

ENVIRONMENTAL SUSTAINABILITY POLICY

Approved by the Board of Directors of Lottomatica Group S.p.A. on 29 July 2024 and subsequently amended on 29 July 2026 upon approval by the Chief Executive Officer, under the delegation granted by the Board of Directors to approve non-substantive amendments.

Table of contents

1 Recitals 2

2 Purpose of the Policy 2

3 Field of Application 3

4 Governance 3

5 Objectives and Activities 4

6 Monitoring and control instruments 4

7 Green Procurement 5

8 Reporting 6

9 Dissemination and Updating 6

REVISION	REASON / REVISION CHANGES	DATE
Rev. 1	First issue	13 May 2022
Rev. 2	Update	29 July 2024
Rev. 3	Section 7 – Green Procurement revised. Update approved by the Chief Executive Officer.	29 July 2026

Lottomatica Group S.p.A
Via degli Aldobrandeschi, 300, 00163 Rome, Italy
T +39 06 898651, F +39 06 8986559, pec: lottomaticagroup@legalmail.it
Group VAT 15432831004, tax code. 11008400969, EAI RM 1694552
Share capital € 10,000,000.00 fully paid-up

1 Recitals

Lottomatica S.p.A (the Group) is the first Italian operator in the legal gaming market authorised by the Customs and Monopolies Agency and one of the major European operators.

The organisation orients its strategies and objectives towards a sustainable business model.

In view of its size and visibility, the company is aware that its conduct can contribute to sustainable development that also protects the natural environment.

This Policy outlines the Group's commitment to environmental protection by aiming to eliminate indirect emissions from offices and direct retail locations through the use of 100% certified renewable energy. It also focuses on significantly reducing direct emissions, setting the stage for achieving net-zero emissions.

Firstly, the company is dedicated to preventing, managing, and, where possible, reducing the environmental impacts associated with its operations, whether conducted directly or through suppliers and partners.

2 Purpose of the Policy

This document establishes the reference standards in environmental matters for all Lottomatica Group companies. The Policy is designed to ensure comprehensive and robust adherence to relevant legislative requirements. Additionally, the Group aims to implement the principles established by national and international reference organizations, using them as key benchmarks for this Environmental Sustainability Policy. These include:

- the 17 UN Sustainable Development Goals, which address issues such as economic and social development, the right to health and education, access to water and energy, decent work and conditions for inclusive and sustainable economic development, climate change, environmental protection, social and gender equality;
- the 2030 Agenda for Sustainable Development;
- the 2015 Paris Agreement on reducing greenhouse gas emissions;
- The COP26 Climate Conference held in Glasgow in 2021.

The approach adopted by the company is based on the following general principles:

- Prevention and reduction of impacts on the environment, basing company activities on criteria aimed at preventing pollution, reducing environmental impacts (also through the de-materialisation of processes, products and services) and safeguarding the health and

Lottomatica Group S.p.A

Via degli Aldobrandeschi, 300, 00163 Rome, Italy

T +39 06 898651, F +39 06 8986559, pec: lottomaticagroup@legalmail.it

Group VAT 15432831004, tax code. 11008400969, EAI RM 1694552

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

safety of the people involved, defining specific environmental objectives and improvement programmes aimed at minimising significant environmental impacts;

- Promoting environmental culture, through awareness-raising activities and environmental training within the company, by pursuing the development and dissemination of ecological awareness and a sense of responsibility.

3 Field of Application

This policy applies to all companies of the Lottomatica Group and therefore to all employees, internal consultants, suppliers and commercial partners.

4 Governance

To ensure effective oversight of environmental issues, the Group has established a robust governance framework involving senior corporate and business functions. This framework includes the development of an annual plan of activities and initiatives, which is crafted by the Environmental Sustainability Committee. The plan is then reviewed and endorsed by the ESG Management Committee before receiving final approval from the Group's internal board committee, all under the coordination of a specific department.

The aim is to define the set of principles, rules and procedures concerning the management and governance of environmental matters, which is one of the main themes of the sustainability strategy adopted by the Group.

ENVIRONMENTAL SUSTAINABILITY COMMITTEE

The Committee is responsible for drafting the annual plan of initiatives and activities to be implemented for the following year. It meets monthly to discuss project progress, evaluating continuous improvement activities and also ensuring the alignment of environmental activities with broader business objectives.

To ensure continuous alignment with ESG plans, a liaison function has been established to coordinate the Environmental Sustainability Committee and oversee the Group's projects. This role is responsible for managing project progress and reporting updates to both the management committee and the ESG board committee.

