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Growing with sustainability at the core



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Message from the chairman

Joaquim Agut Executive Chairman CIRSA

It is an honor to publish the first annual Environmental, Social and Governance (ESG) Report for our stakeholders. Growing sustainably has always been at the core of our strategy as what is best for our stakeholders is also best for CIRSA and our shareholders. The cornerstone of our business strategy fundamentally hinges upon a 360° sustainability vision which pursues to create longterm value for our local communities, our customers, our people, and the environment.

Far from being a company that puts financial performance at the forefront of its strategy in detriment of ESG factors, we strongly believe that integrating sustainability into the heart of our decision-making process is utterly important and provides a key strategic leverage which increases the value of our company.

Our business model is essentially based on our proximity to local communities and aims at adding significant value while promoting a sustainable leisure model and embedding a strong Responsible Gaming culture. At the same time, this is carried out in an environmentally friendly manner as a result of our low impact and highly efficient medium- and small-sized local facilities, far from the concept of large leisure developments with a significant environmental impact.

We have an extensive track record of dedicating human, technical and financial resources to sustainability and we use our core strengths and capabilities to demonstrate how business success and stakeholder value come together. We acknowledge that the competitiveness of our company and the health of the communities where we operate are strongly linked and adopt a marketbased approach to social value creation: benefiting society and business performance in a simultaneous way. Indeed, our commitment to creating societal value is deeply rooted in our purpose and has become an integral part of who we are and how we operate as a company. Our head of ESG is responsible for executing and overseeing the strategy and the objectives of our ESG strategy across all our business units, countries and procedures. His supervision is embodied through our four ESG experts, who are responsible for each of the three ESG dimensions and Responsible Gaming and have more than 10 years' experience in managing these areas.

Since the start of the pandemic, we have remained focused on delivering safe and resilient services and operations, setting our safety standards beyond the legal national requirements. We went above and beyond obtaining a responsible management of COVID-19 certification so as to guarantee the health of our people and collaborators and with the vision to set a culture of safety at all organizational levels. Indeed, we acknowledge that our human capital is our best asset and for this reason we have put a great deal of effort into achieving the best working conditions for our people.

At the same time, we have further progressed on our ESG initiatives, which denotes our strength to adapt and progress, regardless of any negative externality. In addition, we believe that each of us can play a role in advancing our inclusive culture, which we consider core to our strategy and business resilience. We are committed to driving an environment where all differences are appreciated and recognize that D&I are key enablers of sustainable value and crucial accelerators of our sustainable growth. To achieve a working environment where all practices are equitable, we work hard to embed Diversity & Inclusion in our daily interactions and drive positive change across the organization and the local communities in which we operate.

We strongly believe that to achieve economic sustainability in our business, we need a robust ESG strategy to guide us. For this reason, we integrate ESG into the core of our business model and acknowledge that it is a necessary step for our group to remain well equipped, competitive, and sustainable. One of our most significant achievements in 2021 was reaching 10,170 thirdparty partner facilities certified in Responsible Gaming in Spain in 2021 (58% of the total facilities in which we are present in the country). Indeed, keeping our customers safe when gaming is the foundation of our strategy and guarantees the sustainability of our business.

In addition, giving top priority to the reduction of our environmental impact helps us unlock operational efficiencies, increase our competitiveness, and foster lasting profitability. We constantly strive for incremental, continuous improvement in the way we do business and focus our efforts on enhancing our impact on society. Between 2015-2021 the Company reduced the scope 2 carbon footprint by 46%, fully aligned with our target reduction of a further 65% by 2030. Improved technology application and operational efficiencies were critical in helping us to reach such reduction. At CIRSA, we believe this is the way to move forward if we want to keep growing successfully.

I am also proud to highlight our constant commitment to our local communities, a unique value in CIRSA that impacts all the levels of the organization and is present in the different strategies, operations, and internal policies that we own. Through our gaming activity and corporate taxes, we have contributed with over 470 million euros to the socioeconomic development of the countries where we operate. Despite the challenges brought by the global pandemic, our staff's know-how and professionalism have continuously evolved through our targeted training and development programs, which are key to maintaining the high-quality standards of our services. It is our priority to be aware of every team member's skills and potential growth, so we can allocate the necessary resources to their training and development. During 2021, on average, each employee took almost 3 training courses during year. Going forward, we are committed to increasing this number by 40% in 2023.

We have a trustworthy reputation within the sector supported by robust tools and processes aimed at conducting our business in an ethical way. Underlying the business model, there is a best-in-class corporate governance model which guarantees that the company exclusively operates in regulated markets and ensures stringent compliance across more than 20 different regulatory frameworks involving environmental, social and Responsible Gaming regulations.

While these are great achievements, we are focused on continuous improvement and are fully committed to finding ways to do better and become the leaders of our sector, not only in terms of market share but in ESG practices. We have set short-, medium-, and long-term targets across many of our material ESG focus areas, which you can read more about in this report. Achieving these goals will require innovation, process improvement and strong leadership from our ESG champions.

We will continue to step up our efforts to increase Responsible Gaming, reduce our environmental impact, promote positive change in our communities, and support a more inclusive society. We will also maintain a focus on health and safety. By doing so, we can be a better company, partner, and neighbor to all our stakeholders.



2. CIRSA at a glance

CIRSA at a glance

Key outcomes in 2021

At CIRSA, we want to guarantee an enjoyable and personalized leisure experience and do everything to ensure that every person uses our services safely and responsibly. For this reason, we are constantly working to be aligned with the best practices of Responsible Gaming. The main highlights of this report are presented below:



We are also in the process of obtaining the **certification of Global Gambling Guidance Group (G4)** for our Responsible Gaming Policy and Program, which demonstrates once again that Responsible Gaming is one of our top priorities.



Guaranteeing environmental protection in our processes

As part of our environmental and business strategy, **we want our gaming halls to reduce their environmental footprint**. In this regard, we have launched a strategic project called **Green Hall** to ensure that all our gaming halls implement the best environmental practices within four areas of focus: energy efficiency and water use, renewable energy, waste management and new fully environmentally compliant sites and refurbishments. The main highlights of this report are presented below:

-31%

2015-2021 Electricity consumption reduction per sqm 95%

we expect to reach 95% purchased renewable energy by the end of 2030 **-46%**

2015-2021 Reduced Scope 2 carbon footprint t CO_2 e per sqm

We strive to be the best place to work for our people

As our team is an essential part of our business. Not only we need to ensure that **they are the most prepared, we provide them with a working environment that fosters a wide array of beneficial targets.** During 2021, our workforce consisted of **12,634 employees from 55 different nationalities and 117 employees with disabilities.** The importance of such diversity lies in the fact that diversity strengthens our ability to solve problems and enhances our understanding of them from various perspectives, which largely improves the services we provide. The main highlights of this report are presented below:

181 women holding management 99%

we are proud of reaching an internal promotion rate of 99% for the gaming hall shift manager position across the Group **49%**

our global team is formed of 49% women and 51% men, while in Latin America women lead in numbers, representing 57% of our workforce

We empower the local communities

470M€

of gaming activity and corporate taxes

+1M€

donated to non-profit organizations and public entities in 2021

The gaming activity and corporate taxes amounted over 470 million euros. Through the gaming taxes, we have been able to be involved in the vaccine rollout program in Colombia, since all the taxes from this nature were invested in the Ministry of Health.

We are also **firmly committed to the local community** and work to create strong ties with small local businesses and the local stakeholders that are close to our facilities. During 2021, we donated more than one million euros to non-profit organizations and to public entities to help those that are most in need.



Strong corporate and regulatory governance at the heart of our ESG strategy and business

Our strong compliance keeps us at the forefront of our industry, having 0 tolerance towards corruption and any infraction of the laws that govern our activities. We make continuous efforts to guarantee that our company strictly follows our strategy and that we keep track of the goals and objectives set for each year.

4,264

of our employees, who are the most exposed ones to situations that can lead to a breach of our Code of Conduct or compliance policies, are recurrently undergoing anti-corrupt, anti-money laundering and compliance training 0

in 2021, we have also excelled in terms of data privacy, with 0 data breaches, 0% of personally identifiable information and 0% of customer data used for secondary pruposes

1st quartile

we have ranked in the 1st quartile and above baseline on the Blackstone Cybersecurity Annual Flash Assessment formed by more than 100 different companies

To further advance security in all our operations, we have **developed and distributed** to all of our employees, collaborators and other parties involved in our activities an **operating policy of the Ethics Line Channel** to guarantee its use in case of potentially irregular activities or behavior that could lead to a breach of our Code of Conduct.

3. About this report



We are **committed** to making available to all our stakeholders, the widest information on our ESG strategy, activities, results, and commitments, with the aim of creating trust and credibility. Therefore, our communications strategy is based on ensuring the transparency of our activities, and guaranteeing that all those representing us communicate in line with our transparency standards.



In line with this commitment, we are publishing our first **Environmental, Social and Governance (ESG)** Report for 2021 to push forward our commitments to the best Environmental, Social, and Governance standards for our activity in the markets that we operate in.

