

NOVOMATIC AG

CODE OF CONDUCT | EN



NOVOMATIC AG

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Dear employees,

Since its foundation in 1980, NOVOMATIC AG has established an excellent reputation across the globe. Innovation, products and services of the highest quality, reliability and an international orientation have made NOVOMATIC AG one of the leading gaming technology groups in the world.

As an operator of international gaming venues and technology supplier exporting around the world, we recognize our responsibility to our employees, customers and the society. That is why, aligning our business activities with the group-wide sustainability goals is a top priority.

NOVOMATIC has always had a strong sense of responsibility towards society, in particular the protection of players and young people, as well as compliance with legal requirements in all our business activities. This is what the company will continue to stand for in the future.

Only those who act in an ethical and legally responsible manner can be successful in the long term. The Board of Directors sets high standards for itself and for each individual employee. This corporate culture forms the basis for the trust placed in us. Already individual breaches of the law can cause great damage to NOVOMATIC's reputation. Each and every one of you is therefore obliged to act lawfully and responsibly in accordance with our corporate values **"do – enjoy – respect"**.

This Code of Conduct defines an ethical and legal framework within which we want to operate and continue on our road to success. It is binding for all employees in all companies and business areas as well as for all hierarchical levels of NOVOMATIC. Of particular importance to us is the clear commitment against corruption in all its forms.

We are committed to an inclusive, respectful, compliant and non-discriminatory corporate culture. For this reason, the Code of Conduct, which constitutes a basis of this corporate culture, must be practiced and lived each and every day.

Mag. Johannes Gratzl & Dipl.-Ing. Ryszard Presch

Executive Board of NOVOMATIC AG

Two handwritten signatures in black ink. The first signature is on the left and the second is on the right.



Dear employees,

In the sensitive and highly regulated business area of gaming, it is crucial to comply with ethical standards and legal requirements to ensure the long-term success of our company. Misconduct in these areas can have a damaging effect on our business and jeopardize our reputation and competitiveness. Our commitment to integrity and compliance forms the foundation on which we want to organize our international business activities.

The continuous development of the Group's compliance culture and organization is a key responsibility of the Compliance Committee of NOVOMATIC AG.

In this regard, I'd like to emphasize the importance of our Code of Conduct. This Code of Conduct provides clear guidelines for lawful and ethical behavior for all parties involved. Compliance with this Code is not only an obligation but also a responsibility that we, as NOVOMATIC, bear as a whole.

I invite you to actively participate in our efforts and support us in shaping and ensuring a sustainable, ethical, and responsible compliance culture within the NOVOMATIC AG Group.

Kind regards,

A handwritten signature in black ink, appearing to read 'Hofians', written in a cursive style.

Univ.-Doz. Mag. Dr. Robert Hofians

Chairperson of the Compliance Committee of NOVOMATIC AG
Member of the Supervisory Board of NOVOMATIC AG



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Introduction and objectives

NOVOMATIC stands by its responsibility.

As a global gaming technology group with the highest quality standards, the NOVOMATIC AG Group has a high level of social responsibility and is subject to strict legal frameworks. NOVOMATIC knows of its social responsibility – lawful acting and ethical behavior are therefore an integral part of our corporate culture and an important prerequisite for ensuring the long-term success of our company.

Group-wide Compliance Management System

For this purpose, NOVOMATIC AG has established a Group-wide Compliance Management System (CMS), managed by the **Compliance Committee** at Group level and appointed local compliance officers on local level. The Compliance Committee's primary responsibility is to continuously monitor and enhance the CMS by implementing risk-reducing preventive measures.

Success can only be achieved by taking responsibility.

"Winning Responsibly" (success can only be achieved by assuming responsibility) is our conviction at the heart of everything we do. Our vision is to be the world's most innovative and the most responsible provider of "Responsible Entertainment". We operate based on the principles of our corporate values **"do – enjoy – respect"**, which guide us in all our business activities.

NOVOMATIC is committed to the principles of the UN Global Compact.

NOVOMATIC has been committed to the principles of the UN Global Compact (UNGC) and to achieving the Sustainable Development Goals (SDGs) of the United Nations for many years. As a member of the worldwide corporate platform UN Global Compact (UNGC), we are committed to protecting human rights, respecting the rights of employees and their representative organizations, protecting the environment, using resources responsibly, enable fair competition and fighting corruption.

Clear responsibility, mutual respect and trust are deeply embedded in our organizational culture.

What is the Code of Conduct?

Our corporate culture is centered on accountability, mutual respect and trust. Our Code of Conduct is established on these core values and forms the basis for all business actions and decisions. All employees, irrespective of their level of authority, are equally obligated to comply with the provisions outlined in this Code of conduct of the NOVOMATIC AG Group. This Code serves as the foundation for upholding ethical, moral and legal standards in all actions and decisions made by every employee within the Group. It draws upon legal requirements, international standards as well as internal policies and regulations.

