2025 BRIGHTSTAR LOTTERY SUSTAINABILITY REPORT

Ahead of the Game

SustainablePlay™
Empowering Collaborating Preserving

BRIGHTSTAR™



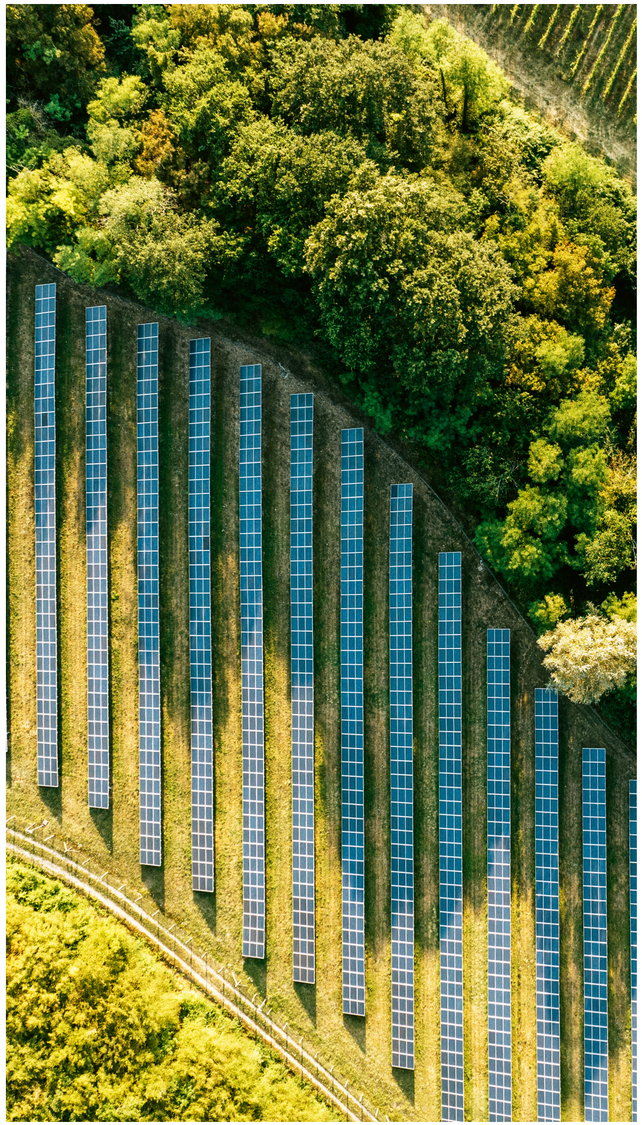


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Letter from the Executive Chair and Chief Executive Officer

GRI 2-22

Dear readers,

Last year marked the beginning of a new chapter in our Company's history. Following the sale of the Gaming and Digital business in July 2025, we officially returned to our roots as a pure play lottery business under the name Brightstar Lottery. While our name has evolved, our purpose remains the same: to lead the lottery industry responsibly while creating sustainable value for all our stakeholders.

Our commitment to sustainability continues to be recognized on a global scale. In 2025, Brightstar earned certifications from the World Lottery Association and European Lotteries for our responsible gaming programs in Italy, achieved the highest ESG rating of AAA from MSCI, and was included in the S&P 2026 Sustainability Yearbook. These recognitions, together with our alignment with the United Nations (UN) Sustainable Development Goals and participation in the UN Global Compact, reinforce the strong foundation upon which we continue to build.

Brightstar's sustainability strategy is built on three guiding elements: Empowering Our People, Collaborating with Partners, and Preserving the Planet. These elements shape the Company's operations, innovations, and growth, helping integrate sustainability considerations across our operations, innovation activities, and growth plans.



Marco Sala

Executive Chair
Brightstar Lottery



Vince Sadusky

Chief Executive Officer
Brightstar Lottery

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Over the course of 2025, meaningful progress was made across the key areas that bring our sustainability strategy to life.

We continued to foster a workplace that prioritizes well-being, inclusion, and career growth, earning the Top Employer certification for the third consecutive year in the U.S. and Italy. Throughout the year, several training programs focusing on leadership, digital growth, artificial intelligence, and sustainability were offered to our global employees. Our Human Rights Policy has been strengthened, reinforcing our commitment to fair and ethical practices across our operations and value chain, including the prevention of child and forced labor and the promotion of equal opportunity and respect for all.

Brightstar's leadership in responsible gaming was also advanced through the introduction of a Responsible Marketing Policy, which strengthened our approach to player protection, Positive Play, and awareness surrounding responsible gaming tools. A key initiative in 2025 was the Emerging Adults Summit, developed in collaboration with the Indiana Council on Problem Gambling, that brought together experts, advocates, and industry stakeholders from across the U.S. and Canada to share insights and strategies focused on gambling behaviors among emerging adults. The summit, along with other responsible gaming initiatives, event participation, and internal awareness campaigns, demonstrated our dedication to contributing to research, education, and prevention efforts across the industry.

Our commitment to supporting the communities where we live and work remained a guiding priority. Through our enhanced Global Charitable Giving and Community Engagement Policy, along with programs such as After School Advantage, employee-driven programs, volunteer initiatives, and our community ambassador network, Brightstar creates meaningful opportunities to support local communities and address evolving social needs. In 2025, Brightstar hosted 48 global volunteer events in 10 locations around the world, in which more than 1,000 employees participated. Matching gifts donations were made to 95 charitable organizations, and the Company supported 15 new charitable events through its Community Request Program.

Across our operations, sustainability was integrated into decision-making. Our Sustainable Procurement Policy was further developed to embed environmental and social considerations throughout our supply chain, reinforcing our commitment to responsible sourcing and supplier accountability. This includes engaging suppliers that maintain relevant environmental and labor-related policies, practices, or certifications and reinforcing our geographic and supplier-level monitoring capabilities.

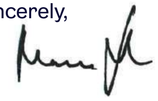
In 2025, our Environmental Policy was updated, which outlines the approach to managing environmental impacts and driving continuous improvement of our environmental efforts aligned with Brightstar's commitment to the Science Based Targets initiative. Through targeted analyses, including Life Cycle Assessments and Product Carbon Footprint studies, we deepened our understanding of our environmental impact and identified clear opportunities to reduce it. These efforts are guiding improvements in resource efficiency, the adoption of eco-design principles, and the transition toward more digital and dematerialized solutions. Brightstar's digital ticket was enhanced in 2025 to incorporate digital-first prize processing. We committed to mitigating paper sourcing by increasing the use of certified and lower-impact materials and to advancing recycling, reuse, and recovery practices through responsible resource use and sustainable product design.

Building upon our achievements year after year, we introduced an evolved Sustainability Plan in early 2026, which reflects a deeper understanding of our operating environment, including regulatory developments, market expectations, and stakeholder priorities. It establishes a clear set of commitments, actions, and goals aligned with our strategic direction, while remaining flexible enough to adapt as new insights emerge.

As we look ahead, this enhanced plan will guide how Brightstar continues to strengthen resilience, drive innovation, create long-term value, and ensure that sustainability remains at the core of our business.

We invite you to explore this report and learn more about how Brightstar is advancing the industry while building a more sustainable future.

Sincerely,



Marco Sala
Executive Chair
Brightstar Lottery



Vince Sadusky
Chief Executive Officer
Brightstar Lottery

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Brightstar Lottery's Sustainability Journey

Brightstar Lottery's sustainability journey began through its predecessor companies. Leveraging its experience and prior accomplishments, today, Brightstar is focused on reaching new milestones of its Sustainable Play™ commitment to leading the lottery industry in global sustainability.

2015

- Receives First World Lottery Association Supplier Certification

2017

- Commits to the United Nations Sustainable Development Goals

2018

- Adheres to the 10 principles of the United Nations Global Compact
- Creates Employee Impact Groups

2021

- Creates the Global Sustainability Committee
- Adheres to the Science Based Targets initiative to set targets to reduce greenhouse gas emissions according to scientific evidence
- Publishes the Responsible Gaming Policy

2022

- Publishes the Sustainability Plan (2022/2025)

2023

- Launches Sustainable Play™, representing the Company's commitment to leading the lottery industry in sustainability
- Publishes the Global Sustainability Policy
- Receives AAA score by MSCI ESG rating
- Celebrates the 350th global After School Advantage digital learning center
- Receives recognition as Top Employer in Italy and the U.S.

2024

- Becomes first vendor to receive the new Internet Compliance and Assessment Program Ready certification by the NCPG
- Recognizes the 25th anniversary of the After School Advantage Program

2025

- Develops enhanced Global Responsible Gaming Model
- Introduces eco-design principles for new retail solution products

2026

- Celebrates the 400th global After School Advantage digital learning center
- Delivers its 2026–2028 Sustainability Plan, reaffirming its commitment to long-term value for people, partners, and the planet

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Methodological Note

This Sustainability Report was published on July 15, 2026 by Brightstar Lottery PLC (hereinafter, the 'Parent,' and together with its consolidated subsidiaries, 'Brightstar' or the 'Company'), to disclose its sustainability performance to its stakeholders.

Report Profile

GRI 2-2; GRI 2-3; GRI 2-4; GRI 2-5

Boundary and Reporting Period

On July 1, 2025, the Company completed the sale of its Gaming and Digital business (IGT Gaming) to a holding company owned by funds managed by affiliates of Apollo Global Management, Inc.

Following the closing of the transaction, Brightstar became a premier pure play global lottery company. Brightstar's Sustainability Report is solely related to its lottery operations (continuing operations) and is aligned in terms of reporting scope with the Company's financial statements, including the UK Annual Report and Accounts and Form 20-F for the year ended December 31, 2025. For a better understanding of the Company and its business, please refer to these documents.

Consistent with the Company's financial statements, this Sustainability Report covers fiscal year 2025 (January 1, 2025 – December 31, 2025) and is focused on sustainability activities, initiatives, and significant events that took place during that year. Where relevant developments occurred after December 31, 2025, but prior to the publication date of this report, they have been clearly disclosed, where applicable.

The report includes quantitative data for both 2025 and 2024, referring to a reporting perimeter exclusively focused on the lottery business.

Data for 2023 relate to the former Group structure, which included both Lottery and Gaming and Digital businesses, and have therefore not been included. The significant change in scope following the spin-off of the gaming business means that data for 2024 and 2025 are not directly comparable with those of 2023. Consequently, this Report presents quantitative information only for the 2024 and 2025 reporting years.

An initial submission and validation of targets was presented to the Science Based Targets initiative (SBTi) in 2023, using 2019 as the baseline year. New targets reflecting Brightstar's revised operational scope were internally reviewed and endorsed by the Sustainability Steering Committee (SSC) during a meeting held in June 2026. The objectives were subsequently presented to the Nominating and Corporate Governance Committee (NCGC). Finally, the targets will be submitted to the SBTi for validation. They are expected to be formally approved in the second half of 2026.

Brightstar uses a third-party data collection tool for its environmental data collection process. Data is uploaded to the system on an ongoing basis and aggregated annually at the end of the reporting year. This schedule supports the preparation of the relevant sections of the UK Annual Report and Accounts (prepared in accordance with the UK Companies Act 2006) and the Sustainability Report.

Estimates and assumptions

Energy data and Greenhouse Gas (GHG) emissions from Brightstar sites that were unable to provide their electricity and natural gas consumption for 2025 have been estimated to allow for the computing of GHG emissions across 100% of Brightstar's active locations. A similar estimate was made to include sites that were unable to provide water withdrawal and discharge and waste generation data for 2025. Brightstar adopted reasonable and consistent assumptions aligned with internal policies and reporting practices.

The methodology and assumptions concerning Scope 3 emissions are reported in the chapter, "Climate Action, Biodiversity, and Circularity."



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GRI Preparation Principles

Based on the current coverage of both “Universal Standards” and “Topic Standards” linked to material topics, this report has adopted the “In accordance with” option of the “GRI Sustainability Reporting Standards 2021.” The content index is shown on page 191.

Sources and Data Gathering Systems

Data sources include internal documents, market surveys, and other official sources indicated in this report. Financial and economic data and information are derived from Brightstar’s U.S. Form 20-F and UK Annual Report and Accounts for the year ended December 31, 2025.

Assurance Process

This report has been verified by Forvis Mazars S.p.A., an independent auditor who has carried out a limited assurance engagement according to the International Standard on Assurance Engagements (ISAE) 3000 (revised) criteria. Any information reported in this sustainability report that does not refer to any general or topic-specific disclosure of the GRI Standards is not subject to the limited assurance by the independent auditor.

Report Structure

This report is organized into introductory sections followed by three main chapters and one appendix:

- The introductory sections include: the Letter from the Executive Chair and the Chief Executive Officer, which sets out the Company’s strategic vision and key messages; Brightstar’s Sustainability Journey, which outlines the evolution of the Company’s sustainability commitments and related milestones; the Methodological Note and Sustainability Materiality Analysis.
- “About Brightstar Lottery” provides an overview of Brightstar’s business and main activities and describes the regulatory framework in which the Company operates. It also highlights Brightstar’s ongoing dialogue with customers and provides information on its commitment to innovation, on its tax strategy and performance assessed by environmental, social, and governance (ESG) rating agencies.
- “Governance and Business Integrity” describes Brightstar’s Governance and the role of sustainability governance in the Company’s overall strategy. It also demonstrates that the Company is committed to ensuring compliance with laws of the jurisdictions in which it operates, as well as adherence to codes and policies that promote ethical behavior. The section provides information on enterprise risk management, ESG risks, data protection, cybersecurity, business recovery plans, anti-fraud and anti-money laundering, and product responsibility.
- “Sustainable Growth” showcases Brightstar’s sustainability priorities, commitments to the United Nations Global Compact (UNGC) and Sustainable Development Goals, and approach to stakeholder engagement. It describes Brightstar’s Sustainability Strategy and approach to the following spheres of impact: employee engagement; human rights; responsible gaming; community engagement; sustainable procurement, and climate action, biodiversity and circularity.
- In the Appendix of this report, both Universal and Topic standards are reported within the content index in accordance with the GRI Sustainability Reporting Standards. It also includes the social Key Performance Indicator (KPI) tables, the independent auditors’ report, the United Nations Global Compact (UNGC) table, and the California Corporate Greenhouse Gas Reporting Program.

This report is published in English on the global sustainability section of brightstarlottery.com, and in English and in Italian on brightstarlottery.it.

More information and in-depth analysis about topics disclosed in this report can be requested via email at sustainability@brightstarlottery.com.

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Identifying Sustainable Material Aspects

GRI 3-1; GRI 3-2; GRI 3-3; GRI 2-12

In 2025, the Company conducted its materiality assessment in accordance with the GRI 3: Material Topics (2021) Standard, as part of the GRI Sustainability Reporting Standards.

Sustainability Materiality Analysis

The topics covered in this report have been identified by a materiality definition process that Brightstar established to identify the most relevant economic, environmental, and social topics requested by the GRI Sustainability Reporting Standards. These standards require the report to include information related to topics deemed to have the most significant impacts on the economy, environment, and people, including on human rights.

The materiality analysis was carried out through five phases (1) understanding the sustainability context in which Brightstar operates; (2) identifying current and potential negative and positive impacts; (3) assessing the significance of impacts; (4) prioritizing the most significant impacts for reporting purposes; and (5) shifting from impacts to sustainability material topics to be validated by the Company's senior leaders. The analysis accounted for the entire value chain of Brightstar and included not only the Company's operations but also upstream and downstream activities.

Phase One

During the first phase, Brightstar identified and analyzed the most common impacts on the economy, environment, and people in its operations, business relationships, and sustainability activities. The analysis covered:

- Industry trends: a thorough review of published reports by key international sustainability influencers in the lottery industry, to identify the main sustainability trends.
- Brightstar's documentation and procedures to explore the main impacts of the Company.
- Benchmark analysis: a review of competitors' sustainability reports and similar publicly available information in the lottery industry to identify the most widely discussed sustainability issues.

Phase Two

In the second phase, Brightstar identified its actual and potential impacts on the economy, environment, and people. Actual impacts are defined as those that have already occurred, while potential impacts are those that only have a possibility of occurring. These impacts are categorized as negative and positive, short-term and long-term, intended and unintended, reversible and irreversible, and if they have an impact on human rights across the organization's activities and business relationships.

2025 Brightstar List of Material Topics

Environmental	Social	Economy
Air pollution	Customer privacy and security	Business ethics
Biodiversity	Employee skills development and employee well-being	
Climate change	Human and labor rights	
Raw materials consumption	Local communities support	
Relationship with suppliers	Relationship with suppliers	
Waste and product end-of-life	Supporting good causes through lottery revenues	
Water resources	Responsible, legal and secure gaming	
	Workplace health and safety	

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Phase Three

In phase three, Brightstar used critical and professional judgement to assess the significance of its identified impacts, both quantitative and qualitative. The analysis enabled Brightstar to consider all specificities of the sector in which the Company operates, as well as its business relationships. To assess actual negative or positive impacts, Brightstar considered the severity of the impacts determined by scale (how serious or beneficial the impact is), scope (how widespread the impact is), and the irremediable character of the impact (how hard it is to counteract or mitigate the harm resulting from negative impacts). For potential negative or positive impacts, the significance was determined by severity and likelihood.

The assessment was carried out by the Global Sustainability team, leveraging internal knowledge and inputs from the relevant business functions. In line with its sustainability strategy, and recognizing the added strategic value that external perspectives can provide, the Company intends to involve stakeholders in the materiality analysis process in future years.

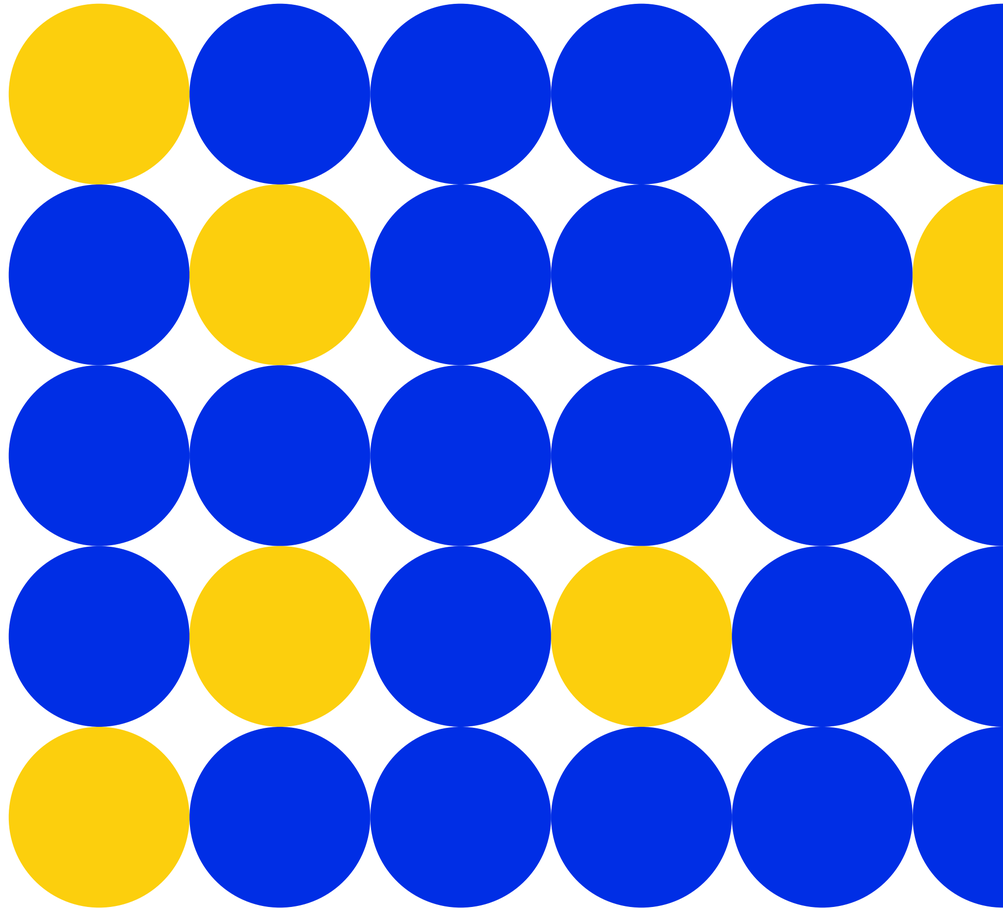
Phase Four

In the fourth phase, Brightstar built on the outcomes of the impact assessment performed in phase three to define and prioritize its most significant impacts, applying the Group materiality threshold established and formally endorsed by the parent Company.

This structured prioritization process allowed Brightstar to determine which impacts are to be considered relevant and to identify the related material topics to be disclosed, in line with the requirements of GRI 3. Each material topic groups together all impacts that are associated with the same underlying sustainability matter (e.g., biodiversity, climate change), thereby providing a coherent and comprehensive representation of the Company's most significant effects on the economy, environment, and people. To further ensure the robustness and accuracy of the results, the identified impacts and corresponding material topics were subsequently validated through an internal review involving Brightstar's subject matter experts, who possess in-depth knowledge and operational insight into one or more of the material topics identified.

Phase Five

In phase five, the material topics were classified according to the following categories: environment, social, and economy. The list (which remains unchanged from, and consistent with, the list disclosed in the 2024 Sustainability Report) was reviewed and approved by the SSC and later acknowledged by the NCGC of the Parent's Board of Directors.



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Financial Materiality

In line with evolving sustainability reporting practices, a financial materiality assessment was conducted on a voluntary basis using evolved legislative requirements and following the European Sustainability Reporting Standards (ESRS). The assessment evaluated how sustainability related risks and opportunities may affect Brightstar's financial performance or position.

The evaluation accounted for both the likelihood and magnitude of emerging risks and their potential financial relevance. Special attention was given to forward-looking issues such as environmental compliance, climate transition, and human rights, which may influence the Company's financial standing in the long term.

Many of these risks and opportunities may stem from past events or anticipated future developments, which can affect the availability of key resources or shape relationships with stakeholders, ultimately affecting Brightstar's operational capacity and reputational standing.

Brightstar not only assessed the direct financial implications of its operations, but also how external sustainability trends and stakeholder expectations could shape its financial exposure.

The following are among the key sustainability related risks identified in 2025:

- Decreasing revenues and increasing insurance and renovating costs on physical assets linked to extreme weather events
- Increasing legal costs linked to a failure to comply with new climate change related regulations
- Increasing procurement costs associated with the requirement for suppliers to adjust to the legal environmental landscape and customers' requests (climate change)
- Increasing legal costs linked to a failure to comply with biodiversity protection regulations e.g. (EU Deforestation Regulation)[1]
- Increasing procurement costs associated with the requirement for suppliers to adjust to the legal environmental landscape (biodiversity)
- Increasing operating costs linked to the unavailability of non-renewable raw material supply
- Increasing legal costs linked to a failure to respect employees' human and labor rights
- Increasing legal and operating costs linked to a failure to comply with health and safety regulations
- Increasing operating costs of talent acquisition and training in cases of high turnover rates among employees
- Increasing legal costs linked to a failure to comply with player privacy regulations
- Decreasing revenues linked to customers' increasing awareness of sustainability issues
- Increasing legal and operating costs linked to a failure to comply with anti-corruption, fair competition and ethical business regulations

The following are among the key sustainability opportunities identified in 2025:

- Increasing revenues and decreasing talent acquisition costs due to the competitive advantage obtained through employee well-being and upskilling initiatives
- Decreasing operating costs linked to financial incentives and successful public concession participation in climate strategy regulations
- Increasing revenues linked to the implementation of low-carbon technologies and the attraction of environmentally conscious customers
- Decreasing operating costs linked to improved energy efficiency and transition to renewable energy sources
- Increasing revenues linked to the implementation of eco-design strategies and the attraction of environmentally conscious customers

Currently, stakeholders expect organizations to demonstrate accountability, transparency, and proactive management of sustainability issues. They want insight into how companies manage their environmental footprint, uphold ethical business practices, and safeguard the well-being of employees, customers, and communities. At Brightstar, meeting these expectations means embracing responsible practices, from emissions monitoring, material consumption reduction, and responsible gaming initiatives to community engagement, regulatory compliance, and sustainable operations.

Continuous sustainability monitoring and risk management are critical to protecting Brightstar's value generation and business continuity - especially amid growing global uncertainty and regulatory change.

In line with the UK Companies Act 2006, Brightstar included a dedicated section on climate-related financial disclosures, covering governance, strategy, risk management, and metrics and targets in its 2025 UK Annual Report and Accounts. For more details, stakeholders can refer to the full report, which is available on Brightstar's website.

1 This risk was initially included in the double materiality assessment since, at the time the assessment was conducted, the EU Deforestation Regulation ("EUDR") was in force and Brightstar was expected to comply with it from December 31, 2025 in light of the inclusion of paper and paper products within the scope of the Regulation and their fundamental role in Brightstar Lottery's operations. In particular, certain products classified as "other articles of wood", made from the relevant commodity wood, were considered in scope under the Regulation, with printed products falling under Article 49. On this basis, the Company started to implement the necessary processes to ensure compliance. Subsequently, the EUDR was amended and the products listed under Article 49 were excluded from the scope of the Regulation. As a result, Brightstar is no longer subject to the requirements of the EUDR, and this risk has become less relevant in terms of likelihood and, therefore, overall materiality.

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About Brightstar Lottery



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About Brightstar Lottery

Company Profile

GRI 2-1; GRI 2-6

Brightstar Lottery PLC (the Parent, and together with its consolidated subsidiaries, Brightstar or the Company) is a global leader in lottery industry focused on innovation and forward-thinking strategies and solutions, building on its renowned expertise in delivering secure technology and producing reliable, comprehensive solutions for its customers. The Parent is a public limited company incorporated under the laws of England and Wales with its ordinary shares listed on the New York Stock Exchange (NYSE) under the ticker symbol BRSL. In July 2025, the Parent officially changed its corporate name from International Game Technology PLC to Brightstar Lottery PLC following the sale of its Gaming and Digital business (IGT Gaming) to a holding company owned by funds managed by affiliates of Apollo Global Management, Inc.

Brightstar's leading lottery operations, retail and digital solutions, and award-winning lottery games enable its customers to achieve their goals, entertain players, and distribute benefits to communities. Brightstar is a trusted partner to governments and regulators around the world, creating value in line with standards of service, integrity, and responsibility.

The Company is headquartered in London, United Kingdom, with principal operating facilities located in Providence, Rhode Island and Rome, Italy. As of December 31, 2025, Brightstar had approximately 6,000 employees.



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Products and Services

Brightstar is the largest lottery operator in the world, based on total combined wagers — an achievement that has built global leadership and trust. In Italy, through its subsidiaries Lotterie Nazionali S.r.l. and Lottoitalia S.r.l., Brightstar Lottery S.p.A. operates instant lotteries and Gioco del Lotto, together with other fixed odds draw games. Two major U.S. markets, Indiana and New Jersey, partner with Brightstar to power their state lotteries. Six territories in the Caribbean also rely on Brightstar for lottery operations. Brightstar has built trusted partnerships with these lotteries to run all aspects of their day-to-day business with expertise and reliability.

Brightstar operates and provides an integrated portfolio of innovative lottery solutions, including lottery management services, instant tickets, and systems. Its worldwide land-based lottery and iLottery business includes sales, operations, product development, technology, and support.

Brightstar has the global scale to complement its geographic and customer diversification. As of December 31, 2025, it provides business-to-consumer (B2C) and business-to-business (B2B) products and services to customers across six continents, supplying a unique set of lottery solutions to nearly 90 customers worldwide, including to 37 of the 48 U.S. lotteries.

Lottery customers frequently designate their revenues for specific purposes such as education, economic development, conservation, transportation, programs for senior citizens and veterans, health care, sports facilities, capital construction projects, cultural activities, tax relief, and others. Many governments have become increasingly dependent on their lotteries, as revenues from lottery ticket sales are often a significant source of funding for these programs.

Land-Based Lottery

Land-based lottery products and services are provided through operating contracts, Facilities Management Contracts (FMCs), Lottery Management Agreements (LMAs), and product sales contracts. In most jurisdictions, lottery authorities award contracts through a competitive bidding process. Typical service contracts range from five to 10 years in duration, often with multiple multi-year extension options.

Brightstar designs, sells, leases, and operates a complete suite of point-of-sale machines. These machines are electronically linked with a centralized transaction processing system that reconciles lottery funds between the retailer and the lottery authority.

Brightstar develops new lottery games and installs a range of new lottery distribution devices, all of which are designed to drive responsible same-store sales growth for its customers. In connection with its delivery of lottery services, the Company actively advises many of its customers on growth strategies and, depending on the type of contract and the jurisdiction, provides marketing services, including retail optimization and lottery brand-awareness campaigns.

iLottery

Brightstar provides a comprehensive, end-to-end iLottery ecosystem designed to enable government-regulated lotteries to engage players through integrated digital channels.

Operating Contracts, Facilities Management Contracts, and Lottery Management Agreements

The majority of Brightstar's revenue comes from operating contracts and FMCs. Since 1998, the Company has been the exclusive licensee for the Gioco del Lotto (management of operations commenced in 1994). Since 2004, the Company, through its subsidiary Lotterie Nazionali S.r.l., also has been the exclusive concessionaire for the Italian instant ticket lottery, Gratta e Vinci.

Brightstar FMCs typically require the Company to design, install, and operate the lottery system and retail terminal network for a designated term. Brightstar also provides a wide range of services to lottery customers related to technology, equipment, and facilities such as hosting, maintenance, marketing, and other support services.

Another form of operating contract is an LMA. Under an LMA, Brightstar manages, within parameters determined by the lottery customer, the core lottery functions, including the lottery systems and most of the day-to-day activities along the lottery value chain. This includes managing accounting and other back-office functions, running advertising and promotions, operating data transmission networks and processing centers, training staff, providing retailers with assistance, and supplying materials for the games.

In the U.S., Brightstar operates the Indiana and New Jersey lotteries. In New Jersey, Brightstar provides lottery management services as part of a joint venture where the Company manages a wide range of the lottery's day-to-day operations and provides marketing and sales services under a license valid through June 2029. In Indiana, Brightstar provides lottery management services through a wholly-owned subsidiary of the Parent under a license valid through June 2032. Six territories in the Caribbean also rely on Brightstar for lottery operations.

Instant Ticket Services Contracts

As an end-to-end provider of instant tickets and related services, Brightstar produces high-quality instant ticket games and provides ancillary services such as instant ticket marketing plans and graphic design, programming, packaging, shipping, and delivery services.

Product Sales and Services Contracts

Brightstar assembles, sells, delivers, and installs turnkey lottery systems or lottery equipment, provides related services, and licenses related software. The lottery authority maintains, in most instances, responsibility for lottery operations.

Commercial Services Contracts

Brightstar develops innovative technology and offers commercial and payment services over a standalone network. Leveraging its distribution network and secure transaction processing experience, the Company offers high-volume processing of commercial and payment transactions including prepaid cellular telephone recharges, bill payments, e-vouchers, electronic tax payments, stamp duty services, and prepaid card recharges.

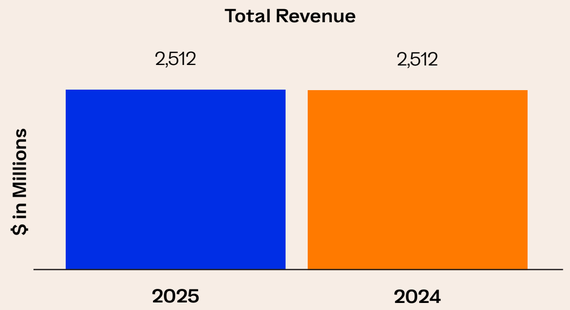
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Financial Performance

Brightstar's business model is characterized by robust recurring revenues and a diversified geographic and product mix to create value for all stakeholders. Innovation is the key growth driver in the areas of content, technology, distribution, and marketing.

The infographic below shows the figures related to revenues. For additional information, please see the documents Form 20-F and UK Annual Reports and Accounts 2025.

Financial Highlights



Direct Economic Value Generated and Distributed

GRI 201-1; GRI 3-3

Brightstar Lottery creates value for its stakeholders, including government authorities, investors, employees, suppliers and contractors, and local communities. According to the Global Reporting Initiative (GRI), an independent international organization that has pioneered sustainability reporting since 1997, "information on the creation and distribution of economic value provides a basic indication of how an organization has created wealth for stakeholders."

Brightstar is committed to investing in its business to maintain market competitiveness and economic sustainability, and to pursuing its financial goals with a high level of transparency and integrity. In accordance with GRI Standards, Brightstar compiles information for economic disclosures using figures from its audited financial statements and internally audited management accounts.

Direct economic value generated and distributed data for the financial year ended December 31, 2025, were sourced from the Annual Report on Form 20-F filed with the U.S. Securities and Exchange Commission (SEC) in February 2026, the UK ARA filed with the UK Companies House in May 2026 and other audited internal reports. In 2025, the economic value generated by Brightstar amounted to US$ 2.5 billion, with economic value distributed topping US$ 2.2 billion.

Economic Value Generated and Distributed ($ thousands)	2024	2025
Economic Value Generated	**2,512,000**	**2,511,000**
Economic Value Distributed	**2,243,000**	**2,226,000**
Value to employees	690,980	673,091
Value to governments	289,617	211,487
Value to communities	2,626	2,761
Value to suppliers	1,053,777	1,166,661
Value to providers of capital	206,000	172,000
Economic Value Retained	**269,000**	**285,000**

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Regulatory Framework and Legislative Changes

The lottery industry is among the most highly regulated businesses in the world. Governments and regulatory bodies play a key role in upholding primary legislative objectives, including ensuring legality and public security, protecting consumers and fair competition, maintaining public safety, and ensuring financial and tax compliance. Proper regulatory oversight helps ensure that the appropriate amount of tax revenue is collected by government authorities to fund important government-sponsored programs and good causes.

The global market for regulated gaming is characterized by two main dynamics: strong player demand and governments that use regulated lotteries to fund state budgets, including providing support for good causes such as education, community services, and the promotion of sports. To meet player demand, Brightstar operates within regulated frameworks and supports efforts to discourage illegal gaming, and to ensure its products are sold only in regulated markets. Brightstar leverages its global presence, product offerings and experience to provide lottery solutions aligned with regulatory and responsible gaming requirements.

For the purpose of reporting on the dialogue with regulatory authorities and on regulatory changes, this report will solely focus on the U.S. and Italy regions, as they represent the most significant markets to Brightstar.

Dialogue with Regulatory Authorities

A comprehensive network of internal and external resources and controls is required to achieve compliance with the broad governmental oversight of Brightstar's business. A robust internal program is designed to support compliance with applicable requirements imposed in connection with lottery activities, as well as legal requirements generally applicable to all publicly traded companies.

Brightstar complies with standards set forth by specialized lottery authorities and related government agencies. In some instances, regulators not only govern the activities within their jurisdictions but also monitor Brightstar's activities in other jurisdictions to ensure compliance with local operating standards on a global basis. Brightstar engages government relations consultants globally to assist with a variety of activities related to its lottery business. All government relations consultants are required to follow applicable rules, regulations, reporting, and registration requirements in the jurisdictions in which they act on behalf of Brightstar.

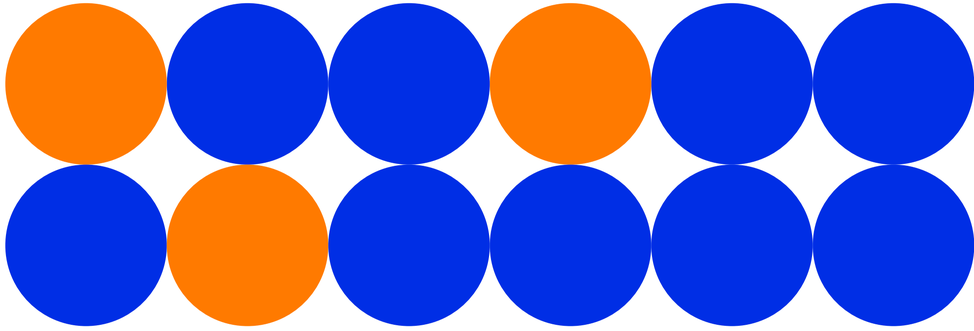
Brightstar engages with regulators through structured, processes overseen by the Legal and Compliance functions on regulatory matters. These engagements include participation in regulatory consultations, formal meetings, responses to regulatory inquiries, licensing and compliance reviews, and ongoing dialogue related to changes in laws, regulations, and regulatory expectations. Brightstar schedules meetings with regulatory bodies to discuss ongoing compliance, changes in legislation, and best practices. Brightstar may proactively seek regulators' feedback on planned changes to ensure alignment with governing laws and standards.

Brightstar in Italy works consistently with the Italian Customs and Monopolies Agency (Agenzia delle Dogane e dei Monopoli, hereinafter "ADM") to ensure the operation, development, and compliance of licensed products with regulations. It also provides, where requested, technical and experiential support to the institutional stakeholders responsible for the governance of legal public gaming. The ADM publishes a weekly public agenda of meetings with stakeholders, with the aim of making dialogue between stakeholders and public decision-makers as transparent as possible.

Regulatory Framework and Updates

Lottery laws are designed to ensure that gaming is conducted honestly, competitively, and free from criminal and corruptive elements. Since Brightstar conducts business with governments and government-regulated gaming entities, public affairs and government relations are essential to Brightstar's interests.

Brightstar's lottery products and technologies require certification or approval in the jurisdictions where it conducts business. While regulatory requirements vary depending on jurisdiction, the majority typically require some form of jurisdictional licensing or regulatory suitability of operators, suppliers, manufacturers, and distributors, as well as its major shareholders, officers, directors, and key employees. Regulators review applicants, based on financial stability, integrity, and business experience.



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U.S. Lottery Regulations

Lotteries in the U.S. are regulated by state or other applicable laws. There are currently 48 U.S. jurisdictions (including the District of Columbia, Puerto Rico, and the U.S. Virgin Islands) that authorize the operation of lotteries. Additionally, a few state lotteries offer internet instant ticket game sales to in-state lottery customers, and several states allow subscription sales of draw games over the internet. The operations of lotteries and lottery operators are subject to extensive and broad regulations which vary state-by-state.

To ensure the integrity of contract awards and lottery operations, most jurisdictions require detailed background disclosures on a continuous basis from vendors and their officers, directors, subsidiaries, affiliates, and principal stockholders. Background investigations of the vendors' employees directly responsible for the operation of lottery systems are also conducted. Certain jurisdictions also require extensive personal and financial disclosure and background checks from persons and entities beneficially owning a specified percentage of a vendor's securities.

In 2025, prediction markets emerged as a major regulatory flashpoint, testing the boundaries between U.S. federal commodities law and state gaming regulations. These platforms – which allow users to trade contracts tied to future events including outcomes in politics, economics, and sports – operate in a legal grey area but fall under the oversight of the Commodity Futures Trading Commission. The prediction exchange market, known as Kalshi has been at the center of this debate, actively challenging state cease-and-desist orders that allege unlicensed sports betting. While Kalshi has largely found success in federal courts by asserting federal preemption over state gaming laws, it continues to face active disputes in roughly 11 states, leaving the long-term regulatory framework unresolved.

At the same time, a few states intensified their scrutiny of lottery-related activities, specifically lottery couriers. Lottery couriers are third-party services, often in the form of an app or website that purchases official, physical lottery tickets on behalf of customers. In 2025, some states moved to regulate or restrict lottery courier services, with the state of Texas criminalizing the activity and shifting lottery oversight to a new state agency. Courier services continue to be a topic of ongoing concern in the U.S.

Around 15 jurisdictions are already offering iLottery or digital products. Alabama and Hawaii are revisiting the possibility of establishing state-run lotteries, though both efforts face significant legislative and political hurdles.

Italian Lottery Regulations

In Italy, Brightstar is subject to regulatory oversight by the ADM, acting under the authority and supervision of the Ministry of Economy and Finance. As of December 31, 2025, Brightstar held, through its subsidiaries, valid public-gaming concessions in Italy for the operation of Gioco del Lotto games and other fixed-odds numerical games, instant ticket lotteries (Gratta e Vinci), and remote public gaming (online). Pursuant to Italian law and regulations, public gaming in Italy, which includes betting, is reserved to the State and may be carried out exclusively under a concession or authorization granted by the relevant authorities. Any gaming activity carried out in the absence of, or in breach of, a valid concession or authorization is deemed illegal and may give rise to administrative and criminal sanctions, as applicable.

The Italian public gaming sector is complex and highly regulated and is characterized by the coexistence of multiple public and private interests. Within this framework, the regulatory system pursues primary public interests, including the protection of public health, consumer and player protection, the safeguarding of minors and vulnerable persons, and the prevention and suppression of illegal gaming and related criminal activities. The current Italian regulatory framework identifies the concessionaire as the central and essential operator in the public-gaming system. The concessionaire is entrusted, pursuant to the relevant concession, with the collection and management of wagers on behalf of the State, ensuring the protection of public interests and the proper allocation of gaming revenues.

Under Italian law, the Ministry of Economy and Finance, through ADM, is vested with the authority to introduce public games and to manage gaming activities either directly or by granting concessions to qualified operators selected through public tender procedures. The establishment, award, and management of gaming concessions are governed by a comprehensive framework of primary and secondary legislation, regulatory acts, and concession agreements.

Gaming concessions are granted pursuant to public tender procedures governed by Italian and EU public-procurement principles. The concession agreement sets out the rights and obligations of the concessionaire, in accordance with applicable laws and regulations. Concessions are granted for a fixed term, generally nine years, and are not automatically renewed unless expressly provided for in the relevant concession agreement. Any renewal or extension is subject to the applicable legal framework and regulatory discretion and is not guaranteed on identical terms.

Italy has traditionally experienced periodic amendments to its public-gaming regulatory framework, and the lottery sector is no exception. Brightstar maintains an ongoing and structured dialogue with the ADM to ensure the operation, development, and regulatory compliance of its licensed products. Brightstar also provides, upon request, technical and operational support to institutional stakeholders responsible for the governance of legal public gaming.

The Law n.207 of December 30, 2024 (State Budget for the financial year 2025 and the 2025-2027 multi-year budget period – known as the Budget Law) introduced various measures aimed at optimizing the regulation of public gaming, including remote public gaming and Bingo. Starting in 2025, the Budget Law permanently introduced an additional weekly Friday draw for the Gioco del Lotto and Superenalotto games, and provided for temporary extensions, subject to the payment of statutory fees, of certain concessions relating to gaming machines, bingo, and land-based betting networks, with terms extended until December 31, 2026.

In 2025, as part of implementation of Legislative Decree No. 41 of 25 March 2024 (titled "Provisions for the reorganization of the gaming sector, with specific reference to remote gaming, pursuant to Article 15 of Law No. 111 of August 9, 2023") Italy adopted two key framework regulations aimed to modernize and harmonize the public-gaming sector, within Italy's broader process of restructuring the national gaming system and reorganizing a previously fragmented regulatory landscape:

- Decree of the Ministry of Economy and Finance November 14, 2025, no. 197 - concerning the framework regulation of national instant lotteries.
- Decree of the Ministry of Economy and Finance December 3, 2025, no. 214 - concerning the framework regulation of fixed-odds numerical games.

These regulatory measures are intended to: (i) replace

outdated regulatory structures, ensuring alignment with modern distribution channels and digital participation; (ii) reinforce the concession based model, clarifying operator responsibilities and the State's supervisory role; (iii) strengthen the governance and oversight of gaming activities through more structured and uniform rules applicable across the sector; (iv) enhance consumer protection and market transparency through clearer rules on prize structures, claims, responsible gaming measures, and Anti-Money Laundering (AML) safeguards; and (v) increase legal and regulatory certainty for concessionaires, clarifying obligations and operational standards and compliance requirements.

Instant Lotteries Framework Regulation key features include:

- Comprehensive rules for both physical and online instant-draw tickets.
- Defined prize structures, draw mechanics, payout rules, and validation procedures.
- Mandatory responsible gaming warnings and measures to prevent compulsive play.
- Detailed AML obligations and restrictions on cash operations.
- Limitations on advertising and enhanced transparency requirements.

Fixed-Odds Numerical Games Framework Regulation key features include:

- Operational standards for the automated Lotto system and other numerical games.
- Enhanced controls on number draw procedures, integrity of systems, and monitoring of concessionaires.
- Updated concession rules and compliance requirements, including reporting and supervision mechanisms.

Pursuant to art. 6 of Legislative Decree no. 41 of March 25, 2024, a tender process for the awarding of remote gaming concessions was carried out during 2025, with new remote gaming concessions assigned to 46 operators with effect from November 13, 2025 for a duration of nine years.

The Budget Law for 2026 introduced additional measures affecting the Italian public-gaming sector:

- Establishes a new national game "Win for Italia Team," where the State's revenue share is allocated to the financing of CONI, the Italian Olympic Committee. This measure expands the State controlled portfolio of numerical games and reinforces earmarked public interest funding.
- Enhances the preventative and control functions of the ADM through the introduction of legally binding performance objectives and indicators in the Ministry-Agency conventions.
- Amends the 2025 framework by reallocating a share of the Pathological Dependency Fund to national monitoring, training, and prevention programs.

Compliance with Corporate Contribution Reporting Requirements

Brightstar fully complies with jurisdictional reporting requirements for political campaigns, political organizations, trade organizations, trade associations, or tax-exempt groups, allowing contributions to be reviewed for permissibility under the relevant countries' laws and reported in accordance with the laws of the relevant jurisdictions[1].

In 2025, Brightstar made contributions in multiple forms to entities in the U.S. and other non-U.S. organizations and events that have political, charitable, social welfare, or trade and business sector affiliations and missions, some of which have affiliations with government officials. Contributions included political contributions where permissible, charitable donations, membership dues, and sponsorships. All political contributions must be approved by the Government Affairs Committee (GAC), which is composed of at least six members at the SVP level who have been recommended by the Chair of the GAC to, and approved by, the CEO of Brightstar PLC. The Chief Compliance Officer and General Counsel of Brightstar or their designees and other Brightstar Employees designated by the Chair or CEO of Brightstar PLC may serve as ex-officio, non-voting participants of the GAC.

1 The Company does not generally receive grants from governments

Advancing Innovation in the Lottery Industry

Brightstar prides itself on being an innovative leader in the lottery industry, committed to providing customers with best-in-class products and services.

Brightstar's commitment to providing customers and players with new and engaging lottery products, solutions, and services is demonstrated across all lottery categories and the global market. The Company's research and development (R&D) efforts are reflected in its dynamic product roadmaps influenced by market and technology trends, and feedback from customers, retailers, and players. Brightstar gathers and evaluates ideas from these sources and incorporates selected enhancements of them in new releases, which are made available and configurable to all customers. New features are designed to meet the needs of different lotteries, aiming to enable customers to benefit from industry practices.

By taking this approach, Brightstar provides lotteries with tools that evolve at the pace of their business, avoiding the risk of applications that will become outdated over time. By handling customer localizations via configuration parameters rather than spending time and resources maintaining custom software codes, delivery processes are simplified and development teams are free to focus on new features and continuous product improvements. This approach also supports more efficient testing and implementation processes for lottery customers.

Digital Technologies Supporting Operational Efficiency

Brightstar is scaling a digital first, artificial intelligence (AI) enabled lottery ecosystem that is designed to support the reduction of environmental impacts and improve operational performance across retail and online touchpoints. Brightstar is committed to solutions aligned with internal sustainability objectives and regulatory expectations across retail and digital. It has implemented efforts aligned with this commitment that also enhance the player experience:

- Paperless playslips, cashless/contactless payments, mobile enabled prize payouts, and eWallet integrations support a more digital retail experience and may reduce the use of printed materials and manual administrative activities.
- Cloud modernization for iLottery highlights scalability and reliability that underpin high performance, lower friction digital operations.
- Eco-design product strategies emphasize energy efficiency and the consideration of materials with lower environmental impacts as part of Brightstar's climate action and circularity initiatives. In 2025, the Company reported circular economy outcomes that complement lifecycle assessments introduced for lottery terminals.
- Brightstar's Player Data Platform and Connected Play analytics yield granular, near real-time operational and behavioral insights that can feed sustainability metrics (e.g., digital versus paper transactions, logistics efficiency, and responsible gaming controls utilization).

By unifying mobile, retail, and omnichannel touchpoints, Brightstar provides a connected digital experience for players while enabling lotteries to access operational data that can support decision-making related to efficiency, digitalization, material use, and responsible gaming initiatives.



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Product Innovation as a Decarbonization Lever

As part of its product innovation activities, Brightstar has executed targeted environmental analyses, including life cycle assessment (LCA) and product carbon footprint (PCF) studies, to develop a data-driven understanding of the life-cycle impacts associated with its key products and services. In particular, PCF assessments have covered both physical and remote wagers for draw-based games, enabling the identification of key carbon emissions hotspots across the value chain, including materials sourcing and consumables.

These insights support the definition of targeted decarbonization opportunities and inform the adoption of eco-design principles, improvements in resource and energy efficiency, and the progressive transition towards dematerialized and digitally-enabled gaming solutions.

Innovations such as digital playslips, digital menu boards, and the LCA-driven development of the Retailer Pro S2 terminal are intended to reduce reliance on physical materials and support improvements in material efficiency across products and services. Further details are provided in the Climate Action, Biodiversity, and Circularity section of this report.

Resource Efficiency and Digital Functionality in Lottery Vending Machines

Brightstar's GameFlex 48™ self-service vending machine is a technologically advanced solution designed with efficiency and environmental considerations in the global landscape of lottery vending machines (LVMs). Combining a high instant game capacity with a compact per-bin footprint, the terminal is designed to optimize retail space utilization and support operational efficiency.

The GameFlex 48 LVM features a completely redesigned delivery system capable of selling 48 instant games and an unlimited portfolio of draw games. Its compact design—only slightly wider than the GameTouch™ 28 LVM—allows retailers to expand their game offering without increasing the space required.

Additional innovations include ticket-by-ticket activation for improved security, tracking, and inventory management, a customizable touchscreen for a more engaging player experience, and integrated payment options (cash, cashless, near field communication, and digital playslips) enabling a fully digital play ecosystem. The use of digital playslips facilitates a paperless purchasing process and may reduce the use of printed materials associated with gameplay.

The GameFlex 48 LVM incorporates features aligned with Brightstar's broader efforts related to digitalization, resource efficiency, and the consideration of sustainability criteria in product development and operational processes.

Expanding Digital Operations Monitoring with Dynatrace

In 2025, Brightstar continued strengthening its operations and accelerating its digital transformation by expanding the adoption of Dynatrace, an advanced monitoring platform. This evolution aligns not only with the Company's innovation strategy but also with its refreshed sustainability framework.

The platform now plays a central role in delivering operational resilience, energy-efficient digital performance, and data-driven service reliability across Brightstar's global lottery ecosystem. This shift reflects the growing adoption of data-driven monitoring and performance management practices across digital operations.

Throughout 2025, Brightstar expanded Dynatrace coverage to include the Gioco del Lotto, a system characterized by high transaction density, strict service-level requirements, and zero tolerance for downtime or latency. By the end of 2025, Dynatrace positioned Brightstar's IT operations as a proactive, data-driven, and innovation-ready function. This integration supports business continuity and digital excellence, while supporting Brightstar's sustainability commitments.

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Digital Process Integration with ServiceNow

In 2025, Brightstar continued to use ServiceNow, a cloud-based workflow platform that streamlines IT, human resources, and customer-centric processes. ServiceNow brings together workflow automation, AI, and mobile-first capabilities, supporting both operational efficiency and sustainability objectives across Brightstar's global footprint.

ServiceNow's 2024 deployment in Italy introduced three core modules: Customer Service Management, Field Service Management, and Enterprise Asset Management. These enabled the Company to consolidate previously fragmented capabilities and improve operational efficiency. This transition aligns with industry-wide modernization trends to integrate centralized, cloud-native technology to meet digital-first expectations.

By 2025, the Italian deployment reached a new level of maturity, enabling:

- A fully integrated device lifecycle management process., reducing reliance on third-party platforms and operational complexity.
- Streamlined end-to-end delivery and maintenance workflows, improving quality and expediting resolutions.
- Enhanced transparency and data governance supporting Brightstar's commitment to secure operations, consistent with global lottery standards.

By 2026, ServiceNow has become a cornerstone of Brightstar's strategy supporting process integration, operational visibility, and service management across the organization. This reflects broader sector trends toward digital integration, agile service operations, and cloud-based process modernization.

LotteryLink™: Digital Integration and Retail Efficiency

The evolution of retail lottery technology accelerated throughout 2025, driven by the industry's commitment to innovation, digital integration, and operations aligned with sustainability objectives. Central to this evolution is LotteryLink™, Brightstar's compact in-lane sales device designed to simplify and modernize how lottery products are sold at retail locations. LotteryLink offers retailers a compact alternative to traditional lottery terminals and incorporates digital functionalities that may reduce the need for printed materials associated with lottery transactions.

Industry research shows that retailers are increasingly interested in omnichannel-ready, space-efficient, and digitally-integrated tools to meet modern consumer expectations. LotteryLink fits these market dynamics by enabling instant and draw game sales directly through the retailer's existing point-of-sale device, without needing a dedicated lottery terminal, proprietary software installation, or hardware replacement. This level of convenience supports the sector's broader move toward simplified digital integration and faster deployment cycles, which are key benefits for operational resilience noted in lottery modernization studies.

LotteryLink incorporates features intended to support:

- Retail expansion into small format and non-traditional outlets.
- Enhanced consumer convenience with in-lane purchasing.
- Greater transparency in inventory and sales data.
- Resource-efficiency considerations through compact device design and reduced hardware requirements.

To address the increased need for innovation, Brightstar has established an Innovation Steering Committee, which provides senior leadership a consistent, structured opportunity to engage with and assess emerging technologies and make decisions on how to prioritize investments, allocate resources, and facilitate coordination among different teams.

Beyond products and services, innovation plays an essential role in improving systems and functions that are critical to the Company's operations. Brightstar has developed a state-of-the-art technological infrastructure to adequately support business activities across the value chain, from product and services design to data management, business intelligence, and systems integration.

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Embracing AI

As part of its innovation efforts, Brightstar continuously evaluates and adopts emerging technologies across the industry, including AI-enabled products and operations. While these technologies offer opportunities to support predictive capabilities, investment decisions, and operational efficiencies, the Company recognizes the importance of proactively managing associated risks.

Brightstar has embarked on a multi-year journey to adopt AI safely and efficiently, focusing on delivering measurable business outcomes through business transformation, not just technology deployment.

In 2024, Brightstar laid the groundwork for its digital evolution by finalizing its Generative AI Policy, guidelines, and controls to begin experimenting with subject matter experts. The Policy was designed to help employees make decisions about using generative AI tools.

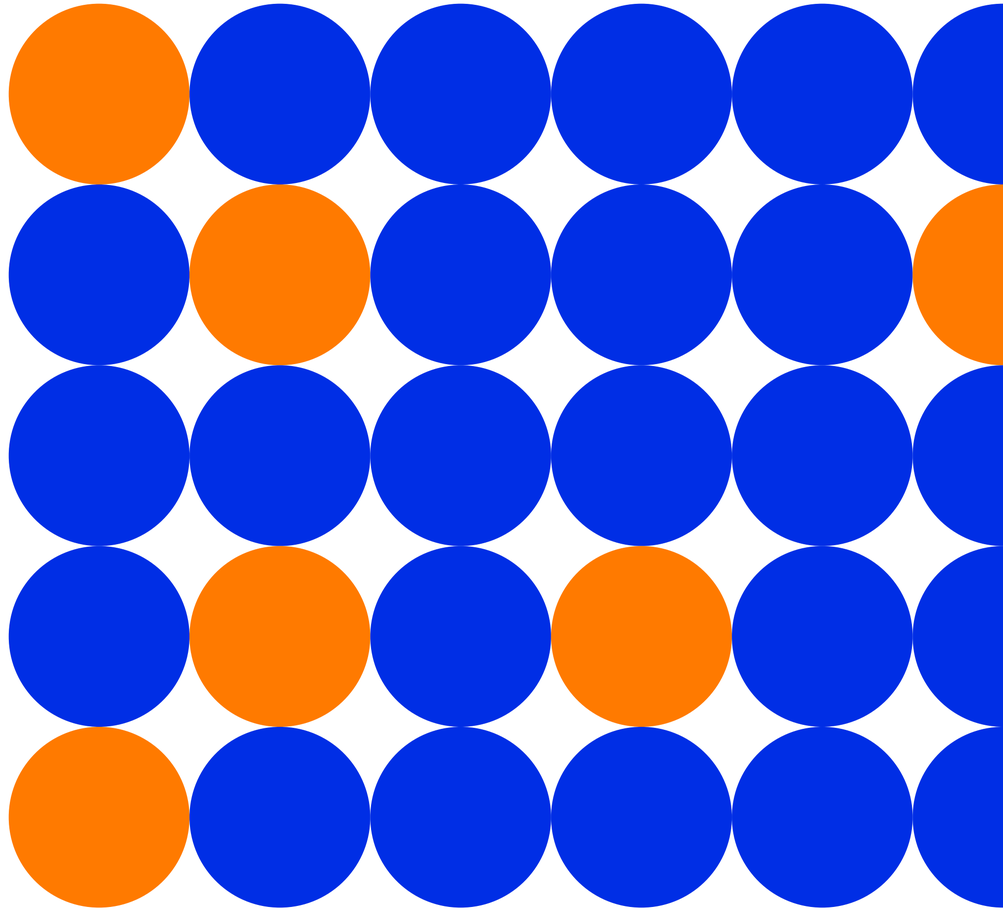
A targeted, mandatory training was released globally to guide employees through the ethical and responsible use of AI and generative AI.

In 2025, the Company implemented a dedicated AI governance structure, and accelerated the use of case-driven experimentation. Brightstar developed a comprehensive training program to equip leadership and employees with a solid understanding of effective AI prompting techniques and how AI can be utilized in their daily work. Enhancements continued through 2025, including a strong focus on measurable, Key Performance Indicator (KPI) driven progress against defined business objectives.

In 2026, Brightstar is committed to shifting the organizational focus from experimentation to scaling. Training has shifted from general awareness and basic knowledge to specific technical skills. The Company introduced “Section Coach,” a targeted AI-learning platform that supports employees in developing practical, hands-on expertise in advanced AI capabilities, which facilitates knowledge transfer and accelerates skill adoption across teams. Brightstar’s AI-related initiatives reflect broader market trends toward focused implementation and value-oriented deployment of AI solutions. Brightstar’s approach has matured to include policies on AI use enabled by technology, greater centralization of strategic alignment, and tighter alignment between in-process solutions and business strategy. In 2026, the company is also working on enhancing its policy around safe AI adoption, along with the deployment of a risk management tool.

Cross-functional Leadership Engagement

Brightstar has developed an operating model to engage leadership cross-functionally and make the organization capable of evaluating, prioritizing, and implementing AI initiatives aligned with defined business objectives. The goal is to prepare the organization to implement AI solutions that produce tangible business results against agreed-upon strategic objectives.



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Customer Engagement

Brightstar has earned the trust of its customers by maintaining high standards of integrity and compliance with laws and regulations in the jurisdictions where it operates. The Company takes time to understand its customers' priorities and goals, and engages with stakeholders to identify the most effective solutions to address their collective needs.

Brightstar maintains long-term, strategic customer relationships rooted in partnership and shared accountability. A core competitive differentiator is Brightstar's direct experience as a Lottery Management Agreement (LMA) and an operator in Italy, which gives the Company first-hand, end-to-end insight into player behavior, retailer needs, operational challenges, and regulatory realities. This perspective supports the development of practical solutions informed by operational experience. LMA jurisdictions serve as live innovation hubs, where new games, retail strategies, engagement models, and operational improvements are tested and validated before being scaled across the broader customer base, reducing risk and accelerating innovation. These capabilities are reinforced by embedded market research, continuous player and retailer insights, and closed-loop customer feedback, helping inform product, service, and performance improvements.

Brightstar hosts events at industry trade shows to better understand the ever-changing needs of customers. Customer meetings are regularly focused on the value Brightstar provides when communicating new ideas, products, or innovation to a market. Brightstar also invites lottery customers to complete performance scorecards on a quarterly basis to gather feedback and support continuous improvement of customer service. In 2025, Brightstar organized and participated in 20 industry events with customers. At the National Association of State and Provincial Lotteries (NASPL) Trade Show, attended by 260 lottery delegates representing 54 lotteries, Brightstar showcased retail solutions, instant ticket content and services, iLottery products, and future innovation ideas on the trade show floor. Brightstar also participated in the European Lotteries (EL) Congress, with 233 attendees representing 63 lotteries.

In addition to in-person engagement, Brightstar maintained regular, direct communication to customers through targeted email outreach in 2025, distributing 31 communications to an average audience of approximately 380 contacts across 87 lotteries. These emails shared a range of Brightstar produced content, including research and thought leadership materials, industry editorials, product-related updates, operational and promotional insights, and event-related communications. Engagement across this outreach averaged a 30% open rate, an 8% click-through rate, and a 36% click-to-open rate, complementing other engagement activities by providing timely access to information, insights, and resources aligned with



Listening to Customers

The Company consistently seeks feedback from customers to improve its products and services. Customer satisfaction (CSAT) surveys are part of Brightstar's ongoing efforts to continuously improve its products and services. This feedback enables Brightstar to understand how well it is meeting customer needs and identify products and services that require improvements.

Since 2024, Brightstar has committed to annual Global Customer Satisfaction sutdies. In even-numbered years, the study focuses on the iLottery and printing business units, and in odd-numbered years, the study encompasses all facets of Brightstar's lottery operations. In 2025, Brightstar contracted an independent professional market research firm to collect objective feedback via a global study from lottery, iLottery, and printing customers, as part of the effort to formally gauge global satisfaction of Brightstar's products and services.

The last global CSAT study was conducted between May and August 2025, with results shared in October. Brightstar collected insights from 173 directors and managers from 54 lotteries on six main areas and 23 dimensions of evaluation. The response rate was 59%, on par with previous response rates. In addition, the Company streamlined the question areas, allowing participants to focus on areas within their direct area of responsibility while streamlining the survey experience. Brightstar's score for CSAT was 90%, which is considered very strong based on the independent research firm KS&R, whose benchmark indicates that an overall satisfaction score of over 75% is considered highly positive.

For customer-initiated studies, Brightstar meets with the chosen vendor to ensure the customer's goals and objectives are identified. Once the project has been executed and research report findings are obtained, Brightstar shares the results with the customer to facilitate discussion of key insights and potential actions from the study. For corporate studies, Brightstar follows the same process with its internal stakeholders included as part of the kickoff and debrief process.

In 2025, Brightstar continued to support research efforts undertaken by customers, with the number of studies consistent with previous years. The Company continued to see an influx of new primary research requests for support from lottery customers in the areas of concept evaluation, general consumer, retailer, and customer feedback, and strategic planning initiatives, particularly related to game development.

Brightstar also supported corporate initiatives through the execution of a Thought Leadership Study and contributed to the strategy and planning of various equipment and solutions offered to lotteries. Brightstar's Global Insights team executed studies that included Attitude and Usage Studies, retailer focus groups, and player focus groups. In tandem with those efforts, the Company continued to support its customers through managing and executing several pieces of ongoing research, including tracking, ad hoc research, and iLottery studies.

In 2025, Brightstar held its Instant Ticket Workshop in Lakeland, Florida, where instant product managers from the U.S. and Europe shared challenges and successes. The two-day event included a tour of Brightstar's advanced printing facility to see the latest developments in instant ticket production, quality, and security. Designed specifically for lottery product managers and professionals seeking to enhance their instant ticket strategies, the workshop offered a forum for peer presentations in a casual business setting, allowing for focus and further group exploration.

Informing a Continuous Improvement Process

Brightstar engages with customers, retailers, and players through structured Global Customer Satisfaction studies, market research programs, retailer and player studies, and ongoing operational interactions. These engagement activities identify key topics and concerns, inform response actions, and guide continuous improvement.

- Service quality, support, and responsiveness: Brightstar addresses these topics through a closed-loop CSAT process, using account-level scorecards and leadership-owned action plans to drive service improvements. Key themes and response actions are reflected in Brightstar's Sustainability Report and related disclosures.
- Alignment to customer priorities and needs: Feedback is used to inform product roadmaps, service delivery priorities, and innovation focus areas, with progress monitored through recurring CSAT cycles and internal governance reviews.
- Retail execution and in-store experience: Retailer input is incorporated into solution design, retailer tools, and operational enhancements, supported by ongoing research and reflected in Brightstar's reporting on customer and retailer engagement activities.
- Player experience and evolving preferences: Player insights inform game development, engagement strategies, and solution enhancements, with outcomes incorporated into broader customer programs and public reporting where relevant.

A B2C Research Approach in Italy

In Italy, Brightstar follows a B2C approach in supporting research requests, and conducted approximately 100 studies to test new ideas, concepts, and games. For the past 15 years, Brightstar in Italy has been conducting the "Osservatorio Giochi," a cross-sectional player behavioral study about all cash-winning games in the Italian market.

