



Policy for the Prevention of Corruption

by



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"The fight against corruption is one of the main global challenges.

In fact, corruption is a major obstacle to sustainable development and democracy and has a devastating effect especially on poorer communities. The impact of corruption on the private sector is also considerable; it impedes economic growth, distorts competition between companies and presents serious legal and reputational risks for companies. Corruption is also very costly for companies: according to a World Bank estimate, in many areas of the world, companies have a cost mark-up of around 10% precisely due to corrupt practices. The World Bank has estimated that corruption has become a \$1 billion industry. "¹

Giochi del Titano's Commitment

Giochi del Titano S.p.A. rejects and opposes, as far as it is able, all forms of corruption in the broadest sense of the term, such as "abuse of power for private ends "² and corrupt practices involving the promise, inducement, incitement, request or offer of incentives or other benefits as a reward for the performance or omission of actions, whether or not due. The culture of legality is at the heart of Giochi del Titano S.p.A.'s way of doing business, and it is for this reason that the necessary compliance with current legislation and the need to ensure conditions of fairness and transparency in the conduct of business and corporate activities to protect its position and image, the work of its employees and the gaming activities of its customers are constantly affirmed.

This Policy contributes to increasing general compliance with laws and international good practices and, in order to concretely implement the culture of legality and the prevention and fight against corruption, Giochi del Titano S.p.A. has strengthened its control system by adopting an organisation, management and control model pursuant to Law 99/2013, and has equipped itself with a management system for the prevention of corruption that complies with the UNI ISO 37001:2016 Standard and Anti-Corruption Guidelines.

Each person carrying out activities on behalf of the Company is required to read and understand the contents of this Corruption Prevention Policy and to behave in accordance with its provisions, the laws and regulations of the countries in which the Company operates.

¹ Ref. Principle X of the UN Global Compact.

² Transparency International's definition of corruption

Objectives of the Policy for the Prevention of Corruption

Giochi del Titano S.p.A.'s Policy for the Prevention of Corruption aims to achieve the following objectives:

- prohibit corruption and ensure the achievement of higher compliance with national and international anti-corruption regulatory standards.
- ensure the sustainability, honesty and transparency of its *business* by counteracting any wrongdoing.
- contribute to the dissemination of the culture of doing business by upholding loyalty, integrity, honesty, competition and transparency as a fundamental element of work.
- promote and develop ethics in economic relations to protect the market, combating all forms of illegality.
- adopting the management system for the prevention of corruption as a tool for effectively combating corrupt phenomena by requiring continuous management commitment and *leadership* and by strengthening the system of controls at every level of the organisation.
- develop or nurture awareness of the commitment to preventing and combating corruption on the part of all *stakeholders*.
- create an integrated control system that can be easily understood, implemented and monitored to ensure the effectiveness and efficiency of the preventive function of control.
- encourage reports of any suspected corrupt act, whether attempted, certain or alleged, by means of dedicated channels and methods which, while still safeguarding the Company's reputation and image, allow, on the one hand, investigations and in-depth analyses to be carried out in order to assess their justification and prepare effective countermeasures and, on the other hand, to ensure protection of the reporter against any form of retaliation.

Commitments to the Anti-Corruption Policy and Accountability

Giochi del Titano S.p.A. stigmatises, condemns and in any case rejects corruption and incitement to commit corrupt practices, whether active or passive, direct or indirect, involving public

officials or persons in charge of a public service (or similar figures in foreign countries) or involving and between private individuals, both nationally and internationally, and undertakes to oppose them, in compliance with national legislation, international conventions and guidelines and best practices.

Giochi del Titano S.p.A. adopts organisational instruments capable of making the prevention of and fight against corruptive phenomena effective and feasible, and to this end adopts an integrated control system that is easy to understand, implement and monitor in order to guarantee the effectiveness and efficiency of the preventive function of the control itself, and monitors and verifies its suitability and implementation status.

The Company involves senior management in the prevention of corruption on the part of its employees, making them the promoter of a culture in which corruption is not acceptable, and requires them to make a strong and visible commitment to supervise compliance with anti-corruption measures, ethics, and the implementation of internal controls, as well as to implement all measures deemed appropriate for the prevention, identification and reporting of potential violations.

The Company recognises the need for due diligence concerning its stakeholders, in order to reduce the risk of corruption, with the greater the level of investigation the greater the potential crime risk.

Compliance Department for the Prevention of Corruption

Giochi del Titano S.p.A. has established and appointed a specific Compliance Department for the prevention of corruption, endowed with autonomous powers and resources, with the task of supervising and guaranteeing the implementation and operation of the management system for the prevention of corruption. This Compliance Department has been assigned specific powers, faculties and functions for the effective fulfilment of its role.

