS G1]

Management of impacts, risks and opportunities

Lottomatica Group upholds **ethical values, integrity, transparency, and accountability** as fundamental principles, and is committed to conducting its business in accordance with the **values** and **principles** outlined in the **Code of Ethics**, in the 231 Model, and in the **AB&C Guidelines**, with particular attention placed on **combating corruption and misconduct** throughout the value chain.



Lottomatica Group upholds ethical values, integrity, transparency, and accountability as fundamental principles, and is committed to conducting its business in accordance with the values and principles outlined in the Code of Ethics, in the 231 Model, and in the AB&C Guidelines, with particular attention placed on combating corruption and misconduct throughout the value chain.

Below is a list of IROs identified as material from the double materiality analysis, which the Group is committed to managing through targeted policies and concrete actions related to business conduct, particularly in supplier relations and the prevention of bribery and corruption.

ESRS G1 – BUSINESS CONDUCT

ESRS (SUB-TOPIC)	IRO	DESCRIPTION	POSITIVE / NEGATIVE ACTUAL / POTENTIAL	TIME HORIZON	VALUE CHAIN
Business culture	I	Incidents of behaviour inconsistent with the Lottomatica Code of Ethics and mission	Negative Potential	Medium term Long term	Upstream Own operations
Whistleblower protection	I	Incidents of behaviour inconsistent with the Lottomatica Code of Ethics and mission	Negative Potential	Medium term Long term	Upstream Own operations
	R	Non-compliance or partial compliance with the Market Abuse Regulation on inside information		Short term	Own operations
Political engagement and lobbying	I	Transparency in interactions with institutions and trade associations	Positive Actual	Short term Medium term Long term	Own operations
Management of supplier relations, including payment practices	I	Adherence to Lottomatica's values and principles throughout the supply chain (e.g. Supplier Code of Conduct, Code of Ethics, 231 Model)	Positive Actual	Short term Medium term Long term	Upstream
	R	Procurement process not aligned with the business needs due to an unstructured accounts payable management cycle and/or uncoordinated information flows between the Purchasing & Shared Services function and other functions involved in the unstructured process		Short term	Upstream Own operations
	R	Identification of unqualified or unsuitable suppliers		Short term	Upstream Own operations
	R	Inadequacies in the supplier contracting process		Short term	Own operations
	I	Raising sustainability awareness within the supply chain	Positive Actual	Short term Medium term Long term	Upstream
Bribery and corruption risks	I	Compliance with tax obligations and the payment/collection of taxes due to the Tax Authorities	Positive Actual	Short term Medium term Long term	Own operations
	R	Non-compliance or partial compliance with the regulations on related party transactions		Short term Medium term	Own operations
	R	Inadequate or non-implementation of anti-money laundering controls (231/07)		Short term Medium term	Own operations
	R	Inadequate or non-application of anomaly indicators during monitoring, as defined by the legislation, the FIU indications, and the ADM Guidelines		Short term Medium term	Own operations
	R	Potential economic damage caused by intentional dishonest or deceptive activities committed by individuals within the Company		Short term	Own operations
	R	Potential economic damage caused by intentional dishonest or deceptive activities committed by individuals outside the Company		Short term Medium term	Upstream



Corporate culture and business conduct policies

Disclosure
requirement
G1-1

Lottomatica has adopted and disseminated a set of **policies**⁴⁴ designed to **foster a corporate culture of responsible conduct, both inside and outside the Organisation**, as well as to effectively manage the identified IROs. The Code of Ethics serves as the cornerstone of this culture, reflecting the Group's commitment to upholding legal compliance and defining fundamental standards and values such as personal integrity, impartiality, and anti-corruption, which must be maintained and promoted.

In pursuit of the highest standards of ethics and integrity, Lottomatica Group has established a structured system for managing the reporting of offences,⁴⁵ ensuring robust governance through models and procedures designed to protect all stakeholders, in alignment with the 231 Model and the regulatory provisions. Together with the 231 Model and the Anti-Bribery and Corruption Policy and Guidelines, the Code of Ethics constitutes a specific training topic for all new recruits, and, in addition to being explicitly referenced in every contract, is also available on the Group's main websites, on the corporate intranet, and on the portals dedicated to the Group's commercial partners and suppliers. A specific assessment test must also be passed at the end of each course. Under the corruption management system and the 231 Model, the Group assessed areas potentially at risk of corruption and bribery. It concluded that no functions are at high risk of corruption given the existing mitigation measures.

