

**BRIGHTSTAR LOTTERY**  
**WHISTLEBLOWER POLICY**

(POL - WB)

Owner: Legal/Compliance

**DOCUMENT CONTROL:**

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## **1. POLICY OVERVIEW**

Brightstar Lottery (“BRIGHTSTAR” or the “Company”) is committed to leading with responsibility and with integrity. One pillar of this commitment is providing encouragement and a clear path for employees and others whose interests align with BRIGHTSTAR to safely report good faith concerns about suspected or known misconduct of any kind regarding BRIGHTSTAR’s business practices and interactions worldwide. This is commonly referred to as “whistleblowing” and a person who reports misconduct in good faith is often referred to as a whistleblower (“Whistleblower”).

## **2. PURPOSE**

BRIGHTSTAR’s Whistleblower Policy (the “Policy”) sets out secure and confidential reporting paths that any person can use to report misconduct and sets forth the attendant requirements and obligations to protect a Whistleblower from retaliation, harassment, or victimization stemming from a good faith report. Specifically, this Policy, consistent with BRIGHTSTAR’s Code of Conduct, describes the range of activities, actions, or behaviors that may constitute reportable misconduct; provides information about protections for Whistleblowers; and details the process for reporting misconduct.

## **3. SCOPE**

The procedures and protections described in the Policy apply to all present or past employees, job applicants, officers, directors, consultants, suppliers, or vendors of BRIGHTSTAR and its subsidiaries or affiliates globally. Certain countries have specific additional requirements which are reflected in country-specific appendices to this Policy. These should be reviewed together with the main body of this Policy. The Policy also covers relatives and dependents of the foregoing or anyone with a work-based relationship with or connection to BRIGHTSTAR who has information about misconduct affecting BRIGHTSTAR. All are encouraged to report concerns of any suspected fraud or corrupt conduct or any other form of inappropriate behavior including potential violations of our Code of Conduct.

## **4. REPORTABLE MISCONDUCT**

Misconduct includes activities, actions or behaviors that may negatively affect or impact BRIGHTSTAR’s interests, that violate the laws of any of the jurisdictions where BRIGHTSTAR conducts business, or that may jeopardize the health or safety of people or property associated with BRIGHTSTAR. Examples of misconduct include, but are not limited to:

- Criminal activity such as fraud, theft, corruption, or bribery
- Possible violations of US and international laws such as the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act and other anticorruption laws
- A breach of BRIGHTSTAR policies such as the Code of Conduct, the Anti-Corruption Compliance and Ethics Policy, the Anti-Money Laundering Policy or the Antitrust Policy
- Discrimination or harassment
- Unethical or improper behavior
- Conduct that may result in inaccurate financial reporting or that may cause financial or non-financial loss to BRIGHTSTAR, such as violations of internal accounting controls or BRIGHTSTAR accounting practices
- Violation of laws related to the prevention of money laundering or terrorist financing

- Breaches related to the protection of privacy and personal data, or network and information security systems security
- Conduct that may endanger BRIGHTSTAR customers or the public
- Conduct or circumstances that raise concerns about the safety of the workplace and the health and well-being of BRIGHTSTAR employees or others working on behalf of BRIGHTSTAR
- Violation of a regulatory requirement or obligation
- Conduct that raises concerns about the integrity of BRIGHTSTAR management
- Environmentally detrimental practices
- Deliberate concealment of any of the above or any other act of misconduct

## 5. INTERNAL REPORTING CHANNELS

BRIGHTSTAR encourages people to report misconduct through the internal reporting channels described in this section. This includes written, oral, or in-person reporting to BRIGHTSTAR's General Counsel or Legal Department, the Chief Compliance Officer or Compliance Department, the People & Transformation Department, the Environmental, Health and Safety Department, or to an employee's manager or supervisor. When BRIGHTSTAR management becomes aware of misconduct, either through firsthand knowledge or a report from a Whistleblower, management shall immediately notify the Legal Department and the Compliance Department.

