Code of Conduct for Third Parties

Version 4.0
February 2026

1 TABLE OF CONTENTS

Foreword

Founded in 1946 from the vision and intuition of three sports journalists as the first Italian company in the gaming sector operating as a State Concessionaire, Sisal S.p.A. – together with all the companies within its group (hereinafter "Sisal") – manages a wide range of gaming products, both online and offline, including Lottery, Betting, Online Gaming, and Gaming Machines & Online Casino.

Over the years, Sisal has grown steadily, expanding its business and offering customers national and international gaming services. In particular, since August 4, 2022, Sisal has been part of Flutter Entertainment plc, the world's largest online sports betting and iGaming operator, with a portfolio of globally recognized brands and listed on the London Stock Exchange (FTSE) and the New York Stock Exchange (NYSE).

As of January 1, 2025, Sisal leads Flutter Southern Europe & Africa (hereinafter "Flutter SEA"), a multi-brand and multi-country ecosystem operating in:

- Italy, with a broad range of products spanning lotteries, betting, gaming machines, and iGaming, through the brands Sisal, PokerStars (managed by TSG Italy S.r.l., wholly owned by Sisal S.p.A.), and SNAI (brand of Snaitech S.p.A., which joined the Group in 2025 along with the Milan and Montecatini Terme racetracks and the TV channel EQtv, managed by epiqa S.r.l.);
- Morocco, offering a portfolio of lottery and betting products, both online and retail, managed respectively by Sisal Loterie Maroc S.a.r.l. (lotteries) and Sisal Jeux Maroc S.a.s. (betting);
- Turkey, where it provides a lottery offering distributed online and through retail outlets via Sisal Şans.

Flutter SEA is supported by Tech Hubs located in Tirana, Istanbul, Naples, and Palermo, as well as the Innovation Lab in Turin, which fosters innovation through scouting, research, and idea incubation in collaboration with universities, research centers, and start-ups. The Tech Hub in Tirana is managed by Sisal Albania Sh.p.k., while the Istanbul hub is operated by Sisal Technology Turkey.

Flutter SEA 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 workers' health and safety in the workplace, guaranteed minimum living wages, maximum working hours, freedom of association and the right to collective bargaining, combating all forms of child and forced labour, , non-discrimination, providing for disciplinary practices 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 Flutter SEA 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 International Labour Organization (ILO) conventions (e.g., the ILO conventions on child labour, such as the Minimum Age Convention and the Worst Forms of Child Labour Convention, and on forced labour, such as the Forced Labour Convention and the Abolition of Forced Labour Convention), UN Global Compact, the Framework Convention on Climate Change, , 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 Flutter SEA draws inspiration in drafting its policies and procedures.

In addition to these conventions and/or declarations, Flutter SEA, for the aspects of fighting and combating crimes, has adopted a **Code of Ethics and an Organisational Model pursuant to Legislative Decree 231/2001 (where applicable)**, as well as the **Anti-Corruption Policy**, which are available in the dedicated sections of the institutional websites www.sisal.com and www.snaitech.it.

Flutter SEA 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 of all third parties who wish to entertain any business relationship with it.

Flutter SEA reserves the right to conduct on-site audits of its third parties in order to verify compliance with the requirements of this Code. Unless otherwise agreed contractually, such audits may be carried out with or without prior notice and may include the review of documentation, staff interviews, and the assessment of processes and working environments in relation to all the topics covered in this document.

1. Legality, fairness, transparency, loyalty and ethics

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

It follows that every relationship Flutter SEA 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, Flutter SEA promotes a fair and truthful dialogue that prevents undue economic and/or competitive advantages.

It follows that third parties that collaborate with Flutter SEA 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, Flutter SEA pays great attention to the civil rights of all parties involved in its business model and is committed to prevent violations of human rights across its suppliers' operations.

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 Flutter SEA 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, Flutter SEA 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, Flutter SEA has devised a respectful and fair workplace for its employees.

The third parties with which Flutter SEA collaborates share principles and practices aligned with those of Flutter SEA 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** aligned with minimum living wages and **maximum working hours** (e.g. parental leave and flexible forms of work compatible with personal and life needs) are set out in order to guarantee acceptable living conditions. Flutter SEA commits not to use non-regular employment (fixed-term contracts, contracted labour) excessively and to provide regular employment (permanent and direct) to every extent possible. It is respected the maximum and minimum working hours threshold as per each country labour-specific provisions. Working hours shall always comply with the applicable national legislation, collective agreements, and international standards. In all cases, employees are entitled to at least one day of rest every seven days. Unless stricter limits are set by national laws or agreements, the following global standard applies: a maximum of 60 hours of work per week (48 regular hours and a maximum of 12 hours of voluntary overtime). In Italy, Morocco, Albania and Turkey, where local legislation establishes stricter working time requirements (e.g. 40–45 hours of regular work and reduced limits on overtime), such provisions shall prevail. Flutter SEA also sustains freedom of association and the right to collective bargaining. Constant and constructive dialogue with trade union/employees' representatives is promoted to monitor workers' demands and expectations. Where freedom of association and collective bargaining in situations where they are limited or not required by law, Flutter SEA undertakes to facilitate them, introducing measures suitable for this purpose (for example, informal spaces for dialogue, works committees, adoption of voluntary company standards).

