Sustainability Report 2023

CIRSA

This document constitutes the statement of non-financial information (Estado de Información No Financiera, EINF) of the Company CIRSA ENTERPRISES, S.A. and its consolidated group of companies that comprise it (hereinafter CIRSA, see appendix). This EINF has been prepared to comply with the provisions of Law 11/2018 of 28 December 2018. The information contained in the EINF, although presented in a separate document, is part of the Consolidated Management Report of the CIRSA group. The European Commission's non-financial reporting guidelines (2017/C 215/01) derived from Directive 2014/95/EU and the Global Reporting Initiative Standards (GRI Standards) have been considered in its preparation.

CIRSA

Sustainability is at the heart of our growth

Message from the Chairman

To be successful in today's global economy, it is essential to understand who we are, what our values are and the rules of the game that govern us, as well as not remaining oblivious to the changes that are occurring in both the geopolitical and climate scenarios. At CIRSA we know who we are. We know what we value. And we are tremendously empathetic and supportive of those who have had to face adverse and unforeseen situations. We consider that this is the path to get where we want and also in a way that is perfectly aligned with the future that best suits us all.

At the heart of our values is the permanent commitment to managing our company responsibly and incorporating sustainability criteria. At CIRSA we always seek to improve efficiency in everything we do and, in this sense, the efficient use of our resources, whatever type they may be, waste management and reducing our environmental impact is part of our DNA. Sustainability is not only a strategic commitment to protecting our ecosystems, but it also makes sense from the point of view of creating business value.

A recognition of this continuous commitment is having obtained a rating of 12 points, which places us in the **"Low Risk"** range in the **Sustainalytics sustainability rating**, positioning us in the **top 3** of the companies in our sector **worldwide**. One of the aspects with the highest rating is our **Responsible Gaming** policy.

At CIRSA we recognise the importance of Responsible Gaming as the cornerstone of our operations. We are committed to ensuring that our gaming activities are carried out ethically and transparently, promoting responsible practices that safeguard fun and entertainment without compromising the safety of our customers. This excellent rating has been complemented by obtaining the **G4 (Global Gambling Guidance Group) and ECA (European Casino Association) certifications**, accrediting the high level of performance in the implementation of our Responsible Gaming policies.

"We are committed to ensuring that our gaming activities are carried out ethically and transparently, promoting responsible practices that safeguard fun and entertainment without compromising the safety of our customers."

In addition to our commitment to Responsible Gaming, having a solid good governance framework and committed people management are essential elements for our comprehensive sustainability approach.

Our good governance structure is based on **transparency, responsibility and equity**, with the objective of ensuring that our operations are aligned with the highest ethical standards. As an example, we have obtained the international anti-corruption and fraud certification issued by the **ICPF (Institute for Regulatory Compliance and Fraud Prevention)**.

Moreover, in our people management, we seek to **create an inclusive environment** where each team member feels valued and supported.

We encourage professional development, diversity and equal opportunities, recognising that the wellbeing and satisfaction of our employees are fundamental pillars for the sustainable success of the company.
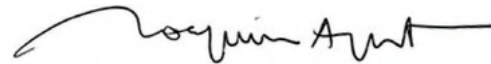
Together, our focus on good governance and people management not only reinforces the integrity of our internal practices, but also contributes to building a strong corporate culture oriented towards well-being and sustainable growth.

This report illustrates all the ways in which we demonstrate our commitment to sustainability in 2023. It has been a year of great improvements in our businesses and good results, endorsed by our firm commitment to always placing **ESG criteria at the centre of our strategy.**

In short, our historical and excellent track record of economic results would have no value if we could not complement it with other excellence derived from ESG management as a whole.

We are certainly excited about the opportunities we have to continue on our course, guided by our policies and supported by our successes, with the assurance of even greater progress in the coming years.

"Our focus on good governance and people management not only reinforces the integrity of our internal practices, but also contributes to building a strong corporate culture oriented towards well-being and sustainable growth."

Joaquim Agut
Executive Chairman of CIRSA

About this report

ESG criteria

Our communication strategy is based on ensuring the transparency of our activities. In the light of this commitment, we provide our stakeholders with the most complete information on our ESG strategy, goals and the results obtained.

In line with this **commitment**, we are publishing our report on **ESG (responsible gaming, environmental, social environment and corporate governance) criteria** for 2023, where we report on our progress in environmental, social and governance matters.

This document is also an exercise in transparency. It aims to inform our stakeholders of the Group's progress in the field of sustainability, both internally and externally.

In order to facilitate the reader's understanding of the evolution of our business from its origin, we also include figures and milestones related to previous years.

To prepare this report, we have followed a broad and rigorous process that implements a system for the definition, measurement, management and reporting of each KPI (key performance indicator) in the **nine countries in which we are present**. In addition, its content includes a **materiality analysis and assessment**, as well an **analysis of risk management**, helping us to delve into aspects of the ESG criteria most relevant to our company and our stakeholders.

This ESG report reflects all areas related to these criteria, which we have a responsibility to deal with as a leader in the gaming industry. With it we want to explain how we, at CIRSA, manage risks and opportunities in relation to social, environmental and governance issues.

Its structure focuses on the relevant aspects necessary to understand CIRSA's business development, as well as its market position and the development of the ESG criteria. We explain each of their purpose, strategy and performance.

We start with the core of this ESG report, which is Responsible Gaming. Then we move on to the environmental and social aspects of our business, which are divided into two sections: our people and our contribution to society. Finally, we discuss compliance and corporate governance.

This **report has been reviewed and approved by the Company's Board of Directors**. Likewise, it has been **verified by an independent third party** and covers the activity of the CIRSA Group both nationally and internationally, and includes initiatives and performance metrics of our global operations between **1 January and 31 December 2023**, the same period as we report for the Group's **financial information**.

The contents included in this report are supplemented by the rest of the publications and information available on our corporate website, www.cirsa.com

This report was published on 22 March 2024.

Materiality assessment and matrix

As a demonstration of our commitment to sustainability and using it as a strategic tool, a global materiality analysis of the entire company has been carried out.

The purpose of this study is to identify and prioritise the most relevant aspects for the Company, based on an analysis of its impact on its environmental and socioeconomic environment. These aspects have been classified following the ESG perspective.

The analysis was performed with the reference point being the **Global Reporting Initiative (GRI)** in its standard "GRI 3: Material topics", as well as what is defined in the ESRS (European Sustainability Reporting Standards) standards regarding the materiality analyses of companies. This exercise lays the foundations for a **future double materiality analysis**, which will be addressed by the Company **during 2024**, incorporating the financial perspective into this analysis.

The proposal to involve the Company's main stakeholders in the analysis is a key piece of the process, which has been structured as follows:

1.

Context of the industry and business model analysis

In the first phase of the work, a context analysis was carried out of the sector in which CIRSA operates, in addition to the company's business model. This allowed us to more closely analyse the most relevant ESG topics.

The issues discussed include:

- Trends in the business model and in sustainability, through the study of sector reports or other sources.
- Benchmark of industry competitors.
- ESG analysts and frameworks (MSCI, SASB, etc.)

To achieve a comprehensive outcome of the Company's impacts, the focus has been placed on each of its lines of business on an individualised basis. Understanding the particularities of each of the Company's activities has made the analysis more accurate. Below are the areas analysed:

| Casinos | Online gaming and betting | Operation of slot machines Spain | Operation of slot machines Italy |

2.

Identification of impacts and material issues

Subsequently, we carried out a detailed analysis of each of the Company's lines of business and their respective activities.

In this phase of the work, internal meetings were held with managers from different business areas, in order to correctly identify CIRSA's main impacts. The result is a list of 59 impacts, both positive and negative, current and potential.

Together with these key Company employees, we were also able to identify **the Scope, Probability and Remediability** of these impacts.

To complete the analysis and facilitate its understanding, impacts have been classified by ESG topics, which, in turn, correspond to the three sustainability verticals: Environmental, Social and Governance (ESG)

Environmental topics (E)

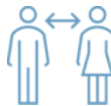| Energy consumption | Greenhouse gas (GHG) emissions | Water consumption and management | Resource use | Circular economy and waste management |

Social topics (S)

| Talent management and working conditions | Health and safety | Value chain employees | Equality, diversity and inclusion | Safe gaming | Impact on local communities | Relationship with consumers |

Governance topics (G)

| Business ethics and governance | Corruption, bribery and Money laundering | Digitisation and innovation | Cybersecurity and data processing |

3.

Impact prioritisation

The assessment of the impacts has been carried out using a methodology that has combined their scope, probability and remediation.

As an essential part of the process, we have involved the Company's main stakeholders, both internal and external, using the most appropriate method for each one, carrying out a total of more than 50 interviews and questionnaires.

- **Internal stakeholders:** impact assessment through interviews and questionnaires given to the Sustainability department, executives and employees.
- **External stakeholders:** impact assessment through interviews with customers, suppliers and industry associations.

Internal stakeholders

Managers
Prioritising topics through interviews

Employees
Prioritising topics through questionnaires

External stakeholders

Sector association
Prioritisation of topics through interviews

Customer
Prioritisation of topics through interviews

Supplier
Prioritisation of topics through interviews

4.

Data processing and results

Finally, the information obtained after consultations with stakeholders has been collected and processed, identifying the main topics linked to each of the identified impacts.
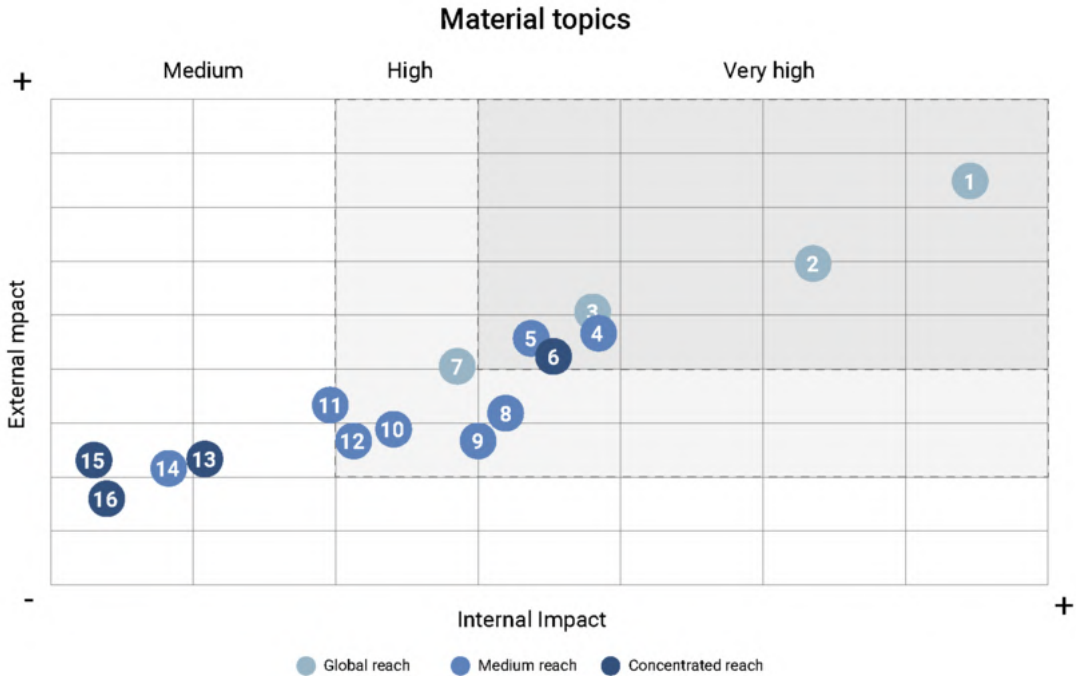
The result of this final part of the process is a list of the impacts and ESG issues that are most relevant for the Company, in the light of their scope, probability and remediability, as well as the scale of importance granted to it by its stakeholders.

The results have been validated by CIRSA management, who have played a critical role in the process.

The matrix includes prioritising the most relevant ESG topics for CIRSA. That identification stems from the impact analysis that the Company carried out.

In the assessment, the scope, probability and remediability of the impacts have been considered, as well as the assessments assigned by the stakeholders participating in the consultation process.

As a result, we identified 16 topics relevant topics to the Company, which in turn have been classified as very high, high and medium level of importance, as represented in the following matrix:

The axes reflect the degree of relevance of each of the aspects assessed.

Very high impact

1. Safe gaming
2. Cybersecurity and data processing
3. Corruption, bribery and money laundering
4. Impact on local communities
5. Talent management and working conditions
6. Occupational health and safety

High impact

7. Value chain employees
8. Equality, Diversity and Inclusion
9. Energy consumption
10. Greenhouse gas (GHG) emissions
11. Digitisation and innovation
12. Circular economy and waste management

Medium impact

13. Resource use
14. Business ethics and governance
15. Relationship with consumers
16. Water consumption and management

Once the material topics have been analysed, this report provides information throughout its text regarding the high-priority topics, as defined by CIRSA, after their materiality analysis.

About us

Industry leaders since 1978

Our business activity

WHAT WE DO

CIRSA is a leading multinational recreational gaming and betting company operating in Spain and Latin America. It began its activity in 1978 in Spain. Since then, from our position as a leader in our markets, we have expanded to Italy, Latin America and Morocco.

We offer the widest range of products and services in the gaming industry, from the design and manufacture of slot machines and software, to the management of slot machines, casinos, online gaming and sports betting.

As of 31 December 2023, 13,861 people work at CIRSA in more than 439 establishments in nine countries. Our activity takes place both in our casinos and in third-party premises.

We have **four main business units**:

Casinos

Within the casino business we include our retail offering of self-managed halls that include in all cases a wide variety of slot machines, electronic roulette along with other electronic games, as well as in some cases traditional gaming tables and bingo. All this offer is complemented by a wide range of services, such as gastronomy and shows.

Online gaming and betting

Our online gaming offering includes sports betting, casino games and social games. These services are primarily offered under the Sportium and E-Play24 brand. In addition, we manage sports bets in gaming halls and bars, that allow us to offer an omnichannel entertainment experience to all our customers.

Operation of slot machines Spain

Operation of slot machines (AWP) in bars, cafes and restaurants. Likewise, from the B2B division we design, manufacture and market slot machines for the Spanish market, in addition to developing and marketing software to manage casinos. The full range of products and services is distributed to the Group and other companies.
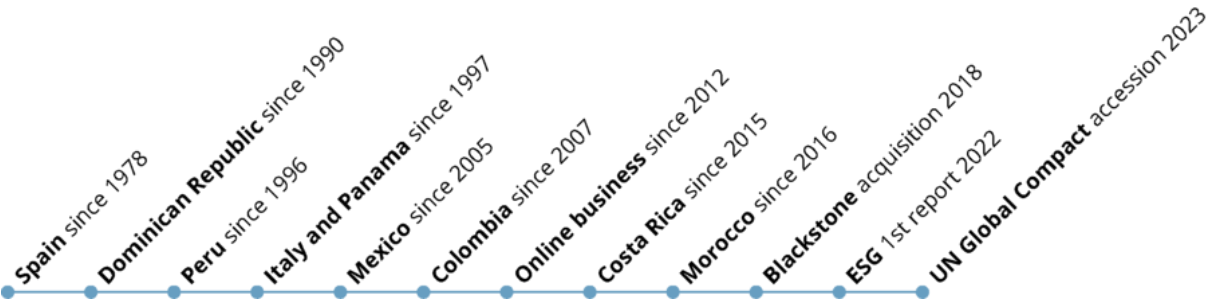

Operation of slot machines Italy

Operation of slot machines (AWP and VLT) in bars, cafes, restaurants, gaming halls and traditional bingos.

MARKET POSITION

We are a leading multinational company in the recreational gaming and betting sector in Spain and Latin America, not only in terms of market share, but also as a leading company recognised for its creativity, innovation, professionalism, diversity, service and turnover.

Since our inception in 1978, we have delivered bespoke solutions and the best products and services to our markets and customers. Unlike online companies and new companies in the industry, CIRSA has had a presence for years in each of its markets, where we have always renewed our licences and concessions when they expire. Not only has this given us a leadership position in terms of market share, but it has also generated a proven and enduring commitment to the highest standards of professional ethics and regulatory compliance in every country in which we have a presence. This has been widely recognised by policymakers, customers and other stakeholders. Here are the most relevant milestones:

Spain *since 1978* — Dominican Republic *since 1990* — Peru *since 1996* — Italy and Panama *since 1997* — Mexico *since 2005* — Colombia *since 2007* — Online business *since 2012* — Costa Rica *since 2015* — Morocco *since 2016* — Blackstone *acquisition 2018* — ESG *1st report 2022* — UN Global Compact *accession 2023*

As a Group, we strive to maximise our efficiency and productivity while developing and consolidating profitable and sustainable growth through robust investment plans correctly implemented. The current management team joined CIRSA in July 2006. Since then, it has always met all of its commitments. In July 2018, Blackstone acquired a majority share in CIRSA, contributing its deep knowledge of and weight within the financial market to the development of our strategy. **In this year 2023 we have joined the United Nations Global Compact**.

We strive to maximise our efficiency and productivity while developing and consolidating profitable growth, through robust investment plans correctly implemented, supported by a diverse and sustainable business strategy.

+ profitable growth, business consolidation and selective acquisitions	+ unique diversification by region and game segment
+ development of a sustainable and successful multi-channel business model	+ achievement of a solid leadership position in the various markets in which we are present

CIRSA's NUMBERS

As of 31 December 2023, we manage a total of 439 casinos, 82,207 slot machines and 648 gaming tables. We receive more than 50 million visitors annually, consolidating our offer as a global entertainment space. In addition, we coordinate the holding of thousands of events, complementing the gaming experience offered in our establishments.

CIRSA's offering is present in nine countries, all of them without exception countries with regulated markets.

Mexico

Casinos	28
Slot machines	7,244
Tables	147
Online gaming	✔

Dominican Republic

Casinos	6
Slot machines	890
Betting houses	2
Tables	73

CIRSA

Casinos*	439
Slot machines	82,207
Betting houses	2,445
Tables	648

Spain

Casinos*	266
Slot machines	40,368
Betting houses	2,152
Tables	52
Online gaming	✔

Costa Rica

Casinos	7
Slot machines	843
Tables	19

Panama

Casinos	34
Slot machines	8,326
Betting houses	40
Tables	11
Online gaming	✔

Colombia

Casinos	70
Slot machines	7,458
Betting houses	177
Tables	252
Online gaming	✔

Peru

Casinos	19
Slot machines	3,188
Tables	41
Betting houses	74

Morocco

Casinos	3
Slot machines	427
Tables	53

Italy

Casinos*	6
Slot machines	13,463
Online gaming	✔

*Includes gaming halls

In places where there is no ✔ , we do not offer online gaming because it is not regulated.

Risk management

Identification, evaluation and effective management

Goal and strategy

CIRSA has implemented a comprehensive Risk Control and Management System (RCMS), following the principles and methodology outlined in the COSO framework ("Committee of Sponsoring Organisations of the Treadway Commission"). The fundamental purpose of the RCMS is to optimise the generation of economic value and promote the sustainable growth of the Group, carefully considering the risks to which it is exposed. The identification, evaluation and effective management of these risks provide CIRSA with greater certainty in making decisions and achieving its strategic objectives. Likewise, the RCMS seeks to provide stakeholders and the market in general with an appropriate level of security in the preservation and maximisation of the value generated.

Main Milestones 2023

- Implementation of a global GRC (Governance, Risk and Compliance) tool that allows comprehensive management of the Group's various risk models.

- Active promotion of a risk culture within the Organisation and at all levels.

- Update of the Group's Risk Control and Management Policy.

- Reinforcement of the Risk and Internal Control unit as well as the Internal Audit unit.

- Establishment of the Advisory Board made up of 4 members (equal composition) with advisory functions to the Board of Directors as well as the various business and corporate areas, with special focus on ESG, Audit, Compliance and Cybersecurity.

Priorities 2024

- Complete the implementation of an Internal Control System over Financial Information (ICFI).

- Complete the implementation of an Internal Control System over Non-Financial Information (ICNFI).

- Continue working on the adoption of TCFD (Task force on Climate-related Financial Disclosures) good practices in reporting climate risks and opportunities.

- Future integration of the Advisory Board into the Board of Directors and formation of the Audit and Sustainability Committee and the Appointments and Remuneration Committee, without prejudice to the advice to the various areas.

RISK GOVERNANCE

The RCMS is promoted by the Board of Directors (BoD) and by the Company's Senior Management; however, the various corporate and business units are proactively part of the RCMS and their responsibilities are clearly defined in the risk model.

- **Board of Directors:** Has the responsibility of approving the CIRSA Group's Risk Control and Management Policy, establishing the strategy and level of risk appetite, as well as general supervision of the Group's risks and controls.
- **Senior Management:** Has the responsibility of monitoring and managing the Group's identified risks, as well as identifying emerging risks and monitoring risk indicators.
- **Business units:** Identify and manage risks in the day-to-day operations of the Group within its business areas.
- **Corporate Risk and Internal Control Department:** Advises the Group's business units in the risk identification and management process, as well as in the implementation and continuous improvement of internal controls that mitigate risks.
- **Corporate internal audit department:** Through its annual audit plan, it evaluates the effectiveness of the Group's internal control system and is responsible for reporting the RCMS assurance level to Group Management.

To manage the RCMS, the CIRSA Group follows the three lines of defence model to ensure that risks are managed and supervised in an effective and efficient manner.

The CIRSA model allows the Group to promote an appropriate risk culture within the organisation, as well as facilitating risk management reporting for better decision-making by the BoD.
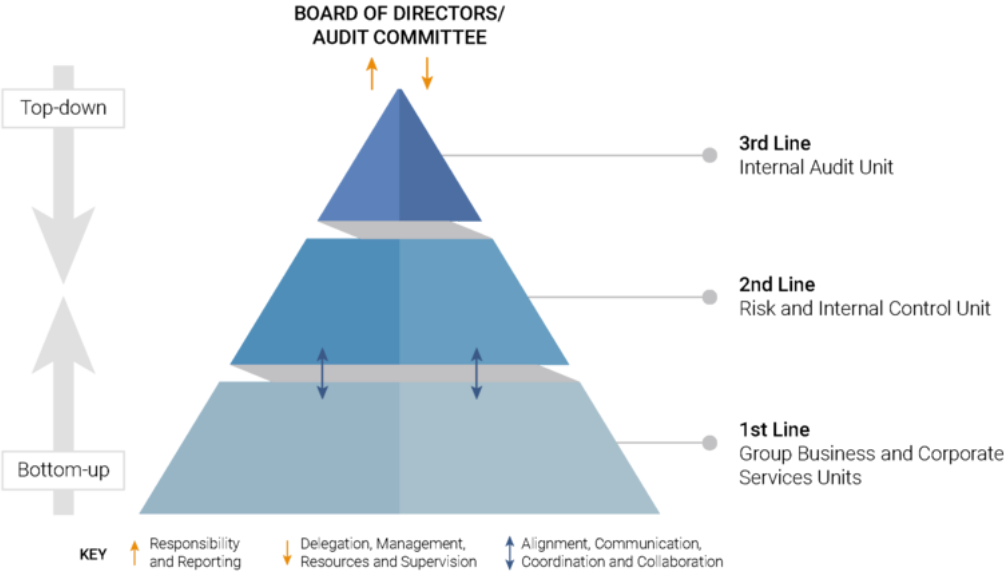
The Group has a comprehensive approach from the highest levels of the organisation to the lowest (top-down / bottom-up approach). From top to bottom (top-down), the general risk management guidelines and policies are established at a strategic level, dictated by the Board of Directors. On the other hand, from the bottom up (bottom-up), the participation of employees and teams of business and corporate units is encouraged in the identification and evaluation of specific risks in their areas.

1st line functions

- Design, implement, document and maintain risks in their areas of responsibility (they are the owners of the risks).
- Report practices or behaviours that may pose a risk.
- Design, implement, document and maintain controls to minimise the impact of risks (they own the controls in their area).
- Evaluate and review risks and controls at least annually.
- Comply with action plans linked to controls.

2nd line functions

- Document, design, implement and maintain the common framework, methodology and internal control and risk management systems (not the risks and controls themselves).
- Provide training and clear methodology for risk assessment that guides the front line in their risk management functions.
- Provide a global and homogeneous vision of the Group's risk level.
- Guide, advise and support the organisation in risk management.
- Report annually to the Board of Directors.

3rd line functions

- Monitor the effectiveness of internal control.
- Know the financial information process and internal control systems.
- Identify risks, mitigation measures and risk control and management systems.
- Communicate recommendations, alerts and conclusions to Group Management and those responsible for the business areas and companies evaluated.

This approach combines the global strategic vision with the detailed experience and knowledge of those directly involved in daily operations.

