



2025

# Sustainability Report

Making play better for all



## Executive statement



**Robert Chvatal**  
Chief Executive Officer

On behalf of the Board of Directors and the Sustainability Committee, I am pleased to present Allwyn's Sustainability Report (the "Report") for the fiscal year 2025. The report outlines the progress we have made in strengthening the foundations of our sustainability strategy and in further embedding responsible business practices throughout our global operations.

Our purpose – to make play better for all – guides every decision across our markets. We recognise that sustainability in our industry begins with player protection, which is why we invest in advanced technology, data analytics and innovation to ensure a safe and enjoyable experience.

All our lottery markets hold Level 4 Responsible Gaming Certification, the highest level issued by the World Lottery Association (WLA). In addition, our WLA Security Control Standard certification confirms that our systems and data are protected against security threats, safeguarding the information entrusted to us.

With our strong heritage as a lottery-led business, supporting good causes and communities remains fundamental to Allwyn's mission. Together with Formula 1, we launched the F1 Allwyn Global Community Award to recognise and support community projects linked to race locations, delivering measurable social impact beyond the racetrack.

Over the past year, we have further embedded environmental considerations across our operations, including setting an ambition to reduce Scope 1 and 2 emissions by 42% and Scope 3 emissions by 25% by 2030. We currently source 52% of our operational energy from renewable sources, while recognising the scale of effort required to achieve our long-term ambitions.

Our people are at the heart of our success. We continue to invest in their development by building future-ready skills, enabling our teams to thrive in a rapidly changing world. I would like to thank our employees for their commitment, and our shareholders for their trust and long-term engagement.

We believe we can change lives – through responsible entertainment and by creating lasting value for the communities and societies we serve. I invite our stakeholders to explore this report and join us in shaping a more responsible, resilient and sustainable future.

A handwritten signature in black ink, appearing to read "Robert Chvatal". The signature is stylized and written in a cursive-like font.

Sincerely,

**Robert Chvatal**  
Chief Executive Officer, 18 May 2026

## 1. General disclosures

### 1.1. 2025 highlights

# Play



#### To lead in player safety

The Play pillar is built on safer play. Our top priority is player safety, and we work hard to promote responsible gaming in all aspects of our business. We aspire to deliver the highest player protection standards in the industry and consider it at the heart of our purpose to protect underage and vulnerable individuals. We are investing in new and novel approaches to player protection, such as the use of AI in detection tools, to detect risks earlier and set a standard for the wider industry. We continue to share best practice and raise awareness of responsible gaming tools and available support.

#### Key highlights:

#### WLA Level 4 Responsible Gaming

the highest level of certification of our lottery operations in **Austria, Czech Republic, Greece, UK, and US**

#### Launch of the Allwyn player protection lab

as our **research and innovation programme** dedicated to fostering new approaches, concepts and studies in the field of player safety

#### WLA Level 2 Security Controls

the highest level of certification achieved by operations in **Austria, Czech Republic, Greece, UK and US**.

#### Hosting Responsible gaming conferences

focused on player protection and the use of artificial intelligence to enhance risk detection and interventions

[▶ Read more about this pillar on page 36](#)

# People



#### To create opportunities for all

Our people are our greatest strength. We are a purpose-driven organisation where collaboration, agility, and performance can thrive. Our culture is built on trust, shared purpose and ambition, and our teams are united behind a set of common values. We empower our people to make a positive difference by creating workplaces where they feel heard and valued, and by supporting individual ambitions through meaningful opportunities.

As a global business we apply a consistent approach while respecting local identities, expertise and insights from our teams in the markets.

#### Key highlights:

#### Recognised as a Top Employer

for the **fourth year** in Greece

#### Awarded Great Place to Work certification

in **Austria, Greece, North America, and the United Kingdom** (to Allwyn Lottery Solutions)

#### Received a Top Czech Employer award

for 2025 for the **Czech Republic**

#### Best Workplace in Tech and Best Workplace for Women

in Greece

[▶ Read more about this pillar on page 27](#)

## 1. General disclosures

### 1.1. 2025 highlights continued

# Partner



### To change lives for the better

We build purposeful partnerships that create measurable social value in the communities where we operate and beyond. This supports long-term positive change across our pillars of Sport, Culture, Health and Education. Working with trusted partners, we amplify impact through shared expertise, scale and long-term commitment, and help ensure our efforts are targeted where they can make the greatest difference. Our partnerships also strengthen wider areas of our sustainability approach by enhancing inclusion, supporting employee engagement through volunteering opportunities, and contributing to resilient, sustainable communities.

### Key highlights:

#### Launch of Make a Difference Month

to encourage employee volunteering and fundraising in local communities, with paid leave provided as part of the initiative. A total of **247** employees participated, benefiting more than **880 individuals** throughout the community

#### Launch of F1® Allwyn Global Community Award,

together with our partner Formula 1, recognising impactful community projects in Grand Prix host cities. Four community projects in the **Netherlands, Mexico, and the United States** each received €100,000, totalling **€400,000** in awards

[Read more about this pillar on page 43](#)

# Planet



### To minimise environmental harm

The Planet pillar focuses on reducing the environmental footprint of Allwyn's operations and driving responsible practices across the value chain. Priority is placed on mitigating the climate and environmental impacts through active management of greenhouse gas emissions, improved energy and resource efficiency, and the adoption of circular approaches in products and processes. Engagement with partners and suppliers supports the promotion of sustainable behaviour, stronger environmental performance, and responsible waste and life-cycle management.

### Key highlights:

#### New emission reduction targets

for Scope 1 and 2 GHG emissions by **42%** and Scope 3 GHG emissions by **25%** by **2030** relative to 2024 baseline

#### Total carbon footprint

**247 376 t CO<sub>2</sub>e**  
(Market-based)

[Read more about this pillar on page 16](#)

1. General disclosures

1.2. Our vision, purpose and strategy

# Our Purpose: Making play better for all

## Our vision

To be the leading global gaming entertainment company, lottery-led and renowned for our commitment to social responsibility.

## Our strategy



**Accelerate organic growth**



**Selective inorganic growth**



**Deliver operational efficiency**



**Prioritise responsible gaming and CSR**



**Leverage technology, content and brand across strategic priorities**

One tech, one brand, one team

## Sustainability strategy

**To lead in player safety**

➤ Read more on page 36

**To create opportunities for all**

➤ Read more on page 27

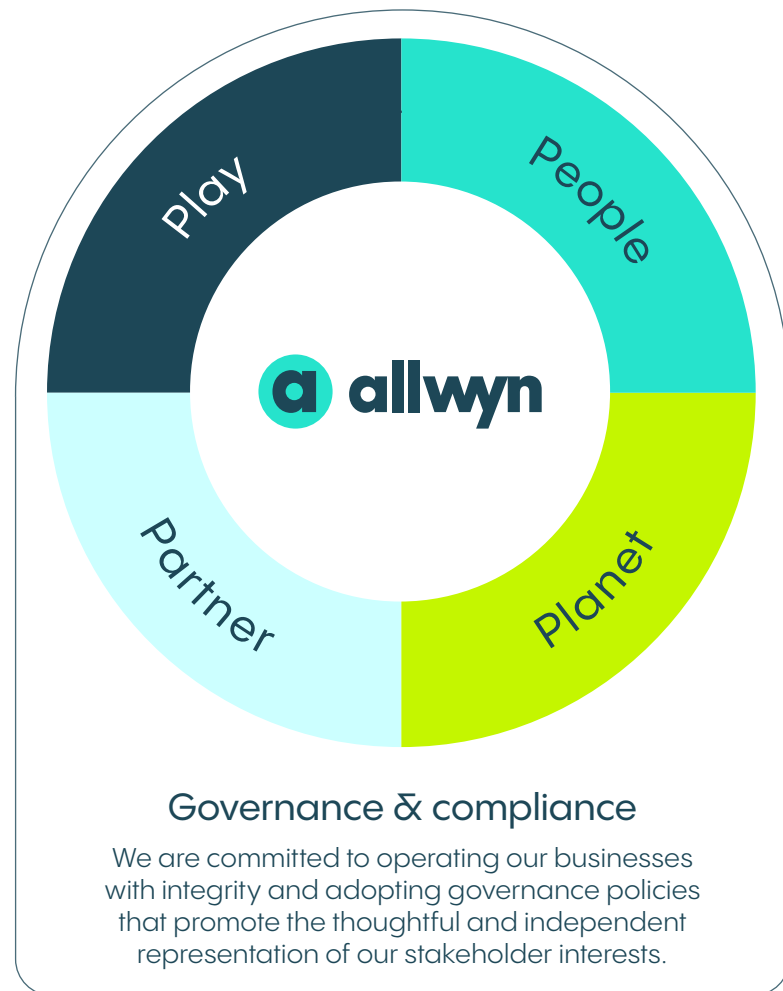


Create playful, rewarding and socially meaningful experiences – globally connected, locally relevant, and entertaining all generations.

## 1. General disclosures

### 1.3. Linking sustainability with strategy and business model

Allwyn addresses its material impacts, risks and opportunities (“IROs”) through a business model and strategy centred on responsible gaming, regulatory trust and long-term value creation.



**Play** We integrate responsible gaming principles throughout the customer journey – across product design, marketing, digital channels and player support. The Group’s Responsible Gaming Strategy operationalises these commitments through Group-wide standards, deployment of player-protection tools and strengthened player-education measures.

While responsible play and regulatory credibility are important across all product verticals, they are particularly critical in lotteries, given the public profile of the product and its concession based structure across multiple jurisdictions. Allwyn has an established track record of enhancing the scale, quality and safety of lottery operations, which is central to licence renewals and participation in new license tender.

**People** People-related impacts are addressed through fair, safe and competitive employment conditions, work-life balance, opportunities for skills development and strict non-discrimination practices. These actions support workforce capability and operational continuity.

**Planet** Climate-related impacts are addressed through actions aimed at reducing greenhouse-gas emissions, including improved energy efficiency and increased use of renewable electricity. Engagement with suppliers supports improved data quality and emissions management across the value chain. Additional resource-efficiency measures such as responsible sourcing, enhanced recyclability and waste-reduction initiatives also form part of Allwyn’s environmental management approach.

**Partner** Through contributions to Good Causes, partnerships and CSR initiatives, we amplify our impact on community development and social cohesion. Allwyn has a strong track record of increasing the scale, quality and safety of lottery operations, with an emphasis on generating returns that support public benefit and governmental objectives.

**Governance & compliance** To mitigate governance, conduct and compliance risks, we maintain robust internal controls covering responsible marketing, anti-corruption, bribery prevention and broader business-conduct expectations. We invest in data protection and cybersecurity, supporting the resilience of our increasingly digital operations.

As identified impacts are prioritised within our daily operations and managed according to their nature and scope, no additional material financial resources – whether operational or capital expenditure – have been allocated, nor are they anticipated to be required for implementing the key actions outlined in this Report.

Overall, **our strategic responses are designed to protect licence integrity, support regulatory expectations, strengthen stakeholder trust, and ensure that opportunities arising from digitalisation, innovation and talent development translate into long-term, responsible value creation.**

# 1. General disclosures

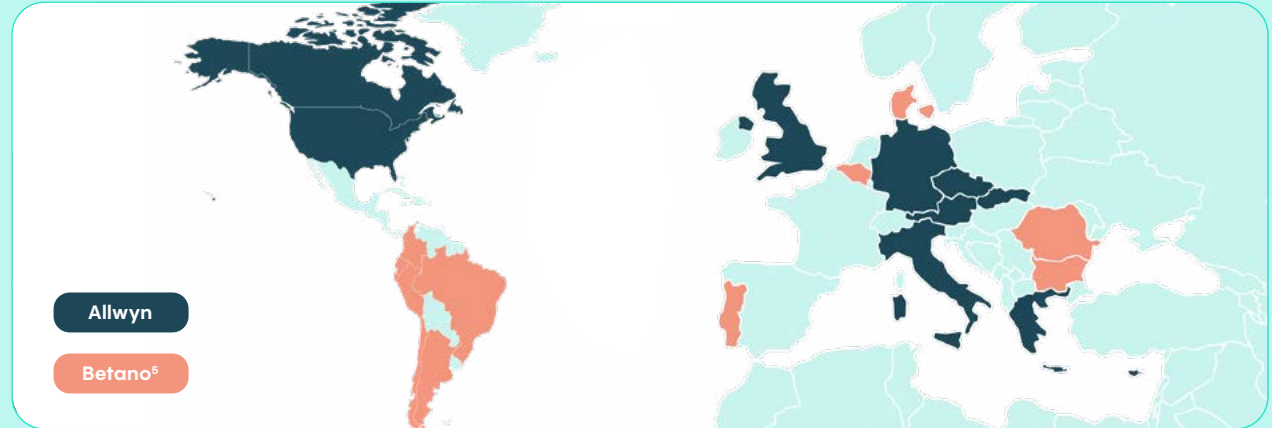
## 1.4. Our business model

Allwyn is a leading global gaming entertainment company, lottery-led with complementary, scaled sports betting, iGaming and daily fantasy sports operations, with a footprint across Europe and North America.

In addition, we have significant capabilities across key parts of the technology stack, including premium internally developed e-instant content, which we also supply to lotteries globally.

Operating primarily under a B2C business model, Allwyn serves as the main point of contact with players. This position necessitates a strong emphasis on player protection and a steadfast commitment to responsible gaming, which is fundamental to the company’s risk management, stakeholder trust and compliance with regulatory standards. More information can be found in our [Annual Report](#).

### Where we operate



**~70%**  
of Adjusted EBITDA<sup>1</sup>: Unique multi-national lottery portfolio with synergistic sports betting and iGaming operations

**~30%**  
of Adjusted EBITDA: Complementary, market leading, high growth assets

**#1**  
operator in 7 lottery markets<sup>2</sup>

**#1**  
sports betting and iGaming operator in Greece

**PrizePicks: #1**  
U.S. DFS operator

**Betano: Strong**  
market positions across Latin America and Europe

**#1**  
sports betting operator in Cyprus

**#1**  
iGaming operator in Austria

**IWG: Leading**  
U.S. e-Instant provider

**Underpinned by proprietary technology, best-in-class content and global brand strategy**

1 Based on 2025 Adjusted EBITDA pro forma for PrizePicks.  
 2 7 markets includes Austria, Cyprus, the Czech Republic, Greece, Illinois (United States), Italy and the United Kingdom.  
 3 Allwyn holds a 36.75% stake in Betano. Betano also present in certain of Allwyn’s countries of operation.  
 4 In Italy, Allwyn holds a 32.5% interest in Lottitalia, a joint venture with Brightstar Lottery PLC.  
 5 Based on publicly available website-traffic rankings (December 2025-February 2026).

## 1. General disclosures

### 1.5. Value chain

We operate at the core of the lottery and gaming value chain, positioned between suppliers of key products, services, and technologies, and the end-players. The company's physical retail presence through third-party partners, including newsagents, tobacconists, together with its digital platforms, provides key customer touchpoints.