The Code of Conduct pertains to all employees and business partners.

The Code of Conduct is valid across all companies in which NOVOMATIC AG has a direct or indirect holding of at least 50 %. Companies in which our shareholding is less than 50 % and our business partners are expected to commit to complying with our Code of Conduct.

We expect our employees to behave correctly and appropriately at all times.

How do we use the Code of Conduct?

In everyday business, there are situations where it may be difficult to ascertain the correct and appropriate behavior. In such challenging situations we must ask ourselves the following questions:

- Is our action/decision legally permissible?
- Does it align with our values, the principles outlined in the Code of Conduct and our internal policies and guidelines?
- Does it prioritize the company's best interests over our personal interests?
- Do we have "confidence" that our action/decision is correct?
- Will our action/decision withstand public scrutiny (e.g., by authorities)?
- Does our action/decision uphold the reputation of our company as a group with high ethical standards?

If all these questions can be answered "YES", then our decision or course of action is probably correct and complies with the relevant principles. If in doubt, please get in touch with the local compliance department.

In order to prevent damage to NOVOMATIC, we follow the requirements of the Code of Conduct.

In all our actions, we always consider the consequences.

What are the consequences of non-compliance with the Code of Conduct?

How does the Code of Conduct protect us?

The Code of Conduct comprises guidelines and principles for behavior that comply with values and laws in everyday business. It aims to provide orientation to all employees in making the right decisions amidst challenging business circumstances. Local legal violations can lead to serious consequences for the entire NOVOMATIC AG Group.

Compliance with the Code of Conduct safeguards not only the NOVOMATIC AG Group but also its employees and mitigates risks. The primary goal should always be to avoid risks that endanger the trust of customers, business partners and the public in the NOVOMATIC AG Group. This reliance forms the basis of our success in business.

Non-compliance with the principles outlined in the Code of Conduct could not only harm our company's reputation and competitiveness but also put our licenses at risk (non-issuance or loss). You may also face disciplinary measures, civil law proceedings and – in the worst case – criminal sanctions.



WE ARE NOVOMATIC – Our principles of conduct

Principles for working together – appropriate conduct of individuals

No violations of laws and standards. We are committed to acting in accordance with the law.

To maintain our position as a leading gaming operator, it is essential that we conduct our business in an exemplary manner, with each individual making their own contribution towards this goal. It is therefore important to base your actions on clearly defined principles. Although much of this Code of Conduct may seem self-explanatory, we want to stress the importance of adhering to the relevant legal regulations of the countries in which we conduct business as a fundamental principle at NOVOMATIC. Regardless of the level of hierarchy, it is essential to adhere to legal regulations and internal guidelines to prevent any violations. Each individual employee bears primary responsibility for complying with the relevant laws and regulations.

Our cooperation is defined by appreciation, trust and respect.

We treat each other in an open-minded and mutually respectful manner that adheres to NOVOMATIC's values. At NOVOMATIC, discrimination is strictly prohibited, and employees are expected to behave professionally, respectfully and thoughtfully in all circumstances. Any unacceptable conduct, such as harassment, threats, insults, rudeness, intimidation and any other form of harassment will not be tolerated.

We expect our managers to fulfil their role model function.

Responsibility of the managers

Our responsibility as a modern, leading group in the gaming industry encompasses a contemporary, value-based management culture. Integrity starts at the top of NOVOMATIC. That is why our managers are expected to demonstrate exemplary behavior, providing guidance to employees and promoting a culture of respectful cooperation.

We believe in a management style based on the recognition of performance, motivation and ethical conduct.

Dedicated employees form the cornerstone of NOVOMATIC's sustainable success. We believe that delegating and endorsing of personal accountability not only raises motivation, but also strengthens identification with the company.

As such, it is our manager's duty to establish distinctly articulated, demanding and achievable objectives while fostering a healthy working atmosphere. This also involves addressing errors constructively within a favorable culture of mistakes and feedback, enabling constant improvement and personal growth.

Compliance with legal provisions serves as the basis for all our actions. Our managers are accountable for ensuring compliance with legal and internal requirements.

NOVOMATIC respects the right to freedom of expression.

Appearance and communication in public

All employees are entitled to exercise their right to freedom of expression. When expressing personal opinions on social media or other online platforms, in which we are recognized as part of NOVOMATIC, we make sure to explicitly identify personal ones as such.

Responsibility for the company.

We expect our employees to display personal loyalty to NOVOMATIC, as their behavior reflects the image and standing of the NOVOMATIC AG Group. We also require our employees to adhere to professional etiquette. In particular, discriminatory and offensive remarks, for example towards competitors, must be refrained from.

