

## **GENERAL WHISTLEBLOWING INFORMATION**

### **Reporting and denunciation of corporate offenses pursuant to Legislative Decree 24/2023.**

The discipline of so-called "Whistleblowing", introduced into Italian law by Legislative Decree. 24/2023 in order to counteract any corruption phenomena in the work environment, provides specific protection for the whistleblower who wishes to communicate, disclose or report an offence, so that he or she can act without the fear of suffering prejudicial consequences towards him.

This information is aimed at all subjects who deal with BRIGHTSTAR Lottery Spa and its Italian subsidiaries and for whom the protections - provided for by the Legislative Decree - apply. 24/2023 – in the event that they decide to report any corporate offenses in which they were directly involved or of which they had become aware.

The document aims to inform potential reporting subjects in a clear and concise manner on the internal reporting channel made available for the so-called. whistleblowing, on its operating mechanism, on the procedural process, on the deadlines for feedback, and on the observance of the relevant legal provisions by the Companies.

The document also provides details on the additional reporting channels provided for by the decree (External Reporting, Public Disclosure and Complaint).

## **INTERNAL REPORTING**

Observance of the prohibition of retaliatory acts in compliance with the provisions of art. 17 of the Legislative Decree. n. 24/2023.

BRIGHTSTAR Lottery Spa and its Italian subsidiaries guarantee absolute compliance with the prohibition on implementing any retaliatory act against people who make reports pursuant to Legislative Decree. 24/2023.

Therefore, no disciplinary or other action is permitted based on a report against the Whistleblower.

**Furthermore, indirect actions against:**

- facilitators;
- people from the same working context as the reporting person, the person who has filed a complaint with the judicial or accounting authority or the person who has made a public disclosure and who are linked to them by a stable emotional or kinship bond within the fourth degree;
- work colleagues of the reporting person or of the person who has filed a complaint with the judicial or accounting authority and made a public disclosure, who work in the same working context as the person and who have a usual and current relationship with that person;
- entities owned by the reporting person or by the person who has filed a complaint with the judicial accounting authority or who has made a public disclosure or for which the same people work, as well as entities that operate in the same working context as the aforementioned people.

## 2. WHO

### *Subjects entitled to Internal Reporting*

Pursuant to art. 3 of Legislative Decree 24/2023, the following subjects can make reports, benefiting from the protections provided for by the decree:

- Employees
- Persons with administrative, management, control, supervisory or representation functions, even if these functions are exercised merely de facto
- Shareholders
- Self-employed workers, freelancers and consultants who carry out their work at the Group
- Collaborators of companies supplying goods or services
- Volunteers and interns, paid and unpaid, who work for BRIGHTSTAR Lottery

The report can be made during the employment relationship or other type of legal relationship, but also during the probationary period and before (for example, in the application phase) or after the dissolution of the employment relationship or legal relationship (for example example, in the retirement phase).

## 3. WHAT

## *Subject of the report*

In general terms, pursuant to art. 1 of the Legislative Decree. n. 24/2023, violations of national or European Union regulatory provisions that harm the public interest or the integrity of the private entity, of which the whistleblowers became aware of in the work context, are subject to reporting. In particular, violations must be understood as those:

- committed or not yet committed which the Reporter reasonably believes could be committed on the basis of concrete elements.
- concerning behaviours, acts or omissions of which the Reporter has become aware within the working context.
- concerning actions aimed at concealing violations, such as, for example, the destruction of evidence regarding the commission of the violation.

They are excluded:

- news that is clearly unfounded
- information that is already totally in the public domain
- information acquired solely on the basis of unreliable rumors or rumors (so-called rumours).

**Based on the subject matter, violations can be distinguished as follows:**

- Violations of national law
- Civil torts
- Administrative offences
- Relevant unlawful conduct pursuant to Legislative Decree no. 231/2001, violations of the organization and management models provided for in Legislative Decree no. 231/2001
- Criminal offences
- Accounting offences

**Offenses committed in violation of EU legislation indicated in Annex 1 to Legislative Decree no. 24/2023 such as:**

- offenses relating to public procurement, services, products and financial markets, prevention of money laundering, product safety and compliance, environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; protection of privacy and protection of personal data and security of networks and information systems.
- Acts or omissions detrimental to the financial interests of the European Union.
- Acts or omissions concerning the internal market, which compromise the free movement of goods, people, services and capital.
- Acts or behaviors that defeat the object or purpose of the provisions of the European Union in the sectors indicated in the previous points.