#### Upstream

Allwyn's **upstream value chain** consists of suppliers and partners providing inputs, including:

- Gaming materials and equipment, such as paper for tickets and scratch cards, digital game content and software, including betting odds, virtual games, casino games and skill-based games produced by third-party developers.
- Technology infrastructure, comprising IT hardware, servers, retail devices (including leased equipment), cybersecurity, cloud hosting, data storage.
- Operational inputs, including furnishings and maintenance accessories for casinos and stores, utilities and energy to power buildings and venues, catering and logistics for packaging and transporting printed materials.
- Regulatory and authorisation services, provided by certification bodies.
- Professional services, including marketing, legal, administrative and catering services.



#### Own operations

**Own operations** encompass activities directly controlled by Allwyn, including:

- Design, development and management of lotteries, betting and other games.
- Operation of lottery systems, betting platforms, and online channels.
- Management of physical venues, including casinos and VLT stores.
- Licensing activities, including obtaining, renewing and maintaining required operating licences.
- Marketing, player communications and responsible gaming, delivered through Group-controlled platforms.



#### Downstream

**Downstream** activities relate to product use and interaction with players and communities. These include:

- Purchase and use of lottery tickets, betting products, games by players.
- Merchants and venue operators, who supply physical retail space for product distribution.
- Responsible gaming tools and interventions, including information, safeguards and support for at-risk or vulnerable groups.
- B2B distribution, where subsidiaries provide games or platforms to external customers.
- Community contributions, delivered through CSR programmes and sponsorships.

## 1. General disclosures








### 1.6. Interests and views of stakeholders

Allwyn actively communicates with stakeholders in every market where we operate, aiming to understand their expectations, build trust, and make decisions that represent the interests of the individuals and communities we support.

We rely on constructive dialogue with a broad set of stakeholders. The stakeholders that the Group has identified as key affected stakeholders from an ESG perspective are players, employees, society and local communities, retailers and agents, and suppliers;

alongside these, governments, regulators and investors are considered as interested to inform our strategy and guide responsible growth.

Stakeholder input plays a pivotal role in guiding our sustainability priorities, responsible gaming strategies, and the creation of long-term value. We employ structured engagement mechanisms, conduct regular consultations, and implement integrated due diligence activities to transparently identify and manage material impacts, risks, and opportunities. The perspectives and interests of stakeholders provide valuable insights into daily operational matters and contribute to the ongoing review of our strategy by the Board of Directors and Executive Management.

Stakeholder	Engagement methods	Purpose
 <b>Players</b>	<ul style="list-style-type: none"> <li>Awareness campaigns</li> <li>Social media channels</li> <li>Press releases / media articles</li> <li>Satisfaction surveys</li> <li>Communication in stores</li> </ul>	<ul style="list-style-type: none"> <li>Promote our products and offerings</li> <li>Raise awareness of responsible gaming</li> <li>Ensure player satisfaction</li> </ul>
 <b>Employees</b>	<ul style="list-style-type: none"> <li>Regular communication through emails and digital platforms</li> <li>Direct interactions</li> <li>Regular surveys</li> <li>Ongoing performance and development dialogues</li> </ul>	<ul style="list-style-type: none"> <li>Gauge engagement</li> <li>Address concerns</li> <li>Identify areas for improvement</li> </ul>
 <b>Retailers and agents</b>	<ul style="list-style-type: none"> <li>One-to-one meetings</li> <li>Awareness campaigns</li> <li>Satisfaction surveys</li> </ul>	<ul style="list-style-type: none"> <li>Gauge satisfaction</li> <li>Address concerns</li> <li>Identify areas for improvement</li> </ul>
 <b>Suppliers</b>	<ul style="list-style-type: none"> <li>Relationship management and contract agreements</li> <li>Various check-ins during the supplier life cycle, including risk assessment</li> <li>Regular supplier performance reviews</li> </ul>	<ul style="list-style-type: none"> <li>Build long-lasting partnerships</li> <li>Identify and address risks</li> </ul>
 <b>Society and local communities</b>	<ul style="list-style-type: none"> <li>Awareness campaigns</li> <li>Special events and collaborations</li> <li>Direct meetings and other dialogue settings</li> </ul>	<ul style="list-style-type: none"> <li>Enhance collaboration with local community and non-profits</li> <li>Identify actionable strategies with local community and non-profits</li> </ul>
 <b>Investors</b>	<ul style="list-style-type: none"> <li>Results presentations</li> <li>Reports and updates</li> </ul>	<ul style="list-style-type: none"> <li>Deliver updates on strategy and performance</li> <li>Transparency</li> </ul>
 <b>Regulators</b>	<ul style="list-style-type: none"> <li>Direct meetings and other dialogue settings</li> <li>Memberships in trade and industry organisations</li> </ul>	<ul style="list-style-type: none"> <li>Compliance</li> <li>Promotion of social contribution</li> <li>Shape the regulatory framework for the lottery industry</li> <li>Transparency</li> </ul>

## 1. General disclosures



**Kenneth Morton**  
Chief Financial Officer



Investors expect transparency on how sustainability related risks and opportunities may affect a company's financial performance, position, and future cash flows. At Allwyn, sustainability considerations are integrated into our strategy and enterprise risk management processes to identify, assess, and manage matters that are financially material to the Group.

This integration enhances business resilience and supports our ability to anticipate and respond to challenges, including climate related, regulatory, and operational risks. Where relevant, sustainability related risks and opportunities are reflected in governance arrangements, internal controls, and key decision making processes, including capital allocation and future planning.

By embedding sustainability into financial and risk management, Allwyn seeks to limit downside risk, protect asset value, and ensure optimal access to capital. This approach underpins our objective to deliver sustainable long-term value through compounding, profitable growth."

## 1. General disclosures

### 1.7. Double materiality assessment

The Group conducted double materiality assessment (DMA) in 2024 based on the methodology described in the European Sustainability Reporting Standards (“ESRS”) to identify material IROs across its operations and value chain. The process was designed to reflect the way the Group manages its business, engages with internal experts and stakeholders, and uses existing due diligence structures.

The process began with a mapping of the business model and the upstream–downstream value chain, covering activities such as procurement, technology development, retail and digital distribution, and player interaction. The scope of the materiality assessment included all major activities and geographical regions in which the Group operates.

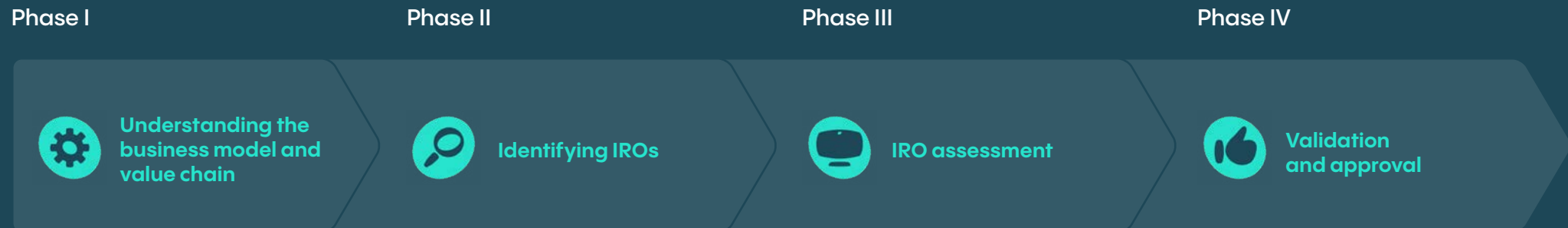
IROs were identified within the topics outlined in ESRS 1 supplement A/AR 16, using internal data, external standards (like GRI and EL Sustainability Guidelines), industry comparisons, and databases such as ENCORE. Due diligence details – supplier audits, surveys, stakeholder feedback, and regulatory reporting documentation – were also incorporated and assessed through expert interviews.

The Group prioritised activities and business relationships most likely to present risks of negative impacts, including procurement, player management, key suppliers, employee management, and governance. This review considered direct impacts from the Group’s actions as well as those from its business partners, resulting in a validated list of impacts, risks, and opportunities.

Key stakeholders involved included specialists from human resources, procurement, legal, and compliance, who have a broad understanding of the Group’s operations. Additional inputs from other stakeholders also informed the identification process.

Materiality of IROs was assessed on a five-point scale for severity (scale, scope and irremediability) and likelihood, while financial risks and opportunities were evaluated using historical financial effects and forward-looking estimates, including climate-related analysis based on IPCC RCP4.5 and RCP8.5 scenarios, with those rated “Important” or higher considered material. The Group’s enterprise risk management framework provided additional validation and ensured alignment with existing regulatory, business and financial risk oversight. The consolidated results were reviewed by the Global ESG team members, validated by senior management and approved by the Board, with updates expected in 2026 to reflect the revision of the ESRS.

#### Our approach



# 1. General disclosures

## 1.8. Material impacts, risks and opportunities and disclosure requirements included in the sustainability statement

The table provides an overview of the identified material IROs and associated topics along with the associated position in Allwyn’s value chain and time horizon. Although there are no substantive changes relative to the previous year, we have revised the presentation of identified IROs, along with their related material topics and sub-topics.

**Value chain location:** Upstream Own operation Downstream

**Time horizon:** Short-term Medium-term Long-term

**IRO:** Impact Actual Negative Impact Actual Positive Impact Potential Negative

Risk Opportunity

Sustainability topic	Sustainability sub-topic	IRO	IRO name	IRO description	Value chain location	Time horizon
E1 Climate Change	Climate change mitigation		Production of CO <sub>2</sub> e emissions contributing to climate change	Procuring goods and services, as well as consuming energy from non-renewable sources for own operations, results in the emission of greenhouse gases into the atmosphere. This contributes to global warming and subsequent climate change		
E5 Circular economy and resource use	Resource inflows		Use of paper for scratchcards, tickets and other promotion materials	Using and commissioning the creation of products that require primary resources, such as wood for paper production, contributes to resource depletion.		
S1 Own Workforce	Working conditions	  	Workplace defined by fairness, well-being, and safe, supportive working conditions	Effective social dialogue with trade unions and employee representatives can have a positive impact on employees by contributing to improved working conditions.  Fair remuneration, safe working conditions, and employee protection systems can positively impact employee well-being and workplace safety, creating a safe, inclusive, and supportive working environment.  Certain part of our operations are more prone workplace accidents. If occupational health and safety risks were not adequately identified, prevented, or managed, this could result in negative impacts on employees’ physical and mental health, including injury, illness, or work-related stress.		
S1 Own Workforce	Diversity and equal treatment		Unbiased, non-discriminatory practices in recruitment, promotion, and employee recognition	Discrimination can result in unequal treatment and reduced employee well-being and satisfaction. Promoting non-discriminatory practices in recruitment, promotion, and employee recognition supports equal opportunities and fosters an inclusive and respectful multicultural workplace.		
S1 Own Workforce	Training and skills development		Employee skills, capability & competency development	Implementing structured programmes and initiatives aimed at improving employees’ knowledge, competencies, and abilities ensures effective performance in current roles and supports adaptation to evolving job requirements or career advancement.		
S1 Own Workforce	Other labour-related rights		Loss of privacy and confidentiality through unauthorised disclosure or access to employee data	Failures in the protection of employees’ personal data may lead to misuse or unauthorised access to sensitive information, resulting in negative impacts on employees’ privacy and personal security, including potential financial, psychological, or reputational harm.		

# 1. General disclosures

## 1.8. Material impacts, risks and opportunities and disclosure requirements included in the sustainability statement continued

**Value chain location:** Upstream Own operation Downstream

**Time horizon:** Short-term Medium-term Long-term

**IRO:** Impact Actual Negative Impact Actual Positive Impact Potential Negative

Risk Opportunity

Sustainability topic	Sustainability sub-topic	IRO	IRO name	IRO description	Value chain location	Time horizon
<b>S4</b> Responsible Gaming	Personal safety of end-users		Preventing harm to players and underage participation	Inadequate responsible gaming and marketing practices may result in excessive gambling, harm to vulnerable players, underage participation, and loss of customer trust.		
<b>S4</b> Responsible Gaming	Information-related impacts for users		Protecting data privacy	Inadequate handling of customer and end-user data may result in privacy breaches and cybersecurity incidents, leading to identity theft, financial loss, or other personal harm.		
<b>S4</b> Responsible Gaming	Personal safety of end-users		Potential risk of not meeting responsible gaming practices	Inherent risk of non-compliance with complex and evolving responsible gaming regulations, which may result in regulatory sanctions, financial penalties, and reputational damage.		
<b>G1</b> Business Conduct	Corporate culture		Ethical conduct and anti-corruption are core to corporate culture.	Inadequate standards of conduct, weak anti-corruption controls, or non-compliance with applicable rules may result in negative impacts on individuals, the Group culture and society.		
<b>G1</b> Business Conduct	Corporate culture		Responsible business conduct supports our role as a reliable partner to governments and regulators	Ethical and compliant operations, together with strong responsible gaming practices, create an opportunity for Allwyn to strengthen its reputation as a trusted and responsible lottery and gaming operator, supporting long-term partnerships with governments and regulators and enhancing stakeholder confidence.		
<b>G1</b> Business Conduct	Corporate culture		Potential risk of not meeting regulatory and stakeholder expectations for licences, concessions, and social investments	Weak conduct and compliance practices may undermine trust, leading to failure to meet regulatory and stakeholder expectations for licences, concessions, and social investments, with potential regulatory and reputational consequences.		
<b>G1</b> Business Conduct	Cyber security		Potential risk to prevention of cyberattacks and loss of sensitive data	Cyberattacks can have severe consequences, including data loss, financial damage, reputational harm, and legal implications. They may result in lawsuits and regulatory fines, further increasing financial exposure.		
<b>G1</b> Business Conduct	Social investments		Contributing to the public good through targeted social responsibility initiatives	Through CSR strategy and community investments, supporting initiatives that promote health, education, inclusion, and community well-being in partnership with stakeholders, generating positive social impacts by expanding opportunity and strengthening communities across its markets.		

# 1. General disclosures

## 1.9. Governance over sustainability reporting and management

**The Board of Directors** (“The Board”) has ultimate accountability for sustainability oversight, ensuring that material impacts, risks, and opportunities are effectively incorporated into the company’s strategy, risk management, and performance monitoring.

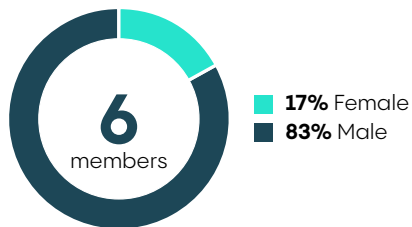
This includes supervision of issues that may influence strategic direction or involve risk and compliance, as well as overseeing decision-making processes related to significant transactions. These matters are addressed through dedicated reviews and regular updates from the **Sustainability Board Sponsor and the Sustainability Executive Sponsor** (the “Sponsors”).

