

# CODE OF CONDUCT

RESPONSIBLY LEADING  
OUR INDUSTRY



JULY 2025



Dear colleagues,

Here at Brightstar we do the right thing.

Our Code of Conduct provides a roadmap for operating in the highly regulated global lottery industry.

It's imperative that each of us does our part to ensure the Company complies with the laws and regulations that govern our business. We are all responsible for operating ethically and in accordance with the highest levels of integrity and accountability. That is what our customers and our players expect from us, as they should.

The Code is designed to help you understand what is legal, fair and appropriate. If we each do our part to honor the Code, Brightstar is best positioned to avoid situations that put our operations at risk. All employees are expected to understand and abide by the Code.

Should you ever have a question about the Code or something that is not addressed by the Code, do not hesitate to contact our compliance organization.

We strive for excellence in all that we do, and our Code is no exception. Your continued dedication to these guidelines is foundational to our future success.

Thank you for upholding the principles and values that make us who we are.

Vince Sadusky  
Chief Executive Officer  
Brightstar





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# Introduction.

## Our Core Values

At Brightstar, our Core values are:

### 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.

## Code Basics

There are some basic things that everyone needs to understand about our Code:

- It applies to everyone who works at Brightstar, including all employees, officers, directors, and consultants. Certain business partners may also be subject to our Code.
- It applies everywhere we do business.
- It will not address every issue you may face, but it will give you a better foundation for making good decisions. You should refer to the applicable Brightstar policy or policies or contact a listed resource if you have questions. Until such policies are updated in connection with the separation of the Global Gaming and Digital & Betting businesses from the Global Lottery business, all policies cited herein shall refer to the legacy IGT policies in effect at the relevant time.

Brightstar takes compliance with our Code very seriously. Violations of our Code may result in disciplinary action. We rely on you to report any issues or concerns about potential ethical misconduct. Brightstar will not retaliate against you for raising a concern about potential misconduct.

## Why We Have Our Code

We created our Code because we are all accountable for ethical business conduct. Our Code will help you understand our obligations as a global company and how these obligations apply to you. Whether you are working with colleagues, customers, regulators, or business partners, our Code applies. You have an important role to play in helping our Company live up to our high standards.

**Our Code does not replace or amend any terms and conditions of employment based on applicable laws or written agreements that shall be properly documented by the local policy/agreement owner.**





**We are responsible in  
how we treat one another.**



## Diversity and Inclusion

### Value Differences

At Brightstar, we value diversity and respect for all employees. We recognize that our varying backgrounds, experiences, and perspectives reflect the global communities we serve and contribute to a fair, inclusive culture that enables all employees to feel appreciated, respected, supported, and engaged. We make purposeful choices to create a fair and inclusive culture that values unity, diversity and belonging in our people, players, customers and communities. Here, we honor and respect the uniqueness of each human being while being committed to providing opportunities for all to grow and contribute. Tomorrow. And far into the future.

### Responsibility Starts with You:

- Encourage the open exchange of ideas and always be open to hearing the thoughts and perspectives of others, including those whose background or lived experience is different from your own.
- Embrace collaboration — contribute to an environment where partnership and collaboration are supported.

### Responsibility in Action

A work environment that is open, diverse, collaborative, and supportive promotes creativity, innovation, and employee initiative, and that is good for business.

## Equal Employment Opportunity and Non-Discrimination

Brightstar does not tolerate discrimination in any form. Qualification, performance, and merit drive Brightstar's employee practices.

### Responsibility Starts with You:

- Do not discriminate when making any employment decisions, including recruitment, promotions, training, professional development, and pay levels. Base those decisions on qualification, performance, and merit.

- Never treat someone differently based on a physical or personal characteristic such as:
  - Race
  - Ancestry
  - Religion or belief
  - National origin
  - Citizenship
  - Age
  - Gender
  - Sexual orientation
  - Gender identity
  - Gender expression
  - Marital or civil partner status
  - Pregnancy or parenthood
  - Military or veteran status
  - Physical or mental disability
  - Medical condition
  - Genetic information
  - Other legally protected status in accordance with applicable law

### Responsibility in Action

Brightstar values all its employees and does not tolerate any form of discrimination.



## Mutual Respect

Our culture values dignity and respect. The way we treat one another has a direct impact on our ability to collaborate and advance our efforts. As a global company that wants to succeed and grow, Brightstar does not tolerate harassment, bullying, retaliation, intimidation, or mistreatment.

### Responsibility Starts with You:

- Treat everyone with respect, all the time.
- Do not make jokes or discuss sensitive topics that embarrass, cause discomfort, inappropriately target differences, alienate coworkers, or that minimize any aspect of their identity.
- Speak up if you see anyone being treated disrespectfully.

