

“REPORTS MANAGEMENT” PROCEDURE

Lottomatica Group S.p.A.

Approved by the Board of Directors of Lottomatica Group S.p.A.
18/09/2025

LOTTOMatica

SUMMARY

1. OBJECTIVE	3
1.1 RECIPIENTS	3
1.2 DEFINITIONS AND RELATED DOCUMENTS	4
1.2.1 DEFINITIONS	4
1.2.2 RELATED DOCUMENTS	5
2. OPERATING MODALITIES	6
2.1 REFERENCE PRINCIPLES	6
2.2 CHANNELS FOR REPORT SUBMISSION	6
2.2.1 INTERNAL CHANNELS DEDICATED TO THE TRANSMISSION OF REPORTS	6
2.2.2 EXTERNAL CHANNEL MANAGED BY ANAC DEDICATED TO TRANSMISSION OF REPORTS	7
2.3 INTERNAL REPORTS CONTENT	7
2.4 INTERNAL REPORTS MANAGEMENT	8
2.4.1 RECEPTION AND PRELIMINARY VERIFICATION	8
2.4.2 THE EXECUTION OF ASSESSMENTS	8
2.4.3 MONITORING OF THE CORRECTIVE ACTIONS	9
2.5 PROTECTION OF THE WHISTLEBLOWER	9
2.6 PROHIBITION OF RETALIATION	10
2.7 SANCTIONS	11
2.8 REPORTING	11
2.9 CHANGES	11
2.10 OBLIGATION OF CONFIDENTIALITY AND PROCESSING OF PERSONAL DATA	12
2.11 STORAGE AND CONSERVATION OF THE DOCUMENTS	12

1. OBJECTIVE

This procedure is aimed to regulate the process of receiving, analyzing and managing reports, regarding violations which has come to its attention in the working environment or behaviours, acts or omissions affecting public interest or Lottomatica Group S.p.A. and/or other companies of Lottomatica Group (hereinafter also “Group”) integrity and that consists in:

- administrative, accountant, civil or criminal offenses;
- illegal conduct relevant in accordance with Legislative Decree 231 of 8 June 2001, or violations related to the rules of Code of Ethics, Organization, Management and Control Model as per Decree Law 231/2001 (hereafter called “Model 231”) of the Group companies, to the procedures and internal guidelines applicable, such as “Anti-Bribery & Corruption Policy and Guidelines” and Anti-Bribery & Corruption management system of Lottomatica Group;
- conducts and acts of physical or verbal gender harassment, such as, sexual harassment, discrimination, moral and psychological violence, bullying and straining in the context of work activities, as outlined in the Code of Ethics, Gender Policy and D&I Policy.
- illegal conducts within the scope of the European Union or national acts, listed in the D.Lgs. March 23 2023 attachment n.24, or national acts that implement EU acts listed in the attachments of EU Directive 2019/1937, although not listed in the above mentioned attachment, related specific sectors (public procurement; services; financial markets and products; and laundering and terrorism financing prevention; product safety and compliance; transport security; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; privacy and protection of personal data and security of network and information systems) as well as acts or conducts that nullify the object or the purpose of EU provisions;
- acts or omissions affecting EU financial interests referred to in Article 325 of the Treaty on the Functioning of the European Union specified in secondary legislation related to EU as well as acts or conducts that nullify the object or the purpose of EU provisions;
- acts or omissions concerning the internal market, as referred to in article 26, paragraph 2, of the Treaty on the Functioning of the European Union, also including violation of the EU rules concerning competition and state aid, as well as violation concerning internal market related to acts that violate corporate tax rules or mechanisms aimed to achieve a tax benefit that that nullify the object or the purpose of EU provisions;

Reports relating to the following cases are excluded from this procedure:

- complaints, claims or requests concerning a personal interest of the whistleblower related to their work relationship or related to their relations with their supervisors;
- reports about violations already covered on a compulsory basis from Eu or national acts set out in part II of the attachment to the Legislative Decree 23 March 2023 n. 24 or from the national ones that implement EU acts listed in the attachments of EU Directive 2019/1937, even if not listed in part II of the above mentioned attachment;
- reports about violations concerning national security.

