
PRODUCT RESPONSIBILITY POLICY

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1. PURPOSE




Brightstar Lottery (Brightstar) is committed to designing and delivering products that minimize risks to customers, employees, end users, and the environment. The Company’s goal is to ensure full compliance 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 customer feedback, and ensuring that products and services meet or exceed customer expectations.

This policy outlines Brightstar’s sustainability strategy, which is guided by three key elements: Empowering Our People, Collaborating with Partners, and Preserving the Planet. These elements are activated through six spheres of impact, which are dedicated actions that ignite change. They include employee engagement; human rights; responsible gaming; community engagement; sustainable procurement; and climate action, biodiversity, and circularity.

This policy focuses on responsible gaming and climate action, biodiversity, and circularity spheres of impact.

At Brightstar, responsible gaming refers to the strategic goal of contributing to player protection by promoting positive play, raising awareness of responsible gaming tools, and securing third-party credibility through accreditation and research. The Company promotes climate action, biodiversity and circularity by enhancing energy efficiency, supporting the transition to renewable energy, investing in eco-design product strategies, selecting environmentally conscious materials, and boosting recycling, reuse, and recovery practices.

Brightstar’s product responsibility initiatives support three Sustainable Development Goals, as defined by the United Nations. They include:

SDGs	
	<p>Goal 3: Good health and well-being Ensure healthy lives and promote well-being for all at all ages.</p>
	<p>Goal 12: Responsible consumption and production Ensure sustainable consumption and production patterns.</p>
	<p>Goal 13: Climate action Take urgent action to combat climate change and its impacts.</p>

2. SCOPE

This policy applies to all Brightstar products, including retail solutions, digital solutions, and printing operations.

3. REFERENCES

This policy supports the following treaties of international law and standards by applying their founding principles. Each term is defined in Section No. 9 (Definitions, Abbreviations and Acronyms).

Regulatory references

Accessibility

- Web Content Accessibility Guidelines (WCAG)
- European Accessibility Act (EAA) – effective June 2025

Safety Standards

- UL 62368-1, Third Edition, dated October 22, 2021
- CAN/CSA C22.2 No. 62368-1:19, Third Edition, dated October 22, 2021
- IEC 62368-1:2018, Edition 3.0
- CE Marking and CE Declaration of Conformity
- European Union directives, including:
 - Low voltage directive
 - Radio and telecommunications terminal equipment (R&TTE) directive
 - Electromagnetic compatibility (EMC) directive

Environmental and Health Regulations

- Restriction of Hazardous Substances (RoHS) Directive, 2015/863/EU (RoHS 3)
- Regulation (EC) No 850/2004 on Persistent Organic Pollutants (POP)
- Regulation (EC) No 1907/2006, Registration, Evaluation, Authorization of Chemicals (REACH)
- Waste Electrical and Electronic Equipment (WEEE) Directive, 2002/96/EC
- Occupational Safety and Health Administration (OSHA) Standard, 1910.1200(c)(iii)

Industry Guidelines

- World Lottery Association Responsible Gaming Framework
- WLA Security Control Standard: 2020 (WLA SCS 2020)
- North American Association of State and Provincial Lotteries (NASPL) Security Guidelines
- International Certification Assessment Process (iCAP) Standards
- European Lotteries Responsible Gaming Standards

Internal references

The following Brightstar internal documents are linked to the principles listed in this policy and support its implementation:

- Environmental Compliance policy
- Environmental policy
- Code of Conduct

- Responsible Gaming policy
- Supplier Code of Conduct
- Global Sustainability policy

4. PRINCIPLES

Accessibility

Brightstar's retail solutions are being designed to comply with modern accessibility standards, including the European Accessibility Act (EAA), which took effect in June 2025. Brightstar is working to comply with these standards by:

- Ensuring that self-service terminals and digital gaming services meet harmonized accessibility requirements for people with disabilities.
- Implementing features such as assistive technology compatibility and clear, perceivable user interfaces across all new product launches.

