



Code of Conduct and Ethics

Table of contents

Our commitment to Integrity & Compliance - Message from the Management Board	2
1. Introduction	3
2. Our responsibility for Compliance	4
2.1 Our responsibility	4
2.2 Expectations from our employees	4
2.3 Responsibility of managers	4
3. Our responsibility as a member of the society	5
3.1 Environmental protection	5
3.2 Diversity, inclusion & prohibition of discrimination	5
3.3 Respect for human rights & workers' rights	6
3.4 Lobbying	6
3.5 Donations & Sponsoring	6
4. Our responsibility at the workplace	7
4.1 Dealing with conflicts of interest	7
4.2 Anti-Bribery and Anti-Corruption	7
4.3 Anti- Money Laundering and Terrorist Financing	8
4.4 Protection of personal data	8
4.5 Responsible Gaming	8
4.6 Information security & game secrecy	9
4.7 Game participation	9
5. Support & resources	10
5.1 Whistleblowing system & prohibition of retaliation	10
5.2 Contact	11
5.3 Ethical decision-making checklist	11



Erwin van Lambaart



Martin Škopek

Our commitment to Integrity & Compliance – Message from the Management Board

Dear employees,

Our Code of Conduct and Ethics (the Code) is embedded in our corporate culture and defines who we are as a company and how we conduct our business. Our Code sets out the key principles that guide us to do the right thing and to always act with integrity.

To safeguard our reputation and ensure sustainable business success, it is essential for all of us to understand and genuinely live the core values of our Code. Our Code serves as a guide for our daily work by helping us make sound business decisions and providing us with a reliable point of reference.

We comply with the law as well as with our internal policies and guidelines. Acting ethically and with integrity makes us a reliable concessionaire and strengthens the trust of our stakeholders, especially the trust of our guests and customers.

We, the members of the Management Board, are personally committed to the principles and values described in this Code. We also see it as our duty to provide a framework to our employees that offers the best possible conditions for complying with this Code in their daily work.

Each of you is an ambassador of our company and is responsible for ensuring that our company is living the values of our Code. We also rely on your cooperation if you ever suspect or witness that the principles of our Code are being violated.

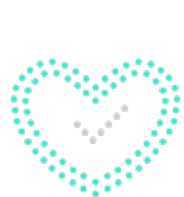
Thank you for your continued commitment and dedication!

Erwin van Lambaart
Martin Škopek

1. Introduction

Our corporate culture is characterized by decades of experience in all areas of the gaming industry, driving innovations and the implementation of shared visions, our integrity and the highest level of professionalism towards our customers, guests, business partners and regulators, as well as genuine teamwork and the development of our employees.

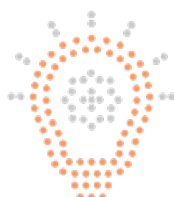
Our corporate group is made up of many different business units. Whether casinos, lotteries, online gaming, international business, sports betting or video lottery terminals - we have a common foundation on which we can build and work successfully. Our core values are:



**We do what
is right**



**We win
together**



**We think
differently**

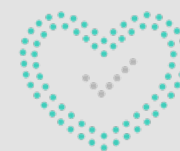
These values describe how we define ourselves as a company and guide us in doing the right thing for ourselves and our stakeholders. Our Code is designed to support us in implementing these values and serves as a guide for what

is expected from us when working toward our business objectives. Goals must never contradict with our Code, applicable laws or other company guidelines. Objectives must be achieved in compliance with the principles and values described in this Code.

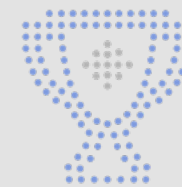
Our Code is binding and applies to all employees of the Austrian companies within the corporate group. This includes employees in all business, competence and holding lines, regardless of whether we are employees, managers or board members. The Code also applies to all interactions we engage in as part of our daily work, including social media and events where we represent our corporate group.

Compliance with the values and principles of the Code is non-negotiable for us. Violations of the Code will not be tolerated and will result in appropriate disciplinary actions up to and including dismissal, depending on the severity of the violation. These measures are applied equally to all employees.

