
SUSTAINABLE PROCUREMENT POLICY

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1. PURPOSE

This policy establishes guiding principles for responsible procurement practices, ensuring that environmental, social, and governance (ESG) sustainability aspects are taken into account in the procurement process and throughout the Company’s entire global supply chain.


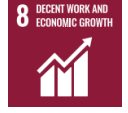


This policy supports the delivery of Brightstar Lottery’s (Brightstar) sustainability strategy, which is guided by three key elements: Empowering Our People, Collaborating with Partners, and Preserving the Planet.

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 the sustainable procurement sphere of impact, which supports two of the Company’s three sustainability pillars — Collaborating with Partners and Preserving the Planet.

At Brightstar, sustainable procurement centers on selecting responsible suppliers who prioritize environmental stewardship and ethical labor practices.

The Company’s sustainable procurement initiatives support four Sustainable Development Goals (SDGs), as defined by the United Nations (UN). They include:

SDGs	
	<p>Goal 7: Affordable and clean energy Ensure access to affordable, reliable, sustainable and modern energy for all.</p>
	<p>Goal 8: Decent work and economic growth Promote inclusive and sustainable economic growth</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 entities, affiliates and facilities worldwide. The Company will engage stakeholders including suppliers, employees, and communities to promote transparency and continuous improvement in responsible sourcing practices.

3. REFERENCES

Regulatory references

This policy supports the following treaties of international law and standards by applying their founding principles:

- UN Global Compact
- UN Universal Declaration of Human Rights
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- United Nations (UN) Guiding Principles on Business and Human Rights
- International Bill of Human Rights
- Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act
- ISO 14001 Environmental Management Systems
- ISO 20400 Sustainable Procurement

Internal references

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

- Brightstar's Supplier Code of Conduct
- Brightstar's Code of Conduct
- Brightstar's Environmental Policy
- Brightstar's Conflict Minerals Policy
- Brightstar's Safe and Healthy Work Environment Policy
- Brightstar's Product Responsibility Policy
- Brightstar's Human Rights Policy
- Brightstar's Global Sustainability Policy

4. PRINCIPLES

Sustainable Procurement

The primary goal of Brightstar's sustainable procurement program is to procure environmentally friendly, energy efficient, and human-rights-aligned products and services



that help the Company achieve its targets. Through this policy, Brightstar intends to make its operations more sustainable by:

- Upholding laws and regulations of respective countries in which Brightstar operates;
- Advocating economic, social, ethical and environmental practices;
- Mitigating risk associated with its procurement process; and
- Raising awareness with its suppliers and communicating the policy with its stakeholders.

Brightstar understands that improving its procurement processes is a continuous journey and recognizes the efforts suppliers take to contribute toward a more sustainable future.

Environmental responsibility

Brightstar expects its suppliers to uphold high environmental standards, in line with Brightstar's Environmental Policy, and Product Responsibility Policy. Specifically, suppliers are expected to ...

- Adhered to all applicable environmental laws and regulations in respective countries/jurisdictions.
- Engage with suppliers that adhere to international standards such as ISO 14001, if applicable.
- Contribute to environmental objectives stated in Brightstar's Environmental Policy, such as:
 - Reducing waste and improving recycling efforts by supporting a circular economy model and replacing materials with lower environmental impact;
 - Mitigating the use of hazardous materials;
 - Reducing greenhouse gas and other emissions harmful to the environment.

Brightstar is committed to implementing corrective actions in cases where suppliers are non-compliant with existing environmental requirements. These actions may include third party on-site audits, if deemed necessary. Brightstar requires all direct material suppliers to comply with the European Union directive on the restriction of certain hazardous substances in electrical and electronic equipment (RoHS) (2015/863/EU) (RoHS 3), as published and amended.

Business Ethics and Regulatory Compliance

It is imperative that Brightstar ensures suppliers throughout its supply chain conduct business with integrity and comply with all laws and regulations. In addition, Brightstar is committed to Supplier Relationship Management and fair, transparent payment practices, ensuring responsible management of supplier relationships and timely, equitable payment terms.

When engaging suppliers, Brightstar employees should refer to the guidelines outlined in Brightstar's Supplier Code of Conduct, which covers global trade, antitrust, whistleblower protections, compliance with global anti-corruption laws, compliance with global anti-tax



evasion laws, media, business courtesies, conflicts of interest, insider trading and business continuity.

Human Rights

Brightstar expects suppliers' adherence with all applicable laws, in accordance with the principles of the International Labor Organization, the UN Global Compact and the UN Universal Declaration of Human Rights. Brightstar is continuously mindful that its activities impact the communities in which the Company operates. All Brightstar employees are expected to be good partners by actively engaging in communication with stakeholders and undertaking efforts to positively impact local development.