Brightstar is also undergoing an accessibility overhaul of its digital ecosystem (web and applications) to meet all regulatory standards.

Access to Quality Information

Brightstar ensures transparency and fairness by providing players with secure, accurate, and accessible game information.

Personal Safety of Consumers and/or End-Users, and Regulatory compliance

Brightstar adopts policies and procedures to ensure employee safety and the safety of products for end users. Brightstar also 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 Brightstar's Responsible Gaming policy.

Brightstar complies with all applicable industry standards, ensuring the Company's approach to product design reflects the latest research and international benchmarks. Additionally, Brightstar performs internal safety testing to identify and mitigate potential safety issues, and to ensure compliance with relevant standards. All Company products are submitted to safety laboratories, where certifications are issued to confirm that the products meet national and international requirements.

➤ Retail solutions

Brightstar engineers its retail solutions to meet stringent safety requirements across all markets. All Company products are certified by accredited laboratories, such as CAN/CSA, IEC, TUV, and ETL, and all comply with all applicable European Union regulations. These include but are not limited to, the EU's low voltage directive, R&TTE directive, and its EMC directive. Brightstar products bear the CE marking and are backed by a CE Declaration of Conformity to ensure compliance with national and international safety standards.

These standards include:

- UL 62368-1, 3rd Edition, 2021-10-22
- CAN/CSA C22.2 No. 62368-1:19, 3rd Edition, 2021-10-22
- IEC 62368-1:2018 (Ed 3.0)
- Test report and certificate with national deviations for all member countries.

Pinch points are eliminated through thoughtful design, and deburring is implemented during fabrication to ensure all handling areas are free of sharp edges.

- **Printing operations**

Printed tickets do not exhibit a physical hazard or health risk, per OSHA standard 1910.1200©(iii).

Integrity and Consumer Protection

- **Digital solutions**

Brightstar's digital offerings include a collection of responsible gaming capabilities allowing for positive and sustainable play experiences. Operators and players can set default and maximum thresholds for deposit limits, spend limits, session timers, and game play timers. Players can also self-exclude and establish timeouts from play.

- The iLottery RGS transaction log tracks eInstant game activity, including try-and-buy modes, wagers, payouts, and prize tiers. These logs capture player actions and metadata. The data model captures player, transaction, and campaign data for analytics, contract compliance, and responsible gaming. Dashboards monitor system health and notify appropriate teams of issues. Transaction log entries are encrypted at rest and in transfer with the latest industry-approved ciphers.
- iLottery RGS transaction logs are support comprehensive auditing by capturing detailed metadata across the transaction lifecycle.
- Each transaction is logged with attributes such as:
 - Interaction type and subtype
 - Transaction state (e.g., executed, failed, redirected)
 - User session ID and user creation
 - Channel, date, and business day
 - Amounts and capture state

- **Printing operations**

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 has activation processes that ensure tickets become active only upon retailer activation. This prevents theft or unauthorized sale prior to activation. Security features are verified during the printing process, and independent labs evaluate effectiveness according



to NASPL security guidelines. Tickets are built to perform under extreme conditions, maintaining scratchability and integrity even after prolonged storage or exposure to humidity and cold. One hundred percent of tickets are accounted for, and all excess is shredded, per protocol.

Health and Environmental Impact

➤ Retail solutions

Brightstar requires all direct material suppliers to comply with the European Union's directive restricting certain hazardous substances in electrical and electronic equipment (RoHS) (2015/863/EU) (RoHS 3), as published and amended. All product designs comply with restrictions of hazardous substances (RoHS) standards, underscoring the Company's dedication to environmental and regulatory compliance. All product designs comply with Regulation (EC) No 850/2004 of the European Parliament on persistent organic pollutants, also known as POP, which came into force on May 20, 2004, as published and amended. Brightstar complies with Regulation (EC) No 1907/2006 of the European Parliament on the registration, evaluation and authorization of chemicals, also known as REACH, as published and amended. Brightstar intends to comply with Regulation 2002/96/EC of the European Union's waste electrical and electronic equipment directive, also known as the WEEE recycling initiative, as published and amended.