Seamless communication between levels ensures that risk management is consistent with strategic objectives, while effectively addressing practical concerns and challenges at each level of the organisation.
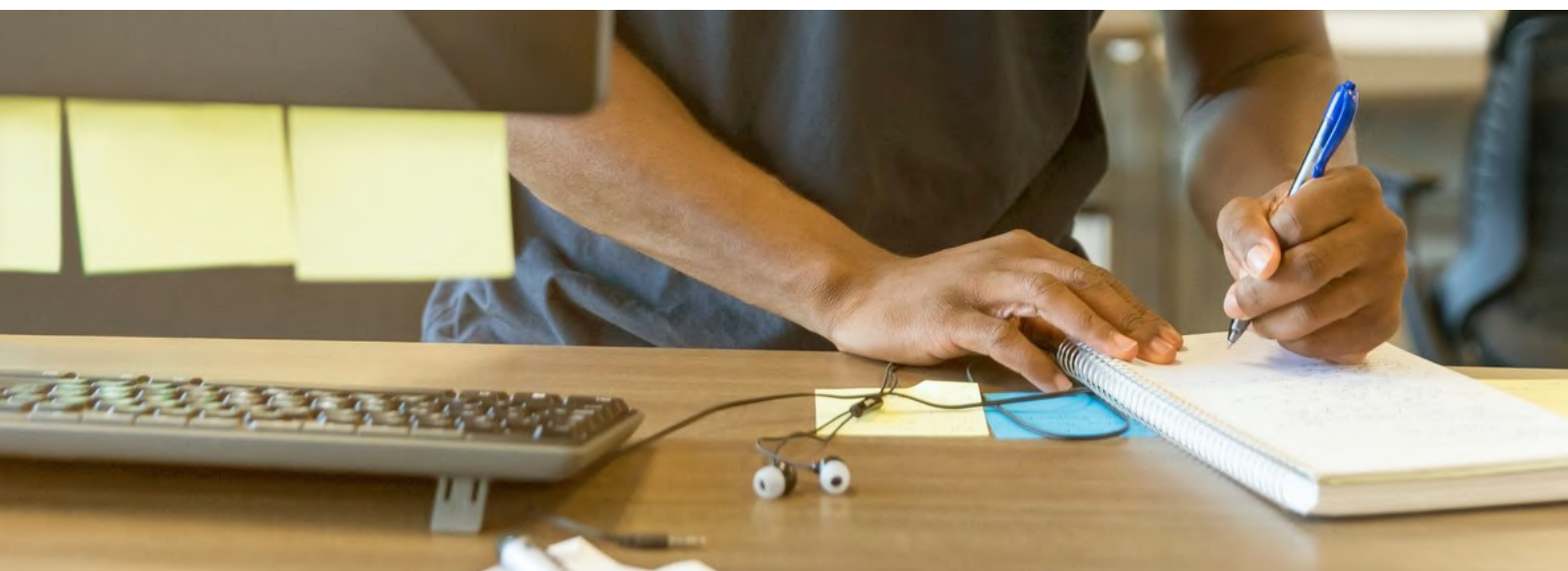
CIRSA

RISK MANAGEMENT PROCESS

The CIRSA Group operates through a solid risk management process, which includes the strategic objectives of the organisation, whose goal is to achieve maximum performance of operations by exhaustively considering the risks it faces. The integration of the Risk Management Life Cycle allows it to optimise the Risk Control and Management System through a risk assessment methodology aligned and adapted to the needs of the organisation. The risk management process follows the criteria established by COSO ("Committee of Sponsoring Organisations of the Treadway Commission").

1. Identifying risks

Risk identification at CIRSA is carried out by holding Risk Assessment (RA) meetings with the key interlocutors of the Divisions/Departments (Members of Senior Management and key personnel of the business units). In these sessions, the key processes of the Division/Area are analysed and possible risks that may affect the achievement of the objectives established by the Board of Directors and Senior Management are detected.

Risks are inventoried and classified according to their category and the owners of each risk are identified. The identified risks can be handled in different management models (Corporate, criminal, continuity, ICFI, ICNFI, among others).

2. Assessing risks

The risk assessment is carried out annually during the review process led by the Risk and Internal Control Department. Risk owners evaluate identified risks according to the risk scoring matrix to determine their criticality and proceed with their handling.

The risk model determines the criticality of inherent risks based on two factors:

- Impact: The potential impact is calculated from 3 variables (taking into account their weighting in the calculation of the total impact):

    Economic: Economic impact on the income statement and/or investments.
    Operational: Impact on the area's operations and its impact on relationships with third parties.
    Reputational: Impact on the media.

- Probability: Possibility of the risk occurring

From the result of multiplying the impact and the scored probability, the criticality of the inherent risk is obtained, understood as the level of risk without considering any type of response to the risk, allowing the Company to prioritise the handling of the evaluated risks.

3. Responses to risk

Once the inherent risk has been evaluated, the response to them must be defined, which may be:

- Mitigate: control measures aimed at reducing the impact or probability of occurrence of the risk are designed and implemented to a level acceptable to the organisation.
- Sharing/transfer: actions are carried out aimed at sharing/transferring part of the risk with third parties, for example, through contracting insurance, searching for partners, outsourcing processes, etc.
- Avoid: it is decided to suspend the activity that causes the risk so that the risk associated with it disappears.
- Do not manage: it is decided not to take any action on the risk in question, accepting its consequences and its probability of occurrence, classifying it as a non-manageable risk.

The type of response applied is determined based on the risk appetite defined in the Group's risk management policy.

4. Monitoring risks

Senior Management and key personnel of the business units are responsible for monitoring the risks of their areas and for managing the control measures implemented to ensure that the managed risks are within the risk appetite defined in the Risk Control and Management Policy of the CIRSA Group.

If deviations in the residual risk level above the tolerance established in the Policy are detected, those responsible must carry out an action plan to remedy the situation.

5. Continuous improvement

In order to guarantee the effectiveness of the RCMS, the Risk and Internal Control Department continuously monitors the model to monitor the evolution of risks and ensure that existing, as well as emerging, risks are managed appropriately at all times and Senior Management and the Board of Directors always have information available for decision-making.

RISK APPETITE

The Board assumes responsibility for establishing the degree of risk that the Group is willing to accept, ensuring that it is in line with the objectives and defined strategy, and that an optimal balance is obtained between risk assumption and profitability.

OUR MAIN RISKS DETECTED

The understanding and effective management of the risks and uncertainties that impact our business constitute the basis on which the Board and Senior Management base their decisions. This strategic approach provides confidence that our operations are supported by informed and prudent decision-making, thereby strengthening the transparency and robustness of our corporate governance.

This section shows the main ESG risks, as well as the emerging risks identified by the Group through the annual risk management process carried out during the 2023 financial year.

Corporate risks
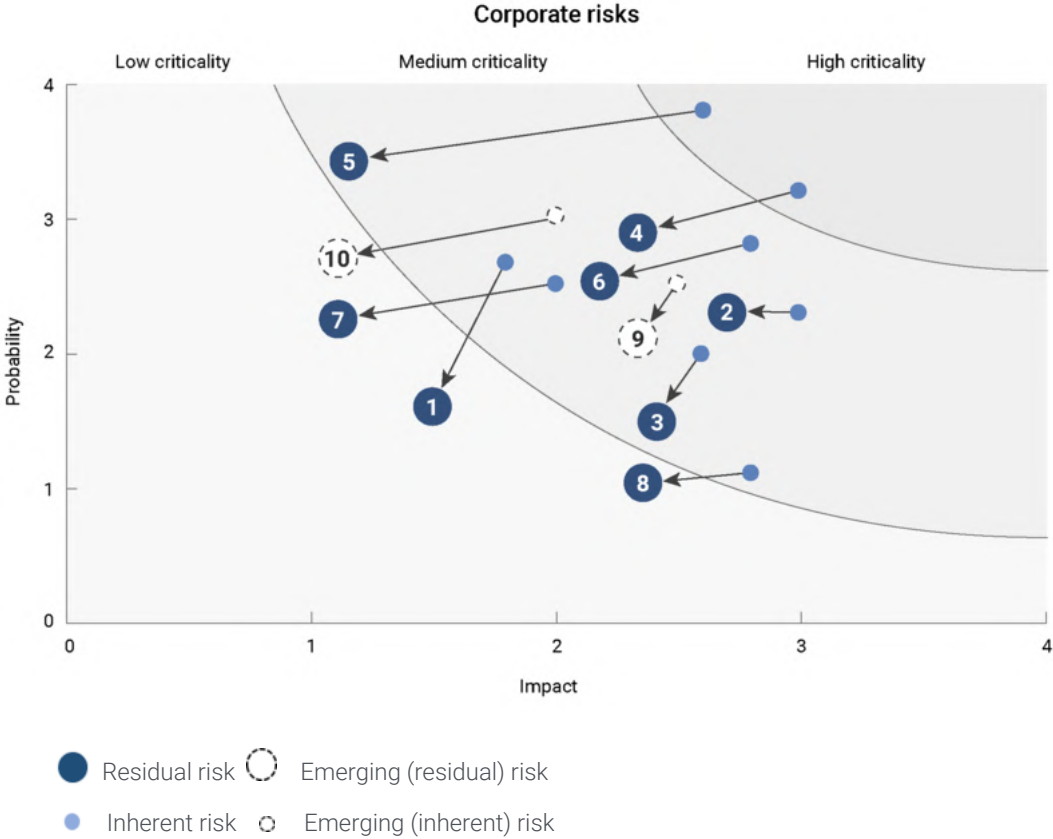
no.	Risks
1	Responsible Gaming
2	Geopolitical risks
3	Speed of innovation and technological development
4	Regulation and taxation of gambling, betting and online gaming
5	Cybersecurity
6	Competition
7	Talent attraction and retention
8	Pandemic or natural disaster
9	Climate change mitigation
10	Adaptation to climate change

Risks		Possible Effects of Risk	Mitigation measures	
			Controls	Assessment
1	Responsible Gaming	The Group is firmly committed to its strategy of creating a responsible gaming environment within all its business lines. The inability to create, maintain and promote a culture of Responsible Gaming and a safe gaming environment has a negative impact on users and society, affecting the sustainability of CIRSA's activities and business.	> Creation of a Responsible Gaming Committee in charge of validating policies, strategy and culture in relation to Responsible Gaming. > The Company has a responsible gaming policy that is reviewed periodically. > Obtaining certificates in Responsible Gaming from various organizations (COFAR, G4, ECA among others). > Member of the Responsible Gambling Advisory Council (CAJR) of the General Directorate of Gambling Regulation (DGOJ). > Collaborations with various national and international organizations in the field of addiction prevention and treatment.	Inherent criticality MEDIUM Mitigation* Residual criticality LOW
2	Geopolitical risks	Geopolitical changes can impact the business model through an increase in uncertainty or even political instability in the countries where the Group operates, negatively affecting the sector, user demand and the operations of the centres.	> Permanent contact with Public Administrations through the Institutional Relations area. > Monitoring of the geopolitical situation of the countries in which the Group operates.	Inherent criticality MEDIUM Mitigation* Residual criticality MEDIUM
3	Speed of innovation and technological development	The absence of adequate technological development, which can manifest itself both in technological obsolescence and in the lack of investment in new technologies, has a direct impact on CIRSA's competitiveness in the market and its ability to offer a modern and satisfactory gaming experience to meet demand and changes in customer tastes and preferences.	> The Group has various policies in reference to the organisation's systems to ensure their constant updating.	Inherent criticality MEDIUM Mitigation* Residual criticality MEDIUM
4	Regulation and taxation of gambling, betting and online gaming	In the countries where CIRSA operates, regulatory and legislative changes may occur, ranging from technical aspects of gaming machines, gaming license requirements, to limitations on advertising and promotion of gaming, and which could considerably affect the company's operations, damaging its business model and, consequently, generating a negative impact on its income. Moreover, taxation on gaming activities may be altered, increasing the Group's tax burden and reducing its results.	> Continuous review of official bulletins. >Continuous participation in legal associations and committees. > Permanent contact with Public Administrations through the Institutional Relations area.	Inherent criticality HIGH Mitigation* Residual criticality MEDIUM
5	Cybersecurity	The increase in cybercrime may compromise the confidentiality, integrity and/or availability of information relevant to the company and even business continuity. Cyberattacks may include data theft, extortion, service interruption and other incidents that affect information security, customer trust and the Group's reputation.	> Implementation of firm and concise Policies and Procedures (including audits). > Own cybersecurity team. > Optimal and cutting-edge cybersecurity technology (Gartner Tier 1). > Carrying out training for all employees.	Inherent criticality HIGH Mitigation* Residual criticality MEDIUM

	Risks	Possible effects of risk	Mitigation measures — Controls	Mitigation measures — Assessment	
				Inherent criticality	
6	Competition	The lack of competition between service providers specialising in gaming platforms and sports content for betting can generate a strong dependence on third parties in online gaming and betting platforms. A high degree of dependence and/or concentration of suppliers can generate a risk for CIRSA due to the reduction of available alternatives and the increase in the bargaining power of suppliers.	> Supplier diversification through a map of suppliers identified and organized for the various operations and platforms. > Internal development process for our own gaming platforms.	MEDIUM	
				Mitigation*	▮▮▯▯▯
				Residual criticality	
				MEDIUM	
7	Talent attraction and retention	The lack of a clear HR strategy and policies can lead to the following threats for CIRSA: - Difficulty in retaining talent in the company and not being able to prevent the competition, by offering more attractive conditions, from causing key talent (especially technology) to leave the company and they may prefer to choose other types of technology companies, such as start-ups. - Lack of ability to attract talent in the company due to not having a clear offer and a remuneration package (beyond the economic one) that can attract the appropriate talent that is necessary in the company. - The headquarters located in Terrassa could be an obstacle to attracting talent.	> Provision of specific action plans for the Human Resources area, designed to address various aspects related to the development and retention of talent at CIRSA.	Inherent criticality	
				MEDIUM	
				Mitigation*	▮▯▯▯▯
				Residual criticality	
				LOW	
8	Pandemic or natural disaster	Closure of the Group's physical centres of activity due to unforeseeable exogenous causes such as a pandemic, natural disaster or other situations. These closures may have a significant impact on CIRSA's operations and revenues, especially if they continue for extended periods.	> Group Continuity Plan.	Inherent criticality	
				MEDIUM	
				Mitigation*	▮▯▯▯▯
				Residual criticality	
				LOW	
9	Climate change mitigation	Inaction to reduce greenhouse gas emissions to stop climate change can have negative consequences for the climate, ecosystems and society in the medium and long term. The chronic increase in the average temperature of the planet as well as the frequency and severity of extreme weather events will negatively impact the Group's activities and its users, in addition to the indirect impacts due to the changes produced in ecosystems.	> Decarbonization plan to reduce greenhouse gas (GHG) emissions. > Reduction of energy and water consumption. > Installation of solar panels. > Renewable energy consumption (GO). > Replacement of the vehicle fleet with a more sustainable fleet.	Inherent criticality	
				MEDIUM	
				Mitigation*	▮▯▯▯▯
				Residual criticality	
				MEDIUM	
10	Adaptation to climate change	The Group's lack of capacity to adapt to the changes that are occurring due to climate change can generate negative economic impacts due to several factors such as acute physical damage caused by extreme weather events, increased regulation and reporting requirements for environmental information, an increase in environmental regulatory requirements (e.g. energy certificates, emissions limits, etc.), increased debt costs, a change in customer behaviour and/or reputational impacts among stakeholders of the Group due to an increase in its environmental demands.	> Group Continuity Plan. > Permanent contact with independent experts to anticipate possible regulatory changes and identify new reporting requirements. > Adaptation of the Group's premises to current environmental regulations. > Continuous improvement of ESG indicators to access better financing. > Adoption of best practices in ESG matters to meet the expectations of stakeholders.	Inherent criticality	
				MEDIUM	
				Mitigation*	▮▮▯▯▯
				Residual criticality	
				LOW	

*Mitigation: Percentage of reduction in the criticality of the risk.

▮▯▯▯▯ ≤ 25%   ▮▮▯▯▯ 25% <> 50%   ▮▮▮▯▯ 50% <> 75%

OUR INITIATIVE IN TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES (TCFD)

The CIRSA Group is fully aware of the threat that climate change poses to its operations, as well as its influence on ecosystems and society. In addition to the obvious risks, climate change also carries significant impacts in terms of security, public health, and economic stability. Addressing these challenges has become a key priority for CIRSA, which seeks not only to mitigate the associated risks but also to lead initiatives that foster the Group's sustainability and resilience in all facets of its operations and its impact on the community.

As part of our commitment, in 2023 the Group has begun a process of integrating climate risks within its RCMS following the recommendations of the TCFD. With the aim of becoming aware of the impact on the environment arising from our activity, the Group has begun to carry out an analysis focused on risks derived from climate change to quantify their impacts and probabilities and identify opportunities for improvement.

ESG at a glance

We ensure the integration of ESG criteria

ESG commitment and goals

Since its founding in 1978, the implementation of CIRSA's strategy has been guided by sustainability and aligned with the United Nations sustainable development goals to which we remain committed.

To address material issues, through the **ESG Committee** we focus on **four areas** of action in which we can make a greater contribution: **Responsible Gaming, environment, social environment** (CIRSA team and our contribution to society) and, finally, **corporate governance** and regulatory compliance.

In order to guarantee the execution of our sustainability strategy, we have an ESG Committee that, under the supervision of the Executive Chairman, is made up of the ESG director and the corporate directors who lead each of the areas where the aspects of greatest relevance from an ESG perspective are included, all of them with more than 10 years of experience in their respective responsibilities.

Composition of the ESG Committee

The short/medium term strategic priorities for sustainability are to continue with:

- Responsible Gaming policies, measures and training.

- Ensure regulatory compliance, working exclusively in regulated markets.

- Promotion of diverse and safe work environments.

- Consolidate our commitment to the local communities where we operate.

- Reduction of environmental impact, betting on renewable energies and technological improvements.

The Company has thus assembled the necessary human and technical resources to properly manage all four areas, extending its values to its suppliers and the rest of the agents that make up its value chain.

At CIRSA we ensure the integration of ESG criteria into our internal processes, such as decision making and risk analysis in internal operations and investments, as well as in supply chain management or other processes that may involve any type of environmental, energy or climate related impact.

In this year, 2023, **5 meetings** of the ESG committee have been held.

Our strategy is aligned with the **Sustainable Development Goals (SDG)** of the United Nations Global Compact, committing us to actively contribute to building a more just, sustainable and equitable world.

Aim	Direct Impact	Indirect Impact	Area
1 End of Poverty	●		Contribution to society
2 Zero hunger	●		Contribution to society
3 Health and well-being	●		Social, Responsible Gaming
4 Quality education	●		Social
5 Gender Equality	●		Social
6 Clean water and sanitation		●	
7 Affordable and non-polluting energy	●		Environment
8 Decent work and economic growth	●		Social
9 Industry, innovation and infrastructure	●		Governance
10 Reduction of inequalities	●		Social
11 Sustainable cities and communities	●		Environment
12 Responsible production and consumption	●		Responsible Gaming
13 Climate action	●		Environment
14 Underwater life		●	
15 Life of terrestrial ecosystems		●	
16 Peace, justice and strong institutions	●		Contribution to society, Governance
17 Alliances to achieve the objectives	●		Contribution to society, Governance

CIRSA

ACHIEVEMENTS 2023

We are very proud of the progress we have made in terms of sustainability. These are some of the achievements reached during 2023.

Adherence to the United Nations Global Compact

We have recently adhered to the United Nations Global Compact as a further step in our strategy and alignment with the principles of responsible management and sustainability of international bodies.

Communication Campaign "At Cirsa We Are ESG"

Communication campaign through which we give visibility to our commitment to ESG and our progress in sustainability both internally and externally.

ESG Risk Rating

We have been evaluated by one of the most prestigious agencies, Sustainalytics, obtaining a rating of 12.0 that classifies us as a company with Low Risk in ESG matters.

Top 3 Casino Industry
Rating 12.0
Low Risk

Corporate Sustainability Assessment (CSA)

We have been invited to Standard&Poors' Corporate Sustainability Assessment (CSA), obtaining a rating that places us in the 80th percentile within the Casino industry.

80th percentile
Casino Industry

Double Certification in Responsible Gaming

This year we have obtained double certification in Responsible Gaming for our casinos in Spain. These certificates have been granted by the European Casino Association (ECA) and by the Global Gambling Guidance Group (G4).

Collaboration Agreement with the UAB University

We have signed an agreement to carry out applied research work on gambling, sports betting, game use, addictions and associated psychosocial processes.

Climate Ambition Accelerator

We are committed to the sustainability of the planet. We have participated in the United Nations Climate Ambition Accelerator programme.

"We Are the Future" Campaign

We have launched an outreach campaign with advice to encourage, among other things, the responsible use of water among Group employees.

Initiatives in favour of gender equality

We have adhered to the United Nations Women's Empowerment Principles initiative and have participated in Target Gender Equality.

Volunteering among our employees

We facilitate the participation of our employees in volunteer tasks. For example, in Spain we have participated in collecting food for the most disadvantaged people.

International Anti-Corruption Certification

Obtaining the International Anti-Corruption and Fraud certification issued by the Institute for Regulatory Compliance and Fraud Prevention in Spain (ICPF).

Annual Cybersecurity Assessment

CIRSA remains in the first quartile and above the baseline in Blackstone's Annual Cybersecurity Assessment.

RESPONSIBLE GAMING

We are committed to providing the best recreational gaming options to our customers, responsibly, striving to make safe, Responsible Gaming the norm in every country where we operate.

15,942

certified premises in 2023
(95% of premises)

Double Responsible Gaming
certification

100%

of employees of gaming
establishments trained in
Responsible Gaming

Goal	Degree of compliance
Ensure that 90% of premises are certified in Responsible Gaming certificate for 2024	We guarantee a safe space in our points of sale (bars and restaurants). We have certified 95% of the premises in which we manage slot machines, exceeding the objective set for 2024 during the year 2023.
Ensure that 100% of our business employees are trained in Responsible Gaming	In 2022 we trained all our gaming halls staff in Spain, which in 2023 has been joined by all the gaming halls staff in the rest of the countries, achieving our goal.

ENVIRONMENT

Based on the principles that support our business strategy, a common factor in our locations is their low environmental impact, achieved through to the integration of environmental responsibility criteria into their respective design processes.

64%

of our electricity consumption
comes from renewable energies

GREEN HALL
CIRSA

32%

reduction in emissions in the
period 2015-2023

Goal	Degree of compliance
65% reduction of GHG emissions voluntarily by 2030	We maintain our goal of reducing greenhouse gas emissions by 65% by 2030, compared to 2022 emissions level.
Achieve 95% renewable energy consumption in 2030	We currently have 64% renewable energy consumption, increasing this percentage to 90% if we only consider the countries in our portfolio where there is actually the possibility of contracting energy from renewable sources (GO).

SOCIAL

The people who are part of our Company are our most valuable asset and a key part of our business success. We follow a culture model that is employee-centred and based on excellence - it is our core value.

49%	**50%**	**95%**
of our workforce are women	of women in gaming halls management positions	indefinite contracts
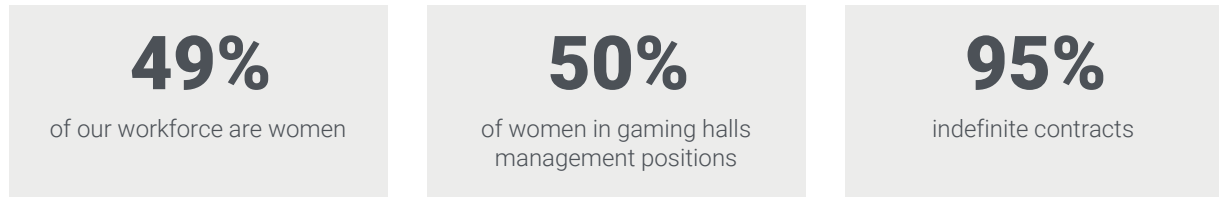
Goal	Degree of compliance
Maintain the link between internal promotion and recruiting above 90%	We are committed to keeping the link between internal promotion and hiring above 90% to ensure our employees have sufficient growth opportunities.
Exceed 50% of women in management positions in gaming halls	One of the most important positions in our organisation is the management of gaming halls. Once we reach 50% in 2023, we remain firm in our commitment to exceed 50% in the coming years.

CONTRIBUTION TO SOCIETY

CIRSA is committed to working only in regulated markets through local companies, in order to contribute to the development of communities where we have a presence, and we do this by means of paying taxes on gaming and corporate activity (€795 million).