**Furthermore, all violations provided for by the Whistleblower Policy or the Code of Conduct are also considered to be included.**

- All violations provided for by the **Whistleblower Policy, by the Code of Conduct** or malfunctions concerning the **Corruption and Prevention Management System (SGPG) pursuant to the ISO 37001 Standard** are to be considered included.

### **3.2 Reports that do not benefit from the protections provided for by the Legislative Decree. 24/2023:**

- Violations already regulated on a mandatory basis by the European Union or national acts indicated in the art. 1 paragraph 2 Legislative Decree. n. 24/2023
- Reports of breaches relating to national security, as well as procurement relating to defense or national security aspects, unless such aspects fall under relevant secondary law of the European Union
- Disputes, claims or requests linked to a personal interest of the reporting party which relate exclusively to their individual working relationships, or inherent to their working relationships with hierarchically superior figures.

**However, in any case the protections ensured by the Whistleblower Policy and the Code of Conduct remain unaffected.**

No protection applies in the event of ascertained (with a first instance sentence) criminal or civil liability - due to malice or gross negligence - of the whistleblower for defamation or slander. Disciplinary sanctions are provided for by law in such cases.

## 4. HOW

### 4.1 Integrity Line

In compliance with legal obligations, BRIGHTSTAR Lottery and its subsidiaries make available to those entitled to report an Integrity Line platform provided by a third-party provider in compliance with European and national safety regulations and standards. The channel allows the sending of written or telephone reports, in a completely anonymous form or, at the choice of the Reporter, in a non-anonymous form.

Access to the Integrity Line platform is possible through the link <https://brightstarlottery.integrityline.com/> (reachable from the BRIGHTSTAR institutional sites and the Company Intranet) or by calling the number 800194674.

## 5. REPORTING MANAGEMENT

Within 7 days the report is taken care of by the Manager and the reporting party receives feedback:

- through an acknowledgment of receipt message published within the portal, in the follow your case section, if you have chosen to use Integrity Line;

In compliance with reasonable deadlines and the confidentiality of the data, the Report Manager carries out an assessment of the existence of the essential requirements of the report to evaluate its admissibility and therefore be able to grant the reporting person the expected protections.

It should be noted that it is essential that the report is as detailed as possible in order to allow the Report Manager to deliberate on the facts.

In particular, the following must be clear:

- the circumstances of time and place in which the reported event occurred;
- the description of the fact;
- the personal details or other elements that allow the identification of the person to whom the reported facts can be attributed;
- It is also useful to attach documents that can provide elements of substantiation of the facts being reported, as well as the indication of other subjects potentially aware of the facts.

In any case, the Manager will respond to the report within 3 months from the date of acknowledgment of receipt.

## **6. INVESTIGATION PHASE**

Management of reports occurs through the following activities: 1) Reception; 2) preliminary verification; 3) Investigation; 4) assessment and decisions; 5) archiving and conservation.

## **7. GUARANTEES OF CONFIDENTIALITY**

The guarantees of confidentiality are the same for both anonymous and ordinary (non-anonymous) reports.

The IT platform - Integrity Line - ensures that the communications received from the Reporting Party are managed with a guarantee of confidentiality both as regards the identity of the Reporting party and as regards the content of the reports. Identity and content are protected by security measures and encryption techniques suitable to guarantee maximum secrecy pursuant to EU Regulation 2016/679 on the protection of personal data.

Furthermore, all people involved in any capacity in the process of managing the report are obliged to treat the content and documentation of the same with the utmost confidentiality.

The identity of the Reporter - and any other information from which such identity can be deduced, directly or indirectly - must be kept confidential at every stage of management of the report, unless express consent is given in writing by the Reporter.

In the event of the initiation of disciplinary proceedings in which the identity of the Whistleblower is indispensable for the defense of the accused, the Whistleblower will be notified via written communication and will be able to decide whether or not to give his/her consent to the disclosure of his/her identity so that his/her reporting can be used for the purposes of the proceeding.

