

Business Continuity Policy

Issue cycle	Acronyms	Date	Signature
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Classification	Golden Copy
Public	Filed at: GEQ

Rev. N.	Scope of the review	Date
4.1	General document review. Changes made to Annex B: addition of ISO 22361	31/01/2023
4.0	Document updated considering the Group's internationalization process	14/06/2022
3.0	Crisis Committee members update following company reorganization	31/12/2021
2.0	General document review: <ul style="list-style-type: none">• Description of the Business Continuity Management process;• Business continuity Roles and Responsibilities definition.	27/10/2020
1.0	First issue	12/10/2018

TABLE OF CONTENTS

1	FOREWORD	3
2	SCOPE	3
3	DEFINITIONS	3
4	GOALS OF THE PROGRAMME	3
5	ROLES AND RESPONSIBILITIES	4
6	REVIEW AND MAINTENANCE	4
7	REFERENCE DOCUMENTS	4
8	ANNEX A: DEFINITIONS	5
9	ANNEX B: REGULATORY REFERENCE AND INTERNATIONAL STANDARDS	5

1 FOREWORD

Business Continuity, defined as ‘the capability of an organisation to continue the delivery of products and services within acceptable time frames at predefined capacity during a disruption’¹, is considered a value, an investment, and an opportunity for Sisal Group. As an international leader in responsible gaming, Sisal reckons that an effective business continuity and crisis management system is not only a competitive advantage but also an essential value for the long-term sustainability and profitability of our business.

2 SCOPE

Sisal Group is committed to supporting the business continuity and crisis management system with an adequate allocation of financial, human, infrastructural, and technological resources, consistent with the continual improvement framework (Plan - Do - Check - Act). Sisal is also fully committed to the implementation of a Business Continuity Management System that meets best practices (e.g., *BCI Good Practice Guidelines*) and complies with international (ISO) standards on business continuity and crisis management².

The document herein applies to Sisal S.p.A. and all other Group companies, with the exception of: Sisal Gaming S.r.l., Acme S.r.l., Network Italia S.r.l., and Rete Servizi Integrati S.r.l.

The aforementioned companies are left out of the scope both because two of them (Network Italia S.r.l. and Rete Servizi Integrati S.r.l.) are not 100% owned by Sisal S.p.A. and because the activities they carry out do not reflect the core business of the Group.

Branded and *unbranded* Points of Sales are also excluded from the scope, either because most of these belong to the affiliate (or *unbranded*) channel, or because the sales network is highly widespread and redundant.

3 DEFINITIONS

The Appendix contains a table of definitions of the main terms mentioned in the present document with their respective explanations.

4 GOALS OF THE PROGRAMME

The main goals of Sisal Group’s Business Continuity Management System are as follows:

1. Safeguarding the health and safety of people (including staff, suppliers, customers, etc.);
2. Protecting company assets (e.g., premises, sales points, intellectual property, data, etc.);
3. Ensuring the continuity of our products/services at acceptable predetermined levels following an interruption;
4. Minimising the impact of potential disruptions (of any nature) on the activities of the Group;
5. Training the entire corporate workforce and spreading the culture of business continuity

¹ ISO 22300:2021 Security and resilience — Vocabulary

² The list of standards, guidelines and regulations used as programme references can be consulted in the document: *Business Continuity and Crisis Management Framework*

within the Group;

6. Confirming and strengthening Sisal's reputation, both nationally and globally.

Sisal measures the performance of the following business continuity activities:

- Management, update, and review of documentation;
- Training activities;
- Management, update, and review of business impact analyses;
- Third-party management and monitoring;
- Management, update, and review of business continuity plans and specialistic crisis plans;
- Tests and exercise sessions.

For further details on key performance indicators, please refer to the document "*Business Continuity Management System – KPP*".

The achievement of the activities relating to the KPIs is monitored in the Management Review.

5 ROLES AND RESPONSIBILITIES

The roles and responsibilities of the management system are described within the Business Continuity and Crisis Management Framework. The overall responsibility for business continuity and its effectiveness lies with the Chief Executive Officer of Sisal S.p.A., supported by the Risks & Compliance Committee and the Business Continuity Team that deals full-time with the management and implementation of the Business Continuity programme of the entire Group.

Business Units, both local and international, are responsible for proactively contributing to the programme by assisting the Business Continuity Team in activities related to their area of competence.

6 REVIEW AND MAINTENANCE

The review of the entire programme is carried out by the Business Continuity Team annually or following significant organizational changes; however, the business continuity management system is constantly monitored and improved to enhance its effectiveness and efficiency. Improvement is seen as a continuous process, to be implemented regardless of what has already been achieved.

7 REFERENCE DOCUMENTS

- Business Continuity and Crisis Management Framework;
- Business Continuity Management System - KPI.

8 ANNEX A: DEFINITIONS

TERM	DEFINITION
Business Continuity	Capability of an organisation to continue the delivery of products and services within acceptable time frames at predefined capacity during a disruption.
Business Continuity Management System	Part of the overall management system that establishes, implements, operates, monitors, reviews, maintains, and improves business continuity.
Business continuity programme	Ongoing management and governance process supported by the top management and appropriately resourced to implement and maintain business continuity management.
Organizational resilience	The ability of an organization to absorb and adapt in a changing environment.
Stakeholder	Subject or organisation that may influence, be impacted by, or have the perception of being impacted by a decision or activity.

9 ANNEX B: REGULATORY REFERENCE AND INTERNATIONAL STANDARDS

The business continuity management system of Sisal S.p.A. complies with the following standards/guidelines/regulations:

- Sisal's Group Code of Ethics and Conduct;
- Modello Organizzativo D.Lgs. 231/2001;
- Procedural systems of the Group's companies;
- Main international business continuity standards (ISO 22301, ISO 22313, ISO 22316, ISO 22317, ISO 22318);
- Main international crisis management standards (BS:11200, ISO 22361);
- Main international risk management standards (ISO 31000, ISO 31010);
- The Good Practice Guidelines of the Business Continuity Institute;
- EU Data Protection Regulation 2016/679 (art. 6, 7, 8, 9, 10, 11, 12 and 13) ("GDPR").