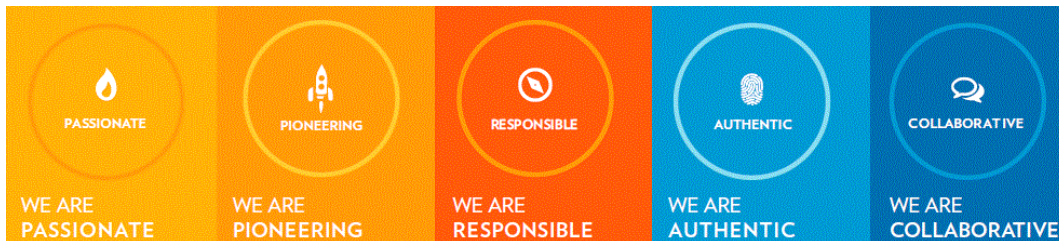


BRIGHTSTAR SUPPLIER CODE OF CONDUCT

Revision 1.8

Brightstar Lottery PLC and its subsidiaries (collectively, “BRIGHTSTAR”) strive to maintain the highest level of business standards and ethics, and we strongly encourage our Suppliers to follow our example. Our Suppliers are selected and evaluated beyond the basis of economic measures. We expect our Suppliers to fully comply with applicable laws and to adhere to internationally recognized environmental, social, and corporate governance standards. Our commitment to these business standards of excellence includes business ethics and regulatory compliance, human rights and labor practices, environmental regulations and protection, responsible mineral sourcing, health and safety, and confidential and proprietary information.

We expect that our Suppliers share our values and our commitments. We also expect our Suppliers to use their best efforts to implement these standards with their vendors and subcontractors.



This Supplier Code of Conduct outlines our expectations regarding the workplace standards and business practices of our Suppliers, along with their parent entities, subsidiaries, affiliates, subcontractors, and others who are within their supply chain. The expectations contained in this Supplier Code of Conduct are essential to our decisions to enter or extend existing business relationships. Each Supplier is responsible for ensuring that its employees, representatives, and subcontractors understand and comply with these guidelines. The expectations outlined in this Supplier Code of Conduct do not replace specific requirements in contracts. Rather, this Supplier Code of Conduct is intended to supplement the specific requirements in contracts. If a contractual term is stricter than the terms in this Supplier Code of Conduct, the Supplier must meet the stricter contractual requirement.

Diversity and Inclusion

It is BRIGHTSTAR's policy to provide contracting opportunities regardless of 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 local, state and federal laws.

Business Ethics and Regulatory Compliance

All BRIGHTSTAR Suppliers must conduct their business interactions and activities with integrity and must strictly comply with all laws and regulations related to bribery, corruption, money laundering and counterterrorism financing, and prohibited business practices.

- **Global Trade:** Suppliers must comply with all applicable laws and regulations governing export, re-export, and import of products.
- **Antitrust:** Suppliers must conduct business in accordance with antitrust and fair competition laws.
- **Whistleblower Protections:** Suppliers must protect worker whistleblower confidentiality and must create a mechanism for all workers to submit grievances anonymously.
- **Compliance with Global Anti-Corruption Laws:** Suppliers represent and warrant that they and their officers, directors, employees or agents comply with all Global Anti-Corruption Laws.
- **Compliance with Global Anti-Tax Evasion Laws:** Suppliers shall not engage in any activity, practice, or conduct that would constitute either a U.K. tax evasion offence, a U.K. tax evasion facilitation offence, or an equivalent foreign tax evasion offence or tax evasion facilitation offence for either BRIGHTSTAR or

Suppliers. Suppliers represent and warrant that they and each of their representatives follow all Anti-Tax Evasion Laws, including those against the facilitation of tax evasion.

- **Media:** Suppliers shall not speak to the news media on behalf of BRIGHTSTAR unless they are expressly authorized in writing to do so by the BRIGHTSTAR Corporate Communications department.
- **Business Courtesies:** Suppliers must avoid giving gifts to BRIGHTSTAR employees, offering anything of value to obtain or retain a benefit or advantage for the giver, and offering anything that might appear to influence, compromise judgment, or oblige the BRIGHTSTAR employee. If offering a gift, meal, or entertainment to BRIGHTSTAR employees, always use good judgment, discretion, and moderation.
- **Conflicts of Interest:** Suppliers shall avoid the appearance of or actual improprieties or conflicts of interests. Suppliers must not cause any conflicts of interest for BRIGHTSTAR employees and must avoid situations where a conflict of interest may occur.
- **Insider Trading:** If a Supplier learns of any material non-public information while working with BRIGHTSTAR, they must not share that information with others or use it for market trading.
- **Business Continuity:** Suppliers shall be prepared for any disruptions of their businesses (e.g., natural disasters, terrorism, software viruses, illness, pandemic, infectious diseases). This preparedness especially includes disaster plans to protect both employees and the environment as far as possible from the effects of possible disasters that arise within the domain of operations.