BRIGHTSTAR strongly encourages people to report misconduct and offers several reporting methods:

- **BRIGHTSTAR's Integrity Line** (hosted by an independent third-party vendor and available 24 hours a day, 7 days a week)  
By phone from the United States or Canada: 1-888-807-4832 By phone from Italy: 800194674  
By phone from all other locations: call the country-specific AT&T Direct Access Code found at <https://www.business.att.com/bt/access.jsp> then dial the access code followed by 888-807-4832  
  
Via the internet at: <https://brightstarlottery.integrityline.com>
- **Legal Department** Email: [legal@brightstarlottery.com](mailto:legal@brightstarlottery.com)  
Phone: 1-401-392-5805  
Mail: BRIGHTSTAR, 10 Memorial Boulevard, Providence, Rhode Island 02903
- **Compliance Department** Email: [compliance@brightstarlottery.com](mailto:compliance@brightstarlottery.com)  
Phone: 1-401-392-7600  
Mail: BRIGHTSTAR, 10 Memorial Boulevard, Providence, RI 02903
- **People & Transformation** Email: [PeopleServices@brightstarlottery.com](mailto:PeopleServices@brightstarlottery.com)  
Phone: 1-855-446-6947
- **Environmental, Health and Safety Department**  
Email: [safety@brightstarlottery.com](mailto:safety@brightstarlottery.com)
- **Oral or In-Person Reporting**  
Submit a request through one of the above channels to schedule a phone call or in-person meeting.

## **6. EXTERNAL REPORTING**

BRIGHTSTAR encourages reports through internal channels; however, a person may also submit a report to a regulatory authority, government agency, or local officials (“competent authorities”) if the Whistleblower believes that their report of misconduct has been ignored or not addressed, that they will suffer retaliation, that the competent authority provides a safer and more appropriate mechanism for addressing the misconduct, or if there are reasonable grounds to believe that there is an imminent or manifest danger to the Company or public interest, or a risk of irreversible damage, including harm to person(s) or the public. The Legal Department and the Compliance Department may be consulted for guidance on external reporting and contacting competent authorities. Attachment 1 to this Policy lists competent authorities in jurisdictions, where required and where a competent authority has been designated. This list will be updated on a periodic basis.

## **7. WHISTLEBLOWER CONFIDENTIALITY AND ANONYMITY**

### **7.1 Confidentiality**

The reporting channels and investigation procedures described in this Policy are designed and operated in a secure manner to preserve the confidentiality of the identity of the whistleblower, any facilitator (meaning individuals who assist the whistleblower during the reporting process), and any third parties mentioned in the report of misconduct.

### **7.2 Anonymity**

The Company will evaluate anonymous reports of misconduct and will investigate the report when sufficient facts and a reasonable basis are articulated.

## **8. WHISTLEBLOWER PROTECTION**

### **8.1 Non-Retaliation**

BRIGHTSTAR prohibits its employees, officers, directors and consultants from discharging, demoting, suspending, threatening, harassing, or in any way retaliating or discriminating against an individual who in good faith reports misconduct. No disciplinary or other action, including indirect action against colleagues, family, or friends, shall be taken based on a report to the Integrity Line or an inquiry to the Legal or Compliance departments or any of the other reporting channels identified in this Policy. Examples include, but are not limited to, unwarranted negative performance reviews, transfer or reduction of duties or other forms of discrimination.

### **8.2 Protective Measures**

If a Whistleblower believes they have been subjected to retaliation stemming from their report of misconduct, they should contact the Legal or Compliance departments through the channels detailed in Section 5 above to report the retaliatory actions. Appropriate steps will be taken to investigate and address retaliatory actions, consistent with this Policy and in accordance with any applicable requirements in the jurisdiction where the alleged retaliation occurred.

## **9. WHISTLEBLOWER REPORTS – EVALUATION AND INVESTIGATION**

Whistleblower reports of misconduct will be evaluated and investigated impartially and without conflict of interest under the oversight of the Legal Department and Compliance Department in accordance with BRIGHTSTAR’s internal procedures. For a whistleblower, the key elements of the process include:

- **Confidentiality** – As described in Sections 5 and 7 of this Policy, the Whistleblower

reporting process is designed to maintain confidentiality for the Whistleblower and all others materially affected by the reported misconduct.