### Responsibility in Action

Humor is all about context, and not all jokes are appropriate at work. Use your best judgment, be open to feedback, and speak up if someone else's behavior could make you or others feel uncomfortable.



## We Do Not Take Chances with Integrity

As a general rule, harassment includes conduct (such as words, pictures, or physical contact) that is unwanted. Avoid actions that are or could be deemed intimidating, hostile, or offensive, like:

- Jokes about race, ethnicity, religion, gender, or sexual orientation
- Repeatedly picking on a colleague
- Posting or sending inappropriate emails, pictures, or messages

### Sexual Harassment Can Include:

- Unwelcome touching or invading personal space
- Sexualized humor or conversation
- Repeated romantic invitations
- Hinting at promotions or rewards in exchange for sexual favors

Remember that “just kidding!” is not a defense. If it is not appropriate to do, it is not appropriate to joke about.

## Environmental Health & Safety

At Brightstar, we conduct our business with respect for the health, safety, and well-being of our people, the environment, and the communities in which we operate.

To meet this objective, we are committed to the principles listed below:

- We comply with applicable government safety laws and regulations.
- We maintain our culture where employees, contractors, customers, and suppliers are empowered to report health and safety concerns in an environment free of retaliation.
- We address safety and health needs in the design of new or modified facilities and equipment to prevent or minimize work-related hazards and improve sustainable operations.
- We evaluate equipment, processes, and materials in terms of hazard and risk through risk assessments or other equivalent methods.
- We provide education and training programs emphasizing individual responsibility for health and safety decisions and actions.
- We minimize exposures to hazardous materials by eliminating or minimizing the use of these materials when technically and practically feasible.
- We seek to continually improve safety management systems and sustainable processes when technically and practically feasible.

Each of us is responsible for identifying, understanding, and mitigating unacceptable risks that impact the health, safety and security of our employees, and the environment in which we operate. Where risks cannot be eliminated, we mitigate them to acceptable levels.

## Data Privacy

As part of our business, we may need to collect, store, share, and otherwise process personal data about our employees, customers, players, and business partners. At Brightstar, we recognize that we have a responsibility to respect the privacy rights of individuals by protecting the personal data under our control.

### Responsibility Starts with You:

- Never share or disclose personal data unless you are explicitly authorized to do so.
- Never collect, store, share, access, or use personal data that is not relevant to your job.
- Do not process personal data that is incompatible with the purposes for which the personal data was collected.
- Seek guidance from Brightstar's Data Privacy Office if you work with personal data and need to know the laws applicable to personal data.
- Comply with applicable local laws when you collect, store, share, process, and use personal data, recognizing that requirements across jurisdictions vary.

- If you feel personal data has been disclosed improperly, it is your responsibility to inform your manager, the Privacy Office, or submit a Security Incident Notification ticket through Easy Vista.

### Responsibility in Action

Be especially careful with sensitive personal data, like information about someone's race or ethnicity, political opinions, or protected health information (PHI) (e.g., health status, diagnosis, treatment, biometric or genetic information, gender identity, or sexual orientation).

There are laws protecting this sensitive personal data, so avoid discussing this data, especially if you have access to it as part of your job.







**We are responsible with  
Brightstar's assets and information.**



## Physical Property and Financial Resources

We are all accountable for protecting Brightstar’s assets. This means we need to use good judgment when we use or manage the Company’s property and financial resources.

### Responsibility Starts with You:

- Be responsible with Brightstar’s property and report any theft or misuse.
- Never use Brightstar assets to benefit yourself or your family, such as using Brightstar funds for a personal expense.
- Do not execute any agreements on behalf of Brightstar unless you have business and Legal Department approval and are authorized to do so.
- Make sure to complete all expense reports (and, for supervisors, expense approvals) accurately and in a timely manner, in accordance with Brightstar policies.
- Use Brightstar systems, devices, and networks for appropriate business purposes.

### We Do Not Take Chances with Integrity

What do we mean by assets? Our assets include:

- **Brightstar property** — the equipment and tools we use to do our jobs
- **Brightstar products** — the goods and services we sell
- **Brightstar funds** — the monies we collect or spend on behalf of Brightstar
- **Brightstar information** — all non-public information about our business activities, such as strategic or marketing plans or expansion opportunities
- **Brightstar intellectual property** — patents, copyrights, trademarks, and trade secrets
- **Brightstar licenses** — the privilege granted to Brightstar to allow us to participate in the lottery business



### Responsibility in Action

Use our electronics systems responsibly and sensibly – and primarily for business purposes. While some limited personal use of the internet and email is allowed, follow the law and Brightstar policies and make sure your personal use does not interfere with your job responsibilities.

