



## Corporate ESG Policy

November 2023



## CONTENTS

- 1.Introduction
- 2.Objective and scope of application
- 3.Commitments and Principles of Action
- 4.Communication and Dialogue with Stakeholders
- 5.Responsibility and Control
- 6.Information and Communication
- 7.Approval, Effectiveness

## **1. Introduction**

CIRSA Group takes the view that a comprehensive approach to environmental, social and governance (ESG) matters in its business model contributes to the Group's strategy in its different sectors of activity, while generating and contributing shared value for both the company and its stakeholders.

Thus, our Corporate ESG Policy is consistent with and respectful of the Group's principles of action, as well as with all other policies and standards developed by the company and incorporating the values and standards that must be observed in both internal and external professional relationships.

Our firm commitment to sustainable development is articulated through our adherence and observance of leading global sustainability initiatives such as:

1. Membership of the United Nations Global Compact
2. The Universal Declaration of Human Rights
3. The European Convention on Human Rights
4. The United Nations Guiding Principles on Companies and Human Rights
5. The International Labor Organization's Declaration on Fundamental Principles and Rights at Work
6. The OECD Guidelines for Multinational Enterprises

## **2.Objective and scope of application**

This policy applies to all companies that make up the CIRSA Group, as well as to investee companies not integrated in the group over which the company has effective control, within the legally established limits.

It aims to promote sustainability in all aspects of its corporate culture and across all levels of the same, contributing to the generation of trust and shared value. Likewise, it also aims to promote the achievement of the Group's strategic objectives through responsible and sustainable practices that allow for the prevention, minimization and mitigation of possible negative impacts deriving from our activity.

## **3.Commitments and Principles of Action**

CIRSA Group takes the view that in order to achieve sustainable development, we must act on four areas, the more general ones, such as environment (E), social (S) and governance (G), and a fourth area, which derives from our activity, Responsible Gaming.

Thus, it establishes its commitments and principles of action based on said aspects:

### 3.1.Commitment to Responsible Gaming

- To comply with current legislation on responsible gaming.
- To apply principles and practices aimed at preventing and addressing reckless behaviour around Gaming, in order to protect vulnerable groups.
- To create, promote and disseminate principles of responsible gaming among all employees and customers.
- To develop responsible gaming initiatives.
- To provide various resources to help those who exhibit risky behaviours and need support.

### 3.2.Commitment to the Environment (E)

- To respect applicable environmental regulations and ensure firm compliance with environmental requirements by its employees and suppliers.
- To ensure optimisation of energy consumption at our premises and a decrease in energy consumption through the use of non-renewable energy sources.
- To promote and achieve a culture of environmental protection among our employees and suppliers.
- To make rational use of resources, developing initiatives in the area of circular economy applied to our business.

### 3.3.Commitment to Employees and Society (S)

- To comply with current legislation on working conditions, with special emphasis on the principles of the United Nations Universal Declaration of Human Rights.
- To prevent and avoid situations arising from psychosocial risks by having protocols and measures in place to ensure the correct operation of the reporting channels and the corrective actions that may arise from the same.
- To promote diversity and equal opportunities in talent selection and retention. In addition, to promote the professional development of our employees in a motivating and inclusive environment.
- To maintain a safe and healthy workspace through preventive risk management, taking preventive and corrective measures, and promoting and protecting safety and health among employees.
- To make a commitment to only work in regulated markets and through local companies.

### 3.4.Commitment to Good Governance, Ethics and Integrity, and Good Practices in the Value Chain (G)

- To encourage honest and ethical behaviour that entails not hesitating in avoiding and rejecting any form of corruption. Our activity is designed so that every person within the company strictly complies with current legislation everywhere we do business.

- To provide training on compliance (anti-corruption, money laundering, etc.) to all staff whose work is related to regulatory compliance.
- To ensure the operation of internal control mechanisms and ensure compliance with the expected behaviours in terms of good governance, ethics and integrity.
- To promote a culture of sustainability and ethical behaviour among all employees in their daily activities.
- To nurture our relationship with customers, focusing on the following actions:
  - Provide quality service, monitoring the customer experience with the Group through satisfaction surveys or other means that allow for active and permanent listening.
  - Protect due confidentiality in the processing of personal data of all users.
  - Manage and resolve complaints in a timely manner, to ensure satisfaction is optimal.
- Cultivate our relationship with suppliers, establishing the following actions:
  - Ensuring that suppliers comply with the Group's sustainability values and with the principles established in this Policy, as well as in other applicable internal regulatory frameworks.
  - Driving compliance with sustainability or ESG aspects that allow CIRSA Group commitments to be applied along the entire value chain.
- Safeguarding the protection and improvement of the environment throughout the value chain, promoting the use of resources in a responsible and rational manner, applying an efficiency approach and seeking to minimise environmental impacts.

#### **4.Communication and Dialogue with Stakeholders**

CIRSA Group will make available to its stakeholders various channels of communication, participation and dialogue, and will commit to giving them as much dissemination as possible.

It will also strive to maintain channels for active listening and dialogue with stakeholders with the aim of:

- Finding out the expectations of parties that affect or may be significantly affected by the company's activities and services.
- Establishing relationships of trust on the basis of dialogue, collaboration and mutual benefit, by establishing appropriate and efficient communication channels.
- Promoting a culture of sustainability among all employees in their daily activities.

#### **5.Responsibility and Control**

While the CIRSA Group Board of Directors is ultimately responsible for the corporate ESG policy, the company has a specific Corporate Directorate for ESG management, as well as an internal ESG committee with the following functions:

- Periodically assessing and reviewing corporate ESG policy to meet its mission of integrating social criteria and taking into account, as appropriate, the needs of the remaining stakeholders.
- Coordinating the environmental sustainability function, while ensuring cross-sectionality across the group. Driving sustainability actions and projects.
- Collaborating with corporate areas and business units, through working groups, in the sustainable and responsible management of CIRSA.
- Monitoring ESG performance to ensure alignment with the objectives and strategic actions to be developed and with the commitments of this Policy.

## **6.Information and Communication**

Transparency and communication are critical factors in conveying trust and credibility, to markets and investors, as well as to employees, customers and other stakeholders. That is why the CIRSA group undertakes to:

- Maintain responsible communication, marketing and advertising policies, taking into account the reputational risks that may arise from possible breach of the same.
- Keep various channels of communication, participation and dialogue available to its stakeholders; and review and update them on an ongoing basis.
- Promote and require sustainability commitments that are consistent/similar to those defined internally from their entire value chain: customers, partners, suppliers of products and services and other stakeholders.
- Disseminate relevant and reliable information about CIRSA's ESG sustainability activities and performance, in particular with respect to shareholders, institutional investors, the financial community and financial and extra-financial rating agencies.
- Promote transparency and accountability, assuming the commitment to prepare and publish annually financial and non-financial information about its activity. In addition, CIRSA will make public both the additional information required by the applicable regulations in each country, as well as any information provided voluntarily.

## **7.Approval, Effectiveness and Update**

This ESG Corporate Policy has been approved by the CIRSA Group Board of Directors at its meeting held on November 17, 2023.

It is fully in effect in all its terms from said time.

This Policy will be revised whenever there are variations in strategic objectives or applicable legislation.

### Information box

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V.1	Approvement	-	Board of Directors	17/11/2023

### Change Control

Version	Change description
V.1	Initial Redaction