No company-related communication without coordination.

Uniform and clear communication is essential, especially in the highly sensitive gaming market, in order to maintain the trust of customers and the public in NOVOMATIC and to ensure a uniform and consistent corporate image. Before any planned communication and marketing measures are carried out, they must be cleared with the responsible communication and marketing department. We shall not make any statements in public on behalf of the Company and always refer to the Group Marketing & Communications Department.

Point of contact

GROUP MARKETING & COMMUNICATIONS
communications@novomatic.com

Social responsibility – respect for human rights

We are dedicated to safeguarding fundamental and human rights.

We are committed to adhering to all applicable legal regulations and upholding fundamental and human rights. At NOVOMATIC, we recognize and respect international human rights and strictly comply with all regulations such as prohibiting child labor and forced labor, ensuring fair remuneration for all, etc. All employees are treated with the utmost dignity and respect at all times.

NOVOMATIC is committed to upholding, amongst others, the principles of the UN Global Compact.

NOVOMATIC is a member of the world-wide company platform United Nations Global Compact (UNGC) and adheres its ten principles. In accordance with the OECD Guidelines for multinational companies, NOVOMATIC also upholds compliance with the United Nations Charter of Human Rights and the implementation of the work and social standards set out by the International Labor Organization (ILO).

We also expect our suppliers to acknowledge fundamental human rights.

NOVOMATIC is dedicated to preventing negative impacts on human rights along the supply chain. Addressing abuses and exerting the necessary influence to improve the situation is also a priority. We require that our suppliers acknowledge the fundamental and human rights of their employees and treat them with dignity and respect. When selecting our suppliers, NOVOMATIC takes into account the principles set out in the Code of Conduct.

Violations of the Code of Conduct can be reported via our whistleblower platform.

In this context, our whistleblowing platform NOVOTRUST enables all employees, business partners and stakeholders to report violations of the Code of Conduct (including human rights violations) voluntarily and anonymously. Any human rights violations related to equality may be reported to the “Equal Opportunities” contact point.

WE SUPPORT



Ecological responsibility – sustainability (environmental protection)

We are committed to environmentally responsible conduct.

NOVOMATIC is one of the world's leading gaming technology producers. As a production company with a high vertical range of manufacture and as an important service provider, we take our responsibility for the environment seriously. NOVOMATIC is aware of the principle of using resources responsibly, sparingly and efficiently, and pursues the goal of minimizing the negative impact of production operations on the environment, continuously optimizing environmental and resource management and thus protecting the environment.

We minimize our environmental footprint by using energy and resources efficiently and by reducing emissions and waste.

NOVOMATIC strives to continuously reduce its carbon footprint whilst steadily increasing the proportion of renewable energy. NOVOMATIC aims to enhance yield from the (raw) materials used in production and to generate less wastage. All raw materials used should be fully recyclable. Additionally, there is an ongoing commitment to lower total and relative water consumption. As much as possible, during production, we utilize energy- and resource-efficient alternatives. Our aim is to produce goods and services in the most eco-friendly and energy-efficient manner feasible, whilst also raising awareness among all employees in this respect.

We also expect our suppliers' commitment to protecting the environment.

We also expect our suppliers to demonstrate a clear commitment to environmental protection and to operate their company in an ecologically responsible and resource-efficient manner.



We are committed to the careful and sustainable handling of company assets.

Use of company resources

Corporate assets, whether physical or non-physical in nature, are meant to help us in achieving our business goals. We must handle corporate resources responsibly and economically. Misusing company assets has negative consequences for us all, causing reputational damage and reducing corporate resources.

Safeguarding company property against loss, theft, damage, or misuse is crucial. Our policy is to utilize company resources for business purpose only. Private use can be permitted according to company regulations.

We maintain a careful balance between personal and corporate interests.

Dealing with conflicts of interest

In working life, individuals may face situations in which opposing interests conflict with each other (known as conflicts of interest). Such scenarios pose problems since decisions may no longer be based on objective criteria due to the conflicting interests.

NOVOMATIC values the private lives and personal interests of its employees. Nevertheless, these personal or private interests must not influence our business decisions. Business decisions should solely consider the best interests of NOVOMATIC. Situations that may lead to personal conflicts of interest or harm to the company's interests are to be avoided.

Conflicts of interest may arise, among other situations, if

- employees are engaged in secondary employment,
- employees exercise political functions,
- employees are involved in the recruitment process of close relatives,
- employees or close relatives maintain personal or economic relationships with business partners,
- employees or close relatives hold shares in competitors, etc.