## Confidential Information

Information about our business, products, processes, and know-how is a significant Brightstar asset, but it could quickly lose value if inappropriately disclosed. We all play a role in protecting Brightstar's confidential information along with any confidential information others have disclosed to us.

### Responsibility Starts with You:

- Understand what kind of information you need to keep confidential and follow our internal safeguards to protect it. When in doubt, assume that information is confidential.
- Ensure that all Brightstar confidential information is marked appropriately (for instance, "Confidential" or "Restricted-Confidential").
- Guard against the accidental loss of confidential information – for instance, do not post it online, store it on an unsecure system, leave it visible in public places, or discuss it in public.
- Only disclose confidential information if you are authorized to do so, and the recipient is authorized to receive it, and such disclosure is made subject to an appropriate and active agreement (for example, a Non-Disclosure Agreement).
- Protect confidential information that belongs to other companies by complying with any agreements Brightstar has signed to protect the confidential information of others.
- Do not share with any Brightstar employee or use any confidential information from a former employer.

## We Do Not Take Chances with Integrity

Treat as confidential any information related to Brightstar or our business partners that is not available to the public.

This includes non-public:

- Information about finances, products, inventions, contracts, or business plans
- Information that provides an economic or competitive advantage
- Technical data related to Brightstar offerings or how we operate
- Information that could affect the price of stock (see Insider Trading section)

### Responsibility in Action

While at work, you might come across confidential information that was not intended for you to see. You might receive an email by accident, or you might find a confidential document left accidentally on the printer.

Remember that all Brightstar employees sign confidentiality agreements at the start of employment. If the confidential information is Brightstar confidential information, take action – notify the Brightstar owner immediately or give it to your supervisor. If the information is confidential information of a third party, notify the Legal Department immediately.



## Intellectual Property

Brightstar’s intellectual property makes us who we are and is extremely valuable to our success. Our copyrights, patents, trademarks, and trade secrets protect our intellectual property, and we need to follow our safeguards and use our intellectual property appropriately to ensure its value is not lost.

### Responsibility Starts with You:

- Respect intellectual property that belongs to others. Never use or copy software, documentation, graphics, artwork, confidential information or publications, whether from the internet, a former employer or anywhere else, unless you are sure that Brightstar has the right to do so.
- Disclose all new ideas and inventions developed or created to your supervisor and the IP Legal Department.
- Notify your supervisor if you think that Brightstar’s intellectual property or the intellectual property of a business partner is in jeopardy.
- Never comment on another party’s intellectual property unless working under the direction of the Legal Department.
- Do not license or provide Brightstar intellectual property to any third party unless you are authorized and the appropriate agreements from the Legal Department are in place.
- No development activities should be performed with, by, or for any third party unless the appropriate agreements from the Legal Department are in place.

### We Do Not Take Chances with Integrity

Here are some examples of Brightstar’s intellectual property:

- |                                    |                          |
|------------------------------------|--------------------------|
| • Computer software                | • Processes and know-how |
| • Engineering designs and drawings | • Marketing plans        |
| • Research and development plans   | • Graphics and artwork   |
|                                    | • Game names             |
|                                    | • Product documentation  |

## Lottery Licenses

Brightstar and some of its employees hold lottery licenses that allow us to operate in our industry and to maintain these we must meet certain standards and avoid certain actions. If we fail to live up to our obligations, we could risk losing either the Company’s licenses, individual licenses, or both – jeopardizing our ability to continue operations.

### Responsibility Starts with You:

- Know and comply with the rules and regulations that are associated with your job duties in the jurisdictions in which you work.
- Contact a listed resource if you think that Brightstar or one of its employees is not meeting a regulatory obligation.
- Involve the Compliance Department in any interactions with a lottery regulator.
- If you are a licensed individual, cooperate with all regulatory and Compliance requests to ensure that your license remains in good standing.

### Learn More:

[Compliance.Licensing@brightstarlottery.com](mailto:Compliance.Licensing@brightstarlottery.com)



A woman with blonde, wavy hair is shown from the side, looking at a smartphone. The phone screen displays a lottery app interface with the text "CONGRATULATIONS! You won \$20.00". The background is a blurred outdoor market stall filled with various colorful flowers and plants.

**We are responsible for  
conducting business ethically.**



## Fair Competition

Competition and antitrust laws are designed to promote a fair marketplace. At Brightstar, we compete vigorously and responsibly. We comply with applicable competition and antitrust laws in jurisdictions where we conduct business.