To elaborate this report, we have gone through an extensive and rigorous process of implementing a system for the definition, measurement, management and reporting of each key performance indicator (KPI) in the nine countries where we operate. The reported data are subject to a three-layer level of control, encompassing the ESG Team data preparation and reporting, the Financial and Control function and the Internal Audit review. Besides, the content of this report is guided by our materiality assessment, which has helped us leverage the most relevant ESG topics to our company and stakeholders.

Our first sustainability report reflects the scope of ESG issues that we must address as local leaders in gaming and sports-betting sectors with over 12,000 employees across three continents. We have a unique sense of responsibility towards our local communities, particularly as our industry is increasingly facing higher requirements in social and environmental standards from the regulators, investors, and society. In this report, we seek to provide a status of how we, at CIRSA, **manage the risks and opportunities related to environmental**, **social and governance issues**, and to present the strategy and initiatives implemented so far or, in some cases, to be implemented, in order to excel in the sector and contribute in a sustainable manner to its development and to our growth.

The underlying structure of the report focuses on the relevant aspects necessary for an understanding of CIRSA's business development, as well as market position, and moves forward to building on the three ESG dimensions by dedicating an exclusive section to each one of them featuring the purpose and strategy as well as performance.

We start out with the backbone of this ESG report, which is Responsible Gaming, followed by environment, and the social aspects of our operations, which are split into two sections: our people and our contribution to society. Last but not least, we cover the compliance and corporate governance of our ESG strategy. The report encompasses initiatives and performance metrics from our global operations covering the period between January 1, 2021 and December 31, 2021.

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4. About us

CASING

CIRSA is an international gaming operator that initiated its business operations in 1978 in Spain

Our business activity

What we do

CIRSA is an international gaming operator that initiated its business operations in 1978 in Spain. Since then, with a leading presence in our markets, we have expanded to Italy, Latin American countries, and Morocco.

We cover the widest range of products and services in the gaming sector from design and manufacturing of slot machines and software to management of slot route operations, casinos and other gaming halls.

Over 12,000 people work for CIRSA in more than 500 premises in nine countries. Our activity is developed in both our own gaming halls and casinos and third-party premises. We have **five main business units**:



Slot Route Operations

Slot machines can be found in third-party bars, cafes, and restaurants.



Gaming Halls

Our gaming urban halls combine and offer based on slot machines and in certain cases, with traditional bingo card games, offering a F&B services to our costumers.



Casinos

Our casinos include both table games and slot machines with a comprehensive set of services, such as restaurant options and a variety of shows.



Online gaming and betting

Our on-line offer comprises sports betting, casino games and social games. It is operated mainly under the Sportium brand. In addition to our on-line offer, we operate an omnichannel business for sports betting in gaming halls and bars which allows our customers to interact with CIRSA through traditional off-line channels, on-line channel or a combination of both.





The B2B business designs, manufactures and sells slots for the Spanish market, as well as software systems for new machines or revamped slot machines. This business is also developing and selling software systems to manage gaming halls and casinos. The whole range of products and services is sold to Group and third-party companies.

Market position

We are a leading multinational company in the gaming and leisure industry in both Spain and Latin America, not only in terms of market share but also as a recognized leading company in terms of creativity, innovation, professionalism, diversity, service, and performance.

Since our incorporation in 1978, we have been offering tailor-made solutions and supplies to markets, members and clients with the best products and services. As opposed to online companies and newer companies from the sector, CIRSA has had a longtime presence in each of its markets, which has resulted in not only a leadership position in terms of market share but also in building up a long-lasting proven commitment with the highest standards of business ethics and compliance with the regulations of each market we are in that is highly recognized by regulators, customers and other stakeholders:



As a group, we strive to maximize our efficiency and productivity while simultaneously developing and consolidating profitable growth through solid investment plans. The current management team took over CIRSA in July 2006. Since then, the team has always delivered consistently all its commitments. In July 2018, Blackstone acquired the majority of CIRSA shares, contributing with strong financial market knowledge and muscle, and fully supporting our strategy:

The robustness of our business is further proven by the very fast recovery of our pre-pandemic profitability levels once COVID related restrictions have been lifted.

We strive to maximize our efficiency and productivity while simultaneously developing and consolidating profitable growth through solid investment plans supported by a sustainable and diverse business strategy.



CIRSA in numbers

At December 31th, 2021, we operate 149 casinos, 80 bingo halls, 248 arcades and have 82,519 slot machines and 634 tables. We received more than 50 million visitors annually and organized close to 6,500 non-gaming events.

CIRSA's offer covers different business activities in nine countries:



ESG Commitment and objectives

Since its foundation back in 1978, our company's actions have been guided by sustainability, as a principlesbased approach to doing our business. In fact, our strategy is aligned with the United Nations Sustainable Development Goals (UN SDGs, also known as the Global Goals), and we are committed to increasing our contribution to them.

To address the issues that are most material to our company, communities, and key stakeholders, we focus on the five areas of action in which we have the greatest impact.



Responsible Gaming

We strive to offer the best leisure options to our customers across the globe in a responsible way and make safe gambling the norm in all the countries where we operate. From generating a culture of prevention that raises awareness of possible gaming disorders to helping customers to stay in control by providing them assistance and guidance and collaborating with relevant research institutions, we are committed to making sure our customers use our services safely and responsibly.

Our local gaming model based in being the gaming

supplier store in a given neighborhood in an urban place, with very limited sqm compared to traditional casinos worldwide. This strategy provides a unique opportunity to develop a safe gaming environment to our customers based on an in-person supervision of gaming activities by our employees and partners. To do so, establishing procedures and training our people is a key element to reach the highest standards in the protection of our customers. This is the reason why our main commitments in Responsible Gaming are based on the certification of our facilities and the training of our people:

Target	Description
Maximizing the % of facilities certified in Responsible Gaming (Slot Route Operations business)	Safety in our points of sales (bars & restaurant) is a key priority in our company. We want to guarantee a secure space for everyone. For this reason, we are committed to reaching 90% of our slot route operations facilities to be certified in Responsible Gaming by the end of 2024.
Reaching 100% of target employees from our differents business units to be trained in Responsible Gaming	We want all our employees to be trained in Responsible Gaming. For this reason, we have established a target to train 100% of our workforce by the end of 2023. This implies that 100% of directly managed facilities are trained in Responsible Gaming.

3 GOOD HEALTH AND WELL BEING



While we contribute towards healthier lives and well-being for our employees and a sustainable consumption of our services through the promotion of Responsible Gaming, we play a role in the achievement of the United Nations Sustainable Development Goals (SDGs) of the 2030 Agenda. More concretely, we are commited to SDG 3 on good health and well-being, which aims at ensuring healthy lives and promote well-being for all at all ages; and SDG 12 on Responsible consumption and production, which aims at ensuring sustainable consumption and production patterns.

Environment

By virtue of the core principles underpinning our environmental and business strategy, a common thread of our premises is their low environmental impact achieved through the integration of an environmentally responsible criterion into their respective design process. Our local gaming model strategy creates gaming spaces which are totally integrated into the urban network of our communities, avoiding the environmental impact caused by traditional large developments worldwide.

However, we are committed to minimizing our environmental impact and supporting climate change mitigation through innovation and efficiency across all our company operations. As part of our strategy we are ramping up our efforts to transform our gaming halls and other premises into truly low impact and highly efficient green halls, which are intended to feature a cutting-edge environmental management system based upon the four strategic levers that we believe will significantly contribute to reducing our environmental impact: energy efficiency and water use, renewable energy, waste management and new fully environmentally compliant sites and refurbishments. Our business strategy encompasses a constant aim to reduce energy and materials consumption that is aligned with our targets in terms of GHG emissions and use of renewable energy.

Despite our commitment to reducing GHG emissions, our performance will be largely influenced by the policymaking evolution in every country.

Target	Description
Medium to long-term voluntary GHG emissions reduction	We aim to reduce 65% of our greenhouse gas emissions by 2030, compared to the level of emissions in 2021 as well as to achieve a 30% decrease in our scope 2 (location-based) GHG emissions.
Percentage of renewable energy consumption	We want to reach 95% renewable energy consumption by 2030.



Our environmental actions to mitigate climate change are directly related with SDG 7 on Affordable and clean energy, which targets universal access to affordable, reliable, sustainable and modern energy and SDG 13 on climate action, which demands urgent action to combat climate change and its impacts. Both of them support the targets we set and our current actions to be more climate and environmentally friendly, as well as resilient.

Team CIRSA

Our people are our most important asset and a key piece in the success of our business. We embed an employee-centered culture based on Excellence, our group's *raison d'être*, by ensuring an adequate work environment where employees can develop the skill sets and mindsets they need to perform at their best. We want to ensure that our workforce knowledge reflects our culture, core values, and organizational goals along with the competencies and overall acumen required to effectively succeed.

