

Document Control

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Revision history			
Issue	Date	Author	Comments
1.0	01-MAR-2021	J. Luchauer	Initial Release
2.0	20-MAY-2025	J. Luchauer	Revision Due to Separation, remove Spinco related references

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OVERVIEW:

Brightstar maintains a long-standing commitment to player protection. This is accomplished through close relationships with customers, gaming regulators, research institutes, and advocacy groups that promote tools to prevent problem gambling. In addition, Brightstar supports Responsible Gaming (“RG”) organizations that address problem gambling and prevent underage gambling. Brightstar’s programs and initiatives are developed to emphasize responsible gaming in all stages of the business, from game design to customer training, and to ensure top quality and integrity of all products and services. Brightstar strives to earn and maintain the trust of its stakeholders worldwide through programs and solutions designed to promote fair play and comply with requirements and regulations on RG in all jurisdictions in which we operate.

PURPOSE:

This policy is designed to educate and inform our employees and stakeholders about our RG initiatives and commitment.

SCOPE:

This policy applies to all employees, internal consultants, contractors, and temporary personnel of Brightstar.

STRUCTURE

Brightstar’s Sustainability Program is comprised of four pillars: Valuing and Protecting Our People, Advancing Responsibility, Supporting Our Communities, and Fostering Sustainable Operations. Brightstar’s RG goal to develop programs and initiatives to minimize problem gambling can be found in the Advancing Responsibility pillar.

The Global Sustainability team has primary responsibility for ensuring the delivery and reporting of RG commitments across a wide variety of internal stakeholders.

GOVERNANCE

Oversight for the RG Policy and its resulting initiatives will be governed by an Executive Sponsor and a representative from each of the following business areas. The Executive Sponsor is the Senior Vice President overseeing Global Sustainability. This group will be called the RG Advisory Group.

Key Business Area
Compliance
Government Affairs
People & Transformation
Operations/Product
Communications
Marketing

The RG Advisory Group will meet at least once each year to discuss Brightstar's RG efforts and progress toward the Advancing Responsibility Pillar, approve the overall RG strategy and annual review, and provide insight into key projects for the year. The group's purpose is to bring all areas of Brightstar business together for a common RG goal, lend support and expertise of their teams, and ensure alignment with broader corporate goals.

As needed, the RG Advisory Group will support the development of topic-focused subject matter expert ("SME") working groups brought together to address current or emerging RG needs. The Global Sustainability team will support the RG Advisory Group by managing the flow of information and associated administrative tasks between the SMEs and communicating progress to the RG Advisory Group as deemed appropriate.

The following SME working groups will serve as the inaugural groups, with others to be developed as needed:

- Compliance- aligning efforts and collaborating among locations
- Cashless- balancing RG concerns with growing technology and stakeholder concerns
- Marketing- reviewing and implementing changes to the Marketing Code of Principles and the compliance process

OBJECTIVES AND ACTIVITIES

Brightstar's RG Program is administered through an RG Strategy and annual plan that address Brightstar's RG Program Objectives:

- To promote protective tools to prevent problem gambling and encourage positive play behaviors.
- To support RG organizations that address problem gambling.
- To prevent underage gambling.

Beyond Brightstar's RG goal to develop programs and initiatives to minimize problem gambling, eight commitments have been identified.

1. Work with appropriate stakeholders.
2. Generate internal awareness, education, and training
3. Incorporate RG tools into products and services
4. Offer operators the ability to monitor player behavior and minimize potential issues
5. Ensure all promotional activities comply with Brightstar's RG Code of Principles
6. Support customers with RG best practices
7. Align Brightstar's RG strategies with stakeholders' expectations
8. Report Brightstar's RG activities to key stakeholders

These commitments are supported by the following key areas.

Stakeholders

Brightstar will review its stakeholders annually in conjunction with developing its annual Sustainability Report. Brightstar considers a variety of internal and external groups as stakeholders and counts engagement with these groups as a necessary means to promote RG and continually improve Brightstar's RG efforts.

Stakeholders are particularly important for the development and execution of Brightstar's RG strategies, as well as maintaining accountability through reporting.

Training & Awareness

Employee training is divided into three categories: New Hire, All-Employee, and Job-Specific. New Hire training is a general awareness training that educates employees on the basics of RG and Brightstar's commitment. New Hire training is completed by all new employees as part of the onboarding process.

All-Employee training is designed to build upon the basics of RG that all employees receive. Topic-focused mini modules are released to build upon employee's knowledge base. Topics may include deeper understanding of Brightstar's RG features or focus on specific problem gambling topics such as co-occurring disorders or the behaviors of active problem gamblers. It may also include interactive or experiential learning to boost understanding of RG principles.

Job-specific training is developed as needs are identified. With employees across the globe working in a variety of roles, there may be a need for training tailored to certain job roles. For example, the B2C contact center employees interact with players and need additional expertise for handling players who are in an active state of problem gambling. The type of training needed for contact center agents is much different than a role that does not interact with players. As these needs are identified, Brightstar will develop specific training.

Ongoing education is critical to keeping RG top of mind for employees. As a company, Brightstar supports the awareness campaigns of our stakeholders through the AGA's RG Education Month, the NCPG's Problem Gambling Awareness Month, and the UKGC's Safer Gambling Week. These awareness campaigns provide educational opportunities for employees and our external stakeholders.

Products and Services

Brightstar understands the risk that our products and services may pose to a small portion of the population and the need for gambling companies to adopt features to address such

risk. Across Brightstar's product lines, we are committed to implementing RG practices when developing new products and services. Additionally, Brightstar responds to customer needs for RG solutions through innovation and staying abreast of industry best practices.

Code of Practice

Brightstar ensures that marketing materials align with our RG commitment through our Code of Principles. The Code of Principles guides employees to create materials that are responsible and follow the best practices developed by entities such as the World Lottery Association, United Kingdom Advertising Standards Association, and European Lotteries. A compliance process accompanies the Code of Practice to assert that an RG review has been completed.

Reporting

In addition to oversight reporting to the RG Working Group, Brightstar will report progress to all stakeholders annually in its Sustainability Report which is published online. Throughout the year, Brightstar will provide internal and external stakeholders with ad hoc status updates and reporting.

EMPLOYEE SAFER GAMBLING PROTECTIONS

While the number of Brightstar employees who interact with gambling directly is minimal, we understand that there may be increased risk for problem gambling by employees who work in the gambling industry.

Employee play and conduct is addressed in Brightstar's Code of Conduct, adherence to which must be certified by every employee annually. Additionally, the Employee Game Play Guidelines and Restrictions are listed on the Brightstar internal intranet under Compliance.

For employees who do find themselves in need of support for problem gambling, Brightstar's local People and Transformation partners can assist with the resources available for employees in that geographic location. Because benefits vary in the countries with which we operate, the resources are likely to vary.

DEFINITIONS

Brightstar -Brightstar and its affiliates and subsidiaries worldwide