Responding to Customer Needs

Brightstar's customer needs differ based on their size, location, available services, status, and national and local jurisdiction-based regulations. For this reason, Brightstar continuously adapts its services, people, and processes to address evolving customer needs.

Field Services

Brightstar's Global Field Services is a full-lifecycle department covering all aspects of support to lottery retailers, including lottery point of sale and system support, and retail network infrastructure.

Field Services employees perform retailer device installation, preventative maintenance, removal, relocations, remote support, training, and technology upgrades. Brightstar's comprehensive service plan begins with reliable equipment, innovative peripherals, and a robust communications network.

The Field Services organization applies three principles to every aspect of its quality process to reduce issues and provide industry-leading uptime, whether during normal daily routines or record-breaking jackpots:

- Field Services standards outline all Field Service Technician (FST) responsibilities and performance requirements, including procedures for performing service visits and preventive maintenance on all equipment serviced by Brightstar. They also include training to be followed by FSTs when working with peers, customers, and third-party resources. Field Services standards help every FST provide the highest level of service across the retailer base, regardless of the type of equipment being serviced.
- Performance levels and expectations are set according to Field Services standards, such that staffing levels are periodically reviewed to help maintain adequate local service coverage. Brightstar understands the importance of staffing each customer base with an appropriate number of FSTs to match demand.
- Staffing levels and performance measurements are constantly reviewed against statistics and trends to maintain staffing levels aligned with operational needs. Field Services leadership measures the performance of each staff member and the team as a whole to provide guidance and feedback. The local Field Services management team then provides performance reports to the customer for full transparency and accountability.

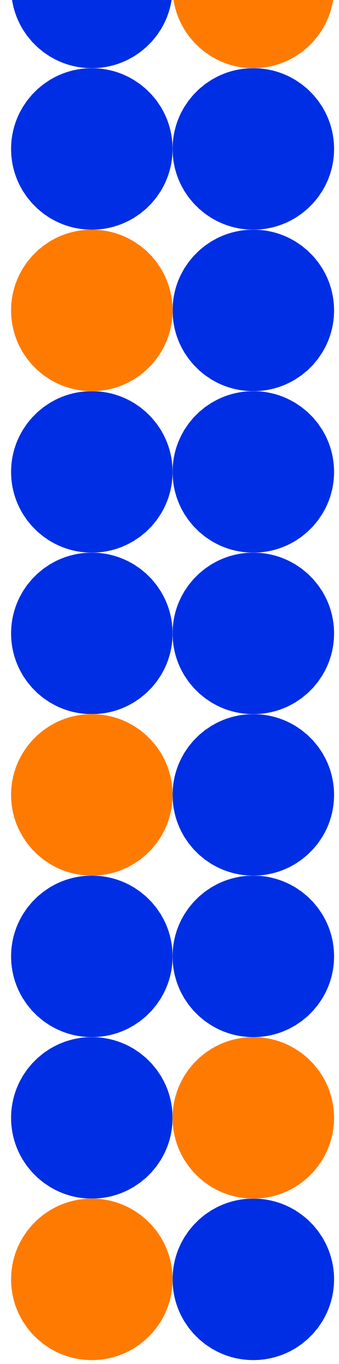
Field Services operations provide equipment training, complementing the retailer training program delivered by Brightstar's Learning Services group.

Brightstar designs all point of sale hardware and equipment with longevity, reliability, and durability in mind. By incorporating decades of real-world experience into product designs, Brightstar aims to mitigate critical points, lower the total cost of ownership, and strives to deliver reliable terminals and peripherals based on design and operational considerations. Brightstar's strategy has reduced both the number of visits made by FSTs for product installations and the core materials used over the license period.

Brightstar maximizes device lifetime and consolidates the supply chain by recycling parts, which supports resource efficiency, cost management, and waste reduction efforts through recycling and refurbishment practices. This contributes to resource efficiency by extending the useful lifespan of devices. Brightstar runs Recycling and Refurbishment Centers of Excellence from the Company's global repair hubs. These sites organize the distribution of used parts to other global Brightstar sites, which involves identifying and implementing reuse, redistribution, and refurbishment of resources and devices, an approach aligned with the Company's material circularity objectives, where feasible. In 2025, processing centers were set up to accomplish these goals and saw more than 15,000 assets being completed through this process.

Since 2021, Brightstar has been working on Field Services optimization to introduce new ideas, solutions, and efficiency opportunities. The projects are expected to yield substantial gains across several key areas, including:

- Expansion of retailer self-service capabilities, supporting greater autonomy and operational efficiency.
- Examination of service models, which is expected to result in more standardization, compliance, and control, allowing personnel to be solution-oriented instead of chasing issues.
- Data management through better collection, collation, and analysis, which is expected to generate improved efficiency and information sharing..
- A focus on talent by creating a clear understanding of skill and proficiency level differences and compensation pathways, which is expected to support workforce engagement.



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Field Services conducts regular performance checkpoints with each Brightstar general manager across jurisdictions. In 2024, a bi-annual general manager scorecard was introduced to enhance these reviews. The scorecard incorporates feedback from sites and lottery customers, helping shape action plans and guide Field Service initiatives.

Brightstar field and contact center services adhere to and exceed service-level agreements based on individual site contracts with lottery customers. As in past years, the Company exceeded the contractual service levels in 2025.

Field Services metrics are measured by specific calculations and weighted averages based on jurisdictional and contractual requirements. Brightstar utilizes a general customer satisfaction survey that includes a review and evaluation of field services. Customer satisfaction can be measured through customer surveys, direct feedback, and customer retention. Additionally, specific customer feedback is done at the site level. Brightstar applies a self-imposed target of 98% on-time call completion as part of its service management approach. Internal key performance indicators (KPIs) include, but are not limited to, expense management, inventory control, and depot repair rates.

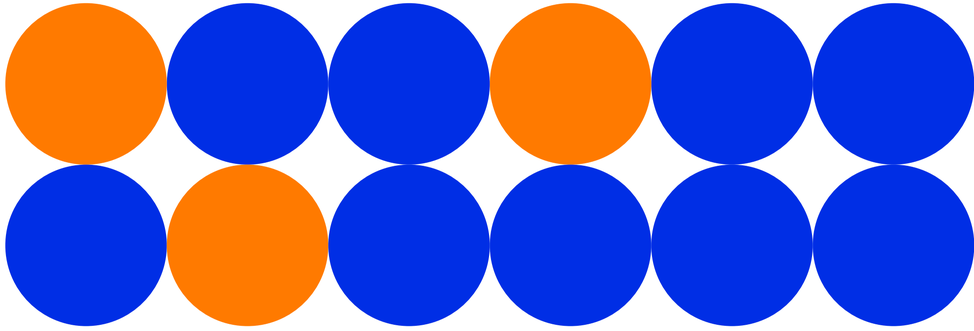
In Italy, Brightstar monitors satisfaction through a semiannual customer scorecard and data-driven performance measurements. The day after a visit from a Brightstar technician, retailers are asked to express their satisfaction with the technician's courtesy, overall service, and technical and listening skills. Additionally, the Italian Repair Center (IRC) repairs devices and peripherals that are returned following the assistance activities of FSTs. Their focus areas are to diagnose any faults, restore normal functionality through maintenance interventions on hardware or software, and direct the processing of any faults to the manufacturing companies. In 2025, the IRC handled 3,500 repairs of broken devices.

Field Services continues to expand in scope and depth. In 2025, Field Services implemented a comprehensive set of solutions designed to support quicker intervention for lower down-time, immediate omnichannel support, smart maintenance processes, and technologies for higher equipment reliability and greater data transparency.

Brightstar's remote solution capabilities have been enhanced and rolled out to customers in North America. The Company introduced new tools utilizing the advanced AI capabilities to optimize technician scheduling and routing, and the increased ability to diagnose hardware issues and automate business processes. The predictive maintenance program continues to evolve, with an emphasis on real-time data predicting potential failures, instead of fixed timetables, to support device reliability and uptime through AI-powered models.

In Italy, Brightstar integrated a transversal telemetry system on a set of devices designed to enable the provision of "Gioco del Lotto" and "10eLotto" services to allow hardware to be monitored remotely both during delivery and assistance. Data from main equipment can be stored in the new customer relationship management (CRM) tool, ServiceNow, and made available, through dedicated dashboards, to first- and second-level operators. This supports more informed maintenance interventions, automation opportunities, and improved visibility of POS performance and issue resolution activities. The collection of asset information and real-time monitoring enable the prediction of future equipment performance, intervention on issues before they occur, the identification of the main root causes of malfunctions and effective anomaly management, the definition of priorities within an increasingly accurate and well-balanced maintenance program aligned with operational needs, and targeted investment in asset monitoring aimed at supporting operational efficiency and cost management.

Brightstar Field Services has a comprehensive training program that covers technical and professional competencies. Because FSTs are the face of the Company to retailers, it is essential that interpersonal, collaboration, adaptability, initiative, analytical thinking, and leadership skills training are provided.



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Contact Centers

Brightstar's contact centers provide 24/7 business assistance and effective procedural safeguards to all locations where the Company operates. The contact centers are designed to maximize customer satisfaction, while supporting responsible gaming and compliance.

Contact centers and dispatch teams in multiple geographic locations provide service in local languages to enhance the customer experience and disaster recovery capabilities. This solution supports timely responses, customer service delivery, and efficient call management.

Each contact center site has its own disaster recovery plan, and a documented strategy for maintaining or quickly resuming operations in the event of disruptions such as power outages, cyberattacks, or natural disasters. This is typically a set of operational procedures, with key elements that include conducting a business impact analysis, establishing recovery time and access goals, enabling or switching remote agents, implementing policies, activating backup data, and establishing a communication strategy for staff and customers.

The contact centers generate daily performance reports and hold weekly meetings to review the previous week's performance. Service-level metrics provide insight into any problems that occurred in the previous week. The contact centers also generate annual performance reports to assess overall performance for the year.

B2B Contact Centers

Brightstar's global B2B contact centers are the main point of contact for retailers, lottery representatives, and customers who need assistance with their equipment, issues, troubleshooting network and/or communications problems, processing supply orders, or general questions. B2B contact centers are located in 13 global locations. All agents have the ability to work from home which allows for a greater coverage and improved working conditions. The National Response Center (NRC) provides support to lottery retailers and global incident management and is certified to be compliant with ISO 27001, the international standard for information security management, and ISO 20000, the first internationally recognized standard for IT Service Management (ITSM).

The NRC has hubs in North America supporting Brightstar's business in the U.S. All NRC associates are trained to provide technical support to all 26 lottery retailer jurisdictions. In 2025, the NRC was tasked with retailer break or fix resolutions, status updates, consumable and instant ticket supplies, and supporting the Company's incident management function. The NRC has a supervisory and quality team that evaluates jobs monthly to assess process adherence and consistency, and the workforce management team monitors service level performance in real-time. Contact centers have been enhanced to support better remote resolution and retailer self-service.

The NRC competed in ContactCenterWorld's global competition in 2025. ContactCenterWorld is the global association for contact center best practices. Brightstar was named Best In-House Contact Center and received Gold in the Best In-House Technology Innovation category for the Americas.

Since 2024, the NRC's Engage platform has greatly improved its efficiency and daily processes. With its centralized interface and automated workflows, Engage reduced manual data entry and supported greater process consistency.. Real-time access to reports within the tool provides Brightstar with better visibility into performance metrics, allowing the team to easily pull data on an ad-hoc basis. The tool has application programming interface connections which allows the team to enhance troubleshooting capabilities by sending remote resets to retailers' communication devices.

Brightstar's contact centers produce daily reports to monitor the quality of service, with data profiled according to the type of business, the channel of origin of the contact, and the type of contact. All reports for specific expertise and assistance are also available to managers. Periodically, the contact centers provide descriptions of their procedures and case studies to Brightstar's audit and control team. Each contact center periodically sends reports to all stakeholders that certify control of the overall performance. Metrics are reviewed on a weekly and monthly basis, while quality assurance is performed on incoming calls for proper procedures.

The contact centers responsible for Latin America and Caribbean lotteries and commercial services are based in Chile, Jamaica, Mexico, and Trinidad and Tobago. They provide support for Brightstar's systems and terminals located in retail locations.

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In Jamaica Brightstar launched a new telco system called the Genesys cloud solution, which opens new communication channels for customers including email, chat and automated chats. In Jamaica, Brightstar introduced an auto dispatch solution for any service call requiring a technician visit through Brightstar's CRM solution, Cadence.

The Europe, Middle East and Africa (EMEA) contact center is the main point of contact for retailers, lottery representatives, and customers in that region. The EMEA contact center maintains appropriate communication service level agreement and remotely accesses devices to support device monitoring and issue resolution, helping reduce the need for on-site service visits. Brightstar is the creator and supplier of a system for full Field Services process management and a mobile application for FSTs.

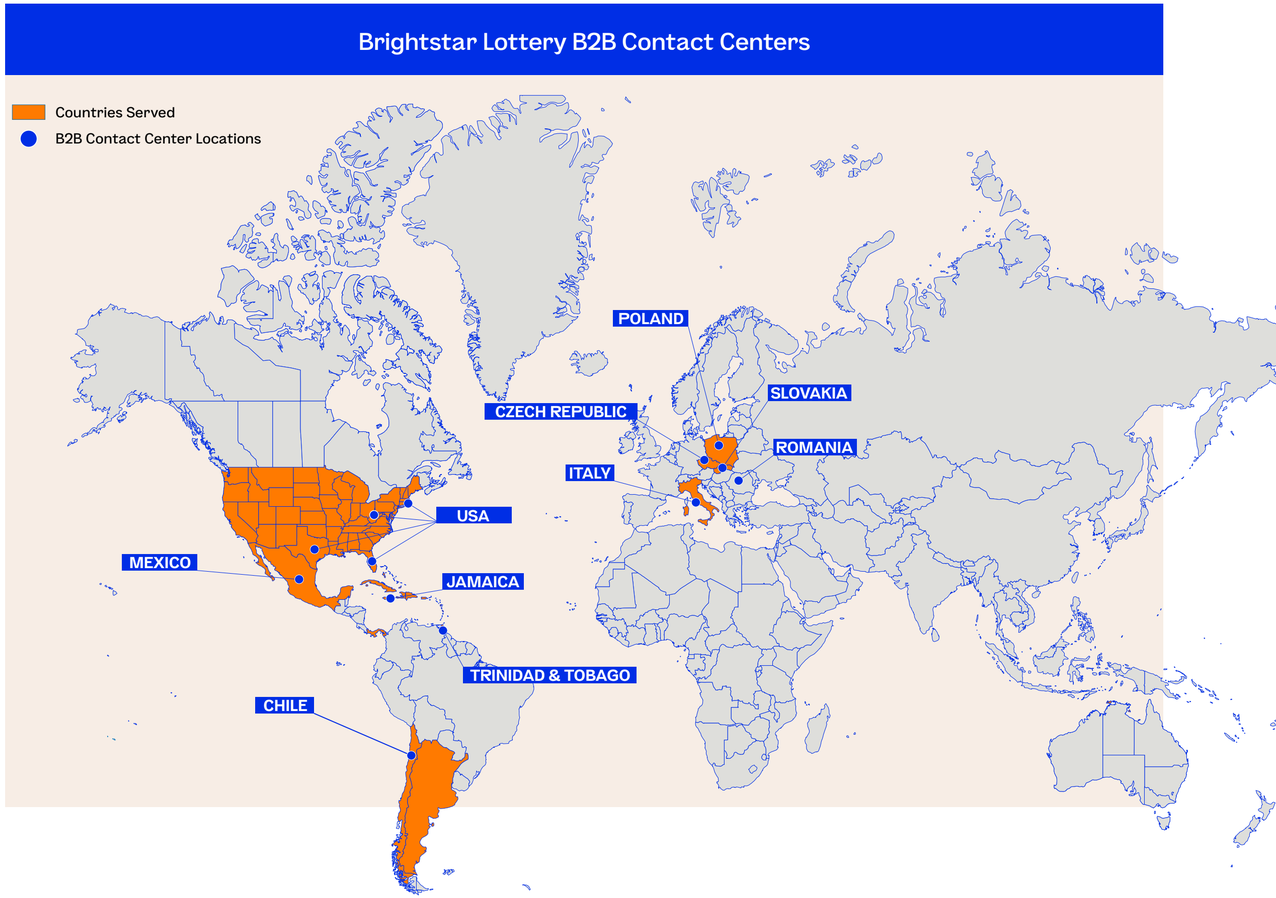
The contact center based in Italy, and partially served by an outsourced vendor in Romania, provides information and technical desk services for Gioco del Lotto and Gratta e Vinci points of sale. In 2025, operations in Italy achieved the renewal of ISO 18295-1 and 18295-2 certifications. ISO 18295 is a two-part international standard for customer contact centers. ISO 18295-1 focuses on the requirements for the customer contact centers themselves, while ISO 18295-2 focuses on the requirements for organizations that use those centers. These certifications demonstrate that the contact center meets specific quality and performance benchmarks.

In 2025, the Italian contact center's strategy evolved through:

- Migration to a new CRM platform. Using the new ServiceNow CRM platform supported a more integrated user experience for contact center agents, providing end-to-end management of customer service processes for retailers and the entire contact center area in a single platform. The platform includes a dedicated reporting section for monitoring individual activities, accessible directly to the contact center agent.

- Implementation of the VoiceBOT system called DIGIT. This process started in February 2025 with a basic system for 2,500 POS terminals, providing assistance only to requests related to Gioco del Lotto consumable orders. Since July 2025, the service has been extended to over 10,000 POS terminals, which can communicate with DIGIT for both Gioco del Lotto information and technical selections. This new system provides opportunities for support service outside operating hours.

- Evolution of the virtual agent solution and ongoing development of the proactive interactive voice response (IVR) platform.



B2C Contact Centers

Brightstar's B2C contact centers provide multichannel assistance to lottery and iLottery players worldwide. This support is offered through four B2C contact centers, spanning several countries and in four different languages: English, Spanish, French, and Italian. These contact centers focus on responsible gaming, compliance, and customer satisfaction, while providing information and support to players where applicable.

Brightstar's B2C contact centers are managed by a dedicated team which utilizes several local operational sites in the U.S., Canada, India, and Italy, as well as outsourced centers in Romania. This model supports specific talent pool availability, with trained, experienced, and appropriately licensed staff. Brightstar's contact center management seeks to provide working environments that support employee well-being and operational requirements, including regulatory-compliant workspaces and ongoing training.

Performance is measured using the same KPIs across each location. A monthly report keeps track of performance and emerging issues at each contact center. Key data points include phone call response rate, chats conducted, emails sent within a specific timeframe, and the rate of incoming issues resolved during the initial response.

In the U.S., 97% of customers use voice assistance, with the remaining 3% using other channels including chat and automation. Internationally, 98% of customers use voice assistance while the remaining 2% use other channels.



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ESG Rating Scores

Sustainability efforts are routinely evaluated by environmental, social, and governance (ESG) rating agencies to validate the Company's initiatives and rate its performance within the lottery industry.

The following ESG rating scores were achieved as of June 30, 2026, and represent Brightstar's commitment to sustainability.

- FTSE Russell is a leading global provider of benchmarks and indices across asset classes and investment styles. Its ESG ratings and data model allow investors to understand a company's exposure to, and management of, ESG issues in multiple dimensions. In June 2026, Brightstar achieved an ESG Score of 4.3 out of 5, above the average score of companies in the Gambling subsector.

- ISS-oekom ESG Corporate Rating provides relevant and forward-looking ESG data and performance assessments. Drawing on an overall pool of about 700 standard and industry-specific indicators, ISS applies approximately 100 ESG-related indicators. The ESG performance score is the normalized numerical representation of the alphabetic ratings (D- to A+) on a scale of 0 to 100. Brightstar earned the C+, or "prime," level.

- MSCI ESG Ratings are designed to measure a company's resilience to financially relevant, industry-specific sustainability risks and opportunities. The rules-based methodology identifies industry leaders by assigning each company a letter rating from CCC to AAA based on how well they manage such risks and opportunities relative to peers. In March 2026, Brightstar received the highest possible rating of AAA.

- CDP is a global non-profit organization that provides a platform for companies, cities, states, and regions to manage their environmental impacts and disclose information to stakeholders. CDP encourages organizations to voluntarily report their environmental performance and impacts, including those related to climate change, water security, and deforestation. On a scale of D- to A+, Brightstar received a Management level score, B for the CDP Climate Change and B- for the CDP Water, recognizing the Company for taking coordinated actions on such environmental topics.

- Morningstar Sustainalytics' ESG Risk Rating provides a multi-dimensional assessment of a company's exposure to and management of industry-specific material ESG risks. A transparent methodology categorizes risks into five severity levels, offering an absolute measure of risk. Brightstar was rated a low-risk company with a score of 16.2.

- The S&P Global Corporate Sustainability Assessment (CSA) leads the field in helping companies make the link between sustainability and their business strategies. Covering over 12,000 companies globally, the CSA is an annual assessment of a company's sustainability practices. On a scale of 0 to 100, Brightstar received a score of 56, and has been included in the 2026 S&P Sustainability Yearbook that distinguishes those companies within their industries that have demonstrated strengths in corporate sustainability.



Tax Strategy Deployment

Brightstar is committed to observing all applicable tax laws, regulations, and disclosure requirements, and strives to ensure the preparation and filing of all required tax returns in an accurate and timely manner. The Company believes in responsible tax behavior, with the taxes it pays contributing to local economies and supporting the development of the many countries in which Brightstar operates.

Brightstar's tax strategy[1] adheres to the following key principles:

- Apply diligent professional care and judgment to reach well-reasoned conclusions, ensuring that all decisions are taken at an appropriate level and supported by documentation of the facts, conclusions, and risks involved.
- Do not implement structures in tax havens for tax avoidance purposes. Brightstar may engage in legitimate tax opportunities that are aligned with commercial and economic activities and may take advantage of tax incentives offered by governments.
- Commit to complying with all relevant tax laws and regulations worldwide, adhering to both the letter and spirit of the law. Pay no more or less than the taxation required by law.
- Pay taxes in the countries where Brightstar's activities take place, fully adhere to the Organization for Economic Co-operation and Development (OECD) transfer pricing guidelines, and ensure transactions between Brightstar's operating companies are based on the arms-length principle.
- Have a transparent, open, and constructive relationship with tax authorities. Brightstar has cooperative compliance relationships with tax authorities in the UK and Italy.

Tax Governance & Risk Management

Brightstar has clear tax policies, procedures, and internal controls in place. Internal control procedures and processes are subject to regular reviews by internal and external auditors.

The Chief Accounting Officer (CAO) is responsible for the Company's tax strategy. Specifically, the CAO ensures that an appropriate framework is in place for the implementation of the strategy, and he is responsible for the oversight of the identification and management of tax risk.

The Brightstar Tax team, led by the Vice President of Global Tax, is responsible for the execution of tax-relevant activities and supporting the business functions in all initiatives under consideration and proposed business transactions, in order to achieve the strategic tax goals, in accordance with Brightstar's risk appetite. Brightstar employs appropriately qualified and trained tax professionals with the right level of tax expertise and understanding of Brightstar's business, ensuring the continuous development of Brightstar's personnel. All Tax team members proactively act to ensure and continually improve Brightstar's tax risk decision making. The Brightstar tax team may also, from time to time, engage external advisors to provide opinions on the tax implications of transactions where the interpretation of tax law is uncertain, ensuring compliance with relevant tax laws or filing requirements.

Risk Appetite and Attitude towards Tax Planning

Brightstar manages risks to ensure compliance with legal requirements and ensure it pays the correct amount of tax. The Company does not engage in artificial tax arrangements that lack commercial purposes to secure a tax advantage. Brightstar is committed to consistently meeting its regulatory and other tax obligations and acting in a way which upholds its reputation as a responsible corporate citizen.

The aim is to ensure full compliance with all statutory obligations while minimizing risks wherever possible.

Brightstar considers tax risks as financial, reputational, and compliance risks. Compliance with applicable tax laws and regulations is an overriding principle. The Company does not tolerate tax evasion, nor the facilitation of tax evasion by any person acting on Brightstar's behalf. Where there is significant uncertainty or complexity in tax legislation, the Company seeks advice from external experts to ensure the accuracy of its tax returns. Where appropriate, it also pursues upfront certainty by reaching agreements with tax authorities.

Approach to Interaction with Tax Authorities

As part of its commitment to maintaining a transparent relationship with tax authorities, Brightstar engages with such authorities honestly, fairly and cooperatively. For example, it maintains an open dialogue with its customer relationship manager at His Majesty Revenue & Customs (HMRC) in the UK and meets throughout the year to discuss current business initiatives and transactions.

Brightstar also participates in the Italian Tax Cooperative Compliance Program to establish and foster a relationship between the Company and the Italian Tax Authorities and achieve the highest level of voluntary tax compliance.



Tax-compliance Culture at Brightstar in Italy

The culture of tax compliance is one of the defining elements of the Tax Control Framework (TCF) adopted by Brightstar. This framework provides a monitoring process for verifying the effectiveness of the tax-risk control model in place. Brightstar in Italy provides training for individuals who operate within the tax area and for those working in other functions that may be involved. The objective is to foster a corporate culture based on compliance with tax legislation and a clear understanding of the tax risks to which the Company is exposed in pursuing its business objectives and strategies.

1 The tax strategy is publicly available on the Company's website: https://s205.q4cdn.com/821653831/files/doc_downloads/tax_strategy/Brightstar-Lottery-PLC-2025-UK-Tax-Strategy_Final-12-15-2025.pdf

Governance and Business Integrity



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Governance and Business Integrity

Brightstar Lottery is a trusted partner to governments and regulators around the world and adheres to the highest standards of service, integrity, and responsibility. The Company is committed to growing its business responsibly by implementing a structured and dedicated governance framework, which includes high standards of sustainability practices.

Brightstar is committed to acting ethically in all business activities and dealings with government officials, customers, and third parties. Ethics and integrity are the foundation for Brightstar's operations and the prerequisites for success in the lottery industry. Brightstar's reputation as a responsible supplier of lottery products and services is critical to its success.

Brightstar has comprehensive policies and procedures that prevent and mitigate potential negative impacts from its operations. Brightstar strives to prevent fraudulent, anti-competitive, and corrupt behaviors by requiring all employees to conduct business with integrity and high ethical standards. Similar policies, procedures, and requirements apply to Brightstar's suppliers. Risk mitigation features and capabilities are embedded in a system of codes, policies, guidelines, and best practices to protect customers, employees, players, suppliers, and the environment.

Brightstar's risk management process aims to ensure a clear understanding of potential risks that may hinder the achievement of strategic, financial, and operational objectives. Earning and maintaining the trust of customers and players is paramount in Brightstar's operations, reflected in the policies and procedures adopted for protecting personal data and business continuity. Cybersecurity monitoring and prevention activities are key aspects of Brightstar's commitment to responsibility and are in place to prevent breaches and safeguard personal and confidential information.



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Corporate Governance

GRI 2-9; GRI 2-10; GRI 2-11; GRI 2-12; GRI 2-13; GRI 2-14; GRI 2-17 GRI 2-18

Brightstar Lottery PLC's Articles of Association provide that, for as long as its ordinary shares are listed on the New York Stock Exchange (NYSE), the Company shall comply with all NYSE corporate governance standards set forth in Section 3 of the NYSE Listed Company Manual applicable to non-controlled domestic U.S. issuers, regardless of whether the Company is a foreign private issuer (as it currently is).

As of December 31, 2025, the Company's Board of Directors (the Board)[1] was composed of 12 members: Executive Chair Marco Sala, Vice Chair and Lead Independent Director James McCann, Chief Executive Officer (CEO) Vincent L. Sadusky, Chief Financial Officer (CFO) Massimiliano Chiara, Alberto Dessy, Enrico Drago, Ashley M. Hunter, Heather J. McGregor, Lorenzo Pellicioli, Maria Pinelli, Samantha F. Ravich, and Gianmario Tondato Da Ruos. Of these Directors, seven are independent - James McCann, Alberto Dessy, Ashley M. Hunter, Heather J. McGregor, Maria Pinelli, Samantha F. Ravich, and Gianmario Tondato Da Ruos; and five are non-independent - Marco Sala, Vincent L. Sadusky, Massimiliano Chiara, Lorenzo Pellicioli and Enrico Drago.

Subsequent to the end of the 2025 financial year, and effective February 19, 2026, Maria Angela Zappia was appointed to the Board as an independent non-executive director and as a member of the Nominating and Corporate Governance Committee (NCGC), succeeding Samantha Ravich, who was appointed to the Audit Committee (AC). Massimiliano Chiara stepped down as a director of the Company at the conclusion of the Company's 2026 annual general meeting on May 12, 2026, but continues to serve as CFO.

As of May 31, 2026, the Board is comprised of eight independent directors, and four non-independent directors - Marco Sala, Vincent Sadusky, Lorenzo Pellicioli, and Enrico Drago[2]. The Board is Brightstar's highest governing body responsible for the management of the Company's business. It has broad responsibilities over the Company's organizational structure, strategic goals, and risk profile to pursue long-term value creation and business growth while honoring commitments to stakeholders.

The Board is led by the Executive Chair, who ensures that corporate governance practices are aligned to U.S. and UK standards - including as it relates to sustainability initiatives - and assists the CEO in pursuing the strategic goals set by the Board.

As a key liaison between the Executive Chair and the independent Directors, the Lead Independent Director typically leads the executive sessions of the Board (his role and authority are described in greater detail in the Corporate Governance Guidelines available on the Company's website).

Day-to-day operations are delegated to the CEO, who is supported by senior management equipped with authority within specified parameters which are reviewed annually by the NCGC.

The Board is supported by three standing committees: the AC, the Compensation Committee (CC), and the NCGC. Each committee is made up of independent directors, with a clear framework of delegated responsibilities as set out in their respective charters available on the Company's website. The Board receives regular updates, advice, and proposals on matters for analysis and discussion, either through each committee or directly from management, covering areas such as financial results and forecasts, major contracts and bids, capital market and financing opportunities, enterprise risk management (including cybersecurity), sustainability, human capital management, Board composition, corporate policies, and investor relations.

The AC assists the Board in overseeing:

- Brightstar's accounting and financial reporting processes and audits of financial statements.
- Brightstar's compliance with legal and regulatory requirements.
- The qualifications, independence, and performance of the independent auditors.
- The adequacy and performance of the internal audit function.
- The Company's internal controls over financial reporting and systems of disclosure controls and procedures.

The AC is also responsible for overseeing the Company's enterprise risk management, which includes the assessment and management of climate-related risks, and ethical codes of practice.

Each member of the AC must meet the financial literacy requirement, as such qualification is interpreted by the Board in its business judgment, or must become financially literate within a reasonable period after their appointment to the committee. At least one member of the AC must also have accounting or related financial management expertise, as interpreted by the Board in its business judgment. As of February 2026, the Board determined that three members of the AC qualified as audit committee financial experts as defined under the rules of the U.S. Securities and Exchange Commission.

The CC assists the Board in discharging its responsibilities relating to compensation of the Company's directors and senior management, and in overseeing the Company's broader compensation policies. The CC also provides oversight on human capital management matters, including management succession planning, employee engagement, and talent, culture and inclusion.

The NCGC has responsibility for Board succession planning, and advises and make proposals regarding individuals qualified to potentially become members of the Board and its committees, consistent with criteria set forth in the Company's Corporate Governance Guidelines. At least annually, as part of its review of the structure, size, and composition of the Board, the NCGC assesses the balance of skills, experience, tenure, independence, and commitment among the existing directors in light of the Company's strategic direction.

1 All directorships in external publicly traded companies and positions and/or commitments held in holding companies which are deemed significant are summarized below.
As of 31 December 2025: M. Sala: (i) De Agostini S.p.A. (Board member); (ii) DeA Capital S.p.A. (Board member) - both companies are not listed; Lorenzo Pellicioli: (i) De Agostini S.p.A. (Board member) – not listed; (ii) Assicurazioni Generali S.p.A. (non-executive director ("NED")); Enrico Drago: (i) De Agostini S.p.A. (Executive Chair); (ii) DeA Capital S.p.A. (Chair) – both companies are not listed; James McCann: 1-800-Flowers.com (Chair); Maria Pinelli: (i) Globant S.A. (NED), (ii) Archer Aviation, Inc. (NED).
2 Please see https://ir.brightstarlottery.com/esg/Board-of-Directors for current composition of the Board and https://www.brightstarlottery.com/who-we-are/leadership for current senior leadership team

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The NCGC also assists the Board in overseeing Brightstar's corporate governance framework and its sustainability strategy, including monitoring the implementation of its sustainability program and reviewing its annual sustainability report[3].

The combined skills and experience of the Board, as reported by the individual directors, include international and other public company experience, accounting and financial reporting, legal and regulatory, digital technology, and environmental, social and governance (ESG). Directors are encouraged to attend continuing education programs designed for directors of publicly traded companies and/or internal sessions designed for Brightstar, covering a range of topics which may be beneficial to the directors' roles and responsibilities, including their role as committee members. In 2025, informative sessions were offered to the Board and its committees, including through external advisors and subject matter experts, to assist the directors in their effort to guide the Company in a dynamic business environment. Building on the educational session on Artificial Intelligence (AI) attended by the directors in 2024, the 2025 program provided a follow-up on the most recent AI trends, barriers to adoption, implementation risks, and strategic opportunities for the Company.

The Board conducts an annual self-evaluation process to assess its performance and the performance of its committees and individual directors. The NCGC determines the evaluation approach and methodology to be used, oversees the process, and shares the results with the Board. The NCGC reported the results of the 2025 evaluation to the Board and continues to monitor the implementation of any identified follow-up actions.

	Audit Committee	Compensation Committee	Nominating and Corporate Governance Committee
James F. McCann			○
Alberto Dessy	●	●	
Ashley M. Hunter			●
Heather J. McGregor	●		
Maria Pinelli	○		
Samantha F. Ravich		●	●
Gianmario Tondato Da Ruos		○	

● Committee Member ○ Committee Chair

3 Further details are included in the Sustainability Governance section of this report and may be found at https://ir.brightstarlottery.com/esg/Governance-Documents.

This table refers to data as of December 31st, 2025 (GRI 405-1)
For the current composition of the comittees, please refer to the relevant tab available at the following link: https://ir.brightstarlottery.com/esg/Committee-Composition/default.aspx" Brightstar Lottery - Investor Relations.

Sustainability Governance

GRI 2-9; GRI 2-13; GRI 2-14; GRI 3-3

Brightstar constantly evolves its approach to sustainable growth by integrating all facets of sustainability into business management. Sustainability governance plays a prominent role in the Company's overall strategy, with direct involvement from top management.

In 2025, the Company evolved its sustainability governance by redefining roles and responsibilities and streamlining processes. Operational teams were reorganized to be purpose-driven rather than topic-driven, resulting in a leaner structure that enhances performance and management.

The NCGC is responsible for overseeing the Company's strategy on sustainability and monitoring implementation of the Company's sustainability program. The NCGC exercises this oversight within a governance structure that also encompasses the Sustainability Steering Committee (SSC). In addition to its primary responsibility for oversight of financial reporting and related disclosures, the AC shares responsibilities with the NCGC over relevant aspects of the Company's climate-related obligations.

Led by the Senior Vice President of Branding, Communications and Sustainability, the SSC is supported by senior leaders and representatives from key functions. The SSC represents an integral part of Brightstar's sustainability governance by endorsing programs and initiatives that contribute to the Company's sustainability strategy.

The SSC was established to create a unified sustainability approach across all regions and businesses and is responsible for integrating climate-related matters into the Company's business strategy. The SSC cultivates a long-term vision and related objectives, and increases communication on sustainability by sharing best practices at global and local levels.

The SSC plays a crucial role in sustainability governance at Brightstar by monitoring the implementation of the Company's Sustainability Plan, including climate-related risks and opportunities management, and reviewing and approving key activities of the Company's Decarbonization Plan.

Since the transition to a pure-play lottery Company, Brightstar has reshaped the SSC composition to reflect the lottery-only perimeter, and to integrate the Italian SSC into a single Company-wide committee. This organizational restructuring has allowed Brightstar to significantly streamline sustainability governance.

The SSC is responsible for reviewing the Company's annual Sustainability Report prior to its publication. Three times a year, the chair of the SSC, supported by the Global Sustainability team, also aknowledged by the NCGC provides updates to the NCGC, which in turn, periodically updates the Board on the Company's sustainability initiatives.

The Global Sustainability team supports Brightstar's sustainability agenda by overseeing, coordinating, and proactively managing all related initiatives. This includes assessing and managing climate-related risks and opportunities, setting corporate targets, and monitoring progress against them.

The Global Sustainability team leads project planning for the Brightstar Sustainability Plan, including the coordination of sustainability operational teams, data collection, and reporting systems to fulfill criteria of ESG questionnaires. The Global Sustainability team also leads the development of a global community engagement strategy, the establishment of partnerships with non-profit associations, and the implementation of responsible gaming initiatives consistent with industry standards. At the operating level, teams with employees from several departments are responsible for analyzing sustainability initiatives and defining related action plans.



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Brightstar's commitment to sustainability represents the Company's objective to serve the global lottery market according to disciplined principles of ethics and integrity.

Brightstar developed and published a Global Sustainability Policy, which defines the governance framework for the Company's sustainability efforts and provides overarching guidance for sustainability across key areas of business activity. This includes service delivery, supplier engagement, employee interactions, and other industry-related activities. The Policy also references other policies that support and operationalize sustainable practices, including:

- Human Rights Policy
- Sustainable Procurement Policy
- Environmental Policy
- Product Responsibility Policy
- Charitable Giving and Community Engagement Policy
- Responsible Gaming Policy
- Responsible Marketing Policy

Since the transition to a pure-play lottery Company, Brightstar has reviewed and updated all referenced policies in order to meet the evolving context and anticipate likely business and regulatory changes.

Operating with Integrity

GRI 2-15; GRI 2-16; GRI 2-23; GRI 2-24; GRI 2-25; GRI 2-26; GRI 406-1; GRI 3-3

Brightstar Lottery is constantly working to be a better supplier, employer, and corporate citizen. Brightstar is committed to ensuring compliance with the laws of the jurisdictions in which it operates and adheres to a Code of Conduct that applies to all stakeholders involved in its corporate activities.

Brightstar adheres to responsible business practices as documented within its Code of Conduct, Supplier Code of Conduct, Human Rights Policy, and sustainability and business ethics disclosures. These documents are grounded in internationally recognized intergovernmental standards and frameworks. These frameworks ensure Brightstar's responsible business conduct is in line with standards of ethics, human rights, labor practices, and stakeholder protection.

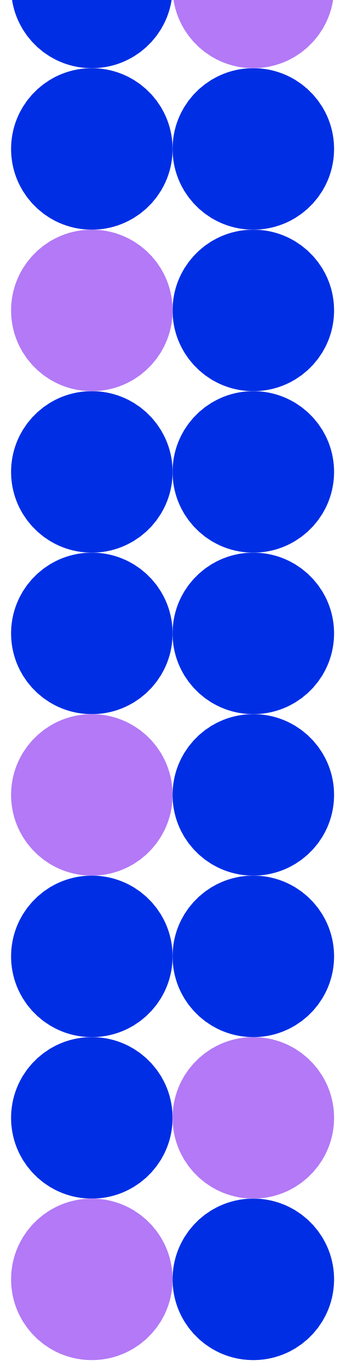
The Code of Conduct guides Brightstar's policies and procedures on anti-corruption and anti-money laundering (AML) practices, and on combating the financing of terrorism according to international and national laws and regulations.

Brightstar's Compliance department monitors a broad set of organizational risks — from anti-corruption, conflicts of interest, AML, and privacy, to jurisdictional licensing and due diligence — ensuring alignment with global best practices and regulatory expectations. Brightstar strives to remain a forward-thinking, accountable organization by embedding responsible gaming, compliance, excellence, and sustainability into every facet of its business.

At the operational level, Brightstar practices integrity through established procedures, controls, and recurring processes that guide daily activities and to address corruption in operations that are assessed to be high risk:

- Training and certification - All employees are required to annually acknowledge and certify their agreement to abide by the Code of Conduct, reinforcing awareness and accountability. Targeted training is provided in higher risk areas, which include anticorruption and AML.
- Reporting, investigations, and remediation - Operational procedures support confidential reporting through the Integrity Line, non-retaliation protections, standardized investigation protocols, and escalation mechanisms to senior management and the AC where appropriate.
- Risk-based controls and due diligence - Compliance and risk management procedures incorporate due diligence, monitoring, and controls proportionate to risk, including third-party screening and oversight within procurement and compliance programs.
- Cross functional coordination - Responsible business conduct is reinforced through structured interaction between Compliance, Legal, People & Culture (P&C), Procurement, and Internal Audit teams. Periodic compliance reporting, internal audit activities, and management reviews provide ongoing feedback loops and support continuous improvement.

In addition, Brightstar's Whistleblower Policy and Integrity Line make available secure, confidential, and non-retaliatory channels for reporting misconduct and other behaviors that may endanger the Company or its stakeholders.



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Compliance and Code of Conduct

Brightstar places significant emphasis on the importance of designing and implementing strong internal controls. Brightstar's Sarbanes-Oxley (SOX) compliance program assesses financial reporting risks and establishes adequate internal controls to address those risks. The effectiveness of internal control over financial reporting is assessed annually by Brightstar's CEO and CFO. Brightstar's independent registered public accounting firm, PricewaterhouseCoopers LLP, also audits the effectiveness of the Company's internal control over financial reporting annually.

The Board, supported by the AC, is responsible for overseeing Brightstar's responsible business conduct framework. The Board and AC review and approve the Code of Conduct on a periodic basis and receive updates on the Company's compliance with legal and regulatory requirements, ethics matters, whistleblowing reports and complaints, and risk-related matters. This ensures that responsible business conduct is present throughout the Company's governance, risk management, and internal control systems.

Senior management plays a key role in implementing Brightstar's policy commitments, based on their respective areas of expertise, including legal, people, and compliance. The Chief Compliance and Audit Officer (CCAO) manages the day-to-day operation of the compliance and ethics program and reports to the General Counsel, with direct access to the AC and Board as needed. This reporting structure supports independence and enables escalation of significant issues as they arise.

Brightstar's management team maintains a system of internal accounting controls, providing reasonable assurance that transactions are authorized and recorded accurately. Failure to do so would be considered a violation of several policies, including the Code of Conduct.

In Italy, Brightstar and its subsidiaries are subject to Legislative Decree no. 231/2001, which introduces the administrative liability of legal entities for a range of offenses committed by their directors, managers, employees, or third parties, provided the offenses are carried out in the interest or for the benefit of the Company. It also mandates the adoption of a compliance program aimed at preventing crimes, both white collar and otherwise.

Licensing Process and Regulatory Requirements

Brightstar's ability to hold multiple lottery licenses is a testament to its commitment to compliance and responsible operations. Obtaining and maintaining the necessary licenses requires strict adherence to regulatory requirements and rigorous background checks. Such licenses enable Brightstar to provide lottery customers with access to a diverse range of products and services across regions and jurisdictions. They also allow the Company to offer innovative solutions and cutting-edge technology to customers around the world.

Providing Clear Guidelines for Ethical Behavior

Brightstar's Code of Conduct, available in multiple languages, outlines the standards of behavior expected to ensure ethical and appropriate conduct when conducting business on behalf of the Company. The Code is accessible on Brightstar's website and addresses key risk areas, including anti-bribery, global trade compliance, fair competition, and environmental responsibility. It also provides practical examples to guide employees in maintaining integrity in their day-to-day activities.

All employees are required to read, understand, and comply with the Code of Conduct and must annually certify their adherence. To support this commitment, Brightstar delivers periodic training in multiple languages to reinforce employees' understanding of ethical and legal obligations. In 2025, 100% of employees completed the required training and certified their compliance with the Code of Conduct.

Brightstar's Internal Audit department also annually conducts an audit to assess compliance with the Code of Conduct certification process.

Additional Assurance on Internal Controls

In addition to participating in the SOX program, certain Brightstar operations are subject to System and Organization Control (SOC) audits, including SOC1 and SOC2. These audits provide additional assurance over the internal control environment. Operations can be subject to both SOC1 and SOC2 audits, depending on customer and/or contractual requirements.

A SOC1 audit focuses on Brightstar's business process and information technology controls that might impact a customer's financial reporting. Other service organizations that typically provide a SOC1 report to their customers include payroll processors, data centers or colocation service providers, and organizations that host software in the cloud.

A SOC2 audit is more operational and security-centric, focusing on how Brightstar achieves its service commitments or promises related to security, service availability, transaction processing, data confidentiality, and/or privacy.

Supporting Decisions in the Best Interest of the Company and its Shareholders

Brightstar's Conflict of Interest Policy defines and explains the process for reporting potential or actual conflicts of interest. The Policy also provides examples of situations that may create the appearance of a conflict and provides a process that employees must follow to seek review of an actual or potential conflict of interest[4].

Brightstar's Related Persons Transactions Policy is designed to mitigate the risk of a potential or actual conflict of interest, and support decision-making that is aligned with the best interests of the Company and its shareholders.

4 Conflict of Interest Policy is available to all employees in the Company intranet and on the Brightstar's website. There are no records of breaches Conflict of Interest Policy in 2025.

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Anti-Corruption and Ethics

Brightstar's Antitrust and Anti-Corruption Compliance and Ethics (ACE) policy and program, overseen by the Legal department, are fundamental to protecting the Company's reputation and retaining its licenses around the globe.

The ACE policy and programs include detailed gift, entertainment, and travel policies, along with specific procedures and limitations concerning government officials. Brightstar prohibits its directors, officers, employees, and third parties from offering, giving, soliciting, or accepting bribes, kickbacks, or any other improper benefit, whether in the public or private sector.

Business courtesies must be reasonable, for a legitimate business purpose, and must not present the appearance of impropriety. Brightstar developed an online reporting platform to provide a simple and time-efficient process for employees to obtain pre-approval for gifts or gratuities to a government official.

Compliance with the ACE policy is mandatory and may be a factor in promotion and compensation decisions. Non-compliance with the ACE policy may result in disciplinary actions, including termination of employment. Brightstar mandates annual anti-corruption trainings for all employees (including part-time), which includes confirmation from employees that they have received and reviewed the ACE policy.

Brightstar maintains a structured, enterprise-wide corruption risk assessment designed to comprehensively identify, assess, and mitigate bribery and corruption risks across its operations and business relationships.

The corruption risk assessment applies to all Brightstar operations and covers key corruption risk areas, including interactions with government officials, third-party relationships (such as agents, distributors, consultants, and suppliers), procurement and contracting activities, sales and marketing practices, charitable contributions and sponsorships, gifts, hospitality, travel and entertainment, facilitation payments, and mergers and acquisitions. The assessment considers country-specific risk factors, industry exposure, and the nature of services or products provided.

Given the transition resulting from the sale of the Gaming and Digital business in 2025, a risk assessment will be performed in 2026 to evaluate the anti-corruption program relevant to Brightstar's lottery operations.

Brightstar benchmarks its ACE program against the U.S. Department of Justice guidance and industry best practices. The Internal Audit department periodically performs audits on components of the ACE program and reports such results to the AC.

Brightstar's policy commitments specify that the Company conducts due diligence as part of its responsible business conduct framework to identify, prevent, mitigate, and address actual and potential adverse impacts related to human rights and responsible business conduct. These policies provide concrete examples of how due diligence is applied in practice, including risk-based due diligence processes within specific compliance domains. For example, the Global AML Policy explicitly requires customer and counterparty due diligence, enhanced due diligence where appropriate, and ongoing monitoring based on risk assessments.

Antitrust Policy

Brightstar is committed to complying with applicable antitrust and competition laws on the international, federal, state, and local levels. All directors, officers, employees, hired contractors, and agents must be aware of and comply with applicable antitrust laws.

Brightstar's Antitrust Policy covers dealings with competitors, distributors, customers, and suppliers, including bid rigging, price fixing, market division or customer allocation, industry associations and trade groups, joint ventures and collaborations, group boycotts, intellectual property, mergers and acquisitions, and human resources implications. Compliance with antitrust and competition laws are also addressed in Brightstar's Code of Conduct.

Whistleblower Policy

Brightstar and its employees have a duty to prevent and report any type of irregular activity, and fully cooperate with investigations of any attempted, suspected, potential, and/or actual violations of the Code of Conduct. Reportable misconduct as identified in Brightstar's Whistleblower Policy specifically includes any criminal activity such as bribery and corruption and any violation of Brightstar's ACE Policy.

Brightstar provides an Integrity Line (which covers the anti-corruption aspects comprehensively) to employees and external stakeholders (including agents and representatives of Brightstar, third-parties and members of the public) that features alternative methods for reporting irregularities, including a protected, anonymous online portal, phone number, and email address. As noted above, in 2025, 100% of employees received training on the Code of Conduct and the Human Rights Policy, both of which include a description of the Integrity Line as a reporting channel.

The Integrity Line is operated by an independent third-party provider, supporting legitimacy, confidentiality, and accessibility. Access is restricted to authorized personnel to protect the rights of and prevent retaliation towards the reporting party.

Brightstar will not retaliate, or permit retaliation, against anyone who reports suspected misconduct in good faith or cooperates with an investigation. All reports to the Integrity Line, compliance email, or phone line in 2025 were reviewed and investigated to determine whether the allegation was substantiated. None of the reports were considered material.

Critical issues raised, such as concerns regarding potential or actual negative impacts on stakeholders, are systematically escalated within the organization based on defined severity and risk criteria. Matters assessed as significant, including those involving legal, regulatory, ethical, human rights, or reputational risk, are promptly reported by management to the senior leadership team and the appropriate Board-level committee.

The AC receives updates on material grievances and trends through periodic compliance, ethics, and risk reporting. These updates include information on the nature of the issues raised, affected stakeholder groups, investigation status, remediation actions, and lessons learned. Where necessary, urgent or high-impact matters are escalated outside the regular reporting cycle to ensure timely oversight and decision-making. This process enables the Board to exercise effective oversight of stakeholder impacts, ensure accountability, and monitor the organization's response to significant risks and adverse impacts.

Grievances and reported irregularities are tracked and reported for resolution or closure by the Legal and Compliance departments. In 2025, Brightstar received 42 Integrity Line reports across several categories, including human resources, fraud, harassment, conflicts of interest, environmental health and safety, and data protection. Although none were classified as critical, each was reviewed and summarized for the AC.



A Company-Wide Responsibility

Employees are encouraged to report any suspicion of a violation of Brightstar's Code of Conduct or other activity that may be unlawful, lead to incorrect financial reporting, or raise questions about the integrity of management without any fear of retaliation. Employees, officers, directors, consultants, and representatives are encouraged to report suspected or known violations through channels like the Integrity Line, which can be done anonymously. The Code complies with EU Directive 2019/1937 of the European Parliament and of the Council of October 23, 2019 on the protection of persons who report breaches of Union law (EU Whistleblower Directive).

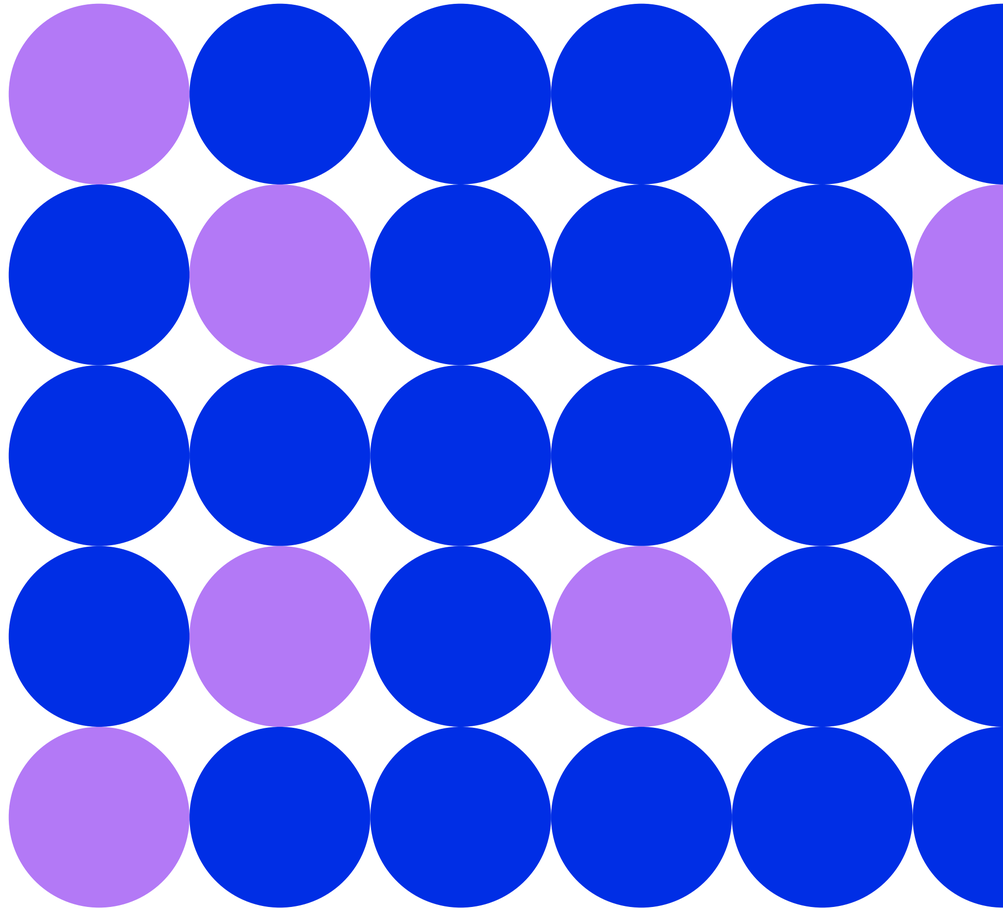
Brightstar's Legal and Compliance departments receive all inbound telephone and web portal reports of suspected or known violations through the Integrity Line, which is operated by an independent provider. If it is reasonable to conclude under the circumstances that a material violation is ongoing or about to occur, the CCAO and/or the General Counsel shall immediately notify the Chair of the Board's AC. In all other circumstances, investigation reports, findings, and recommendations will be reviewed in a timely manner by the CCAO and the General Counsel's office.

An Active Commitment to Legality

In Italy, Brightstar's compliance programs are operated according to Organizational Model 231 to prevent crimes identified by Legislative Decree no. 231/2001 (e.g. bribery, corruption, anti-money laundering, financial reporting crimes, unlawful competition, etc.). Organizational Model 231 includes:

- Performing a risk assessment, which covers anticorruption comprehensively, to identify the activities which may give rise to the offenses listed in the decree.
- Defining the procedures through which Brightstar makes and implements decisions about the offenses to be prevented.
- Defining procedures for managing financial resources to prevent offenses from being committed.
- Appointing a supervisory body to monitor the organizational model implementation through specific audits conducted by external audit firms.
- Implementing a disciplinary system that punishes failure to comply with the measures set forth in the model itself.
- Providing special channels to encourage reporting whistleblowing based on evidence of irregularities, violations, censurable behaviors, or any case of non-compliance with the Code of Conduct and/or Organizational Model 231.
- Implementing third-party due diligence, which covers anti-corruption comprehensively, to mitigate reputational risk and potential involvement in corruption and other illegal activities.
- Providing specific training to ensure adequate knowledge, understanding, and application of the Model by employees and managers.

There are also several certifications that ensure continuous improvement of the organization's processes and services to stakeholders. In Italy, Brightstar utilizes the Anti-Bribery Management System in line with ISO 37001:2016 and received the corresponding certification.



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Protecting People, Products, and Processes

GRI 2-25

Brightstar operates in multiple jurisdictions with strict regulations and diverse cultures. To meet the challenges of operating in such complex environments, the Company ensures internal policies and procedures are in place to protect against risks to the organization, including those related to personal data. The goal of adhering to these policies and procedures is to protect Brightstar's reputation among employees, customers, players, and retailers.

Enterprise Risk Management

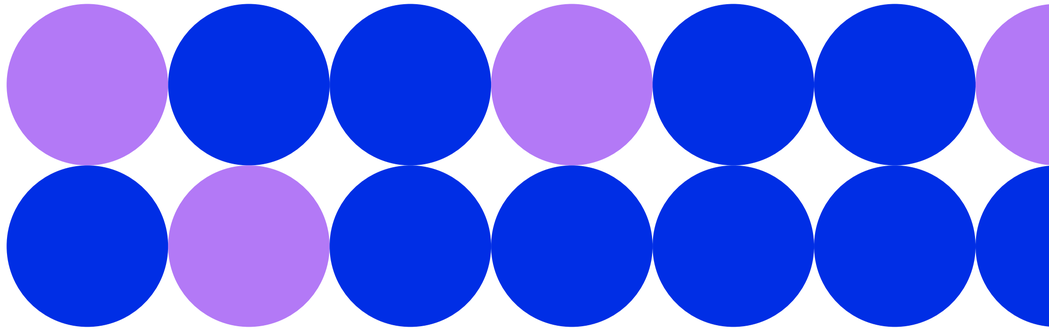
Brightstar seeks to monitor, control, and minimize the impact of risks to its business, and adopts an established Enterprise Risk Management (ERM) Program Guide which defines its ERM program overview, risk management approach, key components and processes, and risk governance. The Board, through its AC, provides direction and oversight over Brightstar's enterprise risks, ERM program, and risk management practices. The Company's ERM function defines and updates the ERM program in line with the AC's direction, following best practices and established methodologies. Brightstar's ERM program is comprised of various components, methods, techniques, and processes that facilitate the Company's identification, assessment, response strategy, management, monitoring, and reporting of material enterprise risks that pose the greatest threat to the Company's ability to achieve its strategic objectives.

The key components of the ERM program include:

- Risk identification and risk library. Corporate risk management maintains an enterprise risk register (or risk inventory) that captures the main strategic, operational, financial, regulatory, and technology risks facing the Company. This is refreshed periodically to ensure alignment with the Company's strategy, emerging trends, and the broader external context.
- Risk assessment for inherent and residual risks. Risks are assessed consistently across the enterprise by evaluating inherent risk (likelihood and impact before controls), control effectiveness (which are conducted via Risk Control Self Assessments), and residual risk (risk remaining after controls). This allows management to compare very different risks (e.g., regulatory, cyber, and talent risks) on a common basis and prioritize them.
- Risk response and treatment. For material risks, corporate risk management facilitates decisions on risk responses, such as mitigate (strengthen controls or processes), transfer (insurance, contractual mechanisms), accept (within risk appetite), or avoid (change strategy or exit activities). Where needed, formal action plans are defined, owned by the business, and tracked over time.
- Monitoring, reporting, and escalation. Corporate risk management ensures the ongoing monitoring of key risks and action plans (e.g., through tracking of Key Risk Indicators - KRIs), regular reporting to senior leadership and the Board/AC, and timely escalation when risk levels exceed the Company's defined appetite or tolerance thresholds. This includes quarterly enterprise risk reports which are presented to the AC.

The ERM program provides the Board and senior leadership team with actionable insights and intelligence to support decision-making. The ERM function continuously identifies emerging risks, defined as highly uncertain risks that are not currently impacting Brightstar, and maintains an emerging risk watch list. To identify potential emerging risks, the ERM function monitors multiple sources, including external risk research and advisory companies, and contributors from a variety of industries. It then reviews, evaluates, and determines which risks, if any, require further analysis, action, or escalation, or should be considered for inclusion in the Company's risk register.

All activities inherent to the Risk Management process contribute to support the development of risk awareness across the Company. Risk assessment activities serve to identify potential risks and to verify whether the existing control measures are adequate for mitigating those risks. Additionally, a process for assessing risks aims to identify potential risks and related controls before the launch of new initiatives or projects.



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Internal Controls and Risk Management System (ICRMS)

In Italy, Brightstar adheres to the ICRMS, an integrated framework with rules, processes, procedures, and organizational structures aimed at effectively identifying, measuring, managing, and monitoring the main risks that contribute to the sustainable success of the Company. According to the ICRMS, Risk Management is a second-level control function that manages:

- Risk Briefing: maintains and updates the Company's Risk Library. A Risk Assessment Plan is developed annually, based on the Company goals and emerging trends.
- Risk Assessment and Treatment: identifies and assesses the main risks and proposes, where necessary, a treatment plan through specific actions.
- Operational Incident Management: identifies, assesses, and treats incidents that have affected or may have affected process operations, information systems, security levels, or corporate reputation.
- Product or Process Innovation Risk Analysis: identifies risks and opportunities associated with the new initiatives.
- Monitoring and Information: ensures the effectiveness of the overall risk management process and the reliability of reporting to the Board.

Italian Operational Incident Management

The management activities of operational incidents ensure the identification, assessment, and treatment of incidents that had, or might have had, an impact on processes, IT systems, security levels, or corporate reputation. The goal of operational incident management is to restore normal operations, including planning appropriate corrective actions to prevent recurrence and documenting any economic losses.

Italian Third-Party Contractualization and Monitoring

Brightstar prioritizes compliance, reputational, bribery and sustainability risks, particularly those related to third parties, such as suppliers, retailers, and agents. The following risk assessment processes are applied:

- Risk assessment of prospective retailers.
- Risk assessment of suppliers, commercial partners, recipients of donations, and prospective agents.
- Management of alerts from external sources and accredited risk centers.

Such controls aim at assessing the reputation and integrity of legal entities and individuals who play a role in the organizations interested in working with the Company.

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Risk identification is an ongoing process to detect and document significant risks to which Brightstar may be exposed. The process is used to update Brightstar's risk register. The list of key risks is a subset of the overall risk register and is identified by the senior leadership team and ERM as risks that pose the greatest threat to Brightstar's strategic objectives.

The incorporation of risk criteria in the development of products and services follows an established process. Risk owners, following the initial validation of the concept of the product or process innovation by senior management, must engage the ERM function in a timely manner to enable an analysis of risks and opportunities associated with the initiative. This way, the ERM function can provide its feedback regarding risks that need to be considered or, where necessary, provides suggestions on additional controls to be implemented for their mitigation.

Risks in the risk register and their associated controls are assessed periodically through the Risk and Control Self-Assessment (RCSA) process, completed by risk owners and/or subject matter expert risk assessors. RCSAs are a standard risk management tool to systematically analyze, evaluate, and score risks and their associated control environments.

The Company-wide ERM function produces a quarterly Risk Assessment Report to inform the AC about key risks, effectiveness of risk controls in place, and emerging risks. Identified risks are then evaluated on the potential likelihood to impact the Company. Moreover, the ERM function conducts RCSA to assess effectiveness of the risk controls in place for key risks, identifying and assigning to the relevant risk owner actions to address any gaps identified through the assessment. The ERM function uses KRIs to assess the direction of the most relevant risks and deploy corrective actions where needed. Results of these efforts are reported to the AC and senior leadership team, providing assurance that Brightstar's material enterprise risks have been identified, assessed, understood, and appropriately managed.



A Company-wide Framework to Determine Risk Appetite and Report Risk Exposure

The Board, with the support from the AC, has approved a level of risk appetite for each of the five main risk categories (Strategic, Operational, Government/Regulatory/Legal, Technology/Information Security, and Financial) in which all risks identified in the Company-wide risk register are classified. This risk appetite governs the level of controls required to reduce the inherent risk to an acceptable level. The Company's risk profile and risk exposure are reviewed with the AC four times per year, and the residual risk level is calculated for risks that have previously had treatment plans identified.

Brightstar has implemented an ERM program that includes a structured approach to defining and assessing its risk appetite. Risk appetite is the organization's willingness to accept risk in the pursuit of its strategic objectives and is articulated through a set of Level 1 risk categories: Strategic, Operational, Financial, Government/Regulatory/Legal, and Technology and Information Security. Depending on the nature and context of each risk, the Company may adopt a stance that is Risk Cautious, Moderately Risk Cautious, Risk Tolerant, or Risk Seeking. This structured methodology is designed to align risk-taking with corporate values and long-term sustainability objectives.