Close relatives (spouse, partner, children, son/daughter-in-law, siblings, parents) may only be employed if the decision is based on objective criteria such as qualifications, performance, skills as well as experience, and if there is no direct reporting line between the supervisor and the close relative. This exception does not apply for temporary work, such as internships and holiday jobs.

We are committed to integrity and transparency.

A conflict of interest is not necessarily misconduct, but the way it is handled may be. Transparency is crucial. If we are affected by a conflict of interest, it must be reported to the person in charge and the local compliance department. In case the local management is caught in a conflict of interest or if there is an impact on existing licenses, Group Legal Compliance should be notified.

Participation in our gaming or betting is prohibited for all employees.

Participation in gaming or betting on products or on services of our Group is prohibited for all employees of NOVOMATIC, both within and outside of the company's operations. A limited exception to the ban on betting and gaming exists for corporate purposes such as customer demonstrations, tests or market research.

We also expect our suppliers to deal with conflicts of interest transparently.

NOVOMATIC also expects its suppliers to base business decisions solely on objective criteria when dealing with the NOVOMATIC AG Group, ensuring there are no conflicts of interest.

Responsibility towards our employees



We establish a safe and healthy workplace that fosters diversity and innovation.

We value the diversity of our workforce and treat all people equally.

Employee Diversity & Equal Treatment

Only healthy and motivated employees working under safe conditions can foster innovation and ensure sustainable corporate success. At NOVOMATIC, we provide all of this - embodied diversity, integration, equal opportunities and a conscious commitment to social responsibility are fundamental principles of our corporate and management culture.

The commitment to employee diversity, inclusion and the promotion of equal opportunities is crucial to NOVOMATIC's success. We firmly believe that having individuals with distinct perspective and experiences fuels innovation and growth.

NOVOMATIC provides equal opportunities to all its employees, regardless of their:

- gender or gender identity
- ethnic origin, nationality, descent or skin color
- age, marital status, responsibility for dependents or parental status
- health condition, physical and mental abilities
- sexual orientation
- religious or philosophical beliefs
- political conviction

Discrimination is not tolerated.

No discrimination

Any form of discrimination, disadvantage, favoritism, harassment, unfair and offensive behavior or bullying goes against our values and is not tolerated at NOVOMATIC. We are dedicated to always maintaining a culture of fair, respectful and supportive collaboration.

We establish a culture of respect.

In line with our company's values of **"do – enjoy – respect"**, we treat each other openly and with an attitude characterized by mutual trust and respect while maintaining open and constructive communication. At NOVOMATIC, we take a proactive approach to managing differences of opinion and conflicts that may arise when people work together. Employees are obliged to inform the higher-level manager or the local HR department in the event of a (threatening) escalation of a conflict.

Training and further education

We support our employees in their development and offer training and development opportunities.

Training and further education are integral components of employee development – An active learning culture and adaptability are seen as vital to the innovative strength and economic success of NOVOMATIC. NOVOMATIC focuses on promoting and developing the expertise of all employees, providing a variety of training and education options tailored to individual requirements. These opportunities enable employees to prepare well in advance for upcoming changes to work requirements and conditions.

We are dedicated to ensuring equal opportunities and fairness in the workplace.

Equal opportunities & fairness in the workplace

NOVOMATIC is dedicated to ensuring equal opportunities and fairness for all employees during their entire employee life cycle. This entails the provision of fair working conditions in all aspects of employment, such as recruitment and personnel selection, career development, work-life balance, generation management and termination of employment. The **Group Policy on "Equal opportunities"** has incorporated the commitment to promoting fairness and equal opportunities in the workplace.

The **"Equal Opportunities"** Contact Point monitors the implementation of the Group's Equal Opportunities Policy, which is mandatory for all employees. Reports regarding any violation of human rights in relation to equal opportunities can be filed here.

NOVOMATIC recognizes its social responsibility.

NOVOMATIC upholds the personal rights and privacy of each employee and acknowledges their freedom of association. At NOVOMATIC, we show respect towards all employees and employee representatives.

For NOVOMATIC, improving employee health is a crucial element in achieving long-term sustainable corporate growth.

Point of contact

Work safety and employee health

The health, safety and well-being of our employees remain a top priority at NOVOMATIC, and an essential element of our responsibility. Consistent enhancements in work safety and health protection measures ensure that the physical and mental health of our employees is secured, and proactively improved.

Maintaining both the physical and mental well-being of our staff, alongside workplace safety, are crucial corporate objectives equivalent in importance to product quality and the financial prosperity of the company. Ensuring occupational health and safety is consistently taken into account across all operational activities.

GROUP CORPORATE RESPONSIBILITY & SUSTAINABILITY
cr@novomatic.com

GROUP HUMAN RESOURCES
equalopportunities@novomatic.com



Responsibility towards our customers

No gaming without secure framework conditions.