**The Sustainability Committee** (the “Committee”) serves as a strategic advisory body to the Sponsors, guiding and overseeing the implementation of Allwyn’s sustainability strategy, including setting targets, recommending sustainability-related strategic initiatives and monitoring progress. Its responsibilities are formalised in the Committee charter and include ensuring compliance with international sustainability standards and regulatory requirements, promoting transparency and ethical governance in sustainability disclosures and reporting. The Committee cooperates with the **Audit Committee**. While deciding on ambition level, roadmaps and funding, the Committee consults **Executive Management** for the relevant material topics.

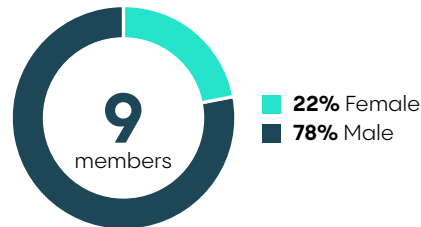
The operational responsibility is anchored by the Sustainability Executive Sponsor (Global Chief Brand Officer) who collaborates closely with the **Global Sustainability Managers** and the **Global Sustainability Team**, that consists of local sustainability teams from each operating entity, to drive accountability and oversee the strategic alignment between Allwyn’s sustainability initiatives and the “One Allwyn” strategy. Whenever feasible, the management of material matters is integrated into existing business processes.

This sustainability governance ensures that the Board has access to the skills and expertise needed to oversee and address Allwyn’s material sustainability matters.

### Board gender diversity\*



### Management gender diversity



\* 2 independent and 5 non-executive members

Sustainability Committee Composition as of 31 December 2025

Role	Title	Name
<b>Sustainability Board Sponsor</b>	Chief Executive Officer	Robert Chvatal
<b>Sustainability Executive Sponsor/ Chair</b>	Chief Brand Officer	Tatiana Jouanneau
<b>Member</b>	Chief Financial Officer	Kenneth Morton
<b>Member</b>	Group General Counsel	Jonathan Handyside
<b>Member</b>	Head of Investor Relations	Nick Edelman

### ESG governance framework



## 1. General disclosures

### 1.10. Risk management and internal controls over sustainability reporting

The 2025 Report serves as a further preparatory step for mandatory reporting. The Group is aligning its sustainability reporting control environment with established processes for financial reporting, enhancing internal controls.

The **Internal Audit** functions conduct independent audits to assess readiness for the mandatory reporting, including the design and effectiveness of control processes.

The **Sustainability Committee** and the **Audit Committee** oversee sustainability reporting and are informed of progress. This Report is not subject to an external audit.

The methodology for calculating and presenting sustainability metrics is detailed in the Additional information section. Data is gathered from the Group's operational units, utilising local management systems, and typically originates from process data systems calculations, and purchasing data. Controls are implemented to ensure the completeness and accuracy of the reported information. Nevertheless, the absence of universally accepted reporting standards and practices for certain data, coupled with the scope of the sustainability statement, may introduce uncertainties into this information.

**Identified risks** relating to sustainability reporting for 2025 primarily concern the data reported for the value chain, as the Group does not have operational control over this, and the manual data collection and consolidation process, as these are prone to risks of misstatements and errors (intentional and non-intentional). Controls are in place to support the completeness and accuracy of sustainability reporting. As with any non-financial reporting, residual risks remain due to estimation of uncertainty and reliance on third-party and value-chain information and are monitored through established governance processes.

Allwyn's approach to managing risks, including sustainability-related risks, is anchored in its Risk Management Framework, which is designed to identify, document, monitor and manage risks across all Group functions and markets. The **Group Risk Taxonomy** defines and classifies the full range of risks faced or potentially faced by the Group. This taxonomy ensures that sustainability-related risks – including **responsible gaming, cyber & information security, regulatory & compliance** – are integrated into the broader enterprise risk landscape and managed through established governance and control processes.

For the reporting period, no material sustainability related risks were identified as having resulted in financial effects for Allwyn. While the controls and certifications described in the Report mitigate these risks, residual regulatory, operational, behavioural and external risks remain and are monitored through the Group Risk Management Framework.

### 1.11. Basis for preparation of sustainability statement

The 2025 Report has been prepared on a consolidated basis with the scope being the same as for the financial statements prepared covering the parent company Allwyn International AG and its subsidiaries and equity method investees (the "Group", "Allwyn", "we", "our" or "us").

Our Sustainability statement is prepared with reference to the ESRS, reflecting the Delegated Regulation (EU) 2025/4812, Delegated Regulation (EU) 2026/73 and in preparation for reporting under the Directive (EU) 2026/470. This report also contains disclosure related to Article 964 of the Swiss Code of Obligations (CO) in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour.

Although the Report references the ESRS, it has been adjusted in structure and terminology as part of our progress towards meeting CSRD requirements. As permitted by the standard, we omitted all information about anticipated financial effects, certain S1-metrics and selected value chain information. The Report covers material information about our value chain, including its upstream and downstream part, based on the results of the double materiality assessment. We have not opted to omit any information related to intellectual property, know-how, innovation outcomes, impending developments, or ongoing negotiations. The time horizons applied in preparing the Report follow ESRS guidance: up to one year (short-term), one to five years (medium-term), and more than five years (long-term).

Metrics for our own operations are mainly based on primary data, while value chain metrics rely more on estimates and therefore carry greater uncertainty. Assumptions, uncertainties and estimates are described in the relevant accounting policies. Forward-looking information, including targets, is inherently uncertain.

In some cases, these forward-looking statements can be identified by the use of forward-looking terminology, including the words "believes," "estimates," "anticipates," "expects," "intends," "may," "will," "plans," "continue," "ongoing," "potential," "predict," "project," "target," "seek" or "should", or, in each case, their negative or other variations or comparable terminology or by discussions of strategies, plans, objectives, targets, goals, future events or intentions.

This Report covers the financial year ended 31 December 2025. References to 2026 reflect post-period developments and forward-looking assumptions.

These forward-looking statements include all matters that are not historical facts. They appear in a number of places throughout this Report and include statements regarding our intentions, beliefs or current expectations concerning, among other things, results of the Group's operations, strategies and the industry in which the Group operates. By their nature forward-looking statements involve known and unknown risks and uncertainties because they relate to events and depend on circumstances that may or may not occur in the future.

Forward-looking statements are not guarantees of future performance. You should not place undue reliance on these forward-looking statements. Any forward-looking statements are only made as of the date of this Report and the Group does not intend, and does not assume any obligation, to update forward-looking statements set forth in this Report.

# Environment

**E1** Climate change [▶](#)

**E5** Circular economy [▶](#)

## 2. Climate change

Aligned with **ESRS E1 – Climate change mitigation**, this chapter outlines our policies, actions, and performance across Climate Change, reflecting our material environmental impacts.

Sustainability topic	IRO name	IRO classification
Climate change mitigation	Production of CO <sub>2</sub> e emissions contributing to climate change	IAN

IAN – Impact Actual Negative

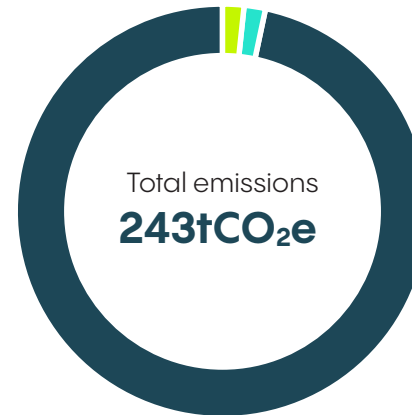
### 2.1. Reducing climate impacts

Allwyn’s activities generate material climate-related impacts, primarily within its upstream and downstream value chain.

The **main sources** of greenhouse gas emissions relate to the **procurement of goods and services, technology and infrastructure investments, construction and refurbishment activities, and the distribution and operation of lottery and gaming products (Scope 3)**. In selected markets, we also run or lease retail outlets, distribution centres and gaming venues, contributing to our own environmental footprint, particularly in terms of energy consumption. However, our direct operational emissions (Scope 1 and Scope 2) still represent a limited proportion of total emissions (less than 4%).

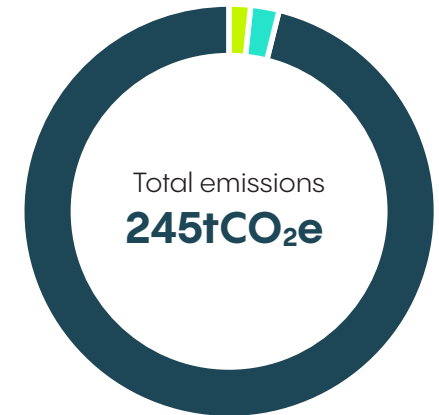
Without implementing proactive strategies, the growth of our business operations would result in an increased carbon footprint, which may elevate transition, regulatory, and reputational risks. To mitigate these concerns, we are introducing sustainable initiatives designed to systematically decrease our carbon emissions and strengthen our operational resilience.

Market-based emissions 2025 (thousands)



1.7% Scope 1  
1.5% Scope 2  
96.9% Scope 3

Location-based emissions 2025 (thousands)



1.7% Scope 1  
2.3% Scope 2  
96.0% Scope 3

## 2. Climate change

### 2.2. Climate-related risks and resilience analysis

We evaluated climate risks by examining both **physical (chronic and acute) and transition risks, using two IPCC climate scenarios: RCP4.5** (a moderate scenario with limited climate policies) and **RCP8.5** (a high emissions scenario). Our analysis covered **short-term impacts, medium-term effects up to 2030, and long-term projections through 2050.**

**The physical risk analysis** focused on key assets that significantly contribute to revenue and whose loss or changes in cost structure could affect profitability. It considered the technical and moral lifespan of each asset, along with our plans.

Climate risk assessment covered the following physical risks:

- **Chronic:** changing temperature, heat stress, temperature variability, permafrost thawing, changing wind patterns, changing precipitation patterns and types, precipitation or hydrological variability, water stress, coastal erosion.
- **Acute:** heat wave, cold wave/frost, wildfire, cyclones/hurricanes/typhoons, storms, tornado, drought, heavy precipitation, flood, glacial lake outburst, avalanche, landslide, subsidence.

**These risks across all scenarios, irrespective of geography were identified as heightened exposure:**

- **Temperature** – average and maximum temperature
- **Heat** – heat stress, heat wave, cooling requirements
- **Drought** – water stress

The findings from the physical risks analysis, together with detailed analysis of our carbon footprint, served as an input for **transition risks analysis** along **political, technological, market and reputational risks.** The group also considered legal and social factors, along with changes in the business environment.

Potential climate risks for our operations include **higher energy costs from increased cooling needs for physical assets, as well as greater reliance on digital technologies, which raises exposure to IT suppliers and energy demands for data processing.**

After considering mitigating factors including changes in international and national policies, progress in low-carbon technologies, and the varied nature of our operations, climate-related risks are not expected to constitute a significant threat to the resilience of our business model.

### 2.3. Policies

Allwyn's **Sustainability Policy** states our commitment to reducing greenhouse gas emissions and minimising environmental impact, recognising climate change and transitioning towards a more sustainable future.

Our key markets (such as Austria, Greece and the United Kingdom) have developed their own sustainability and environmental policies. These are aligned with the Group-wide framework but also reflect specific regulatory requirements and stakeholder expectations in each market.

We adhere to environmental regulations and are committed to reducing the impact of our operations. Allwyn monitors progress on environmental initiatives by systematically collecting data related to greenhouse gas emissions. To ensure comprehensive sustainability across our value chain, we integrate sustainable practices into our procurement and business travel policies.

### 2.4. Targets and transition plan

In 2024, we performed a thorough assessment of our carbon footprint covering all three emission scope (according GHG Protocol), designating this as the baseline year for **newly established emissions reduction targets.** These targets are integral to our **transition plan, which is currently being formalised.**

2030

# 42%

reduction in Scope 1 and 2 emissions relative to a 2024 baseline

Ambition: 1.5°C aligned

2030

# 25%

reduction in Scope 3 compared with 2024 baseline

Ambition: Well-below 2°C

## 2. Climate change

### 2.4. Targets and transition plan continued

Year	Scope 1 and 2 GHG emissions – market-based		Scope 3 GHG emissions (Targeted)	
	Change	Change	Change	Change
2024 base	11,886	N/A	218,079	N/A
2025	7,759	-34%	205,836	-3.4%
2030	6,894	42%	163,559	25%

These objectives follow the Science Based Targets initiative (SBTi) framework, which is recognised as an industry standard for responsible environmental actions.

The near-term targets address the majority of the Group’s emissions, including total Scope 1 and Scope 2 emissions, as well as emissions from key Scope 3 categories: purchased goods and services, capital goods, and fuel- and energy-related activities. Collectively, the targets represent over 70% of the Group’s total baseline GHG emissions.

The setting of Allwyn’s emission-reduction targets was a comprehensive exercise informed by carbon footprint calculations, scenario analysis, projected business growth, market-specific conditions, supplier transition readiness and the availability of low-carbon solutions, as well as feedback from key stakeholders. Building on these inputs, Allwyn is developing a comprehensive **decarbonisation plan** that consolidates existing actions and identifies initiatives expected to deliver meaningful emissions reductions across own operations and the value chain.

To achieve our ambition, we plan **to transition to renewable energy where possible, invest in energy-efficient technologies across retail and digital platforms, and collaborate with partners to decarbonise the supply chain**. Progress will be reported annually in our Sustainability disclosures, ensuring transparency and accountability.

The delivery of Allwyn’s emissions-reduction measures is subject to several **operational and external constraints**. Key obstacles include the availability and cost of renewable electricity in certain markets, limitations in local energy and charging infrastructure affecting the pace of electrification, and the technical and contractual constraints associated with upgrading existing assets. For Scope 3, progress is influenced by supplier readiness, data availability, and the maturity and affordability of low-carbon alternatives for goods and services. These factors may affect the timing and scale of emissions reductions, particularly in the near term, and will be reflected in the assumptions of our transition plan.

The plan will be integrated into Allwyn’s global Sustainability strategy and supports the management of climate-related transition risks and long-term value creation, with progress monitored through interim milestones to assess alignment with targets and underlying assumptions over time.

