

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

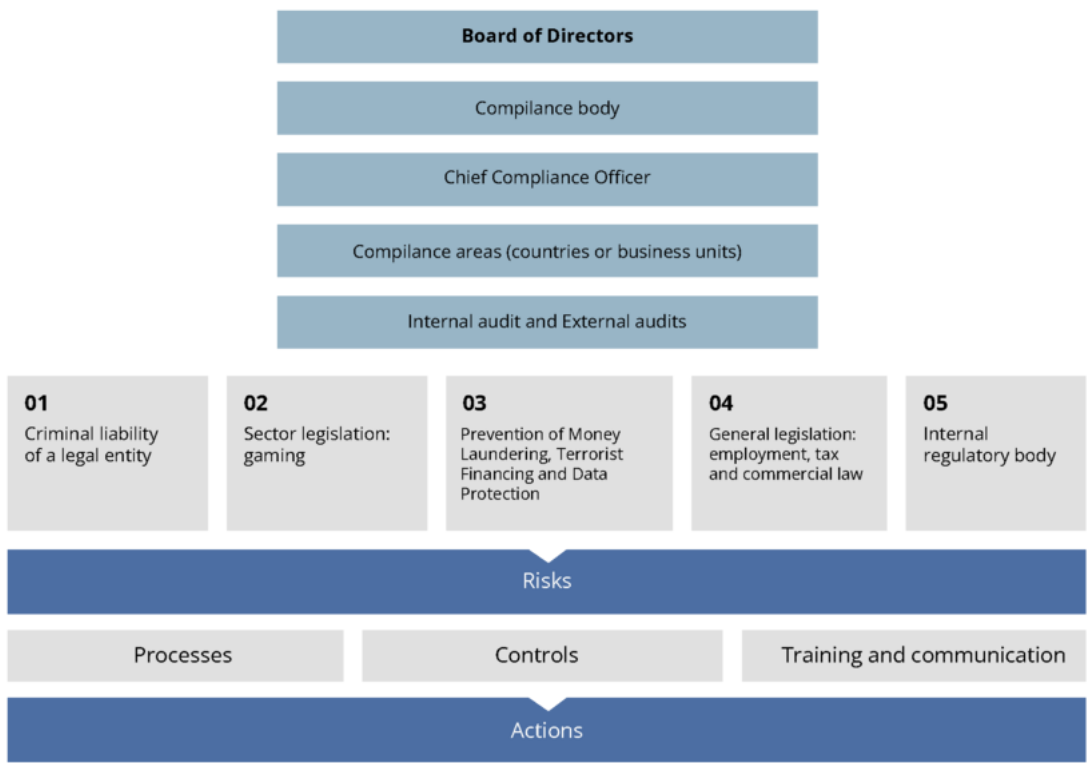
Our **third-party approval processes**, which guarantee that not only our operations comply with our ethical values, but also our supply chain and business partners, among others.

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).

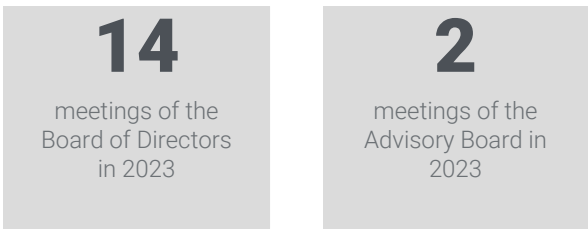
The Board of Directors is made up of **4 members**, 2 proprietary directors representing the shareholder and 2 executive directors of CIRSA. The 2 executive directors of CIRSA are Joaquim Agut and Antonio Hostench.

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.



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.

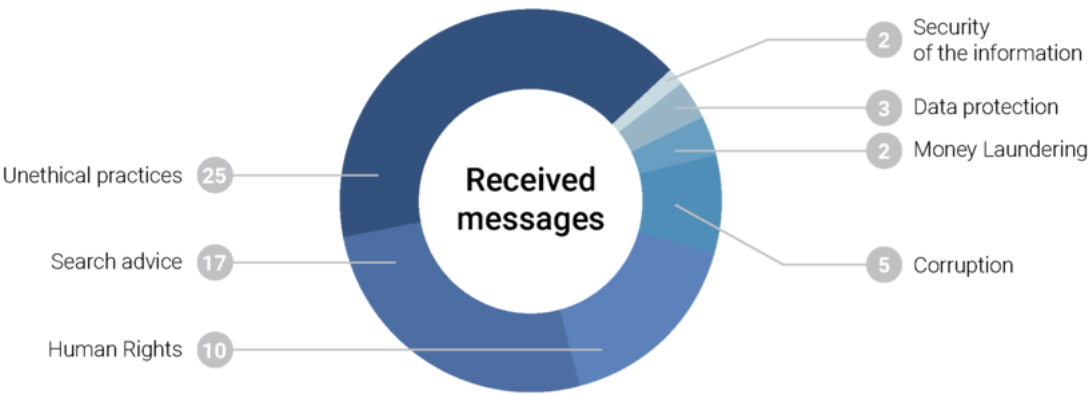


ETHICS LINE CHANNEL

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.



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.

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.

