



Responsible Gaming Policy

November 2023



1. Objective

CIRSA is firmly committed to ensuring a safe and healthy gaming environment for its customers. This document is intended to comply with this commitment.

This Responsible Gaming policy includes the set of guidelines, practices and actions aimed at preventing and detecting problem gaming, mitigating the damage of risky behaviour and encouraging customers to take a responsible attitude when it comes to gambling.

Also, it is a document that contains standards of conduct that must be strictly followed by all Company personnel and is structured with policies, procedures and control measures that CIRSA has developed and implemented, taking as reference academic knowledge and international best practices in responsible gaming, in order to support Customers and comply with the regulations that establish the minimum requirements regarding Responsible Gaming.

1.1. Introduction

Gaming is a leisure activity that can provide people with a way to improve their social and emotional well-being by enriching their environment and providing benefits that impact on their professional and personal relationships. Therefore, in no way should it be understood as a possible means of freeing oneself from financial or emotional problems.

The majority of the adult population enjoys gaming in a safe, fun and controlled way as another facet of their leisure activities. However, as the World Health Organization (WHO) explains, there are a minority of Users who, due to various factors, have difficulty relating to gaming in a responsible way.

We are aware that behind the statistics there are real situations that affect people, which is why CIRSA believes it is essential to promote a culture of Responsible Gaming that encourages the proper use of this activity, providing the necessary tools to detect and evaluate possible problematic situations and behaviours. Our Company is a strong advocate of the idea that our sector is sustainable only if the context in which it is conducted is healthy and controlled.

In addition to the preventive and proactive actions inherent to the Company's efforts to promote Responsible Gaming, CIRSA is part of numerous associations in the field, focusing on the different subsectors that make up our activity, and participates actively in them. These bodies, together with various Public Authorities, are responsible for setting out major lines of action to promote Responsible Gaming. At CIRSA, we are proactive in calling for and applying the necessary protection measures for those groups that are most vulnerable to a possible misuse of gaming, as well against harmful practices that may occur in our industry. In this regard, the Company encourages and participates in plans that fight against illegal gaming and companies and people that do not comply with the appropriate regulations for the sector relating to Responsible Gaming.

Note: The various studies that have been carried out in Spain by the Directorate General for Gambling Regulation (Dirección General de Ordenación del Juego [DGOJ]), under the National Drug and Gambling Plan, reveal that between 0.2% and 0.5% of Spaniards are addicted to gambling.

1.2. The Culture of Responsible Gaming

As an Operator in a regulated sector, CIRSA maintains a firm commitment to Society and the well-being of its customers. It is for this reason that the Company develops the necessary mechanisms to protect its users and remains vigilant to the risks that may be associated with risky gambling practices, such as addictions or the placing of bets that are financially unviable.

The Company believes it is essential to create a culture of prevention and knowledge that raises awareness around potential gambling disorders.

In this sense, the Company works on the promotion of campaigns and preventive actions that encourage Customers to take a measured approach to gambling.

In addition, CIRSA provides mechanisms for users to view gaming as a social entertainment activity that can be shared with friends and family.

In the markets in which it operates, for example in Colombia and Spain, CIRSA works hand in hand with entities dedicated to helping people suffering from gambling addictions. These partnerships make it possible to see the negative effects of addiction and, most importantly, to raise awareness of possible abusive or uncontrolled gambling disorders.

2. Scope

This is a corporate policy and therefore applies to all CIRSA group companies. The necessary bases, instruments and mechanisms are established for adequate and efficient coordination between all Group companies. All without harming or affecting the autonomous decision-making capacity of each company.

3. Reference or Query Standards

Application of the various national and international standards related to Responsible Gaming, based on which the policies on Responsible Gaming are established.

For example:

- Spain - Law 13/2011, of 27 May. Articles 6, 6.3 and 8
- Spain - Advertising Decree 958/2020, of 3 November
- Spain - Royal Decree 176/2023, of 14 March
- Colombia - Resolution 20214000036784 of 16 December 2021, issued by Coljuegos

4. Responsibilities

It is the responsibility of the CIRSA group to create, promote and disseminate said policy on responsible gaming among all its employees, and it is their responsibility to act in accordance with the practices described in this policy according to their scope of activity.