### Responsibility Starts with You:

- Never discuss pricing or business strategies with a competitor.
- Never make a verbal or written agreement with a competitor that sets prices, limits options, or allocates customers or markets.
- Gather publicly available information about competitors with integrity.
- Recognize that the competition and antitrust laws are complex and contact the Legal Department if you need guidance.
- If a competitor proposes any agreement, contact the Legal Department immediately.

### Responsibility in Action

Gather information about competitors the right way, and never use unethical or illegal methods. If someone offers you confidential information about a competitor's pricing or business, refuse the offer and contact the Legal Department immediately.

### Learn More:

[Antitrust Global Policy](#)

## We Do Not Take Chances with Integrity

The following types of agreements are always prohibited:

- Fixing or controlling prices
- Allocating products, markets, or territories
- Establishing resale prices of a product
- Conditioning the sale of products on the agreement to buy other Brightstar products





## Bribes

Conducting business responsibly means never engaging in bribery. Simply put, we do not give or accept bribes — directly or indirectly — anywhere we conduct business. Without exception, we comply with applicable laws that prohibit bribery and improper payments. Brightstar’s Anti-Corruption and Ethics (ACE) Policy provides detailed guidance to assist each of us to conduct business with integrity and high ethical standards.

### Responsibility Starts with You:

- Never offer, give, solicit, or accept bribes, kickbacks, or any other improper benefits to or from anyone, whether in a commercial setting or with a government employee or official.
- Do not use a third party to work around the law or our ACE policy.
- Follow our ACE Policy and GET-GO Process and never provide gifts, meals, entertainment, travel, or any other item of more than nominal value to a government official without pre-approval.
- Do not use charitable or political contributions to improperly influence government officials or obtain business advantages from them.
- Do not make facilitation payments.
- Follow all of Brightstar’s internal accounting controls when recording transactions, and ensure all transactions are authorized and recorded correctly.

### We Do Not Take Chances with Integrity

We do not permit facilitation payments, which are sums of money paid to a government official, or someone working with or for a government official, in an attempt to speed up a routine business task (for example, making a payment to speed up or ensure a license or to avoid a sanction).



### Responsibility in Action

We only work with third parties who comply with the law and our policies. We make all hiring decisions based on merit and never hire any individual or business entity in an attempt to gain favor or unfair treatment.

### Learn More:

[Anti-Corruption Compliance and Ethics Policy](#)

[Gifts, Entertainment, and Travel for Government Officials “GET GO” Process](#)

[Commercial Customer Gifts Entertainment Policy](#)

## Business Courtesies

Providing or accepting business courtesies, like gifts, meals, entertainment, and travel, can strengthen and foster our business relationships. But offering or accepting anything of value in a business context creates risk. We need to use good judgment, know the laws and policies that apply, act responsibly, and avoid even the perception that we might be gaining or awarding business unfairly.

### Responsibility Starts with You:

- Comply with applicable laws, policies, rules, contract provisions, and customary practices that may apply to the customer or business partner.
- Understand that the rules are even stricter when working with government officials (see Bribes section).
- Do not request or solicit business courtesies or favors.
- Record all business courtesies given and received promptly and accurately in accordance with Brightstar policies.

## We Do Not Take Chances with Integrity

Always use good judgment when giving or accepting business courtesies (i.e., gifts, meals, entertainment, or travel).

If you wish to provide a business courtesy to a government official, then you must follow Brightstar's GET GO Process.

If you wish to provide or accept a business courtesy to or from a representative of a commercial customer, you must comply with the Commercial Gifts and Entertainment Policy. In addition, you must review the Commercial Bribery section of the Brightstar ACE Policy and comply with the following guidelines:

1. Make sure giving or accepting the business courtesy does not violate applicable law or contracts or policies governing the recipient or the provider.
2. Business courtesies should be reasonable and for a legitimate business purpose.
3. Do not give or accept cash or cash equivalents.
4. Business courtesies should not be intended to influence a business decision and should not appear to others to be so intended.
5. Business courtesies should always be recorded and given and accepted openly, not secretly.
6. If you have questions, contact your supervisor and seek guidance from the Brightstar Legal Department.

## Responsibility in Action

Making decisions about business courtesies is not always simple, and you may need to work with the Company to find the best solution.

For example, we would typically not accept a business partner's offer to pay for travel and accommodations related to training and education. But what if attending helped you build a key business relationship?

### Learn More:

[Anti-Corruption Compliance and Ethics Policy](#)

[Gifts, Entertainment, and Travel for Government Officials "GET GO" Process](#)

[Commercial Customer Gifts Entertainment Policy](#)

## Global Trade

As a global company, our business depends on our products or technology crossing national borders. We are committed to complying with applicable export and import laws (laws which govern the export or import of certain products, services, technical data, and software to other countries). We recognize that these laws vary, and we work with experts and local authorities to meet our obligations and avoid prohibited activity. We are also committed to complying with applicable economic sanction laws and laws that prohibit participation in or cooperation with restrictive trade practices or economic boycotts imposed by nations.