Lottomatica Group S.p.A

Via degli Aldobrandeschi, 300, 00163 Rome, Italy

T +39 06 898651, F +39 06 8986559, pec: lottomaticagroup@legalmail.it

Group VAT 15432831004, tax code. 11008400969, EAI RM 1694552

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

5 Objectives and Activities

Within this policy, the Group has set itself the following objectives:

- complying with environmental laws and regulations;
- minimising the use of resources, in particular by trying to reduce the use of water and the generation of waste (including plastic);
- participating in recycling programmes and promote responsible waste management through waste reduction;
- providing for a reduction of environmental impacts, including through the analysis of physical and transitional environmental risks
- providing for a reduction in GHG emissions with monitoring and control systems;
- reducing paper consumption by de-materialising documents;
- raising awareness of environmental issues among all staff by involving them in projects and initiatives and encouraging them to adopt a collaborative attitude;
- promoting stakeholder engagement and capacity building in environmental matters;
- acting consciously and consistently towards all stakeholders;
- monitoring and optimising energy consumption, increasing investment in energy efficiency solutions, such as the use of low-consumption electronic appliances;
- adopting technologies with less environmental impact also through LCA (life cycle assessment) analysis of products;
- committing to the procurement and use of renewable energy sources.

To effectively pursue the aforementioned objectives, the Group annually approves activities and projects dedicated to environmental matters, dividing them into four macro-pillars:

- Green and Circular Economy;
- Environmental Impact;
- Mobility Impact;
- Environmental Culture.

6 Monitoring and control instruments

The company verifies the effectiveness of its actions with dedicated instruments that are used systematically thanks to the implementation of an environmental management system in line with

Lottomatica Group S.p.A

Via degli Aldobrandeschi, 300, 00163 Rome, Italy

T +39 06 898651, F +39 06 8986559, pec: lottomaticagroup@legalmail.it

Group VAT 15432831004, tax code. 11008400969, EAI RM 1694552

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

lottomaticagroup.com

the most widespread international standards (such as UNI EN ISO 14001), and based on the risk management principle, which provides for:

- identifying the risks of environmental violations related to the company's activities and organisational areas;
- analysing suppliers and partners based on the following parameters: possession of environmental, quality and energy performance certifications and adoption of environmental management systems, ethical standards of conduct and Minimum Environmental Criteria (MEC);
- assessing the identified physical and transitional environmental climate risks in terms of impact and likelihood through specific metrics, and assessing the adequacy of the mitigation and remediation measures adopted in relation to the identified risks, with a specific focus on climate change;
- conducting audits in areas identified as high-risk;
- defining prevention and mitigation action plans, also shared with suppliers and partners, which may include activities to extend, revise and strengthen company procedures and controls and specific training and awareness-raising actions on environmental protection.

7 Green Procurement

When selecting suppliers, the Group prioritises those who offer goods and services with a lower environmental impact compared to alternatives used for similar purposes.

The supplier selection process includes reward mechanisms with reference to the following environmental performance elements:

- compliance with environmental assessment criteria, including but not limited to compliance with environmental legislation, implementation of processes with a focus on reducing energy consumption, and use of recyclable or compostable;
- possession of certified environmental management systems (EMAS - ISO 14001) proving the suppliers' capabilities;
- emissions reporting capacity according to the GHG Protocol;
- presence of decarbonisation plans.

In this context, the Group acts as the supply chain leader, analysing and monitoring the environmental performance of qualified suppliers. Furthermore, it is committed to actively engaging with its suppliers to improve their environmental performance. To achieve this, the Group has established a dedicated platform for analysing and verifying the environmental information provided by suppliers, and supports the engagement of business partners in improving their environmental performance, including through direct assessments and feedback.

Lottomatica Group S.p.A

Via degli Aldobrandeschi, 300, 00163 Rome, Italy

T +39 06 898651, F +39 06 8986559, pec: lottomaticagroup@legalmail.it

Group VAT 15432831004, tax code. 11008400969, EAI RM 1694552

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

Supplier engagement may also include tools such as:

- improvement plans for suppliers whose environmental performance is not considered adequate;
- periodic monitoring and updating of environmental data;
- on-site audits to verify compliance;
- training and awareness-raising initiatives (e.g. ESG webinars).

This approach helps to foster accountability throughout the supply chain and encourages suppliers to adopt sustainable and environmentally responsible practices.

8 Reporting

Lottomatica Group S.p.A. undertakes to report the performance achieved in the management of its environmental impacts (in terms of management and monitoring methods, identified risks, results of assessment activities and management and mitigation actions) in public corporate documents made available to stakeholders on the corporate website as well as through the CDP questionnaire.

9 Dissemination and Updating

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

At least once a year, this Policy will be evaluated in the light of the specific environmental legislation, the findings emerging from the assessments and the monitoring of national and international trends in the field of environmental protection.