The rules and principles indicated in this procedure will not affect or limit in any way reporting obligations to the designated Authorities (Judicial, Supervisory or Regulatory).

1.1 RECIPIENTS

This procedure applies to all the societies of the Group and is directed to members of the Corporate Bodies, all employees and third parties with business relations of any kind with Lottomatica Group and/or its controlled companies as listed below:

- employees;
- employees of private sector actors, also including employees whose employment relationship is governed by Legislative Decree n.81 dated 15 June 2015 or by article 54-bis of Legislative Decree n.50 dated 24 April 2017, converted, with amendments, by law n. 96 dated 21 June 2017;
- self-employed workers that work for Group companies;

- freelancers and consultants that work for Group companies;
- volunteers and trainees, paid and unpaid, that work for Group companies;
- shareholders and people with functions concerning administration, direction, control, supervision or representation of Group companies;
- workers and collaborators that work for subjects that provide goods or services or that produce works for Group companies.

Recipients are those who report, complain to the judicial or accounting authority or that publicly disclose information on violations which has come to their notice through their work environment.

1.2 DEFINITIONS AND RELATED DOCUMENTS

1.2.1 DEFINITIONS

Code of Ethics:

Document that represents an integral part of Model 231 and expresses the principles and values to which the following subjects must refer to when carrying out their duties:

- representatives of the shareholders;
- members of the Board of Directors;
- members of the Board of Auditors;
- employees and collaborators with contractual relationships in any capacity, including occasional and/or temporary ones;
- all individuals that have commercial and/or financial relationships of any kind with the Company.

Public disclosure:

Make publicly available information about violations through the press or electronic means or otherwise through means of distributions able to reach a significant number of people.

Model of Organization, Management and Control ex Legislative Decree No. 231/01:

Document adopted by the main Group Companies, in order to prevent crimes foreseen in the Legislative Decree No. 231/01.

Supervisory Board ex Legislative Decree No. 231/2001 (hereafter, “SB”):

Body tasked with supervising the operation and compliance with the Model 231.

Anti-Bribery & Corruption Policy and Guidelines:

Document adopted by the main Group Companies, through which it expresses its commitment to fight corruption in all its forms and to promote a culture that discourages from performing corrupting activities and that facilitates prevention and detection of such activities.

Navex International Ethics Point Platform:

Web platform developed and managed by Navex International Inc., supporting the management of reports from Lottomatica Group and/or from its controlled Companies, ensuring the confidentiality of data from the reporters, and those who are reported.

People responsible for the reporting management process:

Independent and dedicated internal staff in charge of the reporting channels management. This staff is identified in the Chief Risk, Ethics & Compliance Officer and in the Chief Legal Officer.

Reporting:

Written or oral communication concerning information on infringements, as seen in paragraph 1 of this procedure.

Internal reporting:

Report made through the internal channel made available by the Company.

External reporting:

Report made through the external channel made available by the National Anti-Corruption Authority.

Anonymous reporting:

Report in which the reporter does not provide his or her personal information.

Anti-Bribery & Corruption management system:

An organization's set of interrelated elements aimed at establishing, about anti-bribery and corruption, politics, objectives and processes for the achievement of such objectives (see terms and definition of UNI ISO 37001:2016–Anti-bribery management systems–Requirements with guidance for use).