### Responsibility Starts with You:

- Familiarize yourself with the trade laws that apply to your job and know how to comply with them.
- Make sure you have the appropriate export or import licenses before you ship or receive products, spare parts, software, or other technology.
- Provide accurate and correct information in customs paperwork.
- Notify Brightstar's Global Trade Compliance Department if you receive any communication from a government official regarding the export or import of any Brightstar products, spare parts, software, or other technology.

### We Do Not Take Chances with Integrity

Here are some items related to our business that are covered under the export and import laws:

- Any machines and lottery terminals
- Parts
- Software
- Source code
- Samples
- Prototypes
- Demonstration items

### Responsibility in Action

Watch for red flags that could indicate a failure to comply with export or import laws, including:

- Reluctance to offer information about the end-use of the product
- A sale for cash
- Declining routine installation, training, or maintenance services
- A vague or unusual shipping destination



## Anti-Money Laundering and Counterterrorism Financing

Money laundering allows criminals to disguise the source of illegal funds. At Brightstar, we have an Anti-Money Laundering (or “AML”) and Counterterrorism Financing policy and other procedures and controls in place to identify and prevent money laundering and terrorist financing.

### Responsibility Starts with You:

- Be alert to transactions that involve large amounts of cash.
- Exercise due diligence if you work in areas that are high risk for money laundering and terrorist financing and seek guidance when necessary.
- Report any suspicious activity to the Compliance Department immediately.
- Comply with applicable know-your-customer requirements.

### We Do Not Take Chances with Integrity

Money laundering happens when criminals try to make funds obtained by illegal activities look legitimate. In some areas of our business, Brightstar is the operator of the lottery activity, dealing directly with players and the accounts that hold player funds. Employees in these areas of the business should pay special attention to Brightstar’s AML and Counterterrorism Financing policy and procedures.

#### Learn More:

[Anti-Money Laundering Policy](#)

### Responsibility in Action

To avoid money laundering risks, we conduct business only with reputable and trustworthy customers and business partners. We rely heavily on our management teams to closely monitor our relationships to ensure compliance with our anti-money laundering procedures and controls.

If you work in a business area that deals directly with player funds, report any instances of suspicious transactions or fund-related behavior. You can identify the right resource in the operational guidelines for your business.



**We are responsible for separating  
personal interests from work.**

## Conflicts of Interest

Conducting business responsibly means avoiding conflicts of interest or even the appearance of a conflict of interest. A conflict of interest occurs when your personal interests interfere or may interfere with Brightstar's interests, your loyalty is divided between Brightstar's interests and your own, or when you take actions or have duties which make it difficult to objectively and effectively perform your work for Brightstar.

### Responsibility Starts with You:

- Avoid interests, activities, or relationships that interfere with Brightstar's interests or with your ability to be fair and objective in your role at Brightstar.
- Never work for or assist a competitor of Brightstar or compete against Brightstar in any capacity.
- Assist customers and business partners only as approved by your supervisor. Do not accept payment or benefits from another person or business for work you perform at Brightstar.
- Do not participate in or attempt to influence any Brightstar-related decisions or business dealings that could personally benefit you, someone close to you, or the competitor, customer, or business partner involved.
- Do not take personal advantage of business opportunities that would otherwise be available to Brightstar, and do not share those opportunities with anyone outside of Brightstar.
- If someone close to you works for or assists a competitor, customer, or business partner, disclose the situation to your supervisor and the Legal Department. This includes relatives, members of your household, close friends, or romantic partners.
- Be aware that, due to the nature of our business, holding public or political office may require approval.

### We Do Not Take Chances with Integrity

Trying to decide if something is a conflict? Ask yourself: Would this relationship or activity cause a reasonable person to question whether I am working in the interests of Brightstar?

If your answer is yes, follow the guidelines in the Conflicts of Interest policy for disclosing any potential or actual conflicts of interest.

### Responsibility in Action

Personal relationships can create a conflict — or even just the appearance of one. If you are involved in a situation that might make it look like your loyalty is divided, disclose it to your supervisor and the Legal and Compliance departments. Remember, disclosing a conflict does not necessarily mean you have to end it. Often Brightstar can work with you to find ways to resolve any issues.

### Learn More:

[Gifts, GET GO & Conflicts](#)





## Insider Trading

Insider trading happens when people use inside (non-public) information to gain an unfair advantage when trading securities. Because this threatens the integrity of the financial markets, there are strong legal prohibitions against it. We cannot buy or sell any securities of a company or provide tips to others to trade in securities if we know inside information about the company (whether that company is Brightstar, a customer, or a business partner).