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Two Examples of Company-specific Risk Exposure and Mitigating Actions

1 The risk of an external cyber-attack against IT infrastructure, systems, software, and security defenses (e.g., ransomware and malware, Distributed Denial-of-Service – DDoS – attacks) as well as third-party vendor systems, cannot be underestimated. Attacks can come from external parties with the intent to steal funds or hold the Company ransom, siphon confidential corporate information or trade secrets, or otherwise disrupt the business. This may involve collusion with a Brightstar employee and/or third-party vendor employee.

To strengthen the security of the B2B portal, multiple security measures are used to mitigate risk. Among the key initiatives is multi-factor authentication (MFA), with precautionary thresholds carefully configured for its activation. Specific rules have been implemented on the Web Application Firewall (WAF) to inspect traffic to and from web applications to monitor and detect/block malicious traffic, thereby protecting against attacks such as credential stuffing and brute-force attacks.

2 The risk of contract manufacturers and material suppliers failing to meet performance and quality standards and requirements set by Brightstar can lead to product defects or a general lack of quality, delayed shipments and deliveries to customers, and the need to spend time and resources to rectify.

A structured third-party management and oversight system has been implemented to ensure operational reliability, service continuity, and the protection of stakeholders. The control framework over third parties has been strengthened across the qualification, onboarding, and day-to-day operational management phases. Enhanced oversight for business-critical suppliers in the lottery sector (printers), requires a reinforcement of process review controls related to printing activities to detect potential errors, including manual ones. In 2025, Brightstar hired a Senior Director of Quality, who is responsible for strengthening the Company's internal formal quality program, along with several quality engineers that will develop more robust material specifications for selected, critical categories. Periodic audit activities are carried out on a sample of suppliers to verify compliance with contractually defined requirements and to address any identified areas for improvement.

The ERM function provides ongoing risk awareness training to business leaders, including risk owners and assessors, to ensure everyone understands their role in promoting risk management practices across the organization. Brightstar in Italy provides risk owners with ongoing training across risk management activities, including risk assessment interviews, incident management, and risk analyses on product and project innovations.

All employees are responsible for risk management and are expected to escalate any issues or concerns to the ERM function or through Brightstar's Integrity Line.

The ERM function actively collaborates with risk owners in various activities including identification and assessment of risks, incident management, risk identification, and control evaluation of new projects. In these areas, any added value inputs are analyzed and applied for improving risk management practices.

Risk Assessment activities are carried out using a bottom-up approach to gain in-depth knowledge of processes to identify potential risk events and to verify the effectiveness of associated controls by identifying specific mitigation plans shared with risk owners.

Internal Audit leverages risk management outputs to prioritize auditing high and critical risks. As Brightstar implements the new ERM process under its new leadership team, Internal Audit may plan to conduct periodic audits going forward.

In Italy, the risk management function is audited annually by external parties regarding the incident management process. Additionally, the risk management function is required to provide information on its activities to partners and customers every year.

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Accountability for Sustainability Risks

Organizations like Brightstar are expected to demonstrate accountability, transparency, and proactive management of sustainability-related issues by sharing insight into how their environmental footprint, business practices, and the well-being of employees, customers, and communities are being managed. At Brightstar, meeting these expectations means implementing practices such as emissions monitoring, reducing material consumption, and advancing responsible gaming initiatives, and promoting community engagement, regulatory compliance, and sustainable operations. Financial performance supports the Company's ability to pursue its sustainability objectives and stakeholder-related commitments.

In 2025, in line with evolving sustainability reporting practices, a financial materiality assessment was conducted on a voluntary basis using evolved legislative requirements and following the European Sustainability Reporting Standards (ESRS). This methodology evaluates sustainability topics from two complementary perspectives: the impact materiality, and the financial materiality assessment, which evaluated how sustainability-related risks and opportunities may affect the Company's financial performance or position.

The assessment evaluated the likelihood and magnitude of such effects, examining emerging risks and their potential financial relevance. Special attention was given to forward-looking issues such as environmental compliance, climate transition, and human rights, which may influence the Company's long-term financial standing. Many of these risks and opportunities stem from past events or anticipated future developments. These can influence the availability of key resources and shape relationships with stakeholders, ultimately impacting Brightstar's operations and reputation.

This comprehensive approach recognizes that impact and financial materiality are closely connected. Sustainability impacts, if unmanaged, can pose significant financial risk. Brightstar assessed the direct financial implications of its operations and how external sustainability trends and stakeholder expectations shaped its financial exposure.

The complete set of risks is described in the Financial Materiality paragraph of this report's Methodological Note (page 10).

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Climate-Related Risks

Since 2023, Brightstar has complied with the regulatory obligations set out in the UK Companies Act 2006 by including a "Climate-related financial disclosures" section within the non-financial and sustainability information statement in its UK Annual Report and Accounts (UK ARA).

The disclosures are organized around four thematic areas based on the Task Force on Climate-related Financial Disclosures (TCFD) Recommendations: governance, risk management, strategy, and metrics and targets. They address the Company's approach to corporate governance oversight of climate-related risks and opportunities, management of such risks and opportunities and their impact on the organization's strategy, and the metrics and targets used to assess and manage these risks. For further information, please refer to the 2025 UK ARA available on Brightstar's website.

Brightstar assessed climate-related risks and opportunities across three different time periods: short-term (2030), medium-term (2040), and long-term (2050). These periods are aligned with the broader climate-related initiatives adopted by Brightstar, such as the Science Based Targets initiative's (SBTi) emission reduction goals. This approach offered a comprehensive view of how climate-related risks and opportunities may affect the Company's operations, enabling a deeper understanding of the potential business impacts of climate change.

The tables presented hereafter shows the results of the assessments for the medium-term period, the most significant for Brightstar's business, as it aligns with the typical timeframe used for defining and implementing mid-term strategic and sustainability plans. The tables also outline the initiatives that Brightstar has identified to strengthen the resilience of its business model and strategy in response to the climate-related risks and opportunities identified.

Climate-Related Physical Risks

The assessment of climate-related physical risks is based on the Representative Concentration Pathways (RCPs) and Shared Socioeconomic Pathways (SSPs) climate scenarios derived from the Intergovernmental Panel on Climate Change (IPCC), which provides a forward-looking risks assessment through 2100 and covers almost all geographic areas.

The RCPs are a set of climate scenarios used to explore potential future trajectories of greenhouse gas (GHG) emissions and their impact on global climate change. They capture how emissions may evolve under different socioeconomic conditions, each corresponding to a specific concentration of GHG in the atmosphere. The SSPs complement the RCPs by describing alternative socioeconomic futures in the absence of climate policy measures. Together, these scenarios allow researchers to assess and study the potential consequences of varying emission levels and policy responses.

Brightstar assessed its exposure to physical risks on 13 strategic sites, including manufacturing facilities, warehouses, data centers, and office locations where significant research and development activities are carried out. These sites were selected based on their relevance to the business, determined by two key factors: the strategic importance of the sites, such as the revenues generated and the potential regulatory or operational consequences of business interruptions, and their climate impact and energy consumption profiles.

Brightstar assesses the materiality of physical climate-related risks using the ERM methodology, which is determined as an estimated financial impact if the risk event were to occur.

Climate-Related Physical Risks	
Heat waves and extreme temperature	Brightstar may face structural degradation and operational disruption due to prolonged exposure of its concrete buildings to elevated temperatures, which accelerate material fatigue and increase the likelihood of heat-induced damage. The financial exposure associated with physical asset impairment might be lower in an asset-leasing scenario than in a full-ownership scenario. However, the more significant impacts for the Company may arise from potential business interruptions and reduced operational continuity. Temperatures above 18°C (64.4° F) significantly raise cooling demand, leading to higher energy consumption and costs. All strategic sites may experience some level of exposure, but the facilities in Lakeland, Florida, U.S., West Greenwich, Rhode Island, U.S., and Rome, Italy are likely to experience the greatest financial impact due to their locations in areas more prone to heat waves and other climate-related hazards. The mitigation initiatives already implemented, along with those that may be evaluated, will help Brightstar reduce its dependence on non-renewable energy sources and energy consumption, as well as enhance building resilience to high temperatures.
Heavy snowfall	Heavy snowfall events, although generally expected to become less frequent in a warming climate, may still occur and create localized stress on buildings, roofs, and site infrastructure. They can cause short-term operational disruptions, particularly if access to facilities is temporarily limited. Brightstar's sites in West Greenwich, Rhode Island, U.S. and Lansing, Michigan, U.S. may experience some level of exposure due to their cold climates and recurrent heavy winter storms. The mitigation initiatives evaluated will help Brightstar enhance the protection of its assets and equipment.

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Climate-Related Transition Risks

Brightstar's 2025 assessment of its primary climate-related transition risks involved a multi-step approach including:

- A value chain analysis and review of prior disclosures on transition risks and opportunities to understand how climate change may affect the business model and operations.
- The use of climate-related scenarios developed by the International Energy Agency (IEA) and the IPCC to assess potential future vulnerability to climate change and to explore plausible transition pathways.
- A review of existing and emerging environmental regulations that may influence the Company's transition toward a low-carbon economy.
- Review and benchmarking of industry reports and peer activities to obtain insights into the competitive landscape and to enhance the understanding of potential challenges that may arise across the sector.

This approach provides an overview of the climate-related transition risks and opportunities associated with the Company's operations and supports the identification of potential impacts that climate change may have on the business as the economy progressively shifts toward lower-carbon models.

Climate-Related Transition Risks	
Compliance with climate-related regulations	The Company may face risk from the growing complexity and tightening of climate-related regulatory requirements across multiple jurisdictions. These rules impose extensive obligations relating to, amongst other things, emissions monitoring, sustainable product design, packaging reduction, supply chain due diligence, transparency, and climate risk disclosures. Non-compliance may lead to legal penalties, increased operational costs due to adjustments in printing processes and supply chain management, potential disruptions to international trade or access to markets, and reputational damage. Moreover, the multiplicity and divergence of standards across regions may require significant investments in data management systems, reporting capabilities, and broader sustainability initiatives to maintain compliance.
Investors' expectations on climate action	Investors are under increasing pressure from economic institutions, regulators, and legislative frameworks to demonstrate that their portfolios align with climate-transition pathways. Failure to pursue and publish credible emission-reduction targets, transition plans, or renewable-energy commitments may result in investors classifying the Company as at-risk from a climate perspective.
Customers' and public tenders' climate-related requirements	Regulators increasingly require companies to monitor and reduce emissions across their entire value chain, and these expectations are now embedded directly into public tenders and concession processes. State lottery operators - key business-to-business (B2B) clients - as well as private customers, face their own climate obligations and can include sustainability and climate-related criteria when awarding or renewing operating concessions, supplier contracts, and technology tenders. If the Company cannot demonstrate credible progress in emission-reduction, strong climate performance, or the development of low-carbon products, it may fail to meet tender and customer requirements, lose competitive advantage, or be replaced by competitors who are better aligned with climate-related expectations.
Energy supply costs and volatility	European climate policies including the EU Emissions Trading System expansion, carbon taxes, and renewable energy targets are driving the phase-out of fossil fuel power plants and accelerating renewable deployment. Short-term volatility may emerge during this transition, as current renewable technologies and available capacity cannot fully meet the Company's electricity demand. For a lottery company, printing facilities, digital servers, and retail network systems consume significant electricity. As fossil-based electricity becomes more expensive and renewable supply fluctuates, energy prices are expected to rise and become difficult to predict.

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Data Protection

Brightstar is committed to the protection and management of the personal data of its stakeholders, including customers, players, retailers, employees, vendors, and other business partners. Where Brightstar acts as a data controller and a data processor, all personal data are managed in compliance with applicable local privacy laws and regulations and Brightstar's Global Data Protection and Privacy Program (Privacy Program), which is designed to support individuals in exercising control over their personal data. All Brightstar entities and subsidiaries globally are expected to implement and follow Brightstar policies and procedures in compliance with data protection and privacy requirements applicable to business operations.

Brightstar is committed to protecting personal data and handling it responsibly, with accountability to everyone from whom the data was received. Brightstar provides multiple methods for individuals to easily request, rectify, delete, or otherwise exercise data access rights related to their personal data.

The Company is committed to ensuring that personal data maintained in its records are accurate, complete, and, where necessary, kept up to date. Appropriate and reasonable steps are taken to ensure that data held are complete and reliable for their intended purpose, and that any inaccurate or incomplete data are rectified or erased without undue delay, and where possible, data subjects should be given the opportunity to check and correct their personal data.

Personal data are collected and processed only for specified, explicit, and legitimate purposes and will not be further processed in a manner that is incompatible with those purposes. If personal data is to be used for a new purpose that is not compatible with the original purpose, the Company will assess the proposed use and, where required, obtain the data subject's consent in accordance with applicable laws and internal procedures, including consultation with the Privacy Office.

Along with the IT Corporate Solutions and Global Information Security Policy, the Brightstar Privacy Program underpins the organization's ability to be a steward of the personal data belonging to its customers, business partners, and employees. Brightstar is committed to the continuous improvement of its information security management system and to ongoing monitoring and response to information security threats. The Company recognizes that it must continuously evolve its Privacy Program to meet new regulatory requirements, case law, or the needs of its stakeholders.

Brightstar's data privacy governance model defines roles, responsibilities, and expectations across the Company. To strengthen the effectiveness of the Brightstar Privacy Program, the model delegates responsibilities to relevant business units and functions, giving them greater autonomy to implement the program and its principles in a manner tailored to their specific operations. The Brightstar Privacy Program is governed by:

- AC: Provides oversight of the overall effectiveness of the program and feedback to support continuous improvement.
- Program Owner: Brightstar's senior leadership is represented by the Executive Vice President and General Counsel, who sponsors, supports, and advocates for the data privacy program at the enterprise level.
- Senior Management: Implements and maintains data privacy and protection compliance within their respective business segments, consistent with the program's requirements and principles.
- Data Protection and Privacy Officers: Develop, manage, and maintain the Privacy Program, including defining standards, policies, and governance processes in collaboration with the legal department.
- Privacy Operations: Executes the operational components of the Privacy Program by partnering with business units to conduct ongoing risk and impact assessments, maintain data mapping, and support day-to-day compliance activities.



Data-Centric Approach in Italy

Brightstar in Italy is a data-centric organization that handles large-scale business-to-consumer (B2C) and B2B personal data for players, customers, employees, and retailers. Brightstar regularly updates its privacy policies and procedures including its Data Protection & Privacy Governance Model, Privacy by design and by default, and Data Breach Management, to better align with its evolving organizational structure and ensure compliance with the General Data Protection Regulation (GDPR) and other national and European data protection regulations. The existence of privacy procedures and updates to them allows for maintenance of the ISO 27701 privacy certification, awarded in July 2024 by the Det Norske Veritas, which assessed the Privacy model and procedures as fully compliant with the referenced ISO standard.

The Brightstar Privacy Program applies to all departments and all employees working for or on behalf of the Company. It also applies to personal data in Brightstar's possession, whether collected from employees, clients, customers, suppliers, vendors, contractors, subcontractors, shareholders, or any other third party. The principles underlying the Brightstar Privacy Program align with internationally recognized privacy standards, including ISO/IEC 29100, and are supported by adherence to multiple frameworks such as ISO 27701, the NIST Privacy Framework 1.1, and related information security standards, including ISO 27001. Brightstar's processes, governance, and stewardship are designed to address personal data throughout its lifecycle – from initial concept through final destruction or return.

These standards and frameworks are designed to ensure Brightstar's Privacy Program is built on an overarching set of principles, ensuring that data processing activities are:

- Fair and lawful
- For limited purposes and appropriate
- Adequate, relevant and not excessive
- Accurate
- Kept for no longer than is necessary
- Processed in a manner that ensures appropriate security of the personal data

The Brightstar Privacy Program is assessed using various targets and indicators that encompass both quantitative metrics and qualitative commentary, as each provides meaningful insight and is considered in the overall evaluation. Key Privacy Program components that involve monitoring and measurement may reflect operational, compliance, risk, and management perspectives. Metrics are designed to be specific, measurable, actionable, relevant, and time-bound and may include:

- Data Subject Access Requests/Consumer Access Rights Requests (DSARs): types, timing, and locations
- Risk Assessments: receipt (proactive), completion timing and reassessments for Privacy Impact Assessments (PIA), Data Protection Impact Assessment (DPIA), Legitimate Interest Assessments (LIA), and Transfer Impact Assessments (TIA)
- Artificial Intelligence (AI) assessments: quantity, timing, outcomes
- Records of Processing Activities (RPA) intake: quantity, timing, outcomes
- Incident response handling: timing, frequency, completion, remediations
- Data Privacy by Design: prevention versus response rates, personal data reduction, risk assessment inclusion
- Training: completion rates



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The Brightstar Privacy Program is regularly updated to address the evolution of the Company's business and technology, society, behavioral expectations, risk, and global legal frameworks. Both customer satisfaction and player satisfaction surveys are used to provide insight for the Privacy Program, while internal and external audits, along with related recommendations for improvement and findings, are indicators of areas for improvement. Periodic reviews of each privacy program component confirm that policies, procedures, business ownership, and overall processes remain aligned with current practices and expectations. In 2025, Brightstar continued to self-assess and reconsider processes, notices, and frameworks related to customer privacy and prioritized areas for improvement.

With increasing reliance on cloud-based services, Brightstar has identified specific risks associated with data governance in outsourced digital environments. One of the most significant concerns is the potential loss of control over data managed by cloud service providers, particularly when the geographic location of corporate and personal data is not clearly defined or disclosed. This loss of control may result in compliance challenges, especially for data protection regulations such as the GDPR, which imposes strict requirements on the transfer of personal data outside the European Economic Area. This could also lead to economic and reputational harm.

To mitigate these risks, Brightstar implements and enhances contractual safeguards, including specific provisions for relationships with cloud providers, data access rights, record retention, data destruction/return, and use of third-party processors. These measures are designed to reinforce accountability and maintain a high standard of data governance across all digital operations.

Brightstar monitors the global data privacy legal landscape to identify and prepare for new data privacy laws in jurisdictions where the Company operates. Brightstar has made appropriate adjustments to its GDPR-based processes to ensure compliance with new data privacy laws and regulations across the globe, including those enacted in the U.S.

The benefits of the Brightstar Privacy Program include:

- Innovation catalyst: the legal use of customer data is critical for the development of new products and services in the current digital environment. Brightstar is committed to ensuring the privacy and security of customers' personal data in the product development lifecycle.
- Market differentiator: by focusing on the next waves of business and regulatory opportunity based on personal data, the program may provide a competitive advantage.
- Meet customers' ever-increasing expectations: by focusing on increasing protection of customers' personal data, the program aims to strengthen Brightstar's reputation by fostering trust.

Brightstar educates employees on privacy trends and updates. Specifically for the privacy department staff, Brightstar provides access to data privacy news outlets and law and guidance platforms, with routine discussions about understanding and addressing new laws, concerns related to emerging incidents and threats, and new ideas and metrics.

Employees are expected to operate within the parameters of the Brightstar Global Data Protection and Privacy Policy. Brightstar provides training and guidelines for recognizing personal data, knowing how to submit a request for data access rights, and reporting a possible data incident. Personal data collection and Brightstar's use of sub-processors are addressed in all contracts and directly with the customer. Privacy notices are available online across all relevant channels and websites.

Brightstar will continue to embrace and incorporate evaluation of applicable laws and regulations against growing geographic customer, player, employee, and data locations, integrations, third-party involvement, use of AI, and new technologies.

Brightstar maintains a dedicated email address for data privacy inquiries from its employees, customers, vendors, and anyone else who may have a question or wish to exercise their rights. This email address is managed by the Privacy Office and is published in Brightstar's Global Data Protection and Privacy Policy, data privacy training materials, and privacy notices on every Brightstar's website that collects personal data. This email is monitored daily, and questions, comments, or inquiries are responded to as promptly as possible.

A tool is also available to submit, track, and respond to inquiries and claims from all categories of data subjects. The Global Data Protection and Privacy Policy is accessible online to all employees, and a data privacy request form is available to visitors at Brightstar's website. Brightstar's internal Privacy Policy for employees, which outlines their obligations to comply with the program, is available on the Company's intranet.

Brightstar takes technical and organizational security measures to help prevent unlawful or unauthorized data processing and the accidental loss of, or damage to, personal data. Such measures are set out in Brightstar's Information Security Management System (ISMS). Brightstar employees, contractors, and consultants are expected to familiarize themselves with the security measures set out in the ISMS policies and standards.

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Cybersecurity

Brightstar implements measures to protect its networks, devices, and data from unauthorized access or criminal use. The Company is subject to risks including external attempts to breach and compromise systems, insider threats, mishandling of security policies, and not adhering to published guidance on how to operate cybersecurity best practices.

Customers entrust Brightstar to safeguard their most valuable data. Brightstar's Global Cybersecurity (GCS) department teams are dedicated to supporting the Company in meeting its commitments to confidentiality, integrity, and availability of customer data. Internal security is held to the same standards as customer security. GCS supports operational efficiency through secure, paperless processes and facilitating secure remote work and assessment practices. Brightstar's robust GCS department governs information security concerns and is divided into practice areas including Cyber Governance, Cyber Threat Intelligence, and Cyber Operations. These teams are tasked with identifying risks, tracking mitigation activities, testing the operational effectiveness of controls, and monitoring the operation.

Brightstar's cyber event response plan includes escalation, investigation, containment, recovery, evidence preservation, and communication. These activities include communications with relevant third parties as required by applicable laws, regulations, and contractual obligations. The process is tested at least annually based on business, legal, and regulatory requirements. GCS also participates in Brightstar's vendor management program to assess the potential business impact of security threats posed by vendors and monitor the ongoing cybersecurity health of Brightstar's critical vendors.

In addition to internal management of data security controls, Brightstar undergoes several third-party assessments each year to assess the effectiveness of design and operation of controls. These independent assessments include SOC 1, SOC 2; Payment Card Industry (PCI) assessments; World Lottery Association (WLA) assessments; and ISO 27001 certification audits.

Cybersecurity practices are built into Brightstar's software development lifecycle. These practices include risk assessments of projects, rigorous testing of application and network changes, issue tracking to resolution, governance over the cyber environment, and providing a structured, measurable process to ensure solutions are developed with a security focus.

Information Security in Outsourced Data Processing

To ensure information security in outsourced data processing, Brightstar has implemented the following actions:

- Due Diligence in Selection Processes: as part of Brightstar's commitment to safeguarding sensitive information, enhanced due diligence procedures are applied during the selection of third parties that may access such data. These procedures include detailed information security questionnaires and the evaluation of relevant third-party certifications and assessments, such as PCI-DSS and ISO/IEC 27001. Failure to meet the required standards may influence the outcome of the selection process.
- Contractual Requirements and Ongoing Oversight: Brightstar's GCS team participates in the vendor management program by ensuring critical vendors adhere to the same rigorous standards applied internally. The security of sixth-party data processors is addressed through established third-party monitoring procedures, with restrictions on sixth-party involvement applied as needed.
- Monitoring and Review Mechanisms: Brightstar follows comprehensive procedures to ensure the ongoing adequacy of third-party data management security measures. These controls are subject to regular audits throughout the year, reinforcing the Company's commitment to maintaining high standards of data protection and operational resilience.

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Brightstar's global ISMS is responsible for addressing security concerns related to safeguarding customer data. The ISMS oversees the information security management framework and supports the development of related policies, standards, and procedures. ISMS's goals include:

- Complying with business, legal and regulatory requirements to maintain the confidentiality, integrity, and availability of Brightstar's information assets and services.
- Designing processes using industry best practices at all levels of support.
- Ensuring that Brightstar can continue its services in the event of major disruptions.
- Establishing controls for protecting Brightstar's information and information systems against theft, abuse, and other forms of harm and loss.
- Establishing requirements for controlling access to all Brightstar's information assets, including computers and communication systems.

Brightstar's ISMS follows a continuous improvement cycle of "plan, do, check, and act," that is integral to managing the Company's security program. This cycle includes formal reviews of detected weaknesses and subsequent remediation which may include updates to policies and procedures.

Brightstar's Cyber Threat Intelligence team works to ensure early detection of risks through a variety of testing methods implemented according to industry best practices. These tests typically involve penetration and vulnerability scanning of systems and environments and remediating the situation based on the results. Policies and standards are reviewed and approved on an annual basis by the Cybersecurity Governance Committee (CGC). These documents are central to Brightstar's ISO 27001 and WLA certifications, as they form the foundation of the Company's ISMS.

Security awareness and application training is offered to all employees, with specific modules tailored to their job functions. A global Cyber Security Incident Response Plan (CSIRP) is available to all employees for reporting potential incidents. Reports are reviewed by an incident manager, who assembles a dedicated team to assess the issue and respond accordingly. An internal report is then delivered to senior management, depending on the severity and nature of the incident.

Policies have been established to ensure the business impacts of disruptive events are understood, and that plans are in place to mitigate their potential effects. The plans are tested regularly to ensure the readiness to act.

WLA Information Security Certification

Brightstar[1] was awarded World Lottery Association's Security Control Standard (WLA SCS) Level 2 Dual certification, which combines the assessment of controls for lottery and mobile gaming solutions with information security management standards set by the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC).

The standard represented by ISO and IEC is often referred to as ISO/IEC 27001. It is awarded to organizations that adequately demonstrate security controls and instill confidence in interested parties that information is sufficiently protected.

These certifications cover more than 20 areas of the Company's business with auditors visiting Brightstar locations across 10 countries each year. Achieving this level of certification demonstrates the effectiveness of Brightstar's risk management strategies and processes. It also demonstrates to national and state regulators that the Company is committed to quantifiable security measures that comply with leading, independent, and industry-recognized accreditations.



WLA
WORLD LOTTERY ASSOCIATION

CERTIFICATE
OF CONFORMANCE
WLA Security Control Standard
Level 2

This is to certify that

Brightstar Lottery S.p.A.
Viale del Campo Boario, 56/D – 00154 Roma (RM), Italia
Via delle Monachelle, 84/G - 00040 Pomezia (RM), Italia

has met the criteria established by the

WLA Security Control Standard: 2020

and has been certified by the World Lottery Association*.

This certification stipulates that the requirements of ISO/IEC 27001 are met, together with the additional security requirements set forth by the WLA, including the Lottery and Gaming Specific Security and Integrity controls. These WLA security requirements are subject to the following scope:

Design and provision of services for the management of: Lotto and 10eLotto games, MillionDAY, games, fixed odds games and calculation and payment of prize money. Design, provision, commercialization traditional and instant (scratch and win) lotteries, and calculation and payment of prize money.

WLA-SCS certificate number: SCS2-LM3-0933
WLA-SCS initial certification: 2009-11-14
WLA-SCS latest revision: 2025-07-03
WLA-SCS expiry date: 2027-11-16
Assessment Service Entity: DNV Business Assurance Italy S.r.l.
Piazza dell'Indipendenza 23 B/C Copernico,Roma, Italy

Alessandro Paciucci
WLA SRMC Chair

Luca Esposito Poleo
WLA Executive Director

* The ongoing validity of this certificate is dependent upon the positive outcome of each mandatory annual audit.

1 Please find the complete list of the sites awarded with the certifications in the Appendix

Business Continuity

Brightstar recognizes that business continuity is critical to both internal operations and customer service. Brightstar's Business Recovery Plans are modeled after the ISO/IEC 27001 standard, which defines information security management and outlines Business Continuity Management (BCM) practices. ISO/IEC 27001 is an international standard developed jointly by the ISO and the IEC that establishes requirements for implementing, operating, monitoring, reviewing, maintaining, and improving an ISMS aligned with the organization's overall risk profile.

Brightstar has established policies to assess potential business impacts of disruptive events and ensure appropriate mitigation plans are in place. These plans are regularly tested to confirm readiness to respond to events that may impact Brightstar's systems. The Company also ensures that critical products, services, information, and information systems can be restored in a timely and secure manner following a significant disruptive event.

Brightstar's BCM system establishes processes to manage natural, human, and technological risks that could disrupt operations, while promoting recovery approaches that consider environmental impact and resource consumption. Like sustainability, business continuity focuses on ensuring that current and future processes continue to function with minimal impact and depletion of valuable resources.

Business continuity plans for both back office and production environments are centrally managed by infrastructure operational teams and use Brightstar's BCM Policy and BCM Standard practices for recovery.

A Specific Framework for Brightstar in Italy

Since December 2024, Brightstar's Business Continuity Framework in Italy, which includes the Disaster Recovery Plan, has been compliant with ISO 22301, the international standard for Business Continuity Management. The certification confirms the implementation of effective backup systems and processes to protect against theft, natural disasters, epidemics, terrorist attacks and other extraordinary events.

Aligned with the international standards, Brightstar pursues the following specific objectives:

- Define a Business Continuity Plan (BCP) that incorporates provisions and response activities tailored to the different scenarios identified.
- Establish a BCM organizational model with skills and powers to meet established.
- Define general criteria for the timely and efficient resumption of critical processes, including the prioritization of recovery activities, staff deployment, and communication with institutional bodies.
- Develop BCM procedures for managing operations in crisis situations and ensure cross-functional coordination of the structures and resources involved.
- Align the BCP with the BCM frameworks of critical suppliers and outsourcers to ensure consistent internal and external crisis response.

Brightstar in Italy has also incorporated climate-related risks, including rising average temperatures, increased frequency and intensity of extreme weather events, and sea level changes, into its BCM framework. To support this effort, the Company has begun integrating the BCM system with the following initiatives:

- Assessment of vulnerabilities affecting critical sites and processes under expected climate scenarios, with particular focus on Information Communication Technology (ICT) infrastructure and data centers.
- Integration of climate scenarios into Business Impact Analyses (BIAs) and Risk Assessments, identifying the most exposed processes and resources and the possible effects on the Company's value chain.
- Definition of specific response, prevention and mitigation plans for extreme climate events, including evacuation procedures, alternative supply arrangements and effective stakeholder communication strategies.
- Implementation of training and awareness programs for employees to raise awareness of climate-related risks and response measures.
- Collaboration with local authorities, civil protection agencies, and community stakeholders to enhance risk management efforts and enable rapid mobilization of resources in a crisis scenario.

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Anti-Fraud and Anti-Money Laundering

Fraudulent behavior can be defined as actions against corporate procedures or contractual, licensing, or law provisions taken by an internal or external entity to gain an economic advantage for itself or third parties with or without an economic or reputational impact on the Company.

Cashless fraud monitoring focuses on several areas of support, including Know Your Customer (KYC) verification checks, manual customer due diligence checks, monitoring payment registration and funds withdrawal, preventative and detective controls that limit deposits, identification of associated accounts, alerts on suspicious behavior patterns, and chargeback monitoring to prevent abuse of the chargeback process. KYC checks, which include the Office of Foreign Assets Control (OFAC) and Political Exposed Persons (PEPs) checks, are performed through integrations with several third-party vendors. These checks work to ensure compliance with age, location, and identity requirements, and to limit the opportunities for money laundering. Along with Brightstar's account management systems, customer due diligence checks are performed to ensure effectiveness of account restrictions and identification of abusive behavior that violates those restrictions.

Brightstar in Italy, in line with the guiding principles defined in the internal regulations relating to the ICRMS, has implemented a fraud governance model with a clear distinction of tasks between the first and second level of control.

The fraud management process is divided into Monitoring and Detection, Analysis and Investigation, and Post Investigation phases. The assessment stage is managed by Risk Management. At each stage of the process, all corporate functions collaborate within their respective areas of competence, primarily through designated focal points within the Level I control functions. These functions:

- Are responsible for the activities falling within their scope of competence in the fraud management process.
- Provide support to the Level II Control functions.
- Participate, where appropriate, in the decision-making process and receive the related information flows.



The second level of control is performed by Compliance and Risk Management. Risk Management is responsible for the identification and measurement of risk events, or Risk Assessments, for the qualification of an incident as "fraud," for the registration of fraud incidents within the Loss Data Collection, and evaluation and monitoring of the related corrective actions.

Fraud Management is responsible for:

- Providing periodic updates to the library of fraud schemes, as part of the Risk Assessment effort.
- Carrying out monitoring activities on second-level operational Key Risk Indicators (KRIs) in relation to fraud.
- Carrying out on-field monitoring activities by overseeing the network of authorized dealers.
- Performing investigations.
- Managing the treatment phase.
- Reporting to the governance and control bodies
- Monitoring account openings, logins, transactions, and gameplay behavior to identify anomalies and fraud risks.
- Overseeing financial flows and payment methods, including dispute management.
- Preventing abuse and improper use of gaming systems, including player accounts, promotions and bonuses, through alert handling and the adoption of corrective measures to protect players and ensure system integrity.

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Site controls in place ensure the safest possible gaming experience, both for the online sector and the retail segment. The Company implemented the following control measures:

- Facilitate payment-method verification through configurable controls.
- Provide restriction models to limit, control, and decline transactions based on defined rules and parameters.
- Support reporting of Key Performance Indicator (KPI) trend monitoring and fraud investigations.
- Support chargeback monitoring and dispute resolution.
- Alert system to detect any prize claims submitted under the names of Brightstar employees or credited to their bank accounts.

Brightstar recognizes the importance of preventing money laundering and terrorism financing and is committed to complying with applicable anti-money laundering (AML) and counter terrorism financing (CTF) laws and regulations. To meet applicable requirements, guidelines, and best practices, and to mitigate potential non-compliance, regulatory, and reputational risks associated with violations of applicable AML/CTF laws and regulations, Brightstar adheres to its Global AML Policy, also referenced in the Code of Conduct.

Brightstar and its subsidiaries also implement local policies and procedures, where required, designed to comply with the Global AML Policy and applicable local laws and regulations in the jurisdictions where they operate. Brightstar has processes and controls in place to monitor and mitigate risks of money laundering, monitor customer activity, and report suspicious activity. Brightstar employees who are in roles where money laundering has been identified as a risk are required to understand the relevant issues and report any suspicious activity. These controls proved effective, as in 2025 Brightstar identified no anti-money laundering anomalies requiring reporting to the Italian Financial Intelligence Unit (UIF) of the Bank of Italy.

Brightstar may provide account-based wagering services that could include management of payment providers/vendors, funds management, OFAC and PEP checks, monitoring of duplicate accounts, payment method verification, withdrawal monitoring, pay alerts, and fraud and suspicious activity detection and monitoring. Where these services are provided by Brightstar in a particular jurisdiction, the operations are required to strictly follow Brightstar's AML policy and adhere to any other customer requirements related to AML.

Brightstar's sanctions matrix is a strategic initiative launched in July 2025 to strengthen a fair, consistent, and transparent approach to the management of anomalies and non-compliance. The tool integrates with existing corporate systems, including the Fraud Risk software platform, which manages KRIs, and ServiceNow, which enables end-to-end traceability and more efficient case management. Adoption of the matrix supports more responsible governance by reducing discretion, ensuring consistent treatment of stakeholders, and reinforcing the robustness of the control framework. The matrix went live in early 2026.



AML Measures Implemented in Italy for MyLotteries

MyLotteries, as a provider of online gaming services subject to AML regulations, has implemented an AML system in accordance with Italian Legislative Decree No. 231/2007.

A Senior Director of Compliance & Quality has been appointed to lead the AML Function Money Laundering Reporting Officer (MLRO) and hold the following responsibilities:

- Develop and implement AML policies and procedures.
- Oversee the entire AML function and ensure the organization's compliance with AML regulations.
- Identify, assess, and mitigate money laundering risks related to the Company's activities.

The Financial Security and Due Diligence Manager, reporting to the MLRO, is the Suspicious Transaction Reporting Officer with the following responsibilities:

- Alerts Evaluation: Analyze alerts received from monitoring systems to determine whether there is sufficient reason to suspect money laundering activities by customers.
- Reporting to Authorities: Prepare and forward suspicious activity reports to, and collaborate with, the relevant regulatory authorities, such as the UIF in Italy.
- Policy Update: Develop and update AML policies and procedures based on new regulations and best practices.

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Product Responsibility

Brightstar is committed to designing and delivering products that reduce potential risks to customers, employees, end users, and the environment. The Company complies with applicable regulatory frameworks and industry standards, while promoting product safety, game integrity, and responsible innovation. Brightstar is committed to continuously improving customer satisfaction by monitoring product performance, addressing feedback, and ensuring that products and services meet defined requirements and expectations.

Brightstar's Product Responsibility Policy is designed to support the Company's sustainability strategy, with particular focus on the responsible gaming and climate action, biodiversity, and circularity spheres of impact. This policy applies to all Brightstar products, including retail solutions, digital solutions, and printing operations, and reflects the principles of relevant international treaties and established standards.

Brightstar implements the Product Responsibility Policy through procedures and operational controls integrated into product lifecycles. Effectiveness is monitored through periodic reviews and internal controls to support ongoing compliance. Brightstar also maintains a structured supplier-quality management process that includes qualifications, periodic evaluation, and monitoring of suppliers' performance to ensure consistent quality and regulatory compliance. This process is reviewed periodically to support alignment with evolving regulatory frameworks, technological innovation, and stakeholder expectations.

Brightstar adopts policies and procedures to ensure safety for employees and end users. Brightstar prioritizes player protection by embedding responsible gaming safeguards into product design and operational practices. Through ethical marketing, global best practices, and collaborative efforts with responsible gaming experts, the Company helps prevent problem gambling and supports vulnerable individuals as described in the section dedicated to responsible gaming within this report.

Brightstar's product responsibility initiatives support three UN SDGs:



Good Health and Well-Being

Ensure healthy lives and promote well-being for all, at all ages.



Responsible Consumption and Production

Ensure sustainable consumption and production patterns.



Climate Action

Take urgent action to combat climate change and its impacts.

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Brightstar is committed to safeguarding customers by integrating health, safety, and environmental considerations into the design, manufacturing, deployment, and operation of its products. Brightstar seeks to prevent harm, reduce exposure to hazards, and promote safe use throughout product lifecycles.

The Company's approach to product design incorporates the latest research and aligns with internationally recognized benchmarks. Product safety expectations are embedded within quality management systems and product development processes, including design controls, verification and validation activities, and conformity with relevant regulatory and industry standards. Where required, products are evaluated by independent safety certification bodies to confirm compliance. These commitments apply across hardware, consumables, and supporting systems. Hardware products are designed and tested against applicable electrical, mechanical, and fire safety standards.

Manufacturing and service locations apply hazard-identification and risk-reduction practices designed to prevent injury, reduce exposure to hazardous materials, and support safe handling and operation. For consumables, production processes are designed to minimize health and environmental impacts through the exclusive use of water-based, non-toxic inks and coatings, controlled material handling, and emissions management aligned with applicable permits and regulations, as highlighted in Brightstar's Environmental Compliance Policy, that defines processes to ensure that all products comply with applicable environmental requirements across their lifecycle. Further details on the policy implementation and its link to climate-related objectives are provided in this report's Climate Action, Biodiversity, and Circularity section.

For hardware products, customer health and safety considerations are addressed through defined operating, maintenance, and field service requirements that support safe use throughout the product lifecycle.

Product and process risks are addressed through enterprise-level quality, safety, and compliance frameworks, supported by site-level environmental, health and safety management practices, and product qualification controls. These mechanisms support compliance and facilitate continuous improvement through corrective actions, performance monitoring, and management review.

The installation of lottery equipment is dependent upon delivering designs that comply with applicable safety standards across various regulations. All Brightstar devices are designed to meet those rigorous standards. Manufacturing and assembly processes include controls to eliminate sharp edges, reduce pinch points, and ensure safe handling, supported by inspection and testing activities that verify conformance to approved specifications.

Product safety goals are centered to support that products meet applicable safety, quality, and reliability requirements prior to deployment and throughout their use. Performance indicators include product non-conformance trends, safety-related defects identified during testing or operation, customer feedback, and results of verification and validation activities. For hardware products, additional indicators include successful completion of required safety certifications and adherence to applicable standards. Product safety performance and lessons learned are reviewed as part of quality KPI reviews and product lifecycle governance processes.

At manufacturing and service locations, environmental, health, and safety (EHS) activities are managed through site-level systems that support the identification, prioritization, and timely closure of safety-related measures. Performance is monitored through key indicators, including recordable incidents, near-miss events, corrective and preventive action closure rates, and adherence to permits and regulatory requirements.

Waste disposal is handled in line with applicable regulations, contractual obligations, and internal environmental controls. Dedicated procedures further ensure the secure management of products, materials, and components, including their destruction, recycling, or recovery, as appropriate. In particular, the Lakeland, Florida, U.S. and Tito Scalo, Italy printing facilities reported no incidents of non-compliance in 2025 related to the health and safety impacts of products and services.



Managin Product Compliance with EU Directives

To address health and environmental impacts, Brightstar requires all direct material suppliers to comply with the EU directive restricting certain hazardous substances in electrical and electronic equipment (2015/863/EU) (RoHS 3).

All product designs comply with restrictions on hazardous substances standards, underscoring the Company's dedication to environmental and regulatory compliance. All product designs also comply with Regulation (EU) 2019/1021 on persistent organic pollutants, also known as POP, and with Regulation (EC) No 1907/2006 on the registration, evaluation and authorization of chemicals, also known as REACH.

Brightstar also considers and respects Directive 2012/19/EU on waste electrical and electronic equipment, also known as the WEEE recycling initiative.

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Maintaining game integrity is of paramount importance. Brightstar's instant tickets incorporate unique coatings that create an envelope around play areas to protect against manipulation, including changes to win-or-loss statuses. Ticket security is repeatedly evaluated during the printing process to eliminate concerns once tickets are sold. Brightstar also implements activation processes that ensure tickets become active only upon retailer activation, preventing theft or unauthorized sale prior to activation. Security features are evaluated by independent labs to verify effectiveness.

Game data integrity is protected through the Company's patented NextGen platform, which integrates advanced digital security and an immutable forensic blockchain. This system ensures traceability and prevents unauthorized access throughout the game development lifecycle. Brightstar's NextGen system harnesses modern digital security technology by maintaining an unalterable forensic blockchain of an instant game to help prevent security breaches. A blockchain is associated with each instant game's unique database and protects the entire game's development and reconstruction process.

Brightstar's instant tickets are also designed to protect customers and players against material faults, health, and fraud risks. Tickets are built to perform under extreme conditions, maintaining scratchability and integrity even after prolonged storage or exposure to humidity and cold. Brightstar's tickets and paper products are non-toxic and do not exhibit a physical hazard or health risk per OSHA standard 1910.1200©(iii).

Brightstar is committed to ensuring confidentiality, integrity, and availability of information by protecting networks, devices, and data from unauthorized access or criminal use. Brightstar holds WLA's Security Control Standard: 2020 (WLA SCS 2020) Level 2 Dual certification, which combines the assessment of controls for lottery and mobile gaming solutions with information security management standards from the ISO and the IEC.

Brightstar's elnstant game files are secured on the Company's remote game server, to help protect against unauthorized tampering Brightstar's outcome determination engine (ODE) is designed to support fairness, security, and transparency in all lottery-related operations. Controls and processes governing grids, odds, pools, and randomness management within the ODE are defined by policy.

Brightstar has established controls to ensure that product labeling and marketing content are accurate, compliant with applicable regulations, and aligned with both customer specifications and jurisdictional requirements. All significant product and service categories (100%) within Brightstar are covered and subject to compliance assessments against defined labelling procedures. Compliance is verified through structured quality, regulatory, and customer approval controls applicable to each product category.

All product and service information, including labeling, is developed in accordance with customer-approved specifications and applicable jurisdictional requirements. This includes artwork, instructions, responsible gaming messages, and regulatory disclosures. Brightstar reproduces only approved content and does not introduce unauthorized changes to labeling or other customer-facing materials. For electronic equipment, relevant conformity requirements, such as CE marking or equivalent regional standards, are applied.

To support accuracy and consistency, Brightstar implements controlled version management, formal approval workflows, and final verification processes, supporting the correct reproduction of all required content elements.

Performance indicators include the number of labeling or artwork non-conformances, deviations identified during production or verification activities, and incidents of non-compliance with regulatory or customer requirements. Targets are set to achieve and maintain full compliance, with performance monitored through quality control checks, audit activities, and management reviews. Across these areas, performance data and trends are reviewed through established governance and management review processes. Insights from these reviews are used to inform corrective actions, process improvements, and training updates, supporting Brightstar's commitment to responsible product stewardship and continuous improvement.

Information relating to the sourcing of components is managed through formal internal procurement, sustainability, quality, and compliance processes. Brightstar is committed to a risk-based supplier qualification framework, which includes due diligence, adherence to the Company's Supplier Code of Conduct, and evaluation against environmental, social, and quality criteria. Where applicable, sourcing requirements—such as the use of certified or otherwise approved materials (e.g., responsibly sourced paper or compliant inks)—are embedded into supplier contracts and verified through documentation reviews, certifications, and periodic supplier assessments.

Supplier performance is monitored on an ongoing basis through cross-functional oversight, including procurement, quality assurance, and sustainability teams, with corrective actions implemented where necessary. For select materials, traceability mechanisms and chain-of-custody documentation are maintained to ensure compliance with certification and regulatory requirements.

During the reporting period, Brightstar conducted supplier qualification and compliance reviews across its supply base and did not identify any incidents of non-compliance with applicable regulations or voluntary codes related to marketing communications, product and service information, or labeling.

Brightstar continues to strengthen its responsible sourcing and transparency practices, including expanding the use of certified materials and enhancing supplier monitoring processes.

Extensive Employee Training on Product Quality

Brightstar provides product quality training to employees based on role, responsibility, and product category. Initial quality training is delivered as part of onboarding for relevant roles and is supplemented by role-specific and functional training covering applicable quality requirements, processes, and controls.

Product quality training is developed and delivered by quality and operational departments and applies to employees involved in product design, manufacturing, testing, deployment, servicing, and support. Training content addresses key quality and product-safety requirements relevant to each product category, including hardware, consumables, and supporting systems.

Refresher training, targeted updates, or additional instruction are provided as needed in response to changes in processes, products, regulations, standards, or identified quality issues. Training effectiveness and coverage are supported through quality management systems, documented procedures, and management review processes to promote consistent product quality and continuous improvement.

Any individual who becomes aware of perceived violations of the Product Responsibility Policy, including employees, agents, representatives, third parties, or members of the public, may immediately and anonymously (if desired) report the alleged incident to any member of Brightstar's management team, the Company's People and Culture (P&C) department, or through the Integrity Line, which is managed and operated by an independent third party.

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Sustainable Growth



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Sustainable Growth

Sustainability is a core pillar of global business strategy, and Brightstar Lottery has paved the way by incorporating sustainability across its entire business and striving to meet and exceed evolving sustainability standards and best practices globally.

Corporate Values and the 2030 Agenda

GRI 2-22; GRI 2-28

Nearly 20 years ago, Brightstar became one of the first in the industry to voluntarily report on its sustainability progress. Over the years, as sustainability has become increasingly prominent in business, Brightstar has continued to fine-tune internal processes and outward initiatives to meet the evolving requirements from different stakeholders.

Brightstar's internal culture is guided by corporate values that reflect the Company's commitment to sustainability and its stakeholders:

- We do the right thing: We act with ethics and integrity. We promote responsible gaming and prioritize sustainability.
- We strive for excellence: We take initiative. We are accountable and responsive. We drive innovation for the future of the lottery industry.
- We are one team: We respect each other, collaborate, and create inclusive teams. We come together across our business to fuel customer growth.



Brightstar strives to be a responsible partner for local and global authorities, customers, and players in the jurisdictions where it operates. Embracing the 2030 United Nations (UN) Agenda for Sustainable Development and specific UN Sustainable Development Goals (SDGs) is integral in identifying Brightstar's sustainability priorities.

The 2030 Agenda and its 17 SDGs form an action program to benefit people and the planet. Brightstar adopts seven SDGs: good health and well-being (SDG 3), quality education (SDG 4), affordable and clean energy (SDG 7), decent work and economic growth (SDG 8), reduced inequalities (SDG 10), responsible consumption and production (SDG 12), and climate action (SDG 13).



Brightstar is a member of the United Nations Global Compact (UNGC), the largest corporate sustainability initiative in the world for the development, implementation, and disclosure of responsible corporate policies and practices. Brightstar is committed to incorporating the 10 UNGC principles related to human rights, labor, the environment, and anti-corruption into the Company's strategy, culture, and day-to-day operations.

Along with the natural evolution of Brightstar's sustainability strategy, the Company continues to identify new and more ambitious priorities to meet the ever-changing sustainability landscape.

In 2025, Brightstar introduced its evolved sustainability strategy, guided by three strategic elements:

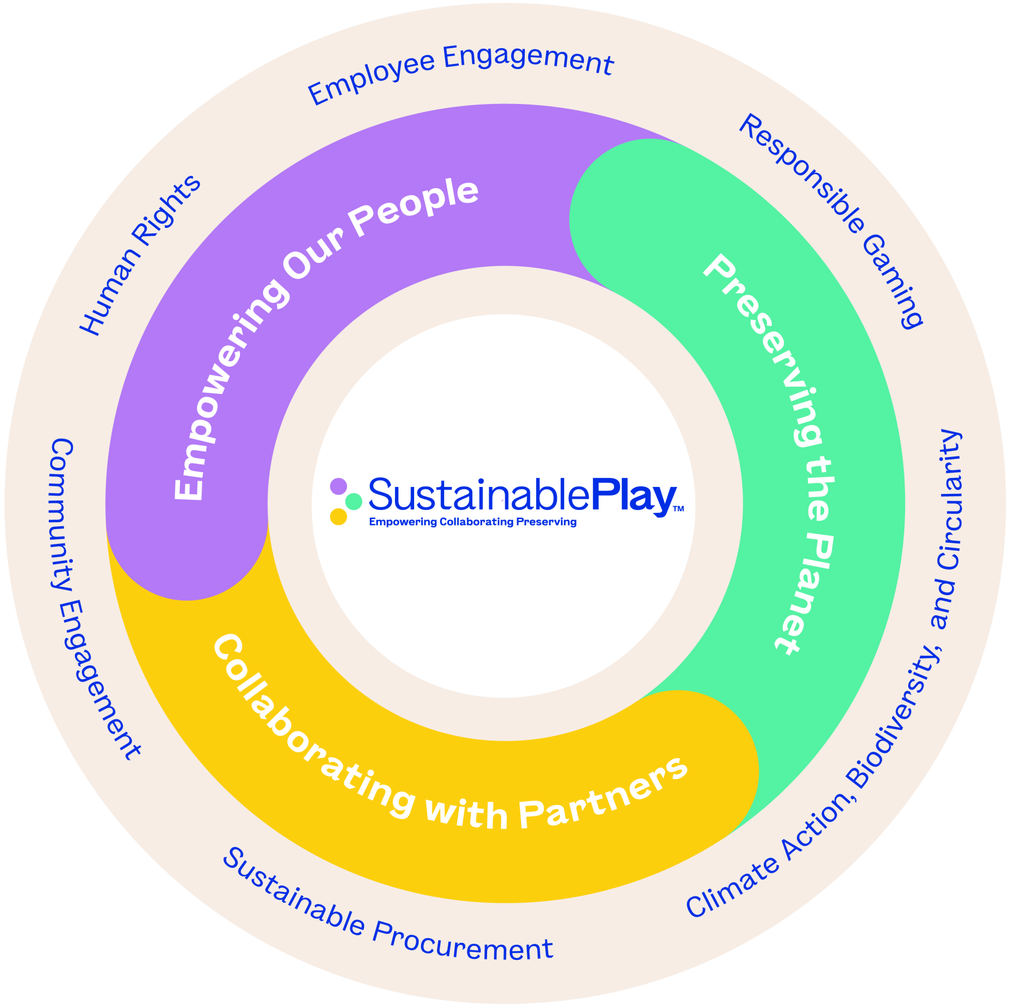
- Empowering Our People: To do the right thing and strive for excellence. Brightstar fosters a culture that values individuals. It recognizes the unique contributions and perspectives of every person and works to attract and retain the talents of tomorrow. Brightstar believes that when people thrive, innovation follows – and so does progress.
- Collaborating with Partners: To build value together with customers, communities, and society. Brightstar maintains relationships that are trustworthy, ethical, and mutually beneficial. From suppliers and business partners to the communities it serves, Brightstar believes in growing together responsibly and transparently. Brightstar is also committed to contributing to a secure and positive gaming environment, where integrity is the foundation of every interaction.
- Preserving the Planet: To safeguard the environment and its resources. Brightstar acts to protect the climate, preserve natural resources, and advance circularity. The Company's responsibility to the planet is clear – and so is the path forward.

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These elements are brought to life through six spheres of impact – focused actions that ignite change at Brightstar. Together, these form a precise, purposeful, and powerful system of action. These impacts include:

- Employee Engagement: Brightstar fosters a positive work environment by promoting welfare and wellbeing, as well as enhancing skills through training and development.
- Human Rights: Brightstar advocates for human and labor rights, prioritizing employee health and safety, the protection of the most vulnerable groups and promoting inclusivity throughout its operations and value chain.
- Responsible Gaming: Brightstar contributes to player protection by promoting positive play, raising awareness of responsible gaming tools, and securing third-party credibility through accreditation and research.
- Community Engagement: Brightstar engages communities by collaborating with organizations and supporting programs that foster skill development.
- Sustainable Procurement: Brightstar enhances sustainable procurement by selecting responsible suppliers who prioritize environmental stewardship and ethical labor practices.
- Climate Action, Biodiversity, and Circularity: Brightstar enhances energy efficiency and supports the transition to renewable energy, while investing in eco-design product strategies. Brightstar promotes biodiversity and circularity by selecting environmentally conscious materials and boosting recycling, reuse, and recovery practices.

In jurisdictions where Brightstar is the lottery operator, stakeholders include players, retailers, regulators, and communities. Aligned with Brightstar's global sustainability strategy, initiatives for these stakeholders include engaging directly with players and retailers to provide responsible gaming resources, partnering with gambling treatment providers, and mitigating environmental impacts of its business on local communities.



Stakeholder Engagement[1]

GRI 2-6, GRI 2-28; GRI 2-29

Nurturing a positive relationship with stakeholders is crucial to Brightstar's sustainability strategy. Throughout the years, Brightstar has fine-tuned its initiatives and projects to meet stakeholders' needs and expectations.



Community

Brightstar is committed to making a positive impact in the communities where it operates through dedicated corporate and employee-driven programs that enrich and strengthen such communities and support Brightstar's sustainability goals.

The Company partners with organizations that align with its chosen SDGs to provide employees with the opportunity to give back to their local communities. Brightstar also hosts community-focused initiatives including Earth Month, Global Giving Month, Literacy Awareness Month, and Season of Giving.

Its flagship community program, After School Advantage (ASA), funds digital learning centers in local communities to expand access to science, technology, engineering, arts and mathematics (STEAM) learning opportunities.

Customers and Players

Brightstar works closely with customers on player engagement and retention. Extensive research on new and existing products and solutions allows Brightstar and its customers to understand player behavior and aim to support positive player experiences in a safe and controlled environment.

Brightstar conducted over 300 market research projects across 665 cities in the U.S., and 179 markets internationally. Projects included game research, tracking studies, drivers and barriers of play studies, lottery retail studies, products and services evaluations, consumer and technology trend studies, and customer satisfaction studies involving customers, players, and retailers.

1 For further details of engagement activities carried out in 2025, please refer to the 2025 UK Annual Report and Accounts.

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Active Presence with Industry Associations

Brightstar actively engages with international industry associations through its memberships in both the European Lotteries (EL) and the World Lottery Association (WLA) as associate member, as well as regular member being the state licensee for the draw and instant lotteries in Italy. Since 2014, a representative of Brightstar Italy has been elected to the Executive Committee of the WLA, which promotes collaboration among gaming operators, carries out institutional activities, advances the allocation of financial resources to good causes, shares best practices, promotes technical excellence standards, and develops responsible gaming practices. As part of this role, Brightstar leads the development of Security and Risk Management Standards for relevant WLA certifications, with a Company representative serving as Chair of the relevant WLA Committee. Brightstar also contributes to WLA activities related to social responsibility and responsible gaming, with particular focus on communities and environmental protection.

Brightstar is also represented on the Executive Committee of EL, the association's main decision-making body responsible for coordinating institutional presence and positioning with the European Union. This work is supported by Communities of Experts, long-term, open forums bringing together Association members who share expertise or professional interest in a specific domain and multidisciplinary task forces established to deliver on clearly defined assignments with specific objectives. Since February 2026, three managers from Brightstar in Italy have held Vice-Chair positions across three Communities of Experts: Responsible Gaming & Sustainability, Marketing & Communication, and Security, Risk & IT. These appointments reflect EL's recognition of Brightstar's contribution and the expertise of its professionals in representing the Italian lottery industry.

Brightstar engages with customers and industry stakeholders through a range of events, including customer visits through tours of Brightstar's Player Experience Lab. In 2025, Brightstar strengthened its leadership and engagement within the global lottery community by participating in 20 association-hosted events. The Company's presence at key gatherings including the National Association of State and Provincial Lotteries (NASPL) annual conference, the EL Congress, and the XVIII Congreso de la Corporación Iberoamericana de Loterías y Apuestas de Estado (CIBELAE), reinforces its commitment to collaboration, innovation, and industry advancement.

Beyond the major trade shows, Brightstar participated in numerous association conferences and seminars worldwide, including the Asia Pacific Lottery Association (APLA) spring seminar and fall conference, the EL/WLA Sustainability and Responsible Gaming Seminar, the EL Security and Operational Risks Seminar, the NASPL Professional Development Seminar, the Public Gaming Research Institute (PGRI) Smart Tech Conference, and the CIBELAE Sustainability and Responsible Gaming Seminar. Through speaking engagements and panel participation, Brightstar helped foster dialogue on responsible gaming, operational excellence, and the evolving needs of lotteries and their players, highlighting the Company's dedication to supporting its partners and advancing a secure, responsible, and innovative lottery ecosystem.

In Italy, Brightstar is a member of the Associazione Gioco da Intrattenimento in Concessione (AGIC), an industry association of the confederal system of Confindustria. The Company continues to carry out a project launched in 2020 in collaboration with the SWG Research Institute, aimed at continuously monitoring the gaming market and player behavior. The initiative provides institutions with research and database support for the implementation of policies that promote responsible and informed use of public gaming products.

Brightstar also attends panel discussions with industry thought leaders including PGRI Retail Modernization, PGRI Digital Lottery, PGRI Lottery Expo, PGRI Women Initiative in Lottery Leadership, and La Fleurs. Global customer forums, in-venue product launch activations, innovation seminars, retail webinars, workshops, and trainings allow Brightstar to share leadership experiences, best practices, and other insights.

Brightstar leverages customer feedback from contact centers, satisfaction surveys, scorecards, trade marketing surveys, and in-person reviews to better understand the challenges and opportunities facing the lottery industry and evolving public policy issues. Brightstar also supports responsible gaming by collaborating with a variety of stakeholders, including gambling researchers like the International Center on Responsible Gaming (ICRG) and policy makers. These ongoing conversations help Brightstar understand and address customers' and players' evolving needs.

Employees

Employees are key contributors to business success, and Brightstar promotes their wellbeing while listening to, respecting, and valuing their ideas, suggestions, and expectations to more effectively deal with the challenges posed in today's market. As such, Brightstar has evolved its inclusion efforts by putting greater emphasis on creating an environment of belonging, where everyone can be heard, seen, and valued for their contributions. Recognizing that an employee's identity shapes their conduct at work, the Company continuously strives to create a culture of inclusion where everyone can thrive at work.

Brightstar's brand launch included a global employee ambassador program, engaging more than 80 ambassadors across 15 countries. Town halls, leadership forums, webinars, lunches, and volunteering opportunities run by local Brightstar leadership councils keep employees up to date on the Company's business strategy, development, and performance. Weekly newsletter stories about the business and individual employees foster a sense of community within the global organization.

Brightstar utilizes a listening strategy that includes survey tools for employees, hiring managers, prospective candidates, and onboarding and exiting employees. An anonymous feedback tool is also available 24/7 on Brightstar's intranet. These tools gather constant feedback, helping inform future decisions that impact employees. Since 2024, the Company has hosted a series of employee

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surveys each year on timely and relevant topics that matter to employees, providing the Company with the opportunity to take swift action. Brightstar also has an Employee Advisory Committee comprised of a diverse group of employees worldwide who provide management with insights and advice on a variety of topics.

Employee training webinars focus on goal setting, performance feedback, and career and professional development to enhance capabilities while fostering a digital mindset. Brightstar also carries out specific initiatives to further embed inclusion within the business. These initiatives include:

- "The Power of We" podcast.
- Courageous Conversations: curated, facilitated inclusion learning forums.
- Change Chats.
- Spotlight: employee inclusion storytelling format.
- Sessions planned by Employee Impact Groups (EIGs), many of which provided learning and professional development opportunities and community building across a range of employee demographics.

Regulators

Brightstar's activities are subject to extensive governmental and regulatory requirements, which are constantly evolving and may vary from jurisdiction to jurisdiction. The Company continues to build on its well-established local presence and relationships with regulators in all countries where Brightstar operates, to support ongoing regulatory compliance.

Brightstar routinely engages with regulatory authorities to maintain, renew, and expand its global regulatory licensing portfolio through personal interviews, corporate visits, and routine investigations. Brightstar meets with local and global public authorities and institutions to actively provide updates on the development of the Company's operations and to demonstrate integrity, knowledge, and expertise in the conduct of the business as a reliable partner. These meetings allow the Company to stay informed on political and regulatory trends while enabling technological and product innovations in compliance with related requirements. Various engagements with gaming authorities, regulatory bodies, and industry groups enable Brightstar to expand its responsible gaming product reputation and offerings beyond jurisdictional regulations.

In Italy, the Customs and Monopolies Agency (ADM, Agenzia delle Dogane e dei Monopoli) has established a public agenda of meetings with ADM stakeholders, with the aim of making the dialogue between stakeholders and public decision-makers as transparent as possible. Through the weekly publication of this agenda, users are regularly informed about the meetings held with stakeholders and their content.

Shareholders/Investors

Retail and institutional shareholders are the owners of the Company, and Brightstar aims to ensure they can closely follow the performance of the Company through both continuous and periodic reporting. Brightstar maintains regular and proactive dialogue with long-standing shareholders, actual and potential new investors, proxy advisors, rating agencies and analysts, including on announced strategic initiatives, changes, or achievements.

Brightstar carries out several in-person and virtual non-deal roadshows, in addition to numerous ad-hoc, one-on-one meetings, with selected members of the investment community. Conferences and meetings, including equity and leveraged finance conferences, provide opportunities for analysts and actual or potential investors to directly interact with Brightstar's management. Such open dialogue also allows the Company to gain insights into investor sentiment.

Suppliers

Suppliers play a key role in Brightstar's ability to meet customer requirements. Brightstar carries out regular meetings, and is committed to periodic visits to strategic suppliers to review commercial and quality issues. Through the annual Environmental, Social, and Governance (ESG) supplier questionnaire, the Company gains valuable insights into ESG topics from its key direct material, consumable, and indirect suppliers, while also gaining a better understanding of their challenges. Brightstar also advances its Decarbonization Path through the same ESG supplier questionnaire, ultimately supporting the integration of ESG considerations into operations.

Brightstar views supplier engagement as a strategic partnership and actively collaborates with suppliers to drive continuous improvement, innovation, and risk mitigation across the supply chain. By fostering transparency, accountability, and capability building, Brightstar seeks to strengthen supplier resilience and align shared sustainability objectives. These efforts enable the Company to proactively identify emerging risks and opportunities while reinforcing responsible sourcing practices across its global operations.

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Sustainability Plan[1]

GRI 2-22; GRI 2-28

Following Brightstar's transition to a pure-play lottery Company in 2025, the business and sustainability landscape shifted significantly, requiring an evolution of the scope and objectives of the Company's sustainability initiatives.

Brightstar entered the 2026–2028 planning cycle with a renewed commitment to creating long-term value for its people, partners, and the planet. To support this direction, the Company introduced an evolved Sustainability Plan designed to guide decision-making and strengthen resilience in keeping with evolving regulatory requirements and market drivers. The evolution of the Plan was conceived as a strategic process that brought together diverse perspectives and encouraged a constructive reassessment of existing assumptions, helping the Company build a more robust foundation for its sustainability journey.