Emissions broken down by categories		† CO <sub>2</sub> e
Goods and services purchased		142,963
Franchises		31,479
Capital goods		28,711
Investments		12,223
Employee commuting with WTT		7,116
Use of sold products and services		4,875
Electricity with WTT		4,633
Fuels for mobile sources with WTT		3,325
Business trips and accommodation with WTT		2,995
Transportation to company with WTT		1,701
Natural gas with WTT		1,453
District heating and cooling with WTT		463
Waste		244
Disposal of sold products		222
Refrigerant leakage		135
Fuels in stationary sources with WTT		110
Upstream leased assets		9

Footprint per one employee

0.96

[Scope 1-2] tCO<sub>2</sub>e

Footprint per net revenue (Scope 1-2)

1.89

t CO<sub>2</sub>e / mil. EUR

Footprint per one employee

30.18

[Scope 1-3] tCO<sub>2</sub>e

Footprint per net revenue (Scope 1-3)

59.01

t CO<sub>2</sub>e / mil. EUR

## 2. Climate change

### Cutting carbon through energy monitoring, renewables, and sustainable mobility

**Casinos Austria & Austrian Lotteries Group** has implemented a **structured, data-driven programme to reduce greenhouse gas emissions** and improve energy efficiency across its operations. The initiative was initiated in response to regulatory requirements for transparent reporting of environmental performance and the need for accurate, decision-useful data.

The first phase focused on the rollout of a comprehensive **energy monitoring system** across all Austrian casino locations. Sensors were installed to capture detailed energy consumption data, enabling the identification of high-consumption areas and supporting targeted efficiency measures. This approach allows the company to transition from baseline measurement to active energy optimisation and informed investment planning.

Based on this monitoring, the company has set a **target to reduce annual energy consumption** by approximately **400,000 kWh**, equivalent to around **144 tonnes of CO<sub>2</sub> emissions**. Alongside efficiency improvements, the Group has invested in **renewable energy capacity**, including the installation of **solar photovoltaic** systems across selected sites. These installations generate approximately **600,000 kWh of renewable electricity annually**. As a result of these combined actions, **renewable sources now account for 66% of the Group's total energy consumption**.

In parallel, the programme supports the transition to lower-emission mobility. During 2024, **EV charging infrastructure was expanded** across casino locations and corporate facilities, providing charging points for both fleet and employee use. This infrastructure supports the Group's long-term objective of fully electrifying its vehicle fleet by 2030, while also encouraging behavioural change among employees and visitors.

A key success factor for the programme has been the integration of environmental and economic considerations into the business case. Investments were assessed based on both cost efficiency and their contribution to emissions reductions, which supported management approval and stakeholder alignment.

Overall, the initiative demonstrates how **combining data-driven energy management, renewable energy deployment, and infrastructure investment** can deliver measurable emissions reductions, support regulatory compliance, and contribute to broader climate targets, including Austria's ambition to reach climate neutrality by 2040.



Photovoltaic systems, Casino Baden, Austria

## 2. Climate change

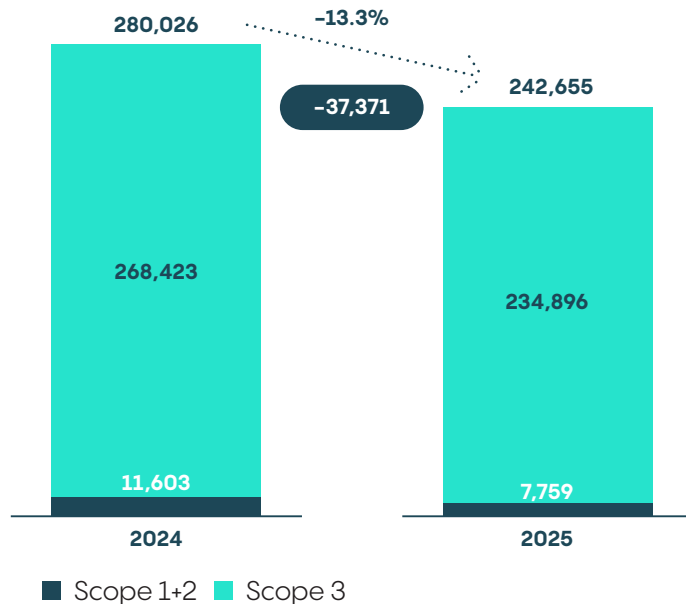
### 2.5. Scope 1, 2 and 3 GHG emissions

Compared to 2024, Allwyn's year-on-year carbon footprint performance varied across its portfolio, though the overall trend was downward.

In addition to improved calculation methods, enhanced data quality, and more accurate supplier information, key progress resulted from targeted decarbonisation initiatives by Allwyn UK and the relocation of Allwyn North America to a new, energy-efficient facility. These achievements were partially counterbalanced by factors such as business expansion, increased staffing, higher office space occupancy, and elevated purchases of goods and services, as well as methodological updates.

Ultimately, the 2025 results reflect both operational developments and ongoing improvements in methodological accuracy and data quality across the Group.

GHG emissions trend (tCO<sub>2</sub>e)



Gross greenhouse gas emissions	2025	2024	Change
<b>Scope 1 GHG emissions</b>			
Gross Scope 1 GHG emissions (tCO <sub>2</sub> e)	4,093	5,263	-22.2%
Percentage of Scope 1 GHG emissions from the EU Emissions Trading System (EU ETS) (%)	0	0	0
<b>Scope 2 GHG emissions</b>			
Gross location-based Scope 2 GHG emissions (tCO <sub>2</sub> e)	5,636	11,858	-52.5%
Gross market-based Scope 2 GHG emissions (tCO <sub>2</sub> e)	3,666	6,340	-42.2%
<b>Significant scope 3 GHG emissions</b>			
Total gross indirect (Scope 3) GHG emissions (tCO <sub>2</sub> e)	234,896	268,423	-12.5%
1. Purchased goods and services	142,963	137,960	3.6%
2. Capital goods	28,711	29,888	-3.9%
3. Fuel and energy-related activities (not included in Scope 1 or Scope 2)	2,684	4,176	-35.7%
4. Upstream transportation and distribution	1,668	1,937	-13.9%
5. Waste generated in operations	244	146	66.6%
6. Business travel	2,879	2,693	6.9%
7. Employee commuting	6,941	6,706	3.5%
8. Upstream leased assets	9	N/A	N/A
9. Downstream transportation	N/A	N/A	N/A
10. Processing of sold products	N/A	N/A	N/A
11. Use of sold products	4,875	12,595	-61.3%
12. End-of-life treatment of sold products	222	310	-28.5%
13. Downstream leased assets	N/A	N/A	N/A
14. Franchises	31,479	46,131	-31.8%
15. Investments	12,223	25,880	-52.8%
<b>Total GHG emissions</b>			
Total GHG emissions (location-based) (tCO <sub>2</sub> e)	244,625	285,544	-14.3%
Total GHG emissions (market-based) (tCO <sub>2</sub> e)	242,655	280,026	-13.3%

## 2. Climate change

### 2.6. Energy mix

In 2025, renewable energy accounted for nearly 52% of the Group’s total energy consumption. Overall energy use across the Group amounted to 68,943 MWh, with the majority of electricity sourced from national grids.

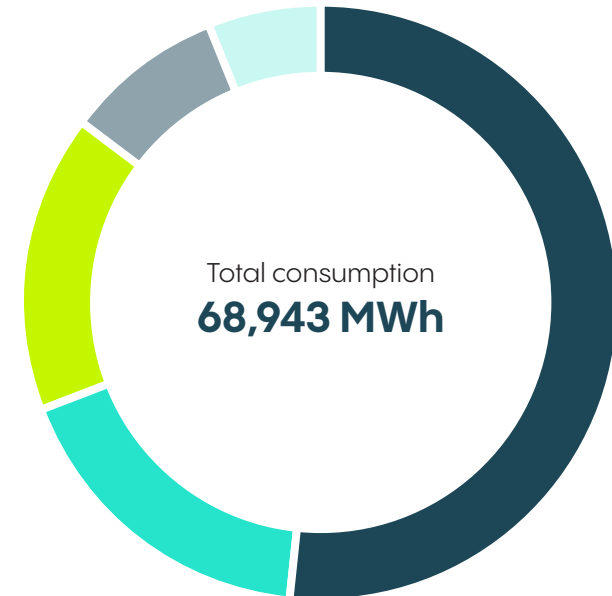
The majority of electricity consumed is sourced from national grids. In Austria, the energy mix provided by national suppliers features a higher proportion of renewable sources, further enhanced by proprietary renewable resources. Allwyn’s markets employ several contractual instruments to oversee energy procurement, with the Guarantee of Origin serving as the principal mechanism across regions.

The Group’s 2025 energy consumption profile indicates a high share of non-fossil energy sources in the overall energy mix. Purchased energy from renewable sources represented 51.9% of total reported energy consumption, making it the single largest energy category. The reported energy mix also included 4.7% purchased energy from nuclear sources.

Overall, this indicates that **low-carbon purchased energy represented a substantial part of the Group’s total energy consumption in 2025.**

Energy consumption		MWh
Purchased energy from renewables	51.9%	35,772
Purchased energy from fossil fuels	17.3%	11,957
Fuel consumption of oil and petroleum products	16.1%	11,073
Natural gas fuel consumption	8.7%	5,986
Purchased energy from nuclear sources	4.7%	3,260
Fuel consumption of other fossil fuels	0.7%	501
Energy consumption produced by the company	0.6%	396

### Energy consumption



- 51.9% Purchased energy from renewable sources
- 17.3% Purchased energy from fossil fuels
- 16.1% Fuel consumption of oil and petroleum products
- 8.7% Natural gas fuel consumption
- 6.0% Other

## 2. Climate change

### Allwyn's Approach to Climate Action

#### Comprehensive Greenhouse Gas Emissions Assessment

Allwyn laid the foundation for science-aligned climate action by assessing its greenhouse gas emissions across Scope 1, Scope 2, and relevant Scope 3 categories according to the GHG Protocol. This initiative marked a further step in climate reporting maturity, with 2025 marking the second consecutive year of data collection across all three scopes at Group level. Given the Group's diverse geographic footprint, varied operating models, and decentralized data ownership, compiling the emissions inventory required considerable coordination to standardize processes, definitions, and methodologies.

#### Challenges in Data Collection

Collecting emissions data was particularly challenging for Scope 3 due to inconsistencies in data availability, granularity, and comparability across suppliers, partners, and markets. Primary operational data was used where possible, trying to minimise the usage of estimates.. Further difficulties arose from differences in local reporting, historical data, evolving methodologies, and the need to align organisational boundaries after structural changes. To ensure transparency and ongoing improvement, Allwyn documented all material assumptions, boundaries, and limitations.

#### Analysis of Major Emission Sources

With a baseline established, Allwyn examined its principal emission sources within operations and the broader value chain. Most climate impact comes from upstream and downstream activities, so understanding Scope 3 emissions was prioritized despite data constraints. Decarbonisation scenarios assessed reduction potential from energy efficiency, renewable electricity, electrification, procurement changes, and supplier engagement. The analysis accounted for uncertainties related to data quality, supplier readiness, timelines, and external influences including infrastructure, technology, and regulations.



Allwyn offices, Borislavka Centrum Prague, Czech Republic, meets the LEED Gold certification standard

## 2. Climate change

### Allwyn's Approach to Climate Action

#### Science-Aligned Targets and Transition Pathway

The assessment guided the creation of science aligned emission reduction targets and a transition pathway consistent with a 1.5°C trajectory. Near-term measures focus on areas with robust data and direct operational control, while medium- and long-term actions target structural reductions across the value chain. This phased strategy reflects the complexity of Allwyn's operations and anticipates ongoing improvements to data, methodologies, and supplier engagement—especially for Scope 3—as reporting and collaboration advance.

#### Addressing Data Limitations

While the emissions inventory forms a solid baseline, limitations persist, notably for Scope 3. These stem from the value chain's complexity, diversity of suppliers and partners, and inconsistent data maturity and methodological alignment. In some cases, activity data was unavailable or lacked consistency. Constraints also include differences in local systems, changing methodologies, and limited historical data, especially after organizational changes.

#### Roadmap for Data Quality Improvement

To address these obstacles, Allwyn developed a roadmap to enhance data quality, coverage, and reliability. This plan emphasizes harmonizing data-collection processes and definitions, providing guidance and training for local data owners, and improving internal controls and validation. For Scope 3, engagement with key suppliers and value-chain partners will be prioritized, initially targeting the most material emission categories.

#### Phased Improvements and Future Progress

As reporting matures, Allwyn aims to reduce reliance on estimates by increasing use of primary, activity-based information, enabled by advanced digital tools and systems. Data quality enhancements will occur in phases, aligned with broader transition planning and governance. Progress will be reviewed annually, with updates and improvements reflected transparently in future disclosures.



### 3. Resource use and circular economy

Aligned with **ESRS E5 – Resource use and circular economy**, this chapter outlines our policies, actions, and performance across Resource inflows reflecting our material environmental impacts.

Sustainability topic	IRO name	IRO classification
Resource inflows	Use of paper for scratchcards, tickets and other promotion materials	IAN

IAN – Impact Actual Negative

### 3.1. Managing resource use across our operations and value chain

Resource use impacts are mainly linked to the use of paper in lottery operations, including scratchcards and betting slips. Conventional paper lotteries have raised environmental concerns due to the natural resources required for paper ticket production.

We aim to implement responsible practices in our operations and throughout our value chain, including using paper harvested responsibly. We are focused on growth in digital, which reduces the share of services that need paper and have high waste production.

Through these actions, we aim to mitigate our material resource-use impacts while supporting a transition towards more circular and resource-efficient lottery operations over the medium to long-term.

### 3.2. Policies

We are committed to minimising our negative environmental impacts and state this in our **Sustainability policy**, which together with our Environmental, Social and Governance Framework are dedicated to decreasing our negative impact in the context of resource use.

### 3.3. Actions and resources

All of our markets are undertaking measures to utilise certified, sustainably sourced paper, and the majority have transitioned to **using exclusively Forest Stewardship Council (FSC) certified paper for scratchcards**.

Our long-term goal is to source paper for all lottery tickets and scratchcards from sustainable, certified sources, and reduce paper use and waste. This goal is and will be part of our ongoing operations.

In parallel, we are progressively expanding digital lottery services and alternative distribution channels, where permitted, which reduces reliance on virgin paper and limit waste generation over the lifecycle of our products.

