



Sisal Code of Conduct for Third Parties



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Foreword

Founded in 1946 from the dream and intuition of three sports journalists as the first leading Italian company in the gaming sector as a State Concessionaire, Sisal, and all the companies forming its group (hereinafter the Sisal Company), manage a wide range of games, online and offline, including Lottery, Betting, Online gaming and Gaming Machine & Online Casino.

Over the years, Sisal has steadily grown, expanding its business to offer its customers a national and international gaming service.

The Sisal Company firmly believes that any economic and entrepreneurial initiative, whether public or private, including its own, cannot disregard the recognition, sharing and concrete application of those moral values and ethical principles that represent the real foundations of any civil society.

Respect for **human rights, labour rights** (understood as the recognition of workers' rights, e.g. with reference to health and safety in the workplace, guaranteed minimum wage, maximum number of working hours, freedom of association and collective bargaining, combating all forms of forced and child labour, acceptable working conditions, condemnation of all forms of discrimination, providing for disciplinary action in the event of non-compliance), the **environment** (understood as the obligation to adopt a preventive approach with initiatives aimed at raising awareness of environmental issues and the development of technologies that respect the environment), the prevention of **corruption** in relations between private individuals and with the public administration, compliance with **information security** and **privacy** measures, as well as the commitment to **responsible gaming**, represent some of the principles on which Sisal has decided to base its business with all the parties involved (Workers, Suppliers, Customers and Third Parties).

The abovementioned principles, in addition to those of legality, business ethics, loyalty, fairness, transparency and meritocracy, are, moreover, already referred to in the major universally recognised international conventions, such as ILO conventions, UN Global Compact, the Framework Convention on Climate Change, the OIL Convention on Child Labour, the Universal Declaration of Human Rights, the Organisation for Economic Cooperation and Development and the Voluntary Principles on Security and Human Rights, and by which Sisal draws inspiration in drafting its policies and procedures.

In addition to these conventions and/or declarations, Sisal, for the aspects of fighting and combating crimes, has adopted a **Code of Ethics and an Organisational Model pursuant to Legislative Decree 231/2001** (available in the dedicated section of the institutional website,



by clicking [here](#)), as well as the **Anti-Corruption Policy** (available in the dedicated section of the institutional website, by clicking [here](#)).

Sisal firmly believes in all the principles mentioned above and subsequently recalled in this code, which serve as the context in which it has chosen to operate. Consequently, its concrete implementation is required of all parties involved (stakeholders) and, in particular, of all third parties who wish to entertain any business relationship with it.

1. Legality, fairness, transparency, loyalty and ethics.

The values and principles on which Sisal created its business model are **respect for the law, fairness, transparency, loyalty and ethics**.

It follows that every relationship Sisal has with all third parties is characterised by high ethical standards that respect all parties involved.

In labour relations, with its own people, and in business relations, with customers, suppliers, public authorities and judicial authorities, Sisal promotes a fair and truthful dialogue that prevents undue economic and/or competitive advantages.

It follows that third parties that collaborate with Sisal must pursue the highest standards of legality and ethics, with a corresponding contrast to forms of favouritism, deceptive and illegal practices and/or collusive practices aimed at altering the market.

2. Human Rights

As mentioned in the introduction, Sisal pays great attention to the civil rights of all parties involved in its business model.

The concepts of **equality, without discrimination** of gender, political opinion, ethnicity, nationality, language, religion, ensuring fair working conditions and the expression of personal freedom are basic principles according to which Sisal steers its business model.

It follows that any action, conduct or business model that entails the violation of the aforementioned rights, and that concretely endangers the lives and personal freedoms of all parties involved, is prohibited.

In the event of an incident involving an offence, whether civil and/or criminal, Sisal and the third parties with which it establishes business relations shall cooperate with all the authorities and law enforcement agencies to remedy the situation.

3. Right to work

In line with the highest international treaties on the concept of fair working conditions, Sisal has devised a respectful and fair workplace for its employees.



The third parties with which Sisal collaborates share principles and practices aligned with those of Sisal described below.

3.1. Working conditions

In fulfilment of this principle, every employment relationship is based on a contract in which **fair and clear working conditions, remuneration** and **fair working hours** (e.g. parental leave and flexible forms of work compatible with personal and life needs) are set out. Constant and constructive dialogue with trade union representatives is also promoted in order to monitor workers' demands and expectations.