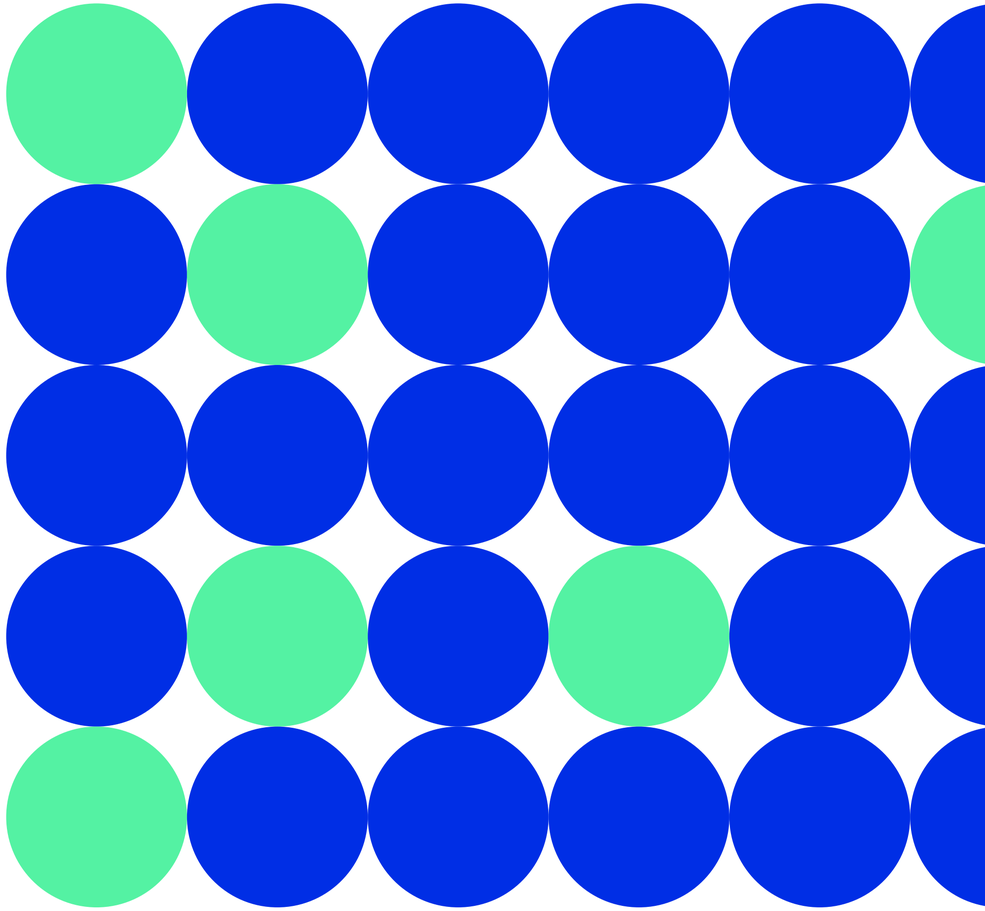
A comprehensive diagnostic phase enabled the Company to develop a clearer and more informed understanding of its operating environment. This included analyzing customer insights and monitoring emerging trends in international and domestic regulation.

Internal engagement was a key component of the process. This collaborative approach helped define commitments, actions, and goals that are aligned with the Company's strategic direction and that can be progressively implemented over time.

The resulting Sustainability Plan provides a structured roadmap that translates analysis and internal perspectives into a coherent set of priorities that address stakeholder feedback, respond to regulatory developments, and advance sustainability efforts through a measured and transparent approach.

The Plan includes targets aligned with the six spheres of impact from Brightstar's sustainability strategy, each with a specific strategic goal and timeline. As initiatives are implemented and results are evaluated, the dynamic nature of the Plan will allow the Company to refine existing targets, introduce new initiatives, or adjust priorities within the Plan's three-year timeframe. This approach will allow the Plan to evolve based on outcomes, while ensuring that targets remain relevant and focused on goals that can be successfully achieved.

Once completed, the Plan underwent a comprehensive validation and approval process with the Sustainability Steering Committee (SSC), and was acknowledged by the Nominating and Corporate Governance Committee (NCGC).



1 Brightstar's Sustainability Plan 2026-2028 is available on the Global sustainability section of the Corporate website

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SustainablePlay™
Empowering Collaborating Preserving

In 2023, Brightstar launched Sustainable Play™, which represents its commitment to leading the lottery industry in global sustainability. It celebrates the Company's dedication to its people and the planet as the Company delivers innovation and excellence that is "Ahead of the Game." Empowering Our People, Collaborating with Partners, and Preserving the Planet are the key elements driving Sustainable Play. Aligned with the UN SDGs, Brightstar seeks to advance the lottery industry with sustainable practices that benefit the Company and its key stakeholders.

Spheres of Impact	Strategic Goals	2026 Targets
Employee Engagement	Brightstar fosters a positive work environment by promoting welfare and wellbeing, as well as enhancing skills through training and development.	→ Implement initiatives that enhance employee satisfaction across the Company.
Responsible Gaming	Brightstar contributes to player protection by promoting positive play, raising awareness of responsible gaming tools, and securing third-party credibility through accreditation and research.	→ Launch a Global Positive Play Survey. → Develop a digital Customer Resource Hub to promote a positive play culture. → Expand research partnerships on responsible gaming.
Community Engagement	Brightstar engages communities by collaborating with organizations and supporting programs that foster skill development.	→ Implement the Community Engagement Strategy and related initiatives.
Sustainable Procurement	Brightstar enhances sustainable procurement by selecting responsible suppliers who prioritize environmental stewardship and ethical labor practices.	→ Develop a formal sustainable procurement framework and a corresponding action plan.
Climate Action, Biodiversity and Circularity	Brightstar enhances energy efficiency and supports the transition to renewable energy, while investing in eco-design product strategies. Brightstar promotes biodiversity and circularity by selecting environmentally conscious materials and boosting recycling, reuse, and recovery practices.	→ Define and implement a decarbonization plan aligned with science-based targets. → Extend ISO 50001 certification related to energy efficiency.

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Employee Engagement

GRI 2-23

At Brightstar, people are the heart of the organization. The Company is committed to improving employee experience through career development initiatives, regular feedback, consistent internal communication, inclusive training programs, competitive compensation, and support for work-life balance. Together, these practices help Brightstar foster a work environment that attracts and retains top talent and supports long-term, sustainable business development in line with the Company's strategy.

The Company prioritizes the preservation of its core workforce while strategically utilizing contingent workers to address fluctuations in demand. This approach helps maintain workforce stability while supporting operational flexibility and responsiveness to evolving market conditions.

Employee feedback is fully embedded in Brightstar's approach to human capital development. The Company employs a structured listening approach in various languages to capture valuable insights from employees, including biannual pulse surveys and targeted surveys designed to assess key moments in the employee lifecycle such as recruiting, hiring, onboarding, and offboarding. Additionally, Brightstar provides access to a tool called Your Voice, where employees can share feedback on any topic with the assurance of complete anonymity.

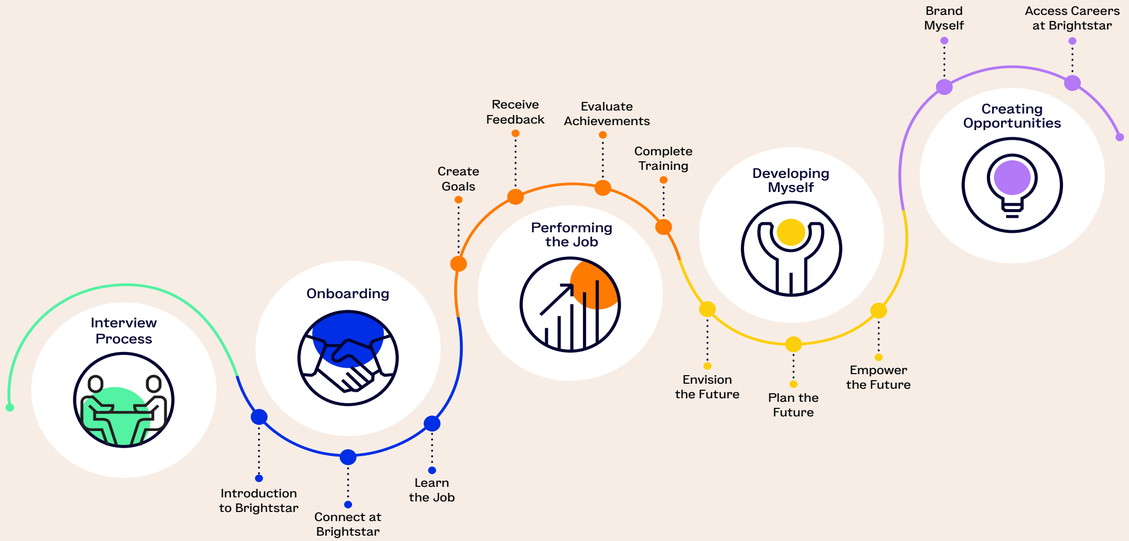
Human Capital Development

Human capital development is key for any successful organization, particularly when it comes to digital transformation, next-generation leadership, globalization, and hybrid ways of working. Career development at Brightstar is a partnership between employees, their managers, and the Company.

Employees are encouraged to take ownership of their career development, with business leaders acting as guides and the organization providing the tools and infrastructure needed to support growth. Through Brightstar's annual Integrated Talent Management (ITM) process, leaders review employee performance and potential, assigning talent indicators such as retention risk and impact of loss. This talent review process allows leaders to identify individuals within the leadership pipeline and plan for succession, supporting the development of a culture focused on employee growth.

The Employee Journey

The employee journey begins before day one, during the interview process, and continues through onboarding, performance development, career advancement, and internal mobility opportunities. Grounded in Our People Promise and commitment to Building Bright Futures, Brightstar strives to create engaging and meaningful career experiences that foster connection, authenticity, work-life harmony, and opportunities for growth from the very beginning. The onboarding process is a formal three-month experience that introduces the employee to their job responsibilities, the business, and Brightstar's culture and values. Goals are set annually and performance and skill development are regularly monitored and assessed by direct managers. Every employee is offered opportunities for professional development through global programs, such as mentoring, job shadowing, and role-specific training. Employees may also apply for new opportunities through open positions that fit their skills and career aspirations.



Brightstar believes that increasing awareness of individual strengths and areas for improvement is foundational to the competency and career development of its managers, senior managers, and directors. To support this, the Company provides structured feedback through the Leadership Practices Inventory (LPI) 360, an observer-based assessment that helps leaders better understand their leadership capabilities and take action on the insights gained. The LPI 360 measures the frequency of leadership behaviors as observed by those who interact most closely with the leader, including peers and direct reports. These objective insights support both leaders and the Talent Management team to identify development priorities and design tailored development plans for each participant.

Brightstar also uses the NOVA PROFILE assessment, a psychometric personal and professional development tool that helps individuals understand how they think, act, and interact in the workplace. It combines behavioral styles, motivations, competencies, and emotional intelligence to provide a multidimensional view of performance and self-awareness. By offering clear insights into both individual and team dynamics, it supports better communication, collaboration, and sustainable development.

Brightstar continuously enhances its reporting strategy to monitor employee and leader engagement, track progress against development goals, and ensure the quality of performance management processes, including continuous feedback conversations, preliminary performance and potential reviews, and calibration conversations. The Company has invested in a "stories reporting" tool within the SAP SuccessFactors platform, enabling People & Culture (P&C) people partners to access talent data in real time and on demand across their organizations. Through this tool, people partners can independently monitor processes using real-time data. As a result, Brightstar recorded a 100% completion rate across all phases of the Performance Management process, allowing the Talent Management team to focus on the quality of the process.



Brightstar's Internal Careers Portal

Brightstar's internal careers portal is a one-stop shop for employees looking to take their next professional step, featuring job opportunities from a variety of departments and offering a simple way to search by keyword or location. Through the portal, employees can view the full list of available opportunities, with options to filter by job title, location, and date posted. A global career opportunity map shows available roles across the Company's worldwide operations.



Our People Promise

Brightstar's Our People Promise is comprised of four core attributes: work-life harmony, a connected community, a space for authenticity and belonging, and career agility.

The Our People Promise tagline is, "Building Bright Futures," and the brand commitment is, "At Brightstar, we proudly aim to provide engaging and meaningful career experiences that constantly engage our own 'players' and drive their growth in areas that matter most to them -- in life and at work."

Internally, Brightstar showcases Our People Promise on the Company's intranet, the careers portal, during town halls, in newsletters, through an internal social media platform and in everyday social interactions. Externally, Our People Promise is featured on LinkedIn, Indeed, Glassdoor, and Brightstar's website.

Talent Acquisition Partners bring Our People Promise to life throughout the recruitment process, using it to engage prospective candidates and share authentic employee perspectives on why they joined Brightstar, what keeps them here, and the opportunities available to grow and build meaningful careers within the organization.

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Brightstar Success Profile

Brightstar's success profile is composed of nine competencies organized into four clusters. This framework helps employees focus their behavior and performance on things that matter most to the Company to drive its success.

- Leading the Business: Drive Results, Foster Innovation, and Demonstrate a Digital Mindset. These competencies define the behaviors that facilitate high ambitions, such as setting challenging goals, achieving them through new ideas, and recognizing the opportunities and tools offered by digital technologies.
- Leading Complexity: Be Flexible and Manage Change and Have Courage and Be Accountable. These competencies identify behaviors that address resilience to change and courage to share ideas, opinions, and to understand those of others to make the best decisions.
- Leading People: Collaborate with Others and Foster Inclusion and Cultural Awareness. These competencies address interpersonal skills including the ability to collaborate, trust and be trusted by others, and contribute to the creation of an inclusive working environment.
- Leading Self: Demonstrate Personal Agility and Demonstrate a Growth Mindset. These competencies relate to individual commitment and identify behaviors that support professional development, such as the ability to manage emotions and the ability to approach change with curiosity.



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Brightstar's "connecting the dots on development" roadmap empowers employees to conceptualize their career pathway, hold effective development conversations with their leaders, document actionable goals, and access learning and development solutions. All employees are provided with an individual development plan (IDP) template in PeopleCenter – the Company's primary platform for setting work goals, development objectives, performance reviews, learning activities and reporting - so they can record and track the development actions they have agreed upon with their direct manager. Employees are invited to training sessions focused on career growth and development planning, and key resources are embedded into the IDP for ease of access.

Brightstar empowers employees to conceptualize their career pathways, hold effective development conversations with their leaders, document actionable development goals, and access learning and development programs. Goals are set at the beginning of the year, with progress discussed during monthly check-ins and evaluated fully during the end-of-cycle reviews. Managers evaluate employee performance against their goals and competencies using a five-point scale. Scores are then calibrated across the entire team to ensure fairness and establish a baseline for success. All employees were assessed through this process in 2025.

A key initiative at Brightstar is MentorMe, a formal mentoring program designed to support employee development through the structured exchange of knowledge, ideas, experiences, and perspectives between mentors and mentees. This program enhances professional skills, strengthens cross-functional relationships, and promotes a sense of belonging within the organization. Brightstar also offers a job shadowing program that provides employees the opportunity to observe colleagues in different roles or departments. This hands-on experience provides valuable insights into various career paths, encourages interdisciplinary learning, and helps individuals broaden their understanding of the business. Together, these initiatives empower employees to take ownership of their development and contribute more effectively to Brightstar's success.



An Open Space for Employee Exchange

Employee feedback is an integral piece of Brightstar's development strategy. Pulse surveys are distributed throughout the year in multiple languages to capture employee sentiment about the Company and ongoing changes. The surveys are completely anonymous and ensure that responses cannot be traced back to individuals, which fosters an environment of trust and openness. The surveys are designed to gather diverse, qualitative insights, which are invaluable for understanding and enhancing the overall employee experience. To promote dialogue, Brightstar also hosts periodic open sessions where employees and other stakeholders are invited to ask questions and share feedback directly.

Brightstar tracks the effectiveness of its learning and development programs by analyzing participation, engagement, and user experience. Interactive training sessions are held at multiple points during the year in English, Italian, and Spanish, ensuring accessibility across the workforce.

In line with the Brightstar core value 'We do the right thing', Brightstar offers outplacement services to any employee globally facing involuntary separation from the Company. Outplacement services provide comprehensive support to help these employees smoothly transition to new opportunities outside of Brightstar. Each program is tailored to the individual's needs and include a wide variety of services, such as career development planning, coaching, resume assistance, interview training, networking, and job search marketing.

Feedback from employees has resulted in Brightstar setting multiple goals to address areas for improvement. These goals include clarifying the role of development in employees' growth, highlighting available development opportunities, and simplifying access to development resources. Actions taken to meet these goals include:

- Launching a simple and easy-to-use platform called Talent Central to coach and support employees in setting goals, managing performance, and developing as individual contributors.
- Enhancing Talent Central with Talent Round-Up, a monthly bulletin that showcases critical news and updates on goals, performance, and learning and development.
- Creating more engaging tools, such as a simplified and flexible IDP form, creating a development roadmap, and a focus on providing collaborative spaces to document feedback discussions.

Employee feedback highlighted three priorities for improving the ITM process, and Brightstar took action on each of them. First, the process was simplified to make it easier and more intuitive for employees to use. Second, employees were given easier access to clear, up-to-date information through search filters and customizable dashboards. Third, new feedback surveys were introduced so employees can share suggestions and help further improve the process.

Talent review and succession planning are embedded into the talent management process to ensure Brightstar is developing and retaining top talent to support long-term growth. The planning assesses employee potential, risk of attrition, organizational impact of potential departures, and identifies potential successors for key roles, including the top three leadership levels.

Brightstar provides workshops and training for each phase of the ITM process for individual contributors, people leaders, and P&C stakeholders. Dedicated SharePoint sites, including Talent Central, are also available in English, Spanish, and Italian, and provide tools and resources for all aspects of ITM. A multichannel communication and training campaign allows all employees to be educated on the behavioral expectations required for success. These expectations are consistent across all employees, regardless of level, role, and geography.

Brightstar's global approach to learning in 2025 centered on the idea that training is not only a tool for professional development but contributes to organizational transformation and supports the integration of sustainability principles. The development of people and leadership capabilities supports business transformation and long-term organizational resilience. In an environment of rapid digital evolution and increasing organizational complexity, learning opportunities strengthen leadership, foster a shared culture, and enable responsible innovation across the organization.

By investing in training and development, Brightstar strengthens its ability to pursue innovation in alignment with internal policies and applicable standards, empower its people, and build a resilient organization prepared for the challenges of the future.

Globally, Brightstar delivered an average of 43.9 training hours per employee in 2025. Through the Global Talent Management organization, Brightstar invested $1.35 million in training, covering both leadership training programs and on-demand learning resources available to all employees.

Since 2024, Brightstar has carried out an internal review that ensures the Company is engaging in experiences that directly support and meet business needs, while simultaneously focusing on employee upskilling to advance business goals. This holistic, strategic approach is driven by the desire to position Brightstar as a best-in-class organization from a development standpoint.

Brightstar is piloting a talent marketplace tool designed to enable employee development through cross-training opportunities. The Company is also beta-testing inclusive leadership capabilities within a select group, equipping people managers with capabilities to foster growth opportunities for all employees.

Brightstar is also preparing to launch several learning initiatives including the cultural intelligence learning experience within iLottery, an enterprise-wide training on brand identity and values, and a Digital Maturity Project, through which Brightstar aims to create a culture of digital acumen and upskilling.

Key initiatives include:

- Leadership and managerial development (Brightstar's Global Leadership Framework): A suite of programs tailored to different levels of seniority, including Leading Brightstar, Transformative Leadership, Leadership in Action (a new program designed in 2025 and expected to launch in 2026), and Leadership Foundation (formerly Manager Essentials 2.0, redesigned in 2025 to launch in 2026).

- Talent Development and Career Growth: Comprehensive initiatives such as mentoring and reverse mentoring, job shadowing, succession planning, and personalized career paths to support long-term professional growth.

- Sustainability and Non-Discrimination Training: Focused programs such as Ignite Inclusion, Inclusion EDGE, and the Sustainability Induction Program.

- Employee Well-being: A strong emphasis on work-life balance, psychological support, flexible work models, and family-oriented benefits to create a supportive and inclusive work environment.

Assessments and interactivity are woven into the design of most Brightstar learning courses. At the end of each training course and learning program, participants are asked to complete a questionnaire. Many of the digital learning offerings also feature pre- and post-training evaluations.

Brightstar continues to evolve its development programs to better support the growth of the leadership pipeline, with an aim to retain top talent and enhance motivation, engagement, and commitment.



Brightstar's Digital Journey

In 2025, Brightstar continued to strengthen its global, integrated learning ecosystem, designed to support leaders, managers, and individual contributors at every stage of their professional journey. A key component of this effort is Brightstar's Digital Journey, a strategic learning initiative launched in late 2025. The program is designed to accelerate the Company's digital evolution by fostering a shared digital mindset, promoting transformational leadership behaviors, and enabling the adoption of impactful and responsible digital solutions.

The journey is structured around:

- Targeted learning streams for senior leadership, vice presidents, directors, people managers, and individual contributors.

- A balanced mix of workshops, experiential learning, e-learning, and leadership conversations.

- A strong focus on critical capabilities such as leadership for digital transformation, cross-functional collaboration, agility and adaptability, critical thinking, and the responsible use of AI.

Active participation by leadership is positioned as a key success factor, reinforcing their roles as drivers of cultural and behavioral change.

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Leadership Development Across the Organization

In 2025, Brightstar initiated the redesign of its Global Leadership Framework, recognizing the opportunity to move toward a more inclusive and integrated system. The new framework aims to:

- Provide development opportunities aligned with business strategy and role requirements.
- Address leadership development needs across the entire organization, including people managers and individual contributors.
- Foster a shared language and set of leadership behaviors grounded in courage, responsibility, and vision.

This redesign represents a strategic investment in building a leadership system capable of sustaining growth, transformation, and cultural coherence over time.

The new leadership framework is composed of:

- Leading Brightstar: The highest level of the leadership journey, designed for vice presidents and above, with the objective of driving enterprise-wide alignment and strategic impact. Developed in 2025 and being put into action in 2026, the program supports leaders in shaping organizational direction, role-modeling leadership behaviors at scale, and embedding a strong, shared leadership culture. It reinforces the integration of identity (“How I Show Up”) and action (“How I Act”), with a strong focus on leading through others, influencing the system, and delivering sustainable business results.
- Transformative Leadership Program: A flagship experience for directors and senior directors, designed to strengthen their ability to shape culture, drive transformation, and lead in complex and uncertain environments. Delivered through a highly experiential, in-person journey combined with structured coaching, it enables leaders to deepen self-awareness, lead through ambiguity, and mobilize others-fostering trust, accountability, and shared purpose.
- Leadership in Action: A program designed to support managers in progressing from understanding leadership concepts to applying them fluently in complex, real-life situations. Built in 2025 and rolling out in 2026, it represents the next step after Leadership Foundations, strengthening the integration between “How I Show Up” and “How I Act.” The focus is on developing consistency, adaptability, and impact-enabling leaders to navigate ambiguity, make effective decisions, and lead teams with greater confidence and coherence.
- Leadership Foundation: An entry-level program for managers, designed to build the fundamentals of effective leadership. It combines practical tools for daily management with the introduction of a common leadership language, grounded in self awareness and the Five Practices of Exemplary Leadership. The program strengthens managers’ ability to translate leadership into everyday behaviors, improving team effectiveness, communication, and alignment with business processes.



Digital, Professional and Compliance Learning Platforms

To ensure accessibility, personalization, and scale, Brightstar continues to invest in a robust portfolio of global learning platforms, such as:

- Skillsoft/Percipio provides a comprehensive learning environment covering professional, digital, leadership, and compliance skills. The platform supports personalized learning paths, on-demand content, and continuous upskilling aligned with evolving business needs.
- Harvard ManageMentor offers in-depth leadership and management development grounded in academic rigor and practical application. The platform covers critical leadership and management topics, combining expert insights, practical tools, assessments, and real-world scenarios to support continuous, self-directed development.
- Section Coach is an AI-powered, personalized coaching platform designed to help employees build practical AI skills and apply them directly to their daily work. It acts as a virtual AI coach, adapting learning to each employee’s specific role, experience level, and business context. Through guided conversations, real-time feedback, and hands-on exercises, it supports users in developing effective prompting skills, discovering relevant use cases, and improving the way they work with tools like Copilot.

Together, these platforms enable employees worldwide to continuously develop skills while aligning learning with organizational priorities.

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A Comprehensive Training Offer for Brightstar in Italy

In Italy, the Leadership & Learning team develops an annual training catalog aligned with Brightstar's strategic priorities and emerging trends in work and innovation. The process allows managers to report their teams' training needs. In 2025, the learning catalogue included 23 courses aligned with Brightstar's strategic priorities and the skills required to navigate digital transformation and organizational change. The catalogue focused on developing digital and future-oriented skills, leadership and cross-functional capabilities, professional and managerial effectiveness, and language and communication skills.

The learning strategy is reinforced through additional initiatives designed to respond to local needs while remaining fully aligned with Brightstar's global priorities. Alongside all global programs and platforms, Brightstar in Italy offers:

- Speexx (Language Platform): supporting continuous development of English language and business communication skills through personalized and measurable learning paths.
- Ambrosetti Management and Ambrosetti Permanente: providing managers with access to high-level learning experiences focused on strategy, leadership, innovation, and global trends, fostering strategic thinking and external perspective.

AI Skills Development

In 2025, Brightstar in Italy launched a program for employees to develop digital and AI skills that support innovation, a change-oriented mindset, and the responsible adoption of new technologies. The program included courses in FutureCraft, Innovation & Creativity, AI for Business, Marketing & AI, and Prompting & Communication with AI.

Engaging Employees in Sustainability

At Brightstar, engaging employees in sustainability is a structured and evolving journey. In Italy, this commitment has taken shape through a dedicated Sustainability Induction Program, designed to build awareness, foster participation, and embed sustainability principles across the organization.

The program was originally launched in 2023 with the objective of providing employees with a shared understanding of Brightstar's sustainability commitments, priorities, and impacts. In 2023 and 2024, the program included four webinars, combining strategic vision with practical insights. The webinars featured contributions from internal experts and renowned external speakers, to demonstrate that sustainability is a strategic priority, creating moments of dialogue and reinforcing the link between global sustainability strategies and local action. This approach contributed to increased engagement, stimulated dialogue, and helped employees connect their daily work to wider environmental and social challenges. In 2025, the Company began the process of redesigning the program to address the sustainability topics that matter most to employees, where employees think knowledge gaps exist, and target the skills needed in daily work.

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Encouraging Work-life Balance

Brightstar is committed to people management through diverse initiatives that support work-life balance and foster a sense of belonging within the corporate community.

Brightstar takes pride in supporting and encouraging employees' work-life balance and offers various ways of working. Depending on the role and its requirements, employees can request alternative working arrangements that span from fixed in-office, fully remote, or hybrid work locations. Brightstar also allows employees to meet core working hour requirements while adjusting their hours to manage personal responsibilities if needed. Work schedules can range from part-time to full-time, in accordance with local regulations. In all countries where the Company operates, Brightstar abides by regulatory requirements regarding working hours and flexibility.





Right to Disconnect

Brightstar in Italy, in compliance with applicable Italian legislation, applies the right to disconnect for employees with cohabiting children under the age of 16, ensuring that they are entitled to disconnect from work-related digital activities after completing eight hours of computer-based work.



Flexible Friday Program

The Flexible Friday program, which supports work-life balance and contributes to organizational efficiency, is a vital component of Brightstar's efforts to cultivate a positive and productive workplace culture. This program allows eligible employees to work a modified schedule on Fridays from the end of May through the beginning of September if their manager approves and adequate coverage is ensured. Through this program, employees may either work half-day Fridays or take every other Friday off entirely. While the Company encourages eligible employees to consider Flexible Fridays to support work-life balance, employees are also urged to make full use of paid time off throughout the year to recharge and manage stress, which is considered important for supporting employee well-being, the Company, and its customers.



Supporting Mental Health

Brightstar recognizes that employees may face personal and professional pressures that can affect their well-being. To support mental health, resilience, and overall wellness, the Company provides a range of resources at no cost to employees and their families worldwide. These benefits are designed to promote balance, strengthen individual well-being, and support a healthier work-life experience.

Brightstar's Emotional Well-being Solution (EWS) is a Company-paid benefit that provides confidential support for everyday challenges as well as more complex personal matters. Available around the clock, the service gives employees and their family members access to dedicated support whenever needed, reinforcing Brightstar's commitment to employee care and well-being across its global workforce.



Global Guidelines – Our Ways of Working

Brightstar has established guidelines for people leaders to consider when classifying a role as fixed (in-office), flex/hybrid (in-office/remote combined), or fully remote. In addition to assessing job requirements, managers need to consider the work environment in which individual employees thrive.

Some employees may thrive in a fully fixed or remote setting, while others may benefit from having regular work time in a Brightstar facility. The Company understands that flexibility in working arrangements is dynamic, and these guidelines are reviewed and updated as needed. In the event of a conflict between the guidelines and local or state laws and/or any applicable collective bargaining agreement, the latter shall prevail.

Internal surveys have shown that all employees, including those in flex roles, seek and desire opportunities for in-person collaboration, although the frequency for such interactions varies across the business. For this reason, newly renovated locations feature neighborhood-style workspaces, providing flex employees with shared spaces for collaboration and work.

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Brightstar is the Place to be

In 2025, Brightstar was recognized as a Top Employer in Italy and the U.S. for the third year in a row. The Top Employer Certification, awarded by the Top Employers Institute, honors organizations for their people processes and independently certifies that Brightstar is an employer of choice. The certification was granted in recognition of the Company's people strategy, which includes the commitment to sustainability, non-discrimination, and ethical operations. It also encompasses Brightstar's work in digitization, talent acquisition, professional and leadership development, well-being, and performance management. Brightstar operations in Chile, known through the commercial services brand "Sencillito," have also been recognized with a Great Place to Work certification.

top EMPLOYER United States of America 2025 FOR A BETTER WORLD OF WORK

top EMPLOYER Italia Italy 2025 FOR A BETTER WORLD OF WORK

Life is a Master at Brightstar in Italy

In 2025, Brightstar continued its relationship with Lifeed in Italy, a global EdTech company that creates innovative digital solutions for human capital development and sustainability. The "Life is a Master" program is a digital self-coaching path that helps individuals develop key skills to promote their well-being and foster a true synergy between life and work. This program is based on the concept of Life Based Learning, delivered via an online platform. The program focused on a thoughtful analysis of the different roles people play daily, both at work and at home and how each of these roles prepares individuals for various scenarios throughout life. For the kick-off event, Brightstar introduced the self-discovery platform MultiMe Finder, allowing employees to discover all the skills they have from their daily life.

Brightstar also launched a series of 60-minute webinars in collaboration with Lifeed focused on adapting to change at Brightstar. These sessions provide information and connection among people across the Company, fostering knowledge sharing, a sense of belonging, greater awareness around the relationship between life and work, and the development of cross-functional skills.

Kids' Day

"Vengo anch'io" (kids' day) is a special two-day event at Brightstar in Italy allowing employees to bring their children to work. The 2025 event was designed and organized in collaboration with Codemotion, a platform and a community that organizes courses and events on the introduction to science, technology, engineering, and math (STEM). Depending on their age group, participants engaged in interactive technology and STEM labs and educational activities.



Encouraging Education with Futurely

Brightstar in Italy deployed Futurely, a fully digital, effective, and engaging guidance program for education and parenting. Following the success of the initiative in 2022—originally aimed at helping high school students navigate their path toward university and life after graduation—the project has constantly expanded year after year.

The 2025 program helped 26 individuals ages 12 to 18 discover their own potential and make decisions for their future careers. It also provided their parents with useful tools to help the students reach their full potential.

The 2025 program introduced a new "Parenting" program for parents with children from newborn to six years old, and helped them to tackle daily parenting challenges with practical tools, turning difficulties into opportunities, and promoting autonomy, curiosity, and courage.

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Rewards and Benefits

Brightstar maintains a total rewards philosophy designed to attract, retain, and motivate talent across all geographies while aligning pay outcomes with business performance and long term value creation. Brightstar provides market based, locally competitive compensation, benchmarked against relevant peer groups and survey data to ensure external competitiveness.

The Compensation Committee of Brightstar's Board of Directors is a standing committee of the Board of Directors composed entirely of independent directors. The Committee holds primary oversight responsibility for the design, administration, and integrity of the Company's executive compensation programs — including Short-Term Incentive (STI) and Long-Term Incentive (LTI) plans — and ensures that pay practices are consistent with the Company's performance objectives, risk management policies, and sustainability commitments. The Compensation Committee plays a central role in:

- Reviewing and approving base salary, target incentive opportunities, and total compensation for the CEO and all executive officers.
- Evaluating whether compensation structures create inappropriate risk-taking incentives and reviews clawback, anti-hedging, and ownership policies.
- Approving STI and LTI plan structures, performance metrics, weightings, and payout schedules on an annual basis.

The Compensation Committee engages with external independent compensation advisors to provide market data, governance insights, and update on relevant regulatory developments. Internal stakeholders support this process to ensure:

- Compliance with applicable laws and listing standards.
- Alignment with approved policies.
- Robust internal controls and documentation.

Compensation practices are governed by a global framework, while allowing flexibility to follow local market practices, statutory requirements, and regulatory environments. Brightstar's market-focused approach to compensation is intended to be competitive with regards to broad-based pay, short- and long-term incentives, sales commissions, bonuses, rewards, and recognition opportunities.

The Brightstar compensation team participates in multiple global, regional, and local salary surveys to obtain relevant market data. Pay ranges are established for every role and are continuously updated. Offers of employment are reviewed by the team to ensure that offers are market-driven and uphold internal equity standards. Employee pay may vary based on role, skills, experience, performance, and internal equity considerations, reinforcing a pay for performance culture.

Brightstar's compensation programs and initiatives are designed to reward employees for their contributions, and support talent attraction and retention. Brightstar's performance-based pay structure is intended to incentivize and motivate employees while providing meaningful rewards and recognition.

Brightstar evaluates its progress on compensation and incentive related objectives through a combination of:

- Performance against defined incentive plan performance measures
- Annual compensation and pay-equity analyses.
- Board level oversight through the Compensation Committee.
- External transparency through Global Reporting Initiatives aligned disclosures and ESG questionnaires.

Progress is assessed annually through formal performance evaluation cycles and governance reviews rather than through a single standalone KPI framework.

In 2025, Brightstar implemented a redesigned global compensation framework, transitioning from multiple market reference points to a consistent "min mid max" salary range methodology across all roles and geographies. The new framework strengthened internal equity and defensibility of pay decisions, improved manager understanding of pay positioning, and supported compliance with evolving pay transparency and equal pay regulations.

As part of Brightstar's organizational transformation, the Company continued refining its job architecture and career pathways throughout 2025 to better support its evolving structure. This included updates to the job hierarchy and leveling framework, establishing clearer connections between role scope, career progression, and compensation opportunities. These efforts enhanced consistency in job evaluation and compensation decisions, while improving transparency and providing employees with greater clarity around career growth.



Incentive Programs to Boost Performance

Brightstar uses a combination of short- and long-term incentive programs to reinforce performance, accountability, and alignment with the Company's strategic and sustainability objectives.

Short-Term Incentives

- Annual cash-based incentives are available to eligible employees based on career level and role.
- Performance is assessed against financial objectives, business priorities, and individual or functional goals.
- For senior leaders and executives, Management by Objectives (MBOs) may include people, and sustainability related objectives, such as employee engagement, talent, culture and inclusion progress, and execution of key sustainability initiatives.

Long-Term Incentives

- Equity based awards for executives and senior leaders, typically with multi-year performance or vesting periods.
- Designed to promote long term value creation, retention of critical talent, and alignment with shareholder interests.
- Performance conditions are primarily financial or market based, reinforcing disciplined capital management and sustainable growth.

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All Brightstar employees are eligible to participate in Spotlight, the Company's rewards and recognition program, where employees may nominate their colleagues for upholding Brightstar's core values.

As a global employer, Brightstar strives to ensure the health and well-being of its employees and their families by offering a variety of benefits; whether considered statutory, mandatory, or discretionarily market-competitive, in the countries where employees live and work. The overarching philosophy is to comply with all local requirements and market norms, but primarily focused on the following:

- Medical/health insurance
- Life and disability insurances
- Retirement provision
- Parental leave
- Paid time-off

Since 2023, Brightstar broadened the application of its employee assistance program (EAP) to all employees globally, further promoting wellness and mental health.

Fostering and Measuring Engagement

Employee engagement is linked to individual and team performance, customer satisfaction and loyalty, employee retention, quality of service, safety metrics, profitability, and market share growth. There are several factors that influence employee engagement, including a healthy work environment, leadership presence and expectations, work-life integration, and an inclusive culture that values diverse employee contributions and personal and professional experiences.

Conducting routine pulse surveys, monthly check-ins, and open house sessions for its employees enables Brightstar to quickly identify and address any emerging issues or concerns before they escalate. Training programs are conducted in multiple languages and are designed to be accessible to all employees, reducing the risks of exclusion or disengagement within the global workforce. Brightstar continuously evaluates employee feedback on its programs and adjusts accordingly, which helps the Company remain responsive to evolving needs.

Brightstar's engagement management follows a two-level approach. The first level relates to corporate climate and the employee experience, with the P&C team ensuring transparency of policies, clarity of guidelines, and effectiveness of tools for managers. The second level falls under the responsibility of direct managers, with support from P&C, and is linked to how comfortable employees feel in their roles, their relationships with their managers and teams, and their alignment with Brightstar's corporate strategy.

Brightstar leverages predictive analytics and statistical methodologies to generate forward-looking insights from workforce data. These metrics help identify employees who may be at risk of leaving and enable projections of workforce trends and potential outcomes over the next three to five years under current conditions. By analyzing historical data, the Company can detect patterns and indicators associated with retention risk among employees in the leadership pipeline, allowing for the implementation of targeted strategies to improve retention and reduce turnover. In addition, enhancements to P&C dashboards provide leaders with timely, data-driven insights to support workforce planning and decision making. Brightstar also introduced "stay interviews," which offer valuable feedback on employee engagement and satisfaction, helping the Company proactively address concerns and strengthen retention before employees consider leaving the organization.

By monitoring employee turnover and related demographic data, Brightstar can identify trends and focus retention efforts on specific employee groups. To better understand the reason for employee departures, Brightstar uses a structured exit interview guide to help people partners gather feedback from departing employees. Additionally, employees may provide anonymous feedback through an exit survey. Insights from these interviews and surveys help Brightstar identify and address potential issues affecting employee experience. One example is the Company's outplacement program to provide stronger support to employees following separation from the organization. The program was subsequently recognized as a best practice as part of the 2026 Top Employer certification.



Employee Advisory Committee

The Employee Advisory Committee (EAC) is comprised of 17 employees, representing a diverse range of functions, skills, and perspectives from across the global organization. Its mission is to foster open communication and provide employee feedback that helps enhance engagement throughout the Company. EAC members are selected through a comprehensive nomination process and serve a one-year term, which includes participation in monthly meetings.

This diverse group of employees provides advice and counsel on a variety of topics, including employee morale, the overall work environment, Company programs and policies, recurring themes raised by employees, and internal communications. The perspectives shared by current and former committee members help leaders better understand employee experiences and sentiments across the global workforce.

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Human Rights

GRI 2-23; GRI 2-24 ;GRI 2-25; GRI 2-30; GRI 403-1; GRI 403-2; GRI 403-3; GRI 403-4; GRI 403-5; GRI 403-6; GRI 403-7; GRI 408-1; GRI 409-1; GRI 3-3

All people are entitled to fundamental rights as humans. Brightstar regularly evaluates its Human Rights Policy to establish principles and practices for the respect and wellbeing of those in the communities in which it operates. Human dignity and welfare are among the core tenets.

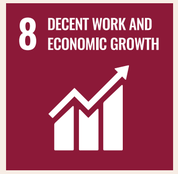
The Policy is a tool through which its sustainability strategy is outlined. In particular, this policy is linked to the Human Rights and Employee Engagement spheres of impact, and supports two of the three key elements of the Sustainability Strategy: Empowering Our People and Collaborating with Partners.

Brightstar's Human Rights and Employee Engagement activities support three of the UN SDGs:



Good Health and Well-Being

Ensure healthy lives and promote well-being for all, at all ages.



Decent Work and Economic Growth

Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.



Reduced Inequalities

Reduce inequality within and among countries.



Brightstar has established measures to support the health and safety of its employees, and promote a positive and inclusive environment. Brightstar is committed to respecting and protecting the human rights of all employees according to the principles derived from international conventions. As of December 31, 2025, Brightstar has approximately 6,000 employees worldwide, representing a multicultural environment where individual needs are respected and valued.

The Universal Declaration of Human Rights (UDHR), created more than 75 years ago, is the first-ever attempt to establish a global consensus on the meaning of human rights. It exists in over 500 languages and provides the basis for what is considered to be "universal" and "inalienable" human rights. Article 1 of the UDHR says, "all human beings are born free and equal in dignity and rights." Article 2 states, "no one shall be discriminated against in the enjoyment of the rights laid down in the Declaration on the grounds of race, color, sex, language, religion, political or another opinion, national or social origin, property, birth, or another status."

Brightstar is a member of the UN Global Compact network, which derives human rights principles from international conventions, including the International Bill of Human Rights, the UDHR, and the fundamental conventions of the International Labor Organization (ILO). The 10 Principles of the UN Global Compact reiterate the UDHR universal rights and, aligned with the UN Guiding Principles on Business and Human Rights, explain how human rights, including the right to equality and non-discrimination, can be addressed in business.

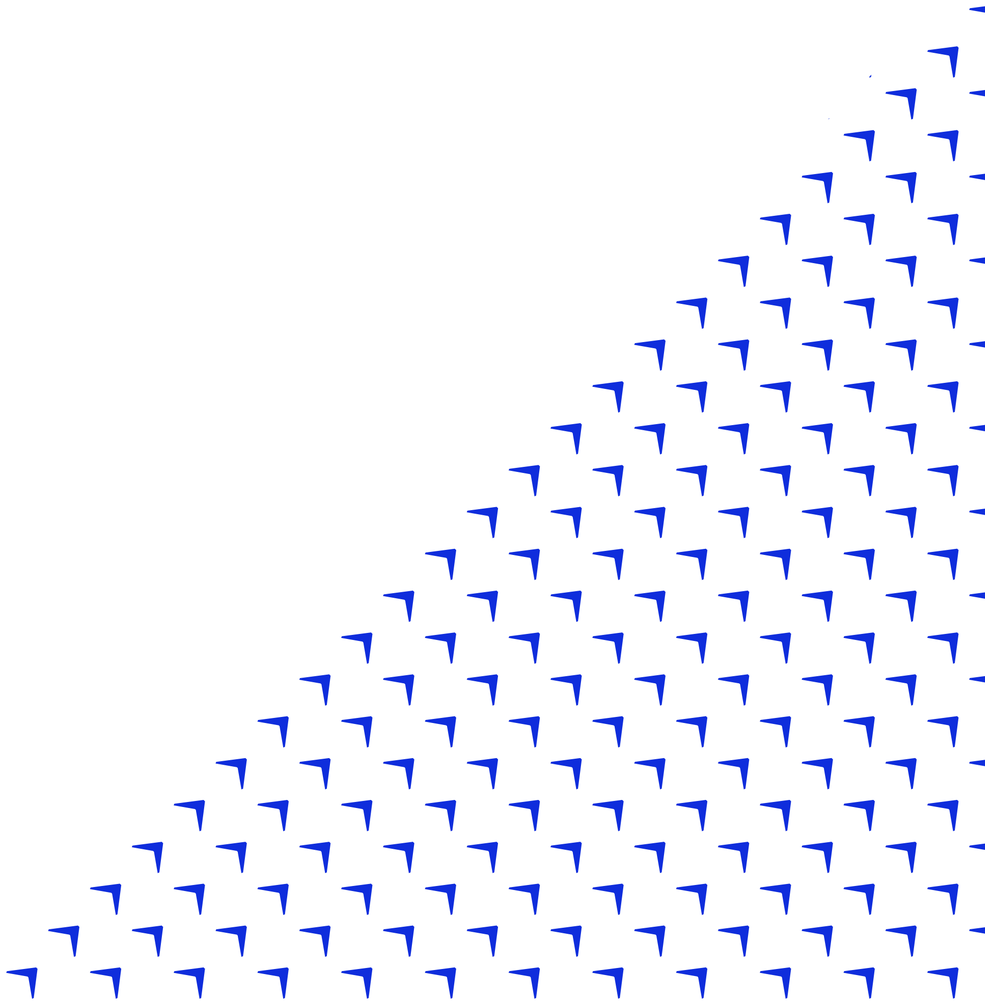
Fundamental to Brightstar's commitment to human rights protection and promotion are three principles:

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.
- Principle 2: Businesses should make sure that they are not complicit in human rights abuse.
- Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation.

According to Principle 6, discrimination in employment and occupation refers to any distinction, exclusion or preference that places certain individuals in a disadvantaged position in the labor market or the workplace because of their race, color, religion, sex, disability, political opinion, national extraction, social origin, or any other legally protected status under applicable local, state, or federal law.

Brightstar's Human Rights Policy governs its approach to human rights and modern slavery. It affirms the Company's commitment to advancing human rights within Brightstar and in the communities in which it does business, particularly around the Company's employment practices.

The Policy also reaffirms Brightstar's commitment to prohibiting child, forced, or compulsory labor, providing equal opportunities for employment, and fostering a work environment that values workplace inclusion and respect for all employees. The Policy outlines the Company's dedication to fair working conditions, including terms and conditions of employment, remuneration, working hours, health and safety, holiday entitlements, and benefits, which are all subject to applicable territory-specific labor law and/or collective bargaining agreements.



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Human Rights Policy Principles

Brightstar strives to meet its responsibility to uphold human rights by acting in accordance with the following principles:

- Child Labor - The Company believes that all children have the right to receive an education and to enjoy their youth. Exploitation of children is antithetical to human progress. Therefore, Brightstar prohibits the employment of any person under the age of 18 or under the minimal working age that may apply based on local labor legislation, if higher, for any purpose other than educational, and strictly prohibits any minor from engaging in work which requires exposure to hazardous conditions. Brightstar is committed to respecting and promoting children's rights in all its activities, in accordance with the Children's Rights and Business Principles. This commitment extends beyond the prevention of child labor and includes the protection of children's welfare, safety, education, and participation in the communities where the Company operates.

- Corruption - Corruption is a major roadblock preventing people and communities from reaching their full potential, as it cripples the Company's institutions and degrades the Company's values. Brightstar observes all relevant laws and regulations in the places in which it operates and implements extensive internal safeguards against unscrupulous practices. Brightstar maintains robust control procedures, including defined approval processes, segregation of duties, monitoring, and audits, to prevent and detect improper conduct. The Company promotes transparency through accurate record keeping, clear documentation, and accountability across all business activities.

- Disciplinary Practices - Brightstar demands that all employees be treated with dignity and respect. The Company has zero tolerance for the use of corporal punishment, mental or physical abuse, or other forms of inhumane treatment towards the Company's employees.

- Forced or Compulsory Labor - The Company's policy is to ensure that all people possess freedom of choice and movement in partnership with Brightstar on mutually agreed terms. The Company strictly prohibits any form of forced or compulsory labor, including but not limited to compulsory prison labor, indentured or bonded labor, and any form of slavery or human trafficking.

- Freedom of Association and Collective Bargaining - Brightstar recognizes the right of the Company's employees to form and join unions, as well as the right to collectively bargain through a legally recognized organization. Brightstar condemns efforts to harass, intimidate, or retaliate against anyone based on their decision to engage in such activities. The Company is committed to negotiating in good faith with a union's authorized representatives to ensure mutual success.

- Health and Safety - The health and safety of employees is a guiding value of the Company. Brightstar's commitment is to comply with all applicable laws, regulations, and supplemental internal guidelines, while continuously improving industry-leading practices. Brightstar also aims to instill a culture of vigilance, and employees are encouraged to bring any workplace concerns to the Company's attention, so that identified risks can be investigated and remediated. Brightstar also has a commitment to continuous improvement and monitoring safety KPIs.

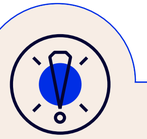
- Human Capital Development - Brightstar is committed to the ongoing training and development of its employees, facilitating an environment and culture of continuous growth. The Company creates learning experiences that meet people where they are in their career, whether that be leaders, people managers, or seeking to maximize their performance capabilities. This includes instructor-led courses as well as e-learning opportunities. Additionally, the Company is launching an AI training program across the enterprise to ensure AI adoption and capability-building, so that all employees have the chance to enhance their AI proficiency.

- Human Rights and the Community - Brightstar is mindful that its activities impact the communities where it operates. Brightstar is committed to respecting local rights and helping communities flourish. Accordingly, the Company strives to be a good neighbor and partner by actively engaging in communications with stakeholders and undertaking efforts to positively impact local educational, social, and economic development. In addition, the Company's approach includes working to identify, assess, and mitigate potential adverse impacts on human rights from its operations.

- Human Rights and the Environment - Brightstar believes that protecting the environment is vital to protecting humans and promoting human rights. In addition to ensuring compliance with all relevant laws, the Company is committed to implementing sustainable practices through its programs to reduce emissions and energy consumption and increase energy efficiency. Such programs are administered in accordance with responsible and careful management of manufacturing processes, distribution activities, and material use. Finally, Brightstar minimizes the impact of waste production and ensures the efficient use of water. The Company is continuously evaluating its practices to ensure that it is a good steward of the environment.

- Inclusivity - The Company recognizes that diverse backgrounds, experiences, abilities, and perspectives contribute to a fair and inclusive culture that allows everyone at Brightstar to feel valued, respected, supported, and engaged. The Company does not discriminate when making decisions about hiring, promotions, training, professional development, and compensation levels. The factors on which it bases these decisions are competence, performance, and merit.

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- Non-Discrimination - Brightstar condemns any form of discrimination, harassment, or bullying in all interactions, whether it involves coworkers, applicants, customers, or members of the public. Every person is to be treated with the utmost respect and decency regardless of race, nationality, citizenship, religion or belief, age, gender, sexual orientation, gender identity or expression, marital status, pregnancy or parenthood, veteran status, physical or mental disability, genetic information, or other legally protected status under applicable law.

- Privacy - Safeguarding the privacy of personal data is critical to maintaining trust and personal dignity. The Company recognizes that the modern world has generated enormous challenges concerning the generation and dissemination of information. Brightstar's commitment is to conscientiously collect, utilize, and store data in compliance with all relevant laws and Company policies.

- Rights of Indigenous Peoples - Brightstar respects and promotes the rights, the territories, and the customs of Indigenous people around the world. The Company believes that Indigenous people have the right to preserve their unique customs, traditions, and institutions free from interference, while enjoying the rights available to all others in broader society free from discrimination. The Company is committed to maintaining a constructive dialogue to address concerns regarding potential detrimental impacts of its operations on these communities.

- Wages and Hours – Brightstar compensates employees in full compliance with all applicable laws, regulations, and collective bargaining agreements. The Company is committed to fair and equitable pay, including equal pay for work of equal value based on objective job-related criteria. Brightstar also supports employees' personal needs and promotes a healthy work-life balance.

The Company's dedication to the promotion of human rights is aimed at upholding these principles across its operations and value chain. A solid governance, led by the SSC, is structured to support the implementation of these principles. The Company believes respect for human rights is an essential commitment for companies to make a safer and fairer working environment for all individuals.

Brightstar implements its Human Rights Policy by applying its principles in daily business operations, training employees on their application, and taking appropriate disciplinary action, up to and including termination of employment, in cases of policy violation (except where prohibited by law or contrary to local collective bargaining agreements).

Brightstar conducts due diligence as part of its responsible business framework to identify, prevent, mitigate, and address actual and potential adverse impacts related to human rights and responsible business conduct. The Internal Audit department is responsible for auditing adherence to the Human Rights Policy throughout the Company's operations.

The Company is committed to advancing human rights and strengthening its culture by fostering awareness and sensitivity around the principles it upholds. As part of the human rights strategy, Brightstar publishes the Policy on its website to encourage suppliers to observe the principles as well.

Brightstar's approach to human rights is also reflected in the Sustainable Procurement Policy, which establishes guidelines and prudent business practices for all employees involved in the procurement process, and the Global Sustainability Policy, which defines the framework and governance structure for the Company's sustainability efforts.

Additionally, Brightstar requires all employees to annually, and upon hiring, acknowledge its Code of Conduct, and complete the human rights training, which includes an acknowledgement that they have reviewed and agreed to abide by the Human Rights Policy. In 2025, 100% of employees completed the Code of Conduct and Human Rights trainings.

Brightstar's policies demonstrate how due diligence is applied in practice, including through risk-based processes across key compliance areas. Collectively, these policies and disclosures confirm that Brightstar's commitment to responsible business conduct includes proportionate, risk-based due diligence tailored to applicable regulatory, human rights, and ethical considerations.

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Promoting Human Rights Along the Value Chain

To promote sustainability along the value chain, Brightstar developed a framework to engage suppliers and help ensure that human rights principles are shared and respected outside the Company's operations. Brightstar's strict human rights policies form the foundation of the Supplier Code of Conduct and ESG Supplier Qualification Questionnaire that suppliers are required to complete annually. Combined with routine external audits, the supplier code of conduct sets the Company's human rights' expectations that all suppliers should meet.

Brightstar maintains contractual standards prohibiting forced labor, including requirements for suppliers to uphold voluntary employment, provide freedom of movement, avoid debt-bondage practices, and maintain transparent employment records.

For more details please refer to the Selection Process for Vendors in the Sustainable Procurement section of this report.



Brightstar's Zero-Tolerance Approach to Modern Slavery

Modern slavery is a crime and a violation of fundamental human rights that can take various forms including slavery, servitude, forced and compulsory labor, and human trafficking. At its core, modern slavery involves depriving a person of liberty to exploit them for personal or commercial gain.

Brightstar has a zero-tolerance approach to modern slavery throughout its business and supply chain. The Company is committed to acting ethically in all its business dealings, and utilizes systems designed to reduce, and ideally prevent, the risk of the Company doing business with any company or individual that practices, tolerates, or in any way facilitates, modern slavery. Brightstar performs thorough pre-employment screenings to help ensure that all candidates are engaging in employment voluntarily and are not subject to coercion or exploitation. Background checks and other employment verifications also help safeguard against the risk of hiring someone under unfair conditions.



Brightstar Joined the Business and Human Rights Accelerator

The Business and Human Rights (BHR) Accelerator is a six-month program designed to help companies across industries and regions participating in the UN Global Compact turn their human and labor rights commitments into actions. By identifying human rights impacts, establishing ongoing due diligence processes, and developing actionable plans, the BHR Accelerator empowers companies to advance their human rights journey with the following benefits:

- Identify and assess actual or potential adverse human rights impacts.
- Learn how to integrate those findings across company processes and take appropriate action.
- Track the effectiveness of measures and processes to evaluate if they are working.
- Communicate how human rights impacts are being addressed and demonstrate progress to stakeholders.
- Build a network of peers, UN partners, and experts to support the human rights journey and collaborate to address persistent barriers to implementing effective human rights due diligence processes.

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Inclusion and Non-Discrimination

Brightstar's commitment to inclusion drives its pursuit of creating a more equitable and inclusive workplace. Inclusion has been an integral part of its corporate culture, guiding the Company to foster belonging across all levels of the organization by listening, learning, and taking bold actions to address new challenges and opportunities that impact business and communities.

The Company continuously evaluates inclusion strategies and programs, evolving to meet the needs of stakeholders.

Brightstar constantly works and aims at fostering a fair and inclusive culture through the initiatives described below, that value unity, difference, and belonging in its people, players, customers, and communities. The expected future outcomes of Brightstar's inclusion efforts include:

- Maintaining teams with a strong sense of belonging.
- Ensuring teams have managers and leaders who consciously support inclusion.
- Encouraging teams with a diversity of experience, perspective, and background through more inclusive development and growth opportunities.
- Improving talent engagement and retention.

A Broad Policy and Guidelines Framework for Inclusion

Brightstar is constantly updating a comprehensive framework of internal policies and guidelines to help maintain a truly inclusive working environment:

- Human Rights Policy - Global
- Accommodating Employees and Applicants with Disabilities Requests for Reasonable Accommodations Policy - U.S.
- Workplace Gender Transition Guidelines – U.S.
- Equal Employment Opportunity and Non-Discrimination Policy - Global
- Non-Harassment and Bullying Policy - Global
- Safe and Healthy Work Environment Policy – Global
- Standard of Conduct and Performance Policy - Global
- Religious Accommodations Policy – U.S.
- Service and Emotional Support Animal Guidelines – U.S.
- Sexual Harassment Policy – U.S.
- Supplier Diversity Commitment Letter - Global



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Broadcasting Inspiring and Thought-Provoking Stories

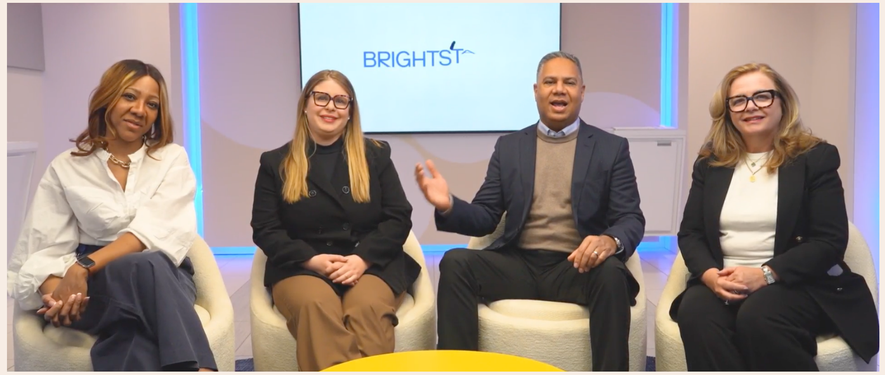
In 2025, Brightstar continued to deliver engaging content through a variety of formats, including podcasts, long-form spotlight videos, and live Courageous Conversations and Change Chats.

The Power of We Podcasts are short, thought-provoking videos focused on crucial topics surrounding inclusion and related notions. The three episodes released in 2025 included guest interviews and highlighted the latest inclusion concepts. The goal of the podcast is to further embed inclusion into the way people behave, interact with each other, collaborate, approach business decisions, and ultimately assist in showcasing themselves as leaders, whether they manage others or contribute individually.

Inclusion Spotlight highlights inspiring stories and perspectives from diverse voices within the Brightstar community. These sessions feature conversations with colleagues about their inclusion journeys.

With four sessions of Courageous Conversations held in 2025, these live, interactive sessions fostered open dialogue and understanding while building empathy. This is a forum to ask difficult or uncomfortable questions, raise concerns, or add to one's knowledge toolkit – all without being judged.

Change Chats are one-hour, interactive sessions where employees can share their feelings, ask questions, and develop tools to become more effective at navigating change, all in a non-judgmental environment of psychological safety. Five sessions were held in 2025.





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Supporting Employee Impact Groups (EIGs)

One of the primary vehicles for engaging employees in inclusion initiatives is through the Company's nine EIGs.

EIGs are employee-led, executive-sponsored networks structured around dimensions of identity and affinity, which foster inclusion, connection, and professional growth across the organization. Brightstar's EIGs are open to all employees, regardless of identity or group affiliation, and play a key part in Brightstar's inclusion strategy, offering employees opportunities to engage with peers who share similar backgrounds or interests, while supporting broader organizational goals and contributing to corporate culture.

ACE (Advancing Cultural Education) - Committed to advancing people of African descent within the lottery industry through professional development, networking, promoting inclusion and a sense of belonging, and creating positive connections within communities.

H.O.L.A. (Hispanic Organization Leadership in Action) - Committed to advancing people of Hispanic/Latino descent through professional development, networking, promoting a sense of belonging, and creating positive connections within communities.

Military - The mission and goal of the Military EIG is to not only support those who have served in the armed forces through recruitment, engagement, and development, but to also be there for those who identify as part of the military community - friends, family, loved ones, and caregivers.

NEXGEN - Recognizing the professional contributions and development of millennial and gen Z employees while embracing how this generation communicates, learns, and engages in the workplace.

PRIDE (Pluralism. Respect. Integrity. Diversity. Égalité.) - Creating a workplace where LGBTQ+ employees can thrive, be safe, supported, and empowered to participate in the organization as their full, authentic selves.

WoW (Wealth of Wisdom) - Working to understand the unique issues and opportunities of Brightstar employees ages 50 and older while fostering intergenerational collaboration.

Well-Being - Cultivating a workplace where mental health is a priority. Raise awareness, offer support and build an inclusive community that values and empowers every employee on their journey. Creating an environment where well-being thrives.

Super Abilities - Promoting the rights of and empowering people with disabilities.

WIN (Women's Inclusion Network) - Empowering women at Brightstar through networking, professional development, and mentorship opportunities.

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Brightstar's EIGs showcase what individuals can accomplish together by supporting under-represented segments of the workforce such as military members and veterans, people of color, women, individuals with disabilities, Hispanics, millennials, members of the LGBTQ+ community, individuals ages 50 and up, and all those seeking to bolster their well-being.

Brightstar's EIGs play a key role in attracting, retaining, and developing talent, fostering inclusion, and driving business innovation.



Purpose and Importance of EIGs

EIG activities primarily focus on internal engagement, but may also include external components including recruitment events, community engagement activities, professional associations, and cultural celebrations. Executive leaders serve as sponsors and provide guidance, coaching, and advocacy. They help remove organizational barriers, review progress, and communicate results to the organization. The EIGs:

- Provide a forum to share career interests and experiences to aid professional growth and satisfaction.
- Provide education about underrepresented groups to dismantle misconceptions and stereotypes.
- Foster an environment that welcomes, leverages, and enhances the experience and skills of employees.
- Promote appreciation and respect for individuals, creating a more comfortable and safer workplace.
- Provide professional development, mentoring, and networking opportunities.
- Promote inclusion efforts across the organization.
- Assist in structured events, activities, and community outreach programs.

Brightstar's EIGs epitomize employees supporting employees to strengthen how people can come together and foster a culture centered on ideation, creation and delivery. Despite being a year marked by significant transition, the spirit and momentum of the Company's culture did not stall.

By 2025's end, Brightstar's inclusion ecosystem was anchored by nine global EIGs. This global footprint was complemented by one regional Superabilities chapter in Italy and six regional Women's Inclusion Network chapters, with the goal of both global consistency and regional adaptability.

Throughout 2025, EIGs played a critical role in sustaining connection, culture, and education across the organization. Their contributions accounted for the following programming:

- 11% of activity was dedicated to days and months of recognition, ensuring that key cultural and heritage moments were honored and made visible across Brightstar.
- 17% of programming focused on education and awareness, expanding employees' understanding of differing perspectives, identities, and lived experiences.
- 51% of all activity was anchored in member-connected events, which proved indispensable during the year's organizational transaction, offering employees continuity, community, and a sense of belonging.
- 70% of all inclusion programming was hosted by EIGs, focusing on: member connection, inclusion learning, days of recognition, education/awareness, empowerment.

EIGs also demonstrated the ability to directly support Brightstar's broader business goals. In 2025, one of the top priorities was advancing technology adoption and leveraging AI across the organization. The ACE EIG hosted two of the highest attended EIG events of the year: Unlocking the Power of Artificial Intelligence. This two-part series drew nearly 1,000 employees, making it one of the largest and most influential programs. It helped employees deepen their understanding of AI and supported a core business objective by building confidence and capability in emerging technologies. EIG contributions in 2025 ensured that inclusion at Brightstar remained active, visible, and meaningful.

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Super Activity for Superabilities Italy

In 2025, the Superabilities EIG hosted two important activities. In March, the “Inclusion and Safety in Diversity” event hosted two martial artists and trainers who provided effective skills in self-defense as well as personal growth and self-awareness.

In June, in celebration of World Blood Donor Day, the EIG organized “Donating Blood – The Value of Solidarity for Life” to promote blood donation. Together with AVIS (Italian association of blood donors) and the Blood Donor Group "F. Olgiati," participants learned how donating blood benefits the community.



WIN:Italy - International Day for the Elimination of Violence Against Women and Inclusive Language

In November 2025, WIN:Italy organized an event in recognition of International Day for the Elimination of Violence Against Women, focused on women empowerment. Journalist and trainer Paola Lazzarini led a discussion about women's leadership and empowerment.

That same month, WIN:Italy collaborated with Superabilities:Italy to organize the “ Language that Matters: Vulnerability and Power of Language” event, focused on promoting inclusive language. Featuring contributions from distinguished speakers including a lawyer, a law enforcement officer, and a language expert, the event explored how language can hurt, protect, bestow dignity or take it away, particularly for individuals experiencing vulnerability due to violence, emotional fragility, or disability. Language can act as a barrier, but it can also create opportunities for inclusion.

A group of 20 employees at Brightstar volunteered to join WIN:Italy and Superabilities:Italy in another inclusive language initiative,“The Compass of Language.” The project aimed to establish shared principles for clear, respectful communication aligned with corporate values, fostering a workplace based on trust, collaboration, and high-quality relationships. In late 2025, three workshops were held to define the project's core elements, with formal rollout planned for 2026.

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Safely Sharing Insights on Self-Identity

ID-Me provides an optional opportunity for employees to safely share insights about their identity, including gender (inclusive of transgender identity), sexual orientation, disability, caretaking responsibilities, and military experience. The first phase of the ID-Me program was available in the United States, United Kingdom, and Canada. ID-Me is a Company-wide initiative, designed with input from several EIGs, including Superabilities, Military, and PRIDE, who collaborated in crafting the self-identification questionnaire. Through this program, the Company provides opportunities to meet the diverse needs of its workforce, while continuing to build an inclusive environment where employees can easily seek the support and resources they need.

