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#### 1. INTRODUCTION

CIRSA is a strong set of companies focused on the gaming sector, an activity which is a source of distraction, fun and entertainment. It can also fulfil an important educational role and bring positive effects to society, as various studies have demonstrated, such as "Recreational Policies: culture, tourism, sports and recreation", produced by the University of Deusto, or "Ludoliteracy", from the Open University of Catalonia.

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

The professionalisation of the Company has led to the consolidation of a profitable and steady growth in nine countries where the multinational operates, as well as to complying with commitments when dealing with international markets.

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

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





#### 2. OBJECTIVES OF THE CIRSA CSR POLICY

CIRSA develops its corporate project sustainably for society, citizens, clients, employees, investors and communities close to its operational centres providing an efficient, profitable and quality service.

The Company is especially sensitive to improving society and its well-being. A commitment based on four action areas:

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

Similarly, CIRSA bases its corporate commitment strategy on promoting Responsible Gaming, an element completely and deeply rooted in the core of its business.

Gaming can provide people a way to improve their social and emotional well-being, as it enriches their environment and brings benefits that have repercussions in their professional and personal relationships.

The majority of the adult population enjoys this type of entertainment in a safe and responsible way as another of their leisure activities. However, as the World Health Organization (WHO) states, there are a certain minority of users that, due to various factors, have difficulties interacting with the gaming environment in a responsible way. This figure represents 0.3% of the population of Spain (2017).

For CIRSA, as a Company in a regulated sector that creates high rates of employability, it is fundamental to support these people through promoting a culture of Responsible Gaming that promotes the proper use of the entertaining activity providing the elements required to detect and assess potential problem areas.

To achieve this, the Company develops actions and promotes dialogue between the sector, the Public Administration and different actors that are part of the gaming value chain in order to encourage and guarantee a positive environment.



# 3, CROSS-CUTTING PRINCIPLES OF ACTION

In order to comply with its corporate commitment objectives, the Company promotes the following cross-cutting principles of action:

#### **3.1 Transparency**

CIRSA implements a series of actions that aim to promote a true and transparent image:

- Sharing, both with the general public and internally, relevant and reliable information on the activities and actions developed by the Company.
- Producing and announcing financial and non-financial information on the Company's activity, collaborating with independent external verifiers such as auditors.

#### 3.2 Responsible taxation, sustainable growth and acquisitions protocol

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

In the same vein, the Company also collaborated in Spain in the pilot phase and was a pioneer in the introduction of the immediate supply of information (SII), or VAT in real time. This project establishes that companies which turn over more than six million euros should communicate to the Tax Agency the VAT of all the invoices they issue and receive every four days.

On the other hand, CIRSA bases its activity on a strategy of sustainable growth taking into account the different actors and communities it interacts with for its decision-making; from public authorities to its clients and main stakeholders.

The Company also develops a sustainable acquisitions protocol which takes into account the return of each operation and whose main premise is the responsible constitution and acquisition of companies.

#### 3.3 Commitment to employees

Employees are the driving force for CIRSA's activity, as well as the element that contributes the greatest added value. That is why, a commitment to its employees is a priority in the definition of the Company's CSR policy, which is promoted through the following principles:

- Respect for people and non-discrimination relating to race, nationality, social origin, age, gender, sexual orientation, ideology, religion or other physical, emotional or social conditions.
- Promotion of professionalism and professional development, fairly and equally.
- Commitment to talent.



- Duty to the health and safety of employees.
- Promotion of a fair remuneration policy.
- Professional and family life balance.



#### 3.4 Commitment to the client

CIRSA promotes leisure and entertainment and, therefore, views their business completely in line with the needs and expectations of clients, which is maintained by the firm commitment to provide them with the best service at all times. Therefore, it promises to promote their well-being through the following actions:

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

#### 3.5 Commitment to investors

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

- Equal treatment between all investors that are part of CIRSA, both current and potential.
- The provision of information that ensures an informed participation for all investors.
- The promotion of reliable and up-to-date information on the Company's activity.



#### 3.6 Commitment to the community

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

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

## 3.7 Commitment to the supplier

The relationship with the people or companies that act as suppliers of CIRSA is also essential in its CSR policy. In this regard, the Company promotes a centralised system of purchase processes on a global scale that takes the commitment to suppliers that are socially responsible into special consideration.

Similarly, the Company promotes other actions, such as:

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

#### 3.8 Efficiency and the environment

One of CIRSA's priority objectives is protecting the environment. For this it develops various initiatives that aim to reduce its environmental impact and to improve the efficiency of its centres. Some of these actions include:

• Reducing energy consumption and dependency by promoting efficiency through projects such as developing audits in halls and bingo halls; adopting measures to decrease electricity consumption, such as installing on/off switches on recreational



machines and presence detectors, or the remote control of air-conditioning in casinos, among others.

- Purchasing renewable energy for employees and rooms.
- Responsible waste management.
- Commitment to environmentally-responsible manufacturing processes.



#### 3.9 Innovation

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

- The promotion of research, development and innovation (R&D&i).
- The production of innovation projects based on sustainable models.
- The commitment to disruptive technology that helps to face new challenges, as well as to adapt to the changes and demands that are continuously emerging in our Industry.

## 4. SPECIFIC PRINCIPLES OF ACTION

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

#### 4.1 Detection of vulnerable situations in terms of Responsible Gaming

CIRSA sees people beyond their role as clients. That is why, it provides its services protecting users from risks that can be associated with the malpractice of gambling, such as addictions and extralimitations on values betted. Therefore, it promotes the development of a Responsible Gaming culture through campaigns that motivate the



people who visit its establishments to take a measured attitude towards gambling and to see this type of entertainment as a fun experience that can be shared with friends and family without the need for it to cause any type of economic or personal disadvantage. At the same time, and always in an educational manner, CIRSA informs its clients of the consequences that the misuse of the entertaining environment may result in and provides various resources to anyone who may need any type of support. In this regard, the Company develops its activity in two phases:

- **PREVENTIVE PHASES** (dependent on the Company's corporate commitment and promoted through internal and external communication channels of the organisation):
- Supporting the research of possible anomalous conducts and their damaging effects.
- Awareness training for employees.
- Informing citizens, and players in particular, on the principles and applying Responsible Gaming criteria.
- Promoting materials and communication actions and advertising, both in the institutional and private environment, that emphasise responsible participation in gambling.
- Encouraging specific prevention plans, designed for every gaming type and environment.
- **ACTIVE PHASES** (dependent on the health system of each jurisdiction where the Company operates):
- Active collaboration between the Company and public administrations in promoting prevention and social awareness.
- Promoting specific activities according to the severity of the problem detected.
- Recognizing pathological gambling.
- Reinforcing self-exclusion, whose voluntary registration impedes the player's access to the game.

# 4.2 Principle of action related to the internal promotion of social commitment

Social commitment is a value that impacts all the levels of an organisation and is present in the different strategies, operations and internal policies developed by the Company. In this sense, CIRSA promotes social commitment among its employees through two mechanisms:

• The promotion of responsible actions within the organisation, especially in the environment of responsible innovation and improving the environment.



• The promotion of social projects with actions such as collecting toys and Christmas campaigns or collaborating with social partners for specific projects in all countries where the Company is present.



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