



# Responsible Marketing Policy

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## Introduction

### Purpose

With the aim of building a more responsible future, the Sisal Group has defined a path to sustainability in line with national and international best practices and has developed a framework capable of bringing together the various aspects on which the sustainability commitment is developed and the actions and initiatives that contribute to achieving the objectives of Sisal's 2030 Sustainability Agenda:

- Being a Leader in Responsible Gaming
- Being an Increasingly Innovative and Sustainable Company
- Providing an exemplary working environment

This Policy defines the guidelines for *Responsible Marketing* actions and strategies in compliance with the principles of responsibility and business ethics.

### Scope of application

This procedure applies at Group level. The Company, in relation to its role of guidance and coordination, may authorise each Group company to make partial application or proceed with a gradual implementation of these measures, subject to prior approval and taking into consideration the characteristics of each entity to which this Policy is addressed.



## **Responsibility for drafting and updating the Policy**

This Policy is approved by the Chief Institutional Affairs & Communication Officer on the proposal of the Corporate Communication & Sustainability Director and is subject to review in case of significant external events (e.g., changes in the reference regulatory framework) or internal events (e.g., changes in the internal organisational structure) which have an impact on the activities defined in the Policy.

Any amendments to the Policy follow the same approval procedure.



## General Principles

In managing its activities, the Sisal Group is committed to developing an ethical approach to business, intended as the set of behaviours and values that guide an individual's conduct within and towards the community. To do this, the Group operates in compliance with the standards and guidelines defined by the sector authorities and has defined an Organisational Model in line with these principles.

### Regulation of the sector

The safety and protection of the player are guaranteed in the first place by State regulations that constitute the basis of the Company's conduct as an authorised licence holder for the collection of legal games with cash winnings. In Italy, there is a legal reserve regime (Article 43 of the Constitution) on public gaming and, therefore, in order to carry out the activity of conducting a lawful game, a licence must necessarily be obtained from the State.

The regulation of the sector is under the responsibility of the Ministry of Economy and Finance and in particular of the ADM - *Agenzia delle Dogane e dei Monopoli* [Customs and Monopolies Agency] (hereinafter also abbreviated as ADM), which dictates the guidelines for the rational and dynamic development of the sector by verifying the compliance of the behaviour of the licence holders.

The ADM regulates the public gaming sector by means of preliminary, as well as ongoing, controls over the activities of the licence holders and targeted actions to combat irregularities. In addition, it exercises a monitoring role on the sector, also with reference to the assessment of industry-specific taxes.



As far as its subsidiaries are concerned, in full compliance with the regulations, the Group operates on the basis of licences granted by the competent authorities.

The Sisal Group is committed to combating illegal gaming as an integral part of its responsibility strategy and has adopted multiple strategies and policies to primarily protect the player.

In particular, the Sisal Group works side by side with trade associations and local authorities to create increasingly effective projects in the fight against illegal gaming, analysing and monitoring potential risks for the territory; through its close collaboration with ADM, the Group can guarantee the protection of customers, as well as the safety and transparency of gaming tools and offers.

### ***Prohibition of underage gambling***

Compliance with the regulations in force concerning the absolute prohibition of underage gambling is a fundamental pillar of the Sisal Group's commitment to promoting conscious and responsible gaming.

In fact, minors represent a category that requires high levels of control, and Sisal is constantly committed to building digital security systems and developing technologies and tools that are able to prevent access to the online gaming offer by anyone who is not an Italian citizen of legal age and in possession of a valid *codice fiscale* (i.e., the Italian tax identification number).

In the land-based channel, it is forbidden for Points of Sale to allow minors to enter specialised stores (betting shops) and to accept requests for gambling from minors in general points (bars and tobacco shops); in the event of doubt as to the age of the customer, the operator must ask for an identity document. In addition, in all rooms dedicated



exclusively to gaming, all gaming equipment and point-of-sale fittings must be visibly displayed, at the points of entry to the premises, with the glass banner bearing the prohibition of access and gaming for minors under the age of 18 and the words “Gaming is prohibited for minors and may cause pathological addiction”.