Responsible Entertainment

Customers who enjoy responsible gaming are the foundation for lasting business success. In order to maintain the enjoyment of gaming, it is necessary to promote a healthy sense of personal responsibility among players and implement adequate measures for player protection.

We are committed to modern player protection and responsible marketing.

NOVOMATIC places great importance on player and youth protection and considers this a top priority. Our services are only available to individuals who are of legal age. We do not permit minors to use our services. **Responsible Entertainment** is an essential aspect of NOVOMATIC's business operations and sets the minimum standard throughout the Group for responsible gaming and betting. The measures in place aim to identify and prevent problematic gaming behavior and provide assistance when needed.

Technology with responsibility.

NOVOMATIC creates innovative hardware and software that complies with all country-specific legal requirements to meet strict regulations for protecting minors and players.



We provide responsible entertainment and ensure that our products and services are used conscientiously.

With the **Group Policy on Responsible Entertainment**, NOVOMATIC has developed a framework within the Group to provide direction on player protection in various operational units. The Policy is the basis for internal trainings on the subject of player protection and is accessible to all new employees. Our employees undergo comprehensive training to uphold player safety, promptly detect any concerning behavior, and take appropriate action.

Other measures in our player protection and prevention program that go far beyond the legal requirements include the G4 player protection standard of the Global Gambling Guidance Group, implementation of the principles of the World Lottery Association, long-standing collaboration with relevant experts and institutions, extensive employee training on addiction prevention, biometric access restrictions, access control systems and responsible marketing strategies.

NOVOMATIC advises customers about the risk associated with excessive use and may limit the duration of play, frequency of visits and number of bets in accordance with local legal regulations. This plays a crucial role in preventing problematic gaming behavior.



Point of contact

Further information is available under [responsible-entertainment](#).

GROUP CORPORATE RESPONSIBILITY & SUSTAINABILITY
cr@novomatic.com

Responsibility towards society



We support the community through sustainable sponsorship, donations and volunteering efforts.

Sponsorship and donations

NOVOMATIC takes responsibility as an active participant within society and supports selected initiatives in the fields of sports, culture, science and business. Our sponsorships, donations and voluntary efforts in these domains aim to deliver a consistently beneficial impact on the community.

Sponsorship is a key way of entering into valuable partnerships with initiatives and partners worthy of support, thereby meeting our social responsibility.

NOVOMATIC also supports non-profit organizations as part of its social responsibility. We make sure that all **donations and benefits** are used as intended, and that the funds have the greatest possible impact.

We are committed to maintaining transparency and upholding social responsibilities whilst sponsoring and donating.

The areas in which the company wishes to be active through sponsorship and donations are clearly defined and continually evaluated. Clearly defined donation and sponsorship criteria as well as binding guidelines from our **Group Policy on Anti-Corruption** provide a clear framework for decision-making and action.

As a gaming company, we provide a sensitive service that demands highly responsible conduct. This also includes a clear commitment to the protection of minors. According to our strict donation and sponsorship policies, we are unable to support any sponsorship projects targeting children and young adults, including any form of projects involving children and young people. In all sponsorship activities, we ensure that player and youth protection is maintained.

All sponsorship and donations must be verified and recorded.

The identity of the recipient and the planned objective have to be verified and recorded. The sponsoring of events of political parties or of organizations in which politicians or persons closely affiliated with them hold the function of an executive body is generally prohibited. Exceptions to this rule only apply to specific cases and must meet the strict requirements of the Group Policy on Anti-Corruption. Donations to political parties are only permitted in case all transparency criteria are met and a strict approval process is followed.



Here you can find more [information](#) on the sponsorship and donation principles.

Point of contact

GROUP MARKETING & COMMUNICATIONS
communications@novomatic.com

Dealing with business partners and third parties



No business without respect for ethical principles.

We maintain integrity, honesty and decency in all our business relationships, expecting the same from our business partners.

Selection of our business partners (supplier responsibility)

As Europe's largest gaming technology group and one of the world's leading full-service providers in the gaming industry, NOVOMATIC is committed to ethical, lawful and socially responsible business practices. We place the highest demands not only on the quality of our products, but also on professional business conduct in general.

NOVOMATIC expects both its employees and also its business partners to comply with the NOVOMATIC Code of Conduct and to make a clear commitment to lawful conduct and also to adhere to the **NOVOMATIC Supplier Code of Conduct**, which covers the following topics:

- Compliance with laws and regulations
- Avoidance of corruption and money laundering activities
- Compliance with export controls with all associated restrictions, sanctions and embargoes
- Responsible sourcing of raw materials
- Equal opportunities and prohibition of discrimination
- Prohibition of child labor and forced labor
- Minimum standards in the areas of environmental protection, labor law and safety
- Protection of confidential information and intellectual property rights

We take appropriate actions if our principles are violated.