3.2. Combating child and forced labour

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

3.3. Workers' health and safety

Flutter SEA pays great attention to workers' **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, **Flutter SEA also provides all material** (clothing, personal protective equipment, etc.) **to reduce risks and hazards**.

Flutter SEA's focus on this issue is evident from the fact that some of its member Companies have obtained the **UNI:ISO 45001 occupational health and safety management system** certification.

3.4. Combating harassment

Flutter SEA 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, Flutter SEA will take all measures to counter and prevent episodes of this nature, up to and including taking disciplinary practices against those who have engaged in such conduct.

3.5. Development and meritocracy

Flutter SEA believes in a **dynamic, stimulating and meritocratic working environment**, and has adopted criteria of merit, competence, non-discrimination and, in any case, strictly professional criteria for any decision relating to its people. This is why Flutter SEA 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, Flutter SEA invests in the **training** and professional development of its people 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, Flutter SEA guarantees all workers adequate training with the aim of improving their skills in relation to the tasks to be performed.

Lastly, Flutter SEA 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. Flutter SEA 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

Flutter SEA ensures **dignity, non-discrimination 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.

With specific reference to migrant workers, Flutter SEA does not charge hiring costs, nor does it withhold any personal identity documents, and makes written contracts available in a language understood by the workers.

Furthermore, Flutter SEA is committed to treating all individuals with respect and dignity, without discrimination or prejudice of any kind, whether based on **race, nationality, age, sex, gender identity, sexual orientation, ethnicity, religion, physical or economic conditions, or political opinions**. This principle applies at all times and in every context of working life, including recruitment, promotion, and compensation decisions, ensuring equal opportunities for all employees.

Some Flutter SEA member companies have also obtained **gender equality certification** in accordance with UNI/PdR 125:2022 standard.

Flutter SEA does not tolerate discriminatory or offensive behaviour, and we encourage the **reporting** of such incidents to Human Resources or using the dedicated channels.

3.7. Disciplinary practices

Flutter SEA applies disciplinary sanctions against employees who act in breach of what is established in internal policies and procedures, as well as in violation of Flutter SEA principles and applicable law. Such disciplinary practices are established in compliance with laws and regulations and considering the applicable employment contract. Flutter SEA does not apply wage deductions as a disciplinary measure. In accordance with applicable labour laws and any relevant contractual agreements, however, Flutter SEA may apply a financial penalty clause in the event of serious violations of corporate policies and procedures, applicable laws, and regulations, or of the duties of diligence, obedience and loyalty that characterize the employment relationship. Third Parties are expected to adopt similar fair practices.

Under no circumstances will Flutter SEA apply corporal punishment, which is strongly condemned.

4. Ethics in business management

4.1. Relations with customers and suppliers

Flutter SEA 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. Flutter SEA 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 **current applicable consumers' laws** and the internal regulatory instruments on the subject, as well as in compliance with **privacy** protection regulations.

Flutter SEA believes that its **bond with suppliers** is a fundamental aspect of its business, by which it can 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 Flutter SEA 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. Flutter SEA 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, Flutter SEA protects the **value of competition** in every jurisdiction in which it operates 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 Flutter SEA collaborates, so they comply with these principles and practices.

4.3. Relations with Public Administration, Institutions and Supervisory Authorities

Flutter SEA 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.

Flutter SEA collaborates actively, loyally and transparently with the **Public Administration, Institutions and the Supervisory Authority**, offering the utmost cooperation and availability.
At Flutter SEA, 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 Flutter SEA, we always avoid political involvement on behalf of Flutter SEA, 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 Flutter SEA share the same values and have adopted similar procedural systems.

4.4. Fighting corruption and combating money laundering and terrorist financing

Flutter SEA 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:

5

- 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.

To prevent and combat the phenomenon of corruption, Flutter SEA 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 in the relevant section on the institutional websites www.sisal.com and www.snaitech.it.

In addition, some Flutter SEA member companies have implemented the **UNI:ISO 37001 management system for the prevention of corruption.**

Third parties that collaborate with Flutter SEA 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 Flutter SEA 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.