Lottery operators	80–100%	50–80%
Share of paper sustainably sourced (FSC)	Greece, UK, Czech Republic	Austria

### 3. Resource use and circular economy

#### reLosy: Giving Scratchcard Tickets a Second Life Through Upcycling

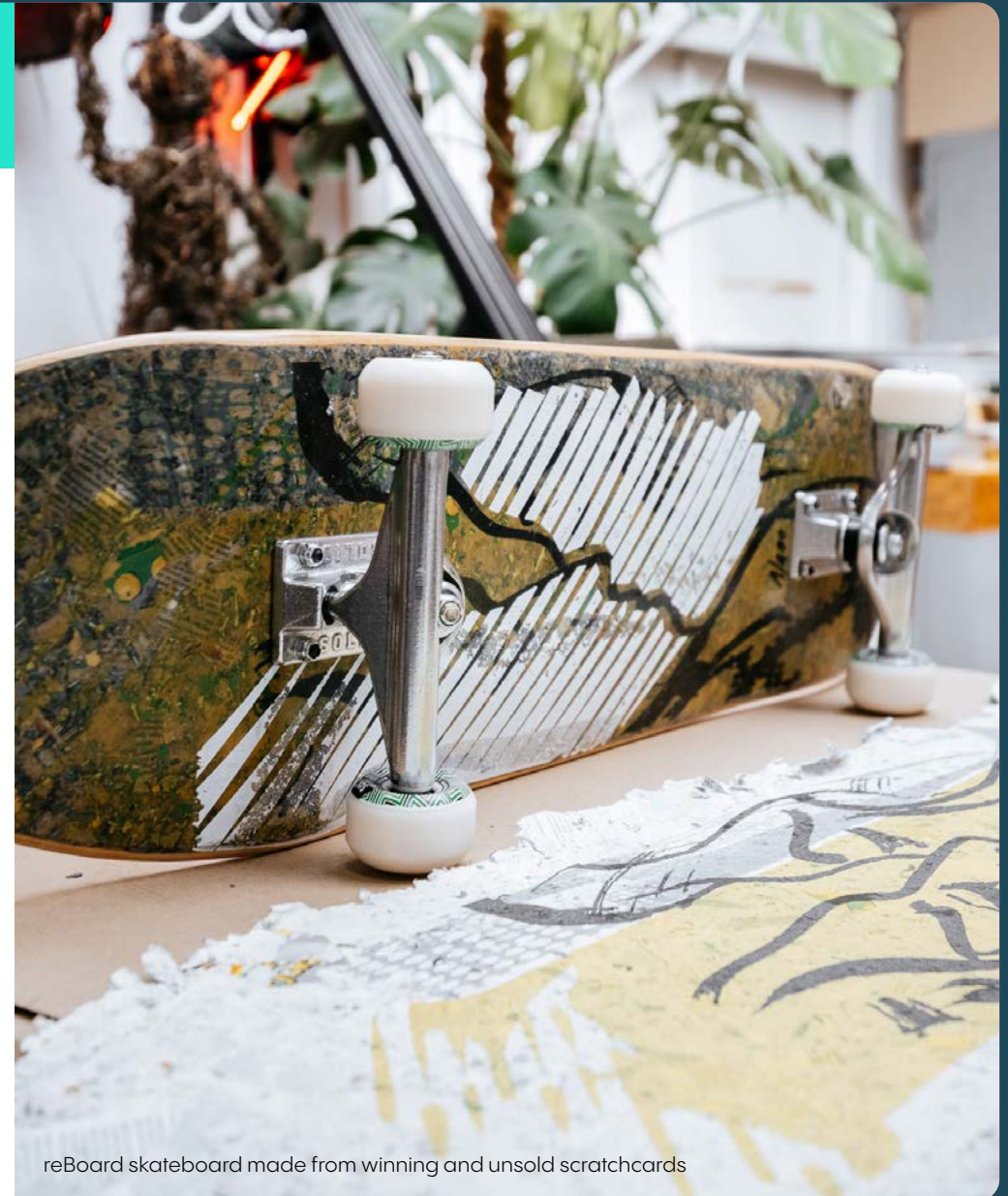
Allwyn Česko (formerly SAZKA) has recycled used scratchcards for more than 20 years. As demand shifted toward larger scratchcard formats, paper consumption increased. At the same time, the company looked beyond long-standing recycling practices for scalable ways to extend the life of unsold and used scratchcards and support circular-economy principles.

We took a two-step approach. First, we reduced scratchcard size, saving more than 30 tonnes of paper year on year. Second, we launched reLosy, an upcycling platform designed to turn scratchcard material into new products and applications. Early pilots included footwear, modular furniture, an air-deodorising product, and a BMX pump track—proof points that helped us test materials, production methods, and end-user demand.

The project has continued to grow with the support of Allwyn, enabling broader capabilities and an international perspective. In the most recent phase, we introduced three new outputs: reBoard (a skateboard made using upcycled scratchcards), a verticalisation cube prototype for people with spinal cord injuries (developed with Centrum Paraple and currently undergoing a clinical study), and durable outdoor furniture installed in a public park in Hodonín – the project was delivered in cooperation with the City of Hodonín, the Karel Komárek Family Foundation, and designer Filip Krámpal, connecting circular design with shared public space.

reLosy has helped raise awareness of upcycling and the circular economy while encouraging experimentation with alternative materials and product design. A key learning is that identifying solutions that are both scalable and economically viable takes time and iteration. Even so, the platform creates tangible value by inspiring customers and partners, opening dialogue on waste reduction, and demonstrating that post-consumer scratchcards can become useful new products.

We consider responsible end-of-life management for our products a baseline expectation. reLosy takes this further by combining waste reduction with innovation—exploring what scratchcard material can become. The initiative also strengthens external engagement by making sustainability more accessible and sparking interest beyond traditional recycling narratives.



reBoard skateboard made from winning and unsold scratchcards

# Social

**S1** Own workforce [▶](#)

**S4** Responsible gaming, consumers and end-users [▶](#)

## 4. Own workforce

Aligned with **ESRS S1 – Own workforce**, this chapter outlines our policies, actions, and performance across four core themes: **Working conditions, Diversity and equal treatment, Training and skills development, and other labour-related rights (Data protection)**. These reflect our material own-workforce-related impacts, risks, and opportunities identified through our double-materiality assessment.

Sustainability topic	IRO name	IRO classification
<b>Working conditions</b>	Workplace defined by fairness, wellbeing, and safe, supportive working conditions	IAP
<b>Diversity and equal treatment</b>	Unbiased, non-discriminatory practices in recruitment, promotion, and employee recognition	IPN
<b>Training and skills development</b>	Employee skills, capability and competency development	IAP
<b>Other labour-related rights – Data protection</b>	Loss of privacy and confidentiality through unauthorised disclosure or access to employee data	IPN

IAP – Impact Actual Positive; IPN – Impact Potential Negative

### 4.1. Making the Allwyn community a place of opportunity for all

By fostering attractive working conditions across our operations and prioritising health and well-being, upskilling, equal treatment, and equal opportunity, we are committed to building an inclusive, diverse, and resilient workplace in which everyone can thrive—at work and in life.

As we continue to grow as a global leader in gaming entertainment, Allwyn’s transformation is enabled by our workforce coming together under one shared set of values and consistent practices. Through the **One Team** element of our strategy, our ambition is to be recognised as a **purpose-driven, high-performing, talent-led** organisation with a culture that **attracts, develops, and empowers exceptional people**.

In 2025, we focused on establishing the foundations for this strategy by developing internal frameworks such as the **Employee Value Proposition** and the **Leadership & Talent Framework**. We prioritised promoting internal career opportunities and standardising employee-engagement insights through the values-led Allwyn Index, which was incorporated into existing local engagement surveys. During 2025, we also set the ground for a new global employee-engagement survey to be rolled out in 2026.

Building on this groundwork, our 2026 priority is to translate these principles into integrated operating practices. A key focus will be strengthening employee communication through enhanced engagement initiatives and close collaboration between Group functions and local entities. We will launch new central platforms to connect, inform, and engage employees across the organisation – including **Global Townhall meetings** and the **Allwyn Strategy Hub**.

The transition of Allwyn Hellas (formerly OPAP) and Allwyn Česko (formerly SAZKA) to the Allwyn brand, completed in January 2026, marked a significant milestone in strengthening a cohesive Allwyn culture and consistent identity across Europe.

#### Our ambition



Create an environment where people feel welcomed, heard and valued



Recruit and retain the best talent



Encourage a culture where every viewpoint is considered



Make a difference in every community we operate in



Help all our people achieve their full potential



Shape inclusive and impactful play, now and in the future

## 4. Our workforce



**Naida Buljugic**  
Chief People & Culture Officer



Our Employee Value Proposition – A Winning Career Awaits – sets out what it means to build a career at Allwyn, reflecting who we are today and where we are headed as we unite behind one culture while growing into a global leader in lottery led entertainment. It defines the core expectations we set for the employee experience across all our markets and provides a Group-wide reference point for how we shape our people policies, programmes, and practices.

At each of our sites around the world, we are building an employee experience grounded in energy, optimism, and responsibility—one that is fair for everyone and provides equal opportunity to thrive, feel respected, and be well supported.

This includes ensuring that our working environment, development pathways, and people related processes are aligned with our commitment to equal treatment, transparency, and consistent standards across the Group.”

## 4. Our workforce

### 4.2. Policies

Allwyn maintains a set of policies and frameworks that safeguard the rights, wellbeing, and fair treatment of its workforce. Local policies may be adapted to comply with national requirements, provided they meet Group-level minimum standards.

Employees are required to complete mandatory onboarding training and annual policy acknowledgement. Policies are accessible on the Group intranet, and the Code of Conduct is available on our corporate website accessible here [Code of Conduct](#).

#### 4.2.1. Code of Conduct

Allwyn's own-workforce-related policies are anchored in the Group [Code of Conduct](#), which sets minimum Group-wide requirements for ethical behaviour, labour-rights protection, and responsible business conduct.

The Code explicitly **prohibits child labour, forced or trafficked labour, and modern slavery**, and sets expectations for respectful treatment of all workers. It also establishes standards for ethical conduct, confidentiality, human-rights protection, fair treatment, data protection, and responsible handling of personal information.

Our commitment aligns with international standards on human rights, including **Global Compact, UN Guiding Principles on Business and Human Rights, Children's Rights and Business Principles, and the ILO Declaration on Fundamental Principles and Rights at work**.

The Board endorses the Code and policy framework. The latest review (December 2025) resulted in no major changes. Business-unit leadership is accountable for compliance and implementation of global standards.

#### 4.2.2. Working conditions & wellbeing

Allwyn's labour and employment policies ensure **fair wages, reasonable working hours, stable employment terms, and robust occupational health and safety practices**.

Allwyn's labour and employment policies are designed to comply with applicable local laws and employment legislation, including requirements relating to wages, working hours, employment conditions, and occupational health and safety. Attention is paid to higher risk roles, supported by risk assessments, safety training, emergency preparedness, and legally mandated preventive measures.

#### 4.2.3. Diversity and equal treatment

**Global Equal Opportunities Framework** provides Group-wide guidance to address multiple dimensions of diversity – including gender, age, ethnicity, nationality, disability, and sexual orientation – with the objective of ensuring our workforce reflects the communities we serve.

The **Code of Conduct**, and related policies such as **Anti-Bullying & Anti-Harassment Policy**, prohibit discrimination or harassment and require unbiased employment-related processes.

**The Grievance & Disciplinary Policy** outlines procedures for raising concerns. The policy emphasises early, informal resolution, with a formal process available when needed. All matters are handled objectively, promptly, and confidentially. Retaliation against good-faith reporting is strictly prohibited.

#### 4.2.4. Training and skills development

Allwyn does not maintain a single unified training policy; however, all employees have access to development opportunities through blended learning, workshops, mentoring programmes, and regular development reviews.

#### 4.2.5. Other labour-related rights – Data protection

Allwyn is committed to robust protection of personal data. Data Protection Policy and Security Strategy define security principles and governance across the Group, while local data-protection policies ensure responsible handling of employee data. Employees complete mandatory data-privacy training and follow established security protocols in all markets.

## 4.3. Engagement with own workforce

Allwyn is committed to maintaining an open and safe working environment where employees can freely express their views. We have clear procedures supporting open communication, grievance handling, and escalation of potential breaches.

The **ANNA** (Allwyn Networking, News, and Administration) intranet serves as a central platform for daily updates, resources, and collaboration opportunities across the Group.

To promote a consistent approach to engagement, all markets adopted the **Allwyn Index** within local surveys, ensuring feedback is assessed against common values and fostering a unified organisational culture. A new global employee-engagement survey is scheduled for launch in 2026, while maintaining the local flexibility for any ad hoc, topic-based or pulse surveys.

All employees have equal access to surveys and feedback mechanisms. We have grievance procedures for employment-related issues and our whistleblowing system – including the Allwyn **Whistleblowing Service** – enables anonymous reporting of unlawful or inappropriate behaviour (for more detail see G1). In Austria, Cyprus, and Greece, regular meetings between employee representatives and management take place under collective agreements.

## 4. Our workforce

### 4.4. Actions and resources

#### 4.4.1. Working conditions & wellbeing

Our **Employee Value Proposition (EVP) – A Winning Career Awaits** reflects our ambition to create a fulfilling, fair, and values-driven employee experience. It is anchored in three pillars:



**Together with purpose**

uniting behind a shared mission and values



**Together we grow**

supporting individual ambition through meaningful opportunities



**Together we thrive**

creating a workplace where people feel heard, valued, and empowered

Allwyn aims to offer stable and secure employment, with **the majority of employees on permanent contracts**. We also aim to provide opportunities for redeployment or retraining during transition periods to minimise redundancies, while offering flexible arrangements in line with equal opportunities.

The Group monitors indicators such as compensation, turnover, workload, wellbeing, and social dialogue outcomes to ensure fairness and competitiveness.

As of 31 December 2025, Allwyn employed 8,041 people (headcount) across the Group. During the reporting period 1,478 employees left Allwyn voluntarily or through dismissal or retirement. **Our turnover rate was 16%**, reflecting a stable workforce and continued efforts to maintain an engaging and supportive work environment.

#### Number of employees (headcount) by gender



Male	4,808	2024: 4,966
Female	3,231	2024: 3,146
Other	2	2024: 3

Male

**60%**

4,808

Female

**40%**

3,231

Other

**>0.1%**

Total number of employees

**8,041**

Allwyn's workforce is geographically diverse. The largest employee populations are in Austria (2,780), Greece (2,289), and the United Kingdom (1,618). Other sizable teams operate in the Czech Republic, Germany, Belgium, while smaller teams work in Ireland, Denmark, Hungary, Liechtenstein, Switzerland, Cyprus, and the United States.

Number of employees (headcount) in the ten largest countries	2025	2024
Austria	2,780	2,778
Belgium	279	280
Cyprus	43	40
Czech Republic	660	612
Denmark	33	32
Germany	N/A*	442
Greece	2,289	2,101
Hungary	107	108
Ireland	4	4
Liechtenstein	86	84
Switzerland	30**	68
United Kingdom	1,618	1,453
United States	112	113
<b>Total of employees</b>	<b>8,041</b>	<b>8,115</b>

\* In 2025 certain operations in the Casino International segment were disposed

\*\* Restated following methodology adjustment\*

## 4. Our workforce

### Winning as ONE: Coming Together in London

Allwyn Summit is our annual opportunity to bring leaders from across the Group together to **connect, share perspectives, and celebrate our collective progress**. This year's Summit in London marked an important moment, bringing our global leadership community together around a **shared purpose and a common ambition: winning as ONE**.

