

**CORPORATE POLICY ON THE PROTECTION AND SAFEGUARDING OF HUMAN
RIGHTS****Approved by the Board of Directors****Table of contents**

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1 Lottomatica Group's commitment on the respect of human rights

The Lottomatica Group is aware that it has a fundamental role to play in the country and, for this reason, it is an active player in safeguarding the well-being of the people who work for and in the Company, who collaborate with it or who are part of the community in which it operates.

Given the new awareness of the "social" dimension of corporate sustainability that has developed in recent years, which focuses on human rights, the valorisation of people and diversity, it becomes essential and essential to affirm and respect these rights as part of the correct and responsible management of economic activities.

The principles already contained in the Group's Code of Ethics are reinforced by this Policy, which is a manifesto of the Company's commitment to promoting the protection of human rights for all the people who work in its value chain. The Group is committed to respecting and actively disseminating the principles provided for by the regulations and standards issued by international organisations of reference, including:

- 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 for Sustainable Development adopted on 25 September 2015 by the United Nations General Assembly and its 17 Sustainable Development Goals (SDGs).

The Policy aims to define, structure and develop a straightforward approach to safeguarding and protecting human rights broader than that required by law. The described process must also allow for monitoring and managing risks and opportunities related to human rights in all their forms through the systematic application at every organisational and functional level of the Company.

2 General Principles

The Company's approach is to protect the rights of people in its value chain, including its workers, suppliers and partners, migrants, children, people with disabilities, victims of discrimination, human trafficking and all forms of violence, local communities and customers.

Safeguarding and protecting the rights of employees, suppliers and partners

- **Non-discrimination:** Lottomatica is committed to opposing any form of discrimination for reasons of gender, age, disability, ethnic, social and geographical affiliation, trade union, language, religion, political or sexual orientation, gender identity, nationality, civil status, in the recruitment, hiring, training, remuneration, reward and dismissal procedures.
- **Fair and favourable working conditions:** The Lottomatica Group does not accept any act or behaviour that constitutes harassment or violence in the workplace. The Company, moreover, guarantees fair remuneration that complies with the minimum wage requirements provided for by collective agreements and the reference legislation, promoting active policies to prevent and contrast the gender gap and support the employment of persons with disabilities. The Group ensures that overtime work is remunerated per the law, collective agreements or industry standards.
- **Occupational health and safety:** Lottomatica undertakes to promote a corporate culture that guarantees suitable occupational health and safety conditions. Lottomatica is also committed to protecting the health and safety of workers through high health and safety standards to prevent any risks that may compromise the physical integrity and health of all persons with whom it interacts.
- **Training:** Lottomatica aims to promote the development of human capital by implementing specific training initiatives aimed at the professional and cultural growth of its employees and of the persons involved in the Company's activities.
- **Freedom of association and the right to collective bargaining:** Lottomatica acknowledges and promotes the right to freedom of association and collective bargaining at every level, committing to opposing any form of abuse or discrimination against persons engaged in organising activities or representing workers.
- **Contrasting child and forced labour:** Lottomatica does not tolerate any form of child labour and is committed to not involving individuals younger than the minimum standards set forth by local law. Moreover, the Company proactively opposes any form of forced or compulsory labour in all its forms.
- **Working time policy:** Lottomatica undertakes to respect working hours that allow work, family and free time commitments to be fulfilled with equal effectiveness. To better reconcile work and personal life, Lottomatica supports employees who need flexible working hours and promotes remote working projects, as company policy and second-level agreements provide.

Supporting local communities

- **Accessibility and inclusion:** Lottomatica Group is committed to helping various groups of people and achieving, also through the territoriality and capillarity of the network, those territories and population categories that may not have direct access.
- **Culture and education:** Lottomatica supports initiatives and projects carried out on the territory to disseminate cultural values and promote young people's right to education with various instruments, such as providing scholarships, organising training courses and offering freely accessible content.
- **Relations with local administrations and economic development:** In implementing the principles of subsidiarity and integrated sustainability, Lottomatica collaborates on an ongoing basis with central and local administrations, the Third Sector and local communities to address and take charge of social needs arising from forms of disadvantage or situations of fragility, including those related to the occurrence of natural disasters, by making available to the community its network of corporate volunteers, economic instruments, technologies and resources that can promote recovery.