NOVOMATIC values long-term business relationships. Nevertheless, non-compliance with these standards by the business partner may result in a restriction or termination of the business relationship, including black-listing.

We choose our business partners carefully.

To ensure the reliability of our business partners, we assess potential business partnerships by conducting risk-based reviews (KYC due diligence) prior to finalizing agreements, applying transparent criteria when selecting our business partners. Our cautious selection of business partners further lowers potential risks, as unsound business practices by a business partner could have a negative impact on our reputation and competitiveness.

NOVOMATIC takes responsibility in the supply chain.

We are dedicated to complying with auditing obligations to avoid any violations of human rights in the supply chain in line with legal requisites. NOVOMATIC also makes sure that its business partners follow social and environmental responsibilities, including human rights, work conditions, anti-corruption measures and environmental protection. We expect our business partners to follow all relevant national and international laws as well as align with the principles of the UN Global Compact, the 2030 Agenda and its Sustainable Development Goals (SDGs), and the NOVOMATIC Supplier Code of Conduct.



Here you can find the [NOVOMATIC Supplier Code of Conduct](#).

We comply with all applicable statutory import and export regulations.

Global Trade

As a globally operating company, the distribution of our products and technologies beyond national borders is of vital importance. NOVOMATIC follows the relevant laws in foreign trade that govern the import and export of specific goods, services, technical data and software across borders, including their re-export. We recognize the diversity of these laws and collaborate closely with local customs and tax authorities to meet obligations and report any prohibited activities.

NOVOMATIC adheres to all relevant trade restrictions.

We comply with the relevant laws concerning economic sanctions and do not participate in or support restrictive trade practices or economic boycotts imposed by third countries.

In accordance with the NOVOMATIC's **Group Policy on Trade Compliance**, which applies to all NOVOMATIC Group employees, accurate and complete information must be provided in customs documents and any official notification related to the import or export of NOVOMATIC products, spare parts, software or other technologies must be promptly reported to NOVOMATIC's Trade Compliance Department.

Point of contact

GROUP TRADE COMPLIANCE

trade compliance@novomatic.com



Anti-corruption

We are committed to honesty and integrity in our business and social activities.

No corruption – we aim to secure our orders fairly, by providing high-quality products and services and transparent pricing, without resorting to undue influence. At the same time, we do not allow ourselves to be unduly influenced, but instead make decisions based on factually comprehensible reasons.

In any case, it is important to avoid any hint of improper influence – particularly when interacting with public officials and authorities – along with any resulting negative consequences, such as harm to reputation or other financial disadvantages.

We also oblige our business partners to comply with our principles.

NOVOMATIC provides clear guidelines for fighting corruption and also obliges its business partners, such as suppliers and consultants, to follow these principles.

Our Group Policy on Anti-Corruption aims to prevent corruption before it begins.

Our Group Policy on Anti-Corruption outlines specific behavioral requirements and thresholds limits for certain business activities.

To meet the increased challenges of fighting corruption in our international business activities, NOVOMATIC has implemented stringent measures as part of the **Group Policy on Anti-Corruption** for all employees of the NOVOMATIC Group in a binding manner.

The **Group Policy on Anti-Corruption** includes strict regulations on the provision, proposal and receipt of gifts, invites to business meals and events, as well as sponsorship and donations.

The guiding principle is to avoid any appearance of improper influence. When interacting with customers and business associates, benefits (gifts and invitations) are customary and permissible within reasonable limits. However, it is essential to exercise caution when dealing with public officials as it is strictly prohibited under any circumstances to offer or grant them gifts or other benefits.

To determine whether a benefit qualifies as appropriate, we follow the threshold limits per business partner outlined in the Group Policy on Anti-Corruption. In case of doubt, we consult our manager for guidance. Any benefits exceeding this threshold must be transparently disclosed and approved by either the manager or the management. Documentation shall be provided to the responsible local compliance officer using the appropriate reporting forms.

To avoid the financial or reputational damage, we always make decisions based on clear and objective reasons.

Dealing with government authorities and lobbying

We are committed to conscientious and transparent dealings with government authorities.

We interact with government authorities in various ways, such as granting of licenses or concessions. Since NOVOMATIC is in the focus of public interest, it should be emphasized that all employees are expected to comply with the law and that increased transparency is necessary, particularly when dealing with government authorities.

We are willing to offer our know-how to help develop regulatory frameworks and participate transparently in the public decision-making process by providing information and our industry expertise as needed. Of course, we comply with all relevant legal requirements and conduct any lobbying activities transparently and within the law.

More information is available in the [NOVOMATIC Code of Conduct for Public Affairs Activities](#).