When prioritizing our actions to ensure the growth of our people and their well-being, we strive to align everybody at CIRSA towards our core values around Responsible Gaming as well as to take into account the need for equality of opportunities for women in geographies where their access to the labor market in general and to management positions in particular has been highly hindered. In this respect, our main commitments are the following:

Target	Description
Increasing the average training impact per employee	Training our employees is what makes our workforce more prepared and ready to deliver the highest quality and safest services. For this reason, we are committed to increasing our current average training impact of 2.67 per employee by 40% in 2023
Keeping the ratio of internal promotion vs. hiring	We care about our team and we want our team to stay with us. For this reason, we are committed to maintaining our ratio between internal promotion and recruitment above 90% to ensure that sufficient growth opportunities are given to our employees and that our people strongly adhere to our values
Increasing the percentage of women in gaming hall manager positions - Globally	One of the most key positions in our organization is the Gaming Hall Manager. We commit to increasing the % of women holding this position to over 50% by 2030







Our contribution to society

Beyond being a major economic contributor that acts as an incentive to create local jobs and produces tax revenues to fund social programs, we are firmly committed to the local community and work to create strong ties with small local businesses and the local stakeholders that are close to our facilities. In addition, we also get involved by providing in-kind and financial support to social initiatives that are devoted to help the most vulnerable people in the different countries where we operate. Over 99% of CIRSA workforce is based in the local communities where revenues are generated.

99%

Over 99% of the CIRSA workforce is based in the local communities where revenues are generated CIRSA commits to operating only in regulated markets through local companies, thus ensuring a contribution to public resources through payment of corporate and gaming taxes according to the level of activity in each of the countries.

1 ^{NO} ₽overty





Through our contribution to the local communities, we contribute towards SDG 1 on no poverty, which aims at eradicating it at all levels; towards SDG 16 on Peace, justice and strong institutions, which aims at promoting peaceful and inclusive societies for sustainable development and last but not least, towards SDG 17, which targets the strengthening of the means of implementation and revitalization of global partnerships for sustainable development.

Corporate governance and compliance

Our commitment to compliance is one of the factors that allows us to be one of the leading companies in the sector and a benchmark at a business level. We promote honest and ethical behavior, preventing and rejecting any form of corruption without hesitation. Our activity is designed so that each person who is part of the company strictly complies with the current legislation in every place where our activity is located. We want to make sure these commitments are shared by all our business related parties.

Target	Description
Training in compliance matters (anti-corruption, money laundering, etc.)	Our commitment to compliance matters is not only reflected through our performance indicators but through our established goal of training 100% of our targeted employees in compliance matters before the 31st December 2023.

100% of our targeted employees in compliance matters before the 31st December 2023

16 PEACE, JUSTICE AND STRONG INSTITUTIONS



SDGs 16 and 17 on Peace, justice and strong institutions and on partnerships for the goals are also well aligned to our corporate governance and compliance projects and the multiple partnerships that we have established with our local communities.

ESG Governance

Our strategic vision is to integrate ESG into the heart of our decisionmaking process. For this reason, ESG factors are embedded in the bodies that design and execute the group's strategy at board, top management, and operational levels.

Going forward, we are committed to linking part of the variable compensation of our employees to our ESG Commitment. In this regard, we operate a comprehensive management accountability structure which combines bottom-up and top-down approaches to implement our ESG commitments. In fact, the board of directors approves the strategy reflected in the different policies that we have in place, where we clearly state where we stand on key ESG issues. We have defined a structure of four internal champions that are accountable for the performance of our Environmental, Social, Governance, Responsible Gaming and People strategies. These four champions are all C-level executives of our Group, which ensures a high leverage for the implementation of strategies, policies and actions related to ESG management in the nine countries where we operate. In addition, the Responsible Gaming champion is also the overall Head of ESG, reporting directly to the Executive Chairman. The fact that each of the champions also coordinates and manages a corporate function which is deployed in all our locations enables us to guarantee the deployment of the strategy to all our people.

Furthermore, there is a bottom-up approach flowing upwards in which solid reporting systems are implemented to report both internally and externally as well as to measure our performance and detect any deviation from the established pathway. Our board of directors is the ultimate responsible for supervising governance, Responsible Gaming, workforce management, environment, and health & safety issues. Besides, in every Board of Directors, specific information on ESG and cybersecurity is provided to our Board members and related strategies and actions are approved. Our ESG actions are upgraded to the highest of our own standards and those that Blackstone applies to its portfolio companies.

In the decision-making process for capital expenditure (CAPEX), ESG criteria play a central role. Not only ESG CAPEX has a split budget but also those investments that have a positive impact on ESG targets are favored in the decision-making process of assigning priorities to the different CAPEX proposals.

When establishing our ESG commitments, we have previously tracked best-practices across different sectors, had regular contact with external ESG experts and monitored indices and criteria from various rating agencies and ESG ranking providers.

Over 50 of our people are directly involved in ESG management, from setting targets, assigning resources and implementing actions to reporting and supervising their execution.

5. Responsible Gaming

We want to offer the best leisure options to our customers across the globe in a responsible way

Purpose & Strategy

In CIRSA, we want to guarantee an enjoyable and personalized leisure experience and do everything to ensure that every person uses our services safely and responsibly.

We understand that Responsible Gaming entails making assertive and informed decisions for the sole purpose of pursuing entertainment and not by any means should gaming be used to deal with economic and emotional issues.

We are constantly working to make our business safer and aligned with the best practices in terms of Responsible Gaming. We strive to create longterm sustainable relationships with our players by delivering the best customer experience driven by safety and sustainability when it comes to engaging with them.

Gaming can provide an alternative way to enhance emotional well-being since it uplifts people's social environment and positively contributes to their personal engagements. However, even though most adult population enjoys this type of entertainment in a safe and responsible manner as part of their leisure activities, we fully acknowledge that there is a certain minority of users who for different reasons experience some issues. In Spain for example, this figure translated to 0.25% of the population (18-75) in 2021.

Our approach to Responsible Gaming is tailored to offer the best available tools to our local customers who come to our premises whilst providing the best resources to face the challenges posed by a fastgrowing industry as is the case of online gaming.

Likewise, we believe that it is fundamentally important that our Responsible Gaming strategy encompasses both retail and online gaming so this is why we take a two-way approach combining both preventive and proactive phases in order to generate a true Responsible Gaming culture that reaches out to all our customers.



Preventive Actions: measures to encourage Responsible Gaming

We want safer gambling to be the norm in all the countries where CIRSA operates. Through training and awareness campaigns, we want to encourage safer gambling in our culture and provide our people with the proper set of skills.

Furthermore, we want to protect and empower our customers. In online gaming, we heavily invest in artificial intelligence to carefully monitor the customers who engage with us to identify problematic behavior and offer easy-to-use tools that enable them to stay in control.

Finally, we are working to promote awareness among our customers regarding safe and balanced gaming. In all the countries where CIRSA operates, we encourage Responsible Gaming by making information on gambling harm available to all our customers through a strategic Responsible Gaming communication plan. Nowadays, we are in the process of obtaining the certification of **Global Gambling Guidance Group (G4) for our Responsible Gaming Policy and Program.**

Active actions: our support for problem gamers

We promote active collaborations and partnerships with relevant research institutions to provide assistance and guidance for people who have developed problems related to excessive gaming. We also organized the campaign called "Play Responsibly" in Colombia, which seeks to invite customers to play in a controlled manner and as part of recreational leisure activities, playing in the company of family and friends, and in accordance with their economic possibilities.

Overall, these are key commitments that guide us through in our pledge to achieve an entertaining, efficient, safe, fair, and social gaming experience. We actively participate in all sectorial associations of the gaming industry to promote these commitments and work on specific measures that guarantee the highest standards in Responsible Gaming within our sector. Among those, **our company, for example in Spain is part of the Responsible Gaming advisory board**, which is led by the Directorate General for the Regulation of Gambling (DGOJ).

In order to work on each of its commitments, the Group has defined a Responsible Gaming function led by our ESG head, who is in charge of overseeing and monitoring our performance in Responsible Gaming across our business.



We want safer gambling to be the norm in all the countries where CIRSA operates

Actions & Results

Our preventive measures to encourage Responsible Gaming

Training in Responsible Gaming for our employees

Our commitment is to roll out this initiative in Spain by the end of 2022 and extend it to the rest of the countries by the end of 2023. By doing so, we aim to establish a profound Responsible Gaming culture across our company.

Currently, we offer tailor-made training in the field of Responsible Gaming to all new croupiers who join us and to all newly hired employees as well. We are shaping our training approach so that all employees fall within the scope of our brand-new Responsible Gaming training program. Our plan is to customize the training contents based upon the role of the employee within the company. In this regard, all employees will undergo an assessment test irrespective of the role that they perform.

Responsible Gaming certifications in the bars and restaurants industry

The hospitality industry in Spain constitutes a fundamental asset to our business. For this reason, and as part of our promotion of Responsible Gaming culture in this industry, CIRSA and other leading Spanish gaming companies, together with COFAR (Confederación Española de Empresarios del Juego Recreativo en Hostelería), have defined a certification program to make sure that the bars and restaurants industry puts in place preventive and pro-active measures tailored to ensure safer gambling. The correct implementation of the program has been validated by SGS, which is one of the world's leading certification companies. To obtain the certification, the facility will have to undergo an assessment that validates whether it is compliant with the requirements underlying the certification program.