Management of relationships with suppliers

Disclosure
requirement
G1-2

Lottomatica selects, evaluates, and manages commercial relations with its partners and suppliers based on **criteria of fairness, equity, and transparency**, ensuring respect for the **ESG criteria** throughout the value chain. The procurement processes follow standard practices, including adherence to payment terms. To monitor payments and prevent delays, the Group implements a monthly planning system based on due dates and estimated invoices, complemented by a weekly review of the financial budget and ongoing tracking of both completed and outstanding payments. As a **supply chain leader**, Lottomatica integrates additional key criteria into the selection and monitoring of its suppliers, in order to assess and mitigate potential risks and impacts. These criteria **include quality monitoring, verification of production capacity, corporate reputation, financial stability, and the promotion of sustainable practices**. With particular regard to sustainability, the Group is committed to fostering a responsible supply chain, and therefore requires suppliers listed in the register to undergo ESG assessments via the SynESGy platform, as well as regular audits to ensure compliance with the quality and sustainability standards. The evaluation process takes **social risks**, such as child labour and unsafe working conditions, as well as **environmental factors** into account. In addition, the supplier selection process also incorporates **incentives** for adopting low-impact technologies, utilising renewable energy, and obtaining recognised certifications, such as ISO 14001, EMAS, or equivalents. A representative sample of suppliers undergoes on-site audits to verify adherence to the Group's Supplier Code of Conduct and Environmental Sustainability Policy.

44) For further details on the Group's business conduct policies, please refer to the "Summary of Policies" paragraph in the "General Information" chapter.

45) For more details on the whistleblowing system, please refer to the section 'Channels for own workers and workers' representatives to raise concerns' in the chapter 'Own workforce [ESRS S1]'.

Disclosure
requirement
G1-3

Prevention and detection of corruption and bribery

In 2022, Lottomatica and its main concessionaire companies have adopted a **Management System for the Prevention of Corruption**, certified under the international standard UNI ISO 37001. This certification was extended to the entire Lottomatica Group in 2023, following an audit of the control systems and measures in place to prevent and mitigate corruption risks. The Anti-Bribery & Corruption function, led by the Anti-Bribery and Corruption Officer within the Internal Audit & GRC Department, was established as part of this initiative. The Group has also introduced a dedicated “**Anti-Bribery & Corruption Policy and Guidelines**” that outlines the commitments **to preventing corruption**, the **rules of conduct to be followed**, the **procedures for reporting violations**, and the **training and awareness activities** carried out. Additionally, it includes appropriate checks on the reliability, reputation, and suitability of third parties with whom Lottomatica considers establishing business relationships. This policy is publicly available on the Group's institutional website, as well as the corporate intranet. Specific clauses related to anti-corruption, the Code of Ethics, and the 231 Model are also included in commercial contracts. Reporting potential cases of corruption is integrated into the existing reporting management system. Such cases are handled by the Chief Audit Executive and the Chief of Corporate & Legal Affairs. Lottomatica provides specialised **training courses on the 231 Model and anti-corruption measures**, with employees required to renew their training every three years. A specific assessment test must be passed at the end of each course. Training programmes on these topics cover 100% of the functions and are also aimed at senior management and the Group's main administration, management and control bodies (OADCs).

					2024
Anti-corruption training	u.m.	Functions at risk	Managers	OADC	Other own workers
Extent of training					
Total	No.	28	59	40	2,078
Total training recipients		28	59	40	2,078
Method and duration⁴⁶					
E-learning	h	0.50	0.50	0.50	0.50
Frequency					
Frequency of training requirements		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

46) With regard to the duration of the reported training, it is specified that 0.50 h means 30 minutes of training.