95%

of CIRSA staff are in local communities

€795million

paid in gaming and business taxes
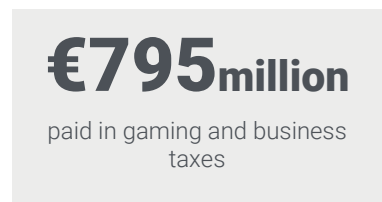
CORPORATE GOVERNANCE

Our commitment to regulatory compliance, security and privacy of information are factors that allow us to be one of the industry's leading companies and a benchmark at the enterprise level. We encourage honest and ethical behaviour, that entails not hesitating in avoiding and rejecting any form of corruption.

0	**14**	**0**
cases of data breach	meetings of Board of Directors	confirmed cases of bribery/ corruption
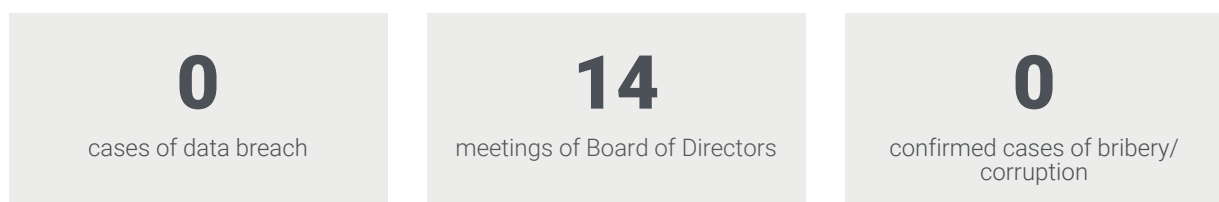
Responsible Gaming

We want long-term sustainable relationships with our customers

Goal and strategy

At CIRSA we want to ensure a friendly and personalised recreational gaming experience. That's why we make every effort to ensure that each and every person uses our services in a safe and responsible manner.

We understand that Responsible Gaming involves making assertive and informed decisions for the sole purpose of seeking entertainment and, under no circumstances, should gaming be used to address economic or emotional problems.

We work continuously to make our business safer and in line with **best practices in Responsible Gaming**. We strive to build long-term sustainable relationships with our customers by providing them with the best experience based on safety and entertainment.

Gaming can offer an alternative way to improve emotional wellbeing by benefiting the social environment and contributes positively contributing to personal interactions. However, although the majority of the adult population enjoys this type of entertainment in a safe and responsible way as part of their leisure activities, we are very aware that there

is a certain minority of users who, for different reasons, may experience some problems. In Spain, for example, this figure remains around 0.3% of the total population of legal age over the last few years. Source: DGOJ - Gaming and Society.

We offer our customers tools to responsibly manage their experience in our establishments, as well as offering the resources necessary to meet the challenges posed by a fast-growing sector, such as online gaming.

Thus, we believe that it is vitally important that our Responsible Gaming strategy encompasses both physical and online gaming. That is why we take a dual approach that combines both preventive and proactive phases to create a true culture of Responsible Gaming that reaches all our customers.

PREVENTIVE ACTIONS	+	ACTIVE ACTIONS	=	RESPONSIBLE GAMING
Measures to encourage Responsible Gaming		Our help for problem gamblers		

*Playing responsibly and safely
is a key part of the sustainability of our activity.
To achieve this, it is of utmost importance to
empower and protect our customers
and train our employees on the subject of
Responsible Gaming*

Preventive actions measures to promote Responsible Gaming

- We are continuing with our campaign **"At CIRSA We Are Responsible Gaming"**, incorporating new elements in different media (digital QR).

- **Training and awareness** campaigns, to promote safer games of chance and offer our staff appropriate training.

- With regard to online gaming, we are making large investments in **artificial intelligence systems** to carefully monitor customers who interact with us and identify potential problematic behaviours, as well as offering tools that allow them to keep control.

- We are working to continue to raise awareness of our customers in relation to safe and balanced gaming in all countries in which CIRSA operates, facilitating Responsible Gaming and reporting potential gaming-related harm through **a strategic Responsible Gambling communication plan**.

Active actions taken to help problem gamblers

- We encourage active collaborations and partnerships with **research institutions** to provide assistance and guidance to people who have developed gambling problems.

- We actively participate in all **industry associations in the gaming sector** to foster these commitments and work on specific measures that ensure the highest levels of Responsible Gaming within our industry.

- We also collaborate with public administrations. For example, **in Spain we are part of the Responsible Gaming Advisory Council**, led by the Directorate General for the Regulation of Gambling (*Dirección General del Ordenación del Juego*, DGOJ).

Continuing with our commitment to Responsible Gaming, our traditional casinos in Spain have obtained the Responsible Gaming Certification from the European Casino Association (ECA) and the international entity G4.

CIRSA

Actions and results

OUR PREVENTIVE MEASURES TO FOSTER RESPONSIBLE GAMING

Responsible Gaming Certifications by the ECA and G4 entities

In 2022, we obtained Responsible Gaming certification at the corporate level from the international certifying entity G4. This certification recognised the policies and action plans regarding Responsible Gaming.

Continuing with our commitment, in this year 2023 all our casinos in Spain have obtained certification in Responsible Gaming by the **European Casino Association (ECA)** and by the entity **Global Gambling Guidance Group (G4)**.

These certifications demonstrate:

- Our firm commitment to Responsible Gaming policies and action plans.
- Our strong commitment to society, believing that people are more than just customers or consumers.
- Our tireless work so that playing continues to be part of entertainment, always defending the culture of Responsible Gaming through communication campaigns prepared exclusively for them.

Responsible Gaming training for our employees

At the end of 2023 **we have achieved our goal of training all our employees, both in Spain** (1,842 already in 2022) **and in the rest of the countries**, with a total of **9,078** employees in our gaming halls receiving training during this year 2023 (*) .

In this last quarter of 2023 we have started a second training for employees in Spain with a more dynamic course with simulation of real situations and going deeper into certain subjects. This course has been completed by **1,738** employees. It is planned to extend this training during 2024 for the rest of the countries.

7,340	**1,738**	**100%**
gaming halls employees trained outside Spain	gaming halls employees trained 2nd training in Spain	of employees trained in 2023

(*) Personnel included mainly from professional category 4 (indirect gaming hall), 5 (direct gaming hall) and to a lesser extent 3 (Marketing)

Responsible Gaming Committee

The Corporate Responsible Gaming Committee, **in charge of validating the policies, strategy and culture regarding Responsible Gaming** and made up of those responsible for the various lines of business, as well as HR, Legal, Communication and ESG, has been working this year 2023 specifically on the following projects:

- Specific actions for the Young-Adult segment (18-25).
- Voluntary adherence of customers to our Responsible Gaming programme.
- Preventive measures for our Staff.
- Update of the new Responsible Gaming policy.
- Preparation and supervision of the new training course on Responsible Gaming.
- Implementation of QR's in communication items (brochures, tickets...).

CIRSA obtains the award for the Company with the best actions in Responsible Gaming and CSR awarded by InfoPlay

At CIRSA We Are Responsible Gaming

We continue with the global campaign, in all the countries where we have a presence, of both internal and external communication with the objective of informing and empowering both our customers and our employees.

This has been implemented in a visible way in all of our gaming halls. We also make other responsible gaming tips available, including pamphlets, screens and information panels, self-assessment tests and explicit prohibition of access to children under 18. Additionally, we have implemented the use of QR's to make our recommendations more accessible.

Below are some of the elements implemented:

Client campaign brochure

Employee campaign flyers

Reverse TITO customer ticket

Stickers on machines and entrances to gaming halls

Awareness-raising actions

HAVE FUN! PLAY RESPONSIBLY

+18 If you are a minor or legally incapacitated, you cannot play

Depending on your circumstances, calculate the money and time you want to spend on entertainment and keep to that limit for the entire gaming session. Schedule breaks during games.

The only purpose of the game is to have fun Winning should not be your motivation for gambling

Always go to authorised gaming establishments.

Don't play to evade problems as moments of emotional conflict diminish your self-control.

Gaming should not affect your personal relationships - if it does, it could be a symptom of a gambling problem.

Play within your financial means.

Combine gaming with other forms of entertainment.

Self-assessment test
We make available to those customers who request it

RESPONSIBLE GAMING TEST AND THE PREVENTION OF ADDICTIVE GAMBLING BEHAVIOUR

1. Do you often find yourself remembering past gambling experiences, planning the next time you're going to play, and/or considering ways to get money to play with?
   Si
   No
2. Have you ever played with more money than you had intended?
   Si
   No
3. Do you try to control, interrupt, or stop the game?
   Si
   No
4. Does the attempt to interrupt or stop the game cause you to be restless or irritable?
   Si
   No
5. Do you gamble to get away from any problems?
   Si
   No
6. When you gamble your money away, do you play again to make up the lost money?
   Si
   No
7. Do you think you have any problems with gambling?
   Si
   No
8. Do you fund your gambling activity through family money, loans, counterfeit, fraud or theft?
   Si
   No
9. Have you ever lost work or class time because of gambling?
   Si
   No
10. Have you ever gone to someone to help you with your financial problems caused by gambling?
   Si
   No

Responsible Gaming certifications in the bars and restaurants sector

The operation of slot machines in hospitality establishments represents a fundamental asset for our company. For this reason, and as part of our promotion of the culture of Responsible Gaming in the sector, CIRSA and other leading gaming companies in Spain, together with COFAR (Confederación Española de Empresarios del Juego Recreativo en Hostelería [Spanish Confederation of Recreational Gaming Business Owners in Hospitality]), defined a certification programme to ensure that the bars and restaurants sector implemented personalised preventive and proactive measures to ensure safer gaming.

15,942
establishments
certified in 2023

+28%
vs 2022

95%
over total establishments

+23 pp
vs 2022
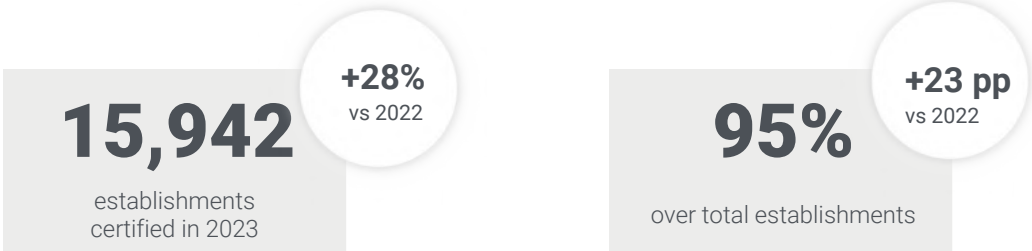
Establishments accredited by this programme publicly show their commitment to providing safe gaming products and ensuring that the activity is conducted under strict regulatory compliance.

The correct application of the programme was validated by the **SGS** entity in 2022.

Collaboration agreement between the Universitat Autònoma de Barcelona and CIRSA

It should be noted that in this year 2023 we have signed a collaboration agreement with the **Universitat Autònoma de Barcelona** in order to promote research in the field of games of chance, sports betting, addictions and associated psychosocial processes.

The **Universitat Autònoma de Barcelona** is an entity of recognised prestige that provides quality, diversified, multidisciplinary and flexible teaching, adjusted to the needs of society and adapted to the new models of the Europe of knowledge, with interest and sensitivity for the social reality that surrounds us.

Episteme, a third sector entity dedicated to applied social research and the evaluation of social policies and programmes, and a regular collaborator of the UAB, has also joined this agreement.

The objectives of this agreement are:

- To carry out applied research in the social sciences on recreational games, gambling, sports betting, uses of gambling, addictions and associated psychosocial processes.

- To promote the reciprocal exchange of information on research topics, publications and other materials of interest.

- To promote the transfer of knowledge from the University to society in the field of gambling, sports betting, uses of gambling, addictions and associated psychosocial processes.

- To offer ongoing advice on recreational and gambling matters.

- To promote debate and exchange of experiences on all those topics that can benefit these institutions.

Use of AI to address potential gambling problems

It is clear that the world of online gaming will continue to gain popularity in the near future as technological developments facilitate a more engaging experience. Therefore, we want to ensure a secure online gaming environment so that customers can make the most of their experience.

To achieve this goal, we apply AI technologies, specifically the computational model known as the "supervised artificial neural network" to monitor, detect and profile our customers, allowing us to protect them by identifying potential gambling problems. The control mechanisms are based on a matrix that includes 25 key indicators that refer to different elements present in the user's gaming operations. The system monitors different parameters:

- **Frequency/time:** The individual's hourly time spent on gambling-related activities. Among others, their days of activity, times between deposits, average hours between logins, etc. are taken into consideration.
- **Activity/volume:** style of play and amounts of bets and casino sessions of the player, as well as weekly deposits, withdrawals, among others.

- **Economic:** monetary amounts spent on the activity. It includes, for example: totals deposited, weekly average, number of logins in which there was a zero balance, etc.
- **Other factors:** several additional qualitative factors. For example, if the person is of an at-risk (young adults), age, uses their mobile phone or has been previously excluded (has at one point acknowledged that they have a problem).

It also offers weekly reports that allow us to identify risky gambling patterns.

If we detect that our customers are beginning to exhibit undesirable gaming behaviours, we communicate with them through four phases, through which we can offer tools to bring themselves under control and even temporarily suspend their accounts.

362
risky situations proactively detected through monitoring systems

-22.6%
vs 2022
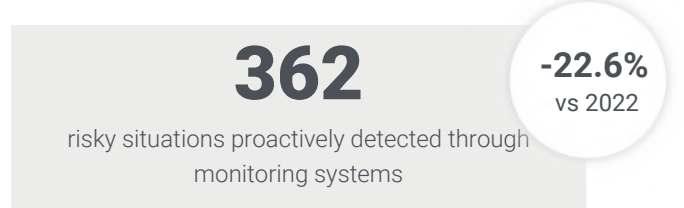
We have set ourselves the goal of incorporating AI technology and the experience obtained in online gaming into in-person gaming.

Self-exclusion reinforcement

Creating a Responsible Gaming culture largely depends on empowering our customers. In line with this commitment, we want each customer to be able to adapt their circumstances to the game experience. In 2023, for example 3,163 players set betting limits. In addition, we manage a self-exclusion programme that allows customers to opt out of gaming whenever they consider it appropriate.

+17.2%
vs 2022

41,615
self-exclusions (online gaming)

3,163
gamblers set betting limits in 2023

+15.5%
vs 2022
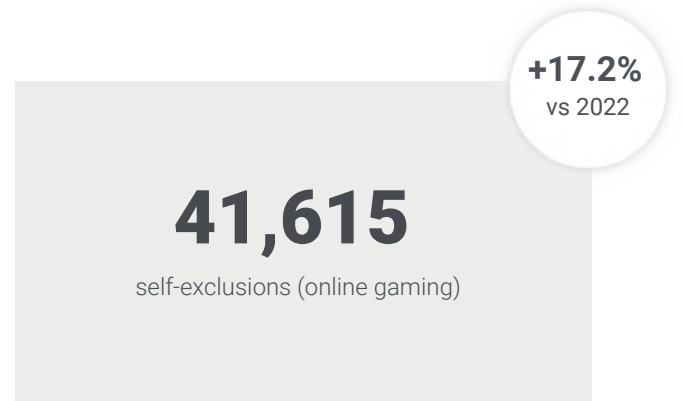
Social awareness

We must continue to train our customers, through awareness campaigns, to help them make safe and responsible decisions.

In this regard, we are applying the global communication plan **"At CIRSA We Are Responsible Gaming"** in all our gaming halls, which we adapt to the needs of our customers and employees. As part of this communication plan, we display awareness messages regarding Responsible Gaming throughout our operations. For example, in our gaming halls, we have items that to advise our customers to only bet the amount of money can afford, while, in online play, we notify them by text message or email.

In online gaming, we provide our customers with the information they need to feel safe when they interact with us. We also offer tools parents can use to prevent children from accessing online gaming, as information about web page self-exclusion.

We also have a dedicated Responsible Gaming call centre that provides guidance to our customers who need help or want to ask for it.

OUR HELP FOR PROBLEM GAMBLERS

Collaboration in therapeutic treatment

A significant proportion of our Responsible Gaming efforts are dedicated to collaborating between different CIRSA professionals and researchers to deal with potential gambling-related harm. This is vitally important when customers develop a difficult relationship with gambling.

We recognise that gambling addiction improves significantly with psychological treatment.

New in 2023, we signed a collaboration agreement with **FEJAR** (Federación Española de Jugadores de Azar Rehabilitados [Spanish Federation of Rehabilitated Gamblers]) whose common interest is the promotion of active Responsible Gaming policies and principles. This agreement allows us, among other things, to support and participate in Responsible Gaming gestures, as well as to publish the toll-free gambling problem hotline in our Responsible Gaming leaflets.

In addition, since 2016, we have been working closely with **ACENCAS** (Asociación Centro Catalán de Adicciones Sociales [Catalan Centre for Social Addictions Association]), devoted not only to helping those who suffer from gambling-related harm, but also their inner circle.

Grants to treat compulsive gambling

Finally, we highlight our agreement with **C.A.T Barcelona**, an organisation with which we have been collaborating since 2017 with the aim of enhancing the study and development of **therapeutic programmes for pathological or compulsive gambling**. We also subsidise the treatment for people who require it and meet the requirements established in our collaboration.

Environment

We ensure environmental best practices
to effectively contribute to mitigating climate change

Goal and strategy

According to the World Health Organisation, climate change is one of the leading threats to humanity and puts at risk the progress made over the last 50 years in global development, health and poverty reduction.

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

Similarly, **we ensure the integration of responsible environmental judgement into our internal processes**, such as decision making, risk analysis in internal operations and investment. This strategy is set out in our **Environmental Policy**, which outlines the company's goals to ensure we act in an environmentally friendly manner.

In 2023 we have recovered the pre-pandemic level of economic activity. This year, without the limitations arising from COVID-19, we have expanded our offer by adding new gaming halls in accordance with our expansion policy, keeping our business and environmental strategy intact. **We want our gaming halls to truly reduce their footprint.** In this regard, we have continued to develop our strategic project called **Green Hall** to ensure that all of our gaming halls apply environmental best practices, with four areas of interest. Likewise, during 2023 we have launched the **Green Site** project consisting of the implementation of the sustainability model applied to our gaming halls and our corporate offices. Both projects focus on **four areas of interest**:
:

Energy efficiency and water use	Renewable energy	Waste management	New centres and renovations that are completely environmentally friendly

Green Hall consists of a manual validated by SGS and whose application in our establishments ensures that any action or work be carried out with sustainability criteria in mind. Four levels of certification are identified depending on the scope of the action taken.

All of our facilities use the latest technologies to ensure rational water use and avoid waste, making our consumption more efficient. In terms of energy consumption, we want to make sure that all the facilities apply energy efficiency projects, especially savings in electricity consumption. It is also important for us to encourage the use of renewable energy, with a special interest in the installation of solar panels in our facilities located in sunny geographical places, as is the case for most of them. At the same time, we are committed to continuing to invest in IoT equipment to digitise our thermal comfort and energy management system to make it more efficient.

In addition, when it comes to waste management, we apply a robust waste management system in our gaming halls. We aim to prevent contamination and help reduce the environmental footprint of our operations. In this regard, we apply strict measures to optimise our waste generation in order to recycle it as much as possible and thus reduce waste.

Due to the characteristics of the activity, impact on biodiversity is not an aspect considered relevant in our environmental strategy, as these are gaming services and are located in urban environments not close to areas of special environmental protection.

With regard to noise and light pollution, CIRSA complies with the regulations applicable in all its locations to ensure that the possible impacts arising from the carrying out of its activity are minimised.

Given the nature of CIRSA's activity, coverage for environmental contingencies is included in the corporate civil liability policy, with coverage for environmental damage being €40 million.

During the year 2023, the resources allocated to the prevention of environmental risks have amounted to €2.8 million between air conditioning equipment, IoT, photovoltaic projects, etc. and more than €1.5 million in new construction and improvements under Green Hall sustainability criteria. In 2022, more than €2.8 million was allocated.

The environmental strategy is managed and supervised by senior management and is executed through the **Environmental Sustainability Committee**, a specific area of responsibility that operates in the markets where we have a presence.

```
Executive Chairman
        |
  ESG Director
        |
Environmental Sustainability Director
        |
   ┌────────────┬────────────────────┬──────────────────┬──────────────────┐
Technical    Systems and        * FM Business      * FM Corporate
Direction    Control Management    Management         Management
```

A responsible employee in each country in which we operate

*FM: Facility Management

Actions and 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, electricity consumption corresponds to 77.6% of the Company's total carbon footprint. Our global energy consumption in 2023 amounts to 199,292,161 kWh, while the energy consumption per gaming hall and per square metre is 468,923 and 560 kWh, respectively.

In this context, each site has applied different energy efficiency projects, such as switching from HVAC equipment to more efficient systems, remote heating management and, periodic energy monitoring, application of photovoltaic self-consumption. As for measures against light pollution, the switch from conventional lighting to LED technology has been made.

-18.3%

electricity consumption per m^2 of business surface area between 2015-2023

0.56

energy intensity MWh/m^2

In recent years, digitalisation has played a major role in energy efficiency. That's why we continue to upgrade and design custom equipment to monitor and manage our energy consumption remotely. In this regard, we are continuing with the IoT project, which involves more than 144 gaming halls from all countries. At the end of 2023 we have the following IoT tools in place:
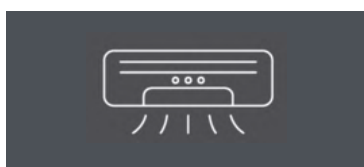
51

remote air conditioning management systems

230

remote energy management systems

136

remote air quality management systems

The renovation of our HVAC systems continues with variable refrigerant flow systems, which allow significant savings in energy consumption. We continue to install energy recovery and remote management of these systems through trained technical personnel to always seek maximum efficiency.

Regarding water consumption, our impact is not considered significant. Our global water consumption in 2023 was 546,334 m^3. On average, our gaming halls use 1,285 m^3, while our consumption per square metre is 1.54 m^3. In 2023, data related to water consumption has been obtained with greater precision, thanks to the application of artificial intelligence tools.

RENEWABLE ENERGY

Regarding specific electricity consumption (163,347,753 kWh) in 2023, we acquired 103,089,676 kWh in the retail electricity market from renewable energy sources, in addition to producing and consuming 961,909 kWh from our photovoltaic systems, which means an increase compared to the previous year of **+4.3%** of renewable energy and 64% of the total consumed, slightly lower than the previous year due to the incorporation of Morocco and limitations in energy contracts with GO (Guarantee of renewable origin).

We maintain our goal that by 2030 virtually all of the energy acquired will come from **renewable sources**.

In addition to the acquisition of renewable energy, we are increasing our energy production for self-consumption through photovoltaic systems. In this regard, in 2023, 7 self-consumption projects have been developed, with a total of 323 kWp installed and an increase in installed power compared to 2022 of 87%.

We will expand our medium-term self-consumption capacity in all countries in which we operate.