1.2.2 RELATED DOCUMENTS

- Model of Organization, Management and Control 231/2001 of the Lottomatica Group Companies.
- Code of Ethics of Lottomatica Group.
- Anti-bribery & corruption Policy and Guidelines of Lottomatica Group.
- Legislative Decree No. 231/01 containing the ***“Provisions on administrative liability of legal persons, companies and associations, including those without legal personality, in accordance with the Art. 11 of the Law No. 300, 29.09.2000”*** as amended and supplemented.
- Law No. 179/2017 containing ***“Provisions for the protection of authors of reported crimes or irregularities of which they become aware in the context of a public or private employment relationship”***.
- Directive (EU) 2019/1937 of 23 October 2019 on the protection of persons who report breaches of Union law.
- Law No. 127, of 4 August 2022: “Delegation to the Government for the transposition of European Directives and the implementation of other European Union acts–European Delegation Act 2021” which transposes the Directive (EU) 2019/1937 “on the protection of persons who report breaches of Union law”.
- Regulation EU/2016/679 on the “Protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation)” and related implementing rules.
- Legislative Decree No 24/2023–implementation of the Directive (EU) 2019/1937 of the European Parliament and Council dated 23 October 2019, on the protection of persons who report breaches of Union law and with provisions on the protection of persons who report breaches of national laws.
- UNI ISO 37001:2016–Anti-bribery management systems–Requirements with guidance for use.
- UNI PdR 125:2022–Guidelines on gender equality management system: adoption of specific Key Performance Indicators (KPIs) inherent to Gender Equality Policies in organizations.
- Law 162/2021–Amendments to the code referred to the Legislative Decree No. 198 of April 11, 2006, and other provisions on equality between men and women in the workplace (Official Gazette No. 275 of 18-11-2021).

2. OPERATING MODALITIES

2.1 REFERENCE PRINCIPLES

Lottomatica Group:

- promotes communication and information activities towards resources to ensure the broadest understanding and the most effective application of this procedure, through the explanation of the regulations regarding whistleblowing, and through the explanation of how channels work and how to access them and of the tools provided to make reports and of the sanction system in the event of violation. To this end it is foreseen that with a semi-annual frequency a specific communication will be sent to all employees by email
- encourages each subject to promptly report potential illegal behaviours or irregularities, as explained in paragraph 1
- guarantees full confidentiality and non-disclosure of the names of the reporting/reported parties and of the facts reported, even if are later proven to be inaccurate or unfounded, except as required by law. The breach of confidentiality involves disciplinary liability, without prejudice to any other form of liability required by law (see also par. 2.9)
- informs that personal data (including also eventual specific data such as racial or ethnical origin, political views, religious or philosophical beliefs) of reporters or of other parties involved, will be processed in compliance with the provisions of current regulations on the protection of personal data, to verify the legitimacy of the report and its management, and applying in any case the protections provided concerning confidentiality of information, referred to in the following paragraph 2.10.

2.2 CHANNELS FOR REPORT SUBMISSION

In accordance with current legislation, reports shall be made through the following channels:

- internal channel provided by Lottomatica Group societies;
- external channel managed by ANAC;
- public disclosure;
- complaint to the judicial or accounting authority.

The whistleblower must use the internal channel first, except in the cases in which it's possible make an external report, as seen in paragraph 2.2.2

2.2.1 INTERNAL CHANNELS DEDICATED TO THE TRANSMISSION OF REPORTS

Lottomatica Group societies, by appointment of the Board of Directors, identified as responsible of the reporting management process the Chief Risk, Ethics & Compliance Officer and the Chief Legal Officer.

Lottomatica Group, **with the aim of facilitating the reporting activities, has set up through a specialized provider dedicated channels that** guarantee full confidentiality of the names of the reporting/reported parties as well as of the facts reported and the related documents. The available channels are:

- a web channel (EthicsPoint platform) available at the internet address EthicsPoint-Lottomatica;
- a phone line available 24 hours a day;
- a direct meeting with those responsible of the reporting management process.

The whistleblower can submit, anonymously and not, a report filling a specific guided form or through the vocal channel, providing eventual supporting files and documentation. Through this channel the reporter can eventually dialogue with individuals in charge of assessing the received reports in the Group.

Beside the above-mentioned channels, there are still the channels **specifically created within the Models 231 of the Group Companies and the Anti-bribery & Corruption Policy and Guidelines, such as:**

- dedicated email address.

Through these ways, **it is possible to carry out the reports related to the commission or alleged commission of crimes referred to the Legislative Decree N°. 231/01, as well as any violation or alleged violation of the Code of Conduct, of the same Models 231 and/or of the procedures established for their implementation.**

If the internal report is submitted to a different subject than the Chief Risk, Ethics & Compliance Officer and the Chief Legal Officer, the recipient shall forward it to those responsible of the reporting management process within 7 days after receipt, by notifying the whistleblower at the same time.

The recipient can also forward the report by filling the dedicated web form and attaching available documents related to the reported facts to allow the required evaluations.