## **8. PERSONAL DATA PROCESSING**

For the processing of personal data, connected to the management of reporting channels and carried out in compliance with current legislation on the protection of personal data, please refer to the specific **Privacy Policy** (in PDF attached) on the company websites.

## **9. STORAGE OF DOCUMENTATION RELATED TO REPORTS**

Pursuant to art. 14 of Legislative Decree 24/2023, the reports and related documentation are kept for the time necessary to process the report and in any case no later than five years from the date of communication of the final outcome of the reporting procedure in compliance with the obligations of confidentiality referred to in the art. 12 of Legislative Decree 24/2023 and the principle referred to in articles 5, paragraph 1, letter e), of Regulation (EU) 2016/679 and 3, paragraph 1, letter e), of Legislative Decree no. 51 of 2018.

## **FURTHER REPORTING/COMPLAINT METHODS**

The protections described above and provided for by Legislative Decree 24/2023 also apply to the additional reporting methods introduced by the legislation and listed in point 9.

Without prejudice to the provisions of the law, in the event that the reports concern the **Reporting Manager and/or the Anti-corruption Manager**, the forwarding of the report, can be made to the following channels made available by BRIGHTSTAR:

- Email: [odvbrightstar@brightstarlottery.com](mailto:odvbrightstar@brightstarlottery.com)

the channel mentioned above uses technology that allows the receipt of messages to be processed anonymously.

- Ordinary mail to the address of the registered office:

**Supervisory Body - [company name] Viale del Campo Boario 56/d, 00154 Roma.**

## **10. EXTERNAL REPORTING (ANAC)**

Only when specific conditions are met is it possible to carry out a so-called External reporting to ANAC (National Anti-Corruption Agency).

Pursuant to art. 6 of Legislative Decree 24/2023, the reporter can use the external channel (ANAC) when:

- within the work context, the mandatory activation of the internal reporting channel is not envisaged or this, even if mandatory, is not active even if activated, does not comply with what is required by law;
- the reporting person has already made an internal report and it has not been followed up on;
- the reporting person has reasonable grounds to believe that, if he/she made an internal report, it would not be followed up effectively or that the report itself could lead to a risk of retaliation;
- the reporting person has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest.

If the Whistleblower has been subjected to retaliation following a report made; in this case ANAC will forward the checks to the labor inspectorate.

In the event of one of these conditions and pursuant to art. 7 of Legislative Decree 24/2023, the report can be made in written form via an IT platform or orally via telephone lines or voice messaging systems or, at the request of the reporting person, through a direct meeting set within reasonable deadlines.

All the information necessary for the use of this channel can be found on the ANAC institutional website [www.anticorruzione.it/-/whistleblowing](http://www.anticorruzione.it/-/whistleblowing)

## **11. PUBLIC DISCLOSURE**

The art. 15 of the Legislative Decree. 24/2023 introduces a further reporting possibility consisting of the so-called Public Disclosure.

With Public Disclosure, information on violations is made public through the press or electronic means or in any case through means of dissemination capable of reaching a large number of people.



However, to benefit from the protections provided by the Legislative Decree. 24/2023, the Public Disclosure of violations must occur in the presence of one of these conditions:

- The reporting party has previously made an internal and external report or has directly made an external report without receiving feedback within the established deadlines regarding the measures envisaged or adopted to follow up on the reports;
- The reporting party has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest;
- The whistleblower has a well-founded reason to believe that the external report may involve the risk of retaliation or may not have an effective follow-up due to the specific circumstances of the specific case, such as those in which evidence may be hidden or destroyed or in which there is fear that the person receiving the report may be colluding with the perpetrator of the violation or involved in the violation itself.

Finally, it should be noted that the reporter who carries out a Public Disclosure is considered a different person from someone who constitutes a source of information for journalists. In such cases, in fact, Legislative Decree 24/2023 provides that the rules on professional secrecy of those practicing the journalistic profession remain unchanged, with reference to the source of the news.

## **12. REPORT TO THE JUDICIAL OR ACCOUNTING AUTHORITY**

The Legislative Decree 24/2023 also recognizes - for subjects entitled to make reports - the possibility of contacting the competent national judicial and accounting authorities to forward a report of illicit conduct of which they have become aware in a work context.

*The additional reporting channels provided for by the Whistleblowing Policy and the Code of Conduct remain valid.*