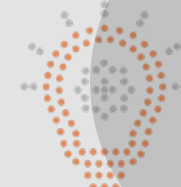
Some sections of this Code reflect applicable laws, which means that certain violations of the Code may also constitute violations of the law. In such cases, criminal penalties, including fines and/or imprisonment, may be imposed.



**We do what
is right**



**We win
together**



**We think
differently**

2. Our responsibility for Compliance

2.1 Our responsibility

Compliance with applicable laws concerns us due to our social responsibility. All of our business decisions are made in accordance with the legal requirements under which we operate.

Our continuously evolving compliance management system provides a secure framework that ensures compliance with regulations and the fulfillment of ethical standards by maintaining and promoting a culture of compliance. This Code constitutes an integral part of our compliance management system.

To ensure our success, the Compliance department sees itself as an internal service provider and consultant for management, the business and holding lines, and all competence lines, by offering the necessary training and ongoing support.

Our measures and compliance rules are designed to enable all employees to manage their own conduct in accordance with legal requirements and the company's corresponding policies, and to make the best possible decisions in their daily work. Each of us is responsible for complying with all guidelines and policies, acting with integrity, making ethical decisions, and conducting business in accordance with our corporate policies and values.

2.2 Expectations from our employees

Our employees have a crucial role in ensuring that we conduct our business ethically and thus have a significant impact on the success and reputation of our corporate group.

We require all employees to read and understand our Code and agree to comply with it. We also expect our employees to maintain the highest standards of professionalism, integrity, and ethical behavior at all times.

When in doubt, we expect our employees to seek competent advice to make the right decisions. Appropriate resources are listed under chapter "Support & Resources".

If our employees have concerns about potential violations of the Code, other internal guidelines or laws and regulations, we encourage them to speak up and raise their concerns. You can do this either through your manager, the Compliance department or through our whistleblowing system (**C&L Integrity Line**).

2.3 Responsibility of managers

In addition to the responsibilities of employees, our managers have a special role and duty. They serve as role models and must set the highest ethical standards for their teams.

We expect our managers to create an environment where employees feel safe to ask questions and raise concerns about potential compliance violations.

Talk to your employees about the importance and relevance of ethics and compliance, our policies, and the Code. We also expect our managers to be particularly vigilant in ensuring compliance with the Code and all other relevant guidelines and laws. If you are a manager and become aware of a potential violation or an employee reports a potential violation to you, you should not investigate the matter by yourself. Take responsibility for promptly reporting the matter to the Compliance Department or use the **C&L Integrity Line**.

Managers also play a critical role in ensuring that there is no retaliation against employees who report concerns in good faith and with honest intention. Any form of retaliation is strictly prohibited in our company.



3. Our responsibility as a member of the society

3.1 Environmental protection

The climate crisis and its consequences are the greatest threat to human existence and, consequently, to the sustainable continuity of our company. Everyone is therefore called upon to contribute to solving this crisis. It is essential to achieve climate neutrality and create a circular economy. This project will only succeed if everyone works together, and our corporate group is committed to doing its part.

We act in accordance with the precautionary principle - our employees are committed to the responsible and efficient use of natural resources, the preventive protection of the environment, and to measures that continuously reduce our ecological footprint. Therefore, we are committed to using resources sustainably, preventing pollution, and using sustainable business practices to minimize our impact on the environment.

We promote sustainable and climate-friendly purchasing. Regional and seasonal products are preferred, as well as green manufacturing, and circular economy initiatives. We aim to avoid waste wherever possible.

To contribute to climate protection, we calculate our CO₂ emissions every year. From this, we derive meaningful measures to continuously reduce our emissions. Managers

and employees must support these calculations by providing data and key figures, and must implement appropriate measures, with the aim of becoming climate-neutral in a timely manner.

3.2 Diversity, inclusion & prohibition of discrimination

Our employees are important stakeholders in our corporate group and we want to utilize and value their unique skills and perspectives within an inclusive and diverse work place environment. We are committed to embedding diversity and inclusion into our daily work and to promoting a fair recruitment process and equal opportunities.