10,170

facilities certified in Responsible Gaming in 2021

Companies recognized by this program show a strong commitment to offering safe gaming products and making sure that gaming is undertaken according to the existing regulatory measures with an underlying sense of social responsibility.



cofar ACREDITACIÓN DE RESPONSABILIDAD SOCIAL

The assessment undergone by the sector will review that facilities comply with the following principles



1.

Offer a **safe and regulated environment** to customers in the hospitality industry

3.

Only give access to **legal age** customers

2.

Guarantee a **stringent supervision by experts** who make sure that gaming takes place in the proper regulatory framework

4.

Protect **vulnerable collectives** from gambling-related issues

5.

Implement responsible measures to **help customers** who might get in trouble with gaming

6.

Provide information so that customers are **fully informed** of what gaming entails

Use of AI to tackle gambling-related issues

It becomes clear that the iGaming world will continue to gain in popularity in the upcoming future as technological developments make it easier to offer a more attractive gaming experience. Therefore, we want to ensure safer and fairer online gaming so that customers can make the most of their time.

To achieve this goal, we have implemented AI technologies aimed at monitoring, screening, and profiling our customers, allowing us to protect them by identifying potential early signs of gamblingrelated issues. The system monitors different parameters such as frequency, time, expenditure, and gaming style. Besides, it provides weekly reports that enable us to identify irregular betting patterns. If we detect that our customers start to show an undesirable gambling pattern, we communicate with them to offer easy-to-use tools that enable them to stay in control.

Raising social awareness

Through awareness campaigns, we must continue to empower our customers to help them make safe and responsible decisions.

In this regard, we are implementing a global communication plan in all our gaming halls that is tailored to the needs of our customers and employees. As part of this communication plan, we display awareness messages regarding Responsible Gaming across all our operations. For example, in our gaming halls, we have signage to advise our customers to only gamble the amount of money they can afford whereas in online gaming, we notify them via SMS or e-mail. risk situations proactively detected through monitoring systems

512



In online gaming, we provide our customers with the information needed to feel safe when engaging with us. Furthermore, we provide information on tools that can be used by parents to avoid minors getting access to online gaming as well as information on self-exclusion from webpages.

We also have a customer telephone service specialized in Responsible Gaming that offers guidance to all customers who need support or feel they want to reach out for help.



Reinforcing self-exclusion

The generation of a Responsible Gaming culture largely relies upon the empowerment of our customers. Aligned with this commitment, we want them to shape their gaming experiences at their convenience. As such, we encourage them to establish betting limits among other initiatives. In 2021, 2,044 gamers have established betting limits. Additionally, we operate a self-exclusion program that allows customers to withdraw from their gaming engagements whenever they feel they need to.

25,584 self-exclusions (online gaming)

2,044 gamers established betting limits in 2021

Our support to problem gamers

Collaborating on therapeutic treatment

A significant share of our Responsible Gaming efforts is devoted to collaborating through different CIRSA professionals with researchers to address gambling-related harm, which becomes of key importance when customers experience difficulties in their engagements with gaming. Furthermore, this type of collaborations helps us create a controlled gambling harm-reduction context.

We acknowledge that pathological gambling greatly improves with psychological treatment. For this reason, we are working to establish a strategic partnership with a relevant institution in the healthcare sector to fund a research study in the area of behavioral addiction so as to better understand, help and empower our customers to gamble in a responsible and safe manner.

In addition, since 2016 we have been working closely with ACENCAS (Catalan Center for Social Addictions) dedicated to helping not only those who suffer from gambling-related harm, but also their closest inner circle.

Subventions to treat gambling addiction

Lastly, we would like to highlight our founding program which, since 2017 and in partnership with CAT Barcelona, helps treating gambling addiction targeted to those people that cannot afford the costs of an intervention and to those that are in a vulnerable situation.



6. Environment

Minimizing our environmental impact and supporting climate change mitigation through innovation and efficiency

Purpose & Strategy

According to the World Health Organization, climate change is one of the main threats to humanity, jeopardizing the progress in development, global health and poverty reduction achieved over the past 50 years.

Even though our company does not have a significant impact on the environment, we acknowledge the important role of the private sector in supporting the mitigation of climate change, as well as the urgency to act against it. In this context, we are committed to reducing our environmental footprint and improving process and energy efficiency in all countries where we operate.

Likewise, we make sure that a responsible environmental criterion is integrated into our internal processes, such as decision-making and risk analysis in internal operations and investment as well. This strategy is laid out in our Environmental Policy, which outlines the company's objectives to ensure that we act in an environmentally friendly manner.

As part of our environmental and business strategy, **we want our gaming halls to truly** reduce their environmental footprint. In this regard, we have launched a strategic project called **Green Hall** to ensure that all our gaming halls implement the best environmental practices with three areas of focus:



Energy efficiency and water use





New fully environmentally compliant sites and refurbishments



All our facilities employ the latest technologies to guarantee a rational use of water and to avoid waste, thus making our consumption more efficient. In terms of energy consumption, we want to ensure that all the facilities implement energy-efficiency projects, especially in saving electricity consumption. Equally important to us is the promotion of the use of renewable energy, with a special focus on the installation of solar panels within our facilities located in sunny geographies as it's the case, in the majority of them. At the same time, we are committed to continuing investing in IoT equipment to digitalize our energy management system and make it more efficient. Finally, we want to develop a Decalogue of sustainability measures to be applied in our facilities, according to their activity, type and location, classified by categories following a LEED, BREEAM or equivalent certification standard. For this reason, we understand that by combining these different measures, we can rapidly

achieve our ambitious GHG reduction targets that have been set out for 2030.

Furthermore, by implementing a solid waste management system in our Gaming Halls, we want to prevent pollution and contribute to reducing our operational environmental footprint. In this regard, we put in place stringent measures to optimize our waste generation with the aim of recycling all unavoidable waste while reducing the amount of waste we produce.

The environmental strategy is managed and supervised by the top management and executed through a robust environmental function operating in Europe and Latin America. The environmental team is led by our environmental champion and facility management director, who works along with all our environmental country managers to deploy all the strategic projects.



Actions & Results

Energy efficiency and water use

According to the World Resources Institute, energy consumption is responsible for more than 70% of global greenhouse gas emissions. In our case, global energy consumption in 2021 amounts to 159,275,763 kWh while energy consumption per gaming hall and sqm is 393 and 488 kWh, respectively. As observed by the data in 2021, energy consumption makes up a significant share of our environmental impact. In this context, every facility has implemented different energy efficiency projects such as carrying out energy audits in all gaming hall segments, installing on/off switches on slot machines, implementing presence detectors or changing conventional lighting to LED.

In the last years, digitalization has played a major role when it comes to energy efficiency. For this reason, we keep on upgrading and designing tailor-made equipment so that we can remotely monitor and manage our energy consumption. In this regard, we are currently operating an IoT project involving more than 121 gaming halls across all the countries. As of 2021 we have deployed.

-31%

2015-2021 electricity consumption reduction per sqm





remote energy management systems remote air quality management systems considering that the number of this kind of proje

Furthermore, we have upgraded our energy efficiency in 8 locations across Spain, Colombia, and Panama via the deployment of Variable Refrigerant Flow HVAC systems, which can simultaneously heat and cool different spaces in a facility, thus allowing greater temperature control while retaining energy at the same time. Additionally, we can claim that LED technology is thoroughly implemented in all our premises.

All these initiatives are expected to allow us to save more than 5 million kWh per year until 2023.

Considering that the number of this kind of projects will improve in the future, the potential savings from these initiatives are expected to grow significantly.

Regarding water consumption, our impact is not considered to be significant. Our global water consumption in 2021 is 510,044 m3. On average, our gaming halls use 1.26 m3 while our consumption per square meter is 1.56 m3. As of 2021, water consumption related data have been calculated based on the total annual expenditure and the average unit cost of water in every country.

Renewable energy

As for the electricity that we purchase in the retail electricity market, we can claim that in 2021 55,723,274 kWh came from renewable energy sources, while the share of electricity purchased from renewable sources in **Panama and Spain amounts to 85% and 70%, respectively.** However, we expect to reach 95% of purchased renewable energy in the abovementioned countries by the end of 2030.

Besides, combined with our efforts to purchase renewable energy, we are increasing our renewable energy consumption by deploying photovoltaic systems in our premises. In this regard, to test this initiative we have installed 350 kWp solar panels at our Winland Casino in Guadalajara (Mexico), which contribute by 24% to the casino's total energy consumption. Moreover, we aim to expand our selfconsumption capacity in the medium-term in all the countries where we operate. Our current commitment is to reach 95% renewable energy consumption by 2030. In fact, we keep on increasing the share of purchased renewable energy to power our gaming halls and corporate facilities. Since 2018, we have achieved a fivefold increase in our global renewable energy consumption.

By purchasing renewable energy, we are significantly reducing our Scope 2 market-based GHG emissions, which demonstrates that our ESG strategy is yielding real results and contributing to a lower carbon environment.



of renewable energy consumption in 2021 across all countries

Our aim is 95% renewable energy consumption by 2030

Carbon emissions

As a result of our energy consumption reduction and the use of renewable energy, we have been able to significantly reduce our **Scope 2 carbon footprint by 46% between 2015 and 2021.** In fact, we recognize the need to focus on our scope 1 GHG emissions reduction. In this regard, the transition **from fossil fuel to electric vehicles** is around the corner and we want to embark on this new challenge very soon.