104,051MWh of renewable energy consumption in 2023 in all countries

+4.3% vs 2022

90% renewable energy with the possibility of contracting GO

+6.0% vs 2022

Mexico**	38%
Dom. Rep.*	—%
Spain	95%
Costa Rica*	—%
Panama	81%
Colombia	95%
Peru**	17%
Morocco*	—%
Italy	96%

*Countries without the possibility of contracting with GO

** Countries with limited possibility of contracting with GO
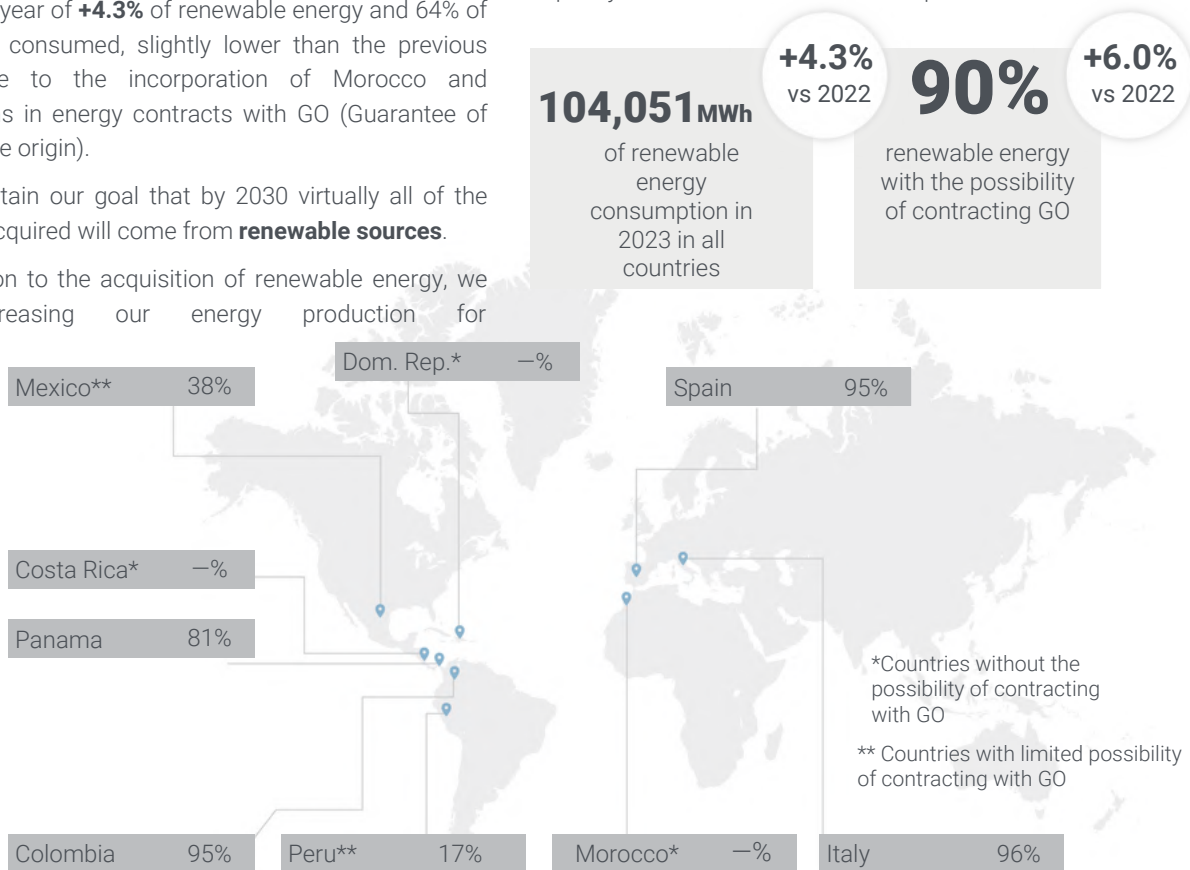
Our goal is to reach 95% renewable energy consumption by 2030

GREENHOUSE GAS EMISSIONS

In 2023 we have recovered the pre-pandemic level of economic activity. This year, without the limitations arising from COVID-19, we have expanded our offer by adding new gaming halls in accordance with our expansion policy, keeping our business and environmental strategy intact. Between 2015 and 2023, due to our efforts in reducing energy consumption and the use of renewable energy, we have been able to significantly reduce our **scope 2** location-based carbon footprint by 32%.

As part of our fundamental commitment to the decarbonisation of our operations, **we aim to improve our environmental impact also by introducing a policy** **that encourages the use of hybrid and electric vehicles** and, therefore, further reduces **scope 1** greenhouse gas emissions, generated, in our case, largely by the fuel consumption of our vehicle fleet.

-32 % carbon footprint reduction of scope 2 in tCO_2 e per m^2

CO2
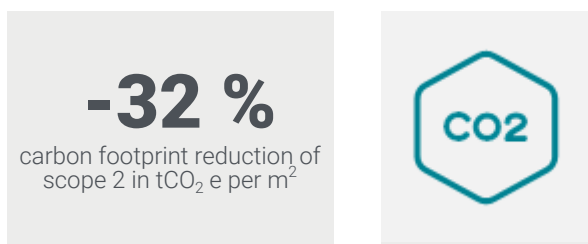
In parallel, in 2023, **45 charging points have been installed** in Spain that already allow our staff, customers and fleet to charge their vehicles at our facilities. With this, we pave the way for reducing of our **Scope 3** indirect greenhouse gas emissions.

In Italy we have doubled the weight of our fleet of sustainable vehicles. As a Group committed to a sustainable, fair and climate-safe future, we want to advance all of our **commitments to mitigate climate change**.

We remain committed to reducing our carbon footprint (market-based) by 65% through 2030 compared to our 2022 emissions, including our emissions per gaming hall and per square metre.

We have reviewed our forecasts and want to meet the challenge of achieving net-zero emissions by 2035 following the Paris Agreement guidelines.

Our carbon footprint in 2023:

tCO2e of GHG emissions – direct and indirect (market-based)	32,575
Greenhouse gas emissions (Scope 1)[1] tCO2e	12,770
Greenhouse gas emissions (Scope 2 - market-based)[2] tCO2e	19,805
Greenhouse gas emissions (Scope 2 - location-based)[2] tCO2e	44,341
Greenhouse gas emissions per gaming hall (tCO2e)	76.6
Greenhouse gas emissions per m2 (tCO2e)	0.09

Intensity (side label)

[1] Scope 1 greenhouse gas (GHG) emissions have been calculated using the Greenhouse Gases Protocol Corporate Accounting and Reporting Standard . Scope 1 includes the following fuels: natural gas, propane, butane, liquefied petroleum gas, petrol and diesel. Consumer data has been converted to GHG emissions using the emissions factors of MITECO (Ministerio para la Transición Ecológica y el Reto Demográfico [Spanish Ministry for the Ecological Transition and the Demographic Challenge]) .
[2] Location-based greenhouse gas emissions of Scope 2 have been calculated based on emissions factors of IRENA. Market-based greenhouse gas emissions have been calculated from the emission factors associated with the market instruments that CIRSA uses to supply electricity.

We include in this report the measurement of **Scope 3** in the company travel variable (journeys taken by our employees both by plane and by train).

Greenhouse gas emissions - business trips (tCO2e)	907

We have set ourselves a goal for the year 2024, and within the SBTI project, to expand our monitoring of Scope 3 emissions.

CIRCULAR ECONOMY AND WASTE MANAGEMENT

Waste management

We endeavour to strictly comply with current environmental legislation in all countries where we operate by adopting measures for continuous improvement and setting periodic objectives that are verified through audits. Data from 2023 shows that we have generated **896 metric tons of waste**, of which 528 metric tons come from our B2B manufacturing business processes and 368 metric tons from simple gaming activity.

By their nature, our industrial activities do not generate a significant amount of hazardous waste. The identification phase of the types of waste classified according to the **European Waste List (LER)** has begun. It is estimated that the amount of hazardous waste generated is less than 20 metric tons per year in all of our countries.

In the industrial process, the management of waste from electrical and electronic equipment (WEEE) is carried out with the company Ecoasimelec, which is responsible for the selective collection and management of the waste we generate.

To reduce waste generation and encourage recycling whenever possible, we have implemented an effective waste management system tailored to both the manufacturing and gaming activities. As an example, we include an identification seal on CIRSA slot machines to allow for subsequent recycling. This seal includes information on all components used (printed circuits, screens, plastics, electrical wiring, glass, etc.) to ensure proper disassembly and separation.

In addition, we ensure that customers and our staff recycle at our sites and make proper use of water while all items that can no longer be recycled are managed appropriately.

ecoasimelec)

+91%

of our corporate and manufacturing waste is recycled

Consumption of raw materials

Due to the characteristics of the activity, the use of raw materials is not significant. Only for the manufacture of slots machines for the Spanish market are raw materials of a certain volume used. It should be noted that the company UNIDESA, their manufacturer, has **ISO9001 certification**.

The **consumption of raw materials** for the **manufacture of slot machines** for this year 2023 has been:

| 2023 → | plastic | **239** | wood | **820** | lock | **471** | Units: in Tn |
| 2022 | | 219 | | 633 | | 413 | |

On the other hand, at CIRSA we are aware of the environmental impact of excessive use of **office paper**. We have implemented various initiatives to reduce its use, promoting the use of digital technologies for document management (electronic documents and digital signatures) and responsible printing practices by promoting double-sided printing. In 2023 we have reduced consumption by 30% in Spain.

| 2023 → | paper | **16.5** | Units: in Tn |
| 2022 | | 23.5 | |

Food waste

Although in our industry catering is not the main activity, we carry out measures to avoid **food waste**. Good and effective waste management involves acting on the key processes of the operational chain. As a general rule:

The few expired inputs that may arise in the operation are generally perishable.	The losses that occur are mostly accidental (overcooking, changes requested by the customer, product falling.....)

In both cases they are not usable foods due to health regulations.

The main processes in the operational chain are described below:

- Request for F&B (food and beverage) orders by digitising the purchasing process through iCloud applications (Micros, G-Stock).
- Storing food efficiently by carrying out external safety audits.
- Control of storage and cooking temperatures by carrying out external safety audits.

- Maintaining effective inventories and carrying them out on a monthly basis.
- Monthly income projection working with production forecasts.
- Application of a balanced offer.
- Report and control of accidental losses.

CLIMATE CHANGE

As we mentioned earlier, although our company does not have a significant impact on the environment, we recognise the important role that the private sector plays in supporting the mitigation of climate change, as well as the urgency of acting against it. We are committed to reducing our environmental footprint and improving energy and process efficiency in all countries where we operate.

In this aspect, in addition to the strategic project called **Green Hall**, a set or rules that guarantees that any action is carried out under sustainability criteria to adapt to the possible consequences of climate change, during 2023 we have launched the **Green Site** project consisting of the implementation of the sustainability applied in the gaming halls to our corporate offices.

We encourage the **use of renewable energy**, the installation of **solar panels**, and investment in **IoT** equipment to digitise our energy management system and make it more efficient. We use the latest technologies throughout our facilities in order to ensure

the rational use of water. Finally, we are applying a robust waste management system.

We understand that, by combining all of these measures, we can quickly achieve our greenhouse gas reduction targets that we have set for 2030 and meet our target of NET ZERO by 2035. The environmental strategy is deployed through a specific department that operates in the markets where we have a presence.

In order to add strength to our NET ZERO strategy for 2035, we have begun the process of analysis and collecting information to join the **SBTi (Science Based Targets Initiative), expected to materialise in 2024**. This signifies the commitment that the company will take on with the definition of a plan of objectives to reduce greenhouse gas emissions based on the science necessary to meet the goals of the Paris Agreement (limiting global warming to 1.5ºC above pre-industrial levels).

Social

We endeavour to retain, develop and attract new talent to the Company

Goal and strategy

We are committed to providing the markets with the best services. To achieve this, we strive to ensure that all people who are part of the Group share this commitment.

Our team is essential and we must ensure that it is the best prepared by offering them an optimal work environment.

We actively work to meet the needs of our employees, from onboarding support to ongoing advice, which is adapted case by case, focusing on personalised development plans.

Likewise, we focus as a priority on the well-being of our employees, this being the pillar that supports CIRSA. In addition, we have carried out an exhaustive study at a global level and have identified the main risks at the individual level in the group, such as potential loss of talent, loss of senior leadership profiles and risks to the wellbeing of our employees. With the objective of mitigating or eliminating the aforementioned risks, a policy has been developed under which different plans and programmes are derived:

- **Creation of 360° wellness and health plans** in all countries where CIRSA has a presence.
- **Development of training and education plans for leaders and managers**, to continue promoting internal promotions in the Group.
- **Expansion of the social benefits programme**, as well as improvement of existing flexible compensation plans.
- **Collaboration with new training centres**, to continue expanding the training catalogue.

The 5 pillars on which CIRSA's people policy is based:

1. ETHICS AND EQUAL OPPORTUNITIES

We ensure that all our processes, from hiring to compensation and promotions, are executed in an ethical, inclusive, fair manner and from the point of view of Diversity, Equality and Inclusion.

2. SOCIAL DIALOGUE AND JOB SECURITY

We ensure freedom of association and social dialogue, as well as job security, by prioritising permanent rather than short-term temporary contracts.

3. HEALTH, SAFETY AND WORKING CONDITIONS

We offer a safe work environment, carrying out safety studies in all positions and centres.

4. PROFESSIONAL DEVELOPMENT

We have comprehensive training programmes that are customised, case by case. In addition, we prioritise internal promotion, whenever possible.

5. WELL-BEING

The wellbeing of our employees is one of our top priorities. That is why we offer the best work environment to achieve balance between private life and work life.

Our team in numbers

In 2023, our team consists of **13,861 people**, of whom 79.2% work for our gaming halls directly or indirectly. The number of employees represents an increase of 4% compared to fiscal year 2022. Of this increase, more than 50% are people between 30 and 50 years old. Although **13,861** may seem like a large number, at CIRSA we continue to act as a local company, which explains why the majority of our employees come from the communities where we are present. Specifically, **95% of our employees are local**, that is, national employees of the country in which they provide the service.

Employees by professional category

	2022	2023
Management	769	686
Support staff	1,703	1,745
Marketing staff	381	446
Indirect gaming halls staff	3,203	3,424
Direct gaming halls staff	7,282	7,560
TOTAL	13,338	13,861

49% 51%   49% 51%

Employees by age

	2022	2023
< 30	3,339	3,369
30 - 50	7,768	8,119
> 50	2,231	2,373
TOTAL	13,338	13,861

Employees by country and gender

2022   2023

Country	2022	2023
Costa Rica	334	332
Italy	357	499
Morocco	522	610
Peru	797	877
Dominican Republic	818	832
Panama	1,247	1,278
Mexico	2,057	2,140
Colombia	2,772	2,777
Spain	4,434	4,516
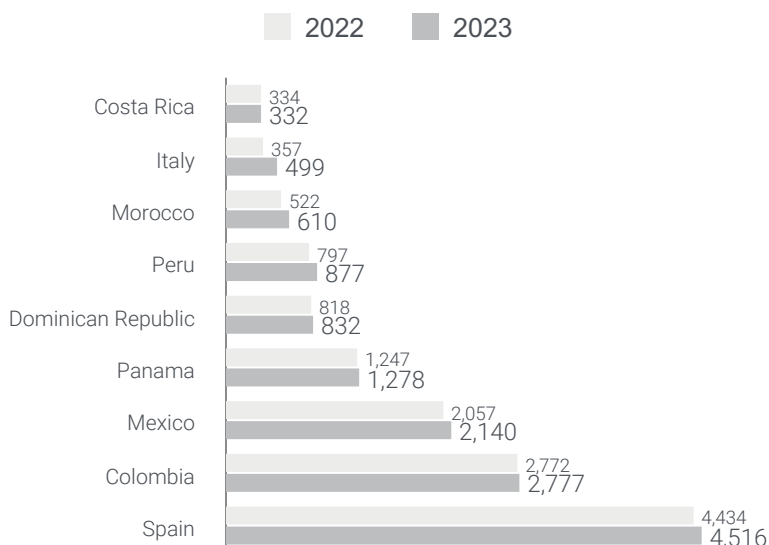
	2022		2023	
	♀	♂	♀	♂
	43%	57%	44%	56%
	29%	71%	26%	74%
	28%	72%	31%	69%
	52%	48%	55%	45%
	61%	39%	64%	36%
	60%	40%	60%	40%
	48%	52%	50%	50%
	61%	39%	59%	41%
	39%	61%	40%	60%

CIRSA

Actions and results

Our primary commitment is to create safe, healthy, diverse, balanced and inclusive workspaces. At CIRSA we offer our staff **an optimal place to work**. We achieve this through opportunities based on our **diversity, equality and inclusion** policy, with personalised training programmes, guaranteeing the **well-being of our employees**, offering the best safety conditions at work, as well as competitive compensation packages.

In addition, our **global** team consists of **49% women and 51% men**, reaching **56% of women in Latin America**.

ETHICS AND EQUAL OPPORTUNITIES

Ethical standards in our personnel management processes

We are fully committed to ensuring diversity and inclusion in all of our processes for managing people, from start to finish. We also have a zero tolerance policy for any discrimination. All employees involved in personnel management, especially those in the People and Talent Department, have been duly trained in this matter.

In the selection processes, candidates are evaluated solely based on their fit for the position, to do so:

- **Segregation by sex is eliminated** through the writing of job advertisements that favour the inclusion of all the people to whom they may be directed. Additionally, the following clause is included in all advertisements:

   "CIRSA is a company committed to Equal Opportunities. Therefore, we are responsible for ensuring that our selection processes are carried out under equal conditions and without discrimination based on birth, age, race, sex, sexual orientation, religion, marital status, opinion or any other physical, personal or social condition protected by law".

- **The incorporation of the minority sex is prioritised** in departments where there is a majority sex compared to 2 candidates with the same training and experiences.

- We have joined the **Empowering Women's Talent programme** led by the People and Talent Department to continue promoting the development of women in management positions.

- We offer **training in Inclusive Communication**.

- We are working on creating a **Diversity, Equity and Inclusion Committee** to detect opportunities for improvement and define global action plans.

We ensure that all of our processes, from employment and recruitment requirements, to pay and promotions, are applied in an ethical, inclusive and fair way, while always upholding values of Diversity, Equality and Inclusion. That is why, through our equality plans, we are committed to guaranteeing the diversity and integration of all our personnel management processes, to ensure equal treatment and opportunity.

Organization of working time

At CIRSA, one of our main commitments is that all our employees should enjoy working conditions that are protected within current labour regulations to provide coverage for a better balance of family life throughout our environment.

Based on these regulations, the organisation of working time in each of the companies that make up the Group is regulated by the corresponding work schedules, which establish the daily work hours to be carried out in each work centre, in accordance with the annual or weekly hours established in the applicable local laws. In this regard, in the same work schedules, local and national holidays are established, as well as flexibility in the working day regarding entry and exit at each work centre, whenever applicable.

In the same way, in business centres work shifts are established with the conditions established in each local law. These work shifts are rotating, and in them the work days that must be determined are carried out by each employee on a weekly/monthly basis.

To make them formal and public, they are negotiated and signed, if they exist, with the representatives of the employees. Once signed, they are published on the boards installed for this purpose in each work centre, so that they can be viewed.

Regarding the management of working time, through the use of overtime, this is limited to what is allowed by the respective local legislation of each country and cannot exceed an annual maximum per employee. Payment for overtime, in accordance with the provisions of local legislation, may be financial or via time off. The use of overtime is limited to operational incidents and/or needs, especially in business areas.

Likewise, in the management of work time, all special situations are also taken into consideration, such as caring for children or sick relatives.

Diversity, equality and inclusion

Through our **Diversity, Equality and Inclusion policy**, commitments and lines of action are established to position the management of diversity and inclusion as key elements of the Company's global strategy. At CIRSA we have a Compliance environment that looks after the interests of all our employees. In this environment there are various tools made available to all of them, so that, if necessary, they can inform the company of any fact related to an alleged act of

harassment or discrimination in the workplace of any kind. In this regard, once the protocol is activated, the reported fact is investigated by opening an information file in which the alleged act of harassment or discrimination is investigated. Based on the results of this investigation, it will be determined whether the disciplinary regime established in local legislation can be applied.

In Spain we have successfully negotiated and registered 30 Equality Plans, which include specific actions in the areas of communication, training, development, safety and health at work, as well as protocols against sexual and gender-based harassment.

Our commitment is to create equitable and inclusive work spaces, where there are equality policies that affect both men and women equally. To this end, training programmes have been created within the equality plans, **the objective being to achieve parity in positions of responsibility**.

In addition, we have launched the **Aflorar Plan** in Spain, with the aim of guiding employees and their families to manage the procedures for obtaining the **disability certificate**.

Regarding integration and accessibility measures for people with disabilities, CIRSA guarantees that all people will have the same opportunities, with an inclusive approach in our practices for recruitment, selection, promotion and retention of diverse talent. In addition, we ensure maximum compliance with local and international laws to defend the rights of people with disabilities and their social inclusion. It should be noted that in 2023, conventions and agreements have been established with various associations at a global level, to facilitate access to a job by people with disabilities, thereby covering the requirements and needs established in Spain by the General Disability Law in this regard.

All our work centres have a municipal opening licence, including the regulatory guideline of compliance with universal accessibility for people with disabilities, eliminating architectural barriers from access, along the interior route and including and providing adapted bathrooms.

Consequently, in this fiscal year, the number of employees with disabilities in the Group has increased by 2% compared to 2022, with the total number being 125 employees.

Employees by country and gender

	2022			2023		
	Women	Men	Total	Women	Men	Total
Spain	1,747	2,687	4,434	1,790	2,726	4,516
Colombia	1,682	1,090	2,772	1,638	1,139	2,777
Costa Rica	142	192	334	146	186	332
Panama	745	502	1,247	761	517	1,278
Dominican Republic	503	315	818	534	298	832
Mexico	997	1,060	2,057	1,064	1,076	2,140
Peru	417	380	797	480	397	877
Morocco	148	374	522	187	423	610
Italy	103	254	357	129	370	499
TOTAL	6,484	6,854	13,338	6,729	7,132	13,861
	49%	51%	100%	49%	51%	100%

Note: The increase in personnel derived from M&A (basically in Italy), full activity and post-covid recovery without restrictions (Morocco and Peru)

Regarding **gender integration,** in 2023, a total of **182 women have held a management position in gaming halls**, representing **50% of managers**.

In response to our responsibility for the **diversity and the integration** of our multicultural teams, CIRSA has developed a robust set of measures to ensure that all people belong and are included with equal opportunities.

At CIRSA we have employees of 80 different nationalities.

This is done by achieving **gender parity** in our positions, ensuring gender integration in the company and defining a glossary of terms in matters of equality.

We also drive positive actions to be a fair company that promotes equal opportunity through our various internal policies of Human Resources, Human Rights and Corporate Governance.

Working conditions and social benefits

At CIRSA, not only are we aware of the importance of developing our people, we are also committed to providing a competitive pay package for every employee at all levels. In this regard, we offer a wide range of social benefits to our employees, with the possibility of using discounts on the acquisition of products and/or services. Additionally, we offer scholarships to promote the professional development of employees of the Group, as well as a Flexible Remuneration Plan that includes health insurance, restaurant vouchers, day-care allowance and transport pass card.

Part of our team's annual variable remuneration is directly linked to compliance with ESG objectives, establishing general objectives for the good performance of the main KPIs.

Number of new hires by gender, age and professional category

| | 2022 | | | | | | 2023 | | | | | |
| | Women | | | Men | | | Women | | | Men | | |
	< 30	30 - 50	> 50	< 30	30 - 50	> 50	< 30	30 - 50	> 50	< 30	30 - 50	> 50
Management	0	16	1	2	28	13	1	32	0	1	37	14
Support staff	81	83	25	65	85	61	85	101	5	81	110	13
Marketing staff	88	23	11	64	15	38	44	24	4	15	37	4
Indirect gaming halls staff	139	239	65	242	307	83	58	188	28	178	314	24
Direct gaming halls staff	1,565	960	81	1,153	845	70	1,407	1,316	129	1,134	937	118
TOTAL	1,873	1,321	183	1,526	1,280	265	1,595	1,661	166	1,409	1,435	173
	3,377			3,071			3,422			3,017		

Number of staff terminations by gender, age and professional category

	2022						2023					
	Women			Men			Women			Men		
	< 30	30 - 50	> 50	< 30	30 - 50	> 50	< 30	30 - 50	> 50	< 30	30 - 50	> 50
Management	1	7	2	0	16	14	0	9	2	1	15	12
Support staff	13	25	7	11	24	13	10	18	10	12	28	8
Marketing staff	4	7	0	2	7	12	4	10	0	1	10	0
Indirect gaming halls staff	25	50	7	55	105	19	11	45	7	33	73	11
Direct gaming halls staff	203	211	25	150	140	45	184	179	17	169	142	16
TOTAL	246	300	41	218	292	103	209	261	36	216	268	47
	587			613			506			531		

Average salaries by gender, age and professional category

Currency: in euros	2022						2023					
	Women			Men			Women			Men		
	< 30	30 - 50	> 50	< 30	30 - 50	> 50	< 30	30 - 50	> 50	< 30	30 - 50	> 50
Management (*)	16,057	31,606	40,961	28,939	51,154	71,632	15,753	38,085	43,929	18,457	57,221	78,074
Support staff	14,695	22,991	30,078	19,826	29,550	41,146	15,123	23,845	32,131	23,373	30,825	40,250
Marketing staff	8,193	14,977	19,948	14,316	30,493	42,111	8,459	17,679	30,809	15,929	38,566	52,685
Indirect gaming halls staff	6,922	10,077	14,479	7,320	11,536	20,095	8,025	10,931	16,478	7,933	12,039	20,866
Direct gaming halls staff	6,508	9,952	14,601	7,219	13,402	21,722	7,255	10,934	16,041	8,652	16,029	24,151
TOTAL	7,113	12,773	20,297	8,679	18,214	30,363	7,873	13,840	21,810	10,096	20,355	33,409

To calculate the average remuneration, the gross annual remuneration + bonuses and variables (all items) have been considered.
(*) The Management category does not include the remuneration of members of senior management

Salary Gap

EMEA Gap +24%

LATAM Gap +23%

+27% +21% +1% +29% +39% +20% +15% +14% +22%

	2023			
	Currency	Women	Men	VAbs	%
Spain	EURO	24,638	33,740	9,102	27.0%
Italy	EURO	30,201	38,261	8,060	21.1%
Morocco	MAD	143,469	144,465	996	0.7%
Mexico	MXN	165,346	234,573	69,227	29.5%
Dominant Rep.	PDO	373,699	615,558	241,859	39.3%
Costa Rica	k CRC	6,429	8,083	1,654	20.5%
Panama	USD	13,363	15,746	2,383	15.1%
Colombia	k COP	30,891	36,155	5,264	14.6%
Peru	PEN	28,550	36,728	8,178	22.3%

The wage gap is conditioned by different geographic areas as well as different job categories. Our average wage gap between all the countries in which we have a presence is **21.1%**. We recognise the need to reduce it in the coming years and we are committed to doing so.