3.2. Combating child labour and forced labour

Sisal prohibits and opposes any form of child exploitation and/or forced labour from which either an economic advantage or criminal behaviour may result.

3.3. Occupational health and safety

Sisal pays great attention to **health and safety in the workplace**. This is why it has set up an adequate system of controls and supervision as required by the regulations applicable in each jurisdiction in which it operates.

All personnel are provided with **training sessions** aimed at raising awareness of this issue and adopting all behaviours necessary to identify and mitigate risks.

In addition to this preventive training, for all workers who are contractually assigned to special tasks, **Sisal also provides all material** (clothing, personal protective equipment, etc.) **to reduce risks and hazards**.

Sisal's focus on this issue is confirmed by obtaining the **UNI:ISO 45001 occupational health and safety management system** certification.

3.4. Combating harassment

Sisal opposes any form of harassment in the workplace, understood as repeated and persistent hostile conduct that may violate personal dignity, creating an intimidating, degrading, humiliating or offensive atmosphere. Where disrespectful, discriminating and demeaning conduct is detected, Sisal will take all measures to counter and prevent episodes of this nature, up to and including taking disciplinary action against those who have engaged in such conduct.

3.5. Development and meritocracy

Sisal believes in a **dynamic, stimulating and meritocratic working environment**, and has adopted criteria of merit, competence and, in any case, strictly professional criteria for any decision relating to its people. This is why Sisal has, for example, put in place a selection and



recruitment process that is carried out according to objective and impartial criteria with the aim of assessing the real skills of candidates and assigning them to functions according to their real capabilities.

Moreover, Sisal invests in the **training** and professional development of its people in order to guarantee them the skills they need to perform their activities efficiently and safely. In fact, in addition to the mandatory training required by law, Sisal guarantees all workers adequate training with the aim of improving their skills in relation to the tasks to be performed.

Lastly, Sisal offers all its people **opportunities for professional growth**, ensuring that everyone enjoys fair treatment based on merit criteria, without any discrimination and guaranteeing equal opportunities. Sisal has therefore implemented a system of interim assessments aimed at evaluating the skills acquired by its people over time to assess possible career advancement.

3.6. Diversity and inclusion

Sisal ensures **dignity and impartial treatment** for all those involved in its activities, promoting diversity and inclusion within its organisation and undertaking to guarantee a working environment free from any form of discrimination or abuse of power.

Furthermore, Sisal is committed to treating all persons with **respect and dignity, without discrimination or prejudice of any kind**, whether based on race, nationality, age, gender, gender identity, sexual orientation, ethnicity, religion, physical or economic condition or political opinion.

Sisal also obtained **gender equality certification** in accordance with PdR 125:2022.

Sisal does not tolerate discriminatory or offensive behaviour and we encourage the **reporting** of such incidents to Human Resources or through the use of dedicated channels.

4. Ethics in business management

4.1. Relations with customers and suppliers

Sisal pursues the Group's success through the **offer of quality products and services**, in compliance with the regulations **protecting fair competition**. It builds relationships of trust with its customers, to meet their expectations, maintaining high levels of quality, innovation, performance, safety and reliability. Sisal communicates accurate and exhaustive information about its products and services so that customers can make informed decisions, in full respect of the **principles of transparency** and **confidentiality**, in line with the provisions



of the **Consumer Code** and the internal regulatory instruments on the subject, as well as in compliance with **privacy** protection regulations.

Sisal believes that its **bond with suppliers** is a fundamental aspect of its business, by which it is able to guarantee the quality and sustainability of its products. It therefore pays particular attention to establishing and managing contractual relations with suppliers, requiring **compliance with its principles** and committing to maintaining an **honest and transparent relationship** with them. It has therefore adopted an extensive system of internal procedures for the selection and management of relations with suppliers.

Third parties collaborating with Sisal share the same values and have adopted similar procedural systems.

4.2. Protection of competition

The protection of competition is a fundamental principle for the proper functioning of the market and the safeguarding of consumers' interests. Sisal operates in accordance with the principle of legality and in compliance with the laws and regulations in force in the jurisdictions in which it carries out its activities.

Therefore, Sisal protects the **value of competition** in every jurisdiction in which it operates in order to sustain a competitive market, avoids conduct that may limit free competition in compliance with **antitrust regulations** and internal regulatory instruments on the matter, and opposes **commercial practices** that may constitute a violation of competition laws.