-46%

2015-2020 reduced Scope 2 carbon footprint t CO₂ eq per sqm



As part of our fundamental commitment to decarbonizing our operations, **we aim to improve our environmental impact by introducing a policy that promotes the use of ecological vehicles in 2023,** and thus, further reduce our Scope 1 GHG emissions, which are largely driven by our vehicle fleet fuel consumption. Furthermore, we want to install charging points to allow our people and customers to charge their vehicle at our premises. By doing so, we will pave the way for reducing our indirect Scope 3 greenhouse gas emissions.

As a company committed to a sustainable, fair, and climate-safe future, we want to bring forward our **commitments to mitigating climate change:**

We commit to reducing our carbon footprint (market-based) by **65**% by 2030 compared to our emissions in 2021, including our emissions per gaming hall and per square meter. We are also committed to reducing our Scope 2 location-based emissions by 30%.

We want to embark on the challenge of **reaching net zero by 2050** as agreed upon in the Paris agreement

Our carbon f	ootprint in 2021:
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Total GHG emissions – direct and indirect $tCO_2 e$ (Market based) ¹	36,230
Total direct GHG emissions (Scope 1) tCO ₂ e	15,076
Total indirect GHG emissions (Scope 2 – market-based) tCO_2e	21,154
Total indirect GHG emissions (Scope 2 - location-based) tCO_2e	31,741
GHG emissions per gaming hall tCO ₂ e	89
GHG emissions per sqm tCO ₂ e	0.11

¹Scope 1 and 2 GHG emissions have been calculated using the GHG Protocol Corporate Accounting and Reporting Standard. As for Scope 1, the following fuels fall within the scope: natural gas, propane, butane, liquefied petroleum gas, gasoline, and diesel. Consumption data has been converted to GHG emissions using 2020 MITECO emissions factors. Scope 1 considers a well cooling gases consumption which has been estimated by extrapolating Q1 data for cooling gases in 2022.

²Scope 2 location-based GHG emissions have been calculated based on the national emissions factors. Market-based GHG emissions have been calculated based on the emissions factors of the retail electricity suppliers.


Waste management

We want to be strictly compliant with current environmental legislation across all the countries in which we operate by adopting measures for continuous improvement and setting regular targets to be verified through audits. Data from 2021 shows that we have generated **529.6 metric tons of waste,** of which 385.7 metric tons come from our B2B manufacturing business processes and 143.9 metric tons from the pure gaming activity. Our industrial and retail activities by their nature do not generate any meaningful amount of hazardous waste. A system for the exact measurement of this type of waste will be implemented; however, it is estimated that hazardous waste generated is below 20 metric tons per year across all our countries.

91%+ of our corporate and manufacturing waste is recycled.

To reduce waste generation and promote recycling whenever possible, we have implemented an effective waste management system tailored for both manufacturing and pure gaming activities. As an example, we include an identification stamp on CIRSA slot machines to enable their subsequent recycling once they reach the end of their service life. This stamp includes information on all the components used (printed circuits, screens, plastics, electrical wiring, glass, etc.) to ensure proper disassembly and separation.

In addition, we make sure that customers and our people recycle in our buildings, make a proper use of water, and that all items that cannot be used anymore are accurately managed.

7. Team CIRSA

We strive to be the best place to work for our people

Purpose & Strategy

We remain committed to our network of stakeholders in offering tailor-made solutions and supplying markets with the best products and services. This commitment is shared by everyone that is part of CIRSA.

Bearing this in mind, it is critical to manage the risk of increased turnover and the resulting costs of rehiring and loss of intellectual and human capital. As our team is an essential part of our business, we need to ensure not only that **they are the most prepared**, **but also that we provide a working environment that fosters a wide array of targets that are beneficial to our people**.

In this sense, at CIRSA we actively work to cover from the most basic to the most advanced needs of our employees.

Attracting, developing, and retaining talent



Our team in numbers

Our team consisted of **12,634 employees** in 2021. Although we are a big team, and as a result of our overall business strategy we still remain acting a local business, which explains why most of our employees come from local communities. More specifically, 90% of our management teams are locals.

Employees by professional category

Management	771
Administration and other support staff	1,904
Gaming staff	9,959
Total	12,634

Employees by age

Under 30 years old	2,806
Between 30-50 years old	7,595
Over 50 years old	2,233
Total	12,634





Actions & Results

Our strategy to be the best place to work for our people increases the value of our services, our company, and the impacts on society. We do so by providing the best and most adapted training programs according to the job position of our people, by ensuring our employees' well-being and access to equal opportunities (diversity and inclusion), the best conditions of health and safety and competitive compensation and benefits packages.

Ethics & Equal opportunities

Ethical standards in our processes

We are fully committed to ensuring diversity and inclusion in all of our people management processes , from hiring to dismissal. We have a zero- tolerance policy towards any type of discrimination. All employees involved in people management and, particularly those in the different HR functions of our Group receive very clear communication regarding this policy.

Diversity and inclusion

In terms of gender inclusion, globally in 2021, a total of **181 women held a management position in** gaming halls, which accounts for **38% of managers**.



Furthermore, our team **globally** consists of **49% women and 51% men**, while in **Latin America women** lead in numbers, accounting for **57%** of our workforce. We are proud to put forward these numbers, since it positions us above the industry average (46% women vs 54% men). However, we acknowledge there is still room for improvement.

For this reason, we are currently working on a total of **24 Equality Plans** at the national level. Our main commitments and action plan include guidelines to strengthen diversity and inclusion in our teams by increasing the number of nationalities and targeting gender parity in our positions, **communicating** Equality Plans internally; **guiding** gender integration across the company and **defining a glossary of equality terms.**

Furthermore, we aim to make our team as diverse as possible, with people from **55 different nationalities**, and 117 employees with disabilities in 2021. The importance of such diversity lies in the fact that diversity strengthens our ability to solve problems and enhances our understanding of them from various perspectives, which largely improves the services we provide.

Social dialogue & Security of employment

Trade-union freedom and freedom of association

We **guarantee trade-union freedom and freedom of association** for all our employees and recognize their right to collective bargaining and strike action. CIRSA therefore pays special attention to adopting and promoting applicable laws and agreements with union representatives. Similarly, in line with the local legislation of the regions we operate in, we do not participate in any type of action that restricts the rights of employees to join a union. More information can be found in Section 9 on Corporate governance. All these actions are guided by our Code of Conduct and Code of Ethics, which are delivered to each of the employees that are part of our team.

Quality employment

We always prioritize long-term employment contracts, which results in quality employment for all the local communities where we operate. Security of employment is also essential to attract the best talent and to deliver the best service to our customer base.

Safety and health & Working conditions

Safety and health at work

As our Occupational Risk Prevention Policy states, **we remain highly committed to health and safety at work,** a key priority for our Human Resources team.

Some of the results from our efforts to keep health and safety at work can be seen by the very low number of accidents that occur at CIRSA. In 2021 there were **187** work related and commuting road accidents and 0 occupational diseases.

We also **promote a workplace that is free from harassment or intimidation,** where offensive and inappropriate behaviors are not permitted – whether sexual or of any other kind – including explicitly sexual proposals or suggestions, as well as taunts or offensive conversations that may offend people's dignity. **82%**

of our employees is covered by collective agreements



92% of permanent contracts



0.008

accidents per 1,000 hours worked





Measures against COVID-19

During 2021 we have been working towards the full protection of our employees and clients when it comes to COVID-19, going beyond the requirements established by the different local regulations. We created a COVID-19 specialized team to coordinate our actions globally and protect our customers and our team. The total investment made to achieve such a great level of protection exceeded 6 million euros in 2021.

We guided our employees worldwide on what to do when detecting a suspicious case, providing specific instructions and training, as well as different rules that they had to follow to guarantee their protection. We also developed and posted signs in our establishments informing customers about preventive measures against COVID-19. We were also constantly checking ventilation, climatization and purification of our spaces and met periodically with the Health and Safety Committee to follow up the status of the situation and actions to be taken. Different rules for external parties and employees were also developed and implemented.

Working conditions: Employee compensation

We are not only aware of the importance of our people's development, but we are also committed to providing a competitive reward package for each employee across all levels. In this regard, we offer a wide range of benefits to our employees, including **benefits**, where we offer our employees the possibility of using **discounts** in a wide range For the specific case of Spain, we received a responsible management of COVID-19 certification to guarantee not only that the health and safety conditions against the spread of COVID-19 were in place, but also to make sure that we were complying with national laws against the spread of the epidemic, as well as to certify the safety of our facilities (gaming and non-gaming).



of products and services; **scholarships** to push forward the development of our team; different **loans and payroll advances and health insurance** options.

CIRSA ö

Professional development

Internal promotion

One of the most important positions in the management of any retail gaming business is the gaming hall shift manager. Covering this position with employees that are very familiar with the group's culture, values and procedures is a key success factor for any gaming hall. We are proud of reaching an internal promotion rate of 99% for this position across the Group. Both training programs and procedures for detecting the best internal talent have been key elements to achieve this figure.