Across three dynamic days, the Summit showcased how collaboration across markets, functions, and cultures is shaping Allwyn's journey. The strategy sessions featured contributions from teams across the Group, with markets presenting their latest products, campaigns, and innovations. The message was clear: **the opportunity ahead is significant – driven by scale, innovation, technology, and a strong focus on customer experience**.

As we look to the future, our vision is to become the leading global gaming entertainment company—lottery led and recognised for our commitment to social responsibility. Achieving this ambition requires **alignment as one team, supported by shared technology, a strong core brand** that respects local sensitivities, and a clear focus on **customers at the centre of what we do**.

A highlight of this year's programme was a fireside chat with our founder, Karel Komárek, in conversation with Naida Buljugic, Allwyn and KKCG Chief People & Culture Officer. The discussion brought to life the thinking behind Winning as ONE, reinforcing the values, leadership principles, and long-term vision guiding Allwyn's next chapter.

Beyond strategy, the Summit offered opportunities for connection and team-building across London, including visits to locations supported by National Lottery funding. Inspiring cultural institutions such as **the National Portrait Gallery, the Wallace Collection, the Royal National Theatre, and BFI Southbank** provided a powerful backdrop to our discussions, reflecting the **positive societal impact enabled through lottery funding**. Participants also enjoyed an exclusive visit to the McLaren Technology Centre, highlighting excellence, innovation, and performance at the highest level.

The Summit concluded with renewed energy, strengthened relationships, and a shared commitment to delivering our strategy over the next five years.



Alexis Zamboglou, Chief Strategy & Transformation Officer, Allwyn Summit, London, UK

## 4. Our workforce

### 4.4. Actions and resources continued

**All employees across all markets are entitled to family-related leave** based on national policies or collective agreements.

**Allwyn respects employees' right to unionise and bargain collectively**, with agreements varying by market. Our employees in Austria are covered by the collective agreement for Austrian Lotteries, for casino operators and for the general industry. Works councils at Casinos Austria AG and Österreichische Lotterien GmbH negotiate mandatory agreements on specific issues with company representatives and management. In Greece, employees are covered by the Greek National Collective Bargaining Agreement and in Cyprus by the Republic of Cyprus Ministry of Labour and Social Insurance legal framework.

In 2025, 5,017 employees (62%) were covered by collective bargaining agreements. A further 5,108 employees were represented by workers' councils or representatives.

In countries where employees are not covered by collective bargaining, our employees are also paid above the minimum wage and are covered by social protection. This means they are entitled to social benefits provided by the respective country.

Collective bargaining coverage				
Coverage rate	Employees – EEA (for countries with > 50 employees included in the ten largest countries)		Employees – non-EEA	
	Current reporting period	Previous reporting period	Current reporting period	Previous reporting period
0–19%	–	–	–	–
20–39%	–	–	–	–
40–59%	–	–	–	–
60–79%	–	–	–	–
80–100%	Austria, Cyprus, Greece	Austria, Cyprus, Greece	–	–

We maintained a record of zero fatalities across our operations. Workplace accidents remained low relative to approximately 15 million hours worked during the reporting period and were mainly confined to retail and casino operations.

Health and safety	2025	2024
Percentage of own employees who are covered by health and safety management system based on legal requirements and/or recognised standards and guidelines	100%	100%
Number of fatalities from recordable work-related accidents	0	0
Number of fatalities from recordable work-related ill health	0	0
Number of recordable work-related accidents	37	23
Rate of recordable work-related accidents	2.4	2

**62%**

of all employees covered by Collective bargaining

**0**

number of fatalities from recordable work-related accidents and ill health

**100%**

covered by health and safety management system

**100%**

employees covered by social protection

## 4. Our workforce

### 4.4. Actions and resources continued

#### 4.4.2. Diversity and equal treatment

Allwyn fosters an environment of inclusive leadership and actively works to minimise bias throughout the employment lifecycle. The company advances diversity, equity and inclusion across all markets by implementing targeted tools and initiatives. Employees participate in unconscious bias training and attend workshops focused on inclusion, trust and constructive feedback.

In 2025, there were **no confirmed human rights incidents** connected to our own workforce, and **no fines, penalties, or compensation were recognised** in the financial statements.

During the year, we launched the Group-wide **Equal Opportunities Strategy Framework** to unify DEI efforts while enabling local flexibility to tailor actions according to their unique cultural contexts and current needs. It is built around four pillars:

#### 1. Increase visibility

Increase awareness of people's needs and the benefits of meeting them: improved performance and team cohesion

Demonstrate how diverse perspectives improve people and commercial outcomes

#### 2. Grow engagement

Identify and mobilise champions in Group-wide networks

Fostering a culture where everyone feels valued and actively included

#### 3. Build robust systems

Prevent bias in our approach to policy and process design – establishing strong foundations and consistency across the Group

#### 4. Pioneer learning

Used shared forums to transmit learnings across the Group

Move the agenda forward with market level pilots to test new ideas and solutions

#### 4.4.3. Training and skills development

Allwyn offers a wide range of learning opportunities, including online platforms, workshops, and mentoring programmes. New learning initiatives are introduced regularly, with a growing focus on accessible, AI-enabled learning that supports continuous professional and personal development.

Training and skills	2025	2024
Percentage of employees participated in formalised performance and career development reviews	73%	69%
Average number of training hours	16	15

#### 4.4.4. Other labour-related rights – Data protection

Allwyn assesses compliance with data-protection requirements by tracking training completion, reviewing controls, and addressing any reported incidents. Policies emphasise confidentiality, accurate processing, and prevention of data misuse. (See G1.)

€0

fines for human rights incidents

0

confirmed human rights incidents

5,814

employees participated in career review

\* active employees only

124,231

training hours

\* active employees only

From 2026 onward, the strategy will expand local projects globally through its core pillars, working closely with group-level workstreams as part of the One Team element of our strategy.

## 4. Our workforce

### Best Place to Work



Allwyn Lottery Solutions at Devoxx Greece

Across the Allwyn Group, our commitment to a positive workplace is consistently recognised.

**Allwyn Hellas** (formerly OPAP) was named a **Top Employer in Greece for the fourth consecutive year** by Top Employers Institute and also received an award for internal communication excellence.

**Allwyn Lottery Solutions** earned **Great Place to Work** certification in **Greece and the UK**, with additional recognition in **Greece** among the **Best Workplaces in Tech and for Women**.

Allwyn North America was certified as a Great Place to Work, recognised by Built In, and ranked 12th in the 2025 Best Workplaces in Illinois.

**Allwyn Cesko** (formerly SAZKA) further strengthened this track record by winning the **Employer of the Year** award for the second consecutive year at the **Pluxee Awards** in the category for companies up to 5,000 employees.

### Make a Difference Month



Volunteering at Centrum Paraple, Czech Republic

In May 2025, Allwyn launched its first **Make a Difference Month**, inviting colleagues across the Group to “do something good, however big or small.” The response was inspiring. Across Austria, the Czech Republic, Greece, the UK, and the US, **247 employees** volunteered their time, energy, and skills to support communities in need.

Activities ranged from helping at food banks and kindergartens to supporting refugee centres and community gardens, directly benefiting more than **880 people** and creating a wider positive impact.

Make a Difference Month highlights Allwyn’s commitment to social responsibility and brings its values to life through collective action and community engagement.

### Driven by Community Impact Award



Winners of the Driven by Community Impact Award

At Allwyn, the **Driven by Community Impact Award** celebrates colleagues who went beyond their core roles to make a meaningful difference, both within the business and in their communities. Following a strong pool of nominations, a global judging panel selected winners from across markets, **recognising contributions in areas such as inclusion, education, wellbeing and sustainability**. Their stories were shared internally to inspire others and bring our values to life.

Their reward was more than a prize, but a shared journey bringing colleagues together through a multi-day programme filled with memorable moments and exchange of experiences. For many, it created an **opportunity to connect with colleagues from Austria, Greece, the Czech Republic and beyond, and to gain new perspectives on how volunteering is embraced across cultures**. As one winner reflected, the experience fostered not only inter-company connection, but connection across cultures.

## 5. Responsible gaming

Aligned with **ESRS S4 – Consumers and End-users**, this chapter outlines our policies, actions, and performance across two core themes: **Personal safety of end-users and Information-related impacts for users**. These reflect our material **Responsible gaming**-related impacts, risks, and opportunities identified through our double-materiality assessment.

Sustainability topic	IRO name	IRO classification
Personal safety of end-users	Preventing harm to players and underage participation	IPN
Information-related impacts for users	Protecting data privacy	IPN
Personal safety of end-users	Potential risk of not meeting responsible gaming practices	R

IPN – Impact Potential Negative, R – Risk

### 5.1. Leading in player safety

Responsible gaming is fundamental to the Allwyn brand and underpins the trust vested in us by players, regulators, and society. Across all operations, we are dedicated to safeguarding players, preventing harm, and protecting minors by fostering safe play, responsible product development, and transparent communication in every market.

As Allwyn expands its global presence, our one brand initiative integrates shared values, uniform standards, and responsible practices that inform how our products are presented and promoted. This approach guarantees that responsible gaming principles are applied uniformly, irrespective of channel or location, while adhering to relevant regulatory requirements.

In 2025, efforts were concentrated on fortifying this framework by elevating responsible advertising and marketing standards, deepening collaboration with regulators, and embedding player protection within product and promotional decision-making.

All markets with lottery operations within the group hold **WLA Level 4 certification** (Greece only in Greece and Cyprus) or have achieved **WLA Responsible Gaming Standards for Associate Members**, the highest level of responsible gaming accreditation awarded by the World Lottery Association, demonstrating comprehensive integration of responsible gaming across governance, operations, and organisational culture. Furthermore, certification to the **WLA Security Control Standard** affirms that our lottery systems, data, and operational procedures are robustly protected against evolving security threats.

For 2026, our priority is to further embed responsible gaming into daily operations under the one brand initiative, enhancing alignment between Group and local teams to ensure consistent player protection, improved communications, and a unified culture of responsibility throughout the organisation.

### 5.2. Policies

#### 5.2.1. Personal safety of end-users

##### Code of Conduct

Our commitment to creating a safe and responsible gaming environment is anchored in the Group Code of Conduct with a focus on:

- **Utilising Technology:** We leverage technology to identify and mitigate problem gaming behaviours, continually improving our processes and practices.
- **Preventing Underage Gaming:** We continuously enhance our methods to prevent underage gaming, adhering to the standards set by the World Lotteries Association and European Lotteries, as well as all applicable laws. This approach is further strengthened through technological means.
- **Responsible Advertising:** We ensure that all our advertising maintains responsible gaming considerations and complies with ethical standards and applicable laws.
- **Product Design Considerations:** We integrate responsible gaming considerations into our product designs to minimise the risk of problem gambling.

## 5. Responsible gaming



**Tatiana Jouanneau**  
Global Chief Brand Officer



At Allwyn, trust is the foundation of our relationship with players and a defining part of our brand. We believe that play should always be enjoyable, fair, and safe, and that protecting players is not just a responsibility, but a promise we make every day across our markets.

Responsible gaming is therefore embedded into the design of our products, the way we communicate with players, and the experiences we create across digital and retail channels. We focus on empowering players with clear information, accessible tools, and supportive messaging that encourages informed and balanced play, while reflecting local cultural expectations and regulatory frameworks.

By consistently putting player safety and wellbeing at the centre of our brand, we aim to build trust, strengthen customer loyalty, and reinforce Allwyn's reputation as a responsible and reliable partner to players and communities."

## 5. Responsible gaming

### 5.2. Policies continued

#### Responsible gaming policy

Our Group Responsible Gaming Policy sets forth explicit commitments to protect the interests of players and vulnerable groups by actively **preventing both underage participation and excessive play**. It underscores the necessity of establishing fair rules and procedures for every game while enforcing robust measures to mitigate underage and excessive gaming.

Furthermore, the policy is dedicated to ensuring that participants **receive accurate and balanced information, empowering them to make well-informed decisions** regarding their gaming activities. It specifies the provision of **responsible gaming tools** – such as time and deposit limits – and outlines the steps taken to inform players about available treatment and support resources.

The policy is consistent with the standards set by both the **World Lottery Association Responsible Gaming Framework and the European Lotteries Responsible Gaming Standard**.

In addition, each of our markets is expected to have its own policies and procedures in place, aligned with both local laws and our Group policies.

Responsible gaming is emphasized throughout operations, led by the Chief Brand Officer, who, together with the Head of Responsible Gaming, are accountable for policy compliance.

#### Marketing Codex

Advertising and marketing also form part of our Responsible gaming policy and a further Marketing Codex is now in place across the Group relating to the approval of content in markets and at HQ. These outline **standards relating to underage appeal and the avoidance of encouragement of excessive play**. This is in addition to local policies relating to responsible marketing, in line with the regulations in each jurisdiction. Product advertising and marketing also indicates where to find further resources and information on responsible gaming, such as signposting to the local responsible gaming page or the national helpline in that market. Legal requirements, such as minimum age to play, are also featured on all materials.

### 5.2.2. Information-related impacts for users

Data privacy and security are governed by the Group Code of Conduct. In addition, markets have adopted their own **Data Protection Policies** tailored to their own regulatory environment while aligned with Group-wide principles and standards. These local policies are designed, to implement the relevant processes under applicable data protection laws for the protection of players' personal data, including, e secure storage and deletion practices, limiting data collection to what is necessary, and so on. They aim to mitigate risks related to privacy breaches and non-compliance, by clearly outlining how personal data is collected, used, shared with third parties, and the rights available to data subjects. This framework ensures compliance with applicable local data protection laws and ePrivacy laws, including **EU GDPR**. Some of our companies have also adopted the Artificial Intelligence Code of Conduct, which sets out the governance, compliance and oversight requirements to be followed for the adoption of new AI systems/applications and compliance monitoring.

The local Data Protection Leads in each market hold ultimate accountability for monitoring compliance with their respective data protection policies, with oversight of the **Group Data Protection Officer**.

## 5.3. Actions and resources

### 5.3.1. Personal safety of end-users

Our **Responsible gaming strategy** prioritises player safety through innovative technology, player education, and the best global practices. Responsible gaming principles are embedded throughout the product lifecycle, from game design and marketing to ongoing operations.

We invest in tools to **detect and prevent harm, offer self-exclusion schemes, and share industry standards across the organisation**. By achieving certifications from European Lotteries and the World Lotteries Association, we commit to ongoing improvement, holding monthly meetings to discuss regulations and develop new initiatives for player protection.

Games operate under strict regulatory frameworks covering impact tests, advertising standards, draw procedures, age and stake limits, and result publication. All operations are subject to oversight by gambling authorities.

