



CORPORATE
SOCIAL POLICY

For Responsible Gaming

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1. INTRODUCTION

CIRSA is a robust group of companies focused on the gaming sector: an industry providing diversion, fun, and entertainment. It can also fulfil an important educational role and bring positive effects to society, as demonstrated by various studies such as “Recreational Policies: culture, tourism, sports and recreation”, produced by the University of Deusto, or “Ludoliteracy”, from the Open University of Catalonia.

CIRSA was founded when gambling was legalised in Spain in 1978. Since then the Company has managed to stay ahead of market trends due to its commitment to innovation. This is how it has become a pioneering Group with an enormous capacity to adapt to new technologies. Its rooms, bingo halls, and casinos offer everything from classic table games such as poker, to electronic roulette, Sportium sports betting, and multigame machines, among others.

The professionalisation of the Company has led to the consolidation of profitable and steady growth in the nine countries in which the multinational operates, and has meant it remains fully compliant with its commitments when working in international markets.

CIRSA’s Corporate Social Policy outlines the Company’s general framework and action principles in relation to its Corporate Social Responsibility (CSR), a commitment that goes beyond laws and general rules as well as those specific to a fully regulated sector such as the gaming sector.

This document focuses on promoting value creation and encouraging collaboration with society, investors, clients, and the main communities and partners the Company interacts with.



2. CIRSA CSR POLICY OBJECTIVES

CIRSA operates its business sustainably for society, citizens, clients, employees, investors, and the communities close to its operational centres, providing an efficient, profitable, and quality service.

The Company is especially committed to improving society and well-being. This commitment is based on four action areas:

- Respect for ethics, integrity, and professionalism.
- Respect for the environment, both from an economic, and social and environmental standpoint.
- Job creation as an economic driver for society.
- Respect for human rights.

Similarly, CIRSA bases its corporate commitment strategy on promoting Responsible Gaming: something that is fully and deeply rooted in the core of its business.

Gaming can be a way for people to improve their social and emotional well-being – it enriches their environment and brings benefits with a positive impact on their professional and personal relationships.

The majority of the adult population enjoys this type of entertainment in a safe and responsible way as another one of their leisure activities. However, as the World Health Organization (WHO) states, there is a certain minority of users who for various reasons have difficulties relating to the recreational environment responsibly. In Spain this figure translates to 0.3% of the population (2017).

For CIRSA, as a Company operating in a regulated sector that generates high levels of employment, it is fundamentally important to give support to these people through the promotion of a culture of Responsible Gaming. We promote the proper use of recreational activities, providing the means required to detect and assess potential problem areas.

The Company develops activities in pursuit of this goal, and promotes a dialogue between the sector, public bodies, and other players making up the gaming value chain in order to encourage and guarantee a positive environment.

3. CROSS-CUTTING ACTION PRINCIPLES

The Company promotes the following cross-cutting action principles in pursuit of its corporate commitment objectives:

3.1 Transparency

CIRSA has a series of measures in place that aim to promote an authentic and transparent image:

- Sharing relevant and reliable information on the activities and actions the Company undertakes, both with the general public and internally.
- Producing and publishing financial and non-financial information on Company activities, and collaborating with independent external assessors such as auditors.

3.2 Responsible taxation, sustainable growth, and acquisitions protocol

In terms of responsible taxation, CIRSA commits to scrupulous compliance with current fiscal legislation in the various territories it operates in. It also commits to tax related decision-making based on a reasonable interpretation of applicable regulations and closely linked to the Company's activity.

In the same vein, the Company worked on the pilot phase, and went on to be a pioneer in, the introduction of the immediate supply of information (SII) or real-time VAT in Spain. This initiative instructs companies with a turnover in excess of six million euros to communicate the amount of VAT on all invoices issued and received every four days to the Tax Agency.

CIRSA bases its activities on a strategy of sustainable growth, taking into account the different actors and communities it interacts with when it comes to decision-making: from public authorities to clients and key stakeholders.

The Company also has a sustainable acquisitions protocol which takes into account the return of all operations, with a remit for the responsible constitution and acquisition of companies.

3.3 Commitment to employees

Employees are the driving force of CIRSA's operations, and are the main contributors of added value. That is why a commitment to employees is a priority of the Company's CSR Policy, promoted through the following principles:

- Respect for people and non-discrimination relating to race, nationality, social origin, age, gender, sexual orientation, ideology, or religion; or any other physical, emotional, or

social conditions.

- Fair and equal promotion of professionalism and professional development.
- Commitment to talent.
- Duty to the health and safety of employees.
- Promoting a fair remuneration policy.
- Promoting a work/life balance.



3.4 Commitment to clients

CIRSA promotes leisure and entertainment and as such views its business from a perspective of client needs and expectations. This is maintained through a firm commitment to providing the best service at all times. As such, it promises to promote well-being through the following actions:

- Transparent and clear communications.
- Promotion and dissemination of Responsible Gaming.
- Identification of future needs.
- Implementation of regular customer satisfaction metrics.
- Total responsibility for data confidentiality.
- Compliance with the applicable legislation, and notifying clients when necessary, to ensure their health and safety.
- Collaboration with associations and non-governmental organisations that fight against social addictions and promote preventive actions and treatment.