If a corrupt incident is detected and/or discovered, Flutter SEA, in addition to cooperating with the competent judicial authorities, takes all disciplinary practices against the persons involved.

Furthermore, Flutter SEA 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 Flutter SEA cooperates favour the performance of activities in accordance with internal and external regulations and adopt similar procedural systems.

4.5. Management of gifts and hospitalities

In compliance with the principle of fairness and transparency, and to prevent corrupt conduct, Flutter SEA has regulated the receipt and disbursement of gifts and hospitalities.

At Flutter SEA, we do not accept or offer any kind of gift, hospitality, 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. Indeed, we have established **monetary limits for gifts and hospitality** that apply to the various Flutter SEA companies based on the country in which each entity operates, as detailed below.

In particular, all employees are **expressly forbidden to accept gifts and hospitalities** from third parties **more than:**

- **150 € in Italy;**
- **120 € for Sisal Sans (Türkiye);**
- **150 € for Sisal Technology Turkiye Hub (Türkiye);**
- **800 dirhams in Morocco;**
- **5.000 lekë in Albania.**

Furthermore, the total value of gifts and/or hospitalities received during the year from the same third party **cannot exceed the amount of:**

6

- **600 € in Italy;**
- **480 € for Sisal Sans (Türkiye);**
- **600 € for Sisal Technology Turkiye Hub (Türkiye);**
- **3.200 dirhams in Morocco;**
- **20.000 lekë in Albania.**

Third parties who collaborate with Flutter SEA, therefore, commit to not give gifts and/or hospitalities to Flutter SEA employees for a value greater than these amounts.

4.6. Conflict of Interest

Flutter SEA 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 occurs when a personal or self-serving interests could directly or indirectly compromise the judgement, decisions, or actions when working for or with Flutter SEA. Such interests hold the potential to make it difficult to perform objectively and effectively on behalf of Flutter SEA.

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, Flutter SEA 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 Flutter SEA 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 during the relationship with Flutter SEA.

Such reports must be submitted during the onboarding process or, alternatively, can be sent via email to the Compliance Functions of the various Companies that make up Flutter SEA at the following addresses:

- funzione-anticorruzione@fluttersea.com for Italian Companies:
    - Sisal S.p.A.
    - Sisal Italia S.p.A.
    - Sisal Gaming S.r.l.
    - TSG Italy S.r.l.
    - Snaitech S.p.A.
    - Epiqa S.r.l.
    - Snai Rete Italia S.r.l.
    - U4line S.r.l.
    - Snaitech Smart Technologies S.r.l.
    - Fondazione Snaitech
- compliance@sisalsans.com for Sisal Sans (Turkey);
- compliance_sisaltechturkey@sisal.com for the Sisal Tech Turkey Hub (Turkey);
- sinjalizime@sisal.al for the Sisal Albania Hub (Albania);
- anticorruption@slm.ma for Sisal Loterie Maroc (Morocco);
- privacy@sjm.ma for Sisal Jeux Maroc (Morocco).

4.7. Whistleblowing

Flutter SEA has adopted a **Whistleblowing Policy** (available at the following link on www.sisal.com and and at the following link on www.snaitech.it) that regulates the activities of receiving and handling whistleblowing reports in compliance with the requirements of national and international whistleblowing regulations.

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

Flutter SEA management and all employees are encouraged and required to report any conduct, also omissive, 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 Flutter SEA's Code of Ethics and Code of Conduct, Model 231 (where applicable) or company policies and procedures.

To facilitate the receipt of reports, Flutter SEA has set up the following communication channels accessible to all Flutter SEA employees and stakeholders, in particular:

- access to the Speak Up! platform (link) (available in many different languages);
- registered telephone line/recorded voice messaging system accessible 24/7;
- direct meeting with the Whistleblowing Committee, i.e., the body responsible for managing reports, with the possible involvement of the Supervisory Body ("Organismo di Vigilanza") in the case of relevant reports pursuant to Legislative Decree 231/2001 where applicable (in case of reports coming from suppliers, held outside of supplier site).

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. Flutter SEA accepts anonymous reports, where required by law.

It is essential for Flutter SEA 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

Flutter SEA is aware of the importance of accurate, consistent and strategic communication towards our stakeholders, 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 supporting each transaction, to allow for easy and timely bookkeeping and accurate reconstruction of the transaction.

Should any **information**, even sensitive **information,** become known during activities, it shall not be disclosed without **prior authorisation** from Flutter SEA and shall be treated in accordance with **confidentiality agreements**.

4.9. Protection of industrial and intellectual property

Flutter SEA 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 Flutter SEA are subject to the same obligations.