### **Internal Control System**

The Sisal Group has defined a set of rules, procedures and organisational structures that ensures that the company is run in a way that is sound, fair and consistent with the pre-set goals.

In particular, on the basis of the entry into force of Legislative Decree no. 231/2001 (hereinafter also the “Decree”), since 2006 the Sisal Group has drawn up and adopted an Organisational, Management and Control Model (hereinafter also the “Organisational Model”) aimed at reducing the risk of the offences envisaged by the Decree.

The Organisational Model consists of the following fundamental and interdependent elements:

- Code of Ethics
- Set of internal protocols, procedures and countermeasures to prevent the risk of crime
- Supervisory Board with the task of monitoring the suitability and effective implementation of the Organisational Model
- Map of powers conferred
- Penalty system

The Code of Ethics analyses and describes the general principles and modes of conduct in the performance of professional activities, transparency in accounting, the management of



IT systems and the confidentiality of personal data, and measures to protect health, safety and the environment.

Anyone may report any conduct that constitutes or may constitute a violation or inducement to violate laws and regulations, as well as the values and principles enshrined in Sisal's Code of Ethics and Code of Conduct, the Organizational Model and Company policies and procedures through Sisal's reporting channels, including the platform for receiving and managing reports, available in all the languages spoken in the Group<sup>1</sup>, managed by a third party with a view to guaranteeing independence. *For further details, see the documents "Sisal S.p.A. Code of Ethics" and "Sisal Whistleblowing Policy".*

With the aim of verifying points of sale's compliance with existing Licences, applicable national regulations and issued internal procedures, the Group conducts audit activities on direct and partner points of sale through the Internal Audit function. The Group also carries out mystery shopping activities, aimed at the timely and objective measurement of the compliance of the network of points of sale with respect to:

- the presence of information materials dedicated to the topic of responsible gaming and their visibility at the point of sale;
- the staff's response in handling problem gambling situations (level of knowledge of responsible gaming issues and possible referral to dedicated services following specific customer requests).

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<sup>1</sup> The platform is available at the following link: <https://sisal.integrityline.com/frontpage>. Reports can also be sent by post to the address: "Servizio Segnalazioni" Via Ugo Bassi, 6 - 20159 Milano.





## Responsible Marketing

Responsible marketing activities are carried out in the different areas in which the various company divisions operate:

- Product - Responsible Games Development
- Communication
- Training and awareness

The Group has therefore provided for activities in the areas described in the following sections.

### Product - Responsible Games Development

As part of its activities to develop solutions to protect its players, Sisal undertakes to create games that “by design” minimise the risk of generating gaming-related problems and also undertakes not to release games on the market that:

- are rationally and objectively capable of attracting the attention or interest of minors;
- may degrade the image or status of persons belonging to ethnic minorities, religious groups, gender, sexual orientation, political preferences or protected classes.

With the aim of achieving these objectives, the Group has defined a structured set of controls, applied to the processes of design, approval, development, testing and launch of new games; these controls apply to the launch of all new games and to substantial changes to existing ones.



In fact, the Sisal Group is committed to not releasing on the market products whose assessments have indicated a high level of gaming risk. In this regard, it has established a special Products Committee whose task is to request changes or the adoption of any additional mitigation actions in the event of critical elements. The Product Committee is chaired by the Leadership Team or their delegates.

The game design process and the measures taken in the area of Responsible Gaming are inspired by the highest international standards in the field.

*For more details, please refer to the document “Procedure for risk assessment of new games and modification of existing games”.*

## **Communication**

Since 2013, Sisal has had an internal policy for the commercial communication of games with cash winnings, which has been updated over the years in consideration of the regulatory changes made and which was reviewed in 2019 based on the provisions of the Dignity Decree (Decree-Law no. 87 of 12 July 2018, under the heading “Urgent provisions for the dignity of workers and businesses”, converted with amendments by Law No. 96 of 9 August 2018) and subsequent AgCom Guidelines.

