

Stakeholder Engagement Policy
Junio/2025



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1. Introduction

CIRSA is an international Group operating in the leisure and entertainment sector with a comprehensive offering of gaming in a modern, innovative and responsible environment. The CIRSA Group recognises the importance of all stakeholders in their success and is committed to building strong and lasting relationships with them. This policy defines the overall framework for identifying, understanding and managing relationships with our stakeholders, aligned with sustainability principles and shared value creation.

2. Definition of Stakeholders

CIRSA stakeholders are considered to be all those persons, organisations or entities that have a legitimate interest in the company's activities, including: shareholders, employees, customers, suppliers, local communities, government, non-governmental organisations (NGOs), media and competitors.

3. Guiding principles

CIRSA's Stakeholder Engagement Policy is based on the following principles:

- **Transparency:** communicate relevant information clearly and in a timely manner to all stakeholders.
- **Dialogue:** foster open and constructive dialogue with all stakeholders.
- **Respect:** treat all stakeholders with respect and fairness.
- **Accountability:** take responsibility for decisions and actions that affect stakeholders.
- **Sustainability:** incorporate sustainability into all company decisions and operations.
- **Good Corporate Governance:** identify, analyse and adopt the best practices, principles and recommendations in relation to it.
- **Continuous improvement:** periodic review of mechanisms to ensure an effective stakeholder engagement strategy.

4. Scope of application

It applies to all subsidiaries and entities of the Group, as well as to all directors, managers and employees of the Group, who must follow the principles and good practices established therein in their actions.

5. Responsibilities

The Group will adopt the precise control mechanisms and devote sufficient and suitably qualified human and material resources to ensure, in coordination with its strategy and business management, compliance with this policy.

6. Communication channels and double materiality

At CIRSA we establish and maintain various communication channels to facilitate dialogue with stakeholders, including: regular meetings, surveys, sustainability reports, social media and customer service hotlines. Furthermore, on a regular basis, within the scope of double materiality analysis, we identify the most relevant aspects for stakeholders and for the financial performance of the company.

Once identified, they are classified and prioritised to develop the relationship strategy and dialogue tools with each of them.

7. Decision making process

Stakeholder perspectives will be considered in all strategic company decisions through double materiality analysis, impact assessment, and consultation with stakeholders when necessary. In this way, we set our goals, define the sustainability action plan and assess our responsiveness to society's expectations.

8. Commitment to specific stakeholders

- Investors: facilitating access to relevant information, organising regular meetings and encouraging transparent communication.
- Employees: fostering a safe and healthy work environment, offering opportunities for professional development and promoting equality, diversity and inclusion.
- Customers: delivering quality products and services, ensuring customer satisfaction and efficiently managing complaints and grievances, providing a safe environment under the strictest responsible gaming processes.
- Suppliers: establishing long-term relationships with ethical and responsible suppliers, promoting fair and transparent business practices, and fostering innovation.
- Local communities: contributing to the economic and social development of the communities where it operates, minimising the environmental impact of its operations and participating in community initiatives.
- Government: complying with all applicable laws and regulations and collaborating with government authorities on initiatives of common interest, only operating in regulated markets.
- NGOs: collaborating with NGOs on projects of common interest.
- Media: maintaining an open and transparent relationship with the media and providing accurate and timely information.
- Competitors: monitoring competitor practices and seeking opportunities for collaboration on topics of common interest.

9. Approval, effectiveness and dissemination

The Stakeholder Engagement Policy has been approved by the Board of Directors of CIRSA Enterprises, S.A. at its meeting on 18 Junio 2025 and enters into force on the date of its approval.

Its content will be subject to periodic review where appropriate in order to adapt it to regulatory changes or incorporate best practices in the matter. The aforementioned Board of Directors will be the competent body to amend it, after supervision by the Sustainability, Technology and Innovation Committee.

The Policy will be available on the Group intranet. It will also be made available to third parties via the CIRSA website.

The Spanish version of this document will prevail in the event of any discrepancy or dispute.

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