Quarterly Inclusive Training

In the fourth quarter of 2025, Brightstar launched Inclusion Edge, a Company-wide inclusion learning experience designed to foster everyday inclusive behaviors across the organization. This voluntary program combined three asynchronous trainings with three live trainings. Both sets of trainings focused on a distinct dimension of inclusion. The Inclusion Edge themes included:

- What Is Belonging: This module highlighted the importance of belonging as a core component of an inclusive culture. It explored how feelings of belonging impact well-being and performance and outlined practical actions employees can take to help colleagues feel welcomed and valued.
- Introduction to Voice: This microlearning emphasized creating an environment where individuals feel heard and empowered to contribute. It addressed common stereotypes related to accents and communication styles, reinforcing the value of diverse voices and perspectives in building trust and engagement.
- The Connection between Growth Mindset and Inclusion: This session introduced the concept of growth mindset and how organizations that embrace it invest in people, encourage continuous learning, and strengthen their inclusive practices. It underscores that inclusive cultures are built when teams believe that abilities can be developed and that every employee has the potential to grow.

Through Inclusion Edge, Brightstar reinforced its commitment to building a culture where all employees experience belonging, feel heard, and are empowered to grow.

Inclusive Leadership Mentorship

In 2025, Brightstar's successful, inclusive mentorship program was expanded. The program first launched in 2024 with EIG leaders serving as a pilot mentee group and leaders from across the Company serving as mentors. During the 2024 pilot program, both mentors and mentees participated in a three-part learning journey designed to deepen conversations about organizational inclusion. The program explored opportunities and challenges in advancing bias awareness and its impact on engagement, performance and talent development, while building the skills needed to foster inclusion during times of transformation. The program expanded in 2025 to welcome mentees from across the Company. Brightstar has fully scaled the program to all employees, creating an enterprise-wide opportunity for connection, development, and shared learning. The 2025 cohort featured 20 mentor–mentee matches, including a combination of returning mentors who helped shape the original program and brand-new mentors bringing fresh perspectives and experience. The continued evolution of this program reflects Brightstar's commitment to embedding inclusive leadership capabilities throughout the organization and ensuring every employee has access to meaningful development pathways.

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Brand & Culture Program

To support Brightstar's brand activation process, the Brand & Culture Program was created as a core pillar of the Brightstar Culture Project, designed to make values, identity, and behaviors tangible through learning, communication, and widespread engagement, with the goal of:

- Introducing and reinforcing the new brand identity and Company values.
- Creating a shared cultural language at a global level.
- Supporting change through learning experiences, engagement, and role modeling.

Certifications and Recognition for Inclusion and Workplace Excellence

Brightstar has been recognized by multiple external agencies and publicly demonstrating its support for key organizations:

- Disability: IN – "Best Place to Work for Disability Inclusion" U.S. (2023, 2024 and 2025) and UK (2024 and 2025)
- Top Employer Certifications: 2023, 2024, 2025 – U.S. and Italy.

Three Italian Milestones at Corporate, National, and International Levels

In 2025, following a series of audits, Brightstar in Italy received three prestigious recognitions for its commitment to equality, inclusion and women's empowerment, reflecting excellence at the corporate level, and aligned with specific national and international standards. These recognitions include:

- An "Excellent" score from The Gender Equality Assessment certification, designed by RINA and based on research carried out by Unitelma Sapienza (Università degli Studi di Roma).
- UNI/PdR 125:2022 Certification, the only Italian standard focused on gender equality that defines the issues companies must address to support women's professional growth paths while combating stereotypes and discrimination.
- ISO 30415:2021 Certification – Human Resources Management – Diversity and Inclusion, which recognizes Brightstar's commitment to fostering inclusion and diversity in the work environment.

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Equal Employment Opportunities and Non-Discrimination

Brightstar's Equal Employment Opportunity (EEO) and Non-Discrimination Policy applies to all stages of employment including, but not limited to, the application and hiring process. Brightstar provides equal employment opportunities to all employees based on qualification and merit, and prohibits discrimination on the basis of characteristics such as race, color, religion, gender, sexual orientation, gender identity or expression, pregnancy, marital status, national origin, citizenship, covered veteran status, ancestry, age, physical or mental disability, medical condition, genetic information, or any other legally protected status in accordance with applicable local, state, and federal laws. To uphold this commitment, Brightstar provides training to talent acquisition recruiters and hiring managers, and invites candidates to provide feedback through surveys conducted during and after the hiring process. To address pay equity, Brightstar in Italy plans to conduct an Equal Pay Assessment and to implement actions aligned with the requirements of Directive (EU) 2023/970, which introduces binding obligations for public and private employers regarding equal pay between men and women.

The Company has policies in place that prohibit discrimination and retaliation against individuals who, in good faith, bring forward claims of discrimination. Reports of discrimination may be made through multiple channels, including the Company's Integrity Line or through the Legal, Compliance, or People & Culture (P&C) departments. All reports of discrimination are promptly investigated by the P&C department, with support from internal and external legal counsel as needed.

To the extent reasonably possible, Brightstar also accommodates employees with disabilities. In the U.S., Brightstar adheres to the 1990 Americans with Disabilities Act (ADA), as amended. Under the ADA, employers are required to enter into a good-faith, interactive process to assess an individual's need for workplace accommodation. A "reasonable accommodation" enables an employee to perform the essential functions of their job and may result in job restructuring, a change in the use of tools and equipment, policy adjustments, or remote work arrangements. These accommodations are made provided they do not create undue hardship on the Company or pose a substantial safety risk to the employee or others. Employees in the U.S. may initiate an interactive process by submitting Brightstar's Accommodation Request Form.



Safe Ways to Report Potential Violations

Brightstar's Code of Conduct and Whistleblower Policy encourage employees to raise concerns about conduct believed to be unethical, or which are potentially in violation of Brightstar's policies, regulations, or laws. The Company has a strict policy prohibiting any form of retaliation or intimidation against individuals who raise concerns in good faith. Brightstar's Integrity Line, managed and operated by an independent third-party provider, offers access for reporting suspected or known activities, actions or behaviors that may involve unethical or unlawful conduct either by phone or through a protected online portal. Any such reports may also be submitted to Brightstar's Legal or Compliance departments by phone, mail, or email. Employees may also report or escalate their concerns through the P&C department or management. All reporting channels and investigation procedures described in the policy are designed and operated in a secure manner to preserve confidentiality.



Anti-Harassment Program

Brightstar stands firmly behind its commitment to maintaining an environment where everyone is treated with fairness, dignity, and respect. Any behavior that goes against these principles and diminishes the well-being of its employees, customers, or community is unacceptable and will not be tolerated. Brightstar encourages anyone who believes they have been subjected to harassment to come forward with the understanding that they will be protected from retaliation, and appropriate action will be taken.

All employees, including senior leaders, temporary personnel, and interns are required to complete harassment prevention training. Managers are required to complete annual or biannual anti-harassment training, provided by an external vendor, that references Brightstar's EEO and Non-Discrimination Policy and the Anti-Harassment and Non-Bullying Policy. The length, frequency, and content of the training vary based upon local regulatory requirements.

The course equips employees with the knowledge necessary to recognize the principles of respectful behaviors in the workplace and respond to or report alleged violations of the policies. This proactive and inclusive approach is designed to develop the skills needed to prevent harassment across the organization. The program includes specific content and scenarios to address harassment and bullying based on sexual orientation, gender identity, and/or gender expression.

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Fostering Women's Empowerment in Italy

Brightstar carried out two initiatives focused on women's empowerment:

- Valore D - As part of its commitment to creating a more inclusive work environment and preventing gender discrimination, Brightstar partnered once again with Valore D, an association that promotes inclusive cultures within organizations across Italy through annual training courses, workshops, and mentoring programs.
- Female Leadership - Brightstar employees were offered access to Female Leadership training, designed to strengthen women's self-awareness and managerial effectiveness. The training offered women not yet in managerial positions the opportunity to follow a generative leadership path to unlock their full potential through four main objectives: enhance awareness, support women's talent, build cohesion and integration, and accelerate cultural change within the organization.

A Safe and Inclusive Work Environment

Brightstar's organizational climate is shaped by its employees' perception of the workplace culture. These perceptions can be influenced by several factors including safety measures, inclusion practices, compensation programs, and internal communication plans. Brightstar strives to develop initiatives and programs that establish and maintain a welcoming work environment for all employees. This includes listening to employee feedback, accommodating emerging needs, and supporting key initiatives that promote well-being and engagement.

Brightstar ensures compliance with all applicable environmental health and safety regulations. It is the responsibility of all employees to adhere to Brightstar's Environmental, Health & Safety (EHS) program and comply with all relevant rules and regulations. Every employee is covered by Brightstar's Health & Safety Management System, and audits focus on identifying workplace hazards and risks, including common safety concerns such as environmental, electrical, chemical, and structural integrity, are conducted either through consultations or internal assessments.

The Safe and Healthy Work Environment Policy covers topics such as workplace violence, illegal drug and alcohol use, tobacco use, fitness for duty, and actions that should be taken if someone needs to report a violation. In the event of a workplace-related injury or illness, the Company will provide appropriate medical attention to the employee. If the injury or illness is determined to be work-related, Brightstar will comply with all applicable laws and reporting requirements, including those related to lost wages and medical expenses.

Brightstar continues to engage employees and promote health and safety through site-level safety committees. These committees raise awareness on topics relevant to each location, including emergency preparedness, injury prevention, and hazard mitigation. Health and safety training is provided to all employees globally.

ISO 45001 Certification

Brightstar in Italy retained the ISO 45001 certification, the international standard for an occupational health and safety (OH&S) management system.

The standard establishes criteria for an OH&S policy and system, including objective setting, planning, implementation, operation, auditing, and review. Key elements include leadership commitment, employee participation, hazard identification and risk assessment, legal and regulatory compliance, emergency planning, incident investigation, and continual improvement.

Brightstar self-declared the same certification in 13 locations across the U.S. and developed a new safety training, "Managing a work-related injury" for U.S. employees.

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To ensure employee safety remains a top priority, Brightstar's Field Services department works in alignment with local and federal safety regulations in North America and maintains a safe work environment through the following actions:

- Providing annual safety training to all employees.
- Performing safety equipment inspections according to local regulations in both manufacturing operations and field service, focusing on fire suppression systems, smoke and heat detectors, and automated external defibrillators.
- Performing job task assessments.
- Appointing safety leaders at each site, and at the organizational leadership level.

In 2025, identified hazards were tracked using multiple lagging indicators, including incidents (property damage and injury), near misses, inspections, audits, hazard reporting from the workforce, and other sources. These inputs resulted in assigning action items to those responsible for mitigating the hazards. As a result of implementing VelocityEHS, approximately 415 action items were identified and completed during the year using the VelocityEHS safety database. This includes findings noted in 2024 that were mitigated and closed in 2025 from incident investigations, audits, inspections, hazard identifications, and compliance requirements.

Brightstar carried out an employee health and safety risk assessment on approximately 39% of all operational sites. Risk assessments are documented in VelocityEHS, on Brightstar's ISO 14001/45001 internal site, or onsite at the operational facility.



Wellness Goes Global

Brightstar's Wellness in the Workplace microsite supports the Company's commitment to fostering a culture of wellness by highlighting important information on physical, emotional, and mental health. The content of this microsite is also intended to provide monthly updates on benefits and wellness events.



Consistent Global Health and Safety Data Collection System

VelocityEHS recognizes, records, and investigates hazards, incidents, near misses, and safety improvements in the workplace. It also acts as Brightstar's database for inspections, audits, and hazard analyses. The safety database has been implemented globally to identify hazards, assign action items to mitigate hazards, and prevent hazards from occurring in the workplace. Hazard identification and documentation include walk throughs, inspections, and audits. Employees can report hazards anonymously using the Hazard Reporting QR code, which is accessible from any mobile device or online through Brightstar's intranet.



Global Employee Assistance Program (EAP)

As part of Brightstar's commitment to employee mental health and well-being, all full-time employees and their family members are covered and have access to EAP, a Company-paid benefit that provides 24/7, confidential support for everyday challenges and more serious concerns. Each employee and their household members can access up to five counselling sessions, either in-person or over the phone. The program is delivered globally through the Optum platform and provides confidential support for concerns such as:

- Depression, anxiety, and stress.
- Substance abuse.
- Legal issues.
- Parenting and family issues.

In addition to direct support, Optum offers webinars that provide education and raise awareness about a variety of topics, such as suicide and burnout prevention. Additionally, for people managers, Optum hosts scheduled events focused on mental health issues and their impact on work performance.





Medical Prevention at Brightstar in Italy

The Occupational Health and Safety (OH&S) management system, compliant with ISO 45001 certification, provides for the dissemination of health information and prevention measures across the Company. Each year, in collaboration with the Company's occupational physician and workers' health and safety representatives, Brightstar designs health prevention campaigns for its employees. In 2025, an information-based campaign focused on proper nutrition was carried out. The initiative was delivered through interactive webinars led by a doctor specializing in nutrition and was met with a high level of participation and appreciation among employees.

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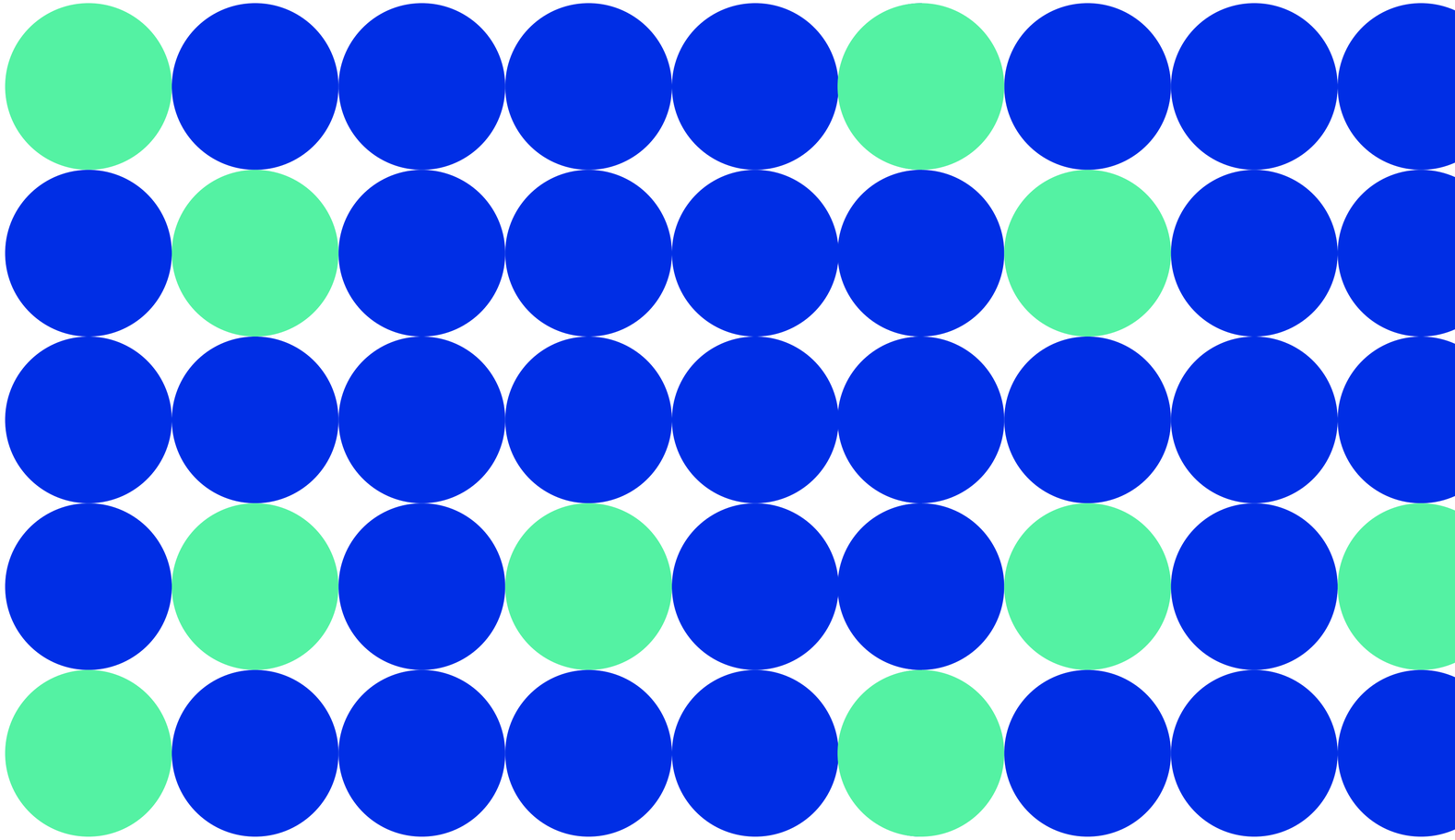
Dialogue with the Trade Unions

In line with the UN Global Compact, Brightstar recognizes the value of using dialogue and negotiation to achieve positive outcomes in employment practices. The Company respects employees' rights to associate freely with, or seek the representation of, unions. Where unions exist, Brightstar maintains a productive partnership with their representatives and members. This commitment is reinforced through various communication channels such as training sessions, employee focus groups, and in some locations, union-related information and updates posted on employee bulletin boards. The Company abides by non-discriminatory policies and procedures with respect to trade unions, union memberships, and union activities.

In certain locations, Brightstar provides workers' representatives with appropriate support to facilitate the development of effective collective agreements. The Company participates in collective bargaining in various countries and is committed to complying with local laws and regulations, providing union representatives with the resources needed to perform their duties.

For employees not covered by collective agreements, specific labor, social, and other regulations set the rules that employers must follow. Additionally, some employees have individual employment agreements that may include terms more detailed than those required by local labor laws.

As of December 31, 2025, 100% of Brightstar employees in Italy are covered by collective bargaining agreements. In locations with collective agreements, employees and their elected representatives are notified of significant changes that could substantially affect personnel, in accordance with applicable laws. For example, the statutory Italian labor contract sets minimum wages for every contract level. While the salary for new hires varies depending on the role and previous experience, they are generally higher than the minimum wages established by law and/or labor contract.



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Responsible Gaming

GRI 2-23; GRI 2-24; GRI 3-3

Brightstar maintains a long-standing commitment to player protection. This is demonstrated through close relationships with customers, regulators, research institutes, and advocacy groups that work together to address problem gambling. In addition, Brightstar supports responsible gaming organizations that provide programming for underage gambling and support for problem gambling resources. Brightstar's programs and initiatives are developed to emphasize responsible gaming in all stages of the business, from game design to customer training, and to support the quality and integrity of all products and services. Brightstar strives to earn and maintain the trust of its stakeholders worldwide through programs and solutions designed to promote fair play and compliance with responsible gaming requirements and regulations.

A Solid Approach to Supporting Responsible Gaming in Marketing Communications

Brightstar's efforts to advance responsible gaming have evolved over time to meet rising social concerns and stakeholder expectations. The Company regularly updates its Responsible Gaming Policy and Marketing and Advertising Code of Principles, which lay the foundation of the responsible gaming corporate framework and provide clear guidance to all internal parties. In early 2026, the Marketing and Advertising Code of Principles was replaced by the Responsible Marketing Policy to signify a greater commitment to enforcing responsible marketing through a broader strategy that includes a compliance process. The compliance process includes formal review by a responsible gaming team member to ensure alignment with the policy.

The Responsible Marketing Policy supports the following standards by applying their founding principles:

- World Lottery Association (WLA) Responsible Gaming Principles.
- European Lotteries (EL) Responsible Gaming Standards.
- North American Association of State and Provincial Lotteries (NASPL) Responsible Gambling Verification (RGV) Standards.
- National Council on Problem Gambling (NCPG) Internet Compliance Assessment Program (iCAP) Standards.

At Brightstar, responsible gaming refers to how the Company contributes to player protection by promoting positive play, raising awareness of responsible gaming tools, and securing third-party credibility through accreditation and research. This means creating a culture that reflects the Company's core values and encourages all players to engage in positive play behaviors.

This approach is found in product development, programs, services, and policies. Products, systems, and portals include advanced responsible gaming tools that are designed to support the protection of players' interests and address regulators' concerns.

Brightstar, together with business partners and applicable third-party vendors, aims to ensure that promotional material is clear and concise. The Company is committed to not misleading or misinforming customers about competitors' products or services. Marketing communications must adhere to contemporary standards of good taste, maintain respect for individuals by avoiding discrimination, and refrain from encouraging any behavior that is culturally unacceptable in local jurisdictions. In essence, marketing communications must:

- Emphasize the fun and entertaining aspects of engaging with lottery products and/or the public benefit derived from such play, without implying a win will change life for the better.
- Not imply or state that gambling activity will elevate or guarantee an individual's social, financial, or personal success, nor will it play into an individual's self-esteem or imply gambling will enhance their likeability or attractiveness.
- Not contain false promises or present winning as the probable outcome or imply that a chance of winning increases the longer a person plays.
- Not suggest that skill can influence the outcome of non-skill-based games.
- Not directly advertise or target underage individuals, including merchandising materials intended for use by minors, or use colorful and exaggerated animated characters that have particular appeal to minors.
- Contain responsible gaming features, convey that players must be of legal age to play, include reminders that players should play responsibly, or use appropriate prevention language.

The Company's responsible marketing initiatives support one of the UN SDGs:



Good Health and Well-Being

Ensure healthy lives and promote well-being for all, at all ages.

Responsible gaming tools are incorporated into Brightstar's products and services to help mitigate potential risks. Brightstar also works with relevant stakeholders on responsible gaming issues to support the deployment of industry practices and disseminate awareness of current research. Additionally, the Company promotes internal awareness by providing educational training to employees and supports customers with best practices to foster responsible play and promote stakeholder engagement.

As a key component of the Sustainability Plan, governance of Brightstar's responsible gaming program is overseen by the SSC. The program is managed by the Global Sustainability team under the leadership of the Senior Vice President of Branding, Communications and Sustainability, with responsible gaming objectives and progress regularly reported to the SSC.

The Global Responsible Gaming Model

With Brightstar's exclusive focus on lottery, the Company has developed a comprehensive Global Responsible Gaming Model that serves as a strategic tool to guide activities and ensure alignment with the Company's goals and its responsible gaming certifications.

Brightstar's Global Responsible Gaming Model is articulated in three strategic areas – Awareness, Protection, and Support – and supported by cross-functional activities grouped into six key activity areas (research, product development, responsible gaming tools, stakeholder engagement, communication, and education). These activities can be conducted simultaneously or separately and may refer to one or more strategic areas, depending on factors such as game design stages, game launch schedules, regulatory changes, and national or international awareness campaigns.

The three strategic areas are:

- Awareness: Introducing external and internal stakeholders to responsible gaming and risks represents the strategic foundation of an effective dissemination of responsible gaming practices. Positive Play is Brightstar's approach to education and prevention efforts for all players, which must be properly shared with customers and employees. Risk mitigation should inform any new business initiative, from game design to testing and dissemination.
- Protection: The paramount goal of responsible gaming practices is the protection of vulnerable populations, namely people who may display an increased risk of problem gambling and underage individuals. Carrying out activities designed to protect vulnerable and underage populations holds the utmost strategic importance.
- Support: Gaining the support of external stakeholders makes the difference in designing products, communications campaigns, or research that advances responsible gaming, in addition to supporting the Company's ability to achieve certifications.



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In 2025 and early 2026, Brightstar carried out numerous activities that supported these three strategic areas:

- Brightstar worked with Dr. Richard Wood, psychologist and President of GamRes Limited, to assess the Company's responsible gaming approach for digital games in Italy, reinforcing the importance of industry and research collaboration as well as ongoing dialogue between the two. Brightstar also supported the development of the new Positive Play Academy created by GamRes Limited, an internationally respected group of responsible gaming experts who provide research and consultancy services to design, implement, and evaluate responsible gaming strategy.
- Brightstar attended and presented at Corporación Iberoamericana de Loterías y Apuestas de Estado (CIBELAE) and EL seminars. Through the events, Brightstar connected with customers and partners around the world on important responsible gaming topics and shared its efforts to advance player protection.
- In January 2025, Brightstar participated in a supplier panel at NASPL's first Responsible Gaming Seminar in Atlanta, Georgia, U.S., to discuss trending topics in responsible gaming and how the Company is evolving to meet digital concerns around problem gambling.
- Brightstar participated in Problem Gambling Awareness Month (PGAM), the annual campaign led by the NCPG to increase public awareness of problem gambling and the availability of prevention, treatment, and recovery services. In March 2025, Brightstar welcomed Dr. Maris Catania, a notable gambling researcher and expert, for a special webinar titled, "Using Artificial Intelligence for Risk Detection and Intervention" in recognition of PGAM.
- In July 2025, at the NCPG's National Conference on Gambling Addiction and Responsible Gaming, Brightstar participated in the keynote panel titled, "An Enduring Partnership: How NCPG and NASPL Transformed Responsible Gaming Through Collaboration" to discuss responsible gaming certifications, their importance to lottery operators, and Brightstar's ability to assist customers with their certification goals.
- In September 2025, Brightstar held a virtual event for employees in recognition of Responsible Gaming Education Month (RGEM) with representatives from the NCPG. The panel shared insights into the NCPG's programs, including the organization's helpline, evolution of the RGV, and the annual Gift Responsibly campaign. Brightstar joined the NCPG Gift Responsibly campaign in December 2025, which reminds the public that lottery tickets are for adults of legal age to play. As a supplier, Brightstar highlighted the NCPG's message and shared its own graphic of support to raise awareness.
- Brightstar's PRIDE EIG hosted a webinar featuring an individual in recovery, who shared their journey of gambling addiction, recovery, and current work in gambling research.

Brightstar Indiana's Work on Behalf of the Hoosier Lottery

Progress was made last year across responsible gaming, player wellness, and sustainability initiatives in Indiana's a B2C environment. Highlights include:

- Responsible Gaming Recognition - Brightstar Indiana received the NCPG and NASPL RGV at the Sustaining Level, underscoring an ongoing commitment to strong responsible gaming standards. Also, Kate Carlson, Brightstar Indiana Director of Compliance and Corporate Social Responsibility, was honored with the Kentucky Council on Problem Gambling's Arch Gleason Award, recognizing her contributions to responsible gaming as an industry employee.
- Player Health Screening - During PGAM 2025, Brightstar Indiana launched a Player Health Screening based on the Brief Biosocial Gambling Screen, offering players a quick way to reflect on their play and access support resources. In total, more than 7,000 individuals completed the screening during PGAM, demonstrating strong engagement with player wellness tools.
- Responsible Gaming Campaign Reach - Brightstar Indiana garnered 13.8 million total media impressions across responsible gaming campaigns, including PGAM, RGEM, and Gift Responsibly.



An Approach to Responsible Gaming Shared at the Global Level

By adhering to international standards, such as those from the WLA and the NCPG's iCAP Ready, Brightstar follows a structured approach using the global responsible gaming model to guide strategy and activities that align with responsible gaming standards and best practices. These standards provide companies with a framework with which KPIs are developed and reported to stakeholders.

Key practices for companies adhering to the international standards include governance, employee training, responsible marketing, product design, stakeholder development, reporting, and digital tools. Third-party audits, performed by reliable assurance bodies, validate that the Company follows international standards and meets the requirements for successful certification.

WLA WORLD LOTTERY ASSOCIATION
CERTIFIED
WLA RESPONSIBLE GAMING STANDARDS FOR ASSOCIATE MEMBERS
VALID UNTIL 2027

INTERNET COMPLIANCE ASSESSMENT PROGRAM
NCPG
RESPONSIBLE GAMBLING CERTIFIED
2024 - 2026

Brightstar and Indiana Council on Problem Gambling Host Inaugural Emerging Adults Gambling Summit

In April 2025, Brightstar collaborated with the Indiana Council on Problem Gambling (ICPG) and East Carolina University's Gambling Research and Policy Initiative (GRPI), to host first Emerging Adults Gambling Summit in the U.S. The summit brought together experts, advocates, and industry stakeholders from across the U.S. and Canada to share insights and strategies focused on gambling behaviors among emerging adults.

Discussions addressed the definition of "emerging adults," associated risk factors, targeted education and awareness strategies, screening and diagnostic resources, treatment approaches, and new and existing pathways to wellness for individuals under 30. The two-day event also included development of a white paper intended to serve as a foundational resource on emerging adults and gambling-related risk. The white paper will be released in 2026.

Key contributors to the summit included Brightstar partners - the Hoosier Lottery, Indiana University's Problem Gambling Awareness Program, the Indiana Division of Mental Health and Addiction, and the GRPI.

EMERGINGADULTS GAMBLING SUMMIT

- Brightstar expanded its network of experts to include a diverse range of stakeholders across multiple areas, including individuals with lived experience and specialists in emerging technologies for risk detection, treatment, and education. This network is critical to the Company's ability to provide technical assistance and connect customers to top subject matter experts. The lottery research fund established by Brightstar, Brightstar Indiana, and Northstar New Jersey in partnership with the International Center on Responsible Gaming (ICRG) has been refreshed and renamed the Lottery Research and Innovation Program. As part of this program, ICRG and its lottery partners awarded a major grant to The University of Chicago for a project titled "Social Media, Lottery Marketing, and Gambling: An Investigation into Digital Exposure and Behavioral Outcomes Using Ethical Data Donation." This two-year study examines how exposure to lottery marketing on social media — including paid advertisements, influencer content, and user-generated posts on Facebook and Instagram — affects gambling behaviors and problem gambling risk among U.S. adults. Looking ahead, Brightstar sponsored the first lottery-focused research seminar in North America in 2026.

ICRG INTERNATIONAL CENTER FOR RESPONSIBLE GAMING

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BRIGHTSTAR



Child Protection and Underage Play Prevention

Brightstar adheres to the WLA's responsible gaming framework to develop and implement programs to protect minors. These measures include know your customer (KYC) checks, "born-by" date controls on terminals, automatic shut-off mechanisms for instant vending machines, identification card readers, employee training, and safeguards embedded within the Responsible Marketing Policy.



Employee Protection and Support in Safer Gambling

Brightstar closely monitors employee protections related to safer gambling. While only a small number of employees interact directly with gambling activities, the Company recognizes the potential for increased risk among those working in the industry. Employee conduct, including gameplay, is governed by Brightstar's Code of Conduct, adherence to which must be certified by every employee annually. Additional guidance is provided through the Employee Game Play Guidelines and Restrictions, available on the Company's intranet. For employees who do find themselves in need of support for problem gambling, Brightstar's local P&C partners can connect employees with appropriate resources in their region, including the employee assistance programs.



Advancing Responsible Gaming Tools in the Lottery Industry

Brightstar's leadership in the lottery business and long-standing commitment to advancing responsible gaming practices within the industry allows the Company to improve, address, and sometimes even respond to emerging social concerns and regulatory changes.

- Responsible gaming is woven into the fabric of Brightstar's ecosystem across all lottery channels. Embedded responsible gaming features ensure operational oversight of all system components, including transaction processing, reporting, security, retailer management, and age-verification technology.
- Brightstar's Connected Play allows for deposit limits and spending limits when purchases are made through the player's eWallet. By analyzing Connected Play use cases, Brightstar gains key insights into player behavior at retailers when activity is linked to a player's account, which helps strengthen cross-channel responsible gaming features.
- Brightstar's iLottery platform offers a wide range of player-protection tools, such as self-exclusion features, wager displays, integration with age and ID-verification systems, spending, loss, and deposit limits, reality checks and session timers on the game screen, and data protection controls. Additional individual game provider spending limits and player or operator set game exclusions are available.
- Products, games, systems, terminals, portals and mobile apps include responsible gaming tools that are designed to support the protection of players' interests and address regulators' concerns. These tools are significantly more effective when offered across every gaming channel.
- Lotteries may use Brightstar's interactive e-training to certify their retailers on responsible gaming practices.
- Operators can implement these features and functionalities to be compliant with their market rules and regulations, and to educate their players on responsible gaming practices.

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- In late 2025, Brightstar became the first lottery supplier to financially support the International Problem Gambling and Gaming Certification (IPGGC) Organization board with the expansion of programs aimed at increasing certified gambling counselors worldwide and the creation of the college level counselor certification.

- Brightstar supported Betblocker, a non-profit organization that offers players around the world a cost-free way to block gambling sites from their phones and computers. Brightstar's contribution helps keep the site free for players who choose to self-limit gambling.

- Brightstar provides global support to customers in achieving and maintaining certifications such as iCAP, RGV, EL, and WLA, at varying levels. The support ranged from research and game design tools to marketing expertise and product capabilities. In 2025, Brightstar assisted the Georgia Lottery with their iCAP certification renewal. The Company also supported Mineira Da Sorte Loteria SPE Ltda in achieving WLA Level 3 Certification in Responsible Gaming, National Lotteries Control Board (NLCB) Trinidad & Tobago in obtaining WLA Level 2 Certification, and the New Jersey Lottery in securing its WLA Level 4 Certification renewal.

- In 2025, Brightstar held board positions on the Indiana Council on Problem Gambling and RICPG. Brightstar's responsible gaming team members also served on committees or working groups for WLA, EL, NCPG, RICPG, and ICRG.

- Brightstar made financial contributions to responsible gaming organizations and events, including the ICPG, RICPG, NCPG, EASG, ICRG, and the Responsible Gaming Council.

Supporting the New Jersey Lottery in Recertification

Working on behalf of the New Jersey Lottery, Brightstar managed the WLA recertification process in 2025, ensuring that the Lottery maintained its Level 4 standing in responsible gaming. A key initiative during the year was the development of a QR code campaign directing players to the Responsible Play Quiz. This effort was also supported by a social media sweepstakes and a broader communications campaign across digital and retail channels to drive participation. In addition, Brightstar delivered in-person responsible gaming training for all lottery staff, featuring a speaker with lived experience to highlight the connection between the industry, players, and treatment resources.


CERTIFICATE
OF ACCREDITATION
Responsible Gaming Framework
This is to certify that
Northstar New Jersey Lottery Group
UNITED STATES
has met the criteria for achieving
WLA Level 4: Continuous Improvement
and has been granted accreditation by the World Lottery Association in accordance with the recommendation of the Independent Assessment Panel.
Certification date: January, 2026
This certificate is valid until: January, 2029
Andreas Kötter
WLA President
Luca Esposito Polato
WLA Executive Director

Brightstar Highlights Role of Research in Responsible Gaming at CIBELAE Seminar

Brightstar presented at the 2025 CIBELAE Sustainability and Responsible Gaming Seminar, sharing insights on the value of research partnerships in advancing responsible gaming. The presentation emphasized how research supports the Company's responsible gaming strategy, from informing player protection tools to meeting global certification standards, thereby enhancing player protection, and guiding messaging strategies.



Optimizing the Responsible Gaming Model for the Italian B2C Business

Italy's responsible gaming model builds upon the global framework while incorporating features specific to Brightstar's Italian B2C operations.

Similar to the Global Responsible Gaming Model, Italy's operational model is structured around three strategic areas, supported by cross-functional activities grouped into six clusters. The three strategic areas are:

- Awareness: Educating players both at the point of sale and online about Brightstar's Positive Play approach and the responsible gaming features embedded into its games and platforms.
- Protection: Safeguarding vulnerable populations from the risks of problem gambling is of high strategic importance, addressing growing societal expectations and concerns.
- Support: Promoting and supporting assistance to individuals affected by problem gambling, while also contributing to the broader dissemination of Positive Play messaging.

All processes within the responsible gaming program are governed by the Responsible Gaming Management business procedure.

In 2025 and early 2026, Brightstar's Italian operations carried out the following activities:

- Established a Responsible Gaming Committee to reinforce the importance of responsible gaming and strengthen its commitment to safe, informed, and sustainable gaming practices. The Committee is responsible for coordinating responsible gaming initiatives in Italy, monitoring the effectiveness of implemented actions, and advising on continuous improvement opportunities. It also fosters collaboration among relevant business functions and promotes a strong culture of responsible gaming among all stakeholders.
- Through the lottery campaign, "Il gioco è una cosa seria" ("Playing is a serious thing"), engaged stakeholders with a message that emphasizes the importance of protecting the entertainment value of play through a positive and responsible approach.
- Implemented two informational responsible gaming campaigns:
  - "Divertirsi fa parte della vita" ("Having fun is a part of life") celebrates fun and entertainment by highlighting the positive values, and spontaneity that define responsible and mindful play.
  - "Il gioco è riservato agli adulti" ("Playing is for adults only") reinforces that gambling is prohibited to minors. The campaign depicts simple, everyday situations to convey that a spirit of play can be found in daily life, highlighting that enjoyment comes from the willingness to have fun in a responsible way.
- All employees in Italy participated in mandatory interactive responsible gaming training sessions to refresh their knowledge.
  - A general training for all employees focused on responsibility and sustainability, and explained results achieved, future objectives and goals, and developments taking place in the field of responsible gaming.
  - Specialized training for specific departments focused on unique issues tailored to specific teams including in-depth, expert-developed studies.
- Provided retailers with digital training modules focused on "Prohibition of gambling for minors under 18" and "Problem gamblers." Retailers obtained a certification of attendance to be displayed at their location upon completion.
- Collaborated with East Carolina University to conduct a survey of individuals 18-25 to assess the group's behaviors as it relates to gambling. An analysis of the data will be presented later in 2026. Through these initiatives, Brightstar aims to create a research ecosystem which is not only able to inform its own information database but become a reference point for evolving responsible gaming policies based on solid scientific evidence and fostering partnerships with experts to lend validation and credibility to responsible gaming efforts.

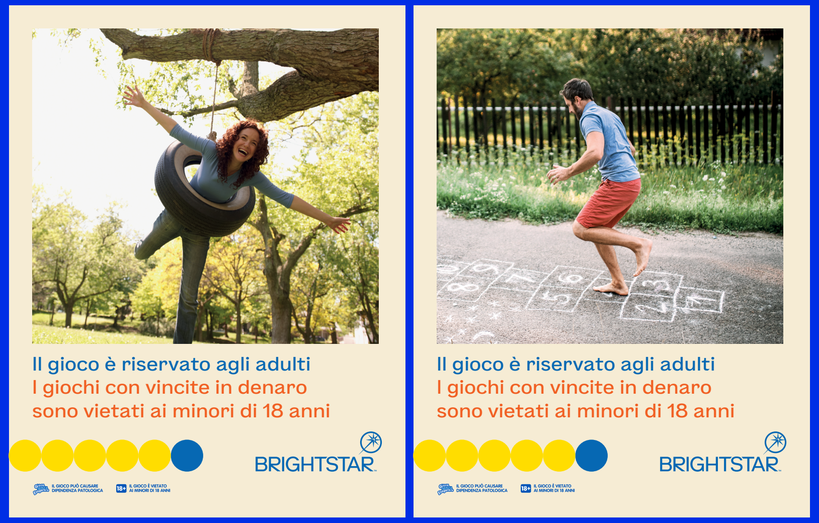
Italy Responsible Gaming Model



A Widespread Framework to Support the Protection of Minors

Brightstar's Italian responsible gaming program promotes the protection of minors through the following initiatives:

- Information campaign "Il gioco è riservato agli adulti" ("Playing is for adults only"), with messages disseminated on all touchpoints within the points of sale and available on websites, app, , and other communication channels.



- Assessment of products and marketing communications prior to launch for messages or symbols that may be attributable to childhood.
- Messaging related to the ban of gambling for minors in all points of sale and all digital channels.
- Training for retailers and employees on the ban of gambling for minors.
- Automatic ID and tax code check when registering for an online gaming account.
- Multiple age verification systems for accessing websites, PIN-restricted access, filtering software, etc.

Supporting Treatment Referral

Brightstar supports the "Gambling Online Therapy," created by the Italian Federation of Operators of Addiction Departments and Services (FeDerSerD), that provides free support to players who may develop gambling disorders and require help from experts. This service is available on www.gioca-responsabile.it and offers online treatment with different therapeutic programs, such as individual therapy and self-help groups, with a self-help manual that can be downloaded through the website.

Brightstar collaborated with FeDerSerD on the therapeutic approach of Self-and-Mutual Help Groups based on the concept of Self-Management and Recovery Training (SMART) Recovery. This treatment approach has been successfully developed in more than 30 countries and proved effective to address a series of problematic and addictive behaviors.

FeDerSerD

Certified Commitment to Responsible Gaming

The Italian responsible gaming program is aligned with leading international industry standards, including the EL Responsible Gaming Certification and WLA Responsible Gaming Framework Certification (Level 4), both achieved in 2024 for the sixth consecutive time.

Community Engagement

GRI 2-23; GRI 2-24; GRI 3-3

At Brightstar, community engagement means building long-term relationships with the communities where the Company operates by collaborating with organizations, supporting educational and social programs, and engaging with stakeholders to better understand local needs, priorities, and expectations. Brightstar recognizes that strong communities support sustainable business success and help strengthen stakeholder trust. Through ongoing dialogue and partnerships, Brightstar seeks to contribute to community development in a manner consistent with its sustainability strategy.

This commitment is reflected in Brightstar's updated Global Charitable Giving and Community Engagement Policy.

The policy specifically addresses Brightstar's sustainability strategy which supports two of the Company's three key elements of the strategy - Empowering Our People and Collaborating with Partners.

Brightstar collaborates with local organizations and supports educational programs and digital learning centers, encouraging skills development in underprivileged areas. When working with community partners, Brightstar conducts due diligence checks to ensure the organizations reflect Brightstar's corporate values, do not engage in discriminatory practices, and do not pose any reputational risk to the Company.

In addition to corporate contributions and sponsorships, Brightstar participates in a broad array of community involvement activities through the Community Ambassador program and encourages individual engagement through employee-driven programs.

Corporate-Driven Activities

Brightstar's corporate-driven activities consider the regional and cultural interests of its communities while ensuring their alignment with the Company's chosen SDGs. Community support is provided through contributions to non-profit organizations and registered charities. Organizations seeking a charitable contribution from the Company may submit a request or proposal for contribution, sponsorship, or program support through Brightstar's website. Projects supported through Brightstar's global charitable giving program are reviewed and approved by the Social Impact Committee (SIC). The SIC is comprised of senior leaders from several departments across the business who bring unique perspectives to the committee. The SIC reviews requests to ensure alignment with the Charitable Giving and Community Engagement Policy and against the Community Giving Guidelines to ensure alignment with Brightstar's core values and chosen SDGs, and monitors progress of the charitable donations while protecting the interests of the Company. The activities of the SIC are detailed in an internal operating procedure.

Brightstar's community initiatives support four of the UN SDGs:



Good Health and Well-Being

Ensure healthy lives and promote well-being for all, at all ages.



Quality Education

Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.



Decent Work and Economic Growth

Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.



Reduced Inequalities

Reduce inequality within and among countries.

Brightstar Downtown 5K Community Run

Employees and families came together in Providence, Rhode Island, U.S. for the Brightstar Downtown 5K, a celebration of wellness and local philanthropy. Team captains partnered with non-profits to channel participation into tangible community support. By rallying colleagues and neighbors, Brightstar teams turned race day into a shared moment of pride and giving.



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Full STEAM Ahead: Brightstar's After School Advantage Program

Since 1999, Brightstar has brightened the lives of young people through its flagship community initiative, the After School Advantage (ASA) program. ASA digital learning centers provide students with access to science, technology, engineering, arts, and math (STEAM) educational opportunities, helping prepare them for future academic and career success.

ASA digital learning centers are designed to offer children between the ages of five and 18 meaningful and enjoyable educational experiences. The centers aim to provide a well-organized, technology-based learning environment where children can access the technology and digital skills that shape brighter futures.

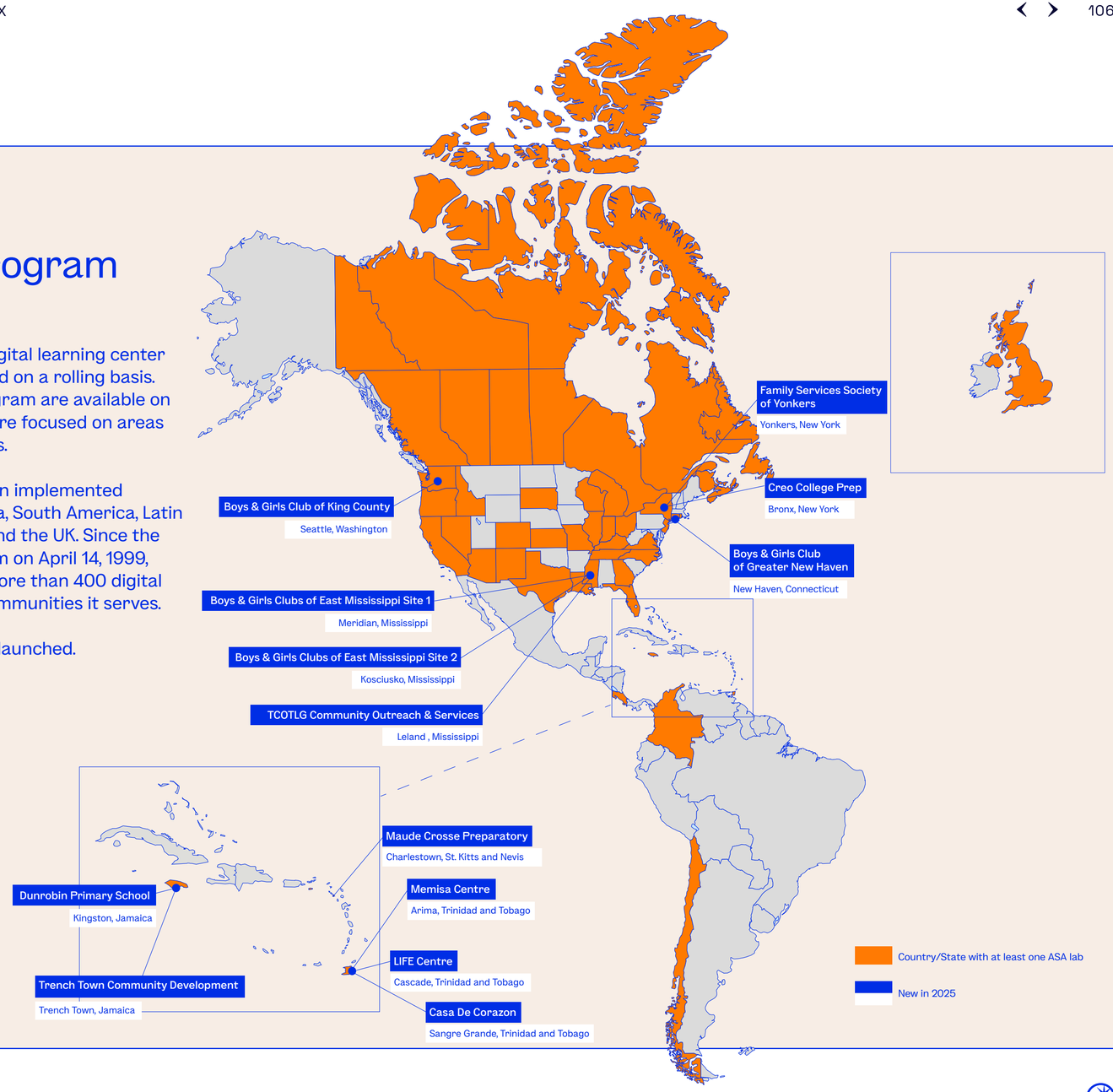
Each ASA digital learning center is completely unique, addressing the specific needs of the organization receiving the donation and the community it supports. Brightstar continuously improves the ASA program to stay aligned with STEAM subjects. The Company believes that focusing on STEAM will enhance the learning opportunities and skills of students in local communities while preparing them for future work.

After more than 25 years, the ASA program remains Brightstar's flagship community giving program.

Applications for an ASA digital learning center are accepted and reviewed on a rolling basis. Qualifications for the program are available on Brightstar's website and are focused on areas where Brightstar operates.

The ASA program has been implemented throughout North America, South America, Latin America, the Caribbean, and the UK. Since the launch of the ASA program on April 14, 1999, Brightstar has installed more than 400 digital learning centers in the communities it serves.

In 2025, 13 ASA labs were launched.



Expanding Access to Technology in the Bronx

Creo College Preparatory Charter School

Bronx, NY

In 2025, Brightstar supported Creo College Preparatory Charter School in the Bronx through the launch of a new ASA digital learning center. As part of this project, Brightstar donated iMac computers, providing students with expanded access to technology-based instruction and hands-on learning. The upgraded space provides new opportunities for exploration in science, technology, engineering, and mathematics (STEM) and strengthens the school's ability to offer meaningful after-school enrichment. By equipping learners with modern tools, the ASA initiative at Creo Prep empowers students to deepen critical skills and advance their educational journeys.



Strengthening STEM Access in East Mississippi

Oprah Winfrey Boys and Girls Club of East Mississippi

Kosciusko, MS

Brightstar partnered with the Mississippi Lottery Corporation to open a new ASA digital learning center at the Oprah Winfrey Boys and Girls Club of East Mississippi. The lab is equipped with advanced resources, expanding access to hands-on STEM learning for local youth. Members use the space for technology instruction, homework support, and tutoring, creating a supportive environment that helps students build confidence and broaden academic pathways. Through this investment, young people at the Club have the tools and opportunities they need to strengthen digital skills and pursue future success.



Enhancing Digital Learning Resources in St. Kitts and Nevis

Maude Crosse Preparatory School

Charlestown, St. Kitts and Nevis

Brightstar strengthened its support for students in the Caribbean through a major enhancement of the ASA Centre at Maude Crosse Preparatory School. The donation included new desktop computers and upgraded technology tools designed to improve connectivity and expand opportunities for digital learning. These additions provide students with increased access to modern educational resources for the development of essential digital literacy skills.



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Empowering Youth Through Drone Technology in Trench Town

Trench Town Community Development Committee

Trench Town, Jamaica

Brightstar expanded its commitment to digital education in Jamaica by supporting an innovative drone technology training initiative for youth in Trench Town. The Trench Town Community Development Committee ASA introduces young people to hands-on learning in emerging technologies, with a focus on drone operations and real-world applications. The center is equipped to support structured training sessions designed to build technical skills and spark interest in technology-driven careers.



Enhancing Learning Through Assistive Technology at the LIFE Centre

LIFE Centre

Cascade, Trinidad and Tobago

Brightstar supported a technology upgrade at the Learning Is For Everyone (LIFE) Centre in Cascade, Trinidad and Tobago, in recognition of Autism Awareness Month. The initiative provided technology including desktop computers, tablets, and assistive digital tools to enhance educational experiences for students with autism spectrum disorder. In addition to the technology donation, Brightstar partnered with a pediatric therapy organization to deliver an interactive, modified educational activity designed to promote awareness and inclusion.

Supporting Inclusive Learning and Independence at the MEMISA Centre

MEMISA Centre

Arima, Trinidad and Tobago

Brightstar supported inclusive skills development in Trinidad and Tobago through a learning technology upgrade at the MEMISA Centre in Arima. The initiative provided technology to strengthen the center's vocational and life-skills training for young adults with intellectual disabilities and included employee volunteer support to deliver and install the equipment. As one of the country's few residential facilities dedicated to adult men with intellectual disabilities, the MEMISA Centre plays a critical role in preparing members for greater independence, and the addition of new learning tools is enhancing instructional delivery and engagement.

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Brightstar Community Ambassadors

Brightstar's Community Ambassador Program is a network of global employees that plays a critical role in connecting employees with meaningful community engagement opportunities throughout the year. Community Ambassadors are the heart of community engagement and maintain close connections with local organizations by planning donation initiatives, group volunteering opportunities, and relationship building. Community Ambassadors are encouraged to consider the SDGs when planning local community events. Community Ambassadors have three primary goals:

- Improving employee knowledge of community-focused activities around the world.
- Ensuring community engagement activities are visible and well represented.
- Sharing information about Brightstar's employee giving programs with global sites.

Community Ambassadors meet monthly to share ideas, highlight local needs, and collaborate on ways to support organizations in their regions. By acting as a bridge between Brightstar and the communities in which it operates, Community Ambassadors help ensure Brightstar's outreach is responsive, inclusive, and impactful.

Community Ambassadors

Singapore – Weekend with a Heart

In Singapore, Brightstar colleagues joined "Weekend with a Heart," a Singapore Pools initiative that mobilizes volunteers and raises funds for local causes. Brightstar volunteers pitched in across family-friendly activities, strengthening relationships while powering direct support on the ground.



Rhode Island, U.S. - McAuley House – Clothing Drive

Brightstar hosted a clothing drive benefiting McAuley House, a non-profit that provides Rhode Island citizens with meals, basic needs, and supportive services. The clothing drive was held with the idea that a well-stocked closet helps McAuley House clients pursue stability and employment. By organizing donations with care and seasonality in mind, volunteers helped ensure items reached people at the right time and in the right condition.

Indiana, U.S. - Indianapolis Zoo – Animal Enrichment

At the Indianapolis Zoo, Brightstar volunteers created enrichment items including colorful paper chains and treat puzzles for the animals and learned from zoo staff about various species' needs and welfare. Brightstar's hands-on projects contributed to the daily care of the zoo's animals while deepening employee understanding of conservation.



Rhode Island, U.S. - Rhode Island Community Food Bank Box Packing

Brightstar volunteers packed shelf-stable boxes at the Rhode Island Community Food Bank destined for pantries statewide. Volunteers' efficient assembly lines helped translate donated goods into reliable meals for households across Rhode Island.

New Jersey, U.S. - Generations Family Success Center Birthday Cake Kits

Northstar New Jersey employees assembled birthday cake kits with Generations Family Success Center, which connects New Jersey families to resources that build resilience and joy. The organization believes that simple celebrations nurture belonging—especially during tight times. By packing pans, mixes, candles, and instructions, volunteering teams helped parents mark milestones with ease and dignity.



Brightstar observes several global campaigns throughout the year that provide employees with opportunities to engage with the communities where they live and work. These campaigns include Earth Month, Global Giving Month, Literacy Awareness Month, and Season of Giving. Brightstar Community Ambassadors play a crucial role in ensuring that these campaigns are well represented and adequately advertised throughout the organization.

Brightstar Celebrates Earth Month

First held on April 22, 1970, Earth Day includes a wide range of events held in more than 193 countries to raise awareness about the importance of environmental conservation and sustainability. Brightstar celebrates Earth Month, a month-long celebration of the planet and the actions taken to protect it. In 2025, Earth Month aligned with the Earth Day theme “Our Power, Our Planet.”

Boys & Girls Club of Pawtucket – Earth Day Clean-Up

Brightstar employees in Rhode Island volunteered at the Boys & Girls Club of Pawtucket for an Earth Month service project. As teams cleared litter, refreshed outdoor learning spaces, and prepared garden beds, staff shared how the Club’s after-school and summer programs give local youth a safe place to learn, play, and build confidence. By improving the grounds that host those programs, Brightstar volunteers helped create healthier spaces for outdoor lessons and recreation, which directly supports the Club’s work to inspire academic success, mentorship, and healthy development.

Virtual Speaker Event

On Earth Day, Brightstar hosted a global, virtual event that explored the evolution of sustainability at Brightstar, discussed the UN SDGs, examined Brightstar’s products through the life cycle assessment process, and highlighted innovative strategies for a more responsible future. The guest speaker was Maria Chiesa, environmental expert in designing projects for the EU’s ecological and energy transition and professor at ALTIS Università Cattolica, in Milan.



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May is Global Giving Month

Each May, Brightstar celebrates Global Giving Month, where employees engage with local non-profit associations globally to make a positive impact in their communities. In 2025, Brightstar organized several volunteering opportunities for employees.

Global Giving Month - U.S.

Rhode Island, U.S. - The Izzy Foundation – 5K

Brightstar celebrated Global Giving Month by joining The Izzy Foundation's community 5K, where employees walked and ran alongside families and supporters. On the course and at the finish, volunteers amplified the Foundation's mission to ease the burdens that families face when a child is critically ill—providing spaces, services, and practical support during treatment. The energy of the Brightstar team turned participation into presence: a visible show of solidarity that strengthens the community of care surrounding children and caregivers.



Rhode Island, U.S. - The Izzy Foundation – Capes & Masks

Through an in-person volunteer event, hosted by Goodera, Brightstar volunteers designed capes and masks that turn treatment days into moments of imagination. The event benefited the Izzy Foundation, which creates welcoming spaces and resources for families navigating pediatric illness. By pairing creativity with compassion, volunteers contributed tools that help kids feel brave and seen.



Rhode Island, U.S. - Creative Reuse Center – Donation Sorting

At the Creative Reuse Center in Providence, Brightstar volunteers sorted and prepared donated art and classroom materials for educators and nonprofits. The Creative Reuse Center advances both equity and sustainability by getting low-cost supplies into classrooms while keeping useful items out of the waste stream. By volunteering, Brightstar employees enabled teachers to spend less time sourcing materials and more time creating hands-on learning for students.

Rhode Island, U.S. - Crossroads Rhode Island – Hygiene Kits

Brightstar volunteers assembled portable hygiene kits designed with dignity and practicality in mind for Crossroads Rhode Island. Crossroads' comprehensive mission targets shelter, housing navigation, and wraparound services that help people achieve stability. By supplying everyday essentials, Brightstar teams supported that journey, helping clients focus on next steps while Crossroads advances long-term housing solutions.



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Rhode Island, U.S. - Crossroads Rhode Island – Pop-Up Shop & Meal Prep

During a pop-up shop and meal-prep event with Crossroads Rhode Island, Brightstar volunteers transformed a common area into a welcoming marketplace and kitchen, enabling clients to hand-pick clothing and essential items. Volunteers also helped prepare and serve fresh meals to Crossroads' clients.

Rhode Island, U.S. - Rhode Island Community Food Bank – Donation Sorting



At the Rhode Island Community Food Bank, Brightstar volunteers inspected, sorted, and organized donations bound for member agencies across the state. By streamlining pallets and quality-checking goods, Brightstar volunteers helped accelerate distribution so community pantries can meet demand quickly and safely.

Rhode Island, U.S. - Meeting Street School – Field Day

Brightstar volunteers supported Meeting Street School's inclusive field day, assisting adaptive play stations and cheering on students of all abilities. By helping create joyful, accessible play experiences, volunteers reinforced the school's mission to ensure every child has the opportunity to learn, grow, and thrive.



Rhode Island, U.S. - Hotel for Homeless Dogs – Beautification

At Hotel for Homeless Dogs, Brightstar volunteers organized supplies and refreshed outdoor areas where animals exercise and meet prospective adopters. Improvements created cleaner, calmer spaces to support animal wellbeing and adoption readiness, simultaneously freeing staff to focus on rehabilitation and placements.







Florida, U.S. – Polk Education Foundation – Teacher Market

At the Polk Education Foundation's Free Teacher Market, Brightstar volunteers organized classroom supplies that educators can access without out-of-pocket expense, leveling the playing field for students across the district. By readying inventory and improving flow through the market, Brightstar teams helped more classrooms start the term equipped for learning.

Rhode Island, U.S. - TeamFAME - Pathway to Success

Brightstar employees joined TeamFAME (Fitness And Mentorship for Excellence) for a Pathway to Success session, sharing career journeys and practical advice to build confidence and open doors for Providence area youth. By offering a candid question and answer session and words of encouragement, volunteers helped students connect classroom learning with real-world possibilities.



Florida, U.S. – VISTE – Senior Support

Brightstar volunteers supported Volunteers in Service to the Elderly (VISTE) by preparing and sorting goods destined for homebound seniors, helping older adults maintain health, independence, and dignity. The efforts strengthened aging in place support so neighbors can remain safely at home.



New Jersey, U.S. – Friends of Princeton Open Space – Land Stewardship

Brightstar colleagues in New Jersey joined Friends of Princeton Open Space to remove invasive plants and support trail access around preserved lands. Volunteers' fieldwork helped restore native growth and kept public pathways welcoming for all visitors.



Indiana, U.S. – Teachers' Treasures – Book Support

In Indianapolis, Brightstar volunteers organized books and penned notes of encouragement at Teachers' Treasures, a nonprofit that equips classrooms with free supplies. By streamlining shelves and prepping resources for pickup, Brightstar teams enabled teachers to focus on students rather than sourcing basic classroom necessities.

Tennessee, U.S. – Move! Music City Fun Run

In Nashville, Brightstar teammates participated in the Move! Music City Fun Run, a community event that promotes physical activity and youth wellness. By showing up in force, Brightstar employees turned a morning run into momentum for local health initiatives.

Global Giving Month in Italy

Associazione Salvamamme – Family Support

In Rome, Brightstar volunteers supported Associazione Salvamamme by organizing storage areas, preparing newborn kits, and packing suitcases for women and families in crisis. The efforts helped move critical items where they were needed most, reinforcing Salvamamme's mission to accompany families through transition with compassion and care.

CasaAmica – Garden Maintenance

At CasaAmica, Brightstar teams tended gardens and refreshed shared outdoor spaces that residents use for reflection and connection. By restoring pathways and plants, volunteers enhanced a sense of calm and belonging that supports recovery and community.

Pian Due Torri – Sports Facility Care

Brightstar employees cleaned, organized, and maintained equipment at Associazione Polisportiva Pian Due Torri, a hub for inclusive sport and youth engagement. Volunteers' practical support kept programs on schedule and ensured athletes have access to everything they need to participate fully.

Associazione KIM – Family Activities

At Associazione KIM, Brightstar volunteers joined hands-on activities with mothers and children, from creative projects to accompaniment support. By showing up with time and attention, volunteers were able to support the organization's mission to help families build trust during medical and social transitions through a personalized approach to resilience and care.

La Casetta dei Gatti – Animal Care

At La Casetta dei Gatti, Brightstar teams cleaned cat habitats and tended gardens that create soothing environments for animals and visitors, which can reduce stress and improve adoption outcomes. Their work allowed staff and foster partners to focus on socialization and placements.

Il Tetto – Facility Refresh

At Il Tetto, Brightstar volunteers cleaned common areas, organized storage, and completed light painting and gardening to make daily services more effective and welcoming. Improvements supported both clients and caregivers, enabling smoother operations in a home-like setting.

Komen Italia – The Race for the Cure Support

The Race for the Cure is the world's largest, most significant sporting event for breast cancer awareness and research, organized by Susan G. Komen Italia. It features a five kilometer run or a 10 kilometer competitive race, raising funds for breast cancer research, diagnosis, and support. Working with Komen Italia, Brightstar colleagues helped with race kit distribution, event support, logistics, and data entry. Brightstar's operational support extended the reach of Komen's prevention and education efforts while honoring those affected by breast cancer.



Sant'Egidio – Clothing and Food Sorting

Partnering with Sant'Egidio, Brightstar volunteers sorted clothing and supported food collection and distribution to those the organization serves, including seniors, migrants, and families. By moving essentials efficiently, volunteers helped Sant'Egidio meet neighbors where they are.



Amici del Besta – Skills-Based Support

Brightstar employees provided skills-based support to the Associazione Italiana Miastenia e Malattie Immunodegenerative "Amici del Besta," assisting with data processing, communications projects, and planning. By lending professional expertise, Brightstar teams helped accelerate impact for patients and families living with rare and immune-mediated conditions.

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Global Giving Month - Caribbean

St. Croix U.S. Virgin Islands – American Cancer Society – Relay for Life

In the Caribbean, Brightstar teammates participated in Relay for Life St. Croix, the American Cancer Society's signature community event honoring survivors and caregivers. Brightstar's participation added visibility and volunteer energy to a movement that sustains families through prevention, treatment, and recovery.



Trinidad and Tobago - Autistic Society of Trinidad and Tobago Activities and Gardening

Brightstar volunteers collaborated with the Autistic Society of Trinidad and Tobago (ASTT) to bake, help with gardening, and provide storytelling activities for adult members. By expanding the kitchen garden and leading creative stations, Brightstar teams reinforced ASTT's commitment to meaningful engagement and life skills.

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September is Literacy Awareness Month

Brightstar celebrates Literacy Awareness Month in September. Employees engage with local non-profits to support educational activities that raise awareness about the importance of literacy. This includes encouraging reading and writing skills for individuals of all ages, from young children to adults, and highlighting the positive impact of literacy on individuals and communities.

Rhode Island, U.S. - Books Are Wings – Book Drive and Sorting

Brightstar's Rhode Island offices partnered with Books Are Wings for a coordinated book drive and on-site volunteer effort focused on expanding classroom libraries in underserved communities. Employees collected and curated diverse, age-appropriate titles and volunteered at the organization's office to sort and quality-check thousands of children's books by age, theme, and condition. This end-to-end effort accelerated deliveries to preschools and elementary schools, helping create classrooms where access to books—and the opportunity to choose one—builds pride, confidence, and a lifelong love of reading.

Rhode Island, U.S. – Progreso Latino – ESL Kits

Brightstar volunteers assembled English as a second language (ESL) kits for Progreso Latino, pairing writing tools and organizers with bilingual career resources. The kits support learners, arming them with confidence and momentum on the path to opportunity.