➤ Printing operations

Brightstar's tickets and paper products are produced using non-toxic inks and coatings to ensure consumer safety and reduce environmental impact. Printed tickets do not exhibit a physical hazard or health risk per OSHA standard 1910.1200©(iii). Brightstar has implemented procedures for hazardous waste collection and identification of environmental aspects, along with a program to minimize VOC and HAP emissions. Brightstar manufacturing sites have flawless records of health and safety compliance, reflecting the Company's commitment to responsible manufacturing.

Data Security and Technological Innovation

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 International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC).

➤ Digital solutions

Brightstar's eInstant game files are secured on the Company Remote Game Server, ensuring they are tamper-proof.

Brightstar's outcome determination engine (ODE) ensures fairness, security, and transparency in all lottery-related operations. This policy outlines the controls and processes governing grids, odds, pools, and randomness management within the ODE.

Grids and odds management

- ODE utilizes grids and pools to manage odds and randomness in lottery games.
- Checksums for ODE grids are available to lottery operators to allow for auditability at any time.
- No API is provided for modifying odds, ensuring that odds remain immutable through external interfaces.
- Data on all grids are securely stored in a locked-down database, which serves as a central component of the Company's defense architecture.

Database Security

- The database operates under strict least privilege and need-to-know access principles.
- Data is encrypted both in transit and at rest to maintain confidentiality and integrity.

Modification Controls and Audit Trails

- Any modification to odds affects all sessions and is immediately detectable by system monitoring.
- Manual operations within the system automatically generate an audit trail for traceability.
- Regular audits of system activities are conducted to ensure ongoing compliance.

Random Number Generation (RNG) Security

- RNG data is encrypted from its source to ODE, guaranteeing confidentiality, integrity and authenticity.

Pool Depletion and Distribution Analysis

- For pools that are depleted, both planned and actual distributions are analyzed against the designed odds to identify and investigate any irregularities.

➤ **Printing operations**

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 processes.

4. IMPLEMENTATION AND MONITORING

Brightstar implements this policy through procedures and operational controls integrated into product lifecycles. Effectiveness is monitored through periodic reviews and internal controls to ensure ongoing compliance. Brightstar maintains a structured supplier quality management process that includes qualifications, periodic evaluation, and monitoring of

suppliers' performance to ensure consistent quality and regulatory compliance. The Company has implemented and continues to refine systematic processes for identifying, addressing, and preventing product and process nonconformities, as well as promoting continuous improvement across all operations. This policy is subject to periodic review to ensure alignment with evolving regulatory frameworks, technological innovation, and stakeholder expectations. All updates will reflect changes in relevant sustainability regulations and standards, European Sustainability Reporting Standards (ESRS), and internal audit results.

5. COMMUNICATION AND TRAINING

Communicating commitments over time stimulates continuous improvement and supports corporate reputation, a sense of belonging, and engagement. This policy will be made available to all relevant interested parties and is publicly accessible through appropriate communication channels, including the Company's official website (www.brightstarlottery.com).

6. ROLES AND RESPONSIBILITIES

This policy has been developed by targeted Brightstar cross-functional working groups focused on the promotion of product responsibility within the Company operations and across its entire supply chain.

Brightstar's Global Lottery CEO owns this policy and is accountable for its implementation and compliance across all operations. As a member of the Sustainability Steering Committee (SSC), the CEO of Global Lottery helps define the Company's long-term sustainability goals, ensures consistency of practices across regions, and promotes effective communication and the sharing of best practices.

Brightstar's Global Sustainability team manages environmental, social and governance matters, reporting to the Senior Vice President of Branding, Communications and Sustainability, who also serves as Chair of the SSC. The Chair reports to Brightstar's Nominating and Corporate Governance Committee (NCGC) — which monitors Brightstar's sustainability strategy — and to the Board's Executive Chair, who oversees the Company's corporate governance and sustainability initiatives, and provides strategic guidance. This structure ensures product responsibility is embedded in decision-making and operations across the organization. Moreover, the internal audit (IA) department verifies compliance with the policy.