We assess all applicants and employees based on their qualifications, proven skills and performance, and we offer equal career opportunities, working conditions, and compensation practices for everyone. This is regardless of personal characteristics and in line with objective criteria and principles.

We respect the personal dignity, privacy, and personal rights of every individual. Discrimination and harassment based on age, gender, nationality or ethnic origin, religion, political opinion, sexual orientation, disability or any other legally protected characteristics will not be tolerated.



3.3 Respect for human rights & workers' rights

By signing the UN Global Compact, we are fully committed to respecting and complying with human rights and all related obligations in our business activities.

Labor and social law obligations are not just legal requirements for us - they are a genuine matter. We protect and respect the right to freedom of association and collective bargaining.

We take our responsibility for the health and safety of our employees very seriously and are committed to complying with all applicable laws regarding employee protection, health, and safety. Workplace safety is a priority, and all necessary measures are taken to provide a safe and healthy working environment and to prevent accidents. Health and safety regulations and practices must be followed. Accidents, injuries, and unsafe conditions must be reported immediately to the department responsible for occupational safety.

A safe and healthy workplace environment is essential for the long-term growth of our company. For this reason, we maintain and promote the health and job satisfaction of our employees through targeted prevention and health promotion activities.

3.4 Lobbying

The lobbying activities of our corporate group are based on the Code of Conduct of the Austrian Public Affairs Association. We conduct our lobbying centrally through dedicated

persons, in a transparent manner, and in compliance with applicable laws.

In dealing with political parties, neutrality is of course an important matter for us. Unfair, improper, and inappropriate influence on politics and legislation in the context of lobbying activities, particularly through offering, promising or granting benefits, is strictly prohibited.

3.5 Donations & Sponsoring

We aim to entertain people, create moments of happiness, and give back to the community.

We take our social responsibility seriously and are a reliable and innovative partner in and for Austria. Our donation activities (which we define as voluntary contributions without services given in return) and our sponsoring activities (which we define as contributions based on a contractually agreed service in return) are carefully selected.

To avoid conflicts of interest and to ensure consistent behavior throughout the company, all donations and sponsorship activities must go through an internal and transparent approval process. It is also important to ensure that the protection of players and young people is maintained in all our sponsoring activities. Donations to political parties and organizations are not permitted.

4. Our responsibility at the workplace

4.1 Dealing with conflicts of interest

In the course of our daily work, situations may arise in which the interests of the company are or appear to be in conflict with our personal interests. A conflict of interest arises when we are in a position to make or influence a business decision on behalf of the company, and our personal interests or those of a related party differ from the interests of the company.

Conflicts of interest can impair our ability to make objective and transparent decisions and thus damage our reputation and cause financial harm. While we respect the personal interests of our employees, we place equal importance on avoiding conflicts of interest. When making business decisions, we do not allow ourselves to be influenced by private interests, nor do we take advantage of business opportunities for personal benefits or for the benefit of a related party.

To ensure the success of our corporate group, it is essential that we maintain our focus on our work. Therefore, our employees may not engage in any paid or unpaid secondary employment that could lead to conflicts between their personal interests and those of the corporate group or distract them from their tasks in our company.

To avoid conflicts of interest, all employees are required to promptly disclose any circumstances that may give rise to an actual or potential conflict of interest to their manager and the Compliance department.

4.2 Anti-Bribery and Anti-Corruption

We reject all forms of bribery and corruption and comply with all applicable laws and regulations aimed at combating bribery and corruption. Bribery and corruption in any form contradict our values, our Code and our internal guidelines.

Corruption can occur in an active form (bribing someone by granting benefits) or a passive form (being bribed by accepting benefits) and can have serious consequences for those involved. In many cases, bribery is a criminal offense that can result in significant penalties.

When granting and accepting gifts or hospitality, binding rules and approval requirements must be followed. These are defined in our internal guidelines and ensure that only permissible benefits are given or received, thereby protecting our employees from legal consequences.