The Compliance Department for the Prevention of Corruption oversees the design and implementation of the management system and, more specifically:

- checks the update status of the management system documentation;
- is responsible for monitoring, measuring, analysing and evaluating the performance of the system;

- monitors the status of implementation of anti-corruption measures resulting from management reviews, risk assessments, internal and external audits or other checks and investigations;
- assesses the suitability, adequacy and implementation of preventive measures;
- plans *audit* activities;
- provides senior management and the Governing Body with the *report* containing performance information on the management system (status of implementation and effectiveness of actions taken, opportunities for improvement);
- promotes and plans the senior management review;
- can receive reports of attempted, alleged or actual acts of corruption;
- sends specific information to the Supervisory Board when it has direct knowledge of events, acts or situations relating to the risk of corrupt offences being committed;
- promotes and participates in regular meetings with the Supervisory Board;
- assesses reports received on acts of corruption/violation of the corruption prevention system and, if necessary, promotes investigations;
- can attribute powers and powers of action to investigators;
- receives and evaluates investigation reports and takes action to implement appropriate actions;
- advises the organisation's staff on how the management system works and how to report.

Reporting

In accordance with the Whistleblowing Policy, Giochi del Titano S.p.A. encourages any suspicion of an attempted, certain, alleged corrupt act, as well as any alleged or overt breach of this Policy as well as of its own Anti-Bribery Guidelines and management system for the prevention of corruption.

The Company has set up specific reporting channels which, more generally, are reserved for the reporting of alleged violations of rules of professional conduct and/or ethical principles referred to in current legislation - both internal and external - and/or unlawful or fraudulent conduct attributable to employees, members of corporate bodies, group companies and third parties (customers, suppliers,

consultants, collaborators), which may lead, directly or indirectly, to financial and/or reputational damage.

The report must provide all the elements necessary to carry out the checks and verifications required to assess its justification: it must clearly and completely describe the spatial-temporal circumstances of the incident, the personal details or other elements enabling the identification of the person who committed the reported act, or any other persons who may be able to provide information on the events of the report, and indicate/provide any supporting documents.

Any form of retaliation or discrimination affecting working conditions for reasons related to the whistleblowing shall not be permitted against the whistleblower acting in good faith or the person reporting on the basis of reasonable or confidential convictions. Said discrimination includes any unjustified disciplinary action, harassment in the workplace and any other form of retaliation leading to intolerable working conditions.

Similarly, however, it must be emphasised that any form of abuse in relation to reporting, such as, by way of example, intentional defamation or slander, improper use or intentional manipulation of the establishment covered by this Policy, is strictly prohibited. The Company reserves the right to pursue an obviously distorted use of this instrument, considering how abuse of the reporting system significantly risks undermining the entire management system.

Penalty system

The commission of acts in violation of the Anti-Corruption Policy, as well as, more generally, the violation of the rules on the prevention management system and the abuse of reporting activities constitutes a breach of contractual obligations and compliance with corporate rules and triggers the imposition of sanctions as provided for in the corporate system, in addition to criminal and civil consequences.

Training, dissemination and communication

Giochi del Titano S.p.A. establishes and implements specific training plans addressed to its Staff concerning the commitment to the prevention of corruption, the Policy, procedures, protocols and other anti-corruption tools, the international and national anti-corruption legislation and the legislation

on the broader prevention of the risk of crime (L. 99/2013), and aimed at ensuring their dissemination and proper understanding.

Giochi del Titano S.p.A. undertakes to do its utmost to ensure the dissemination, adoption and implementation of this Anti-Corruption Policy among all stakeholders³, to monitor and control its application, envisaging a system of sanctions for the relevant breaches, and to ensure that it is constantly updated. It is also publicly committed to the fight against corruption, to promote and disseminate the culture of legality and the fight against corruption, including by disseminating the Guidelines through publication on its website.

³ If "interested party" or "*stakeholder*" means any person or entity that can influence, be influenced by, or perceive itself to be influenced by a decision or activity (Standard UNI ISO 37001:2016), Titan Games S.p.A. considers the following to be interested parties and *stakeholders* with respect to its corruption prevention system: partners, employees and all those who collaborate with the Company, the local community, the Public Authorities (State Gaming Authority), suppliers, any *partners and* customers as parties interested in being able to use the gaming services provided by Giochi del Titano with the awareness and perception that they are in a situation that is effectively dedicated to preventing and suppressing corruption.