The non-transmission of reports by parties not responsible of their management, constitutes a violation of this procedure, with the consequent application of disciplinary sanctions, in the event of proven lack of good faith.

Lastly, Lottomatica Group identifies in the Risk, Ethics & Compliance Department the function responsible to provide adequate information on the procedures to follow to make reports.

2.2.2 EXTERNAL CHANNEL MANAGED BY ANAC DEDICATED TO TRANSMISSION OF REPORTS

In compliance with the provisions on whistleblowing, it is possible to make external reports to the National Anti-Corruption Authority (ANAC) about breaches on EU law, if any of the following conditions are met:

- in the working environment it's not mandatory the activation of an internal reporting channel or even if its mandatory but it's not active or, if it is, it's not in line with the provisions of legislation (art.4 of D.Lgs. n. 24/2023);
- the reporting person has already made a report and it had no further effect;
- the reporting person has reasonable grounds to believe that, if an internal report is made, it wouldn't have an effective follow-up or that the same report could lead to retaliation;
- the reporting person has reasonable grounds to believe that the violation might lead to an imminent or clear danger for the public interest.

About the channel, the procedures and the conditions to make external reports, please refer to the provisions of the related legislation (art. 8 of D.Lgs. 24/2023) and of the ANAC website.

It is also possible to make an external report through public disclosure.

2.3 INTERNAL REPORTS CONTENT

Any internal report, also received in anonymous form, must be documented and detailed, in order to provide all the elements necessary to carry out the due verifications and to assess the truth of the reported facts. In particular, the report should preferably contain the following elements:

- if not anonymous, the personal data of the subject that submits the report, with indication of the position within the Company or the relationship with the Group;
- a clear and complete description of the reported facts and of how the reporter has become aware of them;
- the time and place circumstances where the reported facts were committed;
- the personal details or other elements that allow to identify the subject that has put in place the reported facts and the people involved;
- the indication of any other subjects that can witness the reported facts;
- any documents that can confirm the truth of the reported facts;
- any other information that can confirm the truth of the reported facts.

In verifying the truth of the report received, the reporter may be contacted to provide any necessary further information.

2.4 INTERNAL REPORTS MANAGEMENT

2.4.1 RECEPTION AND PRELIMINARY VERIFICATION

All reports received are subject of preliminary verification by those responsible of the reporting management process that, within a reasonable period of time related to the activities to perform, perform an initial analysis to verify the existence of facts and legal basis, as well as the relevance and the presence of enough elements to deepen them.

After the analysis phase, those responsible of the reporting management process consider whether to proceed with further investigation/verification or to close and archive the report.

In particular, those responsible of the reporting management process:

- if they consider that the facts are not relevant, unfounded or so general that it's not possible to conduct any verification, they can request further information to the reporter through the dedicated database and/or archive the report. If they want to archive the report those responsible of the reporting management process formalize the reason that brought them to that decision and communicate it to the reporting person;
- if they consider that the facts are relevant to the D.Lgs. 231/01, those responsible of the reporting management process transmit the report and the outcome of the preliminary verification to the competent Supervisory Board. The SB can decide, regardless of the evaluations of those responsible of the reporting management process, to proceed with further verification or control if considered necessary or appropriate;
- if they consider that the facts are relevant or that need further details, those responsible of the reporting management process, proceed to carry out the necessary checks by sending eventually the report and the outcome of the preliminary verification to the Department considered the most competent to perform the subsequent verification;
- in the event that the reported facts are deemed relevant in accordance with UNI PdR 125:2022, the persons in charge of the report management process forward the report and the results of the preliminary analysis to the Chief People Officer. The CPO may decide, independently of the assessments of the persons in charge of the report management process, whether to proceed with further checks and controls deemed necessary or appropriate.

During this phase, those responsible of the reporting management process ensure the confidentiality of the information provided in the report (for example the reporter/reported personal data): the prohibition on disclosure of the whistleblower's identity refers not only to the name of the reporter but also to every element of the report, through which is possible, even indirectly, to reveal the reporter.

At the end of the verification, within a period of time not exceeding three months following the acknowledgement of receipt from the report, or, if no notice has been sent to the whistleblower, within three months and seven days, those responsible of the reporting management process proceed to give appropriate feedback in the event of internal reports.