These commitments are also implemented through the third parties with which Sisal collaborates, so they comply with these principles and practices.

4.3. Relations with Public Administration, Institutions and Supervisory Authorities

Sisal acts with loyalty, correctness and transparency in its relations with the Public Administration, with Institutions and with the Supervisory Authority, as well as in its relations with any public official and person in charge of a public service.

Sisal collaborates actively, loyally and transparently with the **Public Administration, Institutions and the Supervisory Authority**, offering the utmost cooperation and availability. **At Sisal, we do not offer money, gifts, entertainment, valuables or other benefits to any public official or person in charge of a public service** for the purpose of obtaining, retaining or securing a business or commercial advantage (whether proper or improper) or in connection with decisions that may be seen as favourable to the interests of the Group's business, in compliance with the Anti-Corruption Policy and the internal regulatory instruments on the subject.



At Sisal, we always avoid political involvement on behalf of Sisal, and we do not make contributions, directly or indirectly and in any form, neither to parties, movements, committees and political and trade union organisations nor their representatives and candidates

Third parties collaborating with Sisal share the same values and have adopted similar procedural systems.

4.4. Fighting corruption and combating money laundering and terrorist financing

Sisal believes that corruption represents a threat to integrity as well as to the ability to provide high quality products and services to customers and business partners. Therefore, it acts against any form of corruption, preventing it from representing an obstacle to its development.

“Corruption” is defined as any promise, offer, request or acceptance of an advantage, benefit, money or economic value for a person as an **inducement or reward to act or not to act** in connection with that person's performance of his or her duties in **violation of applicable law**. Corrupt acts also include:

- payments of small value that are unlawful or even unofficial and contrary to good morals, aimed at securing a due service;
- the offer or acceptance of money by the organisation's personnel in pursuit of their own direct benefit.

In order to prevent and combat the phenomenon of corruption, Sisal has adopted an **Anti-Corruption Policy** and requires all personnel, on an annual basis, to issue a declaration attesting to their compliance with it. The latter is available at the following [link](#).

In addition, Sisal has implemented the **UNI:ISO 37001 management system for the prevention of corruption**.

Third parties that collaborate with Sisal are required to have adopted similar policies and procedures, and/or implemented instructions to their directors, employees and collaborators aimed at preventing corrupt conduct, even attempted, and at promoting a culture of integrity in their own organisation and to oblige Sisal to maintain them all effectively implemented for the entire duration of the collaboration, undertaking to fully comply with the principles of the Code of Ethics and the Anti-Corruption Policy.

In the event that a corrupt incident is detected and/or discovered, Sisal, in addition to cooperating with the competent judicial authorities, takes all disciplinary measures against the persons involved.



Furthermore, Sisal considers it fundamental to **prevent and combat money laundering**, terrorist financing and the reuse of illicit proceeds. It therefore promotes **transparency** in the management of the Group's activities and works only with **reliable counterparties**, complying with both national and international regulations and provisions on anti-money laundering and terrorist financing.

Third parties with which Sisal cooperates favour the performance of activities in accordance with internal and external regulations and adopt similar procedural systems.

4.5. Management of free gifts

In compliance with the principle of fairness and transparency, and in order to prevent corrupt conduct, Sisal has regulated the receipt and disbursement of gifts.

At Sisal, we do not accept or offer any kind of gift, favour, payment or other form of **personal or improper advantage that could compromise our independence** or that of third parties. Furthermore, we do not accept or offer cash or cash equivalents, gifts of an inappropriate nature or that could harm the Group's reputation.

All employees are **expressly forbidden to accept gifts** from third parties **in excess of 150 Euros**.

Third parties cooperating with Sisal may not give out gifts worth more than this amount.

4.6. Conflict of Interest

Sisal operates in such a way as to ensure that everyone avoids any situation in which a conflict of interest may arise that could interfere with their ability to make decisions impartially and in full compliance with the principles of legality, loyalty, fairness and transparency.

A **conflict of interest** arises when a **personal interest**, even of a non-economic nature, could influence a person's **decisions** or **conduct** in the context of his or her **work**, generating an immediate or future **advantage** for **himself** or **herself**, **family members** or **other persons with whom he or she** has close **personal** or **business relations**.