7. REPORTING CONCERNS

Employees, consumers, and end users who are aware of perceived violations of this Policy Statement should immediately report the incident to any member of Brightstar's management team, the Company's People and Culture function, or to the Integrity Line (managed and operated by an independent third party), which can be accessed via the following:

- Online Portal: <https://brightstarlottery.integrityline.com>

- From the United States and Canada call: 1-888-807-4832
- From Italy call: 800194674
- From all other locations, first call the country-specific AT&T Direct Access Code found at <https://www.business.att.com/bt/access.jsp> and then call 888-807-4832.

Agents and representatives of Brightstar, third parties, and members of the public are also encouraged to report any perceived violations of the Company principles to the Company Integrity Line, and reports to the Integrity Line can remain anonymous if desired.

8. HISTORY OF THE DOCUMENT

The policy is periodically reviewed and updated to ensure that it remains relevant and effective.

History of the Document		
Date	Version	Updates
April 2026	Version 1	First release

9. DEFINITIONS, ABBREVIATIONS, ACRONYMS

The following table shows specific terms used in the policy and a brief definition of them.

Term / Abbreviation	Definition
AT&T Direct Access Code	International dialing access code used to reach the Integrity Line from abroad.
Blockchain (Forensic Blockchain)	Immutable digital ledger used to secure game data and ensure integrity.
CAN/CSA C22.2 No. 62368-1	Canadian safety standard equivalent to UL 62368-1.
CE	Conformité Européenne; indicates compliance with EU standards.
CE Declaration of Conformity	Manufacturer’s statement that a product meets EU regulatory requirements.
CE Marking	Certification indicating conformity with EU health, safety, and environmental protection standards.
EAA	European Accessibility Act; EU legislation establishing accessibility requirements (effective 2025).

EMC Directive	EU directive ensuring electromagnetic devices do not interfere with one another.
HAP	Hazardous Air Pollutants; regulated substances under environmental standards.
iCAP	International Certification Assessment Process; certification framework for lottery operations.
IEC 62368-1	International safety standards for AV and ICT equipment.
Integrity Line	Independent reporting channel for policy violations or concerns.
Low Voltage Directive (LVD)	EU directive ensuring electrical equipment safety.
NASPL	North American Association of State and Provincial Lotteries; provides industry guidelines.
NextGen Platform	Brightstar's patented platform integrating digital security and blockchain for game integrity.
ODE	Outcome determination engine; Brightstar's secure engine for determining game outcomes.
OSHA	Occupational Safety and Health Administration; sets workplace safety standards in the United States.
POP Regulation	EU regulation on persistent organic pollutants.
Positive Play	Responsible gaming framework promoting informed and healthy player behavior.
R&TTE Directive	EU Directive on Radio and Telecommunications Terminal Equipment; governs radio and telecom equipment.
REACH	Registration, Evaluation, Authorization of Chemicals; EU chemical safety regulations.
RGS	Remote game server; platform supporting digital game transactions and logs.
RNG	Random number generator; system ensuring randomness in game outcomes.
RoHS / RoHS 3	EU Directive on Restriction of Hazardous Substances Directive; limits hazardous materials in electronics.

Self-Exclusion	Responsible gaming tool allowing players to block access to gaming for a defined period.
Session Timer / Deposit Limit / Spend Limit	Responsible gaming controls enabling players or operators to set play boundaries.
UL 62368-1	Safety standards for audio/video, IT, and communication technology equipment.
VOC	Volatile organic compounds; regulated emissions from manufacturing.
WCAG	Web content accessibility guidelines; international standards for digital accessibility.
WEEE Directive	EU Directive on Waste Electrical and Electronic Equipment Directive; governs recycling and disposal.
WLA	World Lottery Association; global lottery industry body.
WLA SCS 2020	WLA Security Control Standard 2020; security certification for lottery operations.



CEO Global Lottery