The methods described shall also apply if the report concerns members/Chairmen of the corporate bodies, giving timely notice to the CEO of Lottomatica Group (Chairman if the latter is involved) and to the CEOs of the eventual companies involved (Chairmen if these last are involved).

It is also specified that if the report is about one or more of those responsible of the reporting management process, the internal platform in use ensures that the report is received only by the process owner not involved in the report that will apply the same operating methods above mentioned.

2.4.2 THE EXECUTION OF ASSESSMENTS

All of the reports that, during the preliminary investigation, are considered relevant are subjected to further study by:

- the Risk, Ethics & Compliance Department that in coordination with the Legal Department, performs the verification activities, eventually involving the affected Departments/Areas, such as the reported/reporting party, and giving sufficient notice to the Lottomatica Group CEO and to the CEOs of the societies eventually involved in the report;

- in case of reports relevant for the purposes of D.Lgs. 231/01, by the Supervisory Body that may proceed autonomously (in this regard please refer to the information of Model 231 of the society involved in the report) or may rely on the support of the Risk, Ethics & Compliance Department, of another Department/business area or of third parties;
- in the case of relevant reports pursuant to UNI PdR 125:2022, of the Chief People Officer, who may proceed independently or may rely on the support of the Risk, Ethics & Compliance Department, other Department/Corporate Area or third parties.

At the end of the verification phase, even if the report is considered unfounded, the Risk, Ethics & Compliance Department and the Legal Department, also with the support of the Department responsible for the verifications, shall issue a summary report on the investigations carried out and the evidence that emerged.

Subsequently, the Risk, Ethics & Compliance Department and the Legal Department submit the outcomes of the investigations carried out for evaluation to the corporate bodies/competent Departments, in order to take appropriate action and, if necessary:

- can arrange with the manager of the concerned Department the eventual action plan to remove any weaknesses of the internal control system;
- can arrange with the other Departments involved eventual initiative to be taken to protect the Group's interests (for example: legal action).

It is specified that all of the involved Departments must guarantee absolute confidentiality of the reporter and the reported during the verification activity, as well as of the object of the report.

Once that the communication on the disciplinary/contractual actions adopted is received from the Corporate Bodies/competent Departments, those responsible of the reporting management process archive the report attaching the supporting documentation).

2.4.3 MONITORING OF THE CORRECTIVE ACTIONS

If, for the removal of the critical issues identified, a corrective action plan is agreed between the managers of the involved Departments/Areas and the Risk, Ethics & Compliance Department, the latter monitors the implementation of the arranged plan.

2.5 PROTECTION OF THE WHISTLEBLOWER

Lottomatica Group protects the whistleblowers (as identified in par.1.1) that, at the time of the report or complaint to the judicial or accounting authority or at the time of the public disclosure, have reasonable grounds to believe that the information on the reported violations, publicly disclosed or reported, are true and fall within the scope of this procedure.

In addition, the protection of the whistleblowers also applies, other than when the legal relationship is ongoing, if the report occurs in the following cases:

- when the legal relationship has not yet started, if the information on the reported violations was collected during the selection process or in other pre-contractual steps;
- during the trial period;
- after the termination of the legal relationship if the information on the reported violations was collected during the relationship itself.

The protection measures are also applied to:

- the facilitator (individual that assists the whistleblower during the reporting process, that operates in the same work environment and whose assistance must remain confidential);
- the people in the same work environment of the whistleblower, of who lodged a complaint or of the person who made a public disclosure and that are tied to them by a stable emotional bond or within the fourth grade of consanguinity;
- the coworkers of the whistleblower, of who lodged a complaint or of the person who made a public disclosure, that work in the same work environment of people and that have with them a habitual relationship;

- entities owned by the whistleblower or for which they work as well as the entities operating in the same work environment of the above-mentioned people.