5. Definitions

- **Responsible Gaming:** This term refers to principles and practices aimed at preventing and addressing reckless behaviour around Gaming, in order to protect vulnerable groups.
- **Vulnerable Groups:** The term vulnerable groups refers to sectors of society such as minors (<18 years), people on low-income, people with gambling addictions, and those suffering from mental illness or psychological disorders.
- **Responsible Gaming Officer:** individual appointed as set forth in this policy, to lead the Responsible Gaming Programme.
- **RG:** acronym for Responsible Gaming.
- **Player:** an individual, of legal age, who places bets or pays for the right to participate in a game of luck or chance to an entity acting in the capacity of an authorised Operator, which, in exchange, offers the player a prize in money or in kind, which he or she will win if they correctly guess the result thereof, this result not being foreseeable with certainty because it is determined by luck, chance or coincidence.
- **Social player:** a person who gambles occasionally or regularly, for entertainment, making a rational choice regarding this leisure activity based on their own limits in terms of time and money. They have complete control over that behaviour and can leave or stop it whenever they want.
- **Problem player:** a person who gambles frequently or even on a daily basis, usually spending an amount of money that, on occasion can be excessive, such as to cause problems for them, but is not severe enough for them to be considered a pathological player. He or she has less control over their impulses than the social player, and the greater regularity with which they gamble requires them to spend more and dedicate more time to it, but they go to work regularly and do not neglect family, being able to lead a normal life. They are considered people at high risk of becoming pathological players.
- **Pathological player:** Characterised by an emotional dependence on gambling, a loss of control over the same, and interference of gambling in the normal functioning of daily life.
- **Compulsive or pathological gambling:** This is an irrepressible impulse to gamble, despite being aware of its consequences and a desire to stop. It is recognised as a disease by the World Health Organization (WHO).
- **Self-Exclusion:** A voluntary process in which individuals can opt out of the gaming site or specific areas of the same. This is a self-help and self-control technique that allows you to take a break and assess the possible consequences of your pattern of behaviour when it comes to gambling.

- **Self-diagnostic test:** self-assessment tool available for the player to assess whether he or she is in a situation that requires the adoption of preventive measures or uncontrolled gaming mitigation.
- **Authorised operator:** legal entity authorised by the corresponding authority to operate games of luck and chance.

6. Policy description

6.1. Principles of Action in Responsible Gaming Culture

6.1.1. Detecting Vulnerable Situations

In a systematic and proactive manner, CIRSA informs its Customers of the consequences of misusing the gaming environment. It also provides a variety of resources to those who exhibit at-risk behaviours and require support.

In this sense, the Company articulates its actions in two phases:

- **PREVENTIVE PHASES** in line with industry best practices to foster a safe gaming environment, disseminated through the Organisation's internal and external communication channels:

- ✓ Establishment of systems for detecting possible problem cases in gaming establishments.
- ✓ Development of internal awareness training with varying formats adapted to each employee's role:
 - **Ongoing/specific training:** based on each person's technical role.
 - **Smart Pills:** group-based short training sessions.
 - **Languages:** ongoing training in English, French or Italian with the aim of correctly and transparently serving and informing users from different backgrounds.
- ✓ Information for the general public, and in particular Customers, on the principles and application of the Responsible Gaming policy. As an example, our gaming Establishments feature written advice to users like only playing with whatever amount of money each person can afford to spend.
- ✓ Promotion of specific prevention plans designed for each game type and environment. These include regulated betting, not offering credit under any circumstances, not allowing access to children, self-exclusion programmes and a responsible alcoholic beverage service.
- ✓ Support for research into potential abnormal behaviours and harmful effects.