3.5 Commitment to investors

CIRSA establishes and maintains a strong ethical and transparent relationship with its investors, which is why it promotes measures to guarantee its commitments are fulfilled, such as:

- Equal treatment of all investors that are part of CIRSA, both current and potential.
- Providing information that ensures the informed participation of all investors.
- Providing reliable and up-to-date information on the Company's activities.

3.6 Commitment to the community

CIRSA is firmly committed to the community. The Company therefore conducts its business with respect and commitment to its environment, acting in an environmentally-conscious manner in the nine countries in which it operates.

CIRSA also works to create strong ties with communities close to its activity centres. To do so, it recognises their needs and concerns, and works hard to improve their quality of life by creating quality employment and promoting social actions.

3.7 Commitment to suppliers

CIRSA's relationships with the people or companies that act as suppliers is also a key element of its CSR policy. In this regard, the Company promotes a centralised system to process purchases on a global scale, with particular commitment to suppliers that are socially responsible.

The Company also promotes other actions such as:

- Adopting responsible practices in the supply chain.
- Implementing risk management, anticipation, and control mechanisms related to suppliers.
- Promoting collaboration between suppliers.
- Ongoing follow-up to ensure that all participants of the value chain comply with:
 - Business ethics.
 - Applicable laws, regulations, and procedures.
 - Transparent management.
 - Health and safety.
 - Equality.
 - Quality and safety of marketed products and services.
 - Strict respect for human and labour rights recognised by national and international legislation.
 - The environment.

3.8 Efficiency and the environment

One of CIRSA's priority objectives is protecting the environment. It has several initiatives in place that aim to reduce its environmental impact and to improve the efficiency of its centres. Some of these actions include:

- Reducing energy consumption and dependency by promoting efficiency through projects such as carrying out audits in halls and bingo halls; adopting measures to decrease electricity consumption, such as installing on/off switches on recreational machines and presence detectors; or the remote control of air-conditioning in casinos, among others.
- Purchasing renewable energy for employees and rooms.
- Responsible waste management.
- Commitment to environmentally-responsible manufacturing processes.



3.9 Innovation

Innovation is the concept that best defines CIRSA's identity and it has been a constant in all areas of the Company's value chain since it was founded. It is also important to note that the Company owns over six hundred industrial property registrations. Innovation is one of the Company's key strategies, as well as being a cross-cutting concurrent value across all relevant departments and in the activities it promotes. For this reason, the Company:

- Promotes research, development and innovation (R&D&I).
- Works on innovation projects based on sustainable models.
- Commits to disruptive technologies that help confront new challenges, and adapts to the changes and demands that are continuously emerging in our Industry.

4. SPECIFIC ACTION PRINCIPLES

In terms of its commitment to Responsible Gaming, the Company also applies the following specific action principles:

4.1 Detection of vulnerable situations to promote Responsible Gaming

CIRSA sees people beyond their role as clients. That is why it offers protection to users from risks that can be associated with inappropriate gambling, such as addictions and betting high values. It promotes the development of a Responsible Gaming culture through campaigns that encourage people visiting its establishments to take a measured approach to gambling, and to see this type of entertainment as a fun shared leisure experience and not something that may lead to economic or personal issues.

At the same time, CIRSA keeps its clients educated and informed on using this recreational setting inappropriately, and provides various resources to anyone who may need support.

In this regard, the Company has two phases of activity:

- **PREVENTIVE PHASE** (dependent on the Company's corporate commitment and promoted through the organisation's internal and external communication channels):

- Supporting research into potential abnormal behaviours and damaging effects.
- Training employees on awareness.
- Informing citizens, and players in particular, on the principles of Responsible Gaming and how they can apply them.
- Producing promotional materials, communications, and advertising, both in the public and private sphere, to encourage responsible participation in gambling.
- Promoting specific prevention plans, designed for every gaming type and environment.

- **ACTIVE PHASES** (dependent on the health system of each jurisdiction the Company operates in):

- Active collaboration between the Company and public bodies in promoting prevention and social awareness.
- Promoting specific activities according to the severity of the problem detected.
- Recognising compulsive gambling.
- Reinforcing self-exclusion, whereby voluntary registration prevents players from accessing a game.

4.2 Action principle on promoting social commitment internally

Social commitment is a value that impacts all levels of an organisation, and it is present throughout the Company's various strategies, operations, and internal policies. In this sense CIRSA promotes social commitment among its employees in two key areas:

- The promotion of responsible actions within the organisation, especially in terms of responsible innovation and improving the environment.
- The promotion of social projects with activities such as collecting toys and Christmas campaigns, and collaborating with social partners on specific projects in all countries where the Company is present.



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