The protection measures provided for by D.Lgs. 24/2023 are also applied when the report or the public disclosure was made if one of the following conditions is met:

- the whistleblower has already made an internal and external report or directly made an external report without receiving feedback within the time allowed of the planned or adopted measures to follow up on reports;
- the whistleblower has reasonable grounds to believe that the violation might lead to an imminent or clear danger for the public interest;
- the whistleblower has reasonable grounds to believe that the external report may lead to a risk of retaliation or might not have an effective follow-up due to the specific circumstances of the case, such as the ones where evidence can get concealed or destroyed or where there might be reason to fear that the recipient might be in collusion with the infringer or involved in the violation itself.

The reasons that lead the person to report or denounce or to disclose publicly are irrelevant in order to give protection.

Except for what is provided in art.20 of D.Lgs. n. 24 of March 10, 2023, the protection for the whistleblowers is not guaranteed when its proven, even with first instance judgment, their criminal responsibility for calumny or defamation or in any case of the same crimes committed with the complaint to the judicial or accounting authority or when it's proven their civil liability, for the same degree, in cases of willful misconduct or gross negligence. To the whistleblowers is also imposed a disciplinary sanction (see also par.2.7).

The same measures are also applied in cases of report or complaint to judicial or accounting authority or in cases of anonymous public disclosure, if the whistleblower was subsequently identified and suffered retaliation.

2.6 PROHIBITION OF RETALIATION

Lottomatica Group prohibits retaliation towards whistleblowers.

Below are some cases of retaliation, as provided by art. 17, of D.Lgs. 24/2023 and in particular:

- dismissal, suspension or equivalent measures;
- downgrading or no promotion;
- function changes, change of the workplace, salary reduction, change in working hours;
- suspension of training or any restriction on its access;
- negative note of merit or reference;
- the adoption of disciplinary measures or other penalty, including financial ones;
- coercion, intimidation, harassment, ostracism;
- discrimination or at least adverse treatment, including with the respect to gender and other diversity characteristics;
- the non-renewal of a fixed-term employment contract to a permanent one, whether the employee had a legitimate expectation to such renewal;
- the non-renewal or early termination of a fixed-term employment contract;
- damages, including reputational ones, particularly on social media or economical or financial prejudices, including loss of economic opportunity and loss of income;
- early termination or cancellation of the contract for the supply of goods or services;
- cancellation of a license or of a permit;
- request to undergo psychiatric or medical assessments.

In the context of legal or administrative proceedings or at least extrajudicial disputes concerning the verification of prohibited conducts, acts or omissions under this article towards whistleblowers, it is assumed that they happened due to the report, the public disclosure or the complaint to the judicial or accounting authority. The burden of proving that such behaviours or acts were motivated by grounds unrelated to the report, to the public disclosure or to the complaint is on the person that engaged in such behaviour.

The whistleblowers that believe to have suffered retaliation, can notify ANAC for the subsequent actions of the case.

Lastly, Lottomatica Group reserves the right to take appropriate action against whoever attempts or threatens to take retaliatory action against the whistleblower, in compliance with this procedure (see also par. 2.7).

2.7 SANCTIONS

Lastly, Lottomatica Group reserves the right to:

- take appropriate disciplinary actions, if, as a result of the verification activity, violations of legislation, Model 231, Code of Ethics, Anti-bribery & corruption policy and guidelines and or internal procedures/guidelines were discovered;
- take appropriate disciplinary actions if:
 - there were acts of retaliation towards whistleblowers;
 - the report has been hampered or there was an attempt to hamper it;
 - the provided channels and the adopted procedure for the management of reports do not comply with the law;
 - there is a breach of confidentiality;
 - there is lack of verification and analysis of reports received;
 - it's proven, even with first instance judgment, their criminal responsibility for calumny or defamation or in any case of the same crimes committed with the complaint to the judicial or accounting authority or when it's proven their civil liability, for the same degree, in cases of willful misconduct or gross negligence;
- take appropriate disciplinary actions and/or sanction and/or legal measures to protect staff, its rights, its assets, its image towards whoever made reports not in good faith, therefore false, unfounded or opportunistic and/or for the sole purpose of slander, defame or prejudice to the reported person or to other people involved in the report. Reserves the right take appropriate action against whoever attempts or threatens to take retaliatory action against the whistleblower in compliance with this procedure.