In accordance with our internal guidelines, the acceptance and offering of gifts or hospitality are generally permitted, provided that their value and frequency are appropriate. Due to increased legal risks, special care must be taken when dealing with government officials.





**IF YOU HAVE ANY QUESTIONS
OR WOULD LIKE TO REPORT ANY
SUSPICIONS, PLEASE CONTACT
THE ANTI-MONEY LAUNDERING
OFFICER AT COMPLIANCE@CAL.AT.**

Relationships with our business partners are based on integrity and transparency - values we stand for. When offering or accepting a gift or hospitality, you should always consider how it might be perceived by others and act in a way that avoids even the appearance of bribery and corruption.

4.3 Anti-Money Laundering and Terrorist Financing

We do not tolerate any actions within our corporate group that could support money laundering or the financing of terrorism.

We are committed to preventing money laundering and take all necessary measures to minimize this risk in our business activities through an appropriate prevention framework, targeted training programs, and an ongoing risk assessment.

We carefully verify the identity of our customers and business partners, and our employees are required to immediately contact the Anti-Money Laundering Officer in the event of any suspicious transaction that could indicate a money laundering activity. This requirement is set out in our internal Anti-Money Laundering policy.

If you have any questions or would like to report any suspicious transactions or observations, please contact the Anti-Money Laundering Officer under **compliance@cal.at**.

4.4 Protection of personal data

To protect privacy, personal data is collected, processed, and stored only in accordance with the legal requirements of the GDPR.

We are committed to protecting and responsibly handling the personal data of our employees, former employees, guests, and business partners. Our employees are required to comply with data protection regulations and ensure that personal data is reliably protected against unauthorized access.

If you have any questions regarding the use and handling of personal data, please contact the data protection officer at **datenschutz@cal.at**.

4.5 Responsible Gaming

The principle of responsible gaming guides all of our business activities. In particular, it defines our core business, where player protection, responsible advertising, responsible sponsorship, and fair gaming play a central role. As a gaming operator, we have a special responsibility towards our customers and guests.

In addition to ensuring the implementation of legally required player protection, the core objective of Responsible Gaming is to develop measures to prevent possible problematic effects of gaming products. The most important preventive tools include education and information about

the risks of gaming, responsible advertising and sponsorship strategies, offering self-control tools for players, and self-restrictions.

The key to successfully offer responsible gaming lies particularly in the hands of our employees. Knowledge of the fundamental principles of player protection is the essential foundation for our collective work. In line with this approach, we maintain a continuous information exchange with national and international research institutions as well as Austrian counseling and treatment centers for people with problematic gaming behavior. This expert network enables us to offer our employees training and further education that reflects the latest scientific research.

In light of the above, our employees are committed to diligently comply with the extensive legal requirements for player and youth protection in the sense of responsible gaming.

Through our Responsible Advertising guideline, we are committed to fulfilling our social responsibility in this area as well, going far beyond general advertising principles.

4.6 Information security & game secrecy

Confidential and sensitive business information of the corporate group, its guests, and its business partners are subject to confidentiality and may not be disclosed to

unauthorized third parties. This obligation of confidentiality applies to all employees and remains in effect even beyond the end of the employment. If disclosure is required due to a decision of a competent court or regulatory authority, the legal department will assist in assessing and determining the extent to which a disclosure is permissible.

We ensure that all confidential and sensitive business information and data, as well as information about guests, customers, and business partners, are effectively protected against unauthorized access, alteration, destruction or loss, unlawful transmission, other unauthorized processing, and any other form of misuse.

This protection is achieved through the implementation of organizational and state-of-the-art technical measures and is periodically reviewed for effectiveness.

4.7 Game participation

Our guests' and customers' trust in our games is an important and valuable asset. To avoid any doubt about the integrity of our games, certain employees are restricted from the participation in certain games. Specific prohibitions are explicitly defined in the employment contracts or other regulations/policies.