# 93%

employees completing responsible gaming training

# € 4.4 million

voluntary funding for gambling harm research, prevention and treatment

## 5. Responsible gaming

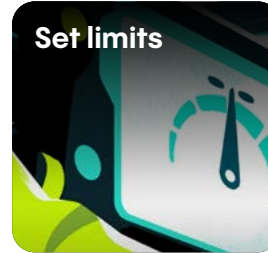
### 5.3. Actions and resources continued

#### A trusted toolbox for player protection

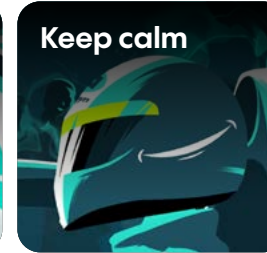
We set the standard for player protection. That's why we've built a simple, effective toolbox of safety principles – designed to help everyone play responsibly, mindfully, and with greater awareness.



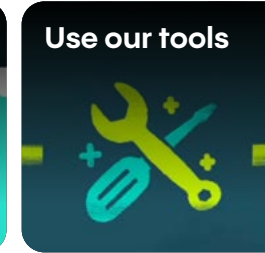
#### Set limits



#### Keep calm



#### Use our tools



#### Have the right mindset



#### Prevention

**Product design** incorporates preventive tools such as **time-outs, deposit limits and self-exclusion**, where legally or operationally permitted. Game design and marketing exclude visual, audio, verbal or written elements that could appeal to minors, helping to prevent underage participation and excessive play.

**Youth protection** is a core focus. All age limits set by law are applied strictly across retail, online and land-based environments. We apply a robust, **multi-layered age verification framework across digital and retail channels** to prevent underage gambling. This combines mandatory **identity checks, automated verification technologies, real-time account controls and strict retail age-check procedures**. Controls are supported by continuous monitoring, staff training and compliance audits to ensure effective enforcement and regulatory compliance across all markets.

Product risk assessments are conducted prior to launch using tools such as **ASTERIG and GamGard** to assess product safety, design features and potential appeal to underage audiences or excessive play.

**Advertising** is also subject to **controls to mitigate exposure to vulnerable or underage groups**, including content review processes, marketing team training and ongoing refinement of targeting tools.



#### Detection

Across all markets, mechanisms are in place to **monitor compliance with age-restriction requirements and responsible gaming standards**. Retail partners are expected to verify the age of customers who appear to be underage 25 years old.

**Advanced technologies**, including data analytics and artificial intelligence, are used to identify potential indicators of harm and non-compliance. Continuous monitoring of gameplay behaviour, feedback and complaints enables **early identification of risks** related to underage play or harmful gaming patterns.

The effectiveness of responsible gaming measures is assessed through regular evaluations and audits, including analysis of the reach and impact of responsible gaming communications and surveys measuring consumer awareness. Independent assurance is provided through the European Lotteries Responsible gaming certification process.



#### Intervention

Where risks or breaches are identified, targeted actions are taken to prevent or mitigate harm. Retailers and employees across retail, online and physical venues receive training to recognise at-risk customers and intervene appropriately. Contracts with retailers promote responsible play and enable enforcement measures where standards are not met.

**Sanctions are applied for violations of age-restriction or responsible gaming requirements**, and retailer contracts may be terminated in cases of serious or repeated non-compliance. Marketing practices are adjusted where necessary, and affected individuals are directed to responsible gaming information and support resources.

The Group continuously **reviews responsible gaming performance metrics**, including indicators related to underage play prevention, employee training and the provision of responsible gaming information. Insights from data analysis and engagement with regulators, consumers and other stakeholders inform the development of targeted interventions and ongoing improvements to the Responsible gaming strategy.

## 5. Responsible gaming

### 5.3. Actions and resources continued

#### 5.3.2. Information-related impacts for users

We maintain confidentiality, accuracy, and lawful use of information through our comprehensive **data protection and information security policies**. All entities have extensive experience and established processes in the field of data protection. They have approaches and processes to prevent data breaches and procedures to follow in the event of accidental or intentional data breaches.

The effectiveness of our data protection management system across the entire group is documented and confirmed through regular internal and external audits. Data protection compliance activities focus on the security of customer and guest data, as well as ensuring compliance with the rights of the data subject.

The Group **data incident response playbook** is designed to assist our business and subsidiaries in efficiently and effectively identifying, analysing, responding to, and resolving actual or suspected data breach incidents. The plan aims to protect the company from financial, legal, privacy, and reputational risks through a systematic and comprehensive data incident response process.

Most of companies within Allwyn, for which it is relevant, have implemented an information **security management system** (ISMS) certified according to the **ISO/IEC 27001** standard, which encompasses all organisational and technical measures for information protection. At the company level, audits are regularly conducted to check user accounts in selected applications and set access rights. Companies have established a system for reporting and resolving security incidents. Access to critical areas is restricted to authorised personnel and is secured by a two-level verification process or a single-level electronic access control method.

### 5.4. Engagement with players in responsible gaming

We **promote player education through the integration of responsible gaming information into customer communications**, including clear signposting to tools, limits and support services via local responsible gaming web pages. These activities are supported by **awareness campaigns, local responsible gaming days, affiliate marketing practices and participation in industry-wide safer gambling initiatives**.

**In retail environments**, responsible gaming information is made available to players before, during and after gameplay. This includes game guides accessible via QR codes at counters, signage at store entrances and within stores, and dedicated information points providing leaflets, self-assessment tools and player safety guidance. Self-Service Betting Terminals (SSBTs) and Video Lottery Terminals (VLTs) provide limit-setting functionality and access to responsible gaming information.

**In digital channels**, responsible gaming information is communicated both indirectly and directly. Indirect communication includes content published on social media platforms and dedicated responsible gaming websites. Direct communication is delivered through user accounts, including pop-ups and targeted messages informed by player risk profiles generated through internal risk detection systems.

Advanced monitoring approaches, including AI-based analysis of customer communications and chat logs, support the identification of potential risks and enable timely interventions, including signposting to appropriate tools and support services.

### 5.5. Responsible gaming compliance risk

For Allwyn, adhering to responsible gaming regulations and fulfilling legislative obligations is a critical compliance risk. These include the potential for legal and regulatory sanctions, significant financial losses, or reputational damage due to non-compliance with laws, rules, regulations, internal policies, instructions, and standard operating procedures.

Our Group responsible gaming department and Compliance department collaborate with the Group Risk management team to establish methods of identification of key compliance and responsible gaming risks standards for managing these risks across the Group. The Group Risk framework delineates the key roles and responsibilities to ensure adherence to applicable laws, regulations, and best practices within all jurisdictions where Allwyn operates.

The Group Risk management is responsible for designing and maintaining the risk management framework. The Group Compliance and Responsible gaming team provides the necessary guidance and standards to support the management and mitigation of these risks, including but not limited to developing policies and procedures, and delivering targeted compliance training to relevant employees.

Group Compliance provides independent oversight, advice, and constructive challenge within the organisation to ensure effective identification and management of compliance risks. Group Compliance independently reports and escalates compliance risks and issues to the Board. We employ a risk-based approach to understand and manage the Group's compliance risks.

**No fines or sanctions were imposed by authorities in 2025 related to responsible gaming, data handling and marketing.**

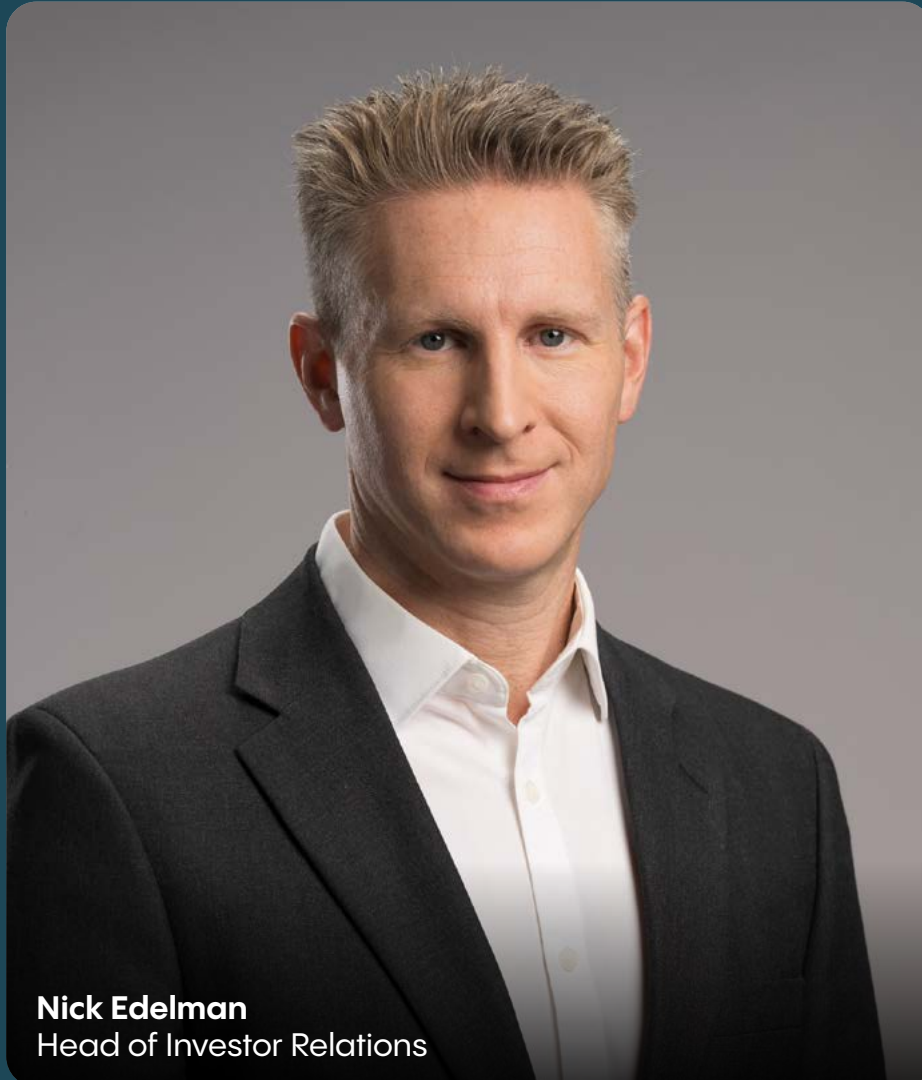
€0

fines related to responsible gaming

0

sanctions related to responsible gaming

## 5. Responsible gaming



**Nick Edelman**  
Head of Investor Relations



For Allwyn, investor expectations around ESG information continue to evolve, with particular focus on the Group's defined material operational and regulatory risk areas, notably responsible gaming and data privacy. Investors are seeking clear and credible explanations of how these risks are governed and managed, with appropriate transparency on processes, controls and oversight.

Expectations for consistency in ESG reporting have also risen, alongside interest in relevant supporting information. Constructive engagement on these topics supports more informed dialogue, enhances comparability across peers, and helps build confidence in the robustness of Allwyn's approach to sustainability, which is reinforced through the Group's values and underpinned by strong risk management practices".

## 5. Responsible gaming

### Participant Protection Conference



The National Lottery's Participant Protection Conference hosted by Allwyn UK

Allwyn UK hosted The National Lottery's first **Participant Protection Conference, Protecting Lottery Participant Interests: Where Next?**, bringing together experts from across the Allwyn Group and external specialist organisations. The conference reflected the long-standing **focus on participant protection and its central role in the responsible growth of The National Lottery**, including the ambition to increase returns to Good Causes over the licence period.

The day-long event explored key issues shaping the future of participant protection, including the use of artificial intelligence in lotteries, lived-experience perspectives, and digital identity solutions to strengthen youth protection.

The conference was opened by Allwyn UK CEO Andria Vidler, who outlined the importance of participant protection to Allwyn and the measures in place to ensure **the National Lottery remains a safe and trusted offering**. Keynote contributions were also provided by Andrew Rhodes, Chief Executive of the Gambling Commission, and Dr Richard Wood, psychologist and gambling behaviour specialist, who delivered a masterclass on the Positive Play Scale.

Insights from the conference will inform the ongoing development of Allwyn's participant protection approach.

### Playsponsible Academy



Playsponsible Academy hosted by Casinos Austria and Austrian Lotteries Group (by Ch.Husar for Casinos Austria)

The **annual Playsponsible Academy** is a cornerstone of knowledge exchange on player protection for the **Casinos Austria and Austrian Lotteries Group**, bringing together international expertise across psychology, psychiatry, social sciences and neuroscience.

The 2025 Academy took place in April at Casino Baden and **focused on the shared responsibility of operators to go beyond regulatory requirements to protect players and prevent gambling-related harm**. Sessions highlighted the importance of **early detection of problematic behaviour, evidence-based prevention, and continuous employee training**.

Clinical psychologist Ute Andorfer from the Anton Proksch Institute underscored the value of involving affected individuals in prevention training and the role of well-trained employees in identifying risks at an early stage. Former Formula 1 driver Alexander Wurz drew parallels between Formula 1 and gambling, emphasising that **responsible risk management depends on highly trained staff and continuously evolving safety systems**.

The Playsponsible Academy also serves as a platform for dialogue between employees, regulators and counselling organisations, supporting continuous improvement in player protection practices.

### Responsible Gaming Conference



Responsible Gaming Conference Hosted by Allwyn Hellas

Allwyn Hellas hosted its **first Responsible Gaming Conference in Athens**, bringing together **government representatives, regulators, international associations and industry stakeholders to promote dialogue on player protection, regulatory supervision and tackling the illegal gambling market**. The conference marked an important milestone in strengthening a safer and more responsible gaming environment through **collaboration between the public and private sectors**.

The event welcomed more than 400 participants and highlighted broad support for new legislative initiatives, while recognising Allwyn's role in advancing Responsible Gaming practices in Greece. Dr. Nancy Verra, Allwyn Hellas Chief Legal, Regulatory & Compliance Officer outlined its Responsible Gaming framework, which includes **the use of data-driven and AI-enabled tools, as well as ongoing training and awareness programmes for employees, partners and society**.

During the conference, the Deputy Minister of Health highlighted Allwyn's contribution to EOPAE, including full funding of the national 1114 helpline supporting individuals affected by excessive gambling behaviour.

# Governance

**G1** Business conduct ▶

**G1** Cyber security ▶

**G1** Social investments ▶

## 6. Business conduct

In accordance with **ESRS G1 – Business Conduct**, this chapter presents our policies, initiatives, and outcomes related to the following key areas: **Corporate culture, Cybersecurity, and Social investments**. The latter two are company-specific focus areas that play an integral role in shaping our business practices. These areas reflect our material business conduct-related impacts, risks, and opportunities, as identified through our double-materiality assessment.