SOCIAL DIALOGUE AND JOB SECURITY

Freedom of association and trade union representation

Another of the fundamental issues for us is to guarantee freedom of union and association to all our employees, recognising their right to collective bargaining, in accordance with the legislation in force in each region. In this regard, in some of the countries where we operate, there are Legal Representatives of Workers who look after the latter's interests.

As a Group, we hold regular meetings with all of them to ensure good communication and listen to any suggestions. Currently, in Spain there are more than 50 legal representation bodies for employees that freely exercise the right to freedom of association and representation.

At these meetings, agreements are reached related to salary issues, flexible working, risk prevention, complements and services, equality plans, resource management, use of facilities, etc.

In 2022 we begin negotiations with **Uni Global Union**. In 2023, we are finalising an international agreement that will allow us to strengthen our dialogue and commitment in matters of Human Rights, union and environmental issues, as well as providing coverage for social dialogue with employees in the rest of the countries where the Group operates.

Quality of employment

At CIRSA we prioritise employment contracts of indefinite duration, resulting in job stability and quality for all local communities in which we operate. Job security is also fundamental for CIRSA.

96%
of our employees are covered by collective agreements

95%
permanent contracts

Number of employees covered by collective agreements by country

	2022			2023		
	Employees	% of employees covered	Employees covered	Employees	% of employees covered	Employees covered
Spain	4,434	100%	4,434	4,516	100%	4,516
Colombia	2,772	100%	2,772	2,777	100%	2,777
Costa Rica	334	100%	334	332	100%	332
Panama	1,247	100%	1,247	1,278	100%	1,278
Dominican Republic	818	0	0	832	0	0
Mexico	2,057	74%	1,515	2,140	78%	1,669
Peru	797	0	0	877	0	0
Morocco	522	0	0	610	0	0
Italy	357	100%	357	499	100%	499
% of employees covered by collective agreements	13,338	80%	10,659	13,861	80%	11,071
Total collective agreements	11,201	95%	10,659	11,542	96%	11,071

In those places where specific legislation exists, our employees are subject to the applicable collective agreements or conventions. In other countries, the corresponding state regulations apply. In both cases, issues related to occupational health and safety are included.

Average number of employees broken down by contract type and country

	2022				2023			
	Indefinite		Temporary		Indefinite		Temporary	
	Full time	Part time	Full time	Part time	Full time	Part time	Full time	Part time
Spain	3,889	323	188	34	3,799	433	283	46
Colombia	2,752	0	20	0	2,759	0	30	0
Costa Rica	333	0	1	0	330	0	3	0
Panama	1,233	0	14	0	1,249	0	10	0
Dominican Republic	816	0	2	0	822	0	4	0
Mexico	2,056	0	1	0	2,223	0	2	0
Peru	777	3	17	0	828	0	22	0
Morocco	225	0	297	0	267	0	308	0
Italy	337	0	20	0	330	28	21	5
TOTAL	12,418	326	560	34	12,607	461	683	51
	12,744		594		13,068		734	

At CIRSA we prioritise indefinite and full-time working relationships whenever possible. Due to the nature of our activity, there are no substantial changes in the workforce during the year.

Average number of employees broken down by type of contract, age and sex

	2022						2023					
	< 30		30 - 50		> 50		< 30		30 - 50		> 50	
	Women	Men	Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
Indefinite	1,815	1,345	3,707	3,729	708	1,440	1,819	1,355	3,838	3,821	747	1,488
Full time	1,815	1,342	3,576	3,537	708	1,440	1,785	1,335	3,594	3,743	696	1,454
Part time	0	3	131	192	0	0	34	20	244	78	51	34
Temporary	79	100	144	188	31	52	140	133	164	234	27	36
Full time	79	100	123	175	31	52	130	124	144	229	22	35
Part time	0	0	21	13	0	0	10	9	20	5	5	1
TOTAL	1,894	1,445	3,851	3,917	739	1,492	1,959	1,488	4,002	4,055	774	1,524
	3,339		7,768		2,231		3,447		8,057		2,298	

Average number of employees broken down by type of contract and job category

	2022					2023				
	Management	Support staff	Marketing staff	Indirect gaming halls staff	Direct gaming halls staff	Management	Support staff	Marketing staff	Indirect gaming halls staff	Direct gaming halls staff
Indefinite	768	1,661	378	3,130	6,807	664	1,692	403	3,290	7,019
Full time	768	1,661	378	2,998	6,613	654	1,620	397	3,226	6,709
Part time	0	0	0	132	194	10	72	6	64	310
Temporary	1	42	3	73	475	12	53	8	100	561
Full time	1	42	3	73	441	11	51	8	96	517
Part time	0	0	0	0	34	1	2	0	4	44
TOTAL	769	1,703	381	3,203	7,282	676	1,745	411	3,390	7,580

HEALTH, SAFETY AND WORKING CONDITIONS

Occupational health and safety

At CIRSA we are very committed to health and safety at work, as established by our Occupational Risk Prevention Policy, this being a key priority for the management team in all the countries where we operate.

Specific training in occupational health and safety for different positions is essential in the Group. Additionally, a programme to prevent musculoskeletal disorders is carried out for UNIDESA employees (slot machines manufacturers).

Some of the results of our efforts to preserve health and safety at work can be seen by the very small number of workplace accidents that have occurred at CIRSA. Specifically, in 2023, there have been 327 work accidents and there have been 0 work-related illnesses.

Working conditions

The implementation of appropriate safety policies and procedures creates a work environment in which risks are minimised, promoting the physical and emotional integrity of employees. The presence of preventive measures and clear protocols not only complies with government regulations, but also fosters a culture of responsibility and awareness in the workplace. A safe work environment not only involves the management of obvious risks, such as the correct handling of equipment or the prevention of accidents, but also the proactive identification and addressing of potential hazards, constant training in safety and regular evaluation of working conditions contributes to creating an environment where employees feel supported and confident in carrying out their tasks. In conclusion, prioritising safety in the workplace is not only a legal obligation, but also a commitment to the well-being and health of employees. A safe work environment not only protects employees from injuries and accidents, but also strengthens team cohesion and efficiency, contributing to CIRSA's sustainable success.

Accident rate

	2022			2023		
	Total	Women	Men	Total	Women	Men
Accidents*	283	183	100	327	202	125
Frequency index [1]	11.29	14.94	7.69	8.07	10.24	6.02
Severity index [2]	0.19	0.23	0.15	0.17	0.19	0.15
Work-related illnesses	0	0	0	0	0	0

* Year 2023 full post-covid activity
[1] The frequency index has been obtained by dividing the number of accidents with medical
  leave (does not include accidents in itinere) by the number of hours worked multiplied by 1,000,000.
[2] The severity index has been calculated by dividing the number of days lost due to accidents with medical
  leave (does not include accidents in itinere) by the number of hours worked multiplied by 1,000.

Absenteeism from work

Efficient management of absenteeism from work is crucial to guarantee operational continuity and optimal performance of CIRSA. Absenteeism, whether for health, personal or work-related reasons, can have a significant impact on employee productivity and morale. Implementing proactive measures to reduce absenteeism is essential. Offering wellness programmes that address both physical and mental health, providing flexibility in work schedules to adapt to individual needs, and promoting a culture of support and recognition are effective strategies.

Analysing the ratios that currently exist at CIRSA, a global absenteeism rate of 3.1% has been detected, which is equivalent to 1,248,910 hours* (in 2022 were 1,218,328 hours). This index includes absenteeism due to sickness and accidents.

* Estimated 8 hours per lost work day

	2022	2023
Spain	5.8%	5.8%
Colombia	2.5%	2.5%
Costa Rica	1.5%	2.5%
Panama	0.3%	1.2%
Dominican Republic	1.1%	1.1%
Mexico	2.0%	1.7%
Peru	1.7%	1.6%
Morocco	0	1.0%
Italy	0	1.3%
TOTAL	3.3%	3.1%

PROFESSIONAL DEVELOPMENT

At CIRSA we consider service excellence as a priority and we train our employees in this area. With this, we are able to strengthen our own unique personality and way of working, to transmit it every day to our customers. To make this a reality, we are **committed to internal talent** through programmes to detect and diagnose the potential of some of our employees, which we accompany with career and training plans. These help us guarantee success in internal promotions and in succession in critical positions, both in operations and in corporate areas.

Internal promotions

Encouraging internal promotion within CIRSA is essential for the professional growth and motivation of employees. By creating an environment that values and recognises internal talent, a culture is established that encourages aspiration and continued professional development. Promoting from within not only benefits the promoted individual, but also strengthens team cohesion by demonstrating that the organisation values and nurtures existing talent.

586

employees have been promoted in LATAM during this year 2023
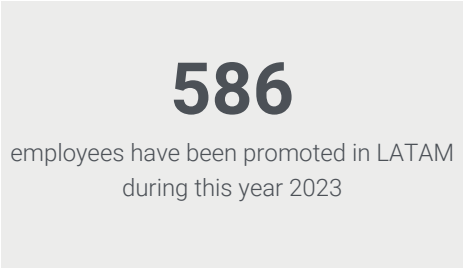
Staff rotation

Our global annual **staff turnover rate of 28.3%** is closely related to the different labour market situations in the countries where we are present. While in European countries the turnover rate is lower, in other countries this rate is higher, depending on the specific situation of the country.

In this regard, we are committed to reducing CIRSA's turnover rate, which allows us to have more stable staff and provide a better service to our customers. This means that, during 2023, this **reduction has been 20%** compared to the previous year.

	2022	2023
Spain	17.5%	14.3%
Colombia	42.9%	35.0%
Costa Rica	35.9%	35.8%
Panama	11.8%	16.4%
Dominican Republic	29.9%	23.9%
Mexico	82.2%	58.9%
Peru	58.4%	37.3%
Morocco	33.6%	19.3%
Italy	15.2%	7.9%
Total	35.2%	28.3%

Training

CIRSA's training policy differentiates 3 groups according to the type of teaching:

- **Mandatory.** We promote those guidelines that may be more strategic for the company and our culture of continuous improvement, such as training on **Responsible Gaming, Compliance and Occupational Risk Prevention**.

- **Required/specific.** Any training linked to the role each person performs, individual career development or corporate programmes. Example of these trainings would be:

    a) **Excellence Programme**, which improves the technical and service performance of the business's employees.

b) **Empowering Women's Talent** Programme to enhance female talent in the group through:

- Workshops and meetings in which to share experiences through breakfasts with managers and employees.
- Cross mentoring.
- Presentations.

c) **Diversity Leading company** Certification of Teams and Talent

- Aflorar Plan.
- Collaborations with associations such as Prodis and the Seeliger & Conde Foundation to attract diverse talent.

- **Voluntary.** Training that is available to employees, focused on providing new tools that improve the personal and professional lives of collaborators. An example of these trainings would be *Digital Skills, Smart Pills, Languages*.

Training hours by typology

(*)	2022	2023
Role improvement	Not reported	267,864
Well being	Not reported	6,498
Security and health	Not reported	44,050
Legal & Compliance	Not reported	17,433
Responsible Gaming	Not reported	9,206
Skills	Not reported	25,254
Professional development	Not reported	3,867
Total	864,305	374,172

Training hours by professional category

(*)	2022	2023
Management	4,214	15,241
Support staff	37,295	37,448
Marketing staff	4,648	5,912
Indirect gaming halls staff	16,183	57,704
Direct gaming halls staff	801,965	257,867
Total	864,305	374,172

Training hours by country

(*)	2022	2023
Spain	43,201	57,790
Colombia	647,878	171,617
Mexico	89,409	46,706
Panama	8,935	34,858
Dominican Republic	20,806	22,828
Peru	18,792	18,168
Italy	3,430	2,319
Morocco	0	16,666
Costa Rica	31,854	3,220
Total	864,305	374,172

(*) Year 2022 post-Covid reopening - specific training in the table area (dealers, croupiers....)

We are committed to internal talent with training both individually and through corporate programmes that improve the performance of our employees.

In addition to the training offered to all group personnel, there are plans for more specific groups.

WELCOME PACK

Aimed at new hires to facilitate their adaptation and facilitate the on-boarding process. Training is offered in Occupational Risk Prevention (ORP), Compliance as well as an introduction to CIRSA processes, depending on the position to be held.

INTERNAL DEVELOPMENT PLANS

They focus on detecting talent with potential in all positions in the business areas improving technical performance and customer service.

TRAINING CAPSULES

Voluntary training focused on enriching the professional and personal lives of our employees, such as language training, digital communication tools as well as activities under our motto *Enjoy Life with Us*.

SCHOOLS BY POSITION

In response to business requests, training aimed at leadership and team management is developed, through coaching or experiential training.

CIRSA SCHOLARSHIPS

All Group employees can benefit from scholarships for studies of their choice, either to complement their professional knowledge or to expand their personal experiences.

GROUP MEETINGS OR CONVENTIONS

Grouped into departments or business areas, tools are provided to develop the relevant skills in each case, through workshops, talks and presentations.

WELL-BEING OF OUR EMPLOYEES

Since people are the engine of CIRSA, we concentrate our efforts on ensuring their well-being. We focus on ensuring fair and equitable treatment of all team members and promote respect, upholding equal opportunity, regardless of gender, nationality or age.

One of our success elements for attracting the best workforce includes our working conditions, which contribute to a **work-life balance** and provide greater flexibility so our employees can care for their children and other dependent relatives.

To do this, we make sure that their needs are met throughout the year and that their holidays taken are compatible with family needs. We also offer the ability to reduce working hours to devote to childcare by up to 50%. In addition, **we are committed to increasing working from home** in positions where this mode is possible. We do this while adapting to the needs of our employees and the new context of the labour market.

In parallel with legal measures such as parental leave and reduction of working hours to care for a minor or a family member who cannot take care of themselves, at CIRSA we have implemented a series of measures to facilitate this balance:

- Teleworking, whenever possible.
- Friday with shortened day.
- Days of own business.
- Social benefits.
- Flexible remuneration.

We offer **a wide range of benefits to all our employees where they are based**, regardless of whether their contract is permanent or temporary.

We also care about the opinion of our employees. Their opinion is very valuable to us. In order **to be able to hear the voice of all of them and involve them in the management of the company**, in terms of information, consultation and participation, we have a **suggestions channel** located on the corporate Intranet in Spain and in other countries, on the web, There is a suggestion box.

Measures to facilitate balance

It is also a priority to achieve a balance between work and personal life, with the aim of improving the well-being of our staff.

Based on this, we ensure that our employees can benefit from all the resources offered by local labour regulations, so that we can establish beneficial

measures that promote the **balance of family life**. For this reason, CIRSA has established measures that entail **flexibility in the day**, both in access and at the end of it.

In the same way, to promote this balance with family life, teleworking has been introduced, which allows a significant part of our staff to be able to work from home, at least one day a week in those positions in which this measure is viable, adapting to the needs of our employees and the new context of the labour market.

Other measures that are established in the applicable local legislation are also taken into account, which allow and give access to this balance, such as maternity/paternity leave, reduction of the working day to care for a minor or a family member, or voluntary leaves of absence to care for minors and/or family members.

Switching off from work

At CIRSA, digital disconnection is considered the limitation on the use of technologies outside of work time, in order to guarantee respect for rest time, days off, holidays or sick leave. In this regard, we respect all the views of the bodies that recommend digital disconnection, to thereby encourage a better benefit in terms of balance with family and personal life with respect to the work environment. Based on this, we give priority to the obligation to guarantee the right to digital disconnection of all people, in accordance with the legislation in force in each case.

We have implemented a comprehensive campaign aimed at promoting the health of our employees globally, addressing both mental, physical and social aspects.

Physical activity	Healthy nutrition	Emotional Wellbeing
We offer Yoga, Cross-Training, Pilates and Crossfit classes, among other activities. In addition, we have paddle tennis, running and bike sports clubs.	We have created initiatives with the aim of improving our employees' knowledge and awareness of healthy eating habits.	We promote activities to improve the emotional wellbeing of our employees, such as mindfulness and laughter therapy.

Our contribution
to society

We want to continue to contribute to the development
of the local communities where CIRSA has a presence

Goal and strategy

In addition to creating local jobs and ensuring tax revenues that contribute to funding socio-economic development programmes in the countries where we operate, we are **firmly committed** to the local community and work to build strong ties with small businesses and stakeholders that are close to us. In addition, we also engage in supporting social initiatives devoted to helping the most vulnerable in the different countries where we are present.

Actions and results

ECONOMIC CONTRIBUTION

With 13,861 employees in 9 countries, our economic footprint is significant, creating **positive impacts** in the communities where we are present. An important contribution that we make to the development of the countries in which we operate is the **taxes on gaming and economic activities**. In 2023 alone it has been **795 million euros**.

Our industry is one of the most important contributors to local economies. Not only through taxes, but we also generate employment and provide entertainment to many people. As an example, Spain's gambling sector paid around €1,215 million in gambling fees to both the central government (180) and regional governments (1,035) in 2022. The economic contribution of the sector is estimated at 0.8% of GDP, while the industry creates about 85,000 direct jobs and 175,000 indirect jobs.

95%
of CIRSA staff are in local communities

€795 million
paid in gaming and business taxes

CIRSA is committed to working only in regulated markets through local companies, in order to contribute to public resources through payment of gambling taxes and corporate activity according to the level of activity in each of the countries, in addition to offering all assurances to our customers.

CONTRIBUTION TO THE COMMUNITY

At CIRSA we work to build a better society and we are proud that our taxes also contribute to doing so. In parallel, we collaborate with foundations and non-profit organisations that are well-informed about the needs of these groups. **In 2023, at CIRSA we have donated €172,167 to non-profit organisations and public entities to help those who need it most**. **The Sportium Foundation** has also donated **€84,565** to various **projects linked to the inclusion of vulnerable groups and sport**.

Below are some of the main initiatives we have been involved in by country in 2023.

Spain

Employee volunteering in the Food Bank's Great Collection campaign.

Spain

Motivational talk through the association dalecandELA.org, in support of ALS patients.

Spain

Collaboration with the blood donation campaign organized by the Blood and Tissue Bank.

Spain

Donation to the Plurals Associació LGTB+ association, maintaining support for all groups.

Peru

Partnership with Netzun to offer courses and training to employees.

Dominican Republic

Donation to the CAREMI Foundation (Women's Professional Training Center).

Panama

Volunteering of employees in cleaning mangroves in the community of Puerto Julián.

Mexico

Helping those affected by Hurricane Otis in Acapulco.

Morocco
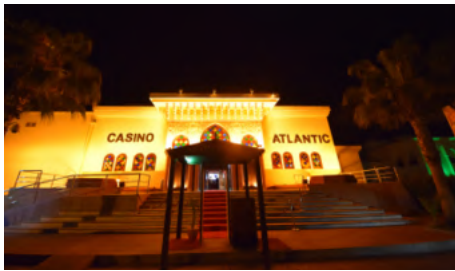
Helping those affected by the earthquake in Morocco.

Costa Rica

Solidarity tournament to raise funds for the NGO One Sea, among others.

Colombia

Campaign to promote health and good treatment at work for more than 1,400 employees.

Italy

Campaign to collect supplies and purchase pressure washers for the Emilia Romagna region affected by floods.

Corporate Governance and regulatory compliance

We are at the forefront of our industry and a corporate benchmark

Goal and strategy

At the heart of our ESG and business strategy is a strong culture of good Corporate Governance and regulatory compliance. This is achieved through a process of monitoring and controlling of our operations by applying the knowledge and experience of the members of the Board of Directors, the Advisory Board, the management team, the internal audit team and the compliance team. Our strong culture of compliance keeps us as a benchmark and at the forefront of our sector, with zero tolerance towards corruption and any violation of the laws and internal regulations that govern our activities.

We have the best mechanisms to adopt the best practices, principles and recommendations related to

The mechanisms we apply include 1:

Corporate governance and regulatory compliance standards. In fact, **ethics, integrity, respect for the law, transparency and honesty** are fundamental principles that we highlight and defend in our ethical and behavioural culture, which reaffirm and highlight our direct and absolute rejection of any irregularity.

Our activity is also designed so that each person within the company strictly complies with the legislation in force in each country and region where we operate.

01
Our **Code of Conduct**, which sets out the basic principles and standards that everyone in the Group must follow.

02
Our **Risk Management Model** based on the lines of defence model, which involves three levels of compliance control in the organization.

03
Our **Ethical Helpline Channel**, which reports on compliance matters affecting the company.

04
Our **Crime Prevention Model**, which prevents, detects, investigates and resolves any practice contrary to law and our internal regulatory body.

05
Our effective **training on compliance procedures**, which ensures that our employees are sensitized and prepared to act if they are faced with actions that go against our Code of Conduct or the policies of our internal regulatory body.

06
Our **Personal Data Protection and Information Security Policy**, which guarantees the rights and freedoms of users, ensuring the protection and privacy of their personal data.

07
Our **third-party approval processes**, which guarantee that not only our operations comply with our ethical values, but also our supply chain and business partners, among others.

All these mechanisms are supervised by the Board of Directors, which guarantees the necessary resources to achieve the strategic objectives set in the annual action plan prepared by the compliance area.

Likewise, and as stated in the Group's Code of Conduct, strict compliance with its commitments and obligations with respect to relationships with customers, suppliers and partners is guaranteed. This is the basis for avoiding any possible wrongdoing that could have a strong economic reputational impact on the company itself.

1 More details in the Actions and Results section below.

COMPLIANCE STRUCTURE
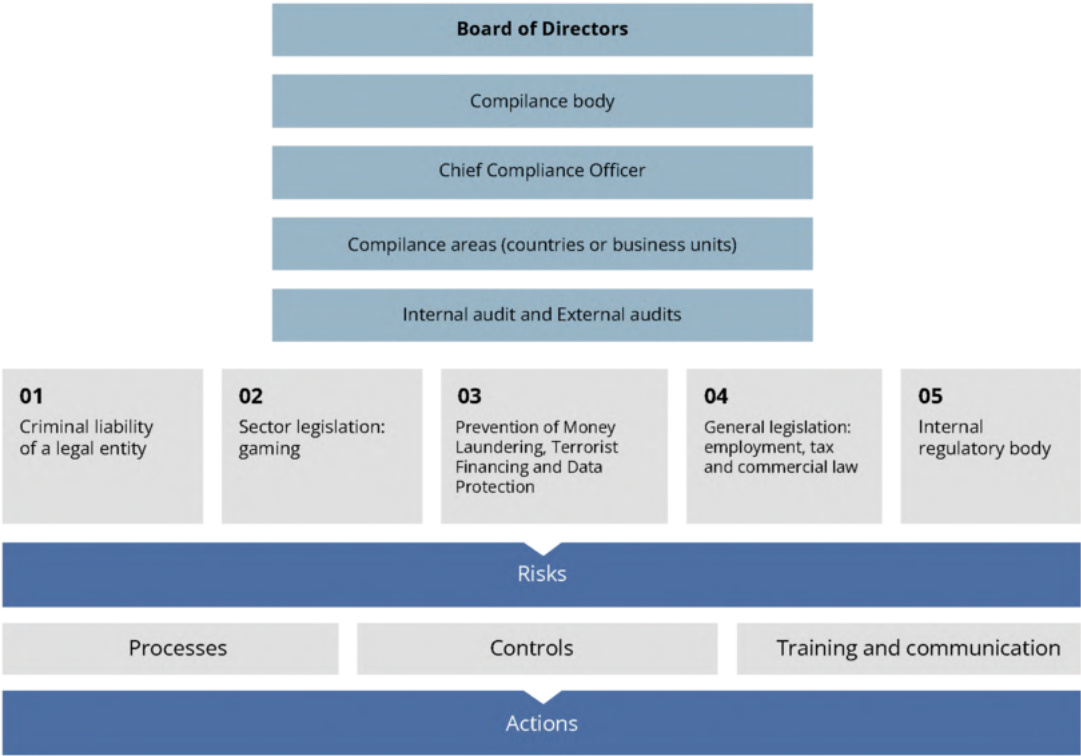
BOARD OF DIRECTORS

To achieve a solid and good functioning of Corporate Governance within the company, we focus our efforts on meeting the goals and objectives set for each year. For this reason, at CIRSA we have held **14 meetings of the Board of Directors during 2023, which exceeds the minimum required number of meetings** (4 per year).