### Responsibility Starts with You:

- Do not buy or sell Brightstar securities or the securities of any of our customers or business partners if you have access to inside information.
- Do not disclose inside information to anyone.
- Do not assist anyone with buying or selling securities using inside information.
- Know how the Securities Trading Policy applies to you and review it carefully before trading securities.

## We Do Not Take Chances with Integrity

Inside information is information that is not available to the public and that a reasonable investor is likely to consider important in making a decision to buy, sell, or hold a security.

Inside information can be positive or negative and can involve any aspect of a company's business. The security involved can include stock, bonds, or options.

If you are not sure whether you have inside information, do not trade or tip, and consult the General Counsel or the Company Secretary.

Contact the General Counsel's office if someone you do not normally work with asks you to share insider information.

### Responsibility in Action

Brightstar's ordinary shares are publicly traded on the New York Stock Exchange. Depending on your role at Brightstar, you may be subject to additional trading restrictions such as "blackout periods." Take these restrictions seriously. Violations of the insider trading laws can result in severe penalties and fines for individuals and for Brightstar.

### Learn More:

[Securities Trading Policy](#)





**We are responsible for accurate  
and transparent financial  
records and disclosures.**



## **We Do Not Take Chances with Integrity**

To promote our culture of integrity, we have a Code of Ethics for the Company's principal executive officer, principal financial officer, principal accounting officer or controller or any persons performing similar functions, which sets our high ethical standards and discourages misconduct. Our Code highlights the importance of our commitment to integrity while also recognizing the highest levels of accountability and commitment from the highest-level officers within our Company.

### **Responsibility in Action**

As a global company, we must comply with different laws around the world that govern how and when we make certain financial disclosures.

We take compliance with these laws very seriously and continuously monitor and evaluate our controls to ensure that we meet the requirements that apply to us. If you are asked to take training as part of your job, pay close attention to what you learned and then apply it to your work.

## **Financial Integrity**

It is our responsibility as a public company to provide consistent, full, and fair financial disclosures. We are able to do this, in part, due to our strong system of internal controls. Good financial reporting not only enables us to comply fully with the law, but it also enables us to make the most responsible and informed decisions about our business.

### **Responsibility Starts with You:**

- Be thorough and honest when recording and disclosing transactions.
- Never falsify a record or hide the true nature of a transaction.
- Follow Brightstar policies and use common sense when submitting or approving expense reports.
- If you have concerns that something has been reported or disclosed incorrectly – whether intentionally or unintentionally – report it immediately to your supervisor or one of the listed resources.

## **Records Management**

We create and manage our records and information responsibly, in compliance with the law and Brightstar policy.

Retain, delete, and destroy all records in accordance with the Records Retention Policy.

Be alert to special circumstances. For instance, the Legal Department may issue a hold order (an instruction to save and not delete particular records) – if so, be sure to follow the instructions.

### **Responsibility in Action**

Be professional, accurate, and thoughtful whenever you create a record. Whether you are leaving a voicemail, writing a memo, or sending an email, always remember that your message or words might be reviewed in the future without background or context.





**We are responsible for consistent  
and thoughtful communication.**



## Strategic Communication

At Brightstar, we understand the importance of communicating accurately, consistently, and strategically with the public, including our customers, business partners, the media, and investors. As part of this responsibility, only certain individuals within Brightstar are permitted to speak on Brightstar's behalf.

### Responsibility Starts with You:

- Do not make statements to the media about any aspect of Brightstar's business if you do not have permission to do so.
- Handle outside inquiries as follows:
  - If you receive an inquiry from a reporter, contact a member of the Global Communications Department immediately.
  - If you are contacted by a lottery regulator, contact the Compliance Department.
  - If you receive a non-routine inquiry from a governmental agency, contact the Compliance or Legal Department immediately.

### We Do Not Take Chances with Integrity

Remember, any time you communicate about Brightstar, whether at work or in your personal life, you represent Brightstar.

Keep in mind that what you say may reflect on Brightstar — negatively or positively — and act accordingly.

## Responsibility in Action

Here are some examples of situations when our strategic communications policies might apply:

- While representing Brightstar at a trade show demonstrating products to customers, you are approached by a gaming magazine to discuss the hot new game . . .
- The lottery jackpot is unusually large and people are flocking to get lottery tickets. You are out at a retailer servicing a terminal and the local TV station happens to be filming for the evening news. They ask you if the jackpot will hit tonight . . .
- A national media outlet is doing a story on the legalization of internet gaming. You receive a call asking for comment on whether Brightstar sees the internet as the new frontier for gaming . . .

