



# Responsible Gaming

We want long-term sustainable relationships with our customers

# Goal and strategy



We understand that Responsible Gaming involves making conscious and well-informed decisions, with the sole purpose of seeking entertainment. Gambling should not be used as a way to solve financial or emotional problems. At CIRSA, we are committed to ensuring the safety and well-being of our customers. Therefore, we constantly strive to meet the highest standards of Responsible Gaming. By fostering **a safe and transparent gaming environment**, we help our customers enjoy a responsible and rewarding leisure experience.

Gaming can be a social activity that enriches our relationships and allows us to share enjoyable moments with others. However, we are aware that a minority of customers may experience difficulties related to gaming. We believe it is essential to adopt a comprehensive approach that encompasses both land-based and online gaming. In this way, we can ensure that all our customers enjoy a safe and responsible gaming experience.

*The sustainability of our business is based on promoting responsible and safe gaming, which involves both protecting our customers and training our employees to promote healthy gaming practices.*

**Our principles:**

<p><b>1. Compliance with the standard</b></p>	<p><b>2. Promotion of a culture of Responsible Gaming</b></p>	<p><b>3. Transparency in information and communication</b></p>	<p><b>4. Responsible advertising</b></p>
<p>We ensure that all gaming activities are conducted in accordance with the laws and regulations in force in each jurisdiction.</p>	<p>We design campaigns and preventative actions that help raise awareness about the risks of problem gambling among employees, customers and society in general.</p>	<p>We provide clear, accurate and accessible information about our entire gaming offering, the risks of the activity and the prevention and assistance measures available.</p>	<p>We ensure that gambling advertising and promotions do not encourage irresponsible or deceptive behavior, and we prevent them from targeting vulnerable groups.</p>
<p><b>5. Prevention of problem gambling</b></p>	<p><b>6. Protection of vulnerable groups</b></p>	<p><b>7. Support for users in risky situations</b></p>	<p><b>8. Continuous improvement of our Responsible Gaming strategy</b></p>
<p>We systematically identify and anticipate situations that may lead to problematic gambling, investigate abnormal behaviors, and adapt actions according to type and environment.</p>	<p>We establish mechanisms to protect the most vulnerable groups, such as minors and people with a history of gambling problems.</p>	<p>We collaborate with administrations and institutions to design prevention programs and offer guidance to those who have difficulties with gambling.</p>	<p>We adapt to advances in research and technology, regulatory changes and best practices in the industry, which guarantees our recognized excellence in management.</p>

# Actions and results

## Our actions:

1. Responsible Gaming Committee	2. At CIRSA We are Responsible Gaming	3. Training for our employees
4. Certifications and Accreditations in Responsible Gaming	5. AI technology applied to prevention	6. Active collaboration with entities in the field of research and treatment of pathological gambling

### 1. Responsible Gaming Committee

The Corporate Responsible Gaming Committee, led by the company's Chief Executive Officer and comprised of the heads of the different business lines, as well as the People and Talent, Legal, Communications, and ESG functions, is **responsible for validating the policies, strategy, and actions related to Responsible Gaming**. The committee has been working specifically on the following projects during 2025:

- Definition of the KPIs for monitoring the new protocols for action in the gaming hall
- Implementation of the responsible gaming app in Italy
- Compliance with Responsible Gaming training in all countries
- Certifications and accreditations in Responsible Gaming
- Monitoring the results of internal audits carried out during the year

### 2. At CIRSA, We are Responsible Gaming

With the aim of promoting responsible gaming, we have continued our '**At CIRSA We Are Responsible Gaming**' campaign across all our facilities. This plan, tailored to the needs of our customers and partners, includes personalized messages that encourage a safe and responsible gaming experience.

In all our gaming halls, we provide our customers with readily available and visible advice on responsible gaming through brochures, information screens and panels, as well as **self-assessment tests** and specific signage **prohibiting access to our gaming halls for those under 18**. We have also implemented the use of QR codes to make our recommendations more accessible.

New communication elements implemented in our gaming halls:

Employee campaign flyers



Young-adult campaign



Client campaign brochure



Information at reception



### 3. Training for our employees

We remain committed to ensuring the ongoing training of all our gaming halls staff in Responsible Gaming. In this regard, we have fully met our internally set objectives, guaranteeing that in every country where we operate, we have a team properly trained to manage this area. Our gaming halls staff have received Responsible Gaming training, acquiring all the necessary skills to perform their duties.



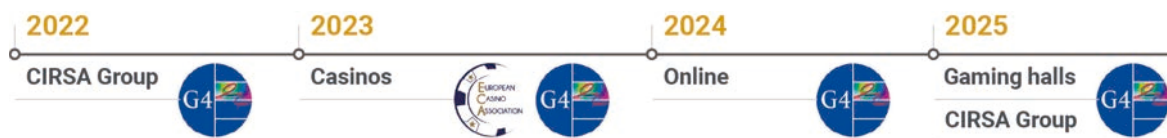
(\*) Staff included mostly from professional categories 4 (indirect gaming halls) and 5 (direct gaming halls)

**Our dedicated Responsible Gaming Officer** in each of our gaming halls ensures the proper implementation of actions in this area and adherence to our on-site operating protocols.

### 4. Certifications and accreditations

#### a) Certification of business units by independent third-party entities

In 2022, we began the certification process for our Responsible Gaming policies and action plans with the international certification body **Global Gambling Guidance Group (G4)**. In 2025, we renewed our certification for casinos in Spain, the group's overall certification for our corporate responsible gaming policies and actions, and the certification for our gaming venues in Spain.