The Board of Directors is made up of **4 members**, 2 proprietary directors representing the shareholder and 2 executive directors of CIRSA. The 2 executive directors of CIRSA are Joaquim Agut and Antonio Hostench.

Joaquim Agut, a senior manager at CIRSA for 17 years and with the position of executive chairman since July 2018, continues to lead and define the Group's strategy, supervise the management and differential corporate functions. In addition, he is the primary champion of ESG strategy, initiatives and activities.

Antonio Hostench, linked to the Group with various responsibilities since 2008 and since April 2022 as CEO, focuses his responsibility on the management of the business units (Casinos, Online Gaming and Betting, Operation of slot machines Spain and Operation of slots machines Italy) and corporate functions, holding the presidency of the Sportium group.

Likewise, in April 2023, the **Advisory Board** was established, made up of 4 members (equal composition) with advisory functions to the Board of Directors as well as the various business and corporate areas, with special focus on ESG, Compliance and Cybersecurity. This establishment of this body is carried out for the sake of future integration into the Board of Directors and formation of the Audit, Appointments and Remuneration and Sustainability committees, without prejudice to the advice to the various areas.

14	**2**
meetings of the Board of Directors in 2023	meetings of the Advisory Board in 2023

Actions and results

Our good Corporate Governance model provides a guide to best practices and has proven its effectiveness in the correct performance of our activities. The main aspects of our Corporate Governance are explained in detail below.

REGULATORY COMPLIANCE

We ensure compliance with regulations by applying the **Code of Conduct and the internal regulatory body of the Group**, which allows us to ensure that all relevant requirements are met in the countries in which we operate. To meet this goal, we have structured the organisation based on three levels of control on compliance:

1. The first level corresponds to **each business unit** in the daily management of its operations, which closely monitors the legality of the actions to be implemented based on the experience of the management team with the support of the various corporate areas.

2. The second level corresponds to the **Compliance Area**, in charge of maintaining and updating the body of internal regulations and managing the crime prevention model, which ensures compliance, shaping the Group's compliance model.

3. The **Internal Audit team**, which carries out independent reviews of this model to verify its fulfilment and the effectiveness of the established controls.

During the year 2023, 3 meetings of the Compliance Body have been held, where, among other topics, 4 new policies have been approved and 5 updated.

CODE OF CONDUCT

Our Code of Conduct defines principles of action and establishes guidelines for professional and personal behaviour that affect all employees and professionals linked to the Group.

In it, the conventions, agreements and recommendations of International Organisations on human rights, fundamental freedoms, fundamental labour rights, against corruption, prevention of money laundering and the financing of terrorism and sustainability are taken into account. Specifically, CIRSA assumes and endorses the 10 principles of the Global Compact of the United Nations through its adherence to the Pact, taking on the commitment to establishing a Culture of Compliance throughout the organisation. A Culture based on the principles established in our Code of Conduct and aligned with the postulates of the United Nations (UN) Global Compact in favour of business sustainability to create a better future, thus promoting the fight against corruption and the development of more just, peaceful and inclusive societies (#SDG16 and #Agenda2030) wherever we operate.

ETHICS LINE CHANNEL

Through our **Ethics Line Channel**, all our employees and collaborators, members of the board of directors, customers, suppliers, partners, consultants, shareholders and, in general, any person not linked to the Group, can alert, report or communicate with a full guarantee of confidentiality and, if they prefer, completely anonymously, any potentially irregular activity and behaviour that may involve a breach of our Code of Conduct or body of internal regulations.

The Ethics Line Channel is managed by the Compliance Department, available **24 hours a day, 7 days a week, and accessible in English, Italian, French and Spanish**. In the operating policy mentioned above, we explain how to use our Ethics Line Channel in more detail, the various methods of communication that exist and how the data are processed to ensure **the security and effectiveness of whistleblowing**.

During the year 2023 64 messages have been received, of which 42 have been resolved and 22 remain pending.

Received messages

- Unethical practices — 25
- Search advice — 17
- Human Rights — 10
- Security of the information — 2
- Data protection — 3
- Money Laundering — 2
- Corruption — 5
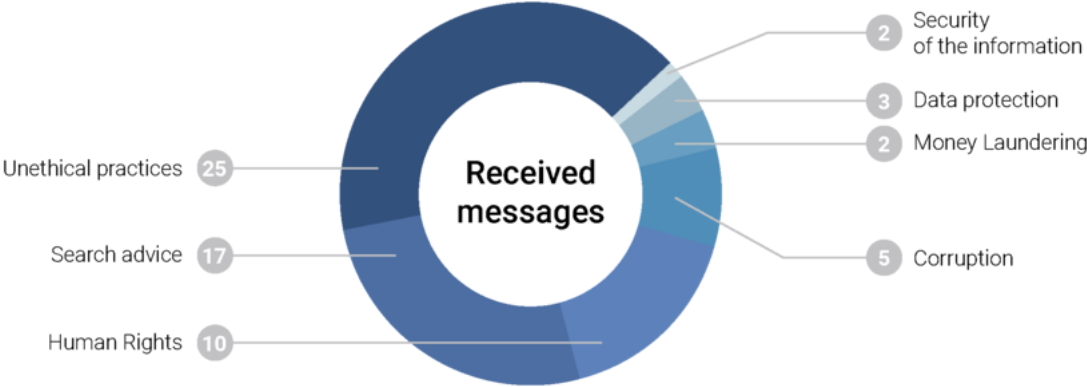
We have developed entirely with internal resources a global Internal Information System (hereinafter, "Ethics Line Channel" or "Channel") in all the countries in which the Group operates without exception following the principles established by the Directive (EU) 2019 /1937 of the European Parliament and of the Council, of October 23, 2019, relating to the protection of people who report breaches of Union Law, in accordance with the high international standards of #ISO 37002:2021 on Systems for Managing the Reporting of Irregularities and, finally, adapting it to Law 2/2023, of 20 February, regulating the protection of people who report regulatory breaches and the fight against corruption.

This channel allows us to continue to comply with the requirements of current and new European directives (such as Directive (EU) 2018/843 of 30 May 2018, Regulation (EU) 2016/679 of 27 April 2016 and Directive (EU) 2019/1937 of 23 October 2019) and to reinforce the Group's high degree of regulatory compliance. In addition, this helps us maintain a firm commitment to society, as the platform allows us to report anonymously -if desired- any potential irregularities of possible relevance that may occur within our Company or on its behalf.

We have been recognised through Sustainalytics, a leading global agency in ESG risk analysis, with the highest possible score within the directly affected areas of Business Ethics and Bribery & Corruption.

ANTI-CORRUPTION POLICY

At CIRSA we take the view that fraud and corruption have a very significant negative impact on the fair development of society.

In line with this premise, **our Anti-Corruption Policy emphasises the explicit prohibition of all forms of corruption and bribery**, understood as anything of tangible or intangible value that is offered, promised, paid, authorised or given to a third party for the purpose of unlawfully influencing a business decision or gaining an improper advantage in the activity of Group companies. Bribes can be in the form of payments, gifts, trips, entertainment, job offers, contacts, debt or donation forgiveness, among others.

CIRSA has obtained the International Anti-Corruption and Fraud Certification issued by the International Association for Cooperation in the Prevention of Fraud (ICPF)

If employees, customers, suppliers, etc. have any questions or witness any attempt at corruption and/or bribery, they must inform the Company by notifying it through the Group's Internal Information System or Ethics Line Channel as stated in their operating Policy.

Our Code of Conduct establishes the following principles with the 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 providing training and promoting ethical conduct, we can prevent unlawful behaviour that is contrary to our Code of Conduct.

2 Business courtesies

Gifts, courtesies, invitations to events, among others, will be based on our internal policy and in no case will they influence the willingness or objectivity of people outside our Group to obtain any improper business benefit or advantage.

3 Conflicts of interest

We respect the participation of our employees in activities outside the Group, as long as they are carried out within the applicable legal framework and do not compete or conflict with their obligations as our employees, nor are they used to carry out corrupt practices.

4 Facilitation payments

Unofficial and improper payments to public officials are expressly prohibited for obtaining licences, certificates and other services to which they have a legitimate right by ordinary procedures to expedite the performance of an action in their favour.

5 Fair competition

We are fully, fairly and honestly committed to competing in markets, thus promoting free competition, which is in best interest of our consumers, users and society in general.

6 Contributions to NGOs

In collaborating with non-profit organisations we do so by ensuring a clear mutual benefit and never as a means of concealing acts of corruption or bribery.

7 Relationships with third parties and intermediaries

Our employees and managers maintain relationships with customers, partners and/or suppliers, based on code of ethics of the highest standard of professionalism. We demand ethical principles in our contractual agreements, including anti-corruption standards.

8 Processing confidential information

We process the information of our customers, business partners, shareholders, investors and employees with the utmost discretion and confidentiality, strictly following our Personal Data Protection Policy, which is publicly available on our corporate website.

9 Money laundering

We collaborate with the competent authorities of each of the countries in which we operate in the fight against money laundering and the financing of terrorist activities, providing all the information requested in accordance with current rules and regulations.

10 Record of transactions

We have implemented and maintain an internal control system to prepare financial and non-financial information, guaranteeing regular supervision of its effectiveness.

11 Transparency assurance

We have a duty to provide truthful and complete information that adequately provides a fair view of the organisation's economic, financial and asset situation.

12 Corruption between individuals

We oppose and penalise any act by which any of our members or collaborators, themselves or employees promises, offers or grants an illegitimate benefit or advantage of any nature in order to favour themselves, a third party or another company.

13 Bribery

We condemn any act by which an individual offers or grants remuneration of any kind to an authority, a public official or a person working in the public domain when the latter performs an act contrary to the functions inherent to his or her position or an act related to his or her position.

14 Disclosure

We communicate and disseminate our Anti-Corruption Policy to all our employees and to those relevant third parties who must formally commit to comply with our Code of Conduct and body of internal regulations. We also carry out communication, awareness and awareness-raising actions, as well as training on compliance.

CRIME PREVENTION MODEL

In addition, we have a **Crime Prevention Model** (CPM), developed according to best practices and high-level national and international standards.

The CPM is regularly analysed by external auditors, who have confirmed the adequacy and operational effectiveness of the associated controls according to the identified risks. Therefore, **we have all the control measures to prevent and detect possible criminal acts that could be committed in each of the business units** and corporate departments, depending on the activity that is carried out.

In general, we use the Crime Prevention Model of the CIRSA Group to identify the main criminal risks likely to affect the Group, narrowing the scope and focusing it on Corruption.

The main risks identified are:

1. Corruption in business affairs
2. Illegal funding of political parties
3. Bribery
4. Influence peddling
5. Money laundering
6. Terrorism financing

These risks are associated with the main activities of the Group with the objective of preparing a Criminal Risks and Controls Matrix on which to base the Model. It includes as the main assessment variable the adequate operation of the controls associated with the CPM.

Therefore, we have all the control measures to prevent and detect possible crimes that could be committed in each of the business units and corporate departments, depending on the activity carried out.

- The probability of occurrence
- The magnitude of the impact

In addition to the Matrix, for the Crime Prevention Model itself to be effective, it is also necessary to have an Assessment Model, where the identified criminal risks can be assessed and classified.

Finally, each identified and assessed risk has assigned a series of cross-divisional and other specific controls in order to mitigate its inherent risk to a residual risk located within the risk aversion limits defined by the Group. As a result of the analysis of the criminal acts that may potentially apply to the CIRSA Group based on its activities and taking into account the assessment model, **Heat Maps of Criminal Acts Risks** are obtained for the Group's lines of business.

The CPM has a very marked evolutionary character of adaptation and continuous improvement. For this reason, during 2023 we have promoted the improvement of the Crime Prevention Model of the CIRSA Group in Spain and, coordinating its globalisation for its implementation and implementation in other LATAM countries (Mexico, Panama, Colombia and Peru) following the standards of the #UNE 19601:2017 on Criminal Compliance Management Systems that have allowed CIRSA to be recognised among the Top 3 worldwide within our sector in the Sustainalytics ESG Risk Rating.

For yet another year, CIRSA has been one of the sponsors of the IV International Compliance Week 2023. During one working day we actively participated as panellists on the topic of coordination between Compliance, Audit and Internal Control, demonstrating the value that the Compliance Officer brings to the organizations.

TRAINING IN COMPLIANCE PROCESSES

In addition to the documents and support channels available to our employees, we also offer mandatory virtual and in-person training courses to better prepare our team for potential actions contrary to our Code of Conduct or compliance policies. Our employees more exposed to situations that may give rise to a breach of our Code of Conduct or internal compliance policies have received **17,433 hours of training** on prevention against money laundering and terrorist financing, data protection and information security and in General Compliance, in addition to other communication actions focused on raising awareness and sensitisation on high-risk and/or topical matters through internal communications and newsletters.

Our goal for 2024 is to update training for 100% of exposed employees.

During 2023 we have organized the I International Congress of the Compliance Area of the CIRSA Group, held last April. At CIRSA we are aware that continuous training is a fundamental pillar to achieve this objective and we believe that this type of actions aimed at the team responsible for this matter are a strategic line of action to ensure and guarantee it.

With this spirit, the Congress was organised as a forum for learning and continuous updating where we could share experiences, best practices and promote cohesion and synergies. In this regard:

- Talks were held on the Prevention of Money Laundering and the Financing of Terrorism as well as the Protection of Personal Data, with the participation of leading experts.

- Practical individual and team workshops were held on real cases, creating convergence and synergy round tables to exchange experiences and best practices, sharing the main strategic lines and upcoming developments.

CYBERSECURITY AND PRIVACY

CIRSA has been ranked in the first quartile and above the baseline in Blackstone's Annual Cybersecurity Review, comprised of more than 100 different companies.

Portfolio-Wide Ranking:
1st Quartile

Baseline

98% CIRSA

73% All companies
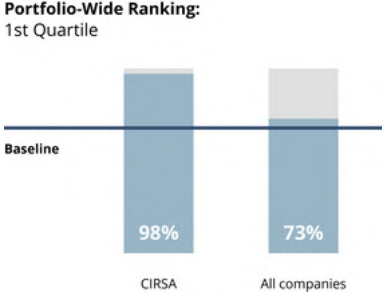
Our cybersecurity programme has been in place for the past 14 years and is being permanently reviewed and evaluated by a Blackstone cybersecurity team. Currently, it has a team of 9 people, including a chief information security officer (CISO), as well as the advice of a member of the Advisory Board, an expert in cybersecurity.

The programme has **four main objectives**:

1. avoid fraud
2. protect the data processes
3. prevent data leaks
4. guarantee business continuity and recovery.

In this regard, the cybersecurity measures we have implemented cover several fundamental aspects to ensure the strictest control. All these measures are complemented by **carrying out drills and exercises to prepare for adverse situations**.

Regarding our network, we highlight the implementation of **state-of-the-art firewalls**, as well as the **Intrusion Detection System** (IDS) and **tools that provide a Zero Trust approach**, all connected to the most critical sectors for the company. **User management** is another key point for CIRSA's security, strictly establishing a categorisation of profiles and adapting a vision of the least possible privilege throughout the company.

This, together with the constant **training provided to employees**, generates a security ecosystem in which the group feels very comfortable. Specifically, we have achieved **90,000 cybersecurity training impacts** including those related to raising awareness, phishing drills, learning modules and information leaflets. These impacts are expected to continue to increase in numbers through in-person training, on-demand videos, and special training courses delivered during our cybersecurity month. In 2023, we recorded 0 reportable cybersecurity incidents.

Leading solutions have also been implemented in other areas of security, such as the **EDR solution**, a leader in most published quadrants, or **monitoring systems** that allow for anomalous behaviours to be detected, acting automatically via **playbooks created for each specific situation**. and allowing for a rapid response to prevent their unintended spread. All of this is operated by a **team that is highly qualified and continuously trained** to adapt their knowledge to the changing reality we face.

The organisation also conducts ongoing **audits of its servers and applications**, including new ecosystem additions. Critical projects are also audited by third party companies, and the results have been satisfactory, confirming the good work done by the organisation.

In 2023, the following have been carried out:

±90,000	±3,000	+2,000	1,300	0
formative impacts	Blocked URLs	audits	parried attacks	cybersecurity incidents

During the year 2023, 2 meetings of the Cybersecurity Committee have been held.

Regarding privacy, CIRSA complies with applicable laws related to data protection and information security.

In particular, **we guarantee the application of Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, as well as the national regulations of each country where we operate**. To guarantee data protection in each of our markets, we adopt technical, legal and organisational measures to prevent loss, misuse, alteration, unauthorised access and leakage of processed personal data, taking into account the technology used. and the nature and typology of data and its exposure to risk, among others.

We ensure that each new product and service offered complies with the privacy principles defined by the General Data Protection Regulation and the strictest privacy regulations, which denotes a clear desire to guarantee the protection of personal data and fundamental rights and freedoms of users. To this end, we have a firm commitment to continue working in full compliance with the regulations and, among the measures adopted, we appoint a Delegated Data Protection Commission, which ensures the implementation and strict compliance with Regulation (EU) 2016/679. throughout the Group. In addition, we implemented new internal processes that were executed throughout our facilities with the goal of ensuring the protection of the data of our customers, employees and collaborators.

In 2023 regarding matters of privacy, there have been zero data breaches and 0% of customer data has been used for secondary purposes.

0	**0%**
security breaches	of customer data used for secondary purposes
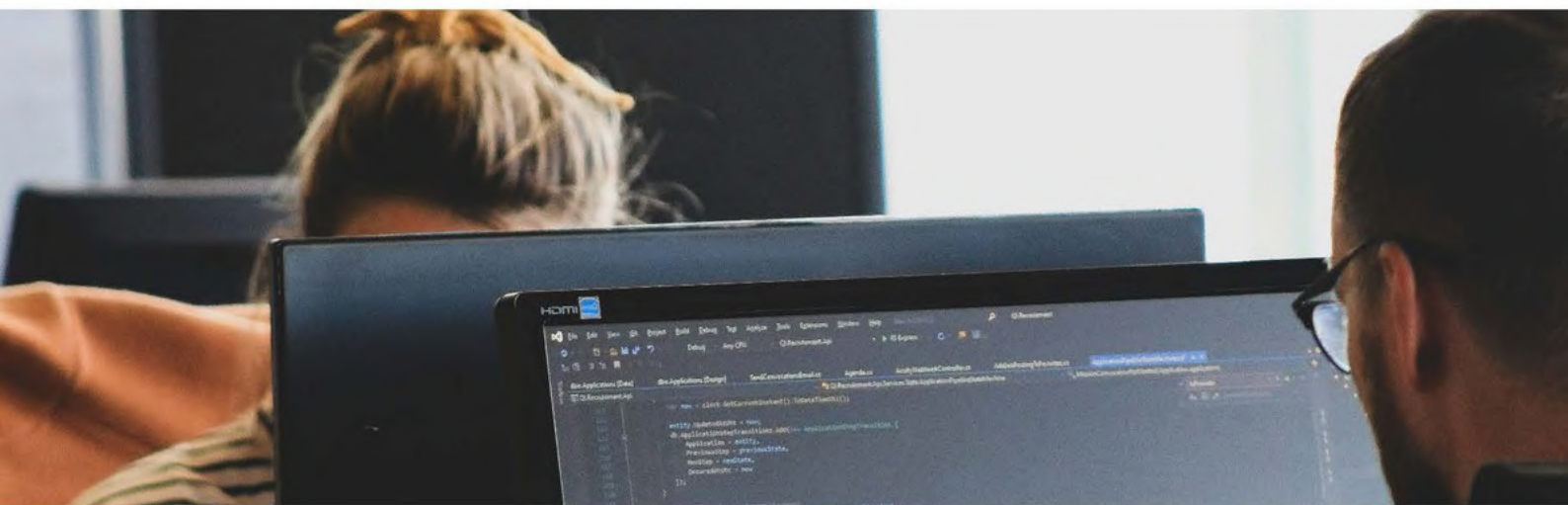
OUR CUSTOMERS: COMPLAINTS MANAGEMENT

For the different business areas there are several complaint channels. The most common of all of them is the customer's complaint in the gaming room itself, which is attended to immediately by the various customer service teams and those in charge of the rooms, which are mostly resolved instantly. As this is an informal complaint, there is no record of these.

For the **Online gaming and betting** business unit (Spain), there is another complaint reception tool called JIRA that records cases related to consumer complaints both online and retail, specifically, for online, **197** complaints have been received and for retail **30** complaints. In 2022, a total of 180 complaints were reported. The increase in complaints is linked to the evolution of the business itself.

For the **Casinos** business unit, specifically in the traditional bingo halls, satisfaction surveys are channelled through the *My Business* application, with the unsatisfactory ones being duly resolved by the sales team, receiving a total of **168** complaints.

For the **casinos** there is another tool complaint reception centre called *Opinator*, where the customers can express their opinion through surveys. The customer service team is in charge of monitoring and responding to them. In 2023, a total of **3,220** complaints have been received for all the group's casinos (except casinos in Morocco), all of them being satisfactorily resolved.

Exceptionally, some type of complaint has been received through the email info@cirsa.com and has been redirected to the different business units.

In the **Slots Spain and Italy** business units there is no direct channel for complaints with the end customer, since possible incidents or breakdowns of the machines that may arise are channelled through the owner of the establishment where the machines and the Technical Assistance Service are located.

Finally, within the Slots Spain business unit, in the group's **B2B**, complaints are channelled by the Quality Department, having received a total of **117** complaints in 2023, theses being resolved in the same year.

| Receipt of the complaint claim through specific channels | Registration and analysis of the complaint/claim in the tool | Resolution of the complaint/claim |

227
number of complaints received in 2023 in online games and betting.

3,505
number of complaints received in 2023 in the various business units.
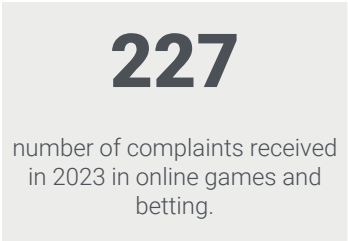
We have set ourselves the goal for 2024 of unifying criteria for receiving complaints and claims for all our business units.

RESPONSIBLE SUPPLY CHAIN

The CIRSA group's action objective is to strengthen its supply chain while hoping to positively influence the economic development of local communities. CIRSA preferentially chooses local suppliers for certain product categories, considering their proximity to the service distribution centres.

We have a platform for supplier management in which the supplier registers, selects the supply and service categories that it makes available to us and completes the approval forms.

With the approval of our suppliers, we activate **a due diligence mechanism that consists of collecting and safeguarding the supplier's ESG information**. Through the approval forms we confirm that the supplier **takes into account social, environmental and Gender Equality aspects in its organisation and management practices**. Once all the information has been collected and validated, the supplier will be considered approved.

We prioritise purchasing with those suppliers that are approved, so we encourage them proactively to align with our sustainability strategy and move forward into the process. Currently we do not have a blocking mechanism implemented for those suppliers that are "Not approved" for ESG issues, however, aware of our role as responsible for the dissemination and communication of this issue, we collaborate with those suppliers that have difficulty in being approved. , providing them with the support they need to complete it favourably and in this way we put the commercial relationship and sustainability on the same line of importance.

During 2023, the main focus has been **on promoting the approval of our suppliers identified as critical**, avoiding exclusions or replacement measures in the medium and long term that may represent a risk for both parties. The criticality of suppliers has been determined through the turnover volume and the importance of the supply or service category for the operation of the business. We are currently working on the approval of 100% of our suppliers identified as critical and we are striving to increase our reach towards those with potential criticality.

In 2023 we worked with 9,216 suppliers*, with a total contract value of €465 million. Of the total suppliers, 2,964 are approved for their criticality and 2,019 have been approved, representing 90% of the contracted volume.

2,964	**2,019**	**€ 465** million	**90%**
approved suppliers	approved suppliers	Value of procurement	volume contracted by approved suppliers
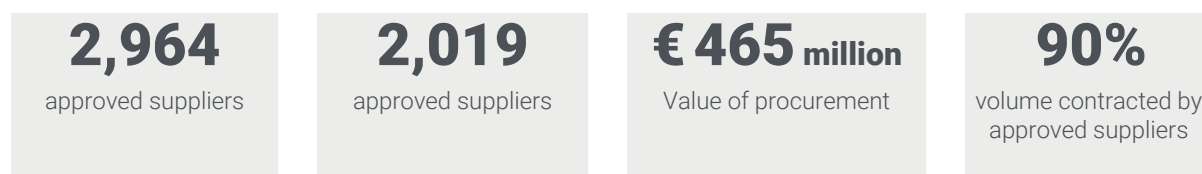
(*) Suppliers from Italy and Morocco are not included

Currently, on-site audits are not carried out on any of our suppliers, although the CIRSA group works continuously to align its suppliers and reinforce commitment. However, in 2023, **a digital audit mechanism has been implemented** within the administrative approval, which consists of validating that the documentary evidence provided by the supplier is coherent and duly updated. This year, **372 digital audits** have been carried out.(*)

This, together with **the implementation of a second phase of "category" approval**, will allow us to delve deeper into the supplier's compliance, verify and confirm its capacity and strengthen long-term relationships, having assessed the risks associated with its contracting which could occur as a consequence of the supply or service category, especially those service categories such as: cleaning or security, etc.