Actions MDR-A

Minimum
disclosure
requirement

In order to effectively manage the IROs identified through the dual materiality analysis process in relation to business conduct, the Group pursued multiple initiatives in 2024, **focusing on training, the implementation of a whistleblowing channel, and the maintenance and potential expansion of its ISO 37001 certification:**

- **Training on the 231 Model, Code of Ethics, and AB&C management system:** The Company promotes awareness of the Model, the Code of Ethics, and the company procedures among all employees, who are therefore expected to understand their contents, comply with them, and contribute to their implementation. The mandatory employee training on Legislative Decree no. 231/01, as well as on the implementation and key updates of the Model and the Code of Ethics, is coordinated by the HR & Organisation Department in collaboration with the Risk, Ethics & Compliance Department. This training is delivered through a structured training plan that includes classroom seminars (particularly for management personnel and proxy holders) and e-learning modules. New recruits receive dedicated training on the 231 Model, the Code of Ethics, and the procedural system as part of the onboarding process. In this regard no significant instances of non-compliance with laws or regulations resulted in major penalties for Lottomatica Group during the year.
- **Whistleblowing:** Every six months, the HR & Organization Department sends an email to all employees detailing the procedure for reporting violations observed at the workplace, including conduct, actions, or omissions that harm the public interest or the integrity of Lottomatica Group. In this regard, an annual report on any whistleblower reports is submitted to the Board of Directors.
- **ISO 37001 Certification:** The Group maintained its ISO 37001 certification, which attests to the compliance of its Anti-Bribery & Corruption Management System, Policy, and Guidelines. In 2024, the certification was maintained for 5 Group companies, and was newly obtained for 2 companies that recently joined the group itself.

Main actions	Field of application	Time horizons
Training on the 231 Model and Code of Ethics	Lottomatica Group employees	Quarterly for new recruits
Whistleblowing	Lottomatica Group employees	Every six months
ISO 37001 Certification	Gamenet; Lottomatica Videolot Rete; Lottomatica Group; GBO Italy; Betflag; PWO; Totosi	Each year

Action	Type of financial resources	CapEx (€)	OpEx (€)	Link with financial statement items	Future financial resources (€)
Training on the 231 Model and Code of Ethics	Provision of services	-	19,520	Tax, administrative, legal, and financial consulting	8,540
Whistleblowing	Provision of services	-	15,465	Tax, administrative, legal, and financial consulting	13,892
ISO 37001 Certification	Provision of services	-	19,646	Tax, administrative, legal, and financial consulting	25,000

Metrics and targets

Disclosure
requirement
G1-4

Confirmed incidents of corruption or bribery

There were **no reported incidents, convictions, or fines related to violations of anti-corruption laws** during the course of 2024. Moreover, no actual impacts or cases of corruption linked to the Group through business relationships in the value chain were brought to the Group's attention.

Cases of bribery and corruption	u.m.	2024
Convictions for violations of laws regarding bribery and corruption	No.	0
Fines imposed for breaches of laws related to bribery and corruption	€	0

Disclosure
requirement
G1-5

Political influence and lobbying activities

In accordance with the Code of Ethics, the Group maintains **relationships** with **authorities, public institutions, and other entities representing collective interests** based on the highest standards of **fairness, transparency, honesty, integrity, and cooperation**. These interactions must **fully comply with all applicable laws and regulations**, as well as with the principles established in the Code of Ethics and corporate procedures. Moreover, in its dealings with public institutions, the Group is committed to representing its interests in an honest and transparent manner, while respecting the independence and impartiality of Public Administration decisions. It ensures the highest standards of fairness, clarity, and transparency in all documents, communications, and digital records. Lottomatica does **not, directly or indirectly, support or discriminate against any political or trade union organisation**. It **refrains from making any contributions, whether direct or indirect and in any form, to political or trade union parties, movements, committees, organisations, or their representatives** and candidates. Any interactions with trade unions, political parties, or their representatives or candidates are conducted in full compliance with the highest standards of fairness and transparency, and the applicable laws. This does not, however, include solidarity initiatives, which the Company considers as an essential value, and in which it actively participates and raises awareness, with subjects operating in the social field. Lottomatica Group is also a member of Confindustria – Imprese per l'Italia and Unindustria, the regional association of the Confindustria system covering Rome, Frosinone, Latina, Rieti, and Viterbo. The Group is also a member of the AGIC (Associazione Gioco e Intrattenimento in Concessione), an association under Confindustria that represents the leading concessionaire companies in Italy's public and regulated gaming sector. The AGIC aims to promote actions and investments that uphold legality, safety, and responsibility towards consumers and the community — values that have always been central to its member companies and are essential for building a robust and modern Italian gaming industry. Lottomatica is also affiliated with Assonime, an association of Italian joint-stock companies dedicated to studying and addressing issues impacting the interests and growth of the Italian economy. Finally, the subsidiary GBO Italy S.p.A. is a member of the World Lottery Association, an international organisation that, for over 20 years, has represented leading companies in the gaming sector across more than 80 countries worldwide. It is also a member of the ULIS association (United Lotteries for Integrity in Sport), which is dedicated to promoting and safeguarding integrity in the world of sports.