In compliance with the correct principles of a transparent business relationship, everyone is explicitly requested and urged to refrain from any form of transaction that may entail, by virtue of their role within the company, a potential conflict of interest to the detriment of some parties and to the advantage of others.

By virtue of the delicacy, and importance of the issue, Sisal pays great attention, as early as the recruitment stage, by making explicit statements on work situations that may generate a future conflict of interest.



Third parties collaborating with Sisal are required to declare the non-existence of conflicts of interest, and/or promptly report conflict situations, even potential ones, existing or that may arise in the course of the relationship with Sisal to the Compliance Function for the Prevention of Corruption (Funzione-Anticorruzione@sisal.it).

4.7. Whistleblowing

Sisal has adopted a **Whistleblowing Policy** (available at the following [link](#)) that regulates the activities of receiving and handling whistleblowing reports in compliance with the requirements of national and international whistleblowing regulations.

Furthermore, in order to prevent and counter unlawful conduct not in line with its values, Sisal has put in place an **independent system** for receiving and managing reports.

Sisal management and all employees are encouraged and required to report any conduct, also ommissive, that constitutes or may constitute a breach or inducement to a breach of laws and regulations, as well as of the values and principles enshrined in Sisal's Code of Ethics and Code of Conduct, Model 231 or company policies and procedures.

In order to facilitate the receipt of reports, Sisal has set up the following communication channels accessible to all Sisal employees and stakeholders, in particular:

- access to the Speak Up! platform ([link](#));
- regular mail, to the address: "Servizio Segnalazioni" Via Ugo Bassi, 6 -20159 Milan.

Third parties who become aware of a breach, even a potential breach, may use the abovementioned notification channels to report what has occurred.

Regardless of the notification channel used, the **protection and confidentiality of the identity of the Whistleblower and of the Reported Party** is always guaranteed, their data being processed in accordance with the law and all useful measures being taken. Sisal accepts anonymous reports, where required by law.

It is essential for Sisal to **protect Whistleblowers**, therefore **retaliatory or discriminatory acts**, direct or indirect, against the Whistleblower for reasons directly or indirectly linked to the report are **forbidden** and sanctioned.

4.8. Transparency of information

Sisal is aware of the importance of accurate, consistent and strategic communication towards our stakeholders, in order to promote the Group's products and services and to provide adequate accounting information in line with the criteria indicated by law.



All actions, operations and negotiations carried out and, in general, **the conduct implemented in the performance of their activities must be inspired by the utmost fairness and integrity** in terms of management, completeness and transparency of information, legitimacy in formal and substantive terms, and clarity and truthfulness in accounting records in accordance with current regulations and internal procedures.

Adequate documentation must also be kept to support each transaction, so as to allow for easy and timely bookkeeping and accurate reconstruction of the transaction.

Should any **information**, even sensitive **information**, become known in the course of activities, it shall not be disclosed without **prior authorisation** from Sisal and shall be treated in accordance with **confidentiality agreements**.

4.9. Protection of industrial and intellectual property

Sisal acts in full respect of **industrial and intellectual property rights**, as well as of the laws, regulations and conventions, also at EU and/or international level, protecting such rights. Third parties that collaborate with Sisal are subject to the same obligations.

5. Community relations

5.1. Wagering Policy

For Sisal, guaranteeing the integrity of its products, promoting responsible and transparent gaming inspired by the principles of fairness, are essential factors as well as objectives of primary importance in conducting business, consistent with the Group's corporate purpose and values, codes of conduct and sustainability strategy.

Sisal has therefore adopted a Wagering Policy that establishes the **prohibition** for Sisal personnel, as well as collaborators, temporary staff and interns who have an effective possibility of **acting on the integrity of the games themselves** (e.g. by exploiting their technical knowledge, company tools and position to obtain personal financial advantages), **to carry out gaming activities**.

This obligation extends to third parties that collaborate with Sisal, if in the course of their activities they may gain access to information or knowledge that could allow the integrity of the game to be jeopardised.

Moreover, as a general principle, Sisal prohibits the owners and collaborators of the Company's Points of Sale managed through third parties from carrying out gaming activities on amusement and entertainment machines provided for by Article 110, paragraph 6, of the T.U.L.P.S. [Consolidated Law on Public Security] (AWP and VLT machines), on online games and on horse racing and sports betting offered by the Company.