In situations like these, it's important to follow Company guidance. If you find yourself in a situation similar to one of these, remember not to provide thoughts or insight. Simply respond politely by saying that you are not authorized to talk about Brightstar business at this time and refer the reporter to the Global Communications Department. The department's 24-hour media line is:

Toll-free in the U.S. and Canada:

1-844-448-7452

All other regions: 1-401-392-7452



## Social Media

Social networking is a fast-moving public forum where it is not always possible to control how information is used or shared, how long it is kept, or how it is interpreted by others. We need to be cautious in our use and recognize that even our personal activity on social media might, in some cases, affect Brightstar, our customers, or our colleagues.

### Responsibility Starts with You:

- Never share confidential or insider information about Brightstar or any of our customers or business partners while social networking.
- Be respectful when posting on social media sites and never use language that is or could be considered discriminatory or defamatory.
- When social networking on your personal time, make it clear that your opinions are your own and do not imply that you speak for Brightstar.
- Never speculate or comment on Brightstar's business performance online.

### We Do Not Take Chances with Integrity

Use this checklist to ensure that your social networking practices will be appropriate:

- Understand and respect your audience
- Use the appropriate disclaimers
- Comply with copyright law
- Understand that Brightstar has the right to monitor anything you might post about Brightstar
- Avoid discriminatory or retaliatory statements
- Do not share confidential or insider information
- Do not comment on legal matters pertaining to Brightstar
- Comply with Brightstar Social Media Guidelines

### Responsibility in Action

Using technology can help build strong networks but keep it professional. Use business networking tools, like LinkedIn, to keep in touch with business associates but remember that customers, vendors, regulators, and others in contact with the Company often have access to the online content you post.





**We are responsible for demonstrating positive corporate leadership in our communities and our industry.**



## Responsible Gaming

Brightstar is committed to providing a fair and positive lottery experience that protects players from the adverse effects of gambling. We understand that educating the public about how to participate in lottery in a smart and positive way is critical to the success of Brightstar and ultimately contributes to the success of the whole industry.

### Responsibility Starts with You:

- Understand and honor, through your personal actions, the Company's commitment to responsible gaming. Brightstar's responsible gaming approach and governance can be found in Brightstar's Responsible Gaming Policy.
- Ensure any marketing you control follows solid principles of responsible marketing as outlined in the Advertising and Marketing Code of Principles.
- Pay close attention to your daily activities at Brightstar and apply what you learn from the Company's mandatory Responsible Gaming training.

## Modern Slavery

Brightstar will not tolerate modern slavery and will not support it anywhere in our business or supply chain. Brightstar is committed to implementing effective systems and controls to avoid tolerance of human rights violations related to our operations and supply chain, and to reduce the risk that we do business with companies that practice or tolerate such violations.

### Responsibility Starts with You:

- If you are a supervisor, ensure that your employees have freely chosen their jobs and are free to leave if they choose, and observe your employees' working conditions.
- Watch for warning signs of slavery, including by business partners. This may happen several steps down the supply chain, such as when a supplier switches to a lower-cost vendor or a lower-cost operation location.

## We Do Not Take Chances with Integrity

Modern slavery is a term used to describe serious violations of human rights where people are exploited for personal or commercial gain through the use of coercion, threats, violence or deception. This includes people who are forced to work, often for no or low pay. They are not free to leave, and their identity papers or wages may be withheld.





## Environmental Responsibility

As a global company, Brightstar is committed to complying with accepted environmental practices. We always meet or exceed applicable legal and certification requirements. We strive to continually improve our environmental management system and minimize the creation of waste and pollution. We have achieved excellence in this area and have been certified by ISO14001 at several of our main facilities.

### Responsibility Starts with You:

- Follow the environmental requirements that apply to your job.
- Never falsify test results or tamper with monitoring systems or sensors.
- Report any potential environmental hazards as quickly as possible.



## Volunteering and Charitable Contributions

We maintain both corporate and employee driven community activities. Through our corporate activities we support community organizations where we operate. The social impact committee provides governance over corporate giving. We encourage employee driven community activities through volunteerism and matching gifts. Community organizations must align with Brightstar's values and Sustainable Development Goals.

### Responsibility Starts with You:

- If you are involved in community activities, take advantage of Brightstar's programs to support those interests.
- Follow all policies and procedures when requesting that Brightstar support a charitable contribution or sponsorship.

### Responsibility in Action

Brightstar supports employee activities through its matching gifts policy, supporting days off for qualifying volunteerism, and grants to organizations where employees volunteer.