**INFORMATION ON BREACHES
OF THE RULES CAN BE
REPORTED THROUGH THE
WHISTLEBLOWING SYSTEM.**

5. Support & resources

5.1 Whistleblowing system & prohibition of retaliation

It is important that legal and ethical concerns are clarified as early as possible. Together, we protect the company by speaking up and raising concerns about such violations.

If you become aware of (suspected) violations of our Code, our internal policies and principles or the applicable laws, you can report it to internal contact persons (i.e. managers and the Compliance department). In addition, such potential violations can be reported through our whistleblowing system the **C&L Integrity Line**. This can be also done by staying anonymous if preferred.

We expect our employees to report their concerns regarding ethical and legal violations in a timely manner. As a company, this enables us to act proactively to minimize potential impacts and address any misconduct.

We expect our managers to be available to their employees, to take reported concerns seriously, and to report them without delay to the relevant departments (Compliance department, internal audit, whistleblowing system).

As a company, we do not tolerate or take any form of retaliation (e.g. verbal abuse, threats, termination, demotion, denial of promotion) against any employee (or other person) who raises a concern in good faith and with honest intention. Retaliation is subject to disciplinary measures, which may include termination of employment. It is also considered a serious violation to prevent or discourage someone from raising their concern.

The whistleblowing system is designed to protect the company and anyone who helps to identify and eliminate either violations or misconduct. Reports of specific ethical and legal concerns will be investigated promptly and confidentially by authorized persons.

The whistleblowing system must be respected and not misused for dishonest and inappropriate reporting. A misuse of the whistleblowing system will not be tolerated and will be subject to disciplinary actions.

5.2 Contact

If you have any questions about this Code or require further information on the Compliance Management System, you can contact a member of the Compliance team directly or contact the team under **compliance@cal.at**.

5.3 Ethical decision-making checklist

This Code cannot cover every possible scenario that we may encounter in our daily work. To help you make ethical decisions, we have created some key questions to help guide you. Answering these questions should help you assess whether your behavior is in line with our values and principles (this is the case if you can answer “yes” to all questions). If you cannot answer all questions with a clear “yes” or if you have any doubts, please contact your manager or the Compliance department.

Ethical decision-making checklist

- | | | |
|------------------------------|-----------------------------|--|
| <input type="checkbox"/> YES | <input type="checkbox"/> NO | 1) Is it legal? |
| <input type="checkbox"/> YES | <input type="checkbox"/> NO | 2) Is my decision in line with the framework of internal guidelines and policies and does it comply with the Code of Conduct and Ethics? |
| <input type="checkbox"/> YES | <input type="checkbox"/> NO | 3) Would I still consider my decision to be the right one or could I justify my behavior if it is discussed in the media? |
| <input type="checkbox"/> YES | <input type="checkbox"/> NO | 4) Have I considered the impact on the company, employees, customers, and other stakeholders? |
| <input type="checkbox"/> YES | <input type="checkbox"/> NO | 5) Is the decision in the best interests of the company and not just in the interest of certain individuals? |
| <input type="checkbox"/> YES | <input type="checkbox"/> NO | 6) Would I feel comfortable explaining the decision to my family, colleagues and manager? |

IMPRINT

Casinos Austria AG - Österreichische Lotterien GmbH
Compliance Department
Rennweg 44, A-1038 Vienna
Tel.: +43 (1) 79070 - 0
E-mail: compliance@cal.at

www.casinos.at, www.lotterien.at

Compliance: compliance@cal.at
Data protection: datenschutz@cal.at
Website link: Whistleblowing system C&L Integrity Line

09.2025

Grafics:

Michael Tupy, www.tupy.org

Pictures:

Casinos Austria und Österreichische Lotterien
Annalena Duschl, annalenaduschl.com
Christof Wagner (Management Board)
Herta Hurnaus (entrance)
Priscilla du Preez, unsplash.com
Melinda Nagy, stock.adobe.com
FloxyArt, stock.adobe.com
Thapana_Studio, stock.adobe.com


CASINOS AUSTRIA

 **österreichische
LOTTERIEN**