All Sisal Group communications concerning gaming products or services with cash winnings are informative in nature, in full compliance with the regulations in force, with the aim of providing players with all the tools they need to make informed choices in order to protect the consumer and achieve a more effective fight against pathological gaming disorder.



The Sisal Group is committed, in its commercial communications, to avoid addressing or referring, even indirectly, to minors, in order to eliminate the risk of use and abuse by minors.

In accordance with the AgCom guidelines, Corporate Social Responsibility (hereinafter CSR) communications related CSR initiatives and on activities that do not concern games with cash winnings (e.g., *gaming for fun*) are foreseen. The messages are also submitted to the legal department for validation.

*For further details, please refer to the document “Policy for the commercial communication of games with cash prizes”.*

## **Training and awareness**

The Sisal Group offers a training course on Responsible Gaming, developed by the Responsible Gaming team and intended for all Sisal employees.

The compulsory training has the purpose of:

- defining the approach to Responsible Gaming and the actions taken to spread its culture;
- increasing the knowledge and awareness of all employees about problem gambling;
- dispelling prejudices and misconceptions related to gaming with cash winnings.

The Sisal Group is committed to planning and structuring information and training sessions on the use of our products, in the continuous promotion of safe and balanced gaming behaviour in all gaming channels.

Activities aimed at raising players' awareness are carried out at different levels:



### **RETAIL CHANNEL**

The network of points of sale plays a fundamental role in informing and raising awareness on safe and conscious gaming behaviour and is an important reference point for the player in the territory. A mandatory training course on Responsible Gaming dedicated to the distribution network is thus provided to the points of sale.

The course aims at:

- Presenting responsible gaming and the actions and projects undertaken to protect the player;
- Increasing retailers' knowledge and awareness of problem gambling;
- Introducing the laws and regulations enacted for playing safely;
- Providing guidance and tools for retailers to help safeguard their customers.

### **ONLINE CHANNEL**

All proprietary websites - corporate site, gaming site, information sites and retailer portal - have an articulated and in-depth section dedicated to Responsible Gaming to raise awareness among both players and all stakeholders. The contents of the section aim at:

- Promoting correct playing behaviour;
- Informing players about the probability of winning and prize structure;
- Providing services to support problematic players;
- Providing warnings on prohibited gaming for minors and detailed information on child protection initiatives.



## Certifications

One of the objectives of Sisal's Responsible Gaming programme is to constantly and transparently report and communicate the activities carried out and the results achieved; among other activities, the programme is periodically subjected to a certification process by independent external bodies that verify Sisal's actual commitment in activity planning, development and implementation.

In detail, the external bodies that currently certify Responsible Gaming processes are:

- **European Lotteries (EL):** an independent association that brings together more than 70 European state lotteries and gaming operators and is particularly committed to combating illegal gaming and ensuring a sustainable gaming offer.
- **World Lottery Association (WLA):** an organisation that represents the major gaming operators worldwide and supports the activities of its certified members, requiring a strong commitment to the highest standards of responsibility, particularly in relation to the principles of Responsible Gaming.

Consistent with the objective of spreading the culture of responsible gaming inside and outside the Company, the Group has implemented an exclusive and innovative point-of-sale certification project (issued by **ITALCERT**) that leads to the recognition of legal gaming establishments as a point of reference for consumers, with regard to responsible gaming issues. Specifically, in order to obtain certification on responsible gaming, the points of sale of the Sisal network must comply with all the prescriptions provided by the Group on responsible gaming. A phase of monitoring and improvement is also envisaged, during which Sisal carries out random Audits and Mystery Shopping at the points of sale, to verify actual compliance with the identified requirements and to implement any corrective actions.