Customer protection

- **Privacy:** Lottomatica undertakes to respect the right to privacy and the protection of personal data and information of all subjects involved in its activities, with special attention to customers and in absolute compliance with the regulations in force.
- **Responsible Gaming:** Lottomatica's attention to people is accompanied by its commitment to safeguard and protect customers and to promote a safe and responsible approach to gaming.

3 Management and Monitoring

Lottomatica verifies the effectiveness of the approach adopted mainly through dedicated instruments consisting of procedures for the systematic identification and assessment of risks both internally and externally to the Group, a system for reporting violations, a system of penalties and stakeholder communication activities.

In compliance with the sustainability guideline, the Lottomatica Group integrates the assessment of risks regarding the protection and safeguarding of human rights and, more generally, ethical risks into its "Enterprise Risk Management" model, using as a reference framework the "Enterprise Risk Management Framework - Integrating with Strategy and Performance (CoSO

ERM 2017)", an international best practice in the area of risk management systems and corporate governance aspects.

Within the framework of the ERM Model, the Lottomatica Group provides for the execution of a specific periodic assessment (at least once a year) of such risks with specific metrics and defines action plans, integrated to all effects into the broader corporate sustainability strategy, capable of strengthening the instruments provided by the internal control system and ensuring the highest level of protection of human rights. In carrying out the activities mentioned above, Lottomatica focuses particular attention on verifying the rights of workers, migrants, minors, local communities and other vulnerable persons and/or persons at risk of discrimination or violence in any form.

This risk assessment activity on human rights protection is carried out by taking into consideration, not only the legislative compliance requirements, but also the values and commitments that the Lottomatica Group expresses in the Code of Ethics, in this Policy and in the Group's policies and procedures.

In accordance with what has already been applied in the ERM context, during the risk assessment phase, business processes and their supporting documentation are mapped and analysed, after which the relevant risk areas are defined. The inherent risk associated with these risk areas is assessed by considering the following drivers:

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

More specifically, the methodology for assessing inherent and residual risk and the related drivers is defined in the LG INA 01 document "Enterprise Risk Management Model". For more details on risk assessment, see the "ERM Dashboard".

With the aim of extending the validity of its principles also outside the Group, the Company requires all suppliers and partners to accept the Code of Ethics and the General Principles of this Policy; moreover, it requires those most at risk to meet specific requirements in the field.

Ongoing stakeholder consultation and discussion activities also constitute a valuable human rights monitoring and management system.

4 Reporting

As provided for by the Code of Ethics and in order to bring to light irregular cases or alleged unlawful acts, Lottomatica has made available, on the dedicated pages of the Group's institutional

websites, systems suitable for receiving reports received from stakeholders, while protecting the whistleblower at all times in compliance with the laws in force.

The Internal Audit & GRC and the Corporate and Legal Affairs Manager are responsible for managing the reports, with the possible support of the Supervisory Board of the competent company if the facts reported are considered relevant pursuant to Legislative Decree 231/01. After verifying the relevance and basis on precise factual elements, they bring these cases to the attention of the corporate function or the competent corporate bodies to assess whether legal action should be taken or whether measures should be adopted in accordance with the law and the contractual provisions.

5 Reporting

Lottomatica undertakes to report the performance achieved in the protection of human rights in terms of management and monitoring methods, identified risks, results of assessment, management and mitigation actions in public company documents made available to stakeholders on the company website.

6 Dissemination and Updating

This policy is disclosed to all employees, also by means of special and specific training sessions depending on the areas of operations, roles and responsibilities, and is made available on Lottomatica's corporate website to all stakeholders, including collaborators, suppliers and partners, so that there may be full awareness and further drive to promote human rights as an integral part of the Lottomatica Group's value system.

This policy will be assessed for updating at least once a year on the basis of evidence emerging from assessments and monitoring of national and international trends in the protection and promotion of fundamental rights, including second and third generation rights.