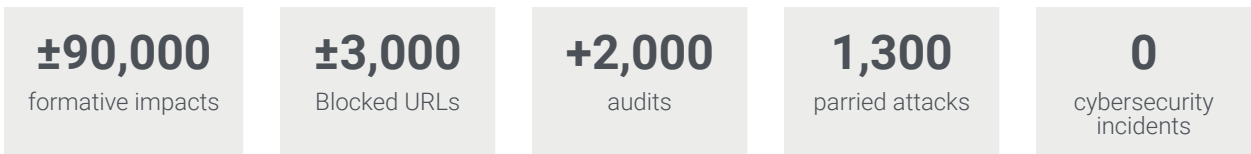
The programme has **four main objectives**:

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

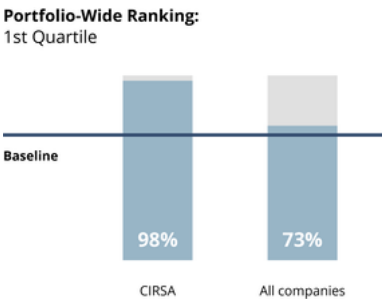
In this regard, the cybersecurity measures we have implemented cover several fundamental aspects to ensure the strictest control. All these measures are complemented by **carrying out drills and exercises to prepare for adverse situations**.

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.

In 2023, the following have been carried out:



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



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.

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.

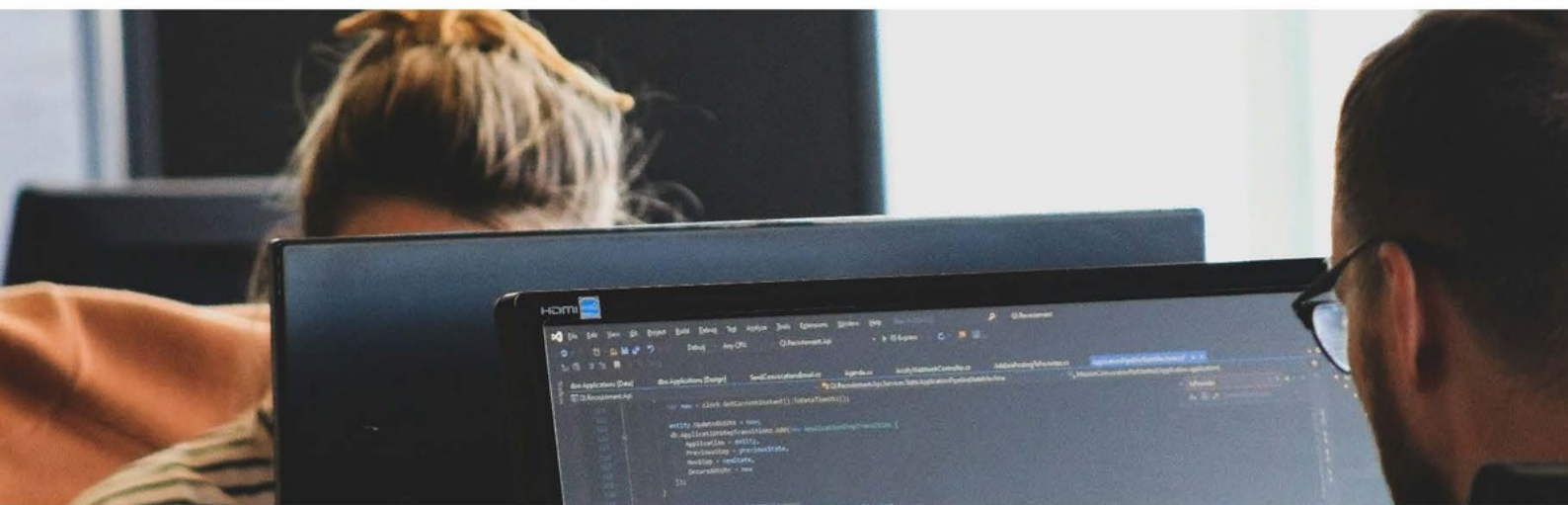
In 2023 regarding matters of privacy, there have been zero data breaches and 0% of customer data has been used for secondary purposes.

0

security breaches

0%

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.



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.

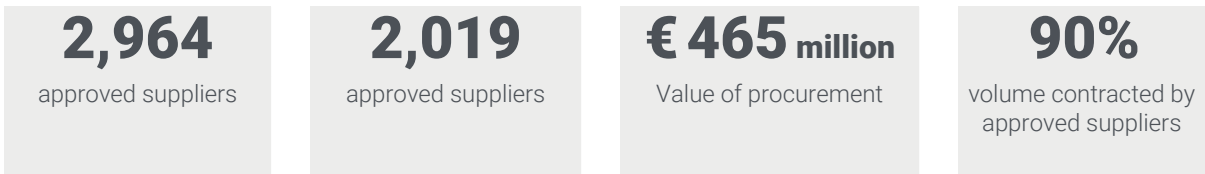
With the approval of our suppliers, we activate **a due diligence mechanism that consists of collecting and safeguarding the supplier's ESG information**. Through the approval forms we confirm that the supplier **takes into account social, environmental and Gender Equality aspects in its organisation 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.*



(*) 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 take 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.

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 Labour 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.