Our yearly employee global turnover rate of 25.95% is highly related to different local labor market situations across the countries we are in. Whereas in Europe our turnover rate is below 12%, in other countries the rate is significantly higher, as it is for the general labor market. We are committed to reducing CIRSA's turnover rate and at the same time we are proud to increase our people's employability through training courses, learning of foreign languages and, more importantly, fostering ethical and professional values across the organization that clearly exceed the standards of the markets where we operate.

Committed to keep a ratio between Source for the set of hiring in our operations above 90%

Training and development

Our staff's know-how and professionalism, which results from the continuous training at CIRSA casino training schools and other training programs, mean that the service you receive is always in line with our own unique personality and way of working . We promote learning to help our people develop in their positions and offer them promotion opportunities aligned with their careers. In such way, we achieve excellence in our products and services. In addition, it is our a priority to be aware of every team member's skills and potential growth, so we can allocate the necessary resources to their training and development.

Some examples include training in Digital Transformation; Management Development; Continuous Improvement and Compliance. In this regard, through the International Fellowship Program of CIRSA Corporate University (UCC), employees can benefit from grants for studies that complement their professional knowledge. In the past 10 years, more than 800 people have benefited from the fellowship program.

Other training and development programs, such as "Enjoy learning with us", focus on the professional and technical development of our employees, including: the Masia Plan, aimed at detecting and boosting internal talent; the Growth Program, which targets employees with great potential for growth; or the One Bridge for All, to encourage creativity and communication in the team.

We offer very specific training courses conducted by experts in the field, around three different functions: business, soft skills and hard skills related to technological development in our sector. We bring in personalized solutions that allow us to adapt to the learning needs of each participant.

Training hours by professional category during 2021

Management	2,448
Administration and other support staff	13,653
Gaming staff	252,766
Total	268,867

We also **guarantee gender inclusion** when offering our training programs. In this regard, 49% of participants in management development programs were women. Management development programs are international programs that identify and train employees with the greatest talent and potential, with the aim of filling vacancies internally following the career paths defined for each function. In addition, 62% of participants in skills development programs were women. Skills development programs are designed as the entry gate to the management development programs. This high % of women among participants of both training programs ensures a pipeline of women ready to promote which will help our target of reaching parity in gaming hall managing positions.

In 2021, our average training impact was 2.67, which means that each employee took almost 3 courses during year. Going forward, we are committed to increasing this number by 40% in 2023.

Employee well-being

Since people are the driving force behind CIRSA, we do not only focus our HR activities on **attracting, developing, and retaining talent,** but also on ensuring their well-being. We work hard to guarantee the fair and equal treatment of each team member and promote respect by defending equal opportunities regardless of gender and nationality. One of our success factors to attract the best workforce, includes our working conditions, which contribute to achieving **work-life balance** and provide greater flexibility so that our employees can take care of their children and other dependent relatives. To achieve this, we ensure that their needs are fulfilled during the year and that their holidays are compatible with their children's. We also offer the possibility of reducing working time for childcare by 50%. We are also **committed to increasing work from home** in those positions where this modality is possible. In this way, we adapt better to the needs of our employees. Under our motto **"Enjoy life with us"** we develop a series of actions to promote **mental, physical and social health** among our employees. Some of the most representative actions regarding mental and physical wellness include:



we have some initiatives, such as "Saborea el desayuno (enjoy your breakfast)", "Cocina de tupper (lunch box meal)", "Compra saludable (buy healthy)", that aim at improving knowledge and raising awareness among our employees when it comes to healthy eating habits.

Emotional wellness

We promote activities such as mindfulness and laughter therapy.







8. Our contribution to the society

We want to make a positive contribution to society and support the local communities where CIRSA operates

Purpose & Strategy

Besides creating local jobs and guaranteeing tax revenues that contribute to funding socio-economic development programs in the countries where we operate, we are **firmly committed to the local community** and work to create strong ties with small local businesses and the local stakeholders that are close to our facilities. In addition, we also get involved by providing in-kind and financial support to social initiatives that are devoted to help the most vulnerable in the different countries where we operate.



Actions & Results

Economic contribution

With more than 12,000 employees in 9 countries, our economic footprint is significant. An important contribution that we make to the development of the countries where we operate are the so-called **gaming taxes** and **corporate taxes**. Only in 2021, the **gaming activity and corporate taxes amounted to over 470 million euros**.

Through the gaming taxes, we have been able to be involved in the vaccine rollout program in Colombia, since all the taxes of this nature were invested in the Ministry of Health. Our industry is an important economic contributor to local economies. It does not only contribute with taxes, but it also generates employment, as well as provides entertainment to many people. As an example, the gambling industry in Spain paid around 820 million of euros in game taxes to both the central government (181.2) and the regional governments (638.7) in 2021. The economic contribution of the industry is estimated to be 0.8% of the GDP, while the industry creates around 85,000 direct jobs and 175,000 indirect jobs.

Community contribution

At CIRSA, we care about local communities. In 2021, we donated more than one million euros to non-profit organizations and to public entities to help those that are most in need. Some of the key initiatives we have been involved in in the past few years are found below by country.

Mexico

In 2021, we organized an event together with a local foundation to raise funds for breast cancer. In addition, through a project call "Juguetón" and, in partnership with our clients and employees, we donated toys to those children most in need. Another example is the adaptation of three of our gaming halls in Vallarta into shelters to help the people affected by Hurricane Nora, which stroke southern Mexico in 2021.

Costa Rica

Because we care about our employees, we helped those who had their temporary contracts suspended in Costa Rica due to COVID-19 through donations. In addition, we collaborated with MUSADE foundation to give support to women in conditions of vulnerability, discrimination, and aggression by donating groceries that were collected in the casinos, involving our clients as a part of the aid campaign. We also partnered with Alajuela Baptist Bible Church donating chairs and other equipment to support the Alajuela community.

Colombia

With the aim of ensuring access to education, food, and housing for abandoned and disabled children, we partnered with the American Ladies association by organizing a bingo where funds were raised and donated to this cause.

Panama

In order to help children suffering from cancer in Panama, we partnered with Fanlyc through a 24hour walk. This initiative provides a powerful way to unite all collaborators and families by creating an environment that encourages healthy living through physical exercise.

Other initiatives in Panama were targeted to the fight against COVID-19 and the protection of those that were most impacted by it. In this regard, we want to highlight our partnership with the Red Cross and with the MEDCOM TV channel, Club Activo 2030 and Dama Albrook to collect funds and food for those affected by COVID-19. In total, we have donated more than one million dollars in the past two years.

Dominican Republic

In the Dominican Republic we financially contributed to "La Casa Rosada", a non-profit, non-governmental organization (NGO) which operates as a shelter, school and hospital for children with HIV. We also supported "Fundación La Merced", a non-profit association that aims to prevent and eradicate child labor and domestic and commercial sexual exploitation of children by providing them training and support through a tailored program.

Peru

In Peru, we supported multiple entities, including the public administration, through in-kind and in-cash donations. Some examples include donations to the local administration that collaborates with the United Nations International Children's Emergency Fund (UNICEF); donation of toys, food, and clothes to native communities; economic donations to "Teleton" for the physical therapy of kids with disabilities and other inkind donations to EMAUS, in the form of uniforms and other articles for abandoned kids, among others.

Spain

In Spain, where our headquarters are located, we have implemented a vast local donation program through our casinos. Our commitment to the local community is configured in partnership with multiple entities such as the Harena Foundation, dedicated to the care of elderly people who live alone and who, on many occasions, are at risk of social exclusion; or Asindown, a non-profit organization committed to support and advocate for the Down syndrome community.

Likewise, we have a strong commitment to enhancing the quality of life of sick children and in this regard, we financially contributed to the PayaSOSpital Association (hospital clowning) and the Ronald McDonald Children's Foundation. We have also supported childhood cancer research by collaborating with the SEHOP Foundation, a non-profit medical-scientific association.

During 2021 we set up the Sportium Foundation, with the aim of promoting the integration of people and groups at risk of social exclusion through sports, supporting the development of sports through different activities and encouraging the practice of all kinds of sports, ensuring their integration and transmitting sport values. In addition, the foundation seeks to promote equal opportunities between people and groups, through values such as fair play, effort, sacrifice, discipline or self-improvement.

9. Corporate governance& compliance

Our compliance is one of the factors that allows us to be one of the leading companies in the markets we are in and a benchmark at the business level

Purpose & Strategy

At the heart of our ESG strategy and our business, there is strong corporate and regulatory governance. This is achieved through a robust supervision process of efficient oversight and control of our operations that uses the knowledge and experience of the Board members, the senior members of the management team and the Internal Audit team, which is our specialized team in compliance matters. Our strong compliance keeps us at the forefront of our industry, having zero- tolerance towards corruption and any infraction of the laws that govern our activities. We have the best mechanisms in place to adopt the best practices, principles, and recommendations relating to high corporate governance and compliance standards. In fact, **ethics, integrity, respect for the law, transparency and honesty** are principles that we defend, thus rejecting any possible irregular action.