5. Community relations

5.1. Wagering Policy

For Flutter SEA, guaranteeing the integrity of its products and 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.

Flutter SEA has therefore adopted a Wagering Policy that establishes the **prohibition** for Flutter SEA 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 Flutter SEA, if during their activities they may gain access to information or knowledge that could allow the integrity of the game to be jeopardised.

Furthermore, also in compliance with the law in force, it is forbidden for the owners of the Point of Sales, their family members (by this meaning the spouse, first and second degree relatives and first degree in-laws, as well as any further family members, including different degree and affinity, if living with the owner), cohabitants and employees to open gaming accounts on Flutter SEA websites and carry out gaming activities on amusement and entertainment machines (AWP and VLT machines) and on betting horse racing and sports offered by the Company.

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

Flutter SEA 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, Flutter SEA 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, **Flutter SEA 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 Flutter SEA guarantee the same commitments.

5.3. Respect for the environment

Flutter SEA 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.
Flutter SEA is constantly committed to **safeguarding natural resources** and pursuing **their sustainable use** in the company's value chain, to prevent pollution, reduce waste and facilitate recycling and recovery.
Flutter SEA constantly strives to develop **energy efficiency initiatives** to reduce energy consumption and emissions.
Flutter SEA **makes its people aware of the importance of environmental protection** and provides them with information and suggestions on how to adopt more sustainable behaviour.

Flutter SEA involves its suppliers in its decarbonisation journey in the most effective ways.

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

Most recently, some Flutter SEA member Company have implemented **management systems for the environment, UNI:ISO 14001,** and **for energy, UNI:ISO 50001**.

Flutter SEA 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

Flutter SEA 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 Flutter SEA:

- we have adopted a **governance model** aimed at defining and monitoring the supervision, commitment and responsibilities and strengthening the ethics, compliance and sustainability of our products and services, which are always designed and implemented in compliance with the applicable requirements and in a **privacy by design and default** perspective, in order to ensure adequate measures in terms of personal data protection.
- we adopt **fair and correct** practices, the objective of which is to **minimize discrimination and penalizing or non-impartial processing**.
- we process personal data in compliance with privacy principles and regulations, guaranteeing their **minimization, limitation of conservation, use for specific and transparent purposes and control at any time**.
- we pursue a high level of data quality in terms of **accuracy, exactness and updating**, adopting all measures to allow its cancellation or timely rectification.
- we guarantee a high level of **transparency** and clarity regarding the methods, types and purposes of the collection and processing of personal data on the channels, products and services provided to customers.
- we guarantee that the necessary **technical and organizational measures** are implemented to protect the personal data processed also by third parties acting in our name and on our behalf. In fact, a Responsible Data Sharing must be based on processes that actively consider, prioritize and protect the interests of individuals. To this end, we conduct **periodic audits** on third parties who process personal data in order to verify compliance with privacy and security requirements, and we organize **specific data protection training** aimed at third parties, so as to ensure that they are adequately trained on the company processes and the procedures to be followed, as well as on the applicable requirements.

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

6.2. Information Security

Flutter SEA 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 Flutter SEA:

- **We provide central security governance** to preserve confidentiality, integrity and availability of corporate information assets.
- **We promote innovation in security** 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 using a framework integrated into the overall corporate risk management model.

In addition, some Flutter SEA member Company have 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 Flutter SEA 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 Flutter SEA.

7. Training and Communication

At Flutter SEA 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 to support the creation of a culture of legality and oriented towards responsible and sustainable business.

8. Violations of this Code

Flutter SEA will deem third parties responsible for compliance with this Code. The third parties must disclose these expectations to their employees and suppliers. In case of non-compliance with the provisions of this Code, the third parties are required to implement the actions necessary to adapt their activities and operations.

Flutter SEA encourages everyone to report any violation or suspected violation of this Code through one of the dedicated channels made available by Flutter SEA and described in the Whistleblowing Policy, available on the institutional websites www.sisal.com and www.snaitech.it. Flutter SEA also reserves the right to initiate a process of verifying the third party's compliance with this Code by requesting documentation or carrying out on-site audits directly and/or through its representatives, and to investigate any possibility of violation of this Code committed by a third party.

Violations will be analysed on a case-by-case basis and dealt with in accordance with all applicable internal procedures, agreements and legal requirements. Corrective action plans to remediate non-compliance will be agreed and monitored, and re-audits to check on improvements will be carried out. Violations may also affect the qualification of the third party and result in warnings or, in the most serious cases, interruption or termination of the commercial relationship at any time against the non-compliant recipient, as well as requesting compensation for damages, if any the conditions.