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

- ✓ Active collaboration between the Company and the Authorities in promoting prevention and social awareness programmes.
- ✓ Promotion of specific actions based on the severity of the problem detected.
- ✓ Collaboration with institutions that develop therapeutic treatments.
- ✓ Reinforcing self-exclusion programmes, where voluntary registration prevents players from accessing the activity.

6.2. Promotion and Prevention Actions

6.2.1. Advertising

CIRSA designs and structures its advertising campaigns taking into account the following promotion and prevention criteria:

- Business communications may not be aimed directly or indirectly at minors (**<18 years**) or vulnerable individuals.
- Under no circumstances are children or vulnerable individuals used in an advertising campaign to promote gaming.
- No advertising material is given to minors.
- The company disseminates its Responsible Gaming programme communication campaign in all Company Commercial premises and in the communication channels available to it.
- The company website has a direct link to the Responsible Gaming section, which must be clearly visible on the homepage.
- The company provides clear information to Customers about Responsible Gaming and the risks that uncontrolled gaming can generate.
- The company has information materials, such as brochures and posters, among others, that generate a level of awareness regarding the Responsible Gaming programme and the implications of uncontrolled gaming.

6.2.2. Training

CIRSA, drives and encourages:

- **Internal training**
 - Conducting education, training, promotion and prevention programmes related to Responsible Gaming on a periodic basis and adapted to the needs of each function.

- The Company will ensure that all Employees are trained and informed about the Responsible Gaming programme.
- **External training**
 - Awareness training and actions to encourage informed decision-making by customers.

6.2.3. Self-control actions

a. Management of Customer Self-Exclusion

Self-exclusion is a decision taken by the player in strict exercise of his self-control and will power. It is intended as a tool for making conscious and informed decisions regarding gaming and, therefore, it is the player's own responsibility to fulfil it, without prejudice to the actions that the Operator may take with respect to excluded players to ensure compliance with the self-exclusion decision.

During Access controls for the gaming Rooms, staff of the Admission and/or Security Service will check the identity of the person seeking access, and at the same time will verify whether they are included in the "Registry of barred or self-excluded individuals" provided by the Administration, wherever the rule so requires.

- If an individual is on the list of self-excluded persons, entry to the premises will be denied.
- If the "self-excluded" or "banned" customer has gained access to the Gaming Room, they will be invited to leave, and this request will be reported, and if they do not agree to leave the establishment, the collaboration of the Security staff and/or competent authority will be requested to remove the Customer.

See protocol: **Protocol for the entry of minors and self-excluded individuals.**

b. Self-diagnosis test

CIRSA will have a self-assessment tool (self-diagnosis test), which will be available to the player physically and digitally so that he/she can assess whether they are in a situation that requires taking preventive or mitigation measures against uncontrolled gaming and which will help guide their personal decisions regarding gaming.

6.3. Responsible Gaming "RG" Mechanisms

6.3.1. Prevention Policies

CIRSA's Responsible Gaming Policy lays the necessary foundations to generate robust control and self-control tools and schemes to reduce the impact of inappropriate game use, as detailed below:

Minors:

- All access points to our establishments, as well as all machines/slots, include clearly visible signs stating that **access and play are forbidden to minors (<18 years)**.
- Admission/Security Staff at all access doors will check the Customer identity details and will deny entry to the gaming premises to minors. Security Staff and/or Business Managers must maintain thorough controls to ensure that this rule is enforced.
- If any minor has gained access to the establishment, upon detecting this situation, the Gaming Director/Manager/Employee responsible for the Room will invite him/her to leave the establishment, making a report of what happened in case the competent Authority needs to be notified. If the minor should refuse to leave, the Security Staff will help to bring about the minor's removal from the premises.

See protocol: **Protocol for the entry of minors and self-excluded individuals.**

Young Adults:

The company defines young adults as those in the age range between 18 years and 25 years old. While there is no specific regulation that restricts young adults' access to gaming, a number of measures will be taken to ensure a safe and healthy gaming environment among these customers.