In this case the Risk, Ethics & Compliance Department, in coordination with the Legal Department, submits such behaviour to the judgement of Corporate Bodies/competent Departments, in order to take appropriate action. In particular, the investigation activities upon applying penalties are carried out:

- in case of reports about members of the Corporate Bodies, by not involved members of such bodies, to take appropriate disciplinary actions/sanctions;
- in case of reports about employees (including managers), by Human Resources & Organization Department and where required by the CEO of Lottomatica Group and by the CEOs of other societies which may be involved in the report, to take appropriate disciplinary actions in compliance with the provisions of the applicable National Collective Labor Agreement;
- in case of reports about third parties (providers, partners, commercial counterparts, etc.) by the Department that manages the contractual relationship, for the activation of the adequate contractual clauses, such as the termination of employment.

2.8 REPORTING

Every year, those responsible of the reporting management process provide:

- to the SB of each Group Companies, a summary report of relevant received reports, with the outcome of the analyses and their status, including the adoption (or the non-adoption) of sanctions;
- to the Board of Directors of Lottomatica Group a summary report of all received reports with the outcome of the analyses and their status, including the adoption (or the non-adoption) of sanctions.

2.9 CHANGES

Any amendments and/or additions to this procedure must be approved by the Board of Directors of Lottomatica Group, except for changes resulting from the implementation of organizational changes or relating to the mere application of regulatory provisions, which may be approved by the Chief Executive Officer of Lottomatica Group.

2.10 OBLIGATION OF CONFIDENTIALITY AND PROCESSING OF PERSONAL DATA

Lottomatica Group ensures that reports are not used beyond what is necessary to provide adequate feedback. If the whistleblower shares unnecessary and/or not relevant to the report, the Company proceed with erasure. The identity of the reporting person and any other information from which it can be discovered, directly or indirectly, such identity cannot be revealed, without the express consent of the whistleblower, to persons other than those who are in charge to receive or give feedback to reports.

Concerning the disciplinary action:

- the identity of the reporting person cannot be revealed, if the objection on the disciplinary charges is based on different and further investigations than the report even if subsequent to it;
- if the objection on the report is well-grounded, in whole or in part, and the knowledge of the whistleblower's identity is necessary for the reported's defense, the report can be used for the disciplinary procedure exclusively upon express consent of the whistleblower on the revelation of their identity.

The whistleblower is notified with a written communication with the reasons of the revelation of the sensitive data if the knowledge of the identity of the whistleblower and the related information is necessary for the defense of the involved person.

It is also specified that:

- in criminal proceedings, the identity of the whistleblower is confidential in the manner and within the limits provided for by the article 329 of the Code of Criminal Procedure;
- In proceedings by the Court of Auditors, the identity of the whistleblower cannot be revealed until the end of the preliminary investigation phase.

To ensure the proper processing of personal data related to the report, those responsible of the reporting management process –the Chief Risk, Ethics & Compliance Officer and the Chief Legal Officer –are specifically designated by the Data Controller as subjects authorized to the processing of personal data ex art. 29 and 32, paragraph 4 of the GDPR and the provider specialized in the reporting management services (GCS Compliance Services Europe Unlimited Company –Navex) is appointed responsible of the treatment of personal data ex art. 28 GDPR.

With regard to the processing of personal data, please refer to the privacy policy attached to this procedure.

2.11 STORAGE AND CONSERVATION OF THE DOCUMENTS

In order to ensure the reports and related activities management and traceability, those responsible of the reporting management process ensure the storage of the reports and of the supporting documentation for a period of 5 years from the date of notification of the final outcome of the reporting process.

In particular the storage and the conservation occur:

- in case of using the EthicsPoint platform, by the platform itself;
- in case of using the vocal channel, by a detailed summary sent to those responsible of the reporting management process; who will take care to share the summary with the whistleblower for verification, correction or confirmation of the content;
- in case of direct meeting with those responsible of the reporting management process, through a specific written report signed by the whistleblower, after proper verification of the correctness of the information contained.

Eventual other involved Departments/areas take care as well, within their respective areas of responsibility, of the storage and conservation of the documentation produces, in printed and/or electronic form, in order to allow the reconstruction of the different stages of the process.

LOTTOMatica
www.lottomaticagroup.com