To ensure participants in Brightstar's supply chain consider the health and safety of employees, when engaging suppliers, the latter should ensure the adoption of a health and safety policy, where applicable, aimed at maintaining and guaranteeing a safe workplace. Brightstar is also committed to promoting non-discrimination and inclusivity throughout its value chain, ensuring workers are treated with dignity and respect, and fostering equal opportunities for all individuals involved in the supply chain.

Human Capital

Brightstar is committed to fostering a decent work environment across its value chain. The Company also guarantees secure employment, fair and adequate wages, and encourages social dialogue. In addition, Brightstar respects freedom of association and supports works councils, consultation rights, and participation rights, and collective bargaining to strengthen employee representation.

These principles reflect Brightstar's dedication to protecting and empowering workers throughout its value chain, ensuring dignity, fairness, and respect in all business relationships.

Conflict Minerals

As described in its Conflict Minerals Policy and Supplier Code of Conduct, Brightstar is committed to identifying, reducing and eliminating the use of conflict minerals supplied to the Company. Brightstar's due diligence efforts to ensure compliance with a conflict mineral free supply chain include:

- Ensuring each supplier complies with the Company's Supplier Code of Conduct by adopting policies, procedures and due diligence management systems designed to prevent conflict minerals from entering the supply chain.
- Engaging with each supplier's own upstream suppliers and supply chain to determine the source and chain of custody of any product(s) that may contain conflict minerals.
- Identifying products containing conflict minerals and providing plans for mitigation and/or remediation to remove conflict minerals from said product(s).



- Identifying the presence of conflict minerals in suppliers' products by requiring they complete and submit the Conflict Minerals Reporting Template (the "CMRT") annually, which promotes supply chain transparency and identifies the smelters and refiners utilized by each supplier in the delivery of their product(s).

5. IMPLEMENTATION AND MONITORING

In order to verify implementation and monitor the effective application of the policy, specific periodic monitoring mechanisms will be established, such as regular audits, supplier assessments, and reporting mechanisms. Key performance indicators (KPIs) will be defined for environmental aspects, respect for human rights, and payment practices.

6. 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). To ensure that it is properly understood by all Brightstar employees, the Company intends to offer training activities to promote awareness of the principles contained herein.

7. ROLES AND RESPONSIBILITIES

The Senior Vice President (SVP) of Global Supply Chain owns this policy, as a member of the Sustainability Steering Committee (SSC), and is accountable for its implementation and for monitoring compliance across all operations. As a member of the Sustainability Steering Committee (SSC), SVP of Global Supply Chain contributes to defining the Company's long-term sustainability goals, ensures consistency of practices across regions, and promotes effective communication and the sharing of best practices.

The Global Sustainability team manages ESG matters and reports to the Senior Vice President of Branding, Communications and Sustainability, who also serves as Chair of the SSC. In this role, the Chair reports to the 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 guarantees that sustainable procurement stewardship remains embedded in decision-making and operational practices throughout the organization. Moreover, the Internal Audit (IA) department verifies compliance with the Policy.

8. REPORTING CONCERNS



Employees who are aware of perceived violations of this policy should immediately report the incident to any member of Brightstar’s management team, the 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 Company principles to the Integrity Line. Reports to the Integrity Line can remain anonymous, if desired.

9. 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
November 2023	Version 1.0	First release
February 2026	Version 2.0	Format change and content aligned to ESRS standards

10. 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.
CMRT	Conflict minerals reporting template, a standardized reporting tool used to identify smelters, refiners, and sources of conflict minerals in the supply chain.
Conflict Minerals	Minerals such as tantalum, tin, tungsten, and gold that may be sourced from conflict-affected and high-risk areas and may contribute to human rights abuses.
ESG	Environmental, social, and governance factors considered in business operations and decision-making.

ESRS	European Sustainability Reporting Standards, the EU's mandatory standards that define how companies must report comparable, reliable sustainability and Environmental, Social, and Governance information under the Corporate Sustainability Reporting Directive.
ILO	International Labour Organization, a United Nations agency setting international labor standards.
ISO 14001	International standards specifying requirements for an effective environmental management system.
ISO 20400	International standard providing guidance on integrating sustainability into procurement practices.
KPIs	Key performance indicators.
RoHS	Restriction of Hazardous Substances Directive (2015/863/EU), limiting the use of certain hazardous substances in electrical and electronic equipment.
SDGs	United Nations Sustainable Development Goals, a global framework for addressing environmental, social, and economic challenges.
SSC	Sustainability Steering Committee, responsible for guiding and overseeing Brightstar's sustainability strategy and initiatives.
Supplier Code of Conduct	A Brightstar policy outlining ethical, environmental, labor, and compliance expectations for suppliers.
UN Global Compact	A United Nations initiative encouraging businesses to adopt sustainable and socially responsible policies.



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