
GLOBAL CHARITABLE GIVING AND COMMUNITY ENGAGEMENT POLICY

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1. PURPOSE

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 community engagement sphere of influence, which supports two of the Company’s three sustainability pillars — Empowering our People and Collaborating with partners.

At Brightstar, community engagement refers to the strategic goal of engaging communities by collaborating with organizations and supporting programs that foster skill development for the future workforce. The Company’s community initiatives support four Sustainable Development Goals (SDGs), 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 4: Quality Education Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all</p>
	<p>Goal 8: Decent Work and Economic Growth Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all</p>
	<p>Goal 10: Reduced Inequalities Reduce inequality within and among countries</p>



2. SCOPE

This policy applies to all Brightstar entities and affiliates, including in cases of mergers and acquisitions. Requests and charitable contributions that fall under section No. 6 of Brightstar's Government Affairs Policy (Political Contributions and Other Company Contributions) are excluded from this policy. Requests that are considered cause-related marketing are excluded from this policy.

3. REFERENCES

Standards

This policy supports the following treaties of international law and standards by applying their founding principles. Each term is defined in Section No. 10 (Definitions):

- ISO 26000 Social responsibility
- ISO 37001 Anti-bribery management systems
- ISO 30415 Human resource management
- Trust-based philanthropy
- IRS – United States government

Internal references

This policy, and its implementation, are supported by several Brightstar internal documents and policies. They include:

- Government Affairs Policy
- Code of Conduct
- Human Rights policy
- Anti-Corruption Compliance and Ethics (ACE) Policy
- Standard Industrial Classification (SIC) operating procedures
- Global Sustainability Policy

4. PRINCIPLES

Charitable Contributions

Charitable contributions through the global charitable giving program are reviewed and approved on a quarterly basis by Brightstar's Social Impact Committee ("Brightstar SIC"). Brightstar SIC's guidelines ensure that all approved charitable requests are aligned with the Company's global sustainability strategy. All requests must comply with integrity, anti-corruption and conflict of interest principles.

SIC guidelines

All requests for charitable contributions and sponsorships (including in-kind contributions, such as the provision of equipment, offices, office supplies, and employee time) shall follow the process outlined here:



- All requests shall be submitted via the online charitable application process, which is available through the Company's website (www.brightstarlottery.com).
- Brightstar's SIC will evaluate requests on a quarterly basis and respond to requestors via email.
- Requests will be evaluated based on criteria including, but not limited to, the following:
 - Whether the request relates to a properly qualified non-profit, tax-exempt, and/or registered charity or organization in a jurisdiction in which the Company operates.
 - Whether the requesting organization(s) comply with all applicable laws, including jurisdictional laws regulating charitable contributions and sponsorships.
 - Whether, outside the United States, applicants represent a registered charity with applicable charitable-tax codes and supporting documentation, all of which must be included in a request.
 - Whether potential sponsorships and charitable contributions align with the Company's core values and the SDGs identified in this document.
 - Whether there is adequate funding in the Company's community giving program budget.
 - Whether applicants represent organizations that discriminate based on age, sex, gender identity or expression, race, religion or belief, ancestry, national origin, citizenship, sexual orientation, marital status, pregnancy or parenthood, military or veteran status, medical condition or disability, or other legally protected status for the purposes of employment, volunteer participation, or the provision of services. Any organization that discriminates based on the above will not be considered.
 - Whether the request relates to a capital campaign. In general, Brightstar will not prioritize capital campaigns.
 - Whether requests that include events have been submitted at least 90 days in advance.

After School Advantage Program (ASA)

Since 1999, the Company has brightened the lives of young people through its flagship community initiative, the After School Advantage (ASA) program. ASA technology labs in communities worldwide provide students with access to science, technology, engineering, arts, and math (STEAM) educational opportunities, helping them develop knowledge and skills for future success.

Brightstar's ASA program provides non-profit community agencies with digital learning centers, addressing the evolving needs of today's young people. Proposals are accepted



and reviewed on a rolling basis. Qualifications for the program are available on the Company's website (www.brightstarlottery.com) and are limited to areas where Brightstar operates. Local Brightstar sites are responsible for selecting, executing, and paying for the ASA sites in their jurisdictions, after approval from Brightstar's SIC.