- **Impartiality and Diligence** – Evaluation and investigation of misconduct will be conducted or overseen by the Legal Department and/or the Compliance Department impartially and without conflict of interest. Investigations will be carried out diligently and in a timely manner taking into consideration the complexity, nature and location of the reported misconduct.
- **Acknowledgment** – The Compliance Department or Legal Department will acknowledge receipt of the report to the Whistleblower within a reasonable time or a time set by applicable law, unless the Whistleblower requests otherwise.
- **Feedback and Determinations** – The Company will endeavor to provide feedback to the Whistleblower within three months of receiving the report of misconduct. Feedback may be very limited or not required at all if providing it could prejudice the investigation or affect the rights of the implicated individuals. Although the Whistleblower may receive feedback regarding their report, this does not include access to the investigative reports or materials.

## **10. WHISTLEBLOWER RESPONSIBILITIES**

### **10.1 Reasonable Belief and Cooperation**

At the time of submitting a report, Whistleblowers should have a reasonable belief that the alleged misconduct has occurred or is suspected of occurring. Everyone covered by the Policy has an obligation to cooperate during an investigation.

### **10.2 False Reporting**

Employees who intentionally make false reports are subject to discipline according to BRIGHTSTAR's disciplinary procedures, which may include termination. Persons who file reports of misconduct for illegal purposes are subject to appropriate legal action by BRIGHTSTAR and/or by relevant governmental authorities.



## **APPENDIX 1**

### **AUSTRIA**

#### **1. Competent Authority**

Federal Bureau of Anti-Corruption (Bundesamt zur Korruptionsprävention und Korruptionsbekämpfung)

<https://www.bak.gv.at/>

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## **APPENDIX 2**

### **ROMANIA**

#### **1. Anonymous reporting**

Whistleblowers are encouraged to provide their name and contact details when submitting a report so that the Company can follow up if needed. However, anonymous reports are accepted and will be investigated if they contain sufficient information.

#### **2. Competent Authority**

[Agentia Națională de Integritate](#)

[Bulevardul Lascăr Catargiu nr. 15, cod postal: 010661, sector 1, București – Romania](#)

[Telephone: +40-372-06 98 69;](#)

[Fax: +40-372-06 98 05;](#)

[E-mail: \[ani@integritate.eu\]\(mailto:ani@integritate.eu\);](#)

[Website: \[www.integritate.eu\]\(http://www.integritate.eu\)](#)

#### **3. Updates following submission of reports**

The Company will confirm receipt of a report within 7 days. The Whistleblower will be informed of the outcome of the investigation upon its completion, and in any case, will be provided with an update within 3 months' of submitting a report regardless of whether the investigation has been completed, unless such updates would prejudice the conduct of investigations.

#### **4. Retention of information**

Reports and information generated in investigations will be retained for a period of 5 years, or longer if required by applicable law.

#### **5. False reports**

False reports made to BRIGHTSTAR via one of the channels described in this Policy may be reported to the relevant authorities and may constitute a criminal offence, punishable by fines of between 2,500-30,000 lei (RON).

## **APPENDIX 3**

### **SPAIN**

#### **1. System Manager**

In accordance with applicable laws, BRIGHTSTAR has appointed Kevin Romano as System Manager for the Integrity Line. Kevin can be contacted on Kevin.Romano@brightstarlottery.com or +34 649419690.

#### **2. Competent Authority**

[Oficina Antifraude de Catalunya](#)

[C/ Ribes 1-3, 08013 Barcelona](#)

[Telephone: 935 545 555](#)

[Fax: 935 545 564](#)

Website: <https://denunciesanonimes.antifrau.cat/#/?lang=es>

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**APPENDIX 4**

**UNITED STATES**  
**OF AMERICA**

**1. Competent Authority**

United States Securities and Exchange Commission  
Office of the Whistleblower  
c/o ENF-CPU  
14420 Albemarle Point Place, Suite 102  
Chantilly, Virginia 20151-1750

Phone: (202) 551-4790

Fax: (703) 813-9322

Online: [www.sec.gov/whistleblower/submit-a-tip](http://www.sec.gov/whistleblower/submit-a-tip)