# Business Continuity Policy

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| **Purpose** | The document is intended to communicate to the entire Group the commitment and support of top management toward the implementation and continuous improvement of the Business Continuity program. |
| **Scope** | ▪ Sisal SpA and its subsidiaries |
| **Attachments** | ▪ Flutter Global Business Continuity Policy |
| **Affiliation** | ▪ ISO 22301      ▪ ISO 22316<br>▪ ISO 22313      ▪ ISO 22361 |
| **Valid from** | 02/09/24 |

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| **A** | **Approved by** | Chief Risk & Compliance Officer | M. Belmonte | |
| **I** | **Distribution List** | DL_User Sisal Group | | |
| … | *Refers to RACI Standard* | | | |

## Document history

| Rev. | Content | Date |
|------|---------|------|
| 7.0 | Adoption of the Business Continuity and Crisis Management policies issued by the Flutter Group | 02/09/24 |
| 6.0 | General revision of the document due to corporate reorganization effective from 01/04/2023 | 07/07/23 |
| 5.0 | General revision of the document. Changes made to Annex B with the addition of ISO 22361 | 10/03/23 |
| 4.0 | Document updated considering the Group's internationalization process | 14/06/22 |
| 3.0 | Crisis Committee members update following company reorganization | 31/12/2021 |
| 2.0 | General document review: Description of Business Continuity Management process; definition of Business Continuity Roles and Responsibilities. | 27/10/20 |
| 1.0 | First issue | 12/10/18 |

# Summary

# 1   Introduction

Business Continuity defined as "the capability of an organization 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 the 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 its business.

# 2   Purpose and scope

Sisal Group[1] is committed to supporting the Business Continuity and Crisis Management System with adequate allocation of financial, human, infrastructure, and technological resources, consistent with the business continuity continuous improvement cycle (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 relevant international (ISO) standards on business continuity and crisis management.

This document applies to Sisal S.p.A. and to all Italian and foreign subsidiaries, excluding: Rete Servizi Integrati S.r.l.

The aforementioned company is excluded from the scope both because it is not wholly owned by Sisal S.p.A. and because the activities it carries out do not represent the Group's core business.
*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   Reference documents

This document refers to the principles contained in the:

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

Sisal's Business Continuity Management System complies with the standards/guidelines/regulations listed in the "Mappatura Normativa" document updated by the ISO Certifications function with the support of the Business Continuity team for its area of responsibility.

This document refers to and adopts the "Business Continuity" and "Crisis Management" policies issued by the Flutter Group. The requirements formalized in the above policies are addressed within the document "Business Continuity and Crisis Management Framework," to which reference is made.

# 4   Definitions, abbreviations, and acronyms

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

# 5   The goals of the program

The main purposes of the Sisal Group's Business Continuity Management System (BCMS) are:

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[1] Sisal S.p.A. and all Italian and foreign subsidiaries

1. Safeguard the health and safety of people (including employees, suppliers, customers, etc.);

2. Protect corporate assets (premised, points of sale, intellectual property, data, etc.);

3. Ensure business continuity of products/services at acceptable predefined levels following an outage;

4. Minimize the impacts of potential disruptions (of any nature) on the Group's activities;

5. Train the entire corporate population and spread the culture of business continuity within the Group;

6. Confirm and strengthen Sisal's reputation, both nationally and internationally.

To ensure that the BCMS is effective and efficient, Sisal has defined targets that it periodically measures and monitors through specific KPIs:

- Management, update, and review documentation;

- Training activities;

- Management, update, and review of Business Impact Analysis;

- Third-party management and monitoring;

- Management, update, and review of Business Continuity and Crisis Management plans;

- Exercises.

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

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

# 6   Roals and responsibilities

The roles and responsibilities of the BCMS are described within the document "*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, which is in charge of the full-time management and implementation of the BCMS of the entire Group.

The responsibilities of the Business Continuity Manager reside with the Business Information Security Manager.
Business functions, local and foreign, are responsible for proactively contributing to the program by supporting the Business Continuity Team in activities related to their area of responsibility.

# 7   Review and maintenance

The review of the entire program 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.

# 8 Dictionary

| Terminology | Definition |
|---|---|
| *Business Continuity* | Capability of an organization to continue the delivery of products and services within acceptable time frames at predefined capacity during a disruption. |
| *Business Continuity Management System (BCMS)* | Part of the overall management system that establishes, implements, operates, monitors, reviews, maintains, and improves business continuity. |
| *Crisis Management* | Coordinated activities to guide, direct, and control an organization in relation to the crisis. |
| *Business Continuity Program* | Ongoing management and governance process supported by thetop management and appropriately resourced to implement and maintain business continuity management. |
| *Organizational resilience* | The ability of an organization to absorb and adapt to a changing environment. |
| *Stakeholders* | Subject or organization that may influence, be impacted by or have the perception of being impacted by a decision or activity. |