People who are drunk or under the influence of banned substances

- All CIRSA establishments have clearly and conspicuously visible signs stating that **people who are under the influence of alcohol, drugs, narcotics or psychotropic products are not allowed access to the Gaming Rooms.**
- If Admission Staff (Casinos and Bingo Halls in Spain), Security Staff (Casinos in Latam) or Employees (Gaming Rooms) working the access doors, believe that the attitude or behaviour of a person who intends to access the Gaming Room reveal that they are under the influence of alcohol or any banned substance, they will deny them entry to the Room based on reservation of the "right of admission".
- If they have already gained access, they will be invited to leave the establishment, making a report of what happened in case the competent Authority needs to be informed. In the event of resistance, the Security Staff will help to bring about the individual's immediate removal from the premises.
- A&B Staff will not supply alcoholic beverages to Customers who begin to show signs of intoxication. This will allow the Customer to make gaming decisions with full awareness.

See protocol: **Protocol for the entry of minors and self-excluded individuals.**

Miscellaneous:

- Operational Staff will be prepared to provide information or guidance regarding the approach adopted by the Company when it comes to Responsible Gaming “RG”.
- No items offered by Customers as collateral or pledges will be accepted. Only authorised means of payment (cash, credit and/or debit cards, regulated payment platforms) will be accepted.
- Under no circumstances will credit be granted to Customers.
- When Customers are in a period of self-exclusion, any type of commercial promotion directed at such customers is prohibited.

6.3.2. Red flags relating to compulsive gambling and handling of these situations by staff

When any worker observes a red flag in relation to Responsible Gaming, they must immediately report it to the Room Manager or Supervisor, indicating the reasons why this is considered to be the case, in order to ensure that the information is described truthfully and completely.

Among the main “red flags” that help recognise a person suffering from this type of addiction are:

- Worried appearance
- Requires increasingly high bets
- Abstinence is impossible
- Evasion
- Places significant relationships at risk
- Lying
- Revenge
- Loss of control
- Immoral acts

Once the Room Supervisor has detected and verified this behaviour, they will proceed discreetly and subtly to talk with the Customer to ask them to take a break. If necessary, and additionally, they should inform them of the help tools available, such as the Responsible Gaming brochure, the self-diagnosis test and the directory of specialist professionals.

6.3.3. Actions to support those affected

It is very difficult for people to recognise that they suffer from some type of gambling addiction, but having a true desire to overcome the problem is the best tool to combat it. As with other addictions, comprehensive rehabilitation is required, including psychological care, education, and family support.

CIRSA has no competence to provide this service, as this type of care requires treatment by professionals. The suitability of the professional or the institution depends on the validity of

their official licence or official recognition to practise this type of activity. The treatment of people with gambling-related problems is handled exclusively by certified professionals in the field. Under this understanding, CIRSA will have complete and updated information from specialist organisations that can provide support to players who require it, including treatment centres and health professionals, for which CIRSA will seek to maintain an active dialogue with the main interest groups and will have a directory with the institutions that provide treatment services to people who suffer from uncontrolled gambling.

6.3.4. Responsible Gaming “RG” Committee

The Corporate Responsible Gaming Committee acts as a corporate body, being in charge of validating the policies, strategy and culture regarding responsible gaming.

This committee is made up of the heads of the different lines of business, as well as HR, Legal, Communications and ESG.

Functions:

The main functions of the committee are:

- Ensure compliance with the provisions of this policy.
- Define and periodically review the company’s strategy and action plan on Responsible Gaming.
- Meet periodically to evaluate the actions and/or activities to be carried out within the Company, to keep Customers informed about Responsible Gaming.
- Develop information campaigns on Responsible Gaming.
- Design campaigns to generate a culture of Responsible Gaming.
- Be aware of the provisions issued by the Responsible Gaming Control Entities, so that the alerts and controls to be implemented in CIRSA are identified in a timely manner.

The resolutions adopted by the committee will be recorded in Minutes, which will document the content of the meeting, as well as the decisions adopted.

The decisions adopted by the Committee and recorded in the respective minutes must be adequately communicated to each of the responsible and/or affected parties.

Information box

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