5.2. Combating illegal gaming activity, responsible gaming and the protection of minors

Sisal considers the **fight against illegal gaming activity** as a fundamental element to ensure legality and transparency in the sector, as well as to **protect consumers** from the risks of gaming addiction and fraud.

In addition, Sisal is committed to ensuring that the gaming experience for all players is one of **responsible fun**: this means intercepting and responding promptly to the different needs of players and promoting a **culture of safe gaming** away from excesses.

Furthermore, **Sisal prohibits gaming activity by minors under the age of 18**. To this end, it gives precise instructions to the entire sales network not to accept gaming requests from minors and provides visibility of this prohibition in all communications.

Third parties collaborating with Sisal guarantee the same commitments.

5.3. Respect for the environment

Sisal is committed to reducing the environmental impact of its activities, for example by using certified energy from renewable sources, purchasing paper from certified supply chains and reducing waste of natural resources.

Sisal is constantly committed to **safeguarding natural resources** and pursuing **their sustainable use** in the company's value chain, in order to prevent pollution, reduce waste and facilitate recycling and recovery.

Sisal constantly strives to develop **energy efficiency initiatives** in order to reduce energy consumption and emissions.

Sisal **makes its people aware of the importance of environmental protection** and provides them with information and suggestions on how to adopt more sustainable behaviour.

Sisal involves its suppliers in its decarbonisation journey in the most effective ways.

Sisal raises awareness among sales network managers to adopt solutions and behaviours to reduce energy consumption at points of sale.

Most recently, Sisal has implemented **management systems for the environment, UNI:ISO 14001**, and **for energy, UNI:ISO 50001**.

Sisal requires that the third parties it works with share these values and we have taken measures to protect the environment.

6. Information security and privacy

6.1. Privacy Protection and Data Ethics

Sisal is committed to putting the care of data and the protection of the privacy of employees, customers and third parties, generated or acquired in business relations, first. It



adopts fair and correct practices regarding the method, type and purpose of collecting and processing personal data, as well as respecting maximum transparency.

In particular, in Sisal:

- **We design and implement our products and services in compliance with the applicable regulatory requirements for privacy by design** in order to ensure adequate measures in terms of personal data protection.
- **We process personal data in compliance with internal and external privacy principles and regulations**, ensuring, among other things, minimisation, limitation of storage, use for specific, specified and transparent purposes and control at any time.
- **We adopt fair and equitable practices**, the aim of which is to minimise discrimination and penalising or unequal treatment.
- **We ensure a high level of transparency and clarity** regarding the manner, type and purpose of the collection and processing of personal data on the channels, products and services provided to customers.
- **We monitor the level of privacy compliance of third parties through contractual clauses as well as by carrying out periodic audits**, in order to ensure the correct processing of personal data throughout the supply chain.

Third parties with which Sisal establishes business relations share these principles and implement similar procedures.

6.2. Information Security

Sisal considers the protection of corporate information assets and the management of ICT and security risks, including cyber risks, to be objectives of primary importance. It therefore works to achieve their pursuit with a view to continuous improvement.

In particular, in Sisal:

- **We provide central security governance** to preserve confidentiality, integrity and availability of corporate information assets.
- **We promote innovation in security** in order to ensure constant alignment with technological developments and the use of innovative methods, processes and solutions.
- **We ensure compliance with applicable laws, regulations and standards** that affect information security, as well as with specific contractual agreements with various stakeholders.

- **We promote the adoption of a risk-based approach** as regards adopting security measures through the use of a framework integrated into the overall corporate risk management model.

In addition, Sisal has implemented the **UNI:ISO 27001 Information Security Management System** and the **UNI:ISO 22301 Business Continuity Management System**, as well as **WLA-SCS Certification for the Information Security Management System - Gaming Sector**.

Third parties with whom Sisal establishes business relations, share these principles and implement similar procedures, as well as complying with security provisions concerning information exchanged and managed in the context of activities carried out with and/or for Sisal.

7. Training and Communication

At Sisal we consider the Code of Ethics and Conduct a fundamental document for the success of all our activities. We therefore undertake to share it with all our stakeholders and promote its correct distribution and implementation, also through the adoption of measurable indicators. We also ask third parties who work with us to comply with this Code of Conduct and participate in the training sections provided. We also ask them to adopt similar practices and procedures in order to support the creation of a culture of legality and oriented towards responsible and sustainable business.