Fight against money laundering and terrorist financing

No opportunity for money laundering activities.

Money laundering is the channeling of illegally generated funds and assets into the legal financial and economic cycle (e.g., drug trafficking, arms trafficking, tax invasion). Any business transaction poses a potential risk for money laundering activity.

We are committed to preventing money laundering and terrorist financing.

One of the key goals of NOVOMATIC AG Group is to combat money laundering and the financing of terrorism. NOVOMATIC adheres to national and international sanction regimes and take a clear stance against money laundering and terrorist financing.

To achieve this, an **Anti-Money Laundering prevention concept (AML-concept)** has been developed and is continuously improved. A key component of this concept involves the risk-based due diligence of our contractual partners (KYC due diligence). In addition, we cooperate closely with the responsible authorities and fulfil our existing reporting obligations (SAR reports). Our AML-concept further relies on binding guidelines and manuals, as well as employee trainings.

In case of queries or the need to report any suspicious cases of money laundering, please do not hesitate to contact the Group AML-Officer.

Point of contact

GROUP LEGAL COMPLIANCE
compliance@novomatic.com

The way of doing business

Dealing with competitors

No anti-competitive practice.

NOVOMATIC aims to maintain a high level of integrity in its business activities. Compliance with national, European and international legal requirements and upholding account high values and best-practice standards, is therefore one of the fundamental principles of the NOVOMATIC AG Group.

We are committed to fair competition.

We are committed to upholding fair competition and preventing behavior that distorts the market. We denounce unlawful agreements and market abuse by those with dominant market positions.

Each of us is obliged to respect the rules of fair competition and to comply with the applicable antitrust laws and internal guidelines. The legal obligations are explained in the **Group Policy on legally compliant behaviour regarding antitrust law** as well as in the accompanying guideline and are intended to assist employees in their day-to-day business activities.



Correct reporting

We are committed to accurate and truthful reporting.

In order to make correct decisions, a good information base must be available. This requires correct and truthful reporting.

No disclosure of incomplete information.

As part of our professional activities, we ensure the completeness and accuracy of all records under our responsibility. We also ensure that the records are made in a timely manner and in compliance with the relevant rules and standards, regardless of whether the information is intended for submission to public authorities or not.

Data protection, digitalization and AI

We are committed to handling personal data with care.

Compliance with data protection and information security is crucial to NOVOMATIC for maintaining stable and successful customer relationships. The protection of privacy and the security of the personal data of customers, business partners and employees are of great importance for the sustainable success of the company.

We also expect our business partners to protect personal data.

Employees, business partners and customers should be able to trust that their data is protected. At the same time, NOVOMATIC expects business partners to process personal data of employees of the NOVOMATIC AG Group only as necessary and legally permissible and to protect it appropriately.

NOVOMATIC uses personal data exclusively in compliance with the legal requirements, specifically with the General Data Protection Regulation (GDPR) applicable in the EU and respective national data protection regulations. We protect personal data from unauthorized use through appropriate technical and organizational measures and prevent unauthorized access by third parties.



We ensure compliance with data protection rights at all times.

NOVOMATIC only shares data with processors (service providers) who can guarantee lawful and secure data use on the basis of a written data processing agreement. In case of queries regarding the use of personal data, please contact the responsible local data protection officer.

For information on data protection, please refer to the **Group Data Protection Policy**, and for information on data security, please refer to the **Group IT Policy**.

Here we offer all interested persons further information on the [NOVOMATIC-Privacy Policy](#).



Point of contact

DATA PROTECTION OFFICER NOVOMATIC AG
dataprotection@novomatic.com



We use AI responsibly and focus on protecting privacy.

Use of Artificial Intelligence (AI)

As a technology-leading company in the gaming and betting sector, NOVOMATIC takes a very positive view of new technological developments. This also includes the use of artificial intelligence (AI) and the use of AI bots (such as ChatGPT). We are committed to a responsible approach to this new technology.

Responsible use of AI involves recognizing the potential risks and dangers that may arise from its improper use. It is crucial to consider data protection and copyright law when implementing AI.

NOVOMATIC AG has published guidelines for the use of AI at an early stage and will update them on an ongoing basis in order to create standardized framework conditions within all companies of the NOVOMATIC AG Group. This will ensure safe and legally compliant use in a professional context for future developments in the field of AI.



Dealing with company property, confidentiality and property rights

We are committed to handling company and business secrets confidentially.

The confidential handling of information is important to us. NOVOMATIC takes great care to protect and safeguard all confidential information.

Confidential information is protected to a special extent as it secures our competitive edge. This includes trade secrets, such as design drawings, samples, models, formulas and software as well as business secrets like internal reporting figures.

