

Fiscal Policy

July 18, 2024



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1. Introduction

CIRSA is an international group that operates in the leisure and entertainment sector with a comprehensive gaming offer in a modern, innovative and responsible environment. The CIRSA Group is an organization committed to society that, among other aspects, contributes to the support and development of the countries in which it is present through the taxes it pays there. Compliance with current legislation constitutes, on the other hand, one of the values and principles of action of the Group.

In this context, the Board of Directors of Cirsa Enterprises, S.A. approves the Tax Policy of the CIRSA Group, whose objective is to establish the tax strategy of all the companies that make up the Group, based on the principles of compliance, good faith and cooperation with tax administrations.

2. Goals

The main objectives of the Fiscal Policy of the Cirsa Group are the following:

- Provide a framework of reference for decision-making with significant relevance in the tax field.
- Establish the bases of the supervision and control mechanisms in tax matters.

3. Principles of action

The principles of action in this matter are the following:

- Compliance with tax regulations in all countries in which the Group operates.
- Reasonable application and interpretation of tax regulations, taking into account those business, financial, accounting and legal factors that may affect their application, with the aim of reducing possible areas of uncertainty.
- Contribute to the support of public expenses in the countries in which the Group is present through the payment of taxes established by law.
- Prevent and reduce tax risks in the scope of our activity through adequate analysis and control.
- Periodically report to the Company's Board of Directors on the tax practices followed in the Group and on the existing controls in relation to them. Likewise, report on the tax implications of the main transactions that must be approved by the same.

4. Good tax practices

Based on the above principles, the companies that make up the Group assume the following good tax practices:

- Do not use artificial corporate structures with the sole purpose of reducing the tax burden or carry out transactions with related entities with the sole purpose of eroding tax bases or transferring profits to low-tax territories.
- Base any operation with tax significance on an economic and business motivation.
- Do not establish or acquire companies resident in countries or territories that Spanish legislation considers to be non-cooperative jurisdictions or harmful tax regimes, unless there are legitimate economic or operational reasons and never with the aim of reducing the tax burden.
- Value transactions between related entities at market price.
- Ensure compliance with tax obligations, in particular, the presentation of tax returns within the period and in the manner legally established in the countries in which the Group carries out its economic activity.
- Respond to requests for information and documentation requested by the Tax Administrations within the required deadlines and scope, as well as duly collaborate in the inspection procedures in which the Group companies may be immersed, without prejudice to the legitimate defense of their interests in case of controversy.
- Make the main tax figures of the Group available to stakeholders.

5. Responsibilities

The Tax Policy is applicable to all subsidiaries and entities of the Group, as well as to all administrators, directors and employees of the Group, who must follow the principles and good practices established therein in their actions.

The Group will adopt the necessary control mechanisms and will dedicate sufficient and appropriately qualified human and material resources to ensure, in coordination with its business strategy and management, compliance with tax regulations and the principles and good practices established in this Policy.

Without prejudice to this, the execution and monitoring of the Tax Policy corresponds, within the scope of its powers, to the Group's tax area together with the Group's tax managers in each of the jurisdictions in which it operates. It will be the unit to which the rest of the employees, managers and areas must contact in case of issues on the matter.

6. Approval, validity and dissemination

This Policy has been approved by the Board of Directors of Cirsa Enterprises, S.A. at its meeting of 18 July 2024. Without prejudice to the monitoring of its substantial principles prior to said date, it will be applicable from its communication once approved. The aforementioned Board of Directors will be the competent body for its modification.

The Policy will be available on the Group's intranet. Likewise, it will be made available to third parties by publishing it on the Cirsa website.