Global – Classroom Central – Reading Challenge

Through a virtual, global Goodera event, Brightstar employees designed a 30-day reading challenge for Classroom Central, a nonprofit that equips students and teachers with essential supplies. The template gave classrooms an easy, encouraging way to build consistent reading habits.

Global – Save the Children – Literacy Flashcards

To benefit Save the Children through a global, virtual Goodera event, Brightstar volunteers created phonics and sight-word flashcards to support early literacy. The flashcards will help build foundational skills and confidence in young readers.





Rome, Italy - Il Tetto Book Drive

In Rome, Brightstar colleagues gathered children's books for Il Tetto, integrating family literacy into the organization's broader support services. Donations complemented Il Tetto's efforts to equip families with practical tools for growth.

Season of Giving

In December, Brightstar celebrates Season of Giving, where employees join forces with local community non-profit organizations to bring joy to families and communities.

Spain - Movember

Across Spain, Brightstar teams supported the Movember campaign, which raises awareness and funds for men's health. By rallying colleagues and sharing resources, Brightstar employees helped bring attention to care that keeps families strong.



Rhode Island, U.S. – Rhode Island Community Food Bank



Rhode Island employees supported the Rhode Island Community Food Bank through a coordinated series of education, donation, and hands-on volunteer efforts. Team members first took part in a Lunch and Learn, where Food Bank staff shared insights on local hunger trends, the role of neighborhood pantries, and pathways for deeper engagement through volunteering and advocacy. Employees then contributed through virtual and on-site food drives, before putting learning into action by packing food boxes at the Food Bank for households across the state.

Rhode Island, U.S. – Crossroads

Brightstar employees deepened their partnership with Crossroads Rhode Island through a combined Lunch and Learn and hands-on volunteer experience that connected learning with direct service. During the Lunch and Learn, Crossroads leaders shared insights on housing-first strategies, barriers to stability, and how coordinated services support transitions from shelter to permanent housing. Employees then volunteered to prepare and serve meals alongside Crossroads staff.

Rhode Island, U.S. – Toys for Tots

In Rhode Island, Brightstar employees gathered new toys for Toys for Tots, a program that works with local partners to deliver holiday gifts to children. Volunteers' collections relieved pressure on families during the holiday season, and provided bright moments for kids across the state.



Rhode Island, U.S. – Providence Public Library Excel Pathways Visit

Brightstar staff hosted Providence Public Library students for an Excel Pathways visit, demonstrating real-world applications of data skills in corporate roles. Brightstar teams showed how classroom tools translate into collaborative, problem-solving work.

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Rhode Island, U.S. – Operation Stand Down Rhode Island – Veterans' Kits

With Operation Stand Down Rhode Island, Brightstar's Military EIG assembled hygiene kits for veterans accessing housing, employment, and supportive services.



Rhode Island, U.S. and Italy – Sojourner House – Hygiene Kits

Brightstar Finance teams from Rhode Island and Italy collaborated to assemble hygiene kits for Sojourner House, which supports survivors of domestic violence and human trafficking.

Indiana, U.S. - Riley Children's Health and Ronald McDonald House Charities Toy Drive

Across multiple Brightstar locations, employees collected toys benefiting children receiving care at Riley Children's Health and families staying at Ronald McDonald House Charities of Michiana. Donations brought comfort to families navigating medical challenges.

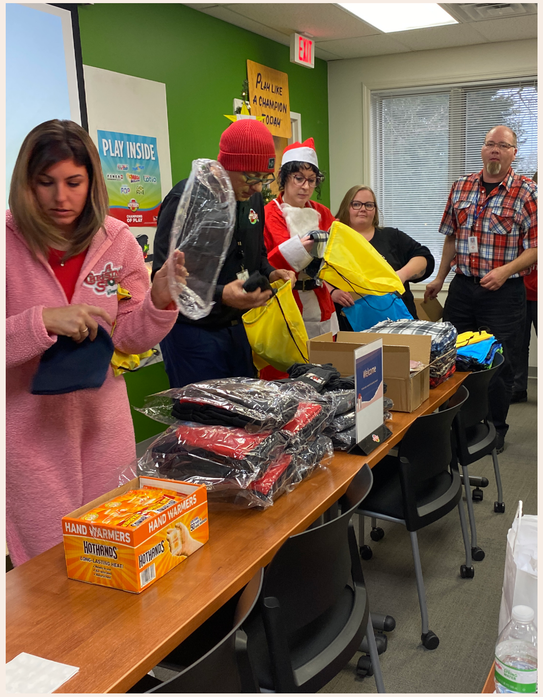
Florida, U.S. – Lakeland Toy Drive

In Lakeland, Florida, Brightstar employees participated in an annual toy drive in partnership with local agencies. Colleagues' generosity reflected a year-round commitment to neighbors, relieving budget strain for local families during the holiday season.

Indiana, U.S. – Center Township and YWCA – Winter Warmth Kits

Employees built Winter Warmth Kits for Center Township and the YWCA of North Central Indiana. The efforts helped neighbors stay safe and feel supported through the coldest months of the year.





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Community Engagement Initiatives in Italy

Brightstar in Italy considers support for local communities a strategic priority, contributing to local development initiatives aligned with sustainability objectives. The Company's commitment focuses on empowering new generations, strengthening social inclusion, and enhancing cultural and urban heritage through initiatives capable of generating positive and lasting impact.

Community-focused activities in Italy aim to:

- Develop young people's skills through training programs dedicated to digital literacy, coding, emerging technologies, and career orientation, enhancing employability and access to the professional world.
- Support social inclusion and individual well-being through socio-educational initiatives for young people and families in vulnerable conditions.
- Enhance local areas and reinforce territorial cohesion by protecting artistic, cultural, and landscape heritage, as well as promoting urban regeneration projects that integrate culture, social engagement, sports, and environmental sustainability.

Through this commitment, Brightstar in Italy seeks to reinforce its role as a responsible actor within the communities where it operates, contributing to their development and promoting long-term opportunities for growth, participation, and well-being.

Brightstar approaches brand urbanism by establishing partnerships with cities to launch and/or fund long-term urban development projects that support neglected urban areas and strengthen territorial cohesion and inclusivity.

Following the Cometa – Shine Through Service

Established in 2019, Following the Cometa is a Brightstar initiative that supports Cometa's Reality-Based Learning approach at Oliver Twist School where students attend catering, carpentry, and textile courses. The program provides step-by-step support as students prepare for their future educational or vocational goals and prevents school dropout.

Vocation-based training introduces students to work environments and the skills needed to be successful. Students also receive personalized guidance, mentorship programs, and additional training courses.

In 2025, in addition to its long-standing support for Cometa, Brightstar backed the Shine Through Service project, exclusively dedicated to 90 students from the Oliver Twist School's hospitality program. The initiative strengthened workplace-based training for students facing significant educational challenges, through technical and practical workshops and personalized tutoring and career-orientation pathways.



Since 2019, the project has supported 1,238 training and placement courses, with more than 900 hours per year of tutoring and job placement, resulting in 94% of students finding a job or continuing studies.

W La Scuola

In 2025, Brightstar supported W la Scuola, the educational program of the Sant'Egidio Community addressing school dropout and educational poverty. Brightstar's support made it possible to expand the program's presence across the territory, with activities in 25 schools in Rome and reaching 100 minors facing economic, social, and cultural vulnerability. Specifically, Brightstar's support impacted:

- Reporting and case management – An operations center coordinated reports of critical situations and activated personalized pathways for each minor.
- Field operators and mediators – Professional figures who accompanied children and families, fostering inclusion and school continuity.
- Provision of school materials – Backpacks, kits, and essential tools to ensure equal learning conditions.
- Educational activities and community-building moments – After-school programs, workshops, educational outings, and initiatives designed to strengthen motivation and create supportive learning networks.



Youth Education and Social Inclusion: AI GIRLS

The evolution of AI is generating new professions and opportunities, while also posing significant challenges in terms of equity and access to skills, specifically between genders.

Brightstar established the AI GIRLS project, a free training program on AI and creative coding, developed by Codemotion and offered to female students aged 15 to 18 from schools located in socially vulnerable areas across the country.

The initiative aims to reduce the technological gender gap by strengthening digital awareness and proficiency, and by encouraging young women to pursue educational and career paths in STEAM fields. Now in its third edition, AI GIRLS has delivered a total of 2,580 hours of training, involving 81 schools and more than 1,000 students.



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Restare per Crescere: Brightstar Invests in the Future of Italy's Local Communities

Brightstar believes that innovation and sustainable growth should be accessible to everyone. Restare per Crescere (Stay to Grow) is a free-of-charge entrepreneurship training program developed by Brightstar in collaboration with the University of L'Aquila, designed to invest in local young talent.

The course, "Create Your Local Business – from the Idea to the Business Plan" is dedicated to young people under 35 who wish to remain in their home regions and develop new entrepreneurial initiatives onsite. The project's goal is to provide theoretical knowledge and practical tools to launch a startup through four training modules hosted by university professors and industry professionals.

Stay to Grow represents a concrete contribution to countering the depopulation of villages and small towns, by supporting young people in building their future and offering them the opportunity to achieve professional fulfillment without being forced to leave their communities.



La Bottega di Quartiere

La Bottega di Quartiere (The Neighborhood Workshop) is a social enterprise project promoted by the non-profit association Amici di Edoardo and supported by Brightstar in Rome.

The project targets are young people who are not students or employed ages 17 to 29 who are experiencing social vulnerability, with the goal of providing high-quality vocational training and stable employment opportunities. Participants are guided through technical learning pathways and professional development programs designed to lead to permanent employment contracts.

In 2025, the project trained 13 young people, seven of whom have already been hired on permanent contracts.



GAMeC – Galleria d'Arte Moderna e Contemporanea in Bergamo

Brightstar supports the Gallery of Modern and Contemporary Art (GAMeC) of Bergamo, a leading institution for contemporary art in Italy, through a partnership aimed at promoting cultural initiatives with strong social value. The collaboration began with "Seasons," an exhibition project conceived by Maurizio Cattelan designed to closely dialogue with the city's identity and structure.

Alongside the exhibition, Brightstar supported a series of free guided tours, expanding opportunities for cultural engagement and encouraging public participation.



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Urban Regeneration: Dots. Connecting Ostiense in Rome

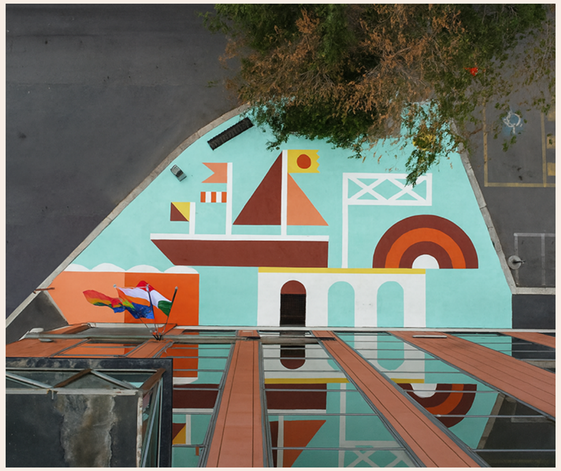
In 2025, Brightstar completed the urban regeneration project “DOTS. Connecting Ostiense.” It was launched in 2024 in Rome’s Ostiense district as an initiative that weaves together creativity, sustainability, and social inclusion.

Brightstar contributed to enhancing one of Rome’s symbolic urban areas through street and asphalt art works, created by prominent Italian artists, together with the care and valorization of urban green spaces.

After the first two works of street art were created in 2024 (the mural by Geometric Bang on Via del Porto Fluviale dedicated to working women in the Ostiense area, and Le telegrafiste by Moneyless in Via delle Conce, a tribute to the first women working as telegraph operators in Rome), the project continued in 2025 alongside Viale del Campo Boario and in Piazza Bottego. In these areas, Alice Lotti created asphalt art paintings that narrate the neighborhood through its history, landscape, architecture, and people, paying homage to the women of the Italian Resistance.







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Project Joy

In 2025, Brightstar supported non-profit organization Sport Senza Frontiere's Project Joy, which provides young people facing social and economic vulnerability with educational and relational opportunities during the summer months. The project promotes an inclusive and accessible model that integrates sports, education, and recreational activities through nature weekends, summer centers, workshops, and weekly summer camps, fostering personal and social growth within a safe and welcoming environment.

In the summer of 2025, a new and significant activity was introduced: Joy Lab – Socially Aware, a workshop dedicated to the ethical and responsible use of technology, social media, and AI.



Purple Points to Provide Safe Spaces for Women

Brightstar supports DONNEXTRADA's initiative, Punti Viola (Purple Points), which creates safe spaces for women by training retailers and their employees on gender-based violence and street safety, thus providing an immediate point of reference for anyone in difficulty.

In collaboration with the Italian Federation of Tobacconists, in 2025 Brightstar supported the activation process for tobacconists to become Punti Viola.

Brightstar and Avintave to Restore Cambodian Children's Right to Childhood

Brightstar in Italy has supported the non-profit organization Avintave since 2023. The organization's goal is to ensure Cambodian children have a brighter present and the hope of a better future. Since Brightstar began supporting the organization, more than 70,000 meals, over 45 tons of rice, and tens of thousands of snacks have been distributed, ensuring constant and tangible support to the community. In 2025, Brightstar renewed its commitment with the opening of the Arts Room, a multimedia space dedicated to creativity, offering music, theater, and dance courses to give children new ways to grow, learn, and smile.



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Employee-Driven Activities

Brightstar encourages employees to actively engage with organizations that align with the Company's Charitable Giving and Community Engagement policy. Brightstar's employee engagement programs reflect the Company's values and empower employees to give back to their local communities.

Matching Gifts

Matching Gifts is a program designed to honor the diversity of employees' charitable giving. The program allows Brightstar to match employees' individual financial contributions to qualifying charitable organizations.

Dollars for Doers

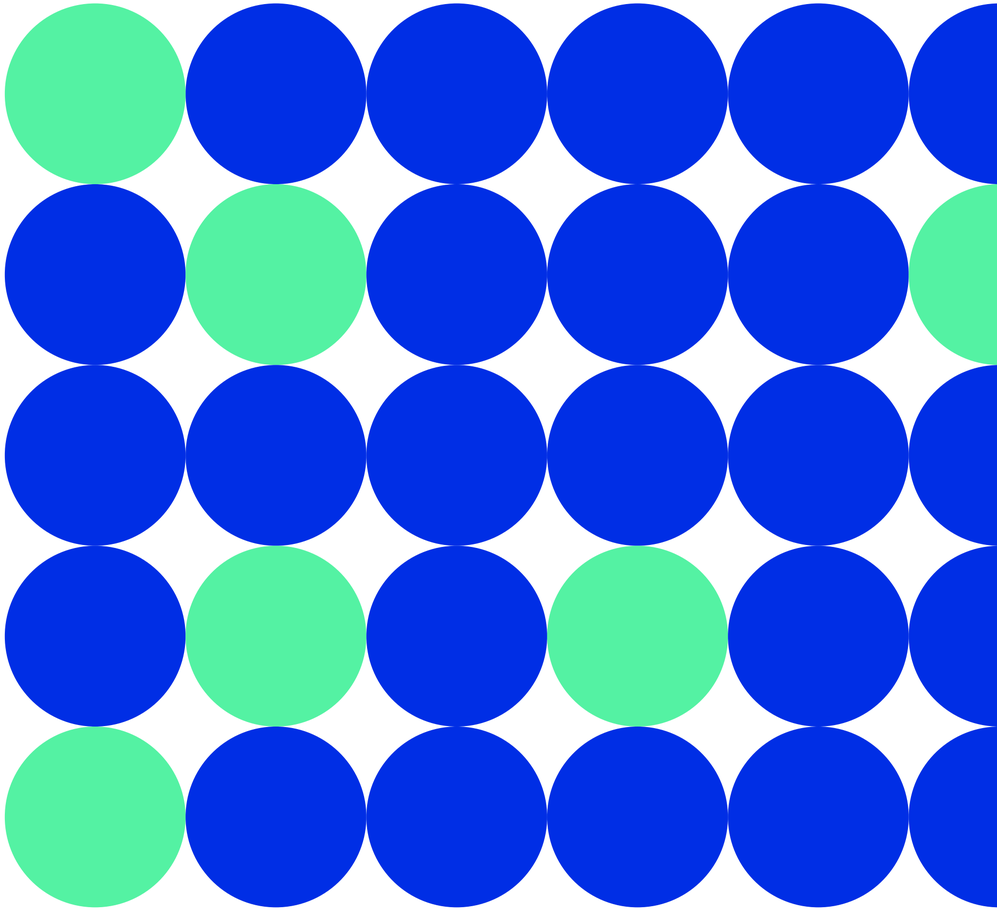
Employees with exceptional community service may apply for grants from the Brightstar Dollars for Doers Program. Dollars for Doers grants are provided when an employee volunteers 12 hours per year to a charitable organization. Team Grants are also available when five or more employees participate in an activity together.

Day Off for Volunteerism

Brightstar's global Day Off for Volunteerism program encourages employees to use one paid workday to volunteer at a nonprofit organization of their choice. Organizations are generally eligible if they are a qualified non-profit organization, tax-exempt entity, or registered charity. Volunteer time-off does not cover organizations that are political or controversial in nature, nor any institution that may be deemed as a conflict of interest.

Community Champion Grants

Brightstar's Community Champion program allows full-time Brightstar employees, who hold a Board or other leadership position with a qualifying nonprofit organization and demonstrate a personal commitment to the organization, to apply for a Community Champion grant. Grants are awarded by the SIC and recipient organizations must align with Brightstar's funding priorities.



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Amplifying Support for Blood Cancer Research

Cara Greene, an IT Asset Management Analyst I, expanded the impact of her charitable efforts by utilizing Brightstar's Matching Gifts program to support Blood Cancer United. As a fundraising team captain for the organization's Visionaries of the Year campaign, Cara not only doubled her own contributions through the program but also encouraged colleagues to do the same. By actively promoting the matching gifts opportunity within her network, she helped generate additional support for the cause, showcasing how employee advocacy and Company-supported giving programs can significantly amplify community impact.



Supporting Cultural Preservation Through Volunteerism

Nareg Mkrtschjan, Mechanical Engineer III, participated in the Dollars for Doers program, volunteering more than 12 hours with the Armenian Cultural Association of America (ACAA). Supporting his local Rhode Island branch, Nareg contributed to hosting cultural events, providing manpower during community programs, and assisting with year-round administrative needs such as email outreach and public relations. His efforts help advance the ACAA's mission to preserve Armenian culture, strengthen community ties, and promote educational initiatives within the Armenian American community.



Nick Mota Champions Youth Leadership Through Community Engagement

Nick Mota, Financial Analyst III, leveraged the Community Champion Grant Program to support Youth in Action (YIA), a Rhode Island nonprofit that elevates youth voices and leadership. As a newly appointed Board member, Nick contributes to this organization distinguished by its co-governance model, where young people hold 50% of Board seats and play active roles in shaping programming and organizational priorities. Through his service, Nick helps advance YIA's mission and reinforces Brightstar's commitment to supporting organizations that center on equity, youth empowerment, and community driven impact.



Supporting Housing and Essential Needs Through Employee Volunteerism

Brightstar employees in Lakeland, Florida demonstrated the power of collective service through a Dollars for Doers Team Grant that supported local organization, One More Child, which works to provide stability for single mothers and their children. Employees contributed directly to the organization's ongoing project to build on-site housing, helping advance a critical initiative designed to create a safe, supportive living environment for families. In addition to assisting with the housing effort, the volunteer team participated in sorting and preparing donated materials for the organization's community store, where individuals in need can access food, clothing, diapers, and essential household items.



Creating Confidence, One Dress at a Time

Laura Turner, a Pre Sales Manager, uses her Day Off for Volunteerism to support Cinderella's Closet, a local nonprofit that helps high school juniors and seniors prepare for prom by providing dresses, shoes, jewelry, and accessories. Laura has volunteered with the organization for more than 10 years in the role of a "Fairy Godmother," working directly with students to help them choose and style their prom outfits.

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Community Accomplishments in 2025

Individual Volunteer Days Off equaled **2,115 hours**

An estimated **1,050** employees volunteered across 48 global events in 10 different states/countries

Matching Gifts donations made to **95** charitable organizations around the globe

Supported **15** new charitable events through the Community Request Program

Dollars for Doers Team Events equaled **41** participating employees

SustainablePlay™
Empowering Collaborating Preserving

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BRIGHTSTAR

Sustainable Procurement

GRI 2-6; GRI 2-23; GRI 2-24; GRI 403-7; GRI 408-1; GRI 409-1; GRI 3-3

The supply chain is critical to Brightstar's operations. The Company works with customers and suppliers to promote transparency, sustainability objectives, and ethical business practices in a vast and often complex supply chain, consisting of a variety of vendors and suppliers.

Brightstar's Sustainable Procurement Policy establishes guiding principles for responsible procurement that aims to integrate sustainability considerations across the Company's supply chain.

The Policy is a tool through which Brightstar's sustainability strategy is outlined. In particular, this policy is linked to the sustainable procurement sphere of impact from Brightstar's Sustainability Strategy and supports two of the three key elements of the Sustainability Strategy - Collaborating with Partners and Preserving the Planet.

Brightstar operates in a highly regulated and controlled environment. Its direct supply chain consists of materials purchased for Brightstar in its own product manufacturing and assembling process, and follows procedures established by the International Organization for Standardization (ISO). Its indirect supply chain includes third-party, off-the-shelf products used in Brightstar's customer solutions and internal business infrastructure.

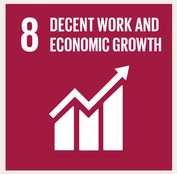
In 2025, Brightstar paid approximately $1.55 billion, to around 5,000 suppliers, mainly located in Italy, the U.S., Mexico, Dominican Republic, Trinidad and Tobago, Canada, Poland, United Kingdom, India, and Germany.

Brightstar's sustainable procurement initiatives support four of the UN SDGs:



Affordable and clean energy

Ensure access to affordable, reliable, sustainable and modern energy for all.



Decent work and economic growth

Promote inclusive and sustainable economic growth



Responsible consumption and production

Ensure sustainable consumption patterns.



Climate action

Take urgent action to combat climate change ad its impacts.

Main Suppliers KPIs	Global[1]	Italian Operations
Suppliers (Tier-1)[2]	4,332	713
Total Supplier expense amount	**$ 1,3 B**	**€ 262 M**
Significant suppliers (Tier-1)	55	112
Significant suppliers expense amount (%)	20	86
Local suppliers (%)	N/A	92%

1 Data excluding Italian Operations.
2 For the purposes of this report, Tier 1 suppliers are defined as those with whom Brightstar has a direct purchasing relationship, and who supply products or services that are integral to Brightstar's operations.

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The primary goal of Brightstar's sustainable procurement program is to purchase products and services that are aligned with human rights, environmental, and energy efficiency criteria, where applicable. Through the Policy, Brightstar aims to support the transition toward more sustainable operations by:

- Upholding laws and regulations across the jurisdictions in which it operates.
- Advocating for economic, social, ethical, and environmental practices.
- Mitigating risks associated with its procurement process.
- Raising awareness and communicating the policy with its suppliers and other stakeholders.

Sound business relations with suppliers are essential to maintaining the uninterrupted flow of quality goods and services. Suppliers play a key role in Brightstar's ability to support customers' requirements, and are instrumental in achieving customer satisfaction. Brightstar consistently aims to improve and strengthen relationships with suppliers who are committed to quality and continuous improvement.

Brightstar aims to ensure suppliers throughout its supply chain conduct business with integrity and comply with all laws and regulations. Brightstar is committed to ensuring responsible management of supplier relationships and timely, equitable payment terms.

When engaging suppliers, Brightstar employees are required to refer to the guidelines outlined in Brightstar's Supplier Code of Conduct, which covers global trade, antitrust, whistleblower protections, compliance with global anti-corruption laws, compliance with global anti-tax evasion laws, media, business courtesies, conflicts of interest, insider trading, and business continuity.

The Supplier Code of Conduct is regularly updated to address issues such as modern slavery and conflict minerals in procuring materials for manufacturing products. Recognizing the supply chain's strategic importance to its reputation, Brightstar has incorporated specific requirements into the supplier selection process, ensuring compliance with relevant domestic and international regulations.

Brightstar maintains contractual standards prohibiting forced labor, including requirements for suppliers to uphold voluntary employment, provide freedom of movement, avoid debt-bondage practices, and maintain transparent employment records.

Selection Process for Vendors

Brightstar's supply chain management is designed to support every element of the global lottery ecosystem, from the development of core technologies to the delivery of lottery products and services in markets around the world.

As part of onboarding, every supplier is required to acknowledge and agree to Brightstar's Supplier Code of Conduct. Suppliers are also required to complete Brightstar's sustainability and compliance questionnaires, which assess areas such as labor practices, workplace conditions, environmental management, regulatory compliance, and any history of violations or legal proceedings. Responses are reviewed by Brightstar's Procurement, Legal, Compliance, and Sustainability teams to identify potential red flags or inconsistencies.

In 2025, Brightstar strengthened its supplier oversight capabilities through the expansion of its Quality function, including the addition of a dedicated Supplier Quality Engineer to support audit readiness and supplier performance monitoring. In 2026, the Company will further enhance its supplier assurance framework by introducing third-party audit support and expanding on-site assessments for strategic and at-risk suppliers, enabling more consistent, independent, and comprehensive evaluation of supplier compliance, quality, and sustainability standards. In 2025, on-site visits were conducted globally and within the U.S. by members of Brightstar management at the top suppliers.

Direct material suppliers are subject to periodic inspections and visits by members of Brightstar's Supplier Management and/or Quality Engineering team based on their performance, the quality of their programs, and the updating of relevant certifications. Preferred suppliers must possess ISO quality certifications. Brightstar requires all direct material suppliers to comply with the European Union Directive on the restriction of certain hazardous substances in electrical and electronic equipment (RoHS) (2015/863/EU) (RoHS 3).



Supplier Expectations

Brightstar's Supplier Code of Conduct details its expectations regarding workplace standards and business practices of its suppliers, together with their affiliates and subcontractors. The expectations contained in the Supplier Code of Conduct are essential to Brightstar's decision to enter into or extend existing business relationships. Brightstar requires its suppliers to acknowledge and share its commitment to promoting and respecting human rights and equal opportunity in the workplace.

Suppliers are restricted from, amongst other things, exploiting children and young workers, and participating in, or benefiting from, any form of forced labor. Suppliers are also required to promptly inform Brightstar of any potential violation of the code. In the event of an actual violation, the concerned supplier, committed to correcting the non-compliance within due time, will develop a remediation plan jointly with Brightstar. Breaches of the Supplier Code of Conduct may lead to termination of the supply agreement, especially where severe or repeated. All suppliers are required to formally acknowledge and agree to the Supplier Code of Conduct as a mandatory step in Brightstar's procure-to-pay onboarding process, ensuring alignment with standards on ethics, human rights, labor practices, and environmental responsibility. During 2025, every new supplier signed the Supplier Code of Conduct.

Major Original Equipment Manufacturers (OEM) suppliers that provide direct materials are audited based on their performance in the areas of cost, quality, capability, capacity, and delivery, along with their compliance with social and environmental responsibility rules.

Brightstar expects suppliers to effectively assess, select, develop, and monitor their material sources and sub-contractors. Suppliers must have process controls to effectively comply with regulatory, jurisdictional, and environmental policies and regulations.

Prospective suppliers are expected to meet established requirements as part of Brightstar's onboarding and sourcing partner evaluation process. Suppliers must complete and comply with onboarding processes within the procure-to-pay (P2P) system, including submission of required documentation and certifications prior to conducting business. The use of local, small, and disadvantaged businesses, including minority- and woman-owned enterprises, is considered in sourcing decisions.

Suppliers are also expected to maintain ongoing compliance through periodic due diligence reviews and promptly implement any required updates, corrective actions, or recommended changes, while keeping information current within the P2P system.

Brightstar is dedicated to continuously advancing its sustainable procurement processes by assessing the Company's overall carbon footprint and evaluating key social aspects that significantly contribute to sustainable procurement.

Brightstar is committed to requesting new suppliers to submit the non-mandatory ESG Supplier Questionnaire, which measures sustainability performance and assesses the ability to enhance Brightstar's sustainable procurement program. In the coming year, Brightstar will automate this process alongside the P2P system in order to deliver a higher response rate. This questionnaire consists of 11 areas: Sustainability Management, Business Ethics, Social and Inclusive Supply Chain, Environmental Management, Energy and Emissions, Waste and Water Management, Distribution Management, Human Rights, ISO and Other Certifications, Sustainability Rankings and Ratings, and Health and Safety.

Consequently, suppliers will be covered by contractual agreements that incorporate Brightstar's mandatory environmental, labor, and human rights clauses. This ensures that suppliers are formally committed to upholding the Company's responsible business standards and aligning their operations with established ethical, social, and environmental expectations.

These contractual provisions are developed and implemented in close collaboration with Brightstar's Legal, Compliance, and Enterprise Risk Management functions. This ensures alignment with internal sustainability requirements while strengthening regulatory compliance, mitigating potential risks, and supporting the Company's broader enterprise risk management framework.

All new business partners are required to adhere to Brightstar's anti-corruption expectations through contractual clauses that mandate full compliance with all applicable global anti-corruption laws, as well as Brightstar's Supplier Code of Conduct. Brightstar's standard terms of business also require partners to confirm that neither they, nor their owners or representatives, have recent violations or ongoing investigations related to anti-corruption. They also must disclose any requests, inquiries, or circumstances that may indicate potential non-compliance of global anti-corruption laws and Brightstar's Supplier Code of Conduct, which may be amended from time to time.

Beginning in 2026, Brightstar will further reinforce its geographic and supplier-level monitoring capabilities through the global rollout of the SAP Ariba Supplier Risk module and the integration of Moody's sustainability and risk evaluations. Implementing these tools on a global scale will provide deeper, data-driven insights into country-specific labor risks, regulatory environments, and supplier practices. This enhanced visibility will support earlier detection of potential concerns and strengthen a proactive approach to responsible sourcing. Brightstar will continue leveraging these expanded global capabilities as part of the annual review cycle to ensure that any emerging geographic or supplier-related risks are identified and addressed promptly.



Supplier Diversity Commitment

Brightstar is committed to fostering an inclusive, responsible, and sustainable supply chain through relationships with certified diverse suppliers, consistent with the Supplier Code of Conduct, Supplier Diversity Commitment Letter, and corporate values. The Company promotes equal opportunity in procurement, partnering with businesses that are at least 51% owned, controlled, and operated by underrepresented groups, and supporting compliance with all applicable laws and regulations.

Aligned with the Sustainable Procurement Policy, Brightstar integrates sustainability considerations into sourcing practices, selecting suppliers that demonstrate strong ethical standards, respect for human rights, and environmental stewardship.

Through this supplier diversity commitment, the Company aims to expand access to opportunities for diverse suppliers, support local economies, and contribute to inclusive and sustainable economic growth. Through this, Brightstar encourages the broader supplier base to advance similar diversity and responsible sourcing initiatives across the value chain.

The primary goals of Brightstar's supplier diversity commitment are to:

- Provide opportunities to diverse suppliers that satisfy the Company's procurement and contractual standards.
- Actively and routinely source qualified diverse suppliers that can provide competitive and high-quality products and services.
- Encourage strategic suppliers that do not qualify as a diverse supplier to commit to and support their own supplier diversity initiatives.

Implementation of ISO 20400 in Italy

Brightstar's sustainable procurement process in Italy is inspired by the ISO 20400 standard, which provides a framework for integrating sustainability into an organization's procurement processes and supply chain. In 2025, Brightstar conducted a gap analysis on the implementation of the ISO 20400-inspired sustainable procurement process. Brightstar's procurement department collaborates with the quality engineering department to monitor suppliers' quality and quantity metrics. Whenever possible, a commodity management team member will visit strategic suppliers to review commercial and quality issues.

Appraisal Process for Potential Suppliers in Italy

Potential suppliers who are not certified under SA8000 – Social Accountability International standard- undergo a comprehensive questionnaire process. The questionnaire includes the supplier's stance on child labor, forced labor, freedom of association, discrimination, health and safety, and migrant worker practices. The results inform Brightstar's supplier onboarding process, ensuring areas of greater potential exposure are identified and evaluated for risk leveraging the Moody's Global Risk Evaluation service. Moody's Compliance Catalyst is a data-driven risk assessment platform that combines entity data, due diligence screening, and analytical models to evaluate reputational, financial, and ESG risks, enabling informed and auditable risk decisions.

In 2025, Brightstar continued to strengthen and diversify its supply base, successfully onboarding 1,147 new suppliers throughout the year. This expansion reflects both the evolving operational needs and the commitment to partnering with vendors that meet the Company's standards for quality, compliance, and responsible business conduct. Each new supplier underwent Brightstar's established onboarding process, which includes reviews of financial stability, operational capabilities, and alignment with environmental, labor, and human rights expectations.

Environmental Assessment of Suppliers

Brightstar has established procedures across engineering, materials, quality, logistics, customer service, and supplier management to support compliance of the products it designs and manufactures with applicable environmental regulations in the jurisdictions where they are delivered. These procedures include measures to assess and address regulatory requirements and support the ongoing alignment of products with applicable environmental standards.

Brightstar understands that improving its procurement processes is a continuous journey and recognizes the efforts suppliers take to contribute toward a more sustainable future. Brightstar expects suppliers to uphold high environmental standards, in line with Brightstar's Environmental Policy and Product Responsibility Policy. Specifically, suppliers are expected to:

- Adhere to environmental laws and regulations in all respective jurisdictions.
- Engage with suppliers that adhere to international standards such as ISO 14001, if applicable.
- Contribute to the environmental objectives set out in Brightstar's Environmental Policy by supporting the reduction of:
  - waste generation and enhancing recycling through the adoption of circular economy practices and lower-impact materials;
  - the use of hazardous substances;
  - greenhouse gas emissions and other pollutants with adverse environmental impacts.

Brightstar conducts various onsite environmental assessments with its suppliers, tailoring the level of attention based on its risk level and regulatory environment of their geographical location. Suppliers in low-risk or highly regulated areas receive minimal attention, whereas those in high-risk areas or with ambiguous regulations undergo more rigorous assessments. When visiting suppliers in high-risk areas, members of Brightstar's supply management team will conduct informal observations to assess environmental conditions, and, where relevant, ensure that appropriate licenses from the local authorities are in place. Special attention is paid to waste management procedures from industrial processes that create hazardous solid waste, including the chroming, plating, and painting processes. Preventative maintenance procedures and schedules are evaluated to ensure that hazardous liquid containment is included.

Any observable exceptions to standards are communicated and promptly discussed with the supplier to ensure corrective actions are taken. These exceptions are noted in the supplier visit report and shared with stakeholders of Quality Engineering for further follow-up. All environmental audits are conducted informally and in good faith with the supplier, meaning no formal reports are distributed.

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Brightstar is committed to implementing corrective actions in cases where suppliers are non-compliant with existing environmental requirements. These actions may include third-party on-site audits, if deemed necessary. The Company retains the right to utilize alternate suppliers if an existing supplier is unwilling or unable to comply with such policies.

Within its supplier environmental assessment framework, Brightstar integrates compliance considerations related to key EU regulatory developments, including the Carbon Border Adjustment Mechanism (CBAM) and the Packaging and Packaging Waste Regulation (PPWR).

CBAM introduces specific monitoring and reporting obligations for imports of selected carbon-intensive goods, requiring enhanced transparency on embedded emissions and closer engagement with suppliers. In parallel, the PPWR strengthens requirements related to responsible packaging management and packaging waste, introducing obligations on packaging design, recyclability, reduction of hazardous substances, and minimum recycled content. These requirements are expected to directly influence suppliers' processes, documentation, and material choices, reinforcing the need for greater transparency and traceability across the value chain. As these regulations go into effect, Brightstar is enhancing its supplier engagement and oversight mechanisms to promote alignment with evolving regulatory expectations. These developments are expected to further shape supplier requirements and data collection processes in the coming years. Further details on Brightstar's approach and initiatives are provided in the "Climate Action, Biodiversity, and Circularity" section of this report.

Human Rights in Supply Chain Management

As part of its Sustainability Plan, Brightstar has established targets that include the promotion of human rights in its operations. The Company regularly reviews its suppliers' environmental and social exposures, including but not limited to slavery and human trafficking, minimum working age standards, fair wages, freedom of association, forced labor, diversity, discrimination, and harassment, with this review undertaken either on-site or virtually.

Brightstar expects suppliers to adhere to all applicable laws. Brightstar recognizes that its activities impact the communities in which it operates. All Brightstar employees are expected to be good partners by actively engaging in communication with stakeholders and undertaking efforts to contribute to local development.

Brightstar is committed to fostering a decent work environment across its value chain. The Company aims to guarantee secure employment, fair and adequate wages, and encourages open dialogue. In addition, Brightstar respects freedom of association and supports unions, consultation and participation rights, and collective bargaining to strengthen employee representation. These principles reflect Brightstar's dedication to protecting and empowering workers throughout its value chain, ensuring dignity, fairness, and respect in all business relationships.

Suppliers are expected to implement appropriate measures to maintain a health and safety work environment. Brightstar promotes non-discrimination and inclusivity throughout its value chain, encouraging fair and respectful treatment of workers, and fostering equal opportunities for all individuals involved in the supply chain.

Based on current due-diligence processes, and available information, Brightstar has not identified any operations or suppliers with significant risk for incidents of child labor. The Company continues to monitor the supply chain through ongoing screening, annual reviews, and established risk management practices to ensure any emerging risks are identified and addressed promptly.



Preventing and Addressing Child Labor Risks Across Operations and the Supply Chain

In 2025, Brightstar implemented and strengthened the following measures to support efforts toward the abolition of child labor across its operations and supply chain.

- Policy and Governance - Reaffirmed the Supplier Code of Conduct and Human Rights Policy prohibiting child labor, aligned with ILO conventions and applicable laws.
- Risk Screening and Due Diligence - Conducted annual risk screening of suppliers using sector, country, and product risk indicators.
- Supplier Engagement and Capability Building - Issued targeted communications to suppliers reiterating expectations, minimum standards, and reporting channels for concerns via an annual ESG questionnaire and supplier engagement process.
- Monitoring and Verification - Performed reviews of supplier policies and attestations in prioritized categories and geographies during onboarding and alongside Brightstar's compliance and risk management leads.
- Remediation and Grievance Mechanisms - Maintained a confidential grievance channel accessible to employees, suppliers, and third parties.
- Data, Tools, and Continuous Improvement - Consolidated a single global supplier list to remove duplication and focus attention where it matters most; this list is reviewed annually.
- Transparency and KPIs - Tracked and reviewed supplier policy attestations, coverage of risk screening in prioritized categories, completion rates for relevant training, and the number of issues raised and resolved.

No child labor incidents and no significant child labor risks were identified through Brightstar's due diligence and monitoring activities in 2025.

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In 2025, Brightstar carried out the Human Rights Risk Assessment for the 2024 calendar year by integrating human rights considerations into broader sustainability strategies, helping align with emerging global regulations, investor expectations, and stakeholder demands.
In 2026, the Company will complete a human rights supply chain review using external validation tools as part of its due diligence process. On an annual basis, the Company completes an internal human rights due diligence workbook to anticipate process changes and identify emerging human rights risks for the coming year. Additionally, the Company has established a new framework to regularly review and update its formal Human Rights Risk Assessment on a biennial basis.

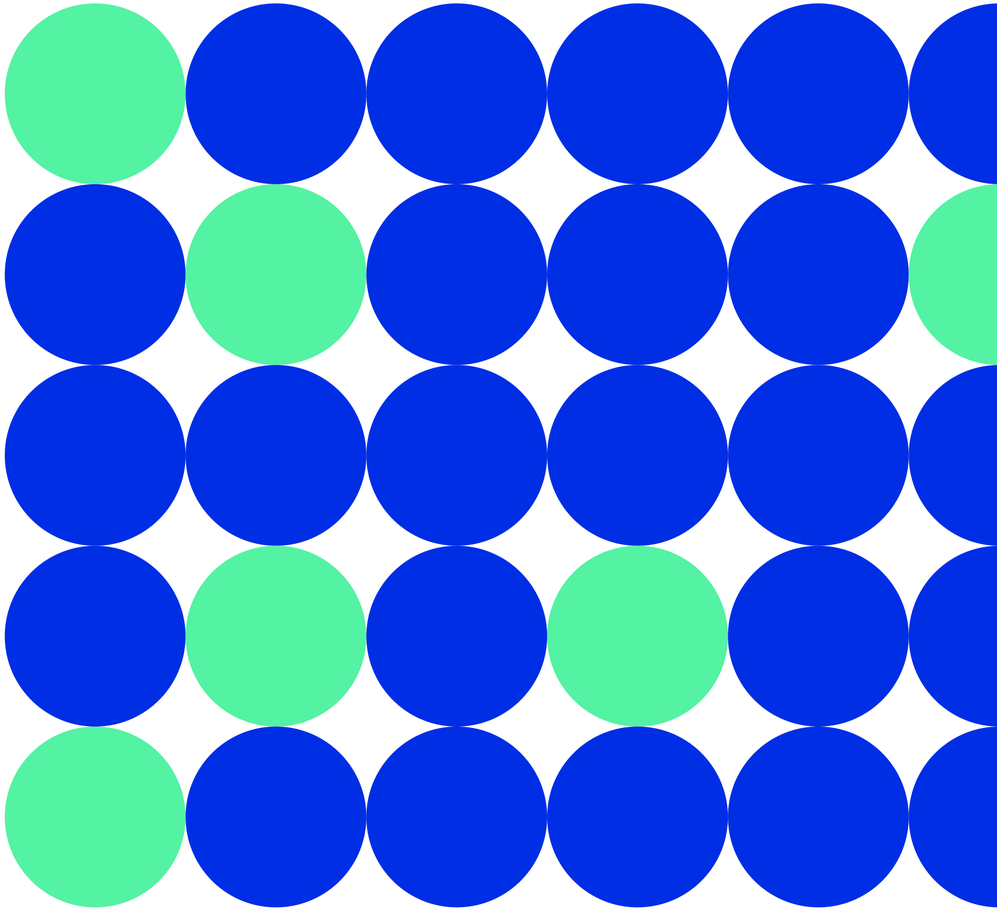
The approach follows internationally recognized frameworks such as the UN Guiding Principles on Business and Human Rights. These frameworks provide end-to-end processes including identifying and assessing actual and potential human rights impacts, integrating findings into procurement and risk management processes, strengthening internal governance, and supporting transparent disclosure aligned with modern slavery laws and due diligence directives.

Based on its risk assessment and due diligence activities, Brightstar did not identify any operations or suppliers at significant risk of forced or compulsory labor in 2025. The corporate risk assessment explicitly considers geographic exposure using recognized international sources including the ILO supervisory reports and synthesis research, OECD due diligence guidance, and government advisories.

Beginning in 2026, Brightstar's Quality Engineering Department intends to conduct comprehensive on-site audits for strategic and/or at-risk suppliers on an annual basis to ensure consistent oversight, alignment with regulatory and internal standards, and continuous improvement across all operational areas. These audits will follow a standardized evaluation protocol, including a review of quality systems, supplier performance, product compliance, and corrective action effectiveness.

Although Brightstar does not rely on cotton, apparel, or polysilicon, the Company treats any potential exposure to the Xinjiang Uyghur Autonomous Region (XUAR), China (direct or indirect) as high-risk in supplier reviews and sourcing decisions.

The Company applies heightened due diligence to geographies flagged by the ILO/OECD and government enforcement including the Uyghur Region/Xinjiang under Uyghur Labor Prevention Act (UFLPA) and requires trace to source documentation from suppliers operating in or sourcing from any high-risk areas. In 2026, with the enhancements to SAP Ariba and Moody's Analytics, this evaluation process will become further refined with external validation methods.



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Responsible Sourcing of Minerals

Brightstar recognizes that the use of gold, tin, tantalum, and tungsten (3TG) are necessary components in manufacturing certain Covered Products[1] manufactured by the Company. While Brightstar relies on various third-party vendors and suppliers, the Company aims to ensure that any 3TG, or any Conflict Minerals[2], contained within its Covered Products that originate from the Democratic Republic of the Congo (DRC) or adjoining countries (including Angola, Burundi, Central African Republic, Congo Republic, Rwanda, South Sudan, Tanzania, Uganda, and Zambia - together, the Covered Countries) are DRC conflict-free, meaning that such Covered Products do not contain conflict minerals whose proceeds directly or indirectly finance or benefit armed groups in any of these Covered Countries.

In line with this commitment, Brightstar has adopted a specific Conflict Minerals Policy, which is positioned within the Company's sustainability strategy, alongside the Sustainable Procurement Policy, reinforcing its approach to responsible sourcing.

Under the rules of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank), as implemented by the U.S. Securities and Exchange Commission (SEC) under Rule 13p-1 (the Rule) and Form SD under the Securities Exchange Act of 1934, publicly traded companies that manufacture or contract to manufacture products that contain 3TG necessary to the functionality or production of the products are required to make public disclosure about the origin of the 3TG and the company's due diligence on the source and chain of custody of those minerals.

Brightstar has implemented a due diligence program to identify and trace Conflict Minerals and, specifically, 3TG, in the Company's supply chain for Covered Products, which are based on procedures and tools provided by the Electronic Industry Citizenship Coalition (EICC)[3] , the Global e-Sustainability Initiative[4] (GeSI) and the OECD guidelines for responsible supply chains of minerals from conflict-affected and high-risk areas. Brightstar commits to identifying, reducing, and eliminating the use of Conflict Minerals supplied to the Company for which proceeds directly or indirectly finance or benefit armed groups in the DRC and Covered Countries. The Company intends to complete due diligence activities on all direct suppliers, which will be governed by policies, procedures, and management systems designed to prevent Conflict Minerals from entering the supply chains. Brightstar has communicated the Supplier Code of Conduct to each supplier, and the Company expects that suppliers will complete appropriate reviews of their supply chain to identify, disclose, and take remedial action if their products contain Conflict Minerals that finance conflict in the DRC or any of the Covered Countries.

To confirm compliance with the Supplier Code of Conduct, Brightstar's efforts will seek to:

- Require that suppliers comply with the Supplier Code of Conduct by adopting policies, procedures and due diligence management systems designed to prevent Conflict Minerals from entering the supply chain and compliant with the Responsible Minerals Assurance Process[5] (RMAP) developed by the Responsible Business Alliance (RBA) [6].
- Engage with each supplier's own upstream supply chain to determine the source and chain of custody of any product(s) supplied to the supplier that may contain Conflict Minerals.
- Identify products containing Conflict Minerals and provide a plan of mitigation and/or remediation to remove Conflict Minerals from said products.
- Identify the presence of 3TG and other Conflict Minerals in their products by requiring that suppliers complete and submit the Conflict Minerals Reporting Template (CMRT) annually, which promotes supply chain transparency and identifies the smelters and refiners utilized by each supplier in the delivery of their products.

1 Covered Products" means the Company's manufactured or contracted for manufacture land-based machine products (including, but not limited to, lottery terminals, instant ticket vending machines, printers, monitors, ticket scanners, and peripheral terminal devices).
2 SEC Rule 13p-1 and Form SD definition of "conflict mineral" includes cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tin, tantalum and tungsten, unless the U.S. Secretary of State determines that additional derivatives are financing conflict in the Covered Countries, in which case they are also considered "conflict minerals; or any other minerals or their derivatives determined by the U.S. Secretary of State to be financing conflict in the Covered Countries.
3 The EICC offers membership to companies that manufacture or contract the manufacture of electronic goods or of products in which electronics are essential.
4 The GeSI is an inclusive and multi-sectoral, multi-stakeholder organization that sources impartial information, resources and best practices for achieving integrated social and environmental sustainability in collaboration with members from major information and communication technology companies.
5 The RMAP was developed by the RBA to enhance company capability to verify the responsible sourcing of metals.
6 The RBA is the world's largest industry coalition dedicated to corporate social responsibility in global supply chains.

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Brightstar will suspend or discontinue any business transactions with a supplier after failed attempts at mitigation or remediation of non-compliance with the Supplier Code of Conduct until such time that the supplier becomes fully compliant or provides a plan within a reasonable timeframe to become conformant.

For the 2025 reporting year, the Company reviewed suppliers representing the vast majority of Brightstar's manufacturing and other in-scope suppliers. During the review process, suppliers were considered out of scope if the materials purchased from them did not contain Conflict Minerals or were not used in any of the Covered Products. Where any uncertainty remained regarding the potential presence of Conflict Minerals in materials supplied for the Covered Products, the supplier was considered in scope. For further details please refer to the Conflict Mineral Report available on the Brightstar's website.

As a global organization, Brightstar adheres to the EU Regulation on Conflict Minerals. This regulation recognizes the same minerals as Dodd-Frank, but expands the geographic focus to include Conflict-Affected and High-Risk Areas (CAHRAs) defined as "areas in a state of armed conflict, fragile post-conflict areas, as well as areas witnessing weak or non-existing governance and security, such as failed states, and widespread and systematic violations of international law, including human rights abuses." An indicative, non-exhaustive and regularly updated list of is available at www.cahraslist.net.

Brightstar maintains the communication and escalation procedure for supplier non-compliance with its Conflict Minerals Policy and Supplier Code of Conduct. Employees who have concerns regarding non-compliance with the Conflict Minerals Policy and/or violations of law related to Conflict Minerals may report such incidents through Brightstar's Integrity Line. Maintained by an independent provider, the Brightstar Integrity Line provides a confidential way to anonymously report non-compliance or violations via telephone or an online portal.



Reasonable Country of Origin Inquiry (RCOI)

The Responsible Minerals Initiative (RMI) and RMAP audit ensure that all certified smelters and refiners only use ores that are DRC conflict-free. As part of the Reasonable Country of Origin Inquiry (RCOI) process, Brightstar adopted the RMI industry approach and traced back the origin of conflict minerals by identifying smelters, refineries or recyclers, and scrap supplier sources. Brightstar also used the RMI and its RMAP to trace the conflict minerals back to the mine of origin.

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Climate Action, Biodiversity and Circularity

GRI 3-3; GRI 2-23; GRI 2-24

At Brightstar, climate action, biodiversity, and circularity represent key areas of focus, spanning the entire value chain from operations to supplier activities and product end-of-life. The Company is committed to minimizing its environmental footprint, enhancing energy efficiency, supporting the transition to renewable energy sources, and promoting biodiversity and circularity. This is done by selecting environmentally conscious materials and boosting recycling, reuse, and recovery practices through responsible resource use and sustainable product design.

This commitment is formalized in Brightstar's Environmental Policy, which outlines the Company's sustainability strategy, and its approach to managing environmental impacts and driving continuous improvement. In particular, this policy is linked to the Climate Action, Biodiversity, and Circularity sphere of impact and supports the three key elements of the Sustainability strategy to Empowering Our People, Collaborating with Partners, and Preserving the Planet.

In response to recent changes in its business structure, following the sale of the Gaming and Digital business, Brightstar has undertaken a review and update of its Environmental Policy. This process aims to ensure that the policy remains fully consistent with the Company's evolving business perimeter.

Brightstar's environmental initiatives support three of the UN SDGs:



Affordable and clean energy

Ensure access to affordable, reliable, sustainable and modern energy for all.



Responsible Consumption and production

Ensure sustainable consumption and production patterns.



Climate action

Take urgent action to combat climate change and its impacts.



Through its annual sustainable materiality analysis, Brightstar identifies the primary environmental impacts generated by its daily operations, both directly and indirectly, and continuously seeks to improve operational efficiency.

As part of its direct operations, Brightstar conducts instant ticket printing in Lakeland, Florida, and printing activities and lottery terminal assembly in Tito Scalo, Italy. Brightstar's other operational sites include offices, warehouses repair depots, and data centers. The main environmental impacts linked to Brightstar's direct operations include:

- Contribution to climate change: Consumption of electricity and fuels to power industrial production, data centers, and data processing and storage that contribute to greenhouse gas (GHG) emissions (Scope 1 and 2[1]).
- Air pollution: The use of fossil fuels in direct operations, such as paper and ink processing, results in the release of pollutant emissions, Volatile Organic Compound (VOC) and Hazardous Air Pollutants (HAP) into the atmosphere, negatively affecting air quality and human health.
- Damage to ecosystems: Ineffective waste management from Company operations, especially when waste is sent to landfills, may cause soil and water pollution and subsequently damage ecosystems.

Brightstar's company-wide monitoring systems allow for tracking environmental performance and evaluating progress toward sustainability targets. By using a data collection platform, Brightstar has strengthened the tracking of key metrics such as energy use, GHG emissions, water consumption, and waste generation.

Brightstar's Commitment to Compliance with Climate-Related Disclosure

The Company's 2025 UK Annual Reports and Accounts (UK ARA) included climate-related financial disclosures to comply with the requirements of the UK Companies Act 2006. Such disclosure requirements are aligned to, but do not directly mirror, the Task Force on Climate-related Financial Disclosures (TCFD) Guidelines. The 2025 UK ARA includes detailed disclosures on:

- Corporate governance oversight of climate-related risks and opportunities.
- Management of climate-related risks and their impact on the organization's strategy.
- Metrics and targets employed to assess and manage significant climate-related risks.

Further details may be found in the UK ARA.

Recognizing the growing regulatory and market emphasis on climate impact and transparency, Brightstar remains attentive to the evolving landscape of climate-related regulations across the jurisdictions in which it operates. In the U.S., for example, there have been notable developments at both federal and state levels. In March 2024, the U.S. Securities and Exchange Commission (SEC) adopted the Rules to Enhance and Standardize Climate-Related Disclosures for Investors (SEC Climate Rules). The SEC Climate Rules mandate that publicly listed companies disclose material climate-related risks, activities taken to mitigate or adapt to such risks, information on governance oversight of climate-related risks and information on any climate-related targets or goals that are material to the business, and results of operations and/or financial condition of such companies. More recently, the SEC published its proposal to rescind the SEC Climate Rules, with a final decision expected later in 2026. Brightstar continues to closely monitor any progression and assess potential implications for its operations.

1 Scope 1 emissions refer to direct emissions from sources owned or controlled by the Company, while Scope 2 emissions cover indirect emissions from the consumption of purchased electricity. For further details, please refer to the section "GHG emissions" of this Chapter.



Monitoring Evolving Regulatory Developments

As part of its commitment to continuously strengthen environmental performance across its value chain, Brightstar closely monitors evolving European regulatory developments. Two key initiatives, the Packaging and Packaging Waste Regulation (PPWR, Regulation (EU) 2025/40) and the Carbon Border Adjustment Mechanism (CBAM, Regulation 2023/956), will require progressive alignment in the coming years, with implications for supply chain management, product design, and reporting practices.

PPWR

The implementation of PPWR further strengthens responsible material management across Brightstar's supply chain. The PPWR will introduce binding requirements on packaging design, recyclability, reduction of hazardous substances, and minimum recycled content, all of which directly influence how suppliers must structure their processes and documentation. As these obligations come into play in the coming years, Brightstar will enhance its oversight and supplier engagement mechanisms to support alignment of packaging used within its products and logistics flows with applicable PPWR requirements.

CBAM

CBAM introduces structured compliance obligations for companies importing specific carbon-intensive goods into the EU, with the aim of preventing carbon leakage and aligning global carbon costs with the EU Emissions Trading System. As detailed in Brightstar's internal procedure, the mechanism requires formal identification of CBAM-relevant goods, verification of regulatory applicability, and continuous monitoring of imported quantities against regulatory thresholds. During the transitional phase, the focus is on accurate emissions data collection, traceability, and reporting. Starting in 2026, costs will be incurred through the purchase and surrender of CBAM certificates linked to embedded emissions.

To support compliance, Brightstar has established a structured governance model involving the Procurement, Environment Health Safety, Sustainability, and Compliance teams, with defined roles, internal controls, and segregation of duties. Emphasis is placed on data quality, supplier engagement to obtain primary emissions data, and systematic documentation to support audits and regulatory checks. The Company is also strengthening monitoring tools and planning processes to anticipate future cost impacts linked to carbon pricing. These measures support the integration of CBAM requirements into Brightstar's broader risk management and sustainability framework, helping to strengthen transparency, regulatory readiness, and alignment with decarbonization objectives across its supply chain.



Environmental Compliance Policy

Brightstar's Environmental Compliance Policy outlines processes for design, procurement, warehousing, manufacturing, reconditioning, and delivery, that are designed to support compliance of its products with applicable environmental requirements. The Policy includes measures to assess the environmental compliance of existing products and, where necessary, adapt them to support ongoing compliance with applicable environmental requirements. Products within scope are assessed in accordance with this process. Additionally, lottery equipment is marked with product safety labels and the Waste Electrical and Electronic Equipment Directive (WEEE) mark, as applicable.

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Environmental Management Systems and Certifications

Brightstar is committed to improving its environmental performance by implementing environmental management systems (EMS) certified according to the ISO 14001 standard. This standard provides a framework for improving the Company's environmental performance while managing responsibilities systematically and promoting accountability at leadership levels. Moreover, it engages key stakeholders through an evidence-based decision-making approach. The implementation and auditing of ISO 14001 are centrally coordinated at a global level, ensuring consistent application of the EMS framework across geographies and alignment with applicable local environmental regulations. These systems are in place in Lakeland, Florida, U.S. which was recertified in May 2025, and in Brightstar's Italian Rome and Tito Scalo facilities, which includes the Italian Repair Centers (IRC). Repair depots in the UK, Barbados, Trinidad and Tobago, Slovakia, Mexico, Chile, Jamaica, Poland, Czech Republic are self-certified ISO 14001 compliant. Additionally, several U.S. sites achieved this self-certification in 2025, including the lottery depots in Latham and Colonie, New York, the depot and repair facility in West Greenwich, Rhode Island, and the depots in Wallingford, Connecticut, and Madison, Wisconsin.

As of September 2025, about 12% of Brightstar's sites had been assessed for specific environmental risks within the ISO 14001 framework. The EMS located at the Company's site in Rome has maintained ISO 50001 certification since 2011 and, over the years, the scope has also been expanded to include the Pomezia Italy, warehouse, and the IRC. The Lakeland facility is expected to obtain the ISO 50001 certification in 2026.

The Forest Stewardship Council (FSC)

Brightstar Lottery SpA (FSC-N004198) believes that forests are vital for the future. This is why it uses FSC certified paper products. The FSC label indicates that products made from forest-based materials are certified in compliance with international FSC standards and support responsible forest management based on rigorously defined environmental, social and economic criteria. The FSC provides solutions to safeguard biodiversity and tackle deforestation and climate change by advancing responsible forest management.

Find out more at www.fsc.org.

Environmental Certifications

ISO 14001 Certification

Brightstar's ISO 14001 certification demonstrates a structured approach to managing key environmental aspects across its operations. Obtaining this certification is not only about regulatory compliance but also a key element of Brightstar's sustainability strategy and operational excellence. The Company places environmental protection and pollution prevention at the core of its activities, committing to continuous improvement in environmental performance through adequate resources, compliance with applicable laws, and efficient processes.

The certification covers energy and water consumption, waste management, paper use, environmentally responsible procurement, and IT infrastructure maintenance. It enables Brightstar to improve environmental performance, ensure regulatory compliance, manage risks proactively, reduce operational costs through resource efficiency, and foster a culture of continuous improvement and innovation.


CERTIFICATE OF REGISTRATION

QUALITY SYSTEMS REGISTRARS

This is to certify that the management system of:

Brightstar Global Solutions Corporation

Client Number: 2010-0276
4000 South Frontage Road, Building 400
Lakeland, FL 33815

Has been assessed and certified as meeting the requirements of:

ISO 14001:2015

This certificate of registration remains valid subject to satisfactory surveillance audits for the following activities:

The design, manufacture, printing and support of instant win lottery tickets.

Standard	Certificate Number	Certified Since
ISO 14001:2015	QSR-EMS-080	5/11/2011
Date Issued	Certification Date	Valid Until
9/17/2025	8/6/2024	8/5/2027

CAROL L. TILLMAN
VICE PRESIDENT

CT-9001-14001-45001 REV06222022 5045 HIGHWAY 162, HOLLYWOOD, SOUTH CAROLINA 29449 | (703) 478-0241 | QSR.COM

ISO 50001 Certification

ISO 50001 certification defines the requirements for establishing, implementing, maintaining, and improving an EMS, enabling organizations to adopt a systematic approach to continuously enhance energy performance, including energy efficiency and consumption.

This certification ensures structured monitoring, measurement, documentation, and optimization of energy use across equipment, processes, and people. It delivers key benefits such as improved energy performance, reduced energy consumption and GHG emissions, cost savings through greater efficiency, and full compliance with energy regulations.

Additionally, it supports proactive energy risk management, strengthens operational excellence through continuous improvement and innovation, and enhances stakeholder and customer trust by demonstrating a concrete commitment to energy efficiency.

To meet the certification requirements, Brightstar's sites implemented robust practices for measuring, documenting, and reporting energy use. This extended to the design and procurement of equipment and systems, as well as the involvement of personnel whose activities influence energy performance.


DNV

CERTIFICATO DI SISTEMA DI GESTIONE

Certificato n.: 0009-IM-2012-GEMS-ITA-ACCREDIA
Data Prima Emissione: 01 luglio 2011
Validità: 10 luglio 2023 – 01 luglio 2026

Si certifica che il sistema di gestione di
BRIGHTSTAR LOTTERY S.p.A.
Viale del Campo Boario, 56/D - 00154 Roma (RM) - Italia
e i siti come elencati nell'Appendice che accompagna questo certificato

È conforme allo Standard:
ISO 50001:2018

Questa certificazione è valida per il seguente campo applicativo:
Progettazione, realizzazione e gestione di giochi, lotterie e servizi per l'impresa ed il cittadino, erogati attraverso i punti vendita che on-line e gestione del calcolo e del pagamento delle vincite. Pianificazione, realizzazione e controllo dei sistemi di gestione aziendale e relativi processi amministrativi e contabili. Attività di diagnosi, riparazione, revisione e manutenzione degli apparati dei punti vendita in laboratorio interno (Area Tecnica: Edifici)

Luogo e Data
Vimercate (MB), 01 settembre 2025

Per l'Organismo di Certificazione:
DNV - Business Assurance
Via Energy Park, 14, - 20871 Vimercate (MB) - Italy

Claudia Baroncini
Management Representative

00010

Climate Change

GRI 3-3; GRI 302-1; GRI 302-3; GRI 302-4; GRI 305-1; GRI 305-2; GRI 305-3; GRI 305-4; GRI 305-5

Climate change represents a critical challenge for both society and the environment. Brightstar acknowledges its contribution to GHG emissions generated not only by direct operations but also across the value chain including logistics, supplier activities, product use, and end-of-life treatment. The consolidation approach used for CO_2e emissions is based on Brightstar's operational control.

The Company received formal validation from the Science Based Targets initiative (SBTi), a global corporate climate organization who defines and promotes best practices in emissions reductions and net-zero targets in line with climate science, in August 2023. The near-term targets aim for a 50% reduction in absolute Scope 1 and 2 emissions and a 30% reduction in Scope 3 emissions by 2030, compared to 2019 levels. The Company also committed to a net-zero target by 2050, with the goal of reducing Scope 1, 2, and 3 emissions by 90%, with the remaining 10% offset through credible carbon removal solutions in line with applicable SBTi net-zero frameworks.

Brightstar is actively working to define new science-based targets, tailored to its current organizational structure. Updates and validations of the Company's near-and long-term SBTi targets are planned for 2026, using 2025 as the starting year.

Brightstar is engaging with internal stakeholders and evaluating interim goals to meet its 2035 and 2050 climate objectives. The Company plans to reduce GHG emissions by:

- Leveraging advanced technologies to decarbonize operations through facility and infrastructure optimization.
- Transitioning to on-site renewable energy to decarbonize operations.
- Adopting eco-design principles, digitalization, and innovation to decarbonize products.
- Collaborating with suppliers and customers to enhance environmental practices and decarbonize the value chain.

Energy Consumption

Brightstar's direct energy use primarily involves natural gas for space heating and fuel for powering its fleet of company vehicles, including cars and light-duty trucks. During electrical outages, additional fuel is consumed to operate emergency generators.

Indirect energy use encompasses electricity consumption across the Company's global infrastructure, including offices, data centers, warehouses, and manufacturing facilities involved in printing and device assembly.