(*) No nonconformities have been identified in them.

In the same way that we have an approval process which we have committed to improve each year based on advances in sustainability, we also have a digitalised bidding process to ensure maximum transparency in the awarding of bids. This process works in the supplier management platform. This tool allows us to offer highly critical requirements for the various areas of the company. The award of the bid is carried out considering the supplier's compliance with the sustainability criteria included in the administrative approval, competitiveness, quality, general conditions of the service and flexibility in payment conditions.

The actions developed by CIRSA in 2023 have been **aimed at strengthening the Governance of the Global Sourcing Department**, starting with an internal restructuring in which leadership has prevailed as a driving force in the efficient management of purchases, ethics and transparency, development and achievement of competitiveness and sustainability objectives.

As part of the restructuring process and the inclusion of responsible and sustainable management of Purchasing, the **Global Purchasing Policy** and the procedures and/or manuals linked to it have been subjected to an exhaustive review and analysis, giving rise of a **new and renewed Responsible and**

Sustainable Purchasing Policy in which the guiding principles of the purchasing function and the way in which the actions of those responsible for the acquisition of products and/or services related to the business activity will be developed are defined. Likewise, as part of our commitment to the fair transition of our supply chain towards sustainability, we have considered it important to include within the Purchasing Policy the commitments assumed in social, environmental and legal matters by the CIRSA Group, as well as the importance of **integrating ESG aspects** throughout the purchasing process.

The CIRSA Group believes that the Supply Chain has special importance in the face of change and business, economic and social transformation, recognising that the acceleration towards the achievement of the Sustainable Development Goals promoted by the 2030 agenda depends on joint work with its suppliers and of alignment with the ethical and transparency standards of commercial activity, which is why in 2023 the CIRSA Group has created a **Code of Ethics and Conduct for suppliers** in which the minimum guidelines necessary to strengthen a solid commercial, reliable relationship for both parties are established.

We tale forward our presence in training actions and events, promoted by the United Nations Global Compact, in order to deepen our responsibility in the transition towards supply chain sustainability.

Academy

Este certificado se entrega a

CIRSA ENTERPRISES, S.L.

en reconocimiento a su finalización de la sesión de aprendizaje

Cadenas de suministro responsable - Promoviendo la sostenibilidad entre los proveedores

2023

The code of ethics and conduct of Suppliers of the CIRSA Group is framed within an ideal of cooperation and respect for human rights, consistent with the reciprocity of the commitment and image of the parties. Likewise, it promotes transparency and the values of organisations.

By 2024, the **Supplier Code of Ethics and Conduct** may be publicly viewed in the company web portal

www.cirsa.com and **will be subject to acceptance by the supplier on the CIRSA Purchasing Platform** within the supplier approval process. This acceptance implies a bilateral commitment to the defence of human rights, environmental protection, transparency and legality.

RELATIONSHIP WITH BUSINESS ASSOCIATIONS AND EMPLOYERS

It is also important to highlight the relationship we maintain with the main business associations and associations. These relationships are vitally important to our commitment to sustainability and responsible business development.

The main business associations and associations in which we have a presence in Spain are:

United Nations Global Compact

Leading Business Sustainability Initiative

Compliance Officers Institute

Association that brings together compliance officers of major multinationals

Spanish Confederation of Business Organizations (CEOE)

Business organization that represents Spanish businesspeople.

Foment del Treball Nacional

Confederation that represents Catalan businesspeople and industry.

Gaming Business Council (CEJUEGO)

Employers' association that represents the private gaming sector in Spain.

Spanish Confederation of Businesspeople of Recreational Gaming in Hospitality (COFAR)

It brings together regional associations of entrepreneurs of slot machines in hospitality.

Spanish Association of Gaming Casinos (AECJ)

Association that represents the casinos of Spain either at the national or EU level.

Spanish Confederation of organizations of Bingo game entrepreneurs (CEJ)

It brings together the regional associations of businessmen in the bingo sector.

Spanish Association of Game and Recreational Venue Business Owners (ANESAR)

It brings together the regional associations of businesspeople in the gaming hall sector.

JDigital

Association that represents online gaming licensees in Spain.

Patronal of the Joc Privat de Catalunya

Business association made up of the main private gaming companies in Catalonia.

Spanish Association of Manufacturers of Slots Machines (ASESFAM)

Association of Manufacturers of Slots Machines.

HUMAN RIGHTS

At CIRSA we promote **respect for Human Rights in all our business relationships, as well as with our employees, customers, suppliers and collaborators**.

In addition to our adherence to the United Nations Global Compact, we are aligned with:

· The Universal Declaration of Human Rights.

· The International Labours Organization's Declaration on Fundamental Principles and Rights at Work.

· The United Nations Guiding Principles on Companies and Human Rights.

· The OECD Guidelines for Multinational Enterprises.

· The European Convention on Human Rights.

In this regard, independently of our public commitment through the Human Rights Policy, we have measures to identify and manage any type of potential breach of human rights (including forced and child labour, as well as the rights of minors) in our supply chain. Among these measures, we highlight our supplier approval process, which allows us to avoid the acquisition of any service or product that involves, for example, child labour or forced labour in any of our markets and countries in which we operate. Likewise, we have the Ethics Line channel open to any interested party where they can report any possible violation of human rights. In this year 2023, through the Ethics Line channel, 10 possible cases of violation of human rights have been reported, **6 cases having been resolved**, 4 remaining pending as of 31/12/2023.

Conclusions

CONCLUSIONS

This report highlights the significant commitments and progress our organisation has made across the Environment, Social and Governance (ESG) pillars. We are firmly committed to the integration of sustainable practices in all facets of our operations, recognising the importance of contributing positively to both the well-being of society and the care of the environment.

Responsible Gaming as a differentiated dimension is the focus of our efforts and at the same time the main concern of our stakeholders as demonstrated in the materiality analysis carried out.

In environmental matters, we have implemented solid initiatives to reduce our carbon footprint and minimise the environmental impact of our activities. Our commitment to renewable energy and efficient resource management remains a priority.

In the social sphere, we have strengthened our relationships with local communities, promoting diversity and inclusion in our workforce and contributing to the sustainable development of the regions in which we operate. The health and safety of our employees is critical, and we will continue to invest in programmes and measures that support their well-being.

In terms of governance, we maintain high ethical standards and transparency in all our business practices, ensuring accountability and integrity in all operations.

This report reflects our ongoing commitment to constant improvement in terms of sustainability. We recognise that this is an ongoing journey, and we strive to work collaboratively with all of our stakeholders to address current and future challenges.

We are grateful to all those who contribute to our focus on sustainability, and we are excited to continue working together to forge a more sustainable and resilient future.

Appendix

KPI 2023

Environmental KPIs

		2022	2023
Consumption	Total water consumption (m3)	512,917	546,334
	Average water consumption (m3) per gaming hall	1,254	1,285
	Average water consumption (m3) per m2	1.49	1.54
	Total power consumption (kWh)	186,981,332	199,292,161
	Total fuel consumption (kWh)	35,728,145	35,944,408
	Total electrical consumption (kWh)	151,253,187	163,347,753
	Total renewable energy consumption (kWh)	99,780,710	104,051,585
	Self-generation of photovoltaic energy (kWh)	788,618	961,909
	Percentage of renewable energy consumption	66%	64%
	Percentage of renewable energy consumption with the possibility of GO contracting	84%	90%
	Average energy consumption (kWh) per gaming hall	457,167	468,923
Emissions	Greenhouse gas emissions (Scope 1) tCO2e	12,924	12,770
	Greenhouse gas emissions (Scope 2 market-based) tCO2e	16,391	19,805
	Greenhouse gas emissions (Scope 2 location-based) tCO2e	34,970	44,341
	Greenhouse gas emissions per gaming hall (tCO2e)	71.6	76.6
	Greenhouse gas emissions per m2 (tCO2e)	0.08	0.09
Waste	Hazardous waste (tonnes) *	<20	<20
	Non-hazardous waste (tonnes)	870	896
	Corporate and manufacturing recycled waste	91%	91%

*Estimated data

In 2023 we have recovered the pre-pandemic level of economic activity. This year, without the limitations arising from COVID-19, we have expanded our offer by adding new gaming halls in accordance with our expansion policy, keeping our business and environmental strategy intact.

Social KPIs

Employee wellbeing		2022	2023
	Total number of employees	13,338	13,861
	Staff rotation index	35.2%	28.3%
	Training hours by professional category	See Table 1 below	See Table 1 below
	Accidents	283	327
	Frequency index	11.29	8.07
	Severity index	0.19	0.17
	Number of occupational diseases	0	0

Equality, Diversity and Inclusion		2022	2023
	Number of employees by professional category, age and country	See Tables 2, 3 and 4 below	See Tables 2, 3 and 4 below
	Global wage gap	See Table 5 below	See Table 5 below
	Percentage of women in management positions in gaming rooms	43%	50%
	Number of internal promotions	Not reported	586
	Number of nationalities	59	80
	Percentage of female employees	49%	49%
	Percentage of women employed in Latin America	56%	56%
	Number of employees with disabilities	123	125

Responsible Gaming			
	Number of facilities certified as Responsible Gaming	12,425	15,942
	Number of self-exclusions (online gaming)	35,496	41,615
	Number of betting limits set (online play)	2,738	3,163
	Number of risk situations proactively detected through supervision systems	468	362

Suppliers			
	Number of certified suppliers	2,572	2,964
	Number of certified suppliers	1,247	2,019
	Total value of supplier contracts (€M)	373	465
	% contracting volume of certified suppliers	82%	90%

Company			
	Total taxes on gaming activity and corporate taxes (millions of euros)	662	795

Customers			
	Number of complaints/claims received Online games and betting	180	227
	Number of complaints received by other business units	Not reported	3,505

Table 1

Training hours by professional category

	2022	2023
Management	4,214	15,241
Support staff	37,295	37,448
Marketing staff	4,648	5,912
Indirect gaming halls staff	16,183	57,704
Direct gaming halls staff	801,965	257,867
TOTAL	864,305	374,172

Table 2

Total number of employees by country

	2022	2023
Spain	4,434	4,516
Colombia	2,772	2,777
Costa Rica	334	332
Panama	1,247	1,278
Dominican Republic	818	832
Mexico	2,057	2,140
Peru	797	877
Morocco	522	610
Italy	357	499
TOTAL	13,338	13,861

Table 3

Total number of employees by age

	2022	2023
< 30	3,339	3,369
30 - 50	7,768	8,119
> 50	2,231	2,373
TOTAL	13,338	13,861

Table 4

Total number of employees by professional category

	2022	2023
Management	769	686
Support staff	1,703	1,745
Marketing staff	381	446
Indirect gaming halls staff	3,203	3,424
Direct gaming halls staff	7,282	7,560
TOTAL	13,338	13,861

Table 5

Wage gap

	2022				2023			
	Women	Men	VAbs	V%	Women	Men	VAbs	V%
TOTAL (*)	11,951	18,799	6,848	36.4%	13,113	21,073	7,960	37.8%

(*) To calculate the global gap, salaries by country have been added applying the average exchange rate for the year, the same one used for the drafting of the Annual Accounts. Formula used: (Average salary for men − Average salary for women) / Average salary for men

Table 6

Employees broken down by contract type, age and gender to 31.12.2023

| | 2022 | | | | | | 2023 | | | | | |
| | < 30 | | 30 - 50 | | > 50 | | < 30 | | 30 - 50 | | > 50 | |
	Women	Men	Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
Indefinite	1,815	1,345	3,707	3,729	708	1,440	1,757	1,332	3,853	3,851	783	1,527
Full time	1,815	1,342	3,576	3,537	708	1,440	1,729	1,305	3,628	3,774	732	1,496
Part time	0	3	131	192	0	0	28	27	225	77	51	31
Temporary	79	100	144	188	31	52	151	129	156	259	29	34
Full time	79	100	123	175	31	52	144	124	137	248	24	31
Part time	0	0	21	13	0	0	7	5	19	11	5	3
TOTAL	1,894	1,445	3,851	3,917	739	1,492	1,908	1,461	4,009	4,110	812	1,561

Table 7

Employees broken down by contract type and job category to 31.12.2023

| | 2022 | | | | | 2023 | | | | |
	Management	Support staff	Marketing staff	Indirect gaming halls staff	Direct gaming halls staff	Management	Support staff	Marketing staff	Indirect gaming halls staff	Direct gaming halls staff
Indefinite	768	1,661	378	3,130	6,807	674	1,682	434	3,314	6,999
Full time	768	1,661	378	2,998	6,613	665	1,616	430	3,245	6,708
Part time	0	0	0	132	194	9	66	4	69	291
Temporary	1	42	3	73	475	12	63	12	110	561
Full time	1	42	3	73	441	12	63	11	105	517
Part time	0	0	0	0	34	0	0	1	5	44
TOTAL	769	1,703	381	3,203	7,282	686	1,745	446	3,424	7,560

KPI Governance

		2022	2023
Board of directors	Number of Board of Directors meetings	9	14
	Tenure of the Executive Presidency (years)	16	17
Training in matters of governance	Number of employees receiving and completing training courses on anti-corruption, anti-money laundering and regulatory compliance topics	10,195	17,433
Cybersecurity	Number of data breaches	0	0
	Percentage of customer data used for secondary purposes	0	0
	Number of training impacts on cybersecurity	201,000	90,000
Compliance	Number of confirmed cases of bribery or corruption	0	0
	Number of possible cases of human rights violations	0	10
Taxation	Value of donations to non-profit organizations (in euros)	443,060	172,167
	Profits obtained country by country (thousands of euros)	Table 8	Table 8
	Taxes on profits paid (thousands of euros)	Table 9	Table 9
	Public subsidies received (thousands of euros)	0	30

Table 8

Profits obtained country by country (thousands of €)

Country	2022	2023
Spain	13,942	12,521
Colombia	27,405	28,694
Mexico	1,938	11,040
Panama	28,203	39,267
Dominican Republic	15,550	16,453
Peru	-2,740	-4,202
Italy	11,749	17,733
Morocco	10,375	13,048
Costa Rica	2,787	4,519
TOTAL	109,209	139,071

Table 9

Taxes on profits paid (thousands of €)

Country	2022	2023
Spain	14,564	30,292
Colombia	9,887	26,903
Mexico	337	1,423
Panama	10,081	20,593
Dominican Republic	0	49
Peru	6	2,336
Italy	84	3
Morocco	0	5,541
Costa Rica	325	1,423
TOTAL	35,284	90,757

GRI content Index

Statement of use	CIRSA has submitted the information listed in this index of GRI content for the period from 01 January 2023 to 31 December 2023, using the GRI Standards as a reference.
Applicable GRI Sector Standards	Not applicable

GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
1	Fundamentals 2021	Appendix: GRI indicators	94

THE ORGANIZATION AND ITS REPORTING PRACTICES			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
2-1	Organisational details	a) 1. Message from the Chairman b) 2. About this report c) Contact information d) 3. About us	4,7,15,115
23	Report period, frequency and point of contact	a) GRI indicators b) 2. About this report c) 2. About this report d) Contact information	7,94,115
2-4	Entities included in the presentation of the sustainability report	a) Consolidation of the group	108
2-5	External verification	Voluntary verification	111

ACTIVITIES AND WORKERS			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
2-6	Activities, value chain and other business relationships	a) 3. About us: Our business activity b) 3. About us: Our business activity b) 7. Corporate Governance and regulatory compliance: Actions and results	13,14,15,83
2-7	Employees	a) 6. Social: The CIRSA team b) i) 6. Social: The CIRSA team b) ii) 6. Social: The CIRSA team b) iv) 6. Social: The CIRSA team b) v) 6. Social: The CIRSA team e) 6. Social: The CIRSA team	52,55,59,60

GOVERNANCE			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
2-9	Governance structure and composition	a) 7. Corporate governance and regulatory compliance	72,73,74
2-11	Chairman of the senior governing body	a) 7. Corporate governance and regulatory compliance b) a) 7. Corporate governance and regulatory compliance	73
2-12	Role of the senior governing body in monitoring impact management	a) 1. Message from the Chairman c) 1. Message from the Chairman	4
2-13	Delegation of responsibility for impact management	a) 1. Message from the Chairman c) 1. Message from the Chairman	4
2-14	Function of the highest governing body in the sustainability reports	a) 2. About this report; 7. Corporate governance and regulatory compliance: Goal and strategy	7,73

STRATEGY, POLICIES AND PRACTICES			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
2-22	Statement on the strategy for sustainable development	a) 1. Message from the Chairman	4,5
2-23	Commitments and policies	a) 3. About us b) 7. Corporate governance and regulatory compliance e) 7. Corporate governance and regulatory compliance	27,74,86
2-24	Incorporation of commitments and policies	a) i 1.Message from the Chairman; 3. About us a) iv 1.Message from the Chairman; 3. About us; 6. Social: The CIRSA team	4,13,27,63
2-25	Processes for remedying negative impacts	1.Message from the Chairman Risk management 7. Corporate governance and regulatory compliance	4,5,17,82
2-26	Mechanisms for seeking advice and raising concerns	a) ii 7. Corporate governance and regulatory compliance	75
2-27	Compliance with laws and regulations	a) ii 7. Corporate governance and regulatory compliance	72,74
2-28	Affiliation to associations	a) 4. Responsible Gaming	41

PARTICIPATION OF STAKEHOLDERS			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
2-29	Focus for stakeholder' engagement	a) 6. Social: Our contribution to society	68
2-30	Collective bargaining agreements	a) 6. Social: The CIRSA team	58,59

CONTENTS ON MATERIAL TOPICS			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
3-1	Process of determining material topics	a) 2. About this report b) 2. About this report	8,9,10
3-2	List of material topics	a) 2. About this report b) 2. About this report	11
3-2	Managing material topics		17, 34,36,37,38,39 40,43,44,51

MATERIAL TOPICS

SAFE GAMING			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
416-1	Assessment of health and safety impacts of the categories of products or services	4. Responsible Gaming	39,40
417-1	Requirements for the information and tagging of products and services	a) iii 4. Responsible Gaming	39,40
417-2	Cases of non-compliance related to the information and tagging of products and services	Not applicable Due to the activity and sector of the Group	
417-3	Cases of non-compliance related to marketing communications	Not applicable Due to the Group's activity and sector	
CYBERSECURITY AND DATA PROCESSING			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
418-1	Substantiated claims regarding customer privacy breaches and loss of customer data	7. Corporate governance and regulatory compliance	81

CORRUPTION, BRIBERY AND MONEY LAUNDERING			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
205-1	Operations assessed for corruption related risks	b) 7. Corporate governance and regulatory compliance	76,77,78,79
205-2	Communication and training on anti-corruption policies and procedures	b) 7. Corporate governance and regulatory compliance	73
205-3	Confirmed cases of corruption and actions taken	b) 7. Corporate governance and regulatory compliance	75

IMPACT OF LOCAL COMMUNITIES			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
413-1	Operations with local community's involvement, impact assessments and development programmes	a) iv 7. Corporate governance and regulatory compliance a) vii 6. Social: The CIRSA team a) viii 7. Corporate governance and regulatory compliance	60,61,72,73,74

TALENT MANAGEMENT AND WORKING CONDITIONS			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
201-3	Defined benefits plan and other retirement plan obligations	Not applicable The Group does not have a defined benefits plan or other retirement plans	
401-1	New employee hirings and turnover of personnel	b) 6. Social: The CIRSA team	56,62
401-2	Benefits for full-time employees not given to part-time or temporary employees	b) 6. Social: The CIRSA team	65,66
404-1	Average hours of training per year per employee	b) 6. Social: The CIRSA team	63
404-2	Programmes for improving employee skills and transition assistance programmes	b) 6. Social: The CIRSA team	62,62,64

HEALTH AND SAFETY AT WORK			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
403-1	Occupational health and safety management system	6. Social: The CIRSA team Compliance with prevention regulations	60,61
403-2	Hazard identification, risk assessment and incident investigation	a) 6. Social: The CIRSA team	60,61
403-3	Occupational health services	6. Social: The CIRSA team Compliance with prevention regulations	60,61
403-4	Worker's participation, consultation and communication regarding occupational health and safety	a) 6. Social: The CIRSA team b) 6. Social: The CIRSA team	60,61
403-5	Training of workers in occupational health and safety	a) 6. Social: The CIRSA team	60,61
403-6	Promoting the employees ' health	a) 6. Social: The CIRSA team	66
403-7	Prevention and mitigation of impacts on the workers' health and safety directly	a) 6. Social: The CIRSA team Occupational Risk Prevention Policy	60,61
403-8	Coverage of the occupational health and safety management system	6. Social: The CIRSA team Compliance with prevention regulations	60,61
403-10	Occupational sicknesses and illnesses	a) 6. Social: The CIRSA team	60,61

WORKING CONDITIONS OF EXTERNAL WORKERS			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
401-2	Benefits for full-time employees not given to part-time or temporary employees	a) 6. Social: The CIRSA team	65,66

EQUALITY, DIVERSITY AND INCLUSION			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
405-1	Diversity in governing bodies and employees	a) 6. Social: The CIRSA team	52

ENERGY CONSUMPTION			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
302-1	Energy consumption within the organisation	a) 5. Environment a) KPIs 2023 b) 5. Environment The data are shown in Kwh, not in Joules	45,46,90
302-3	Energy intensity	a) 5. Environment b) 5. Environment includes electricity and fuel consumption (natural gas, propane, butane, diesel, LPG (liquefied petroleum gas) and petrol)	45
302-4	Reduced energy consumption	a) 5. Environment b) 5. Environment c) 3. About us	31,45,46,47

GREENHOUSE GAS (GHG) EMISSIONS			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
305-1	Direct GHG emissions (scope1)	a) 5. Environment b) CO$_2$ (gas included in calculations) e) 5. Environment g) 5. Environment	47
305-2	Indirect GHG emissions from generating energy (Scope 2)	a) 5. Environment b) 5. Environment e) 5. Environment g) 5. Environment	47
305-3	Other indirect GHG emissions (scope 3)	a) 5. Environment	47
305-4	Intensity of GHG emissions	a) 5. Environment b) 5. Environment	47
305-5	Reduction of GHG emissions	d) 5. Environment	47

DIGITISATION AND INNOVATION

GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
418-1	Substantiated claims regarding customer privacy breaches and loss of customer data	7. Corporate governance and regulatory compliance	81

WASTE MANAGEMENT AND CIRCULAR ECONOMY

GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
306-2	Managing of significant impacts regarding waste	a) 5. Environment b) 5. Environment	48
306-3	Waste generated	a) 5. Environment b) 5. Environment	48

USE OF RESOURCES (FOOD, MATERIALS...)

GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
301-1	Materials used by weight and volume	5. Environment	48
304-1	Operational centres in owned, leased or managed property, located within or adjacent to protected areas or areas of high biodiversity value	Not applicable There are no operational centres owned by the Group adjacent to protected areas	

BUSINESS ETHICS AND GOVERNANCE

GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
201-1	Direct economic value generated and distributed	a) 6. Our contribution to society a) KPIs 2023	68,93
201-2	Financial implications and other risks and opportunities arising from climate change	a) Risks - 5. Environment	24,43,44,49
201-4	Financial assistance received from the government	KPIs 2023 CIRSA has not received any amounts associated with public grants	93
203-1	Investments in supported infrastructure and services	a) 6. Social: Our contribution to society b) 6. Social: Our contribution to society	68,69

GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
203-1	Investments in infrastructure and supported services	a) 6. Social: Our contribution to society b) 6. Social: Our contribution to society	68,69
203-2	Significant indirect economic impacts	a) 6. Social: Our contribution to society	68,69
204-1	Proportion of spend on local suppliers	a) 7. Corporate governance and regulatory compliance	83,84
206-1	Legal actions related to unfair competition and monopolistic practices or practices against free competition	There were no claims for unfair competition, monopolistic practices or practices against free competition in 2023	
207-4	Reporting country by country (Version 2019): with regard to the following sections: a, b.i, b.ii, b.iii, b.vi, b.viii, c	a) 6. Social: Our contribution to society b) iii 6. Social: The CIRSA team b) KPI's 2023 b) ix KPI's 2023	53,54,69,93
308-1	New suppliers that have passed through evaluation and selection filters in accordance with environmental criteria	a) 7. Corporate governance and regulatory compliance	83,84
308-2	Negative environmental impacts in the supply chain and actions taken	a) 7. Corporate governance and regulatory compliance	72
406-1	Cases of discrimination cases and corrective actions taken	There were no cases of discrimination in the 2022 fiscal year	
408-1	Operations and suppliers where there are a significant risk of cases of child labour	a) 7. Corporate governance and regulatory compliance Code of Ethics and Code of Conduct	83,84,85
409-1	Operations and suppliers where there is a significant risk of cases of forced labour	a) 7. Corporate governance and regulatory compliance Code of Ethics and Code of Conduct	83,84,85
411-1	Cases of violations of indigenous peoples' rights	Not applicable There are no cases of violations of indigenous peoples' rights, because the Group does not operate in such relevant locations.	
414-1	New suppliers that have passed through evaluation and selection filters in accordance with social criteria	a) 7. Corporate governance and regulatory compliance	83,84
415-1	Contributions to political parties and/or representatives	Not applicable The Group does not make contributions to political parties and/or representatives	
419-1	Non-compliance with laws and regulations in the social and economic environments	a) 7. Corporate governance and regulatory compliance	72,85

RELATIONSHIP WITH CONSUMERS			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
416-1	Assessment of health and safety impacts of the categories of products or services	4. Responsible Gaming	39,40

WATER CONSUMPTION AND MANAGEMENT			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
303-5	Water consumption	a) 5. Environment Data are shown in m3, not in Megalitres	45

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		GRI 2-6 (2021)
Organization objectives and strategies	17,18,19	GRI 2-6 (2021)
Main factors and trends that may affect its future evolution	8	GRI 2-6 (2021)
Reporting framework used	94	GRI 1 (2021)
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		GRI 3-2 (2021)
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Management approach, description and results of the policies related to these issues, as well as the main risks related to these issues linked to the group's activities.	43	GRI 3-3 (2021)
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Detailed information on the current and foreseeable effects of the company's activities on the environment and, where applicable, health and safety	43	GRI 3-3 (2021)
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Resources dedicated to the prevention of environmental risks	44	GRI 3-3 (2021)
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		GRI 3-3 (2021)
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		GRI 3-3 (2021)
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		GRI 306-2 (2020)
		GRI 306-3 (2020)
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Consumption of raw materials and measures taken to improve the efficiency of their use	48	GRI 302-1
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		GRI 302-2
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Measures taken to preserve or restore biodiversity	43	GRI 3-3 (2021) GRI 304-3
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Employment		
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Total number and distribution of employment contract types, annual average of permanent contracts, temporary contracts and part-time contracts by sex, age and professional classification	59,60	GRI 2-7 (2021)
Number of dismissals by sex, age and professional classification	57	GRI 3-3 (2021) GRI 401-1
Average salaries and their evolution disaggregated by sex, age and professional classification	57	GRI 3-3 (2021)
Salary gaps, the remuneration of equal or average jobs in society	57	GRI 3-3 (2021) GRI 405-2
Average remuneration of directors and executives, including variable remuneration, allowances, compensation, payment to long-term savings pension systems and any other benefit disaggregated by sex	not reported	
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		GRI 403-9
Measures aimed at facilitating the enjoyment of work-life balance and promoting the co-responsible exercise of these by both parents	65	GRI 3-3 (2021)
		GRI 401-3
Health and safety		
Health and safety conditions at work	56,60,61,66	GRI 3-3 (2021)
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		GRI 403-5 to 403-8
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		GRI 403-10
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Mechanisms and procedures that the company has to promote the involvement of workers in the management of the company, in terms of information, consultation and participation	58,65	GRI 3-3 (2021)
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		GRI 404-1
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Management approach: description and results of the policies related to these issues, as well as the main risks related to these issues linked to the group's activities	65	GRI 3-3 (2021)
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Application of due diligence procedures in matters of human rights and prevention of risks of violation of human rights and, where appropriate, measures to litigate[sic], manage and repair possible abuses committed.	86	GRI 2-23 (2021)
		GRI2-26 (2021)
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		GRI 406-1
Measures implemented for the promotion and compliance with the provisions of the fundamental ILO conventions related to respect for freedom of association and the right to collective bargaining; the elimination of discrimination in employment and occupation; the elimination of forced or compulsory labour; the effective abolition of child labour.	86	GRI 3-3 (2021)
FIGHT AGAINST CORRUPTION AND BRIBERY		
Management approach: description and results of the policies related to these issues, as well as the main risks related to these issues linked to the group's activities	72	GRI 3-3 (2021)
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		GRI 2-26 (2021)
		GRI 3-3 (2021)
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		GRI 2-26 (2021)
		GRI 3-3 (2021)
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		GRI 2-28 (2022)
SOCIETY		
Management approach: description and results of the policies related to these issues, as well as the main risks related to these issues linked to the group's activities	68,69	GRI 3-3 (2022)
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		GRI 204-1
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		GRI 413-1
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		GRI 413-1
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		GRI 201-1

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List of CIRSA consolidated group companies

Company	Activity	Percentage stake 2023	Percentage stake 2022	Company	Activity	Percentage stake 2023	Percentage stake 2022
Ajar, S.A.	Bingos	75%	75%	Flamingo Euromatic-100, S.L.	Operational	51%	51%
Alfematic, S.A.	Operational	75%	50%	Fomento Advenio 1, S.A. DE C.V.	Bingos	100%	100%
Amical Trading, S.L.	Operational	77%	77%	Font Mar, S.L.	Operational	100%	-
Ancon Entertainment, INC.	Casinos	50%	50%	Gaming & Services de Panamá, S.A.	Casinos	100%	100%
Apple Games 2000, S.L.	Operational	50%	50%	Gaming & Services, S.A.C.	Casinos	100%	100%
Apuestas Electrónicas, S.L.	Operational	76%	76%	Garbimatic, S.L.	Operational	75%	50%
Art Joc, S.L.	Operational	100%	-	Gema, S.R.L.	Bingos	100%	100%
Atlantic Pecunia, S.A.R.L.	Casinos	100%	100%	Genper, S. A.J	Operational	100%	100%
Automáticos Manchegos, S.L.	Operational	51%	51%	Giga Game System Operation, S.L.	Operational	100%	100%
Automaticos Maxorata, S.A.	Operational	55%	55%	Global Bingo Corporation, S.A.	Bingos	100%	100%
Automáticos Quintana, S.L.	Operational	50%	50y%	Global Bingo Madrid, S.A.	Bingos	100%	100%
Azivi Horta, S.A.	Bingos	100%	100%	Global Bingo Stars, S.A.	Bingos	100%	100%
Bar Juegos, S.L.	Bingos	100%	100%	Global Casino Technology Corporation, S.A.	Casinos	100%	100%
Barnabing, S.A.	Bingos	100%	100%	Global Game Machine Corporation, S.A.	Operational	100%	100%
Barna-Center, S.A.	Operational	100%	100%	Global Management Tangier, S.R.L.	Casinos	100%	100%
Bema - Euromatic, S.A.	Operational	61%	61%	Global Real State, S.A.S.	Casinos	100%	100%
Bet On Red Digital, S.A.	betting	100%	100%	Gogoal, S.R.L.	Betting	60%	60%
Bicondal, S.A.	Bingos	100%	100%	Goldenplay, S.L.	Operational	51%	51%
Billares Valencia, S.L.	Operational	100%	100%	Gran Casino Costa Brava, S.L.	Casinos	90%	90%
Binale, S.A.	Bingos	100%	100%	Gran Casino de las Palmas, S.A.	Casinos	51%	51%
Bincamex, S.A. de C.V.	Bingos	100%	100%	Grasplai, S.A.	Bingos	100%	100%
Bincano, S.A.	Bingos	100%	100%	Grevaloflal, S.A.	Bingos	100%	100%
Bingo Santven, S.A.	Bingos	100%	100%	Grupo Cirsa De Costa Rica, S.A.	Casinos	100%	100%
Bingo Vic, S.A.	Bingos	100%	-	Haes, S.A.	Bingos	100%	100%
Bingos Andaluces, S.A.	Bingos	100%	100%	Iber Matic Games, S.L.	Operational	76%	76%
Bingos Benidorm, S.A.	Bingos	100%	100%	Integración Inmobiliaria World de Mexico, S.A. De C.V.	Bingos	100%	100%
Bingos de Madrid Reunidos, S.A.	Bingos	100%	100%	International Bingo Technology, S.A.	Bingos	100%	100%
Bis Line, S.L.	Operational	88%	88%	International Mex Business, S.L.	Bingos	100%	100%
Blanes Slot, S.L.	Operational	100%	-	Interplay, S.A.	Operational	76%	76%
Calpe Leisure, S.A.	Operational	85%	85%	Interservi, S.A.	Operational	51%	51%
Casino CIRSA Valencia, S.A.	Casinos	100%	100%	Inversiones Interactivas, S.A.	Casinos	70%	70%
Casino Management, S.A.R.L.	Casinos	75%	75%	Inversiones Pacanoas, S.A.	Casinos	70%	70%
Casino Nueva Andalucía Marbella, S.A.	Casinos	100%	100%	Inversiones Pañanitas, S.A.	Casinos	70%	70%
Casinos del Caribe, S.R.L.	Casinos	100%	100%	Inversiones Vertiago, S.A.	Casinos	70%	70%
Cat Games, S.L.	Operational	60%	60%	Inversiones Zental, S.L.	Bingos	100%	100%
CIRSA Enterprises, S.A.	Structure	100%	100%	Investment & Securities Iberica, S.A.	Casinos	100%	100%
CIRSA Finance International, S.A.R.L.U.	Structure	100%	100%	Isi Bet Pro, S.R.L.	Betting	55%	-
CIRSA Gaming Corporation, S.A.	Structure	100%	100%	Jamaica 2001, S.R.L.	Operational	100%	-
CIRSA Interactive Corporation, S.L.	B2B	100%	100%	Juegomatic, S.A.	Operational	100%	100%
CIRSA Intenational Business Corporation,	Casinos	100%	100%	Juegos De Azar Oliva Rodon, S.L.	Operational	100%	100%
CIRSA Italia Holding, S.P.A.	Operational	100%	100%	Juegos Del Oeste, S.L.	Operational	76%	76%
CIRSA Italia, S.P.A.	Operational	100%	100%	La Barra Ancon, S.A.	Casinos	50%	50%
CIRSA Morocco, S.L.	Casinos	100%	100%	La Barra Panama, S.A.	Casinos	100%	100%
CIRSA Servicios Corporativos, S.L.	Structure	100%	100%	Les Loisirs Du Paradis, S.A.R.L.	Casinos	82%	82%
CIRSA Slot Corporation, S.A.	Operational	100%	100%	L&G Bussines, S.L.	Operational	100%	100%
CIRSA Retail, S.R.L.	Bingos	100%	100%	Lista Azul, S.A.	Bingos	100%	100%
CIRSA Tecnologias de la Información, S.L.	Structure	100%	100%	Macrojuegos, S.A.	Bingos	51%	51%
Cirsagest, S.P.A.	Operational	100%	100%	Majestic 507 Corp, S.A.	Casinos	50%	50%
Club Privado De Fumadores Nuestro Espacio	Bingos	100%	100%	Maquilleiro, S.L.	Operational	100%	100%
Coin Machines, S.A.	Operational	100%	100%	Maqui-Ter, S.A.	Operational	100%	51%
Coinland, S.A.	Operational	100%	100%	Marchamatic Indalo, S.L.	Operational	51%	51%
Comdibal 2000, S. L.	B2B	100%	100%	Mepe, S.A.	Operational	100%	-
Comercial de Desarrollos Electrónicos, S. A.	Operational	100%	100%	Merengue Bar Gran Casino Jaragua, GCJ, S.R.L.	Casinos	100%	100%
Comercial de Recreativos Salamanca, S.A.	Operational	76%	76%	Micri Communication, S.R.L.	Betting	70%	-
Comercial Jupama, S.A.	Operational	50%	50%	Miky, S.L.	Operational	100%	100%
Corporación Turística David, S.A.	Casinos	60%	-	Modena Giochi Giuliani, S.R.L.	Operational	100%	-
Diamonds Games, S.l.	Operational	76%	-	Montri, S.A.	Operational	76%	76%
Digital Gaming México, S.A.P.I.de C.V.	Betting	100%	100%	New Laomar, S.L.	Operational	51%	51%
Egaming Solutions, SRL	Betting	60%	-	New Retail, S.R.L.	Operational	100%	-
Egartronic, S.A.	Operational	76%	76%	New York Game, S.L.	Operational	100%	100%
Electrónicos Radisa, S.L.	Operational	100%	100%	Nightfall Construccions, S.R.L.	Casinos	100%	100%
Eleval, Electronicos Valencia, S.A.	Operational	100%	100%	Oper Ibiza, S.L.	Operational	51%	51%
E-Play 24 Ita Limited	Betting	60%	60%	Operadora de Entretenimiento Manzanillo, S.A. de C.V.	Casinos	100%	60%
E-Play 24 Italia, S.R.L.	Betting	60%	60%	Operadora de Juegos y Sorteos Paseo Central, S.A. de CV	Casinos	100%	-
E-Play 24 Retail, S.R.L.	Betting	60%	60%	Operadora General De Entretenimiento, S.A. DE C.V.	Betting	100%	100%

Company	Activity	Percentage stake 2023	Percentage stake 2022
Operadora Internacional de Recreativos, S.A.	Operational	51%	51%
Orbis Development, S.A.	Casinos	100%	100%
Orlando Italia, S.R.l.	Operational	51%	51%
Orlando Play, S.A.	Operational	51%	51%
Palabingo, S.R.L.	Bingos	100%	100%
Perselli Video Giochi, S.R.L.	Operational	100%	-
Piscis 28 Castilla y León, S.L.	Operational	100%	100%
Playcat, S.A.	Bingos	100%	100%
Princesa 31, S.A.	Bingos	100%	100%
Promociones e Inversiones de Guerrero, S.A.P.I. de C.V.	Bingos	100%	100%
Promociones Sol Ibiza, S.A.	Operational	51%	51%
Radiamon, S.L.	Operational	51%	51%
Reactive Games Software Solutions Limited	Betting	60%	60%
Recrea, S.L.	Operational	80%	80%
Recreativos Arranz, S.L.	Operational	100%	100%
Recrativos Galicia - Sanabria, S.L.	Operational	100%	100%
Recreativos Hatuey, S.A.	Operational	100%	100%
Recreativos Manchegos, S.L.	Operational	51%	51%
Recreativos Ociomar Levante, S.L.	Operational	51%	51%
Recreativos Panaemi, S.L.	Operational	51%	51%
Recreativos Perseo, S.L.	Operational	100%	-
Recreativos Valle de Aran, S.L.	Operational	100%	-
Recreativos Xativa, S.A.	Operational	55%	55%
Red de salones de Aragón, S.L.	B2B	100%	100%
Resort Paradise AB	Casinos	82%	82%
Romgar, S.L.	Bingos	100%	100%
S.A. Explotadora de Recreativos	Operational	90%	90%
Sadeju, S.L.	Bingos	65%	65%
Sala Valencia, S.A.	Bingos	100%	100%
Sala Versalles, S.A.	Bingos	100%	100%
Santbar, S.l.	Operational	100%	-
Saturno 5 Conexión, S.L.	Operational	100%	100%
SCB Almirante Dominicana, S.R.L	Casinos	100%	100%
SCB Anil Dominicana, S.R.L.	Casinos	100%	100%
SCB Grand Victoria Dominicana, SRL	Casinos	100%	100%
SCB Hispaniola Dominicana, S.R.L.	Casinos	100%	100%
SCB Malecon Dominicana, S.A.	Casinos	100%	100%
Sertebi, S.A.	Bingos	100%	100%
Servi D´Aro, S.A.	Bingos	100%	100%
Servi-Joc, S.A.	Operational	85%	85%
Servinet, S.L.	Operational	100%	-
Sobima, S.A.	Bingos	100%	100%
Societe Du Casino Le Mirage, S.A.	Casinos	51%	51%
Sodemar, S.L.	Bingos	100%	100%
Space Go Game Studio, S.L.	Betting	100%	100%
Sportium Apostes Catalunya, S.A.	Betting	100%	100%
Sportium Apuestas Andalucia, S.L.	Betting	100%	100%
Sportium Apuestas Aragon, S.L.	Betting	100%	100%
Sportium Apuestas Asturias, S.A.	Betting	100%	100%
Sportium Apuestas Baleares, S.L.	Betting	100%	100%
Sportium Apuestas Canarias, S.L.	Betting	100%	100%
Sportium Apuestas Castilla La Mancha, S.L.	Betting	100%	100%
Sportium Apuestas Ceuta, S.L.	Betting	100%	100%
Sportium Apuestas Colombia, S.A.S.	Betting	50%	50%
Sportium Apuestas Deportivas, S.A.	Betting	100%	100%
Sportium Apuestas Digital, S.A.	Betting	100%	100%
Sportium Apuestas Galicia, S.L.	Betting	100%	100%
Sportium Apuestas Levante, S.A.	Betting	100%	100%
Sportium Apuestas Melilla, S.L.	Betting	100%	100%
Sportium Apuestas Navarra, S.A.	Betting	100%	100%
Sportium Apuestas Oeste, S.A.	Betting	100%	100%
Sportium Apuestas Panama, S.A.	Betting	100%	100%
Sportium Dominicana, SRL	Betting	100%	100%
Sportium Global Investments, SGI, S.A.	Betting	100%	100%
Sportium Portugal, SA	Betting	100%	100%
Sportium Puerto Rico, LLC	Betting	55%	55%

Company	Activity	Percentage stake 2023	Percentage stake 2022
Sportium Servicios de Gestión, S.L.	Betting	100%	100%
Sportium Zona Norte, S.A.	Betting	100%	100%
Star Games Balear, S.L.	Operational	76%	-
Talluntxe, S.A.	Bingos	100%	100%
Talzen Inversions, S.L.	Bingos	100%	100%
Tecnijoc, S.L.	Operational	76%	76%
Tecnoappel, S.L.	Operational	76%	76%
Tecnologia y Sistemas, S.A.	Operational	100%	100%
Tefle, S.A.	Bingos	100%	100%
Telma Enea, S.L.	Bingos	100%	100%
Teo Servicios Corporativos Slots, S.L.	Operational	100%	100%
Thousand And One Nights, AB	Casinos	75%	75%
Tres Rios Hotel la Carpintera, S.A.	Casinos	100%	100%
Unidesa Operations Services, S.l.	B2B	100%	100%
Uniplay, S.A.	Operational	100%	100%
Universal de Desarrollos Electrónicos, S. A.	B2B	100%	100%
Urban Leisure, S.L.	Operational	75%	75%
Verneda 90, S.A.	Bingos	100%	100%
Winner Group, S.A.	Casinos	50%	50%
Yellow City Limited	Betting	60%	60%
Yumbo San Fernando, S.A.	Bingos	100%	100%

List of associated companies

Company	Activity	Percentage stake 2023	Percentage stake 2022
AOG, S.r.l.	Bingos	50%	50%
Audiovisual Fianzas, S.G.R.	Structure	6%	6%
Binsavo, S. A.	Bingos	50%	50%
Casino la Toja, S.A.	Casinos	50%	50%
Compañia Europea de Salones Recreativos, S.L.	B2B	20%	20%
Competiciones Deportivas, S.A.	Casinos	50%	50%
Felix Jimenez Morante, S.A.	Operational	50%	50%
Majestic Food Services, S.A.	Casinos	50%	50%
Montecarlo Andalucía, S.L.	Bingos	50%	50%
Opa Services, S.r.l.	Bingos	30%	30%
Recreativos Oropesa, S.L.	Operational	50%	50%
Serdisga 2000, S. L.	B2B	50%	50%
Unión de Operadores Reunidos, S.A.	Operational	50%	50%

Independent Limited Assurance Report on the Consolidated
Non-Financial Statement for the year ended
December 31, 2023

CIRSA ENTERPRISES, S.A. AND SUBSIDIARIES

INDEPENDENT LIMITED ASSURANCE REPORT ON THE CONSOLIDATED NON-FINANCIAL INFORMATION STATEMENT

Translation of a report originally issued in Spanish. In the event of discrepancy,
the Spanish-language version prevails

To the shareholders of CIRSA ENTERPRISES, S.A.:

Pursuant to Article 49 of the Code of Commerce we have performed a verification, with a limited assurance scope, of the accompanying Consolidated Non-Financial Information Statement (hereinafter NFS) for the year ended December 31, 2023, of CIRSA ENTERPRISES, S.A. and subsidiaries (hereinafter the Group) that forms part of the Consolidated Management Report of the Group.

The content of the NFS includes additional information to that required by prevailing mercantile regulations in relation to non-financial information that has not been subject to our verification. In this regard, our assignment has been exclusively limited to the verification of the information shown in the Appendix "Index of contents required by Law 11/2018" included in the accompanying NFS.

Responsibility of the Board of Directors

The preparation of the NFS included in the Consolidated Management Report of the Group, and its content, is the responsibility of the Board of Directors of CIRSA ENTERPRISES, S.A. The NFS has been prepared in accordance with the content required by current mercantile regulations and in conformity with the criteria outlined in the selected *Sustainability Reporting Standards of Global Reporting Initiative (GRI standards)*, as well as other criteria described in accordance with that indicated for each subject in the Appendix "Index of contents required by Law 11/2018" of the mentioned NFS.

The Board of Directors are also responsible for the design, implementation and maintenance of such internal control as they determine as necessary to enable the preparation of an NFS that is free from material misstatement, whether due to fraud or error.

They are further responsible for defining, implementing, adapting and maintaining the management systems from which the information necessary for the preparation of the NFS is obtained.

Our independence and quality management

We have complied with independence and other ethical requirements of the International Code of Ethics for Accounting Professionals (including international independence standards) issued by the International Ethics Standards Board for Accountants (IESBA), which is based on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behavior.

Our Firm applies International Standard on Quality Management 1 (ISQM 1), which requires us to design, implement and operate a system of quality management including policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

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The engagement team consisted of experts in the review of non-financial information and, specifically, information on economic, social, and environmental performance.

Our responsibility

Our responsibility is to express our conclusions in an independent limited assurance report based on the work performed. Our review has been performed in accordance with the requirements established in the current International Standard on Assurance Engagements 3000 "Assurance Engagements Other than Audits or Reviews of Historical Financial Information" (ISAE 3000 Revised) issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC) and the guidelines for verifying Non-Financial Statement, issued by the Spanish Institute of Chartered Accountants (ICJCE).

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained is substantially lower.

Our work consisted in making enquiries of Management and the various Group units participating in the preparation of the NFS, reviewing the process for gathering and validating the information included in the NFS, and applying certain analytical procedures and selective tests by means of sampling as described below:

▶ Meetings with Group personnel to obtain an understanding of the business model, policies and management approaches applied, the main risks related to these matters and obtain the necessary information for our external review.

▶ Analysis of the scope, relevance and integrity of the content included in the NFS for the year 2023 based on the materiality analysis made by the Group and described in section "Materiality assessment and matrix", considering the content required by prevailing mercantile regulations.

▶ Analysis of the processes for gathering and validating the data included in the 2023 Non-Financial Information Statement.

▶ Review of the information on the risks, policies and management approaches applied in relation to the material aspects included in the 2023 NFS.

▶ Check, through tests, based on a selection of a sample, the information related to the content of the 2023 NFS and its correct compilation from the data provided by the information sources.

▶ Obtaining a representation letter from the Board of Directors and Management.

Basis for a qualified conclusion

As explained in Appendix "Index of contents required by Law 11/2018", included in the attached Non-Financial Information Statement, the Statement does not include the disclosures regarding the average remuneration of the Board of directors and executives, including variable salaries, allowances, termination benefits, payments into long-term savings schemes and any other benefits disaggregated by gender, information required by the prevailing mercantile regulations on non-financial information.

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Qualified conclusion

Based on the procedures performed and the evidence obtained, except for the impact of the matter described in the "Basis for a qualified conclusion", no additional matter came to our attention that would lead us to believe that CIRSA ENTERPRISES, S.A. NFS for the year ended December 31, 2023 has not been prepared, in all material respects, in accordance with the contents required by current commercial regulation and the criteria of the selected GRI standards, as well as other criteria, described as explained for each subject matter in the Appendix "Index of contents required by Law 11/2018" of the aforementioned NFS.

Use and distribution

This report has been prepared as required by current mercantile regulation in Spain, thus it may not be suitable for any other purpose or jurisdiction.

ERNST & YOUNG, S.L.

(Signature on the original in Spanish)

_____
Antonio Capella Elizalde

March 19th, 2024

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