Community Engagement

Brightstar encourages employees to become involved in community engagement activities that support and enhance the Company's brand and/or reputation. Any organization that the Company or an employee group engages in an official capacity — including through an employee program — should reflect Brightstar's values. Brightstar reserves the right to deny payment to organizations that engage in discriminatory practices or pose risk to Brightstar's reputation. For this reason, due diligence shall be conducted on the organization before Brightstar, or an employee, engages with an organization in an official capacity. Employees participating in volunteer or community fundraising activities must adhere to Brightstar's solicitation policy, in the United States, and social media policies, as they apply to their respective countries.

Employees should not represent individual nor group involvement with a non-profit organization as corporate representation. While Brightstar supports employee efforts, there must be a clear distinction between employee-driven efforts and corporate activities. This is especially important from a financial funding perspective and in managing the expectations of the Company's community partners.

Community organizations should view funding as one-time investments and not commitments to continued funding. Further funding requires additional SIC approval. Local sites will engage with their communities as appropriate based on respective jurisdictional requirements and contract requirements.

5. IMPLEMENTATION AND MONITORING

This policy and associated programs fall under Brightstar's sustainability strategy, as defined in this document. Community efforts are reported publicly in Brightstar's annual Sustainability Report.

6. COMMUNICATION

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).



7. ROLES AND RESPONSIBILITIES

The Senior Vice President (SVP) of Branding, Communications and Sustainability has ultimate responsibility for this policy and its execution, as well as approval authority over charitable contributions within the scope of this policy and finance policies governing payments.

Brightstar's SIC provides governance over charitable contributions under the leadership of the SIC Chairman and SVP of Branding, Communications and Sustainability. The SIC is managed under internal operating guidelines.

The Director of Global Responsible Gaming and Community is responsible for the administration of this policy and its associated programs, under the direction of SVP of Branding, Communications and Sustainability, and has limited delegate authority for charitable payments.

8. REPORTING AND CONCERNS

Concerns or questions about charitable giving or community engagement may be addressed to communitygiving@brightstarlottery.com

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
August 4, 2022	Version 1	First release
November 24, 2025	Version 2	Format change and update due to Company sale.
April 2026	Version 3	Format change and content aligned to ESRS standards



10. DEFINITIONS, ABBREVIATIONS, ACRONYMS

The following table defines specific terms used in this policy.

Term / Abbreviation	Definition
ACE Policy	Brightstar's policy addresses integrity, anti-corruption, and ethical conduct principles.
After School Advantage (ASA)	Brightstar's flagship community program, which promotes STEAM education.
Capital Campaign	A targeted fundraising effort that takes place over a defined period or a campaign to fund new capital assets or improvements to existing assets.
Charitable Contribution	One-time or occasional support provided to organizations in response to the needs and appeals of charitable and community organizations, requests from employees, or in reaction to external events such as emergency relief situations.
Code of Conduct	Brightstar's policy outlining ethical standards and expectations for employee behavior.
Community Investment	Refers to long-term strategic involvement in, and partnership with, community organizations to address a limited range of social issues chosen by the Company to protect its long-term corporate interests and enhance its reputation.
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.
Government Affairs Policy	Brightstar's policy governing political engagement and government related contributions.
Human Rights Policy	Brightstar's policy defining commitments to respecting and promoting human rights.
In-Kind Contributions	Contributions or payments in the form of goods or services instead of money.
IRS	The Internal Revenue Service, a United States government agency responsible for tax administration and non-profit organization regulation.



ISO 26000	International guidance standard on social responsibility.
ISO 30415	International guidance standard on diversity and inclusion.
ISO 37001	International management system standard for anti-bribery.
Request	Refers to a proposal or application submitted through Brightstar's dedicated online portal for charitable contributions.
SDGs	United Nations Sustainable Development Goals, referenced by this policy.
Social Impact Committee (SIC)	A cross-functional group of business leaders who review charitable contributions and provide feedback on Brightstar's community and charitable giving strategy, governed by internal operating guidelines.
Trust-Based Philanthropy	A philanthropic approach emphasizing transparency, collaboration, and long-term relationships with beneficiaries.

W Montgomery

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