Energy Intensity (GJ/k$)[1]		
	2024	2025
Energy intensity	0.22497	0.24186

1 The ratio is calculated by dividing total energy consumption by total revenues in U.S. thousand dollars.

Energy Consumption (GJ)[1]			
Categories	2024	2025	
	Global	Global	Italian operations only
Electricity	218,139.87	233,990.94	55,684.94
of which purchased from renewable sources[2]	36,231.13	43,122.87	27,318.87
of which from self-produced renewable sources	-	105.52	-
Natural gas	85,232.72	131,609.03	14,657.36
Gasoline	242,987.30	226,417.03	3,294.84
Diesel	17,952.04	15,280.77	1,118.05
Propane	770.46	205.69	-
LPG	32.03	46.09	-
Total energy consumption	**565,114.43**	**607,549.55**	**74,755.19**

1 To evaluate natural gas and electricity consumption and related emissions across all active locations, data from smaller sites have been estimated based on average consumption per square meter. Moreover, 2024 data related to the Company's car fleet covered the full operational perimeter prior to the sale of the Gaming & Digital business; therefore, fuel and electricity consumption for Brightstar Lottery's fleet have been estimated based on the ratio between its revenues and the Company's total revenues.
2 Electricity purchased from renewable sources is certified by RECs (Renewable Energy Certificates) or verified by supplier communications.

GHG Emissions

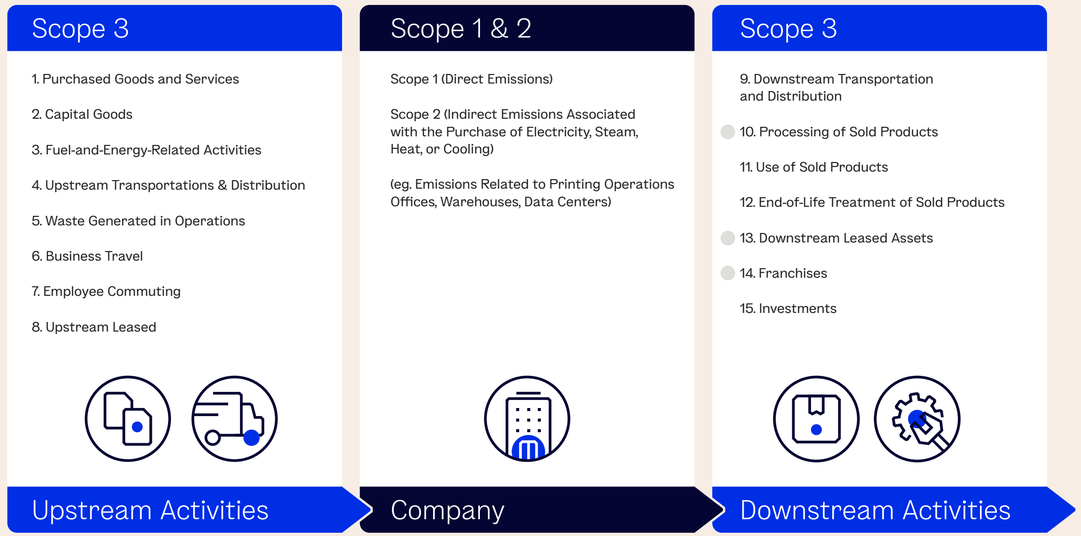
GHG emissions are categorized into three scopes: Scope 1, Scope 2, and Scope 3.

Brightstar discloses all relevant categories in line with GHG Protocol[1].

- Scope 1: direct emissions from sources owned or controlled by the Company. These include fuel combustion for heating (primarily natural gas), diesel used in backup generators, and fuel consumption from company vehicles. Brightstar operates a diverse fleet comprised of gasoline, diesel, and electric vehicles used for servicing lottery equipment, sales, and corporate mobility. The Company continues to monitor and manage factors such as idling, acceleration patterns, and vehicle load to optimize fuel efficiency.
- Scope 2: indirect emissions from the consumption of purchased electricity. These emissions are associated with the Company's offices, data centers, warehouses, and operational facilities. Brightstar remains committed to reducing electricity use and enhancing energy efficiency, while also seeking opportunities to source renewable electricity where feasible.
- Scope 3: all other indirect emissions that occur throughout the value chain. For Brightstar, these primarily arise from the procurement of goods and services, such as paper and device components, and from the use of sold products, including emissions generated by terminals and other devices over their operational lifespan. Over the years, the Company has worked on improving data collection and methodology to provide a transparent and reliable picture of its indirect emissions.

The following Scope 3 categories, in line with the GHG Protocol, are included in the calculation of Scope 3 emissions:

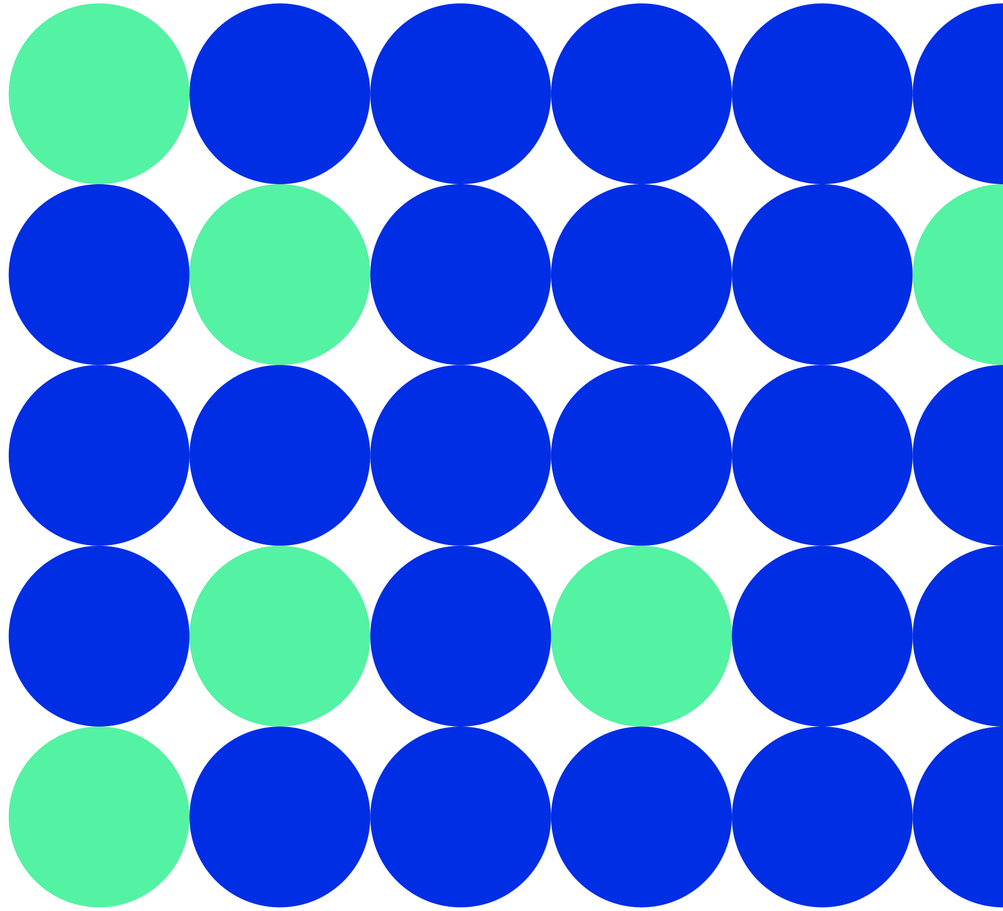
- Category 1 - Purchased goods and services: All upstream emissions from manufactured products purchased or acquired by Brightstar in the reporting year. Products include tangible goods and intangible services.
- Category 2 - Capital goods: All upstream emissions from the production of capital goods purchased or acquired in the reporting year. Emissions from the use of capital goods are accounted for in either Scope 1 (for fuel use) or Scope 2 (for electricity use), rather than in Scope 3.
- Category 3 - Fuel and energy-related activities: Emissions from the production of fuels and energy purchased and consumed in the reporting year that are not included in Scope 1 or Scope 2.
- Category 4 - Upstream transportation and distribution: Emissions from transporting and distributing products purchased in the reporting year between a company's tier-one supplies and its own operations in vehicles not owned or operated by the reporting company. This category also includes third-party transportation and distribution services purchased in the reporting year, including inbound logistics, third-party transportation, and distribution between a company's own facilities.
- Category 5 - Waste generated in operations: Emissions from third-party disposal and treatment of waste generated in the reporting company's owned or controlled operations in the reporting year. This includes emissions from disposal of solid waste and wastewater.



1 The GHG Protocol provides standards, guidance, tools and training for business and government to measure and manage climate-warming emissions (https://ghgprotocol.org/).

- Category 6 - Business travel: Emissions from the transportation of employees for business-related activities in vehicles owned or operated by third parties, such as aircraft, trains, buses, and passenger cars.
- Category 7 - Employee commuting: Emissions from employees commuting between home and work.
- Category 8 - Upstream leased assets: Emissions generated from the operation of assets that are leased in the reporting year and not already included in the reporting company's Scope 1 or Scope 2 inventories.
- Category 9 - Downstream transportation and distribution: Emissions that occur from transportation and distribution of sold products in vehicles and facilities not owned or controlled by the reporting company.
- Category 11 - Use of products sold: Emissions generated by the use of goods and services sold or leased in the reporting year by end users. End users include consumers and business customers that use final products. For Brightstar, this category includes the emissions generated by electricity consumption related to the use of lottery terminals and other retail devices throughout their entire lifespan.
- Category 12 - End-of-life treatment of products sold: Emissions from waste disposal to treatment of products sold by the reporting company at the end of their life. This category includes the total expected end-of-life emissions from all products sold in the reporting year.
- Category 15 - Investments: Emissions associated with Brightstar's investments not already included in Scope 1 or Scope 2. This category is applicable to investors and companies that provide financial services. Investments are categorized as a downstream Scope 3 category because providing capital or financing is a service provided by the reporting company.

The methodology used to compute the Scope 3 emissions mentioned above varies between categories depending on the emission factors used. The approach to each category could be either "spend-based," which uses emission factors based on money expense, or "activity-based," which uses emission factors based on physical criteria like weight, surface, and power.



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GHG Emissions (Tons CO_2e)			
Scope 1 - 2 - 3 *	**2024**	**2025**	
	Global	**Global**	**Italian operations only**
Scope 1	23,679.98	24,619.83	1,171.13
Scope 2 Location-based	19,326.93	20,280.65	2,784.25
Scope 2 Market-based	17,408.36	20,278.83	3,476.42
Scope 1 + Scope 2 Location-based	43,006.91	44,900.48	3,955.38
Scope 1 + Scope 2 Market-based	41,088.34	44,898.66	4,647.55
Scope 3	299,575.53	388,342.02	68,622.08

* As outlined in the 2025 UK ARA, the 2025 GHG emissions and energy data were updated in this report from the values shown in the 2025 UK ARA due to additional data becoming available following the publication of the 2025 UK ARA.

The table below shows the contribution of each emission category to the Company's total recorded market-based emissions for 2024 and 2025.

Market-Based Emissions				
Scope 1 - 2 - 3 *	**2024**		**2025**	
	Global	**% on Total**	**Global**	**% on Total**
Scope 1	23,679.98	6.95%	24,619.83	5.68%
Scope 2 Market-based	17,408.36	5.11%	20,278.83	4.68%
Scope 3	299,575.53	87.94%	388,342.02	89.64%
Total	**340,663.87**	**100%**	**433,240.68**	**100%**

Location-Based Emissions				
Scope 1 - 2 - 3 *	**2024**		**2025**	
	Global	**% on Total**	**Global**	**% on Total**
Scope 1	23,679.98	6.91%	24,619.83	5.68%
Scope 2 Location-based	19,326.93	5.64%	20,280.65	4.68%
Scope 3	299,575.53	87.45%	388,342.02	89.64%
Total	**342,582.45**	**100%**	**433,242.50**	**100%**

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Scope 3 GHG Emissions (Tons CO_2e)			
Categories	**2024**	**2025**	
	Global	**Global**	**Italian operations only**
1. Purchased Goods and Services[1]	163,584.24	196,468.22	56,912.75
2. Capital Goods	7,695.79	11,459.36	-
3. Fuel-and-Energy Related Activities	10,984.69	11,205.52	942.72
4. Upstream Transportation and Distribution	4,011.63	10,751.48	1,561.85
5. Waste Generated in Operations	13,773.97	3,219.72	855.88
6. Business Travel	8,710.69	7,634.63	-
7. Employee Commuting	6,273.34	6,331.18	-
8. Upstream Leased Assets	5,268.12	7,982.94	-
9. Downstream Transportation and Distribution	2,648.46	25,916.98	595.81
11. Use of Products Sold[2]	28,635.29	82,688.51	649.19
12. End-of-Life Treatment of Products Sold	46,208.81	18,979.89	7,103.89
15. Investments	1,780.50	5,703.59	-
Total Scope 3 Emissions	**299,575.53**	**388,342.02**	**68,622.09**

1 The Company identified a minor methodological difference applied by the Parent company, De Agostini S.p.A., in calculating emissions for the preparation of the GHG inventory for the reporting year. Specifically, for the selection of emission factors from the Ecoinvent 3.12 database (used to calculate the categories 3.1 - Purchased goods and services, 3.5 - Waste generated in operations, and 3.12 - End-of-life treatment of sold products), the De Agostini S.p.A. working group applied the cut-off methodology, rather than the "at the point of acquisition" (APOS) methodology adopted in previous years for Brightstar's calculations. The values calculated using the APOS methodology are as follows: Scope 3.1: 217,303 tons of CO_2e; Scope 3.5: 27,784 tons of CO_2e; Scope 3.12: 56,887 tons of CO_2e. Thus, the total value for Scope 3 emissions according to the APOS methodology is 471,648 tons of CO_2e.
2 Since 2024, the GHG emissions related to the use of sold and leased products have been fully attributed to Category 11 – Use of sold products, in alignment with the GHG Protocol guidelines.

The GHG calculation methodology is based on the GHG Protocol. Fuels and operations were factored using the UK Department for Environment, Food & Rural Affairs (DEFRA) conversion protocol within the reporting methodology. GHG emissions related to electricity were computed according to the emission factors issued by Terna and the Association of Issuing Bodies (AIB), except for U.S. states, which used state-based U.S. Green emissions factors. The figures reported herein include all applicable Scope 3 categories according to the GHG Protocol.

GHG Scope 3 emissions have been computed according to the GHG Protocol methodology, primarily using emission factors from Ecoinvent and DEFRA. For Category 8 (Upstream Leased Assets) and Category 11 (Use of Sold Products), the same emission factors were used for Scope 2 market-based emissions.

In 2025, Brightstar reported 44,899 metric tons of CO_2e emissions from Scope 1 and 2 market-based emissions. This includes 24,620 tons of CO_2e emissions from direct operations (Scope 1) and 20,279 tons of CO_2e emissions from purchased electricity (Scope 2). About 18% of all electricity consumed is certified as renewable, and further investments are planned to increase such usage.

The most significant environmental impact lies in Scope 3 emissions, which totaled 388,342 tons of CO_2e emissions representing 90% of total emissions. The largest contributors were Purchased Goods and Services (196,468 tons of CO_2e emissions), Use of Products Sold (82,689 tons of CO_2e emissions), and Downstream transportation and distribution (25,917 tons of CO_2e emissions). These figures highlight the importance of addressing emissions across the entire value chain.

Efforts to reduce the Company's environmental footprint are focused on enhancing supplier collaboration, improving product sustainability, and encouraging responsible consumption and disposal. By targeting both operational and value chain emissions, Brightstar is developing a more comprehensive and impactful climate strategy.

Emission Intensity (Tons CO_2e/k$)[1]		
	2024	**2025**
Emission intensity (Location-based)	0.13638	0.17247
Emission intensity (Market-based)	0.13561	0.17247

1 The ratio is calculated by dividing total Scope 1, Scope 2 and Scope 3 emissions by total revenues in U.S. thousand dollars.

Brightstar's Key Decarbonization Initiatives

Brightstar's decarbonization approach is guided by its broader climate and environmental ambitions and alignment with SBTi principles, while continuously evolving its targets to reflect organizational changes. Brightstar is pursuing the reduction of operational impacts through renewable energy sourcing, facility optimization, and low impact IT infrastructure, while advancing circularity, sustainable logistics, supplier engagement, and sustainable mobility programs. The Company is also promoting product-related decarbonization activities, including product carbon footprint (PCF) analyses to identify emission hotspots and inform eco design improvements, the expansion of digital and dematerialized gaming solutions, and the deployment of more energy efficient retail technologies. Together, these actions reflect an integrated and innovation driven approach to emissions reduction and support the Company's long-term climate objectives.

Decarbonizing Operations Through Facility and Infrastructure Optimization

Brightstar is actively working to reduce the environmental footprint of its global facilities by upgrading infrastructure and optimizing space usage. One of its key initiatives includes replacing outdated lighting systems with energy-efficient LED technology.

The shift toward remote and flexible working arrangements has also contributed to lower energy consumption across several locations.

Brightstar has also taken steps to reduce the carbon impact of its digital operations. At various development hubs worldwide, the Company has partnered with leading cloud service providers to migrate development and testing environments from on-premises data centers to the cloud. This transition supports continuous performance monitoring and enables the use of energy-efficient infrastructure while contributing to server consolidation, reduced hardware waste, and improved lifecycle management.

Brightstar implemented various asset management initiatives aimed at reducing its environmental footprint while supporting community education in the following areas:

- Procurement: Brightstar evaluates purchases against established requirements, including technical specifications, energy efficiency criteria, and the availability of product disposal guidance.
- Asset disposal and recycling: Conducting asset obsolescence evaluation to determine whether some assets can be retained for future component reuse.
- Donations: technology equipment deemed obsolete for corporate needs may be donated to educational institutions.

In 2025, Brightstar worked on relocating its registered office in London to a new site, with the move finalized in early 2026, as part of a broader workplace strategy focused on operational efficiency and environmental impact. The new location, a repurposed warehouse, supports adaptive reuse principles and contributes to reducing embodied carbon. In addition, the building is powered by renewable electricity and already holds ISO 14001 Environmental Management Certification, further supporting the Company's efforts to reduce its carbon footprint.

As part of the London office optimization program, the surplus furniture, fixtures and equipment were donated to local community charities. The remaining items were responsibly processed through approved recycling channels, substantially reducing the amount of waste sent to disposal.

This sustainable office relocation strategy was also utilized in UK-based Croxley and Aintree locations.

The Company is continuing to prioritize sustainability across its portfolio, through the consideration of environmental criteria in location selection and the integration of energy-efficient solutions.

A key initiative for 2026 includes optimizing the U.S. headquarters in Rhode Island with a target of 50% reduction in the Providence office space. This project will incorporate LED lighting upgrades, responsible recycling and donation of furniture, fixtures, and equipment, and the sourcing of sustainable furniture and furnishings with low VOC emissions. The Company will also begin transitioning its Rhode Island operations to renewable electricity decarbonizing data centers through energy efficiency and optimization.

Brightstar is actively pursuing a range of initiatives to reduce the environmental impact of its data center operations, with a strong focus on lowering energy consumption and associated GHG emissions. A central element of this strategy is the transition from in-house data centers to external co-location facilities. These facilities are selected based on their environmental credentials and geographic proximity to ensure both operational efficiency and sustainability.

The migration process involves the phased relocation of Brightstar-owned equipment racks to the selected co-location site and is supported by system consolidation, space optimization, and the replacement of outdated, energy-intensive hardware with more efficient, next-generation technology. Brightstar is developing a monitoring system to track energy use in real time and identify opportunities for continuous improvement.

The first migration began at the Austin Data Center in February 2024 and involved the transfer of systems to a co-location partner which reports sourcing 100% of its electricity from renewable energy. This move was expected to deliver multiple benefits:

- Operational: Improved resilience and efficiency, alignment with Brightstar's cloud strategy, and reduction in the total cost of ownership for the Data Center of the Americas (DCA) over the next decade.
- Environmental: Reduced energy consumption and shifting Scope 1 and 2 emissions to Scope 3.

The migration process at the Austin Data Center was completed in February 2025 and serves as a benchmark for future data center transitions. This migration enabled an electricity consumption reduction of around 3,100 GJ, from over 11,200 GJ in 2024, to just over 8,100 GJ in 2025 equivalent to a 28% reduction, as well as a decrease in Scope 2 emissions, with location-based emissions reduced by 328 tCO_2e and market-based emissions reduced by 363 tCO_2e. The initiative also involved relocating operations staff from the DCA to the Austin Technology Center (ATC), a facility already owned, managed, and maintained by Brightstar. Design, planning, and construction activities were completed in June 2025, with the Certificate of Occupancy issued on July 31, 2025.

Decarbonizing Operations Through Renewable Energy Transition

Since 2019, as a first step to reducing its carbon footprint, Brightstar purchased a number of Guarantees of Origin, as part of its agreements with energy providers, to certify that almost 100% of the electricity consumed by facilities in Italy comes from renewable sources. In 2025, certificates were purchased to cover 30% of electricity consumed in Lakeland, Florida, which will contribute to Scope 2 market-based emission reduction efforts.

A photovoltaic system was installed at Brightstar's facility in Madrid, Spain. The installation comprised 54 solar panels, each with a power output of 460 watts, resulting in a total capacity of 24.84 kWp.

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MoveSmart MoveBright in Italy

As part of its decarbonization strategy, Brightstar promotes sustainable mobility behaviors among its employees including commuting solutions, reduced reliance on private vehicles, and greater adoption of public transport and alternative modes of travel.

In Italy, the "MoveSmart MoveBright" program, launched in 2022, encourages employees to adopt lower-impact commuting behaviors, such as using public transportation, cycling, walking, carpooling, or shared mobility solutions, by awarding points based on their choices. These points are then converted into employee benefits and Company donations to sustainability-related projects, linking individual behaviors to both environmental and social impact.

MoveSmart MoveBright

Decarbonizing Products Through Innovation

To design effective decarbonization initiatives, Brightstar conducted comprehensive PCF assessments for instant tickets and draw-based games, developing a detailed, data-driven understanding of their environmental impacts across the entire lifecycle of the products.

The PCF analysis involved a thorough breakdown of all lifecycle stages, including production processes, logistics flows, device usage, consumables, and physical point of sale across the country. This approach enabled a granular quantification of both individual and combined emission sources, and a clearer understanding of the interactions among the various members of the value chain.

These assessments identified the key emission hotspots associated with each product category, such as material sourcing and ticket production for instant games, and device usage and consumables for draw-based games, highlighting where targeted decarbonization actions can deliver the greatest impact. Brightstar is increasingly promoting dematerialized and digital gaming solutions, with the aim of reducing reliance on physical materials and lowering the environmental impact of its products, fostering the adoption of eco-design principles, improvements in resource use, and energy efficiency of devices. The PCF assessments provide a robust foundation for defining initiatives and strategies to reduce emissions, while supporting a broader strategy focused on climate mitigation, operational efficiency, and enhanced circularity.

Decarbonizing Products Through Eco-Design, Innovation and Lifecycle Optimization

Brightstar continues to advance its climate action, biodiversity, and circularity objectives through a structured eco-design roadmap designed to identify opportunities to reduce environmental impacts across the product lifecycle. Brightstar's Product Responsibility Policy promotes energy efficiency, responsible material selection, and circularity, along with compliance with the EU directives Restriction of Hazardous Substances (RoHS), Registration, Evaluation, Authorization, and restriction of Chemicals (REACH), Persistent Organic Pollutants (POP), and WEEE.

Brightstar is developing a materials and components tracking framework to identify areas for more sustainable or lower-impact alternatives. This structured assessment will map current materials, evaluate environmental impact considerations associated with alternative materials and components, and define recommendations to guide future product iterations.

For both the Retailer Lens and Retailer Pro S2, the Company plans to adopt a packaging solution designed to be recyclable in existing recycling streams, subject to local collection, sorting, and recycling infrastructure to eliminate all expanded polystyrene (EPS) foam internal packaging materials in favor of molded pulp trays and corrugated structural components. The Retailer ProS2's carton size has been reduced, and the new internal structure allows 30% more cartons to be packed in each container.

The Company is also strengthening its approach to sustainable packaging and shipping, mapping current materials, ongoing improvements, and long-term objectives. This includes updates on initiatives such as the GameTouch 28's packaging redesign and near-shoring efforts to reduce transport-related emissions.

To enhance energy performance, Brightstar is designing a power-consumption reporting solution for its terminals. This initiative will enable systematic monitoring of energy use and support long-term efficiency improvements.

In line with its circularity goals, Brightstar is exploring spare-parts recycling and gathering best practices used in repair centers to assess their scalability across the organization. This work supports the Company's commitment to responsible manufacturing and waste reduction.

Finally, Brightstar continues to invest in Life Cycle Assessment (LCA) leadership, working to secure internal expertise and define a transition model that reinforces the long-term ambition to support the integration of LCA methodologies into product development and decision-making over time.

Together, these initiatives reflect Brightstar's commitment to responsible innovation. By advancing ecodesign practices across materials, energy performance, circularity, packaging, and LCA, Brightstar continues to embed sustainability into product development and contribute to the Company's long-term goals for reducing environmental impacts and accelerating the transition toward more circular solutions.

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The Retailer Pro S2: LCA-Driven Eco-Design

The Retailer Pro S2 represents the next step in lottery terminal evolution, delivering cutting-edge technology in a compact, space-saving design. The Retailer Pro S2 has been designed prioritizing energy efficiency and emissions reduction throughout its lifecycle. Developed through a comprehensive LCA, the terminal specifically addresses key emissions hotspots, applying eco-design principles to minimize environmental impact at every stage, from production to use.

As a result, internal LCA work indicates that the Retailer Pro S2 achieves a lower carbon footprint and a reduced overall environmental footprint compared to the Retailer Pro under the assessed assumptions and system boundaries. The smaller and lighter design reduces material use and is expected to lower related impacts. In addition, the terminal is engineered to consume less energy, during use, which is associated with a reduction in emissions over time.



Enhanced Digital Playslip Functionality

From an environmental standpoint, playslips represent a significant hotspot within the overall carbon footprint, as they act as a convergence point for multiple sources of emissions, from material use at physical points of sale to the game solutions offered to players.

Brightstar's mobile convenience app gives registered players access to a robust set of digitally integrated features, strengthening transparency, personalization, and digital engagement. Players can select and store their numbers, create a digital playslip, and scan it at retail terminals to produce a ticket, helping reduce paper use and supporting a more accurate completion process.

Enhancements completed in 2025 include:

- Player Identification & Personalized Preferences - This mirrors the global movement toward stronger player protection, data-driven responsible gaming tools, and customization.
- Enhanced Loyalty Integration - This reflects industry trends where lotteries increasingly integrate connected digital journeys, loyalty ecosystems, and mobile-first experiences to meet shifting consumer expectations.
- Digital-First Prize Processing - Promotes paperless operations and reduces the need for physical ticket production, in line with broader environmental priorities in lottery sustainability research.

The ability to save and reuse wager information, even without full login, can help reduce environmental impact and enhances user friendliness.

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Decarbonizing Maintenance through Remote Troubleshooting and Self-Service Solutions

At the end of 2023, Brightstar introduced in Italy the ability for self-maintenance of terminal software, allowing terminals to repair autonomously through recovery and self-loading procedures in the event of software damage. In 2024 and 2025, the initiative helped reduce field interventions—and the emissions associated with vehicle fleet movements—by approximately 2–3%, contributing to the reduction of carbon dioxide, nitrogen oxide, sulphur oxide and particulate matter emissions.

Through this new process, approximately 2,000 field interventions were deemed unnecessary, resulting in significant GHG emissions savings of around 10 tons of CO_2e emissions annually.

Decarbonizing the Value Chain through Stakeholder Engagement and Operational Efficiency

Building on its decarbonization strategy, Brightstar is focusing on reducing emissions across its value chain by strengthening collaboration with key stakeholders and improving the efficiency of operational processes. Through targeted initiatives involving suppliers and retail partners, and the optimization of logistics and service activities, the Company aims to enhance transparency, promote more sustainable practices, and minimize indirect emissions.

These efforts reflect a more integrated approach to decarbonization, extending beyond direct operations to include the broader ecosystem in which Brightstar operates.

Decarbonizing the Supply Chain through Supplier Engagement

To drive reductions in GHG emissions from electronic and energy-intensive products, Brightstar puts a strong focus on supplier engagement. To date, the Company has focused on identifying and prioritizing suppliers with the greatest emissions impact, collecting initial data on their reporting practices, and beginning the development of outreach materials to guide them toward improved disclosures and emission reduction actions.

In 2025, Brightstar focused on strengthening supplier engagement by improving emissions transparency, increasing data-driven engagement, and identifying reduction opportunities based on the previous year's assessment.

In 2026, Brightstar plans to streamline its internal approach by reducing duplicative efforts across teams. This includes developing a single, global supplier list aligned with its product portfolio, which will be reviewed and refreshed annually to reflect business and sustainability priorities. This unified list is expected to improve visibility across the supplier base and support more informed decisions regarding product composition and supplier selection, helping identify opportunities to reduce GHG emissions.

Brightstar hired a dedicated Sustainability Procurement Manager to support the direct and ongoing collaboration with suppliers, enabling the Company to deepen discussions, identify challenges earlier, and develop more tailored pathways to reduce GHG emissions in partnership with suppliers. The role sits within Global Procurement, ensuring that sourcing-related ESG considerations are embedded in enterprise-wide priorities, frameworks, and decision-making processes.

In addition, the Sustainability Procurement Manager has executive-level visibility and accountability for sustainability initiatives, supporting the cohesive and consistent governance Brightstar's sustainability commitments spanning environmental performance, responsible sourcing, human rights, and supplier engagement are governed cohesively and consistently across regions.

In 2025, 12 suppliers took part in the Company's optional ESG questionnaire which assessed key areas such as environmental practices, labor standards, human rights safeguards, ethical business conduct, and overall compliance readiness.

Based on the reviews completed to date, Brightstar did not identify any sustainability issues, gaps, or remediation needs among the participating suppliers. The participating suppliers met the baseline requirements outlined in the Supplier Code of Conduct and sustainability policies.

In 2026, the ESG Questionnaire will be automated with Brightstar's procure-to-pay system. This integration is expected to improve connectivity across processes and support higher supplier response rates.

Decarbonizing Sales Team Operations

Brightstar integrates sustainability across its commercial operations in Italy, recognizing the key role of the sales team in supporting climate change mitigation through digitalization, responsible resource use, and low-impact operations.

To support the reduction of indirect emissions, Brightstar works to streamline commercial support processes, including requests, prospect contracting, ownership changes, and transfers. These activities, which are typically managed through high volumes of internal email communications, have been progressively optimized, improving operational efficiency and reducing email traffic, thereby contributing to a lower environmental impact.

Four national sales meetings are held throughout the year to provide periodic updates to the sales team. The CO_2e emissions generated by these events were addressed through the purchase of carbon credits supporting the Ibanda-Makera Forest Cookstoves Project in Rwanda, which according to project documentation was associated in 2025 with the compensation of over 25,000 kg of CO_2e. These compensated emissions are reported separately from direct emission reductions within Brightstar's value chain.

Event locations are also chosen based on environmental criteria, which includes the use of recyclable materials, efforts to reduce water waste, energy efficiency, the choice of locally sourced products, and the promotion of Fair Trade.

Brightstar also continues to promote sustainable mobility within its Italian sales team. Since 2024, top-performers using fully electric vehicles have been eligible for a mobility bonus, to encourage the transition toward lower-emission transportation.

The digital Sales Book application, a core element of Brightstar's Italian digital transformation since 2017, has replaced printed brochures and paper binders, significantly reducing paper usage and enabling low-impact operations through consumption and supporting the transition to fully digital workflows within the Italian sales team. Between 2017 and 2025, this initiative resulted in savings of more than one ton of paper.

This transition toward digitalization has been further extended through the introduction of paperless shipping documentation across warehouse operations, replacing paper-based processes with digital solutions accessible via the web portal and mobile app in Italy.

The sales book platform is hosted in a wind-powered data center in Italy that reports renewable electricity sourcing, which supports lower operational emissions under the applicable accounting approach. Residual environmental impacts associated with digital tools, training, and communications are addressed separately through certified projects.

Decarbonizing Retail Operations Through Digital Training Solutions

In 2025, Brightstar engaged more than 30,000 Italian retailers via digital training programs covering responsible gaming, sustainability, cybersecurity, onboarding for new draw and instant ticket games, and store development strategies, including marketing, product promotion, inventory management, display techniques, and customer engagement.

The strategic shift toward digital training has supported efforts to reduce environmental impacts associated with training activities. Retailer travel was identified as a key source of emissions associated with traditional in-person training. By utilizing e-learning platforms, Brightstar has reduced the need for retailer travel while supporting participant engagement and satisfaction. These initiatives contribute to the Company's broader efforts to reduce emissions associated with its operations.

Similar efforts have been implemented in the United States, where retailer training programs in Indiana and New Jersey have transitioned from in-person sessions to virtual formats. A QR code system has been introduced for California Lottery retailers and staff, providing instant access to frequently used Quick Reference Guides. This initiative enhances cost efficiency while reducing paper consumption linked to printed training materials, supporting Brightstar's commitment to sustainability across its operations.

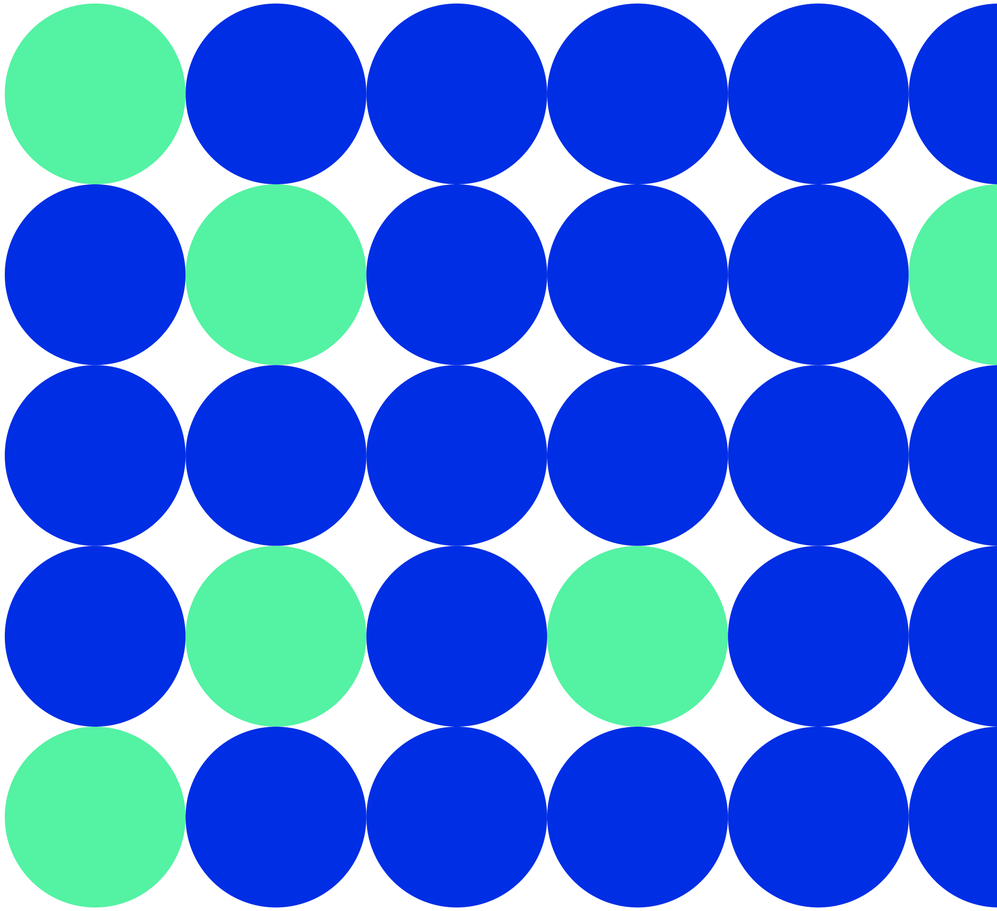
Decarbonizing Logistics Through Optimized Deliver and Necessity-Driven Distribution

Brightstar is currently working with a third-party packaging design firm to improve container utilization and optimize the point-of-sale terminal shipping cartons globally.

A route optimization Artificial Intelligence (AI) tool has been introduced to automate and optimize field service technician routing. The tool is designed to improve route planning efficiency and support reductions in travel distance, travel time, and fuel consumption, while reducing manual dispatching activities.

Brightstar uses a necessity-driven approach to shipping materials related to draw games in Italy, ensuring retailers receive only what is necessary. This strategy helps minimize unnecessary shipments and reduce emissions associated with transportation.

To further enhance efficiency, the Company analyzes the average usage of distributed materials. This allows Brightstar to better anticipate retailers' needs and consolidate multiple items into a single shipment, when possible, reducing packaging waste and frequency of deliveries.



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Biodiversity

GRI 3-3; GRI 101-1; GRI 101-2; GRI 101-4

Biodiversity loss is now recognized as one of the most pressing environmental challenges facing both humanity and businesses. It refers to the ongoing decline in the variety of life on Earth, including plants, animals, bacteria, and humans, that make up our planet's biological richness. Human consumption patterns and activities that disrupt or destroy ecosystems are among the primary drivers of this decline, posing serious risks to biodiversity and long-term ecological balance.

One of the leading contributors to biodiversity loss is land-use change, often fueled by the global demand for paper and other natural resources. This impact on biodiversity has emerged as a key issue in Brightstar's materiality assessment, reinforcing its commitment to understanding how its activities affect ecosystems and natural habitats.

Brightstar's biodiversity commitment is articulated within its Environmental Policy, which recognizes biodiversity loss as a critical global challenge linked to land-use change and natural resource demand. The Policy applies to all entities, affiliates, suppliers, employees, and downstream stakeholders, and extends to future mergers and acquisitions. Brightstar commits to responsible sourcing practices, particularly for paper-based products, supported by supplier efforts to ensure compliance with environmental standards. The Company explicitly prohibits engagement in activities that threaten biodiversity, such as illegal logging and deforestation, and promotes sustainable practices aligned with applicable regulations[1].

The Company seeks to enhance synergies between biodiversity protection and climate action by promoting sustainable sourcing and reforestation initiatives. In addition, Brightstar applies due diligence and stakeholder engagement processes to identify, assess, and address biodiversity-related impacts while considering the perspectives and interests of affected stakeholders.

The Company's most significant biodiversity impacts are primarily located along its supply chain, particularly related to paper sourcing for lottery tickets[2].

Brightstar's Lakeland, Florida printing facility maintains the FSC Chain of Custody certification[3], verified annually by an independent third-party registrar. The certification supports the traceability of paper products to FSC-certified and other FSC-controlled sources in accordance with FSC Chain of Custody requirements. The Company's Tito Scalo printing facility in Italy has adopted a formal policy to support its FSC Chain of Custody certification. The certification, which is subject to independent verification, provides a framework for the traceability of certified printed materials in accordance with FSC requirements. Brightstar maintains an FSC Chain of Custody management system designed to support compliance with FSC certification requirements for products manufactured and labeled under the FSC framework. The Company also procures raw materials that are either FSC-certified or verified, in accordance with FSC requirements, as not originating from controversial sources. In addition, Brightstar collaborates with suppliers of forest-based materials that have obtained, or are actively pursuing, recognized forestry certifications and promotes the use of FSC-certified paper and cardboard among its customers.

During its relationship with the FSC, Brightstar has committed not to be involved, directly or indirectly, in the following activities that are deemed unacceptable and a threat to biodiversity:

- Illegal logging or illegal trade in timber or forest products.
- Violation of human and traditional rights during forestry operations.
- Destruction of high conservation values during forestry operations.
- Major conversions of forests to plantations or other non-forest uses.
- Introduction of genetically modified organisms in forestry operations.

1 While the policy aims at defining a structured and value chain-wide approach to limit biodiversity loss, it is not yet fully aligned with the 2030 Targets and 2050 Goals of the Kunming-Montreal Global Biodiversity Framework, and does not explicitly include targets on the matter.
2 For further details on the methodology followed to identify the Company's impacts on biodiversity, please refer to the Methodological Note of this Report.
3 The certification associated with the Tito Scalo printing facility refers to the legal entity Brightstar Electronics and Services S.p.A.

Treedom

In 2022, the Company began a partnership with Treedom, planting a total of 2,900 trees by the end of 2024.

In 2025, with the launch of Brightstar, the existing Treedom site was divided, and a new Brightstar Lottery Treedom site was created. The website is currently being maintained by Treedom, as it provides updates for the 133 “keepers” of trees that had been gifted by Brightstar. At the end of 2025, Treedom reported that the new Brightstar forest consisted of 1,000 trees, planted in six countries, which according to Treedom estimates may absorb approximately 138 tons of CO_2e. Actual carbon benefits depend on factors such as tree survival, growth rates, project duration, and methodology. Seven species have been planted, one of which is endangered. Local farmers receive training in sustainable agriculture, including soil care, crop compatibility, and biodiversity enhancement techniques.

Responsible Material Sourcing for Products

For years, Brightstar has been conducting a comprehensive mapping of all lottery products in Italy as part of its effort to promote the use of FSC-certified materials and engage with suppliers that maintain recognized sustainability-related management systems. Additionally, the Company has been using FSC-certified paper for all lottery products.

Choosing Sustainable Solutions at Lottery Events

In 2025, Brightstar actively hosted and participated in a wide range of industry events, and sustainability remained a central focus across all event-related activities. This included responsible catering practices, such as eliminating single-use plastics, offering water refill stations, and using reusable or glass tableware in collaboration with the event organizers. The quantity of promotional materials ordered was reduced and sourced from vendors selected based on sustainability-related criteria. To help reduce environmental impacts associated with event activities, Brightstar prioritized sourcing such materials locally to avoid the need for long-distance shipping while supporting regional businesses. For international events, the Company partnered with a booth vendor that collaborated with EU-based suppliers, avoiding overseas freight and supporting efforts to reduce transportation-related emissions associated with event logistics.

Events with Offset Emissions – CO_2 Initiative with Up2You

As part of its long-term sustainability strategy, Brightstar in Italy renewed its partnership with Up2You, a certified B Corp, to offset the greenhouse gas emissions associated with selected corporate events, through Gold Standard-certified climate projects. One of the initiatives supported through this collaboration is the Ibanda-Makera Forest Cook Stove Project in Rwanda. By distributing energy-efficient cookstoves to more than 60,000 low-income families, the project significantly reduces GHG emissions and indoor air pollution. This improvement helps protect health, especially for women and children, while promoting gender equity, and freeing up valuable time previously spent collecting firewood. From an environmental perspective, the initiative also contributes to the protection of the Ibanda-Makera Forest, one of Rwanda’s last remaining natural ecosystems, through the planting of more than 110,000 native trees. According to project documentation, this effort contributes to biodiversity conservation, carbon sequestration, and long-term ecosystem resilience.

The project also invests in environmental education and supports local schools, fostering sustainability awareness while enhancing educational opportunities within communities. By supporting Gold Standard-certified climate projects, Brightstar Italy contributes to broader sustainability objectives while complementing its approach to managing emissions associated with selected events. The initiative aligns with several UN SDGs and reflects the Company’s commitment to supporting environmental and social initiatives that are associated with positive outcomes for communities and ecosystems.



Reducing Environmental Impacts in Trade Marketing

In Italy, Brightstar’s environmental footprint is closely linked to the use of paper for lottery playslips, supporting game materials, Gratta e Vinci instant tickets, and certain point-of-sale communication tools. To support responsible paper sourcing, the Company procures paper from suppliers that maintain FSC certification or other recognized forest management certifications. From a waste management perspective, the paper used holds a B-level recyclability rating under the Aticelca 501 system, meaning it can be processed through standard recycling streams with a scrap rate below 20%.

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Circularity

Brightstar approaches circularity through the promotion of circular economy models, leveraging its experience to improve process design, foster dematerialization, and encourage both material reuse and the extension of product lifecycles. Central to this approach is the adoption of a Life Cycle Thinking perspective, where the design phase plays a pivotal role in embedding circular principles into products and processes from the outset. Brightstar has applied a methodology to analyze the full "journey of a game," enabling the identification and assessment of opportunities for efficiency improvements and impact reduction across all lifecycle stages. Through this framework, key circularity aspects, such as durability, modularity, repairability, and recyclability, are systematically evaluated. This approach also emphasizes the enhancement of processes that address environmental needs, including efficient resource management through dematerialization, optimized logistics, and the provision of support services to retailers to extend the useful life of devices and support their recovery and reuse at end of life where feasible.

Waste Management

GRI 3-3; GRI 306-1; GRI 306-2; GRI 306-3; GRI 306-4; GRI 306-5

Brightstar is committed to advancing circular economy principles and minimizing waste across its operations.

Waste and Device End-of-Life Management

Waste generation primarily occurs at Brightstar's manufacturing and printing facilities during production processes and at the end-of-life stage of sold products. Environmental impact is most significant when materials cannot be recycled or reused, resulting in waste that could otherwise be reintegrated into the production cycle. To address this, Brightstar continuously monitors waste streams and works to enhance the circularity of its operations.

Second-life Management and Internal Reuse Process for Devices, Spare-parts and Materials

Brightstar aims to preserve finite resources through a framework of material circularity that focuses on extending the useful lifespan of devices. This involves identifying and implementing the reuse, redistribution, and refurbishment of resources and devices. In 2025, Brightstar processing centers completed 15,000 assets through the second life program, reusing decommissioned assets that still had usable life to support other regions, avoiding disposal, extending asset life, and reducing procurement and waste. This ongoing program supports a structured approach to asset circularity by extending the useful life of devices, reducing waste generation, and helping to avoid emissions associated with the manufacture of new equipment.

Brightstar works with its customers to encourage the redistribution of Lottery-owned equipment across sites globally, facilitating buyback options where applicable. For equipment owned by Brightstar, compatibility, license duration, and site-specific needs are assessed on an individual basis.

The Company also makes a conscious effort to reuse devices and components worldwide, including complete counter-top terminals, printers, and peripheral equipment, as well as reclaiming parts from older devices that still have a useful life remaining.

Waste Management and Recycling in Lakeland

Brightstar's Lakeland, Florida, U.S. site has implemented a comprehensive recycling program for a range of waste types, including electronic and metal. Waste from instant ticket printing operations is carefully sorted and directed into appropriate recycling channels. A designated onsite accumulation area organizes waste by zone, with clear labeling to ensure proper handling.

The Company's instant ticket production is heavily dependent on paper, but 100% of paper waste at the Lakeland printing facility is recycled. This commitment aligns with the sustainability standards upheld by its primary paper suppliers while helping to reduce the environmental impact of paper use.

The Lakeland facility features an in-house ink color-matching and mixing center, enabling ink production to be tailored to specific project requirements. This approach supports more efficient material use and helps reduce waste generation associated with surplus ink and non-recyclable plastic containers.

In 2025, Lakeland sent more than 759.3 kg of toner cartridge waste to a certified recycling provider, donated surplus paper from printing operations to local schools for educational and creative use, and reduced site landfill waste by utilizing Accurate Paper Recycling, a vendor that converts materials that would otherwise be sent to landfills into alternative energy sources. In 2025, Brightstar redirected more than 41,268 kg of waste generated at its Lakeland facility away from the landfill.

Recovering Outer Shells of Printing Cartridges at the Tito Scalo Facility

Since 2020, Brightstar has implemented a reuse program for printing cartridge outer shells in Italy. Although the plastic components of the printing cartridges often remained in excellent condition, they have contributed significantly to overall waste. To address this, Brightstar began reusing the cartridge shells, typically up to three times, by replacing only the ribbon inside the cartridge. This has enabled the Company to reuse approximately 40% of the cartridges' plastic components reducing the need for virgin plastic materials.

In 2025, Brightstar successfully repurposed around 610,000 printing cartridges, accounting for 80% of its total cartridges produced that year. As a result, the program helped avoid the use of approximately 240 tons of new plastic materials through the reuse of existing cartridge components.



Reducing Paper Waste at Retailers Through Digital Menu Boards

In 2025, lotteries continued accelerating their shift toward digitally enabled, environmentally conscious retail operations, reflecting both industry expectations and Brightstar's strengthened sustainability strategy. Brightsar's digital menu board has become an important component of the Company's retail modernization efforts, providing a digital alternative to traditional instant ticket display materials.

The digital menu board replaces traditional physical merchandising materials, including plastic dispensers, cardstock inserts, and monthly printed game marketing materials, with a digital display interface.

Waste Generated (Tons)[1]				
Categories	**2024**		**2025**	
	Waste diverted from disposal	**Waste directed to disposal**	**Waste diverted from disposal**	**Waste directed to disposal**
Non-Hazardous	5,460.74	1,610.00	12,215.11	1,052.65
Hazardous	1.23	3.51	6.88	5.96
Total	**5,461.97**	**1,613.51**	**12,221.99**	**1,058.61**

1 To evaluate waste consumption and related impacts across all active locations in 2024 and 2025, data from smaller locations have been estimated based on average waste consumption per square-meter. In addition, waste data is reported using a standardized approach across all locations, distinguishing only between waste diverted from, and waste directed to, disposal. More detailed categorization by disposal method is not included due to inconsistencies in data availability across sites operating in different geographies with varying waste management practices.

Waste Disposal

In 2025, Brightstar produced 13,280.6 tons of waste, of which 92% was sent for recycling, reuse, or other recovery options, and the remaining 8% sent to landfill or incineration. Non-hazardous waste, which represents 99% of produced waste, includes mainly paper, cardboard, and components of terminals and other devices. Hazardous waste consists only of electronic spare parts.

Water Resources

GRI 3-3; GRI 303-1; GRI 303-2; GRI 303-3; GRI 303-4; GRI 303-5

Brightstar uses water for restrooms, cafeterias, office activities, and silkscreen printing. Most water usage comes from the procurement of paper, as suppliers often use a significant amount of water during production processes. Brightstar actively monitors water consumption and is committed to reducing it over time. By improving internal efficiency, the Company aims to minimize its overall impact on water resources, especially in water-stressed regions.

Approximately 99% of Brightstar's water withdrawal comes from third parties, and to a lesser extent, from surface and groundwater. Around 41% of water withdrawal occurs in areas of water stress. Also, nearly all discharges were attributed to third parties. When accurate data was not available, it is assumed that for each site, 90% of withdrawals were discharged. In 2025, water consumption, the difference between water withdrawal and water discharged, amounted to 63.74 megaliters, and mainly occurred at Brightstar's Lakeland printing facility.

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Water Withdrawal, Discharge and Consumption (Megalitres)[1]			
Categories	**Sources**	**2024**	**2025**
Withdrawal	Third-party water	117.83	215.72
	of which from water stress area	61.24	87.03
	Surface water	0.15	-
	of which from water stress area	0.15	-
	Groundwater	0.97	**0.73**
	of which from water stress area	-	0.39
	Seawater	-	-
	of which from water stress area	-	-
	Total withdrawal	**118.96**	**216.45**
	of which from water stress area	**61.39**	**87.41**
Discharge	Third-party water	101.80	152.71
	of which to water stress area	55.72	51.69
	Surface water	4.77	-
	of which to water stress area	-	-
	Groundwater	1.02	-
	of which to water stress area	-	-
	Seawater	-	-
	of which to water stress area	-	-
	Total discharge	**107.59**	**152.71**
	of which to water stress area	**55.72**	**51.69**
Consumption	**Total consumption**	**11.37**	**63.74**
	of which from water stress area	**5.67**	**35.73**

1 To evaluate water consumption and its related impacts across all active locations in 2024 and 2025, data from smaller offices were estimated based on the average water consumption per square meter. Moreover, to map the water stress of the areas where these sites are located, Brightstar uses the Water Risk Atlas from the World Resources Institute.

Water Management in Lakeland

The Lakeland, Florida facility uses potable water for all purposes in the building, including production processes, and has implemented a water reduction program for cleaning printing equipment.

Since 2021, the site has transitioned to a laser Anilox cleaning system to improve the efficiency of washing printing equipment. This change significantly reduced the need for detergents and wastewater generation. The dust generated by the laser is collected and disposed of without water consumption. Due to the success of the initial system, Brightstar invested in a second unit in 2022. The Lakeland facility continues to use these laser Anilox cleaning systems.

Raw materials Consumption, Digitalization and Paperless Initiatives

GRI 3-3; GRI 301-1

Brightstar utilizes a broad spectrum of non-renewable materials in its operations, including raw metals and wood, semi-finished goods such as electronic components and assemblies, and other materials like cardboard, plastic, toner, and ink.

The production of lottery products involves significant material usage, particularly paper and inks, which contributes to the depletion of natural resources. To address this, Brightstar is actively working to increase its recovery and reuse of such materials, and advancing digitalization initiatives to further reduce material consumption.

As part of its evolving sustainability strategy, the Company is shifting toward using packaging materials designed to align with applicable PPWR requirements, further supporting responsible sourcing and efforts to reduce environmental impacts associated with packaging. In 2025, Brightstar engaged a third-party packaging design firm to develop a redesigned shipping carton for its primary point-of-sale terminals. The new solution is fully recyclable and is designed to optimize container utilization, with rollout planned for late 2026 shipments.

For the 2025 reporting year, Brightstar is not able to distinguish between renewable and non-renewable materials used.

Purchased Materials (Tons)		
Materials (tons)	**2024[1]**	**2025**
Paper (office paper, receipt rolls, marketing materials)	1,507.08	1,476.87
Paper (instant tickets, playslips, including holographic paper)	15,482.84	27,845.46
Cardboard	541.68	576.53
Toner and liquid inks	1,145.12	2,326.14
Plastic packaging	150.54	110.54
Plastic devices and printers cartridges components	739.72	1,360.31
Electronic devices components (assemblies, PCBs, monitors, bill acceptors, cables)	311.76	922.01
Wood	383.72	628.35
Metals	1,844.46	1,921.69
Other[2]	-	0.02
Total	**22,106.92**	**37,167.92**

1 The significant increase in purchased materials between 2024 and 2025 is mainly due to improved data quality and collection. In 2025, the availability of detailed data on the actual weights of purchased goods enabled a more accurate and representative calculation, resulting in higher reported values. This increase therefore reflects a methodological improvement rather than a real change in activity levels.
2 The "Other" category represents a residual grouping for which no sufficiently detailed data were available; therefore, it was estimated in 2025.

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Material Efficiency Initiatives in Gioco del Lotto Product Management

In Italy, games were initially launched with single-bet playslips and single-bet tickets. Over the years, Brightstar introduced several initiatives aimed at increasing the average ticket value by encouraging players to place multiple bets within a single ticket. In 2025, the Company specifically focused on boosting the adoption of 10eLotto multi-bet play through the introduction of a two-panel playslip and the phase-out of the single-panel version in Italy, without affecting the bet value. This required significant engagement with both customers and retailers to support a shift in long-standing play habits.

From a sustainability perspective, the Italian initiative delivered substantial results. In 2025 alone, 105 million fewer tickets were printed, corresponding to 87,000 hours saved in printing activity. The initiative also contributed to an overall reduction of approximately 70 tons of paper, 11,700 boxes of receipts, and associated logistics flows, further lowering the operation's environmental footprint. At the same time, the initiative supported a 1% increase in total wagers.

To support ongoing efforts to improve material efficiency, Brightstar promotes the use of multi-bet playslips and encourages players to complete Gioco del Lotto playslips digitally via the MyLotteries App. These initiatives form part of a broader strategy to improve material efficiency across Gioco del Lotto products in Italy, including the adoption of multi-bet formats designed to reduce the number of playslips and receipts required per transaction. Further development of these initiatives remains a focus area for 2026.

Resource Efficiency in Gratta e Vinci Product Management

In 2025, Brightstar in Italy relaunched the €3 Numeri Fortunati New ticket in a smaller format, preserving the gaming experience while optimizing the use of materials and inks, and the new ticket design has led to the saving of 800 kg of paper.

Ticket size optimization is systematically monitored through a dedicated KPI based on total ticket surface, enabling consistent tracking of improvements over time. This strategy aims to lottery ticket production and support lower impacts related to raw materials, packaging, logistics, and end-of-life waste, while preserving product functionality and player experience.



Optimizing Point-of-Sale Marketing Materials in Italy

In 2025, Brightstar enhanced its point-of-sale marketing materials to improve material efficiency and support its broader sustainability objectives. This initiative is structured around three core objectives:

- Introducing digital alternatives for in-store communication.
- Deploying branded, durable communication tools at retail locations.
- Reducing paper use and promoting the use of FSC-certified paper for printed materials.

All materials are made available free of charge through the retailer web portal, allowing retailers to request only what they need and supporting a more efficient, necessity-driven distribution model. To support the digitalization objective, Brightstar continued to expand its digital signage program, installing monitors at retail locations to provide real-time updates.

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Optimizing Print Media supporting Waste Reduction and Efficiency

Brightstar recently reviewed the production process for self-service vending machine cards and pack inserts. Historically, these items were printed on 18”x12” paper, limiting layout efficiency and often requiring outsourcing to external vendors. Following the review, Brightstar adjusted the paper size to 19”x13”, which increases the number of items printed per sheet from eight to 12, and improving overall production efficiency by approximately 50%.

Air Pollution Management and Mitigation
GRI 3-3; GRI 305-7

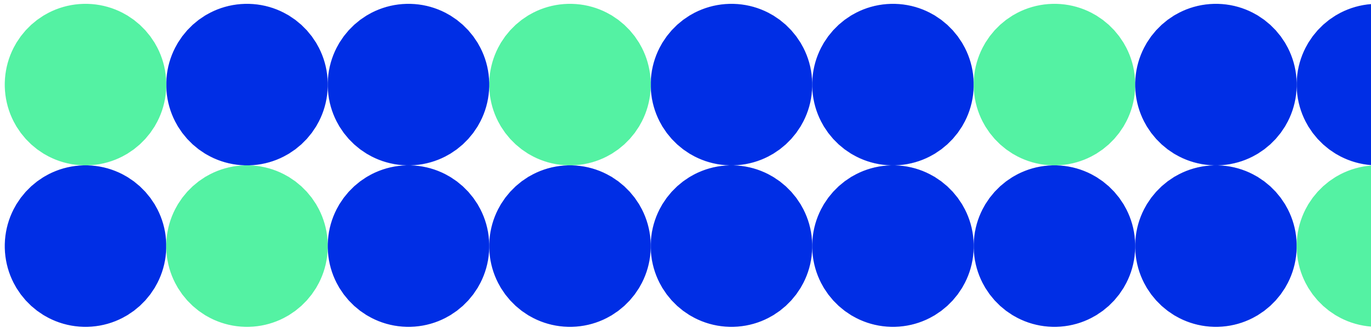
Pollutant emissions such as VOCs and HAPs are primarily generated at Brightstar’s printing facilities. These emissions can negatively affect air quality, with potential consequences for human health, such as respiratory and cardiovascular issues, developmental problems, cognitive decline, and increased mortality. They can also impact the environment through smog formation, acid rain, and water pollution.

Although Brightstar’s production processes do not result in significant levels of polluting emissions, both the Lakeland, Florida and Tito Scalo, Italy facilities have adopted consistent strategies to monitor compliance with applicable regulations and maintain emission levels below legal thresholds.

In 2025, VOC emissions from inks and cleaning agents at the Tito Scalo site remained significantly below the limits set by the Atmospheric Emissions Authorization. Similarly, the Lakeland facility continued to utilize water-based inks and plate manufacturing processes to reduce the release of VOCs and HAPs. The Lakeland facility continues to operate under a renewed Title V Air Permit, following a comprehensive resubmission process completed in 2025. By collaborating with leading experts, the site was able to comply with and surpass its emission reduction targets.

Pollutant[1]	2024	2025
	Quantity (tons)	Quantity (tons)
NOx	-	-
SOx	-	-
Persistent organic pollutants (POP)	-	-
Volatile organic compounds (VOC)	70.61	72.40
Hazardous air pollutants (HAP)	0.15	0.63
Particulate Matter (PM)	-	-
Others	-	-

1 The amount of pollutant emissions is based on site-specific data. For the Lakeland site, a monthly measurement is carried out, while, for the Tito Scalo site, emissions are calculated starting from an average hourly value of mass flow, multiplied by the operational hours of the machinery.



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Environmental Initiatives in Lakeland, Florida

Brightstar's Lakeland, Florida printing facility plays an important role in the Company's operations. The Company has implemented a series of targeted environmental initiatives aimed at improving operational efficiency and reducing environmental impacts associated with printing activities, including:

Environmental and Energy Management System:

- Maintenance of an EMS certified in accordance with the ISO 14001 standard.
- Achievement of the ISO 50001 certification for an Energy Management System.

Waste and Materials:

- Implementation of a recycling program for paper waste generated onsite.
- Donation of surplus paper to local schools to support educational and artistic activities.
- Exclusive use of paper sourced from FSC-certified suppliers.
- Certification as an FSC Chain of Custody facility by an independent third-party registrar.
- Recycling program for toner cartridges, by introducing a structured database to manage recyclable cartridges and enable bulk shipment, limiting landfilled waste while significantly improving operational efficiency.
- Use of an in-house ink color-matching and mixing center to reduce material waste, including ink waste and non-recyclable plastic pails.

Wastewater Generation:

- Use of two laser Anilox cleaning systems to improve the efficiency of printing equipment maintenance, significantly limiting wastewater generation.

Energy Efficiency and GHG Emissions Reduction

- Procurement of Guarantees of Origin to ensure that 30% of the electricity consumed at the site is sourced from renewable energy.
- Utilization of natural gas as primary energy source in 2025, with no diesel refueling required for the generator that operated only during weekly testing cycles, each lasting no more than five minutes.

Air Pollution:

- Adoption of water-based inks and plate manufacturing processes to minimize the release of VOCs and HAPs.



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Environmental Initiatives in Tito Scalo, Italy

In Italy, the Tito Scalo facility plays a central role in Brightstar's manufacturing operations, hosting both printing and device repair activities. A dedicated repair program is in place to extend the lifecycle of point-of-sale electronic devices, such as terminals and printers, with the site capable of restoring approximately 40,000 units annually.

Environmental initiatives aimed at improving sustainability performance at the Tito Scalo site include:

Environmental Management System:

- Implementation of an EMS certified in accordance with the ISO 14001 standard.

Energy efficiency and GHG Emissions Reduction:

- Procurement of Guarantees of Origin to ensure that 100% of the electricity consumed at the site is sourced from renewable energy.

Waste and Materials:

- Adoption of a policy aligned with the FSC Chain of Custody certification.
- Repurposing printing cartridge casings and spare components, which helps divert waste from landfills and supports a more circular approach to resource management.
- Salvaging and reusing spare parts from decommissioned or defective equipment, extending the lifecycle of components and reducing material waste.
- Support for refurbishment and circularity practices linked to the Italian Repair Center, with continued efforts to increase reuse and decrease waste throughout the hardware lifecycle.



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Resource Efficiency and Lottery Product Optimization Initiatives in Italy

The use of FSC-certified paper for instant tickets and Gioco del Lotto playslips and tickets supports responsible sourcing and is aligned with the use of certified forest-based materials. As part of its commitment to further reducing paper consumption, Brightstar promotes the use of multi-bet playslips and encourages digital participation in Gioco del Lotto via the MyLotteries App. This approach is part of a broader product optimization strategy in Italy, focused on improving material efficiency through the reduction of printed materials, increased digitalization, and the adoption of product formats designed to require fewer playslips and receipts.

To help reduce transportation-related impacts, the Company has streamlined logistics and optimized distribution of communication materials for both Gioco del Lotto and instant tickets. In addition, point-of-sale marketing materials in Italy are increasingly managed through a more necessity-driven and digitalized model, including the expansion of digital signage and the use of the retailer web portal to request only the materials needed. Instant tickets are manufactured using water-based inks and coatings, exclusively, which help limit the use of harmful substances. The energy used to print Gioco del Lotto playslips is derived entirely from certified renewable sources, contributing to lower market-based Scope 2 emission associated with production activities. Brightstar has introduced a recycling initiative for the plastic casings of printing cartridges, aiming to reduce waste and promote the reuse of materials that would otherwise have been discarded.

In 2025, Brightstar further strengthened this approach through specific product-related initiatives in Italy. For Gioco del Lotto products, the introduction of the 2-panel playslip for 10eLotto and the phase-out of the single-panel version helped reduce the number of tickets printed and the related paper use and logistics flows. For Gratta e Vinci, the relaunch of the €3 Numeri Fortunati New ticket in a smaller format contributed to lower paper consumption while preserving the gaming experience.

In 2025, Brightstar continued the MySelf project in Italy, which includes new customer service tools and processes to support remote diagnosis and reduce in-person dispatching. The project resulted in an optimized number of interventions completed by service technicians at the point of sale by increasing the effectiveness of remote troubleshooting via website and mobile app without field interventions. The initiative helped avoid approximately 2,000 field interventions, contributing to annual GHG emissions savings of around 10 tons of CO_2e. The success of the project led to new features that improved remote customer service. Retailers are now equipped to self-diagnose issues through self-service web portals that provide clear steps. New self-swap device procedures have been implemented to simplify the replacement of faulty components. Retailers are now able to identify certain equipment issues and perform approved component replacement procedures through self-service support tools. In 2025, over 30,000 retailers accessed e-learning modules covering both lottery-specific content and broader business development topics, including responsible gaming, sustainability, cybersecurity awareness, and store development strategies, supporting digital training models and reducing travel-related logistics requirements.