## Political Activities and Contributions

At Brightstar, we support your right to participate in political activity in your personal time. Participation in political activity includes voting, monetary and in-kind contributions, and volunteering. However, it is important that we keep our business separate from the political process and comply with all laws that govern corporate political activity.

### Responsibility Starts with You:

When participating in the political process:

- Never use Brightstar assets, including funds or facilities, to support your personal political causes or candidates.
- Know that Brightstar will never reimburse personal political contributions.
- Understand that Brightstar will not treat you differently based on your political affiliation or any personal political contribution you make or do not make.
- Comply with applicable laws and Brightstar contracts of the jurisdictions where you want to make political contributions.

## Participating in Lottery

We are in a unique business—one that requires us (and our family members) to comply with rules that limit when and where we can play the lottery. As members of Brightstar, we commit to understanding these rules and complying with them.

### Responsibility Starts with You:

#### When playing the lottery:

- Never play or claim a prize from any lottery where Brightstar provides services or products or holds the role of Concessionaire or is a license holder.
- Understand that there may be rules on whether you, a family member, or anyone residing with you can play the lottery, depending on where you want to play.
- Make sure your family members and anyone residing with you know about any restrictions that may apply to them.

### We Do Not Take Chances with Integrity

In Italy, it is forbidden for Brightstar employees to play, either on the physical network or online, lotteries in the strict sense of the word — whether instant or deferred draws — and any other type of game — expressly including the Lotto game and other fixed-odds numerical games — in which Brightstar provides services or products or holds the role of Concessionaire. This prohibition also applies if participation in the online game takes place through a gaming account opened with a Concessionaire not belonging to the Brightstar Group.

Notwithstanding the above, in Italy, Brightstar employees are also prohibited from opening a gaming account with gaming concessionaires for remote gaming collection belonging to the Brightstar Group, except where the opening of the gaming account is necessary for work reasons, is permitted by the laws and contracts in force and has been authorized in advance by Brightstar.

### Responsibility in Action

Brightstar employees are prohibited from the following activities:

- You may not participate in, claim, or receive benefit from any lottery game sold by a customer to which Brightstar provides services or products

### Learn More:

[Participation in Lotteries](#)





**We are responsible for voicing a concern.**



## Responsible Employees Raise Concerns

At Brightstar, we hope that violations of our Code will not happen. But they may, and the sooner we become aware of them, the sooner we can start working to resolve them. If you see something that does not feel right or that you suspect is a violation of our Code, it is important and essential that you report it. Raising a concern is not always easy, especially if it involves a friend, a co-worker, or a supervisor, but it is always the right thing to do. As an employee, you have a duty to cooperate with company investigations. All reports are taken seriously and investigated to ensure any violations are dealt with appropriately.

### How can I report a concern?

It is always a good idea to start with your supervisor. If you need additional support, Brightstar has several other resources in place to help you:

**Compliance Department**  
Call: 1-401-392-7600

Write: Compliance Department, Brightstar  
10 Memorial Boulevard  
Providence, RI 02903

Email:  
[compliance@brightstarlottery.com](mailto:compliance@brightstarlottery.com)

#### Integrity Line

The Integrity Line, managed by an independent provider, is a confidential way to anonymously report activities that may involve unethical or unlawful conduct.

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 [www.business.att.com/bt/access.jsp](http://www.business.att.com/bt/access.jsp) and then call 1-888-807-4832

Integrity Line Reporting Portal:  
[brightstarlottery.integrityline.com](http://brightstarlottery.integrityline.com)

**Legal Department**  
1-401-392-5805  
[Legal@brightstarlottery.com](mailto:Legal@brightstarlottery.com)

Global People Services  
1-855-446-6947  
[GlobalPeopleServices@brightstarlottery.com](mailto:GlobalPeopleServices@brightstarlottery.com)

## Policies and Procedures

Brightstar maintains policies and procedures that supplement the principles in our Code.

### Where Can I Get a Copy of our Code?

Our Code may be downloaded from [www.brightstarlottery.com](http://www.brightstarlottery.com) or on the Compliance tab on [www.insidebrightstar.com](http://www.insidebrightstar.com).

## Our Non-Retaliation Commitment

It is important to always remember that Brightstar will take your report seriously and you will not face retaliation for raising concerns in good faith. We do not discipline, discriminate, or retaliate against anyone who makes a good faith report or who cooperates in any investigation or inquiry regarding such conduct, regardless of the outcome. Brightstar will respect the confidentiality of individuals who make a report or participate in an investigation. If we discover violations of the Code, Brightstar will take corrective action, such as disciplinary action—up to and including termination of employment—for individuals deemed accountable.

### Learn More:

[Whistleblower Policy](#)