Our activity is further designed so that each person who is part of the company strictly complies with the current legislation in force in every country and region where we carry out our activity. The mechanisms we have in place include¹ :

1.

Our **due diligence process**, which involves three levels of compliance control in every **business unit**, in the **compliance body** and in the **Internal Audit department**.

2.

Our **Code of Conduct**, which establishes the principles and basic rules that everyone in the company must follow.

3.

Our **Ethics Line Channel**, which reports on compliance matters affecting the company.

4.

Our **Anti-Corruption policy**, which establishes a code of conduct for all employees and directors of each and every CIRSA Group company with respect to the prevention, detection, investigation and solution of any corrupt practice within its organization.

5.

Our **Crime Prevention Model**, which prevents and detects any possible criminal offences.

6.

Our effective **training on compliance procedures**, which ascertains that our workers are prepared to act in case they are confronted with actions that go against our Code of Conduct or compliance policies.

7.

Our **cybersecurity measures**, which ensure that data from our clients and operations are protected.

8.

Our **homologation processes for our suppliers**, which guarantee that not only our operations comply with our ethical values, but also our supply chain.

All these mechanisms are reviewed by the Board, which makes sure that we keep track of the goals and objectives set for each year in terms of compliance and other matters.

Likewise, and as stated in the Group's Code of Conduct, strict compliance with our own commitments and obligations with respect to relationships with customers, suppliers, partners, and the environment is guaranteed. This is the basis for avoiding any possible illicit act that would have a strong impact on the reputation and the business itself.

¹ More details are given in the section Action & Results below.

CIRSA 🤴

Compliance structure



Board activities

To achieve strong corporate and regulatory governance, we make continuous efforts to guarantee that our company strictly follows our strategy and that we keep track of the goals and objectives set for each year. For this reason, at CIRSA, we have held **7 board meetings during 2021,** which is **above the minimum required board meetings a year** (4 board meetings a year).

Furthermore, the Group's Executive Chairman has been holding this position for 15 years now. In April 2022, through an internal promotion, Grupo CIRSA appointed Antonio Hostench, until then Chief Strategy and Development Officer, as the new Chief Executive Officer after the Group's Board decided to accept the proposal of the Chairman and CEO, Joaquim Agut, to split the duties of the Executive Chairman and the CEO. As Executive Chairman, Joaquim Agut will continue to lead and implement the Group's strategy, management supervision and the different corporate functions, while being the highest advocate of ESG strategy, initiatives and activities.

Antonio Hostench, the new CEO, will focus his responsibility on the management of the different business units (Casinos, Bingos, Arcades, On-line Gaming & Betting, Slot Machines and B2B) and corporate functions, while maintaining the presidency of Sportium.

Actions & Results

Our corporate governance model provides other companies and even other sectors with best practices, as it has proven to be effective in the correct development of our activities. The main aspects of our corporate governance are explained in detail below.

Due diligence

We **ensure regulatory compliance** through the application of **regulatory due diligence**, which allows us to guarantee that all relevant requirements are met in the countries we operate in. To fulfil this objective, we have a structured organization based on **three levels of compliance control:**

- 1. The first level corresponds to **every business unit** in the daily management of its operations, which closely monitors the legality of the actions to be implemented based on the management team's expertise.
- 2. The second level corresponds to the **compliance function**, which provides information on policies and internal regulation and shapes the compliance model.
- **3.** The **Internal Audit team**, which carries out independent reviews of this model to verify compliance with and the effectiveness of the corporate policies and regulations we have established.

Code of Conduct and Ethics Line Channel

Our Code of Conduct establishes the guidelines for professional and personal behavior that affect all employees and professionals linked to the group within the framework of their professional performance.

Our Code of Conduct takes into account the international agreements on human rights, prevention of money laundering and financing of terrorism, anti-corruption and sustainability. More specifically, CIRSA assumes and endorses the 10 principles of the United Nations Global Compact.

Our Code of Conduct is available for download here.

Through our Ethics Line Channel, all our employees and collaborators, members of corporate bodies, customers, suppliers, partners, consultants, shareholders and, in general, any person who provides services for the Group on the basis of a contract, in addition to stakeholders of the Group itself, can report or communicate, in a confidential manner, any potentially irregular activities and behavior that could lead to a breach of our Code of Conduct. Within the framework of the culture of compliance that prevails throughout the Group and within the continuous improvement plans that are being implemented on Compliance policies, we have introduced a new platform that hosts our **Ethics Line Channel**.

confirmed bribery/corruption cases and investigations.

ethics Line Channel available 24/7 and accessible in English, Italian, French and Spanish

24/7

This channel allows us to keep complying with the requirements from current and new European directives (such as the Directive (EU) 2018/843 on money laundering, the Directive (EU) 2016/680 on data protection and the Directive (EU) 2019/1937 on whistleblowing protection) and to reinforce the Group's high degree of regulatory compliance. Additionally, it helps us to maintain a firm commitment to society, since the platform allows us to communicate anonymously -if desired- any possible irregularity of potential importance that may occur within our company or on its behalf.

We have **developed and distributed** to all of our employees, collaborators and all other parties involved in our activities, **an operating policy** of the Ethics Line Channel to guarantee its use in case of potentially irregular activities and behavior that could lead to a breach of our Code of Conduct. This Ethics Line Channel is managed by the Compliance function, available 24/7 and accessible in English, Italian, French and Spanish. In the aforementioned operating policy, we explain how to use our Ethics Line Channel in greater detail and how the data is processed **to guarantee the safety and effectiveness of the whistleblowing action.**

Anti-Corruption Policy

In line with our strategy, our **Anti-Corruption Policy emphasizes the express prohibition of all forms of bribery,** understood as any tangible or intangible item of value that is offered, promised, paid, authorized, or handed over to a third party in order to unlawfully influence a business decision or obtain an undue advantage in the activity of the Group's companies. Bribes may be in the form of payments, gifts, trips, entertainment, job offers, contacts and debt forgiveness and/or donations, among others.

If employees have any questions or witness any instances of corruption and/or bribery, they must inform the company by notifying their superior and sending an email to <u>lineaetica@cirsa.com</u>, an account managed by the Compliance Officer.

Our code of conduct establishes the following principles with the primary goal of preventing corruption at all levels:

1. Promoting integrity

We promote a culture of integrity within our Group, as well as with our suppliers and collaborators. By offering training, and promoting ethical conduct, we can prevent unlawful conduct that goes against our Code of Conduct from occurring.

2. Business courtesies

Gifts, courtesies, invitations to functions and events, among others, will be based on our internal policy and will not in any case influence the will or objectivity of persons outside our Group to obtain any benefit or inappropriate commercial advantage from them.

3. Conflicts of interest

We respect the participation of our employees in activities outside the Group, if these activities take place within the applicable legal framework and do not enter in competition or conflict with their duties as our employees, nor are they used to carry out corrupt practices.

4. Payment procedure

We expressly prohibit facilitation payments, understood as unofficial and improper payments to public officials to obtain licenses, certificates and other services to which it has legitimate right of ordinary procedures to expedite the performance of an action in its favor.

5. Fair competition

We fully, fairly, and honestly commit to competing markets, hence promoting free competition, leading to benefits for our consumers, users, and society at large.

6. Contribution to NGOs

When we collaborate with non-profit organizations, we do it by ensuring a clear mutual benefit and never as means of concealing acts of corruption or bribery.

7. Relationships with third parties and intermediaries

Our employees and administrators maintain relationships with clients, partners and/or providers based on an ethos of utmost professionalism. We demand ethical principles in our contractual agreements, including anti-corruption standards.

8. Processing confidential information

We process information from our clients, commercial partners, shareholders, investors and employees with maximum discretion and privacy, strictly following our Privacy Policy, publicly available at our corporate website. This information must remain in the strictest confidence.

9. Money laundering

We collaborate with the competent authorities from each of the countries we operate in the fight against money laundering and the financing of terrorist activities, providing all the requested information in accordance with the relevant legal standards and regulations in force.

10. Record of transactions

We have introduced and maintained a suitable internal control system for preparing financial information, guaranteeing the regular monitoring of its effectiveness.

11. Transparency guarantee

We have a duty to offer truthful and complete information that properly provides a fair view of the organization's economic, financial and asset position.

12. Corruption between individuals

We are against and sanction any act through which any of our members or collaborators promise, offer, or grant an illegitimate benefit or advantage of any nature to favor him or herself, a third part or company at the expense of others.

13. Bribery

We condemn any act through which an individual offers or grants remuneration of any kind to an authority, public official, or person working in the public service where the latter performs an act against the inherent duties of his or her position or an act related to his or her position.

14. Dissemination

We communicate and disseminate our Anti-Corruption Policy to all our employees and any other relevant third parties and they must formally commit to comply with the Code of Conduct and the policies and regulations of the organization We also hold training sessions on compliance.

Crime Prevention Model

Furthermore, we have a **Crime Prevention Model** (CPM) in place, developed in accordance with the best national and international internal control practices, with the contributions of employees and third parties.

The above-mentioned CPM has been analyzed by external auditors, who have confirmed that the

operational effectiveness of the controls associated with the CPM is appropriate. For this reason, we have all the control measures to **prevent and detect possible criminal offences** that could be committed in each of the business units and corporate departments, according to the activity being carried out.