Human Rights and Labor Practices

BRIGHTSTAR expects its Suppliers to share its commitment to promoting and respecting human rights and equal opportunity in the workplace. All Suppliers are expected to conduct their employment practices in full compliance with all applicable laws and regulations and must, without limitation, take attention to:

- **Child Labor and Young Workers:** Supplier shall not employ children under the age of 15. If national laws or regulations allow children between the ages of 13 and 15 to perform light work, such work is not permitted under any circumstances if it would hinder a minor from the completion of compulsory schooling or training, or if the employment would be harmful to their health or development.
- **Forced Labor and Modern Slavery:** Suppliers must ensure that they do not participate in, or benefit from, any form of forced labor (including bonded labor, debt bondage, forced prison labor, slavery, servitude, or human trafficking). Suppliers will refrain from retaining the identity cards, travel documents, and other important personal papers of their employees. BRIGHTSTAR, in accordance with the U.K. Modern Slavery Act requirements, publishes its annual [statement on Modern Slavery](#), also available at [BRIGHTSTARLOTTERY.com](#).
- **Harassment and Non-Discrimination:** Suppliers are expected to keep their workplaces free of harassment, harsh treatment, violence, intimidation, corporal punishment, mental or physical coercion, verbal abuse, and discrimination.
- **Diversity and Inclusion:** Suppliers should, when appropriate, encourage a commitment to the diversity of economic inclusion, and where possible, track certified diverse spending.
- **Work Hours and Wages:** Suppliers shall comply with the respective national laws and regulations regarding working hours, wages, and benefits.
- **Freedom of Association and Collective Bargaining:** Suppliers must allow their employees the freedom of association and collective bargaining in accordance with applicable laws and regulations.

Environmental Regulations and Protection

Suppliers must comply with all applicable environmental laws, regulations, and standards, as well as implement an effective system to identify and eliminate potential hazards to the environment. Suppliers should work for continual improvement in their environmental management systems, and continuously improve their environmental performance. Suppliers should follow the principles of reducing, reusing, and recycling. Furthermore, Suppliers shall strive to reduce their consumption of energy and resources, as well as their waste and emissions.

Conflict Minerals

BRIGHTSTAR complies with the final rule on conflict minerals adopted by the U.S. Securities and Exchange Commission. This rule requires the implementation of reporting and disclosure procedures regarding conflict minerals. BRIGHTSTAR expects that Suppliers conduct appropriate due diligence to identify, disclose, and take remedial action if their products contain conflict minerals¹ that are used to finance conflict in the Democratic Republic of Congo or adjoining countries. BRIGHTSTAR publishes its annual statement on Conflict Minerals on [BRIGHTSTARLOTTERY.com](https://www.brightstarlottery.com), available at: [BRIGHTSTAR ESG Governance Documents](#). Individuals and Suppliers having concerns regarding conflict minerals non-compliance and or conflict mineral violations are directed to report that to the BRIGHTSTAR PLC Integrity Line which is managed by an independent provider. The Integrity Line is a confidential way to anonymously report non-compliance or violations via telephone or the online portal, contact details of which can be found at <https://www.brightstarlottery.com/compliance-documents-and-policies>.

Health and Safety

Suppliers must ensure that their workers are provided with safe, suitable, and sanitary work facilities. Suppliers must have effective health and safety prevention and remediation policies and procedures in place that comply with industry, national, and international law and regulations. Suppliers must provide to employees and their own suppliers and subcontractors protective equipment and training necessary to perform their tasks safely.

Confidential and Proprietary Information

BRIGHTSTAR Suppliers must ensure the protection of all sensitive information, such as confidential and protected personal information that must be used only for business purposes. For all information transferred electronically, Suppliers are expected to implement appropriate security mechanisms and systems, and to notify BRIGHTSTAR of any suspected or actual data breaches. Furthermore, BRIGHTSTAR expects its Suppliers to protect BRIGHTSTAR's personally identifiable information from unauthorized access, destruction, changes, use, and disclosure.

Compliance with this Supplier Code of Conduct

If cases of non-compliance with BRIGHTSTAR's Supplier Code of Conduct are found, BRIGHTSTAR and its Suppliers will develop ways and means to correct the non-compliance, provided BRIGHTSTAR receives the commitment from the Suppliers to correct the non-compliance within due time. Suppliers must promptly inform their BRIGHTSTAR contact when any situation develops that causes Suppliers to operate in violation of this Supplier Code of Conduct.

Accessible Procurement

Suppliers are encouraged to deliver goods and services that are accessible to everyone, including those with disabilities. If accessibility standards – for example, Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, included in US Section 508 Amendment to the Rehabilitation Act of 1973, and the harmonized EN 301 459 including WCAG 2.1 Level and the European Accessibility Act (EAA) – are applicable for the goods or services delivered, Suppliers are strongly encouraged to take these standards into consideration and take reasonable steps to meet them. BRIGHTSTAR is committed to helping our Suppliers create a culture of accessibility and helping everyone get the most out of Supplier relationships.

Further information and support

For further information, view our [Supplier Code of Conduct](#), also available on [Brightstarlottery.com](https://www.brightstarlottery.com).

¹ "Conflict Minerals" means columbite-tantalite (coltan), cassiterite, wolframite, or their derivatives (which are limited to tantalum, tin, and tungsten), and gold, that are necessary to the functionality or production of a product.

If you have any concerns or questions about the content of this document, or to get support from BRIGHTSTAR to help build your capabilities in relation to any of the areas detailed in the Supplier Code of Conduct, please send questions to Procurement.Operations@Brightstarlottery.com.

Revision History

Revision	Date	Description of changes	Requested By
1.6	01/25/2024	Updated Modern Slavery Links and Conflict Minerals Report links	Steve Young
1.7	09/30/2024	Added point Accessible Procurement	Steve Young
1.8	7/25/2025	Rebranded to Brightstar; updated URLs	Sharon Yattaw

Translations to this document are available in: [Spanish, Italian, Chinese](#)