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Brightstar's Environmental Commitment Through European Lotteries Initiative

As a member of European Lotteries (EL), the leading association representing national lotteries across Europe, Brightstar has voluntarily joined the EL Environmental Initiative, a sector-wide call to action aimed at promoting the adoption of concrete environmental practices and fostering a collective transition towards more sustainable business models.

The initiative, launched by EL as part of its Sustainability Guidelines, aims to create a collective dynamic among members, encouraging collaboration and positioning the lottery sector as a leader in addressing environmental challenges. It follows a flexible and step-by-step approach, allowing members with different levels of maturity to progressively commit to one or more environmental actions.

Participation is entirely voluntary and represents a forward-looking commitment.

Brightstar formalized its participation by subscribing to the initiative's commitments, which focus on three key areas:

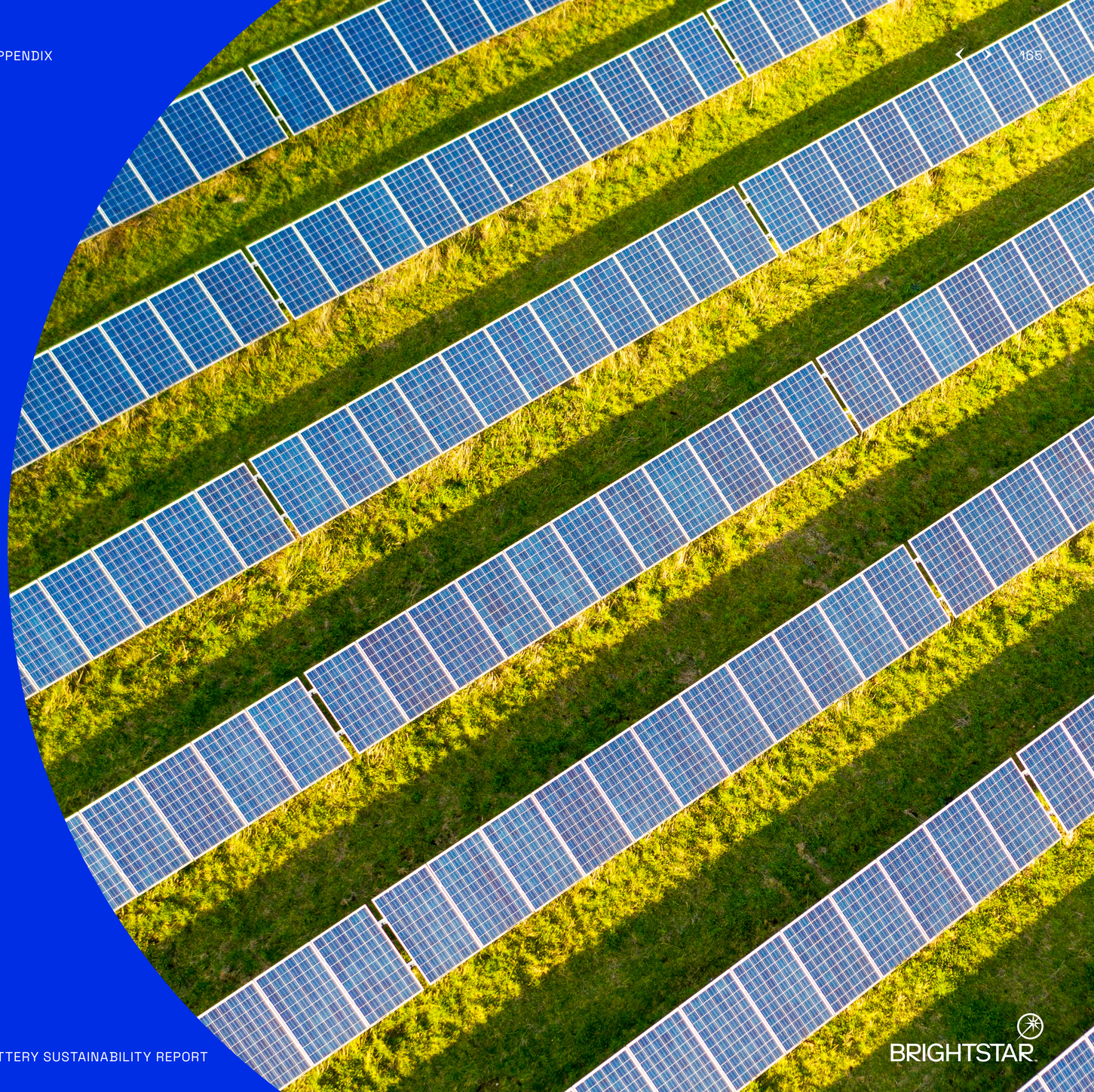
- Sustainable sourcing of materials: promotion of paper from certified sustainable forests (e.g., FSC, PEFC) for gaming materials, including scratch tickets.
- Monitoring of GHG emissions: periodic measurement and tracking of emissions associated with gaming activities, as a basis for improved environmental awareness and management.
- Reduction of GHG emissions: implementation of actions aimed at lowering the carbon footprint over time, including the definition and disclosure of 2030 emission reduction targets and the adoption of more sustainable practices (e.g., energy efficiency, renewable energy).

Through its participation, the Company contributes to a shared industry effort to address environmental challenges and support the transition towards a lower-carbon and more resource-efficient lottery sector.



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Appendix



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Social KPIs

GRI 2-1; GRI 2-7; GRI 2-8; GRI 401-1; GRI 403-9; GRI 403-10; GRI 404-1; GRI 404-3; GRI 405-1

Disclosure 2-7 Employees *						
Employees by employment contract, by gender	**2025**			**2024**		
	Men	**Women**	**Total**	**Men**	**Women**	**Total**
Permanent	3,858	1,912	5,770	3,985	1,990	5,975
Temporary	26	14	40	15	25	40
Non-guaranteed hours employees	0	0	0	0	0	0
Total	**3,884**	**1,926**	**5,810**	**4,000**	**2,015**	**6,015**



Employees by employment contract, by gender	2025 (Italy Only)		
	Men	**Women**	**Total**
Permanent	608	412	1,020
Temporary	0	0	0
Non-guaranteed hours employees	0	0	0
Total	**608**	**412**	**1,020**

* According to the GRI Standards 2021, interns were not included within Brightstar total workforce, but were considered in GRI disclosure 2-8. While, in the 2025 financial reports the data disclosed for Brightstar employees related to continuing operations (5,815) also encloses interns. Data are reported in headcount as of 31 December 2025.

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Employees by region, by employment contract	2025			
	Permanent	Temporary	Non-guaranteed hours	Total
United States	3,468	36	0	3,504
Italy	1,020	0	0	1,020
Canada	54	1	0	55
United Kingdom	137	0	0	137
Mexico	152	0	0	152
Poland	208	0	0	208
India	112	0	0	112
Spain	87	0	0	87
Jamaica	84	1	0	85
Chile	60	0	0	60
Trinidad and Tobago	86	0	0	86
Other Countries with less than 50 employees	302	2	0	304
Total	**5,770**	**40**	**0**	**5,810**

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Employees by region, by gender	2025			2024		
	Men	Women	Total	Men	Women	Total
United States	2,405	1,099	3,504	2,414	1,127	3,541
Italy	608	412	1,020	655	438	1,093
Canada	41	14	55	52	22	74
United Kingdom	77	60	137	91	67	158
Mexico	121	31	152	121	30	151
Poland	168	40	208	165	42	207
India	80	32	112	82	33	115
Spain	63	24	87	64	26	90
Jamaica	53	32	85	57	34	91
Chile	44	16	60	51	18	69
Trinidad and Tobago	42	44	86	41	43	84
Other Countries with less than 50 employees*	182	122	304	207	135	342
Total	**3,884**	**1,926**	**5,810**	**4,000**	**2,015**	**6,015**

* Other countries with less than 50 employees" category are included the following countries: Antigua and Barbuda, Anguilla, Argentina,Australia, Austria, Barbados, Belgium, Bulgaria, China, Colombia, Costa Rica, Czech Republic, Denmark, Dominican Republic, Estonia, Finland, France, Germany, Hungary, Ireland, Israel, Latvia, Luxembourg, Malaysia, Morocco, Netherlands, New Zealand, Peru, Portugal, Saint Kitts and Nevis, Serbia, Singapore, Sint Maarten, Slovakia, South Africa, Sweden, Switzerland, Taiwan, Turkey, Virgin Islands

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Employees by region, by employment type	2025		
	Full-time	Part-time	Total
United States	3,444	60	3,504
Italy	998	22	1,020
Canada	54	1	55
United Kingdom	137	0	137
Mexico	152	0	152
Poland	204	4	208
India	112	0	112
Spain	87	0	87
Jamaica	84	1	85
Chile	59	1	60
Trinidad and Tobago	86	0	86
Other Countries with less than 50 employees	303	1	304
Total	**5,720**	**90**	**5,810**

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Employees by employment type, by gender	2025			2024		
	Men	Women	Total	Men	Women	Total
Full-time	3,841	1,879	5,720	3,971	1,983	5,954
Part-time	43	47	90	29	32	61
Total	**3,884**	**1,926**	**5,810**	**4,000**	**2,015**	**6,015**



Employees by employment type, by gender	2025 (Italy Only)		
	Men	Women	Total
Full-time	605	393	998
Part-time	3	19	22
Total	**608**	**412**	**1,020**

Disclosure 2-8 Workers who are not employees*		
Workers who are not employees	**2025**	**2024**
Interns	5	10
Contingent workers	42	17
Total	**47**	**27**

* Contingent workers include italian staff leasing and Italian interim workers. Data are reported in headcount as of 31 December 2025.

Disclosure 401-1 New employee hires and employee turnover								
Age group	2025				2024			
	New Employee Hires		Employee Turnover		New Employee Hires		Employee Turnover	
	Number	Rate (%)	Number	Rate (%)	Number	Rate (%)	Number	Rate (%)
Up to 30	339	45.14	212	28.23	268	42.95	197	31.57
30-50	337	11.46	346	11.76	327	10.35	320	10.13
Over 50	109	5.15	431	20.35	77	3.45	153	6.85
Total	**785**	**13.51**	**989**	**17.02**	**672**	**11.17**	**670**	**11.14**



Age group	2025 (Italy Only)			
	New Employee Hires		Employee Turnover	
	Number	Rate (%)	Number	Rate (%)
Up to 30	14	32.56	2	4.65
30-50	18	3.54	20	3.93
Over 50	4	0.85	90	19.23
Total	**36**	**3.53**	**112**	**10.98**

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Region	2025				2024			
	New Employee Hires		Employee Turnover		New Employee Hires		Employee Turnover	
	Number	Rate (%)	Number	Rate (%)	Number	Rate (%)	Number	Rate (%)
United States	615	17.55	660	18.84	520	14.69	445	12.57
Italy	36	3.53	112	10.98	32	2.93	53	4.85
Canada	6	10.91	23	41.82	2	2.70	9	12.16
United Kingdom	9	6.57	28	20.44	11	6.96	18	11.39
Mexico	24	15.79	24	15.79	16	10.60	20	13.25
Poland	9	4.33	6	2.88	9	4.35	13	6.28
India	19	16.96	20	17.86	15	13.04	10	8.7
Spain	2	2.30	6	6.90	0	0	3	2.61
Jamaica	9	10.59	14	16.47	18	19.78	8	8.79
Chile	11	18.33	22	36.67	13	18.84	17	24.64
Trinidad and Tobago	12	13.95	10	11.63	12	14.29	8	9.52
Other Countries with less than 50 employees	33	10.86	64	21.05	24	7.02	66	19.3
Total	**785**	**13.51**	**989**	**17.02**	**672**	**11.17**	**670**	**11.14**

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Gender	2025				2024			
	New Employee Hires		Employee Turnover		New Employee Hires		Employee Turnover	
	Number	Rate (%)	Number	Rate (%)	Number	Rate (%)	Number	Rate (%)
Male	529	13.62	651	16.76	432	10.80	463	11.58
Female	256	13.29	338	17.55	240	11.91	207	10.27
Total	**785**	**13.51**	**989**	**17.02**	**672**	**11.17**	**670**	**11.14**



Gender	2025 (Italy Only)			
	New Employee Hires		Employee Turnover	
	Number	Rate (%)	Number	Rate (%)
Male	27	4.44	76	12.50
Female	9	2.18	36	8.74
Total	**36**	**3.53**	**112**	**10.98**

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Disclosure 404-1 Average hours of training per year per employee												
Professional Category	2025						2024					
	Total training hours			Average number of training hours			Total training hours			Average number of training hours		
	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Senior Management	1,202	613	1,815	5.0	5.2	5.1	2,667	1,837	4,505	10.7	15.2	12.1
Middle Management	6,415	2,988	9,403	10.6	10.1	10.4	10,817	5,561	16,378	17.3	18.1	17.6
Office staff and workers	223,628	19,973	243,601	73.6	13.2	53.5	194,152	25,519	219,671	31.6	16.1	46.6
Total	**231,245**	**23,575**	**254,820**	**59.5**	**12.2**	**43.9**	**207,636**	**32,918**	**240,554**	**51.9**	**16.3**	**40.0**

Professional Category	2025 (Italy Only)					
	Total training hours			Average number of training hours		
	Men	Women	Total	Men	Women	Total
Senior Management	447	273	721	10.9	12.4	11.4
Middle Management	2,637	2,198	4,835	18.8	22.9	20.5
Office staff and workers	6,695	6,578	13,273	15.7	22.4	18.4
Total	**9,779**	**9,049**	**18,828**	**16.1**	**22.0**	**18.5**

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Disclosure 404-3 Percentage of employees receiving regular performance and career development reviews*		
Percentage of total employees by gender and by employee category who received a regular performance and career development review during the reporting period	**2025**	
Category	**Men**	**Women**
Senior Management	100%	100%
Middle Management	100%	100%
Office staff and workers	100%	100%
Total	**100%**	**100%**

* The table covers 100% of the eligible employee population. Employees are considered eligible if they are permanent employees and have completed at least three months of service. In the 2025 reporting year, the eligible population represented 90% of the employees reported under GRI 2-7 as of 31 December 2025.

Disclosure 405-1 Diversity of governance bodies and employees												
Number of employees per employee category, gender and age group	**2025**											
	Up to 30			**30-50**			**Over 50**			**Total per Category**		
	Men	**Women**	**Total**	**Men**	**Women**	**Total**	**Men**	**Women**	**Total**	**Men**	**Women**	**Total**
Senior Management	1	0	1	82	53	135	157	64	221	240	117	357
Middle Management	12	3	15	343	174	517	250	119	369	605	296	901
Office staff and workers	508	227	735	1,524	765	2,289	1,007	521	1,528	3,039	1,513	4,552
Total	**521**	**230**	**751**	**1,949**	**992**	**2,941**	**1,414**	**704**	**2,118**	**3,884**	**1,926**	**5,810**
Number of employees per employee category, gender and age group	**2024**											
	Up to 30			**30-50**			**Over 50**			**Total per Category**		
	Men	**Women**	**Total**	**Men**	**Women**	**Total**	**Men**	**Women**	**Total**	**Men**	**Women**	**Total**
Senior Management	0	0	0	85	50	135	165	71	236	250	121	371
Middle Management	6	2	8	367	196	563	251	110	361	624	308	932
Office staff and workers	420	196	616	1,631	829	2,460	1,075	561	1,636	3,126	1,586	4,712
Total	**426**	**198**	**624**	**2,083**	**1,075**	**3,158**	**1,491**	**742**	**2,233**	**4,000**	**2,015**	**6,015**

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Percentage of employees per employee category, gender and age group	2025											
	Up to 30			30-50			Over 50			Total per Category		
	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Senior Management	0.02	0	0.02	1.41	0.91	2.32	2.70	1.10	3.80	4.13	2.01	6.14
Middle Management	0.21	0.05	0.26	5.90	2.99	8.90	4.30	2.05	6.35	10.41	5.09	15.51
Office staff and workers	8.74	3.91	12.65	26.23	13.17	39.40	17.33	8.97	26.30	52.31	26.04	78.35
Total	**8.97**	**3.96**	**12.93**	**33.55**	**17.07**	**50.62**	**24.34**	**12.12**	**36.45**	**66.85**	**33.15**	**100**

Percentage of employees per employee category, gender and age group	2024											
	Up to 30			30-50			Over 50			Total per Category		
	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Senior Management	0	0	0	1.41	0.83	2.24	2.74	1.18	3.92	4.16	2.01	6.17
Middle Management	0.1	0.03	0.13	6.1	3.26	9.36	4.17	1.83	6	10.37	5.12	15.49
Office staff and workers	6.98	3.26	10.24	27.12	13.78	40.9	17.87	9.33	27.2	51.97	26.37	78.34
Total	**7.08**	**3.29**	**10.37**	**34.63**	**17.87**	**52.5**	**24.79**	**12.34**	**37.12**	**66.5**	**33.5**	**100**

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Number of employees per employee category, gender and age group	2025 (Italy Only)											
	Up to 30			30-50			Over 50			Total per Category		
	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Senior Management	0	0	0	13	9	22	28	13	41	41	22	63
Middle Management	1	2	3	75	54	129	64	40	104	140	96	236
Office staff and workers	24	16	40	202	156	358	201	122	323	427	294	721
Total	**25**	**18**	**43**	**290**	**219**	**509**	**293**	**175**	**468**	**608**	**412**	**1,020**

Percentage of employees per employee category, gender and age group	2025 (Italy Only)											
	Up to 30			30-50			Over 50			Total per Category		
	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Senior Management	0	0	0	1.27	0.88	2.16	2.75	1.27	4.02	4.02	2.16	6.18
Middle Management	0.10	0.20	0.29	7.35	5.29	12.65	6.27	3.92	10.20	13.73	9.41	23.14
Office staff and workers	2.35	1.57	3.92	19.80	15.29	35.10	19.71	11.96	31.67	41.86	28.82	70.69
Total	**2.45**	**1.76**	**4.22**	**28.43**	**21.47**	**49.90**	**28.73**	**17.16**	**45.88**	**59.61**	**40.39**	**100**

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Number and percentage of individuals within the organization's governance bodies per gender and age group	2025							
	Up to 30		30-50		Over 50		Total per Category	
	Number	%	Number	%	Number	%	Number	%
Man	0	0	1	8.33	7	58.33	8	66.67
Woman	0	0	1	8.33	3	25	4	33.33
Other	0	0	0	0	0	0	0	0
Total	**0**	**0**	**2**	**16.67**	**10**	**83.33**	**12**	**100**

Number and percentage of individuals within the organization's governance bodies per gender and age group	2024							
	Up to 30		30-50		Over 50		Total per Category	
	Number	%	Number	%	Number	%	Number	%
Man	0	0	1	8.33	7	58.33	8	66.67
Woman	0	0	1	8.33	3	25	4	33.33
Other	0	0	0	0	0	0	0	0
Total	**0**	**0**	**2**	**16.67**	**10**	**83.33**	**12**	**100**

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Disclosure 403-9 Work-related injuries[1]		
	2025	2024
	US	
Number of fatalities as a result of work-related injury	0	0
Number of high-consequence work-related injuries (excluding fatalities)	0	0
Number of recordable work-related injuries	46	65
Rate of fatalities as a result of work-related injury (%)	0	0
Rate of high-consequence work-related injuries (excluding fatalities) (%)	0	0
Rate of recordable work-related injuries (%)	1.21	2.20
Hours worked	7,602,728	5,912,424

1 In the US and Italy, the main causes of occupational injuries include the handling and movement of operational equipment and loads, malfunctions or failures of equipment safety mechanisms, and, falls from stairs. Rates have been calculated based on 200,000 hours worked.

	2025	2024
	Italy	
Number of fatalities as a result of work-related injury	0	0
Number of high-consequence work-related injuries (excluding fatalities)	0	0
Number of recordable work-related injuries	1	1
Rate of fatalities as a result of work-related injury (%)	0	0
Rate of high-consequence work-related injuries (excluding fatalities) (%)	0	0
Rate of recordable work-related injuries (%)	0.13	0.1
Hours worked	1,594,175.38	1,680,925

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	2025	2024
	Rest of the world	
Number of fatalities as a result of work-related injury	0	0
Number of high-consequence work-related injuries (excluding fatalities)	0	0
Number of recordable work-related injuries	2	8
Rate of fatalities as a result of work-related injury (%)	0	0
Rate of high-consequence work-related injuries (excluding fatalities) (%)	0	0
Rate of recordable work-related injuries (%)	0.2	0.3
Hours worked	2,441,815	4,706,478

	2025	2024
	Total	
Number of fatalities as a result of work-related injury	0	0
Number of high-consequence work-related injuries (excluding fatalities)	0	0
Number of recordable work-related injuries	49	74
Rate of fatalities as a result of work-related injury (%)	0	0
Rate of high-consequence work-related injuries (excluding fatalities) (%)	0	0
Rate of recordable work-related injuries (%)	0.84	1.20
Hours worked	11,638,718	12,299,827.4

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2025 Workers who are not employees	
Total	
Number of fatalities as a result of work-related injury	0
Number of high-consequence work-related injuries (excluding fatalities)	0
Number of recordable work-related injuries	0
Rate of fatalities as a result of work-related injury (%)	0
Rate of high-consequence work-related injuries (excluding fatalities) (%)	0
Rate of recordable work-related injuries (%)	0
Hours worked	67,564.55

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Disclosure 403-10 Work-related ill health	
2025	
Total	
Number of fatalities as a result of work-related ill health	0
The number of cases of recordable work-related ill health	0
The main types of work-related ill health	0

2025 Workers who are not employees	
Total	
Number of fatalities as a result of work-related ill health	0
The number of cases of recordable work-related ill health	0
The main types of work-related ill health	0

ADDITIONAL KPIs		
Share of women in total workforce (as % of total workforce)	**2025**	**2024**
Total workforce	5,810	6,015
Number of women in total workforce	1,926	2,015
Share of women in total workforce	**33.15%**	**33.5%**

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Share of women in STEM-related positions* as % of total STEM positions	2025	2024
Total number of employees in STEM-related positions	1,045	1,835
Number of women in STEM-related positions	219	374
Share of women in STEM-related positions (as % of total STEM positions)	**20.96%**	**20.38%**

* The job functions considered for the STEM-related positions are CTO Lottery, Global Infrastructure & Italy Technology

Share of women in management positions in revenue-generating functions* as % of all such managers	2025	2024
Total number of employees in management positions in revenue-generating functions	503	650
Number of women in management positions in revenue-generating functions	188	237
Share of women in management positions in revenue-generating functions (e.g. sales) as % of all such managers	**37.38%**	**36.46%**

* The job functions considered for the revenue-generating functions are Global iLOttery, Global Lottery, International Lottery, Italy Lottery, Marketing product and sales development, MC&S, North America Lottery, Play Lottery, US & Canada Lottery

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2025 US only							
Workforce Breakdown: Race/ Ethnicity - US only	**Senior Management**	**Middle Management**	**Office Staff & Workers**	**Total Employees**	**Share in total workforce (%)**	**Employees in all management positions**	**Share in all management positions (%)**
Total number of employees	**218**	**427**	**2,859**	**3,504**	**100%**	**645**	**100%**
White	183	314	1,701	2,198	63%	497	77%
People of Color	**33**	**109**	**716**	**858**	**24.49%**	**142**	**22%**
Hispanic or Latino	15	51	504	570	16%	66	10%
Asian	8	23	192	223	6%	31	5%
Black or African American	10	35	10	55	2%	45	7%
Indigenous or Native	0	0	10	10	0%	0	0%
Other	2	4	98	104	3%	6	1%
% of PoC	**15.14%**	**25.53%**	**25.04%**	**24.49%**	**24.49%**	**22.02%**	**22.02%**

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New Hires Breakdown: Race/ Ethnicity	2025 US only		
	Men	Women	Total
White	219	85	304
People of Color	**200**	**111**	**311**
Hispanic or Latino	75	43	118
Asian	36	14	50
Black or African American	62	36	98
Indigenous or Native	2	0	2
Other	**25**	**18**	**43**
Total	**419**	**196**	**615**

New Employee hires per professional category	2025		
	Men	Women	Total
Senior Management	12	7	19
Middle Management	26	8	34
Office staff and workers	491	241	732
Total	**529**	**256**	**785**

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OTHER KPIs		
	2025	**2024**
Total number of new employee hires	785	672
Percentage of open positions filled by internal candidates (internal hires)	26%	76%

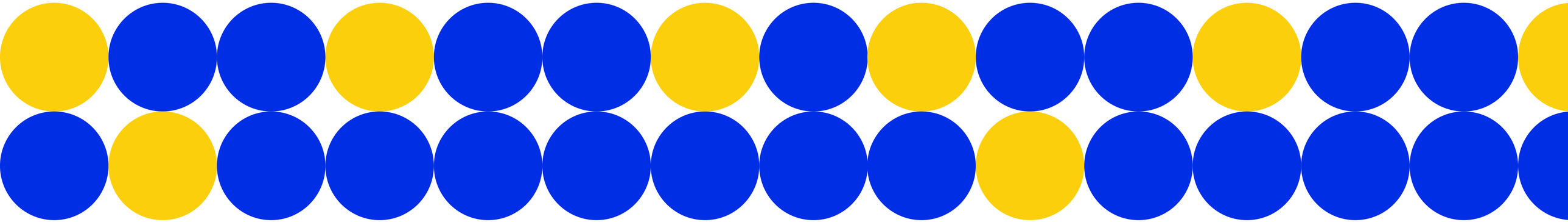
	2025	**2024**
Percentage of promotions happening inside the company	8.6%	13.3%

Percentage of completion of training courses provided	**2025**
Business ethics	96%
Anti-Corruption	95%
Anti-Money Laundering	68%
Culture and inclusion	63%
Discrimination & Harassment	95%
Human Rights	91%
Cybersecurity	98%
Health & Safety (Italy Only)	97%

*The percentage of completion for each topic was calculated by conducting an arithmetic average of the percentages of completion for the individual courses taken.

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	2025
Days lost due to work-related injuries	981



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Independent Auditors' Report
GRI 2-5

forvis mazars

Brightstar Lottery PLC

Independent auditor's report on the Sustainability Report

Sustainability Report's period closing as of December 31st, 2025

MLMR/LVRR/ctro – R202601163

Via Ceresio, 7
20154 Milano
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Independent auditor's report on the Sustainability Report

To the Board of Directors of Brightstar Lottery PLC

We have carried out a *limited assurance engagement* on the Sustainability Report of Brightstar Lottery Group (hereinafter also the "Group") as of December 31st, 2025.

Responsibility of the Directors for the Sustainability Report

The Directors of Brightstar Lottery PLC are responsible for the preparation of the Sustainability Report in accordance with the *"Global Reporting Initiative Sustainability Reporting Standards"* issued by *GRI - Global Reporting Initiative ("GRI Standards")*, as illustrated in the paragraph "*Methodological note*" of the Sustainability Report.

The Directors are also responsible for such internal control as they determine is necessary to enable the preparation of the Sustainability Report that is free from material misstatement, whether due to fraud or error.

The Directors are also responsible for the definition of Group's objectives in relation to the sustainability performance, as well as for identifying its stakeholders and material topics to be reported on.

Auditor's Independence and quality control

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code) issued by the International Ethics Standards Board for Accountants, based on fundamental principles of integrity, objectivity, competence and professional diligence, confidentiality and professional behavior.

Our audit firm applies *International Standard on Quality Management 1 (ISQM Italia 1)*, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Auditor's responsibility

Our responsibility is to express our conclusion based on the procedures performed about the compliance of the Sustainability Report with the GRI Standards. We conducted our work in accordance with the criteria established in the *"International Standard on Assurance Engagements ISAE 3000 (Revised) – Assurance Engagements Other than Audits or Reviews of Historical Financial Information"* (hereinafter "ISAE 3000 *Revised*"), issued by the *International Auditing and Assurance Standards Board (IAASB)* for *limited assurance* engagements. The standard requires that we plan and perform the engagement to obtain limited assurance whether the Sustainability Report is free from material misstatement.

Therefore, the procedures performed in a limited assurance engagement are less than those performed in a reasonable assurance engagement in accordance with ISAE 3000 Revised, and, therefore, do not enable us to obtain assurance that we would become aware of all significant matters and events that might be identified in a reasonable assurance engagement.

The procedures performed on the Sustainability Report are based on our professional judgement and included inquiries, primarily with personnel of the Group responsible for the preparation of information included in the Sustainability Report, analysis of documents, recalculations and other procedures aimed at obtaining evidence as appropriate.

Specifically, we carried out the following procedures:

1) analysis of the process relating to the definition of material aspects disclosed in the Sustainability Report, with reference to the methods of analysis and understanding of the reference context, identification, evaluation and prioritization of the actual and potential impacts and the internal validation of the results of the process;
2) comparison between the economic and financial data and information included in

   the Sustainability Report with those included in the Group's Annual Report pursuant to section 13 or 15 (d) of the Securities Exchange Act of 1934 for the fiscal year ended on December 31st, 2025 and the UK Group's Annual Report and Accounts for the fiscal year ended on December 31st, 2025;
3) understanding of the processes underlying the origination, recording and management of qualitative and quantitative material information included in the Sustainability Report.

In particular, we carried out interviews and discussions with the management personnel of Brightstar Lottery PLC and with personnel of the main legal entities of the Group and we carried out limited documentary verifications, in order to gather information about the processes and procedures, which support the collection, aggregation, elaboration and transmittal of qualitative and quantitative data to the department responsible for the preparation of the Sustainability Report.

In addition, for material information, taking into consideration the Group's activities and characteristics:

a) with regards to qualitative information included in the Sustainability Report, we carried out interviews and gathered supporting documentation in order to verify its consistency with the available evidence;
b) with regards to quantitative information, we carried out both analytical procedures and limited verifications in order to ensure, on a sample basis, the correct aggregation of data and on the calculation criteria and methodologies used.

Conclusions

Based on the work performed, nothing has come to our attention that causes us to believe that the Sustainability Report of Brightstar Lottery Group as of December 31st, 2025, is not prepared, in all material aspects, in accordance with the GRI Standards as stated in the paragraph "*Methodological Note*" of the Sustainability Report.

Other matters

The Sustainability Report for the year ended December 31st, 2024, information from which is presented for comparative purposes, was subject to a limited assurance engagement performed by another auditor who expressed an unmodified conclusion thereon dated November 17th, 2025.

The Sustainability Report contains information not referenced to the GRI Standards and the financial materiality assessment conducted by the Group. Our limited assurance conclusions do not extend to this information.

This report is not issued pursuant to law, given that the Company is not obliged to prepare the sustainability report.

Milan, July 13th, 2026

Forvis Mazars S.p.A.

Marco Lumeridi
Partner - Certified Auditor

Laura Verrascina
Certified Auditor

GRI Content Index

Statement of use	Brightstar Lottery PLC has reported the information cited in this GRI content index for the period 01.01.2025 - 31.12.2025 with reference to the GRI Standards.
GRI 1 used	GRI 1: Foundation 2021

GRI STANDARD	DISCLOSURE	LOCATION	OMISSION			DIRECT ANSWER AND/OR NOTES
			REQUIREMENTS / OMITTED	REASONS	EXPLANATION	
General Disclosures						
GRI 2: General Disclosures 2021	2-1 Organizational details	About Brightstar - Company Profile - pg.12-14 Appendix - Social KPIs - pg. 172 Please refer to the 2025 UK Annual Report - pg 149-154				
	2-2 Entities included in the organization's sustainability reporting	Methodological Note - Report Profile - pg. 6-7 Please refer to the 2025 UK Annual Report - pg 149-154				
	2-3 Reporting period. frequency and contact point	Methodological Note - Report Profile - pg. 6-7				
	2-4 Restatements of information	Methodological Note - Report Profile - pg. 6-7				
	2-5 External assurance	Methodological Note - Report Profile - pg. 6-7 Independent Auditors' Report - pg. 189-190				
	2-6 Activities. value chain and other business relationships	About Brightstar Lottery - Company Profile - pg.12-14 Sustainable Growth - Stakeholder Engagement - pg.65-67 Sustainable Growth - Sustainable Procurement - pg.131-138				
	2-7 Employees	Appendix - Social KPIs - pg. 166-170				

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GRI STANDARD	DISCLOSURE	LOCATION	OMISSION			DIRECT ANSWER AND/OR NOTES
			REQUIREMENTS / OMITTED	REASONS	EXPLANATION	
General Disclosures						
GRI 2: General Disclosures 2021	2-8 Workers who are not employees	Appendix - Social KPIs - pg. 170				
	2-9 Governance structure and composition	Governance and Business Integrity - Corporate Governance - pg. 34-35 Governance and Business Integrity - Sustainability Governance - pg. 36-37				
	2-10 Nomination and selection of the highest governance body	Governance and Business Integrity - Corporate Governance - pg. 34-35 Please refer to the Brightstar Lottery Corporate Governance Guidelines				
	2-11 Chair of the highest governance body	Governance and Business Integrity - Corporate Governance - pg. 34-35 Please refer to the 2025 UK Annual Report - pg.46-47 and to Governance section of the corporate web site				
	2-12 Role of the highest governance body in overseeing the management of impacts	Methodological Note - Identifying Sustainable Material Aspects - pg. 8-10 Governance and Business Integrity - Corporate Governance - pg. 34-35 Please refer to the Brightstar Lottery ESG Documentation				
	2-13 Delegation of responsibility for managing impacts	Governance and Business Integrity - Corporate Governance - pg. 34-35 Governance and Business Integrity - Sustainability Governance - pg. 36-37				
	2-14 Role of the highest governance body in sustainability reporting	Governance and Business Integrity - Corporate Governance - pg. 34-35 Governance and Business Integrity - Sustainability Governance - pg. 36-37				
	2-15 Conflicts of interest	Governance and Business Integrity - Operating with Integrity - pg. 37-41				
	2-16 Communication of critical concerns	Governance and Business Integrity - Operating with Integrity - pg. 37-41				
	2-17 Collective knowledge of the highest governance body	Governance and Business Integrity - Corporate Governance - pg. 34-35				

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GRI STANDARD	DISCLOSURE	LOCATION	OMISSION			DIRECT ANSWER AND/OR NOTES
			REQUIREMENTS / OMITTED	REASONS	EXPLANATION	
General Disclosures						
GRI 2: General Disclosures 2021	2-18 Evaluation of the performance of the highest governance body	Governance and Business Integrity - Corporate Governance - pg. 34-35 Please refer to the 2025 UK Annual Report - pg. 59-61				
	2-19 Remuneration policies	Please refer to the 2025 UK Annual Report - pg. 63-73				
	2-20 Process to determine remuneration	Please refer to the 2025 UK Annual Report - pg. 91-93 and Brightstar 2025 AGM Results 2025				
	2-21 Annual total compensation ratio		2-21	Confidentiality constraint	Brightstar cannot disclose the data related to the annual total compensation ratio, due to confidentiality constraints	
	2-22 Statement on sustainable development strategy	Letter from the Executive Chair and Chief Executive Officer - pg.3,4 Sustainable Growth - Corporate Values and the 2030 Agenda - pg.62-64 Sustainable Growth - Sustainability Plan - pg.68,69				
	2-23 Policy commitments	Governance and Business Integrity - Operating with Integrity - pg.37-41 Sustainable Growth - Employee Engagement - pg.70-80 Sustainable Growth - Human Rights - pg.81-96 Sustainable Growth - Responsible Gaming - pg.97-104 Sustainable Growth - Community Engagement - pg.105-130 Sustainable Growth - Sustainable Procurement - pg.131-138 Sustainable Growth - Climate Action, Biodiversity and Circularity - pg.139-164				
	2-24 Embedding policy commitments	Governance and Business Integrity - Operating with Integrity - pg.37-41 Sustainable Growth - Employee Engagement - pg.70-80 Sustainable Growth - Human Rights - pg.81-96 Sustainable Growth - Responsible Gaming - pg.97-104 Sustainable Growth - Community Engagement - pg.105-130 Sustainable Growth - Sustainable Procurement - pg.131-138 Sustainable Growth - Climate Action, Biodiversity and Circularity - pg.139-164				
	2-25 Processes to remediate negative impacts	Governance and Business Integrity - Operating with Integrity - pg.37-41 Governance and Business Integrity - Protecting, People, Products, and Processes - pg.42-60 Sustainable Growth - Human Rights - pg.81-96				
	2-26 Mechanisms for seeking advice and raising concerns	Governance and Business Integrity - Operating with Integrity - pg.37-41				

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GRI STANDARD	DISCLOSURE	LOCATION	OMISSION			DIRECT ANSWER AND/OR NOTES
			REQUIREMENTS / OMITTED	REASONS	EXPLANATION	
General Disclosures						
GRI 2: General Disclosures 2021	2-27 Compliance with laws and regulations					During 2025 there were no instances of non compliance with laws and legislation
	2-28 Membership associations	Sustainable Growth - Corporate Values and the 2030 Agenda - pg.62-64 Sustainable Growth - Stakeholder Engagement - pg.65-67 Sustainable Growth - Sustainability Plan - pg.68,69				
	2-29 Approach to stakeholder engagement	Sustainable Growth - Stakeholder Engagement - pg.65-67				
	2-30 Collective bargaining agreements	Sustainable Growth - Human Rights - pg.96				The data is available only with reference to the Italian perimeter. Collective agreements are available in only a few other countries where Brightstar operates. In this first year of reporting with the new scope, it was not possible to collect all the data.
Material Topics						
GRI 3: Material topics 2021	3-1 Process to determine Material Topics	Methodological Note - Identifying Sustainable Material Aspects - pg.8-10				
	3-2 List of Material Topics	Methodological Note - Identifying Sustainable Material Aspects - pg.8-10				
Material topic: Supporting good causes through lottery revenues						
GRI 3: Material topics 2021	3-3 Management of Material Topics	Methodological Note - Identifying Sustainable Material Aspects - pg.8-10 About Brightstar Lottery - Direct Economic Value Generated and Distributed - pg.15 Governance and Business Integrity - Sustainability Governance - pg.36,37				
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	About Brightstar Lottery - Direct Economic Value Generated and Distributed - pg.15				

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GRI STANDARD	DISCLOSURE	LOCATION	OMISSION			DIRECT ANSWER AND/OR NOTES
			REQUIREMENTS / OMITTED	REASONS	EXPLANATION	
Material topic: Business Ethics						
GRI 3: Material topics 2021	3-3 Management of Material Topics	Methodological Note - Identifying Sustainable Material Aspects - pg.8-10 Governance and Business Integrity - Sustainability Governance - pg.36,37 Governance and Business Integrity - Operating with Integrity - pg.37-41				
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption		205-1	Information unavailable	Brightstar cannot disclose the information required as data on operations assessed for risks related to corruption are not systematically tracked at Group level.	
	205-2 Communication and training about anti-corruption policies and procedures		205-2	Information unavailable	Brightstar cannot disclose the information required as data on communication and training about anti-corruption policies and procedures are not systematically tracked at Group level.	
	205-3 Confirmed incidents of corruption and actions taken					During 2025 there were no cases of corruption within the Brightstar Group
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices					During 2025 there were no cases of legal actions or cases reported internally for anticompetitive behavior, anti-trust, and monopoly practices within the Brightstar Group

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GRI STANDARD	DISCLOSURE	LOCATION	OMISSION			DIRECT ANSWER AND/OR NOTES
			REQUIREMENTS / OMITTED	REASONS	EXPLANATION	
Material topic: Business Ethics						
GRI 415: Public Policy 2016	415-1 Political contributions					During the year ended December 31, 2025, subsidiaries of the Parent made various forms of contributions (i.e. political where permissible), charitable donations, membership dues, and sponsorships) to entities in the U.S. including various U.S. embassies (located in Barbados and the Eastern Caribbean, Trinidad & Tobago, and the Dominican Republic) and other non-U.S. sponsorship events that have charitable, social welfare, trade and business sector, or political affiliations and missions. Some of these organizations and entities have affiliations with government officials. These non-U.K. contributions totaled $2.4 million (2024: $1.8 million). The Company has complied with jurisdictional reporting requirements for these contributions and all such contributions are permissible under applicable laws. Please refer to the 2025 UK Annual Report and Accounts (pg 57).

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Material topic: Raw Materials Consumption						
GRI 3: Material topics 2021	3-3 Management of Material Topics	Methodological Note - Identifying Sustainable Material Aspects - pg.8-10 Governance and Business Integrity - Sustainability Governance - pg.36,37 Sustainable Growth - Raw materials Consumption, Digitalization and Paperless Initiatives - pg.157-159				
GRI 301: Materials 2016	301-1 Materials used by weight or volume	Sustainable Growth - Raw materials Consumption, Digitalization and Paperless Initiatives - pg.157-159				
	301-2 Recycled input materials used		301-2	Information unavailable	Brightstar cannot disclose the information required as data on recycled input materials purchased is not systematically tracked at Group level.	

GRI STANDARD	DISCLOSURE	LOCATION	OMISSION			DIRECT ANSWER AND/OR NOTES
			REQUIREMENTS / OMITTED	REASONS	EXPLANATION	
Material topic: Climate Change						
GRI 3: Material topics 2021	3-3 Management of Material Topics	Methodological Note - Identifying Sustainable Material Aspects - pg.8-10 Governance and Business Integrity - Sustainability Governance - pg.36,37 Sustainable Growth - Climate Change - pg.143-152				
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Sustainable Growth - Climate Change - pg.143-152				
	302-3 Energy intensity	Sustainable Growth - Climate Change - pg.143-152				
	302-4 Reduction of energy consumption	Sustainable Growth - Climate Change - pg.143-152				
	302-5 Reductions in energy requirements of products and services		302-5	Information unavailable	Brightstar cannot disclose the information required as data on reductions in energy requirements of products and services are not systematically tracked at Group level.	
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Sustainable Growth - Climate Change - pg.143-152				
	305-2 Energy indirect (Scope 2) GHG emissions	Sustainable Growth - Climate Change - pg.143-152				
	305-3 Other indirect (Scope 3) GHG emissions	Sustainable Growth - Climate Change - pg.143-152				
	305-4 GHG emissions intensity	Sustainable Growth - Climate Change - pg.143-152				
	305-5 Reduction of GHG emissions	Sustainable Growth - Climate Change - pg.143-152				

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GRI STANDARD	DISCLOSURE	LOCATION	OMISSION			DIRECT ANSWER AND/OR NOTES
			REQUIREMENTS / OMITTED	REASONS	EXPLANATION	
Material topic: Water resources						
GRI 3: Material topics 2021	3-3 Management of Material Topics	Methodological Note - Identifying Sustainable Material Aspects - pg.8-10 Governance and Business Integrity - Sustainability Governance - pg.36,37 Sustainable Growth - Water Resources - pg.156,157				
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	Methodological Note - Identifying Sustainable Material Aspects pg. 8-10 Sustainable Growth - Water Resources - pg.156,157				
	303-2 Management of water discharge-related impacts	Sustainable Growth - Water Resources - pg.156,157				
	303-3 Water withdrawal	Sustainable Growth - Water Resources - pg.156,157				
	303-4 Water discharge	Sustainable Growth - Water Resources - pg.156,157				
	303-5 Water consumption	Sustainable Growth - Water Resources - pg.156,157				
Material topic: Biodiversity						
GRI 3: Material topics 2021	3-3 Management of Material Topics	Methodological Note - Identifying Sustainable Material Aspects - pg.8-10 Governance and Business Integrity - Sustainability Governance - pg.36,37 Sustainable Growth - Biodiversity - pg.153-154				
GRI 101: Biodiversity 2024	101-1 Policies to halt and reverse biodiversity loss	Sustainable Growth - Biodiversity - pg.153-154				
	101-2 Management of biodiversity impacts	Sustainable Growth - Biodiversity - pg.153-154				
	101-4 Identification of biodiversity impacts	Sustainable Growth - Biodiversity - pg.153-154				

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GRI STANDARD	DISCLOSURE	LOCATION	OMISSION			DIRECT ANSWER AND/OR NOTES
			REQUIREMENTS / OMITTED	REASONS	EXPLANATION	
Material topic: Air pollution						
GRI 3: Material topics 2021	3-3 Management of Material Topics	Methodological Note - Identifying Sustainable Material Aspects - pg.8-10 Governance and Business Integrity - Sustainability Governance - pg.36,37 Sustainable Growth - Air Pollution Management and Mitigation - pg.160				
GRI 305: Emissions 2016	305-7 Nitrogen oxides (NOx). sulfur oxides (SOx). and other significant air emissions	Sustainable Growth - Air Pollution Management and Mitigation - pg.160				
Material topic: Waste and product end of life						
GRI 3: Material topics 2021	3-3 Management of Material Topics	Methodological Note - Identifying Sustainable Material Aspects - pg.8-10 Governance and Business Integrity - Sustainability Governance - pg.36,37 Sustainable Growth - Waste Management - pg.155,156				
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Sustainable Growth - Waste Management - pg.155, 156				
	306-2 Management of significant waste-related impacts	Sustainable Growth - Waste Management - pg.155, 156				
	306-3 Waste generated	Sustainable Growth - Waste Management - pg.155, 156				
	306-4 Waste diverted from disposal	Sustainable Growth - Waste Management - pg.155, 156				
	306-5 Waste directed to disposal	Sustainable Growth - Waste Management - pg.155, 156				

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GRI STANDARD	DISCLOSURE	LOCATION	OMISSION			DIRECT ANSWER AND/OR NOTES
			REQUIREMENTS / OMITTED	REASONS	EXPLANATION	
Material topic: Workplace health and safety						
GRI 3: Material topics 2021	3-3 Management of Material Topics	Methodological Note - Identifying Sustainable Material Aspects - pg.8-10 Governance and Business Integrity - Sustainability Governance - pg.36,37 Sustainable Growth - Human Rights - pg.81-96 Sustainable Growth - Sustainable Procurement - pg.131-138				
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Sustainable Growth - Human Rights - pg.81-96				
	403-2 Hazard identification, risk assessment, and incident investigation	Sustainable Growth - Human Rights - pg.81-96				
	403-3 Occupational health services	Sustainable Growth - Human Rights - pg.81-96				
	403-4 Worker participation, consultation, and communication on occupational health and safety	Sustainable Growth - Human Rights - pg.81-96				
	403-5 Worker training on occupational health and safety	Sustainable Growth - Human Rights - pg.81-96				
	403-6 Promotion of worker health	Sustainable Growth - Human Rights - pg.81-96				
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Sustainable Growth - Human Rights - pg.81-96 Sustainable Growth - Sustainable Procurement - pg.131-138				
	403-8 Workers covered by an occupational health and safety management system		403-8	Information unavailable	Brightstar cannot disclose the information required as data on employees and workers who are not employees covered by an occupational health and safety management system are not systematically tracked at Group level.	

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GRI STANDARD	DISCLOSURE	LOCATION	OMISSION			DIRECT ANSWER AND/OR NOTES
			REQUIREMENTS / OMITTED	REASONS	EXPLANATION	
Material topic: Workplace health and safety						
GRI 403: Occupational Health and Safety 2018	403-9 Work-related injuries	Appendix - Social KPIs - pg.180-182				
	403-10 Work-related ill health	Appendix - Social KPIs - pg.183	403-10-c	Information incomplete	Brightstar cannot disclose the information required as data on workplace hazards that, if not controlled, pose a risk of occupational illness, are not systematically tracked at Group level.	
Material topic: Human and labour rights						
GRI 3: Material topics 2021	3-3 Management of Material Topics	Methodological Note - Identifying Sustainable Material Aspects - pg.8-10 Governance and Business Integrity - Sustainability Governance - pg.36,37 Sustainable Growth - Human Rights - pg.81-96 Sustainable Growth - Sustainable Procurement - pg.131-138				
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Appendix - Social KPIs - pg.171-173				
	401-2 Benefits provided to full-time employees that are not provided to temporary or part time employees		401-2	Information unavailable	Brightstar cannot disclose the information required as data on benefits provided to full-time employees that are not provided to temporary or part time employees are not systematically tracked at Group level.	

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GRI STANDARD	DISCLOSURE	LOCATION	OMISSION			DIRECT ANSWER AND/OR NOTES
			REQUIREMENTS / OMITTED	REASONS	EXPLANATION	
Material topic: Human and labour rights						
GRI 401: Employment 2016	401-3 Parental leave		401-3	Information unavailable	Brightstar cannot disclose the information required as data on employees entitled to and who have taken parental leave, including return-to-work rates, are not systematically tracked at Group level.	
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Appendix - Social KPIs - pg.176-179				
	405-2 Ratio of basic salary and remuneration of women to men		401-2	Confidentiality constraint	Brightstar cannot disclose the data related to ratio of women's to men's base salary and total remuneration, for each employee category, due to confidentiality constraints	
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken					During 2025 there were no confirmed cases of discrimination within Brightstar Lottery communicated via the Integrity Line and the email address compliance@brightstar.com

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GRI STANDARD	DISCLOSURE	LOCATION	OMISSION			DIRECT ANSWER AND/OR NOTES
			REQUIREMENTS / OMITTED	REASONS	EXPLANATION	
Material topic: Human and labour rights						
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	Sustainable Growth - Human Rights - pg.81-96 Sustainable Growth - Sustainable Procurement - pg.131-138	408-1-a-b	Information incomplete	Brightstar cannot disclose the information required as data on operations and suppliers at significant risk for incidents of child labor, are not systematically tracked at Group level.	
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Sustainable Growth - Human Rights - pg.81-96 Sustainable Growth - Sustainable Procurement - pg.131-138	409-1-a-b	Information incomplete	Brightstar cannot disclose the information required as data on operations and suppliers at significant risk for incidents of forced or compulsory labor, are not systematically tracked at Group level.	
Material topic: Customer Privacy and security						
GRI 3: Material topics 2021	3-3 Management of Material Topics	Methodological Note - Identifying Sustainable Material Aspects - pg.8-10 Governance and Business Integrity - Sustainability Governance - pg.36,37 Governance and Business Integrity - Protecting People, Products, and Processes - pg.42-60				
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Please refer to the 2024 UK Annual Report, pg. 47				During 2025 there were no substantiated complaints concerning breaches of customer privacy and losses of customer data

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GRI STANDARD	DISCLOSURE	LOCATION	OMISSION			DIRECT ANSWER AND/OR NOTES
			REQUIREMENTS / OMITTED	REASONS	EXPLANATION	
Material topic: Employee skills development and employee well-being						
GRI 3: Material topics 2021	3-3 Management of Material Topics	Methodological Note - Identifying Sustainable Material Aspects - pg.8-10 Governance and Business Integrity - Sustainability Governance - pg.36,37 Sustainable Growth - Employee Engagement - pg.70-80				
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Appendix - Social KPIs - pg.174				
	404-2 Programs for upgrading employee skills and transition assistance programs		404-2	404-2	Brightstar cannot disclose the information required as data on programs for upgrading employee skills and transition assistance programs are not systematically tracked at Group level.	
	404-3 Percentage of employees receiving regular performance and career development reviews	Appendix - Social KPIs - pg.175				

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GRI STANDARD	DISCLOSURE	LOCATION	OMISSION			DIRECT ANSWER AND/OR NOTES
			REQUIREMENTS / OMITTED	REASONS	EXPLANATION	
Material topic: Relationship with suppliers						
GRI 3: Material topics 2021	3-3 Management of Material Topics	Methodological Note - Identifying Sustainable Material Aspects - pg.8-10 Governance and Business Integrity - Sustainability Governance - pg.36,37 Sustainable Growth - Sustainable Procurement - pg.131-138				
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria		308-1	Information unavailable	Brightstar cannot disclose the information required as data on new suppliers that were screened using environmental criteria are not systematically tracked at Group level.	
	308-2 Negative environmental impacts in the supply chain and actions taken		308-2	Information unavailable	Brightstar cannot disclose the information required as data on suppliers assessed in relation to negative environmental impacts are not systematically tracked at Group level.	
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria		414-1	Information unavailable	Brightstar cannot disclose the information required as data on new suppliers that were screened using social criteria are not systematically tracked at Group level.	
	414-2 Negative social impacts in the supply chain and actions taken		414-2	Information unavailable	Brightstar cannot disclose the information required as data on suppliers assessed in relation to negative social impacts are not systematically tracked at Group level.	

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GRI STANDARD	DISCLOSURE	LOCATION	OMISSION			DIRECT ANSWER AND/OR NOTES
			REQUIREMENTS / OMITTED	REASONS	EXPLANATION	
Material topic: Local communities support						
GRI 3: Material topics 2021	3-3 Management of Material Topics	Methodological Note - Identifying Sustainable Material Aspects - pg.8-10 Governance and Business Integrity - Sustainability Governance - pg.36,37 Sustainable Growth - Community Engagement - pg.105-130				
Material topic: Responsible, legal and secure gaming						
GRI 3: Material topics 2021	3-3 Management of Material Topics	Methodological Note - Identifying Sustainable Material Aspects - pg.8-10 Governance and Business Integrity - Sustainability Governance - pg.36,37 Sustainable Growth - Responsible Gaming - pg.97-104				

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United Nations Global Compact (UNGC) Table

UNGC AREAS	UNGC PRINCIPLES The following table indicates where topics related to the Ten Principles of the United Nations Global Compact are addressed within the Company's Strategy.	BRIGHTSTAR SUSTAINABILITY STRATEGY
HUMAN RIGHTS	1. Businesses should support and respect the protection of internationally proclaimed human right	Human Rights
	2. Businesses should ensure they are not complicit in human rights abuses	Human Rights
LABOR	3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining	Human Rights
	4. Businesses should uphold the elimination of all forms of forced and compulsory labour	Human Rights
	5. Businesses should uphold the effective abolition of child labour	Human Rights
	6. Businesses should uphold the elimination of discrimination in respect of employment and occupation	Human Rights
ENVIRONMENT	7. Businesses should support a precautionary approach to environmental challenges	Climate action, Biodiversity and Circularity
	8. Businesses should undertake initiatives to promote greater environmental responsibility	Climate action, Biodiversity and Circularity
	9. Businesses should encourage the development and diffusion of environmentally friendly technologies	Climate action, Biodiversity and Circularity
ANTICORRUPTION	10. Businesses should work against corruption in all its forms, including extortion and bribery	Governance and Business integrity

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California Corporate Greenhouse Gas Reporting Program (SB 253)

In line with the requirements set out by the California Climate Corporate Data Accountability Act (SB 253), this section provides a consolidated overview of all mandatory disclosures required under the regulation. SB 253 establishes a standardized framework for the reporting of greenhouse gas emissions and related information, ensuring transparency and comparability across reporting entities.

The table below summarizes the key data points required for compliance. All underlying information has been developed and reported in detail throughout this Sustainability Report, especially within the "Climate action, biodiversity and circularity" chapter; it is presented here in a synthesized format to facilitate clarity and ease of reference. This table includes only the mandatory disclosure elements under SB 253 and does not cover any optional or supplementary information requests.

California Corporate Greenhouse Gas Reporting Program (SB 253)		
Category	**Question**	**Answer**
Trade Secret Information	Inclusion of Trade Secret Information	No
Organization Information	Name of your entity	Brightstar Lottery PLC
Organization Information	Entity Employer Identification Number (EIN)	981193882
Organization Information	Entity primary industry NAICS code (choose from the drop-down)	71 - Arts, Entertainment, and Recreation
Organization Information	Entity website URL	https://brightstarlottery.com/
Organization Information	Headquarters office street address	5th Floor, Eldon House, 2 and 3 Eldon Street
Organization Information	Headquarters office city	London
Organization Information	Headquarters office state/province	N/A
Organization Information	Headquarters office country	United Kingdom

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California Corporate Greenhouse Gas Reporting Program (SB 253)		
Category	**Question**	**Answer**
Organization Information	Headquarters office postal code	EC2M 7LS
Organization Information	Name of the entity contact person	Stefania Colombo; Riccardo Troiani
Organization Information	Title/position of the entity contact person	Senior Director/Manager
Organization Information	Email address of the entity contact person	Stefania.Colombo@brightstarlottery.com; Riccardo.Troiani@brightstarlottery.com; sustainability@brightstarlottery.com
Organization Information	Date of verification	2026/07/15
3rd Party Verification	Name of the 3rd party assurance provider	Forvis Mazars
3rd Party Verification	Address of the 3rd party verifier organization	Via Ceresio, 7 20154 Milano (MI)
Inventory Boundary	Start date of the reporting period	2025/01/01
Inventory Boundary	End date of the reporting period	2025/12/31
Inventory Boundary	Organizational boundary approach used	Operational Control

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California Corporate Greenhouse Gas Reporting Program (SB 253)		
Category	**Question**	**Answer**
Inventory Boundary	List of all obligated entities or facilities over which reporting company has financial control or operational control	Brightstar Lottery PLC and its consolidated subsidiaries. For further details, please refer to the “Methodological Note” of the present Sustainability Report.
Inventory Boundary	Separate reporting of subsidiaries from the parent company	No
Inventory Boundary	Regions or specific facilities excluded from the organizational boundary	No
Inventory Boundary	Scope 1 – Stationary Combustion is included in the reporting boundary	Yes
Inventory Boundary	Scope 1 – Mobile Combustion is included in the reporting boundary	Yes
Inventory Boundary	Scope 1 – Process Emissions are included in the reporting boundary	Yes
Inventory Boundary	Scope 1 – Fugitive Emissions are included in the reporting boundary	No – Not applicable
Inventory Boundary	Scope 2 – Location-Based Purchased Electricity is included in the reporting boundary	Yes
Inventory Boundary	Scope 2 – Location-Based Purchased Heating is included in the reporting boundary	No – Not applicable
Inventory Boundary	Scope 2 – Location-Based Purchased Steam is included in the reporting boundary	No – Not applicable

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California Corporate Greenhouse Gas Reporting Program (SB 253)		
Category	**Question**	**Answer**
Inventory Boundary	Scope 2 – Location-Based Purchased Cooling is included in your reporting boundary.	No – Not applicable
Inventory Boundary	Scope 2 – Market-Based Purchased Electricity is included in your reporting boundary.	Yes
Inventory Boundary	Confirm whether is included in your reporting boundary	No – Not applicable
Inventory Boundary	Scope 2 – Market-Based Purchased Steam is included in your reporting boundary	No – Not applicable
Inventory Boundary	Scope 2 – Market-Based Purchased Cooling is included in your reporting boundary	No – Not applicable
Inventory Boundary	The reporting boundary includes Direct Biogenic emissions (e.g., stationary, mobile)	No – Not applicable
Inventory Boundary	The reporting boundary includes Indirect Biogenic emissions, such as all location-based (electricity, heating, steam, cooling) and all market-based (electricity, heating, steam, cooling)	No – Not applicable
Inventory Boundary	Exclusion of any facilities, operations and/or emissions sources been excluded from this inventory?	No
Disclosure	Scope 1 total direct emissions (in $mtCO_2e$).	24,620

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California Corporate Greenhouse Gas Reporting Program (SB 253)		
Category	**Question**	**Answer**
Disclosure	Scope 1: total direct emissions from Mobile Combustion (in $mtCO_2e$)	17,116
Disclosure	Scope 1: total direct emissions from Process Sources (in $mtCO_2e$)	7,504
Disclosure	Scope 1: total direct emissions from Fugitive Sources (in $mtCO_2e$)	-
Disclosure	Enter Scope 1 emission intensity per million dollars in revenue (in $mtCO_2e$/millions of dollars)	9.80
3rd Party Verification	All the reported Scope 1 emissions have been assured at the limited assurance level	Yes
Disclosure	Scope 2 total indirect emissions (in $mtCO_2e$).	20,279
Disclosure	Scope 2: Enter your total indirect emissions from Purchased/Acquired Steam (in $mtCO_2e$)	-
Disclosure	Scope 2: Enter your total indirect emissions from Purchased/Acquired Heating (in $mtCO_2e$)	-
Disclosure	Scope 2: Enter your total indirect emissions from Purchased/Acquired Cooling (in $mtCO_2e$)	-
Disclosure	Enter Scope 2 emission intensity per million dollars in revenue (in $mtCO_2e$/millions of dollars)	8.07
3rd Party Verification	All the reported Scope 2 emissions have been assured at the limited assurance level	Yes

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California Corporate Greenhouse Gas Reporting Program (SB 253)		
Category	**Question**	**Answer**
Disclosure	Scope 1 biogenic direct (combustion) emissions as total CO_2 (in $mtCO_2$)	-
Methods	Source of emissions factors used for Scope 1	DEFRA
Methods	Year for source of emissions factors	2025
Methods	Source of emissions factors used for Scope 2	Terna, EEA, AIB, Green-e
Methods	Global Warming Potential (GWP) factors you are using.	IPCC Fifth Assessment Report (AR5)

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California Corporate Greenhouse Gas Reporting Program (SB 253)		
Category	**Question**	**Answer**
Methods	Calculation approach you are using (e.g., activity data × emission factor)	Emissions are calculated using an activity based approach, whereby the quantity of a specific activity (such as electricity consumption, fuel use etc.) is multiplied by an appropriate emission factor to estimate the associated greenhouse gas emissions. The emission factors incorporate conversion coefficients that translate activity data into CO_2 equivalent values, including the application of Global Warming Potentials (GWP) for non CO_2 gases in line with IPCC methodologies. The resulting emissions are then aggregated across all sources and reported in CO_2 equivalent (CO_2e), ensuring consistency and comparability across different emission categories.
Methods	Process-specific calculations, including the tools or models used	Please refer to the “Climate action, biodiversity and circularity” chapter of the present Sustainability Report for specific details on the data collection and elaboration.

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California Corporate Greenhouse Gas Reporting Program (SB 253)		
Category	**Question**	**Answer**
Miniscule Sources / de minimis	Sources excluded based on the materiality threshold	No materiality threshold was applied.
MRR field	California Mandatory Reporting Regulations (MRR) facility ID number	N/A
Emission Reductions	The company utilizes direct contracts for renewable electricity or renewable gas	Renewable Electricity
Emission Reductions	Total emission reductions from direct contracts for renewable electricity (in $mtCO_2$)	5,029

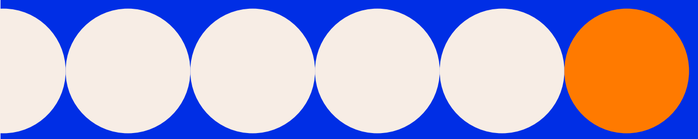
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Cautionary Note

This Sustainability Report may contain forward-looking statements (including within the meaning of the Private Securities Litigation Reform Act of 1995) concerning Brightstar Lottery PLC and its consolidated subsidiaries (together, the "Company") and other matters. These statements may discuss the Company's sustainability targets, goals, commitments and programs, other business plans, intentions, initiatives and objectives which are based on current beliefs of the management of the Company as well as expectations of assumptions made by and information currently available to such management. Further, these statements may include standards of measurement and performance that are either developing or are based on assumptions. These statements may be accompanied by words such as "aim," "anticipate," "aspire," "believe," "continue," "could," "estimate," "expect," "forecast," "future," "guidance," "hope," "intend," "may," "plan," "possible," "potential," "predict," "project," "seek," "shall," "should," "will," "would," or the negative or other variations of them. These forward-looking statements speak only as of the date on which such statements are made and are subject to various risks, uncertainties, changes in circumstances and other factors, many of which are outside the Company's control. Should one or more of these risks, uncertainties, changes in circumstances or other factors materialize or should any of the underlying assumptions prove incorrect, actual results including the achievement of targets, goals or commitments may differ materially from those predicted in the forward-looking statements and from past performance or achievements. Therefore, you should not place undue reliance on such statements. Factors that could cause actual results to differ materially from those in the forward-looking statements include (but are not limited to) the factors and risks described in the Company's annual report on Form 20-F for the financial year ended December 31-2025 and other documents filed by the Company from time to time with the U.S. Securities and Exchange Commission ("SEC") which are available on the SEC's website at www.sec.gov and on the investors section of the Company's website at www.brightstarlottery.com. You should carefully consider these factors and other risks and uncertainties that may affect the Company's business. The Company cannot guarantee that the results, targets, goals, achievements and other projections reflected or implied by any forward-looking statement will be realized or, even if substantially realized, that those results will have the forecasted or expected consequences and effects. Information in this Sustainability Report is presented as of December 31-2025 unless otherwise stated and should not be relied upon as representing developments subsequent to that date. Except as required under applicable law, the Company does not assume any obligation to update these forward-looking statements or information in this Sustainability Report for any subsequent date, including as a result of new information, future events or otherwise. Consequently, you should not rely on the information in this Sustainability Report as current or accurate for any date beyond December 31-2025, unless otherwise stated. All forward-looking statements contained in this Sustainability Report are qualified in their entirety by this cautionary statement. Should you have any questions or comments arising from this Sustainability Report please write to us at the following addresses: info@brightstarlottery.com or sustainability@brightstarlottery.com.



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