Training for compliance procedures

Aside from the supporting documents and channels that available to our employees, we also offer mandatory virtual and on-site training courses to better prepare our employees when possibly facing actions that are against our Code of Conduct or compliance policies. More specifically, we have achieved **135,000 training impacts on cybersecurity,** including those related to awareness-raising, phishing simulations, learning pills and informative brochures. These impacts are expected to further increase, through faceto-face training, videos on demand and special training conducted during our cybersecurity month.

In 2021, we have only registered **2 reportable** cybersecurity-related incidents that were quickly solved. Furthermore, 4,264 of our employees, who are the most exposed ones to situations that can lead to a breach of our Code of Conduct or compliance policies, are undergoing anti-corrupt, anti-money laundering and compliance training. Our aim is to provide compliance training to 100% of our targeted employees by December 31, 2023.

Cybersecurity and data privacy

CIRSA has ranked in the 1st quartile and above baseline on the Blackstone Cybersecurity Annual Flash Assessment formed by more than 100 different companies. This acknowledges our efforts towards making cybersecurity & data privacy one of our highest priorities. Indeed, we take the protection of our customers and company's information very seriously.

Our cybersecurity program has been in place for the past 12 years and is being reviewed and assessed by a Blackstone Cybersecurity team. Currently, it has a dedicated team of 7 people including a Chief Information Security Officer (CISO). The program has **three main objectives: avoid fraud, avoid data leakage and ensure business continuity and recovery.** In this regard, the cybersecurity measures we have implemented cover several fundamental aspects to guarantee the strictest control.

In terms of our network, we highlight the implementation of last-generation firewalls and Intrusion Detection System (IDS), which are

connected with the most critical sectors for the company. User management is another key point for CIRSA's security and a very strict task conducted by the company, so that the permissions granted are in accordance with the needs of the work performed. Any exception must be approved and documented.

Leading solutions have also been implemented in other security fields, such as the EDR solution, leader in most published quadrants, or monitoring systems that allow anomalous behavior to be detected, enabling a rapid response to prevent unwanted spread. All this is operated by a highly qualified team undergoing constant training to adapt their knowledge to the changing reality we are facing.

Moreover, the organization performs constant audits of its servers and applications, including new additions to the ecosystem. In 2021, almost 1,000 audits were performed. Critical projects are also audited by third-party companies, and the results have been satisfactory, confirming the good work done by the organization.

When it comes to data privacy, CIRSA complies with the current laws related to data protection, privacy and personal data security.

More specifically, we guarantee the application of the Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 as well as the national regulations from every country we operate in. To guarantee data protection in each of our markets, we adopt technical and operational measures to avoid the loss, misuse, alteration, unauthorized access and data leakage of our clients' personal data taking into account the technology used, and the nature and risk exposure of data.

We make sure that every new product and service offered complies with the strictest privacy standards, which denotes a clear will to guarantee personal data protection. With this aim, we have a firm commitment to keeping on working in full compliance with the regulation and, among the measures adopted, we nominated a Data Protection Delegate Committee, which is in charge of making sure that the Regulation (EU) 2016/679 is implemented and strictly followed across the group. Furthermore, we implemented new internal processes that were executed in all our facilities with the aim of guaranteeing that the data of our customers, employees and collaborators are protected.

In 2021, we have excelled in terms of data privacy, with:





Responsible supply chain

In 2021 we have worked with **4,916 suppliers**, with a total **contract value of 243.1 million euros**. We do not only guarantee that our team strictly follows our Code of Conduct and Code of Ethics, but we also make sure that they are acknowledged and respected along our supply chain worldwide. To do so, we have defined and established a homologation process that includes a series of questions in terms of compliance and code of ethics that our potential suppliers need to comply. If a potential supplier does not have any Code of Conduct or Code of Ethics in place, we make sure they adhere to ours.

At CIRSA, we promote the **respect for human rights in all our business relationships,** as well as with our employees, clients, suppliers, and collaborators. For this reason, we only collaborate with suppliers that share our values in the defense of human rights. More specifically, we are aligned with:

- The Universal Declaration of Human Rights
- The Declaration of the Labor Organization on fundamental principles and rights at work
- The United Nations Guiding Principles on Business and Human Rights
- The OECD Guidelines for Multinational Enterprises
- The Ten Principles of the United Nations Global Compact
- The European Convention on Human Rights

In this regard, we completely reject forced and child labor and we protect the general interest of society, as well as the rights of the minors. Thus, we take the necessary measures to avoid the acquisition of any service or product that involves this kind of labor in any of our markets and countries we operate in by establishing internal auditing mechanisms when getting to know our potential suppliers and collaborators.



ANNEX **Key performance indicators 2021**

	Global water consumption (m3)	510,044
Consumptions	Average water consumption (m3) per gaming hall	1.26
	Average water consumption (m3) per sqm	1.56
	Global energy consumption (kWh)	159,275,763
	Average energy consumption (kWh) per gaming hall	393
	Average energy consumption (kWh) per sqm	488
	Percentage of renewable energy consumption	44%
Emissions	GHG emissions (Scope 1) tCO ₂ e	15,076
	GHG emissions (Scope 2 market-based) tCO_2e	21,154
	GHG emissions (Scope 2 location-based) tCO_2e	31,741
	GHG emissions (Scope 2 market-based) per sqm tCO $_{\rm 2}$ e	0.11
Waste	Hazardous waste (Tonnes)	<20
	Manufacturing waste (Tonnes)	385.7
	Corporate and manufacturing recycled waste	91%

Environmental KPIs

	Total number of employees Turnover rate	12,634 25.95%		Number of employees by professional category, age and country	See Table 2, 3 and 4 below
being	Training hours by professional category	See Table 1 below		Number of women holding a management position in	181
Employee Well-being	Percentage of women in management development programs	49%	e	gaming halls Percentage of women	
Employ	Accidents per 1,000 hours	0.008	nclusio	holding a management position in gaming halls	38%
	Number of occupational		y & I	Internal promotion rate	99%
	diseases	0	ersit	Number of nationalities	55
	Number of facilities certified in Responsible	10,170	Equality, Diversity & Inclusion	Percentage of female employees	49%
D	Gaming	10,170	Equ	Percentage of female	
e Gamin	Number of self-exclusions (online gaming)	25,584		employees in Latin America	57%
Responsible Gaming	Number of established betting limits (online	2,044		Number of employees with disabilities	117
Resp	gaming)				
	Number of risk situations proactively detected through	512	liers	Number of suppliers	4,916
	monitoring systems		Suppliers	Total suppliers' contract value (€M)	243.1
Society	Total taxes on gaming activity and corporate taxes (M€)	> 470			

Social KPIs

Table 1

Training hours by professional category

Management2,448Adm. & other
support staff13,653Gaming
staff252,766268,8-5

Table 2

Spain

Colombia

Mexico

Panama

Dominican

Costa Rica

Morocco

Republic Peru

Italy

Total number of employees by country

4,621

2,549

1,772

1,254

803

792 482

322

39

12,634

Table 3 Total number of employees by age

Table 4

Total number of employees by professional category



Governance KPIs

Board	Number of board meetings	7
of Directors	Executive chairman tenure (years)	15
Governance training	Number of employees undergoing and completing anti- corrupt, anti-money laundering and compliance trainings	4,264
Cybersecurity	Number of data breaches	0
	Percentage of personally identifiable information	0%
	Percentage of customers' data used for secondary purposes	0%
	Number of training impacts in the field of cybersecurity	135,000
Compliance	Number of confirmed bribery/corruption cases and investigations	0
	Number of reported cases of human rights violations	0



CORPORATE HEADQUARTERS

Ctra. de Castellar, 298 08226 Terrassa. Barcelona Tel. + 34 93 739 67 00 info@cirsa.com www.cirsa.com

MAIN GROUP OFFICES ACROSS THE WORLD

COLOMBIA

Calle 90 No.19c-32 Edificio Blue Tower of.401 Bogotá Tel. +571 6059444 info@co.cirsa.com

COSTA RICA

Oficentro Ejecutivo la Sabana Torre 6, Piso 3 (Sabana Norte) San José Tel. +506 24309980 info@cr.cirsa.com

ITALY

Via Ludovico il Moro 6C Palazzo Ferraris, 3º piano Milano 3 City 20079 Basiglio. Milano Tel. +39 028227951 info@it.cirsa.com

MOROCCO

Secteur Balnéaire et Touristique Bp 194 80.000 Agadir Tel. +212 528848777

MEXICO

Guillermo González Camarena 600, piso 8 Colonia Santa Fe 01210 México DF Tel. +5255 59500030 info@mx.cirsa.com

PANAMA

Calle 50 Edificio PH Global, Piso 40 Ciudad de Panamá Tel. +507 2708700 info@pa.cirsa.com

PERU

Avda. Ricardo Palma, 341, 2° Miraflores. Lima Tel. +51 016107600 info@pe.cirsa.com

DOMINICAN REPUBLIC

Abraham Lincoln Av. Independencia Santo Domingo Tel. +1809 5359292 info@do.cirsa.com