Lastly, it is specified that Lottomatica is not registered in the EU Transparency Register nor in similar registers within the Member States and has not identified figures with specific responsibility for monitoring lobbying activities within its administration, management, and control bodies.



Payment practices

Disclosure
requirement
G1-6

The Group companies include the general terms and conditions for the purchase of goods and services as an annex to the purchase order, setting a payment deadline of 90 days from the end of the month in which the invoice is issued, unless otherwise agreed upon in writing by the Parties. Any late payment interest due is calculated by applying the legal interest rate pursuant to art. 1284 of the Italian Civil Code, and commences from the date of the express written request of the Supplier.

Average payment time	u.m.	2024
Average payment time	No. of days	34.34
Payments meeting standard terms	No.	33,757
Total payments		33,961
Percentage of payments made within the standard terms	%	99.40
Court proceedings currently pending due to late payment	No.	0

The percentage of payments that meet the standard terms is the result of the ratio of payments made within the standard terms (90 days) to the total payments made during the year. In addition, in order to avoid possible delays in payment, a monthly planning is carried out on the previous month's overdue payments, while monitoring against the financial budget of what has been paid and what remains to be paid is done on a weekly basis.

For the purpose of calculating the average time taken to pay an invoice, the companies were considered: Agesoft, Ares, Betflag, Big Easy, Billions Italia, Gamenet, Gamenet Pro, GBO, GBO Italy, GGM, Gioca Online, GNetwork, Jolly Group, Lottomatica (relative to the months prior to the merger into Lottomatica Group), Lottomatica Digital Solutions, Lottomatica Group, Lottomatica Videolot Rete, Marim, Newmatic (relative to the months prior to the merger into Jolly Group), PWO Italia. Specifically, the January-December 2024 movements of these companies were taken into account, only as regards payables to suppliers in the strict sense. Invoices with a document date and due date of 2024 and registered in the year 2024 were taken into account, considering the balancing date as the payment date. In the absence of a balancing date, the payment time was calculated until 31 December 2024.

Target MDR-T

Minimum
disclosure
requirement

The Group has adopted specific policies and procedures and implemented various initiatives to strengthen corporate governance, uphold the highest standards of ethics and integrity, responsibly manage the supply chain, and establish itself as a leader in driving sustainable development within the value chain. In keeping with the principles and values of the Code of Ethics that guide the conduct of the business activities and the execution of the Group's strategies, these goals have been further strengthened through alignment with the UN Global Compact as of 2022. In this context, while no specific quantitative targets have been set, Lottomatica has implemented policies and actions, and monitors their effectiveness through the controls described in the previous sections, also considering setting targets as part of its sustainability strategy.

Certification of the sustainability reporting pursuant to art. 81-ter, paragraph 1, of Consob Regulation no. 11971 of May 14, 1999, as amended and supplemented

The undersigned Guglielmo Angelozzi, Chief Executive Officer of Lottomatica Group S.p.A., and Laurence Van Lancker, as executive officer responsible for the preparation of Lottomatica Group's financial statements, certify, in compliance with Article 154-bis, paragraph 5-ter, of Legislative Decree No. 58 of 24 February 1998, that the sustainability report included in the management report has been prepared:

- a) in accordance with the reporting standards applied pursuant to Directive 2013/34/EU of the European Parliament and of the Council of June 26, 2013, and Legislative Decree No. 125 of September 6, 2024;
- b) with the specifications adopted pursuant to Article 8(4) of Regulation (EU) 2020/852 of the European Parliament and of the Council of June 18, 2020.

Rome, 3 March 2025

Chief Executive Officer

Guglielmo Angelozzi



**Executive Officer responsible for the
preparation of corporate accounting information**

Laurence Van Lancker



LOTTOMatica

LOTTOMATICA GROUP S.p.A.

Via degli Aldobrandeschi 300
00163 ROMA (RM)

Share Capital Euro 10,000,000.00
(fully paid up)

Tax Code 11008400969
Rome Business Register No. - RM1694552

www.lottomaticagroup.com

To learn more, download the
Annual Report 2024