These certifications demonstrate:

- Our firm commitment to policies and action plans on Responsible Gaming
- Our commitment to society, understanding people beyond their role as customers or consumers
- Our tireless work to ensure that gaming remains part of entertainment, always defending the culture of Responsible Gaming through communication campaigns prepared exclusively for them

### b) Responsible Gaming Accreditation in the bars and restaurants Sector

The operation of slots machines in hospitality establishments represents a fundamental asset for our company. For this reason, and as part of our promotion of a Responsible Gaming culture in the sector, CIRSA and other leading gaming companies in Spain, together with COFAR (Spanish Confederation of Recreational Gaming Entrepreneurs in Hospitality), defined an accreditation program to ensure that the bar and restaurant sector implements personalized preventive and proactive measures to guarantee safer gaming.

# 15,657

establishments  
accredited in 2025

# 96%

over total  
establishments

Establishments accredited by this program publicly demonstrate their commitment to offering safe gaming products and ensuring that the activity is carried out under strict regulatory compliance.

During this year 2025, the deployment of the COFAR Responsible Gaming 4.0 APP among all our customers by our commercial network has continued, a natural evolution of the accreditation program in digital format and which allows them to keep them **continuously trained** in Responsible Gaming.

Likewise, the adaptation of the App for the Italian market has begun.



## 5. AI Technology

Artificial Intelligence offers new opportunities for the gaming sector. For years, at CIRSA, we have been leveraging these tools to move towards a present and future where Responsible Gaming is a priority and customers are better protected.

### a) AI applied to the online channel

It is clear that the world of online gaming will continue to gain popularity in the near future as technological developments facilitate a more attractive experience. Therefore, we want to guarantee safe online gaming so that customers can fully enjoy their experience.

To achieve this goal, **we apply AI technologies**, using the predictive computational model known as a “supervised artificial neural network” to monitor, detect, and profile our customers exclusively for prevention purposes. This allows us to protect them by identifying potential signs of problem gambling.

The control mechanisms are based on a matrix that includes 25 key indicators that refer to different elements present in the user's gaming transactions.

The system monitors different parameters:

- **Frequency/Time:** Customer time spent on gaming-related activities. This includes, among other things, their days of activity, time between deposits, average time between logins, etc
- **Activity/volume:** playing style, betting amounts and casino gaming sessions of the client, as well as weekly deposits, withdrawals, among others
- **Financial:** monetary amounts dedicated to the activity. This includes, for example: total deposits, weekly average, number of logins where the balance reached zero, etc.
- **Other factors:** additional qualitative factors. For example, whether they are of an at-risk age (young adults), use a mobile phone, or have been previously excluded (have acknowledged having a problem at some point)

In addition, it offers weekly reports that allow us to identify risky gaming patterns.

If we detect that our customers begin to show undesirable behavior regarding the activity, we communicate with them through four phases, through which, in addition to offering them tools that allow them to control it, we can go as far as the temporary suspension of the account.

# 474

risk situations proactively detected through monitoring systems

### Self-Exclusion reinforcement

Fostering a culture of Responsible Gaming relies heavily on empowering our customers. In line with this commitment, we want each customer to be able to tailor their gaming experience to their individual circumstances. For example, in 2025, 4,168 customers set betting limits. Furthermore, we manage a self-exclusion program that allows customers to stop gambling whenever they choose.

# 4,168

customers set betting limits in 2025

# 56,969

self-exclusions in the online gaming

### b) AI applied to the offline / retail channel

During 2025, we began implementing the adaptation of the online model to retail. The control mechanisms are based on a matrix that includes 20 key indicators, each referring to different elements present in the user's gaming activity. The system monitors various parameters such as frequency, gaming volume, and other factors, generating an alert that is sent to the point of sale for follow-up, implementing the defined action protocol.

## 6. Collaboration with entities

### a) Research collaboration agreement between the Universitat Autònoma de Barcelona and CIRSA

In 2023 we signed a collaboration agreement with **Universitat Autònoma de Barcelona** in order to promote research in the field of gambling, sports betting, addictions and associated psychosocial processes.

Universitat Autònoma de Barcelona is a prestigious institution that provides high-quality, diverse, multidisciplinary and flexible teaching, tailored to the needs of society and adapted to the new models of the European knowledge economy, with interest and sensitivity towards the reality that surrounds it.



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



The agreement consists of four phases, **the first two of which have already been completed**. The objectives of this agreement are:

- Conduct applied research in the social sciences on recreational games, gambling, sports betting, gambling practices, addictions, and associated psychosocial processes
- To promote the reciprocal exchange of information on research topics, publications and other materials of interest
- To enhance 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 the exchange of experiences on all those topics that may benefit these institutions

### b) Collaboration in the treatment of pathological gambling

- Since 2016, we have been working closely with **ACENCAS** (Asociación Centro Catalán de Adicciones Sociales), dedicated not only to helping those suffering from gambling-related harm, but also their close circle. This year, we also began our collaboration with the **Observatori de Prevenció Activa**, which aims to combat emerging social addictions through research, data analysis, and the creation of resources for professionals, families, and educational institutions.
- Since 2023, we have collaborated with **FEJAR** (Spanish Federation of Recovered Gamblers), which shares the common interest of promoting active policies and principles of Responsible Gaming. This agreement allows us, among other things, to support and participate in Responsible Gaming initiatives, as well as to include information about the free helpline for problem gambling in our Responsible Gaming brochures.



### c) Members of the Responsible Gaming Advisory Council (CAJR)

Forum that advises the Directorate General for Gaming Regulation (DGOJ), a direct body of the Ministry of Social Rights, Consumer Affairs and Agenda 2030, in which **experts of recognized prestige** and experience from the different sectors that are linked to gambling and Responsible Gaming participate.