At the same time, we respect and protect the business secrets of our suppliers, customers, consultants, agents and other parties involved, and treat them confidentially.

No disregard of property rights and no disclosure of information.

As employees, we are obliged to maintain confidentiality and ensure that we do not disclose any confidential information about NOVOMATIC or provide unauthorized insights into our business processes, in our interactions with business partners or in our personal lives. This obligation to maintain confidentiality also extends beyond the end of our employment relationship, as the disclosure of confidential information, regardless of when it occurs, can harm NOVOMATIC, our suppliers or customers.

We protect our intellectual property.

NOVOMATIC develops, produces and distributes high-tech gaming equipment and systems. These products are protected by various industrial property rights, including trademark, patent and design protection as well as copyrights. Protecting these resources against misuse is of utmost importance to us. We respect third-party property rights, such as patents and trademarks, and expect our competitors to do the same in return.

Business and trade secrets (can) lose their protection, if they are not adequately safeguarded and documented. Therefore, it is crucial to take particular care in implementing protective measures to prevent the loss of protection of business and trade secrets and avoid economic damage to the company.

It is crucial to maintain confidentiality of new products or processes secret from external parties, such as during company tours, customer visits and presentations. This is because as long as our innovation are still in the research and development stage, they are not protected by a patent and premature disclosure could harm our ability to obtain a patent in the future.



We protect our business and trade secrets.

If external individuals are given access to company secrets or innovations of any kind, they must sign a non-disclosure agreement. It is important to note that any form of image and sound recordings, except for operational purposes, is strictly prohibited on company premises. This rule applies especially to visitors of our production facilities. The confidentiality of trade secrets is essential to protect our intellectual property rights and expertise.

Every employee can contribute to preventing the misuse of products. If imitations of our products (product piracy) or other infringements of our intellectual property are discovered, they must be reported to Group Legal.

Point of contact

GROUP LEGAL

ipenforcement@novomatic.com

Compliance with the Code of Conduct

NOVOTRUST

Group-wide whistleblowing reporting system

Our whistleblower reporting system NOVOTRUST is available to all employees and business partners.

With NOVOTRUST, NOVOMATIC has implemented a Group-wide electronic whistleblower reporting system in compliance with legal requirements and depending on the size of the company, that ensures the confidentiality of reports.

The system is available to both employees and business partners. At www.novomatic.com/novotrust, anyone can report any violations of the law or a breach of our Code of Conduct voluntarily, confidentially and anonymously. Rest assured that all information will be treated with strict confidentiality.

The protection of our whistleblowers is important to us.

Whistleblowers are protected against discrimination, demotion, or other reprisals as required by law. This protection only applies, if the report was made in good faith, meaning the whistleblower had reasonable grounds to believe that a violation of a law, a Group Policy or the Code of Conduct had occurred. There is no protection in case of a knowingly false report.

Point of contact

Further information and details on the reporting process are available at NOVOTRUST.



Non-compliance with the Code of Conduct can have severe consequences.

Non-compliance with the principles outlined in the Code of Conduct can endanger the reputation and competitiveness of the NOVOMATIC Group resulting in significant economic damage.

For an individual employee, violations of the Code of Conduct may result in disciplinary measures as well as civil and criminal consequences.

NOVOMATIC supports all employees with subject-specific e-learning.

The topics of the Code of Conduct are explained in detail through various subject-specific e-learning as well as in face-to-face training sessions.

The Code of Conduct is available in various languages.

The Code of Conduct is published in the national languages of all relevant markets and is made available by the local compliance departments. The latest version of the Code of Conduct is also available in selected languages [online](#).

Regular review of the Code of Conduct.

A review of the Code of Conduct takes place at regular intervals to incorporate legal changes and suggestions for improvement.

Point of contact

GROUP LEGAL COMPLIANCE
compliance@novomatic.com



Glossary

Compliance	Behaving in accordance with the valid and applicable law, other legal regulations, industry practice and internal rules.
Corporate Responsibility (CR)	CR stands for responsible corporate practice in the actual business activity, from ecological relevant aspects (environment) to aspects regarding the treatment of employees and exchange with relevant lobbies and stakeholders.
Due Dilligence	refers to the thorough examination and analysis of a company or individual, specifically in relation to their economic, legal, tax, and financial circumstances.
Gaming	Gaming is when the decision on the outcome of a game is completely or predominantly based on chance. In terms of this Code of Conduct it may also refer to the business sector of betting.

Artificial Intelligence (AI)	in general, the term is used to describe intelligent (self-learning) systems that analyze their environment and act with a certain degree of autonomy.
Corruption	the misuse of entrusted power for use or benefit of a private person or of a corporation.
Whistleblowing	whistleblowing refers to drawing attention to grievances, illegal practices or general risks.

Notes

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