Sustainability topic	IRO name	IRO classification
Corporate culture	Ethical conduct and anti-corruption are core to corporate culture	IPN
Corporate culture	Responsible business conduct supports our role as a reliable partner to governments and regulators	O
Corporate culture	Potential risk of not meeting regulatory and stakeholder expectations for licences, concessions, and social investments	R
Cybersecurity	Potential risk to prevent cyberattacks and loss of sensitive data	R
Social investments	Contributing to the public good through targeted social responsibility initiatives	IAP

IPN – Impact Potential Negative, R – Risk, O – Opportunity, IAP – Impact Actual Positive

### 6.1. Upholding responsible business conduct as the foundation of trust

We aim to position ourselves as the preferred operator for governments, regulators, players, and stakeholders worldwide, creating playful, rewarding, and socially meaningful experiences that connect people everywhere – globally connected, yet deeply rooted in our local communities. This ambition is inseparable from our commitment to responsible and ethical conduct, which forms the backbone of how we do business.

In 2025, we further strengthened the foundation of our approach by enhancing the policies and practices that support our business conduct. Looking ahead, we aim to integrate these principles more deeply into our daily activities by increasing awareness, ensuring consistent behaviour across markets, and improving training and internal communication so that every employee recognises their role in upholding our ethical standards.

Compliance remains a cornerstone within the lottery and gaming industry and is critical for sustaining our licences and concessions.

Our corporate culture is built on ethical behaviour and adherence to legal and regulatory requirements in all interactions with governments, regulators, and partners across jurisdictions.

Data protection and cyber resilience are ongoing priorities. The scale of our operations and the volume of sensitive information we manage expose us to cyber risks that could disrupt business activities, undermine stakeholder trust, and cause financial losses. Continuous investment in robust systems, effective controls, and comprehensive training is essential to safeguard the information entrusted to us.

Beyond regulatory compliance, we are committed to making a positive societal impact. Through sustained collaboration with communities, we strive to ensure our activities benefit not only our organisation and players but also contribute positively to the societies in which we operate.

Together, these efforts form the framework for a unified Allwyn culture built on integrity, transparency, and responsibility, supporting our long-term vision.

## 6. Business conduct



**Jonathan Handyside**  
Group General Counsel



In the lottery and gaming sector, robust governance and effective compliance are fundamental to maintaining our licences to operate and preserving the integrity of our business. At Allwyn, governance provides the framework for identifying, assessing, and managing regulatory, legal, and ethical risks, including those related to licensing requirements, anti-money laundering, responsible gaming, and data protection, and it enables our business to make informed and responsible decisions.

Compliance is embedded within our internal control environment, with clear accountability, defined roles, and consistent standards applied across our markets. These controls support the prevention, detection, and escalation of compliance risks that could otherwise result in regulatory sanctions, financial penalties, or reputational harm.

By integrating governance and compliance into day-to-day operations and decision making, Allwyn safeguards business continuity and asset value, and upholds trust with our regulators, players, and other stakeholders. This disciplined approach supports the sustainability of our licence-based business model in a complex and evolving regulatory landscape.”

## 6. Business conduct

### 6.2. Policies

Allwyn implements a comprehensive set of business conduct policies that establish minimum standards across the Group, and are tailored to local requirements.

Employees receive mandatory onboarding training and, to reinforce ongoing compliance and maintain awareness, must formally acknowledge business-conduct-related policies, including the anti-bribery and corruption policy. All policies are accessible on the Group's intranet, and the Code of Conduct is publicly available on our corporate website.

#### 6.2.1. Corporate culture

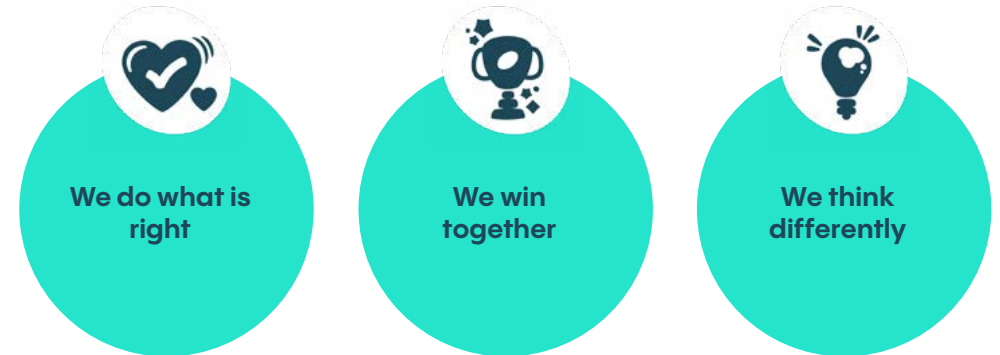
##### Code of Conduct

The Group Code of Conduct sets clear **standards for ethical and responsible behaviour, ensuring integrity, transparency, and accountability in all business activities and interactions**. Compliance with this Code of Conduct is obligatory for all individuals associated with Allwyn, including employees, directors, consultants, suppliers, and contractors.

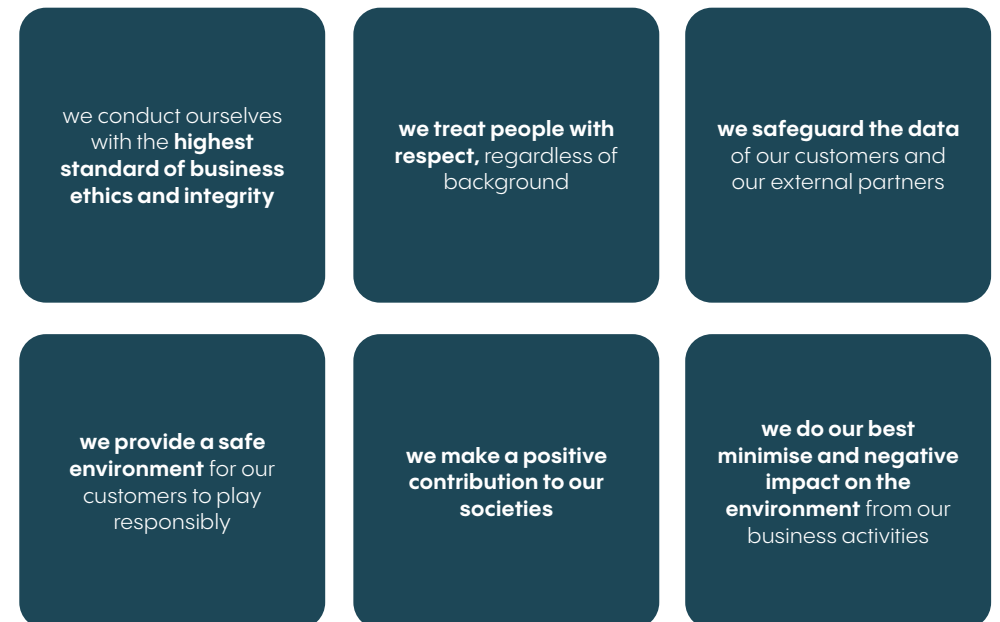
The Code of Conduct covers the following topics:

- Modern slavery and human rights;
- Working with third parties, customers, and suppliers;
- Responsible gaming;
- Gifts and hospitality;
- Conflicts of interest;
- Fraud, bribery and corruption;
- Anti-Money Laundering, counter-terrorist financing and sanctions;
- Competition and antitrust;
- Market abuse regulations and insider dealing;
- Tax evasion;
- Privacy and security;
- Company property;
- Whistleblowing;
- Grievances;
- External communication;
- Confidentiality;
- Non-discrimination; and
- ESG & Sustainability

This Code of Conduct follows our values:



These are reflected in the following pillars



## 6. Business conduct

### 6.2. Policies continued

#### Anti-Bribery & Corruption Policy

Allwyn adopts a zero-risk appetite for bribery and corruption in any form. This means we do not, and will not, offer, pay, request, or accept bribes, facilitation payments, improper incentives, or anything that could be perceived as such in the course of our business activities.

The anti-corruption and anti-bribery framework is **aligned with internationally recognised standards, including the United Nations Convention against Corruption, the UK Bribery Act, the U.S. Foreign Corrupt Practices Act, the Czech Criminal Code (Act No. 40/2009 Coll., as amended), the Austrian Penal Code (Strafgesetzbuch, §§304–308) addressing corruption in public and private sectors, including foreign officials, and the Greek Penal Code (Arts. 235–238, 159, 237A) and Law 5090/2024.**

It is designed to guide behaviour and decisions in a variety of situations that may arise in the course of professional duties. It strictly prohibits giving bribes to anyone; taking bribes from anyone; suggesting, proposing, requesting, offering, brokering, or handling bribes; and using other people to do any of the above. **A clean record in anti-bribery and corruption is usually a prerequisite for entering new markets or forming partnerships. Demonstrable compliance can therefore be a competitive advantage in expanding our business.**

The Company's Board of Directors and senior management are committed to and involved in anti-bribery and corruption efforts and seek to lead from the top by establishing clear governance structures with defined roles and responsibilities for anti-bribery and corruption efforts.

Together, these frameworks guide our zero-tolerance approach to corruption by requiring robust preventive measures, strict internal controls, transparent financial practices, and clear expectations for ethical conduct across all markets.



finest for corruption & bribery



cases recorded for corruption & bribery

#### Gifts, Hospitality and Donations Policy

The aim of the policy is to ensure that the giving or receiving of gifts, hospitality or donations does not influence, or appear to influence, business decisions, and does not create conflicts of interest or risks of bribery or corruption.

#### Anti-Money Laundering & Counter-Terrorist Financing Policy

The policy is designed to prevent Allwyn's operations from being misused for money laundering, terrorist financing or related financial crime, and is **aligned with applicable laws and international standards, including FATF principles**. The policy reflects the heightened risk profile of the gaming and lottery sector, where high transaction volumes and potential anonymity may be exploited for illicit purposes.

Allwyn is committed to maintaining a robust **anti-money laundering (AML) and counter-terrorist financing (CTF) framework** to ensure full compliance with applicable laws and regulations. Our risk appetite for AML and CTF reflects a responsible risk-based approach. Allwyn has no tolerance for deliberate or systemic violations and is committed to stringent controls and measures to safeguard integrity and compliance with applicable laws and regulations.

Below is a non-exhaustive list of principal laws and regulations regarding AML & CTF applicable to Allwyn:

- The United Kingdom Money Laundering and Terrorist Financing (Amendment) Regulations 2019;
- Proceeds of Crime Act 2022 (United Kingdom);
- The EU Anti-Money Laundering Directives and Regulations;
- The Swiss Anti-Money Laundering Act (AMLA);
- The Austrian AML legal framework, including applicable provisions of the Austrian Financial Markets Anti-Money Laundering Act (FM-GwG), sector-specific gambling legislation, and relevant criminal law provisions;
- The Czech Act No. 253/2008 Coll. on selected measures against legitimisation of Proceeds of Crime and Terrorist Financing, as amended;
- The Greek AML legal framework, including Law 4557/2018, as amended; and
- The United States Bank Secrecy Act of 1970 and implementing regulations, where applicable.

## 6. Business conduct

### 6.2. Policies continued

#### Fraud Prevention Policy

The purpose of this Policy is to establish minimum Group-wide standards for the prevention of fraud, support Group Companies in complying with applicable fraud-related laws, particularly those in the UK, Switzerland and relevant EU jurisdictions, embed a culture of integrity and accountability across all Allwyn entities, and demonstrate that reasonable procedures are in place to prevent fraud

#### Whistleblowing Policy

The policy forms part of the company's **grievance-mechanism framework** for our own workforce, other individuals in a work-related relationship and external third-parties. The policy specifies channels for reporting suspected or actual misconduct, including illegal activities, breaches of internal policies, and other serious wrongdoing.

Reports can be **submitted through a secure Group Whistleblowing Hotline**, operated via an encrypted, password-protected online tool accessible through the Group intranet and public website [WhistleB](#). Reports may be made confidentially and anonymously and in any language.

All reports are acknowledged within seven days, assessed and investigated by designated, independent reporting officers – **Whistleblowing Reporting Officers**, with corrective measures implemented where concerns are substantiated.

The policy provides **strict protection against retaliation**, ensures confidentiality of whistleblowers' identities in line with applicable law, and is overseen by the Group Compliance Department, with enhanced governance through reporting to management, the Board and the Audit Committee. Data relating to reports is handled in accordance with applicable data-protection requirements and retained only for defined periods.

Jurisdiction-specific annexes ensure compliance with local whistleblower-protection laws, including additional measures for **EU subsidiaries to meet EU Directive (2019/1937)**.

#### 6.2.2. Cybersecurity

##### Security Charter Policy\*

The policy defines the fundamental principles, protection goals, and governance framework for **information security** across the Group and establishes minimum security requirements, which are further detailed in subordinate internal policies and local procedures.

It specifies Allwyn's **commitment** to lawful conduct and regulatory compliance, protection **of personal and business data** of customers, employees and partners, and the integrity, **fairness and transparency of gaming systems and data**, including lottery draws and gaming transactions. It emphasises the prevention of fraud, manipulation and unauthorised access, while supporting a risk-based, business-enabling approach to security that underpins innovation and stakeholder trust. **Continual improvement and alignment with international standards (e.g., ISO/IEC 27001, WLA-SCS) are integral to this approach.**

Governance and oversight are ensured through defined responsibilities within the Group Technology function, with regular monitoring, reviews and audits of security practices at Group and subsidiary-level. Security performance, incidents and improvements are reported to senior management, the Board and the Group Audit Committee, and the policy is subject to annual review.

\* as of January 2026

#### 6.2.3. Social investments

##### Sustainability policy

The policy establishes the Company's commitment to **giving back to society and the communities in which it operates**. The policy mandates the support of community development through generating returns for Good Causes and implementing Corporate Social Responsibility (CSR) projects and initiatives, which are funded both centrally and by operating subsidiaries. Allwyn is dedicated to fostering **healthy and active communities by facilitating access to sports, arts and culture, and healthcare services**. The policy encourages and enables employee participation in local projects, empowering them to make a positive impact at the grassroots level.

## 6. Business conduct



**Pavel Turek**  
Chief Officer Global Partnerships



After a successful first season together, Formula 1 and Allwyn have agreed to extend their Official Partnership through a new multi-year agreement. This collaboration reflects our ambition to use the global reach of sport to deliver positive outcomes for fans and communities alike.

Formula 1 provides a powerful platform to engage diverse audiences across markets, while ensuring that the excitement on the track is complemented by meaningful experiences off the track, delivering value for fans and a lasting impact for the communities we visit. Community engagement is therefore a central element of this partnership, translating global visibility into meaningful local support.

A key expression of this commitment is the Allwyn Global Community Awards, which will return and expand in the coming season. Following its inaugural year, in which four community organisations were supported across the United States, Mexico and the Netherlands, the programme will now double in scale. The Awards will support community projects connected to up to eight Grands Prix, strengthening local impact and promoting more inclusive communities.”

## 6. Business conduct

### 6.3. Actions and resources

#### 6.3.1. Corporate culture

Allwyn seeks to implement **robust financial and operational controls to prevent and detect corrupt activities**. Where possible, it will make use of data analytics and other advanced tools for continuous monitoring and auditing. The Board of Directors and senior management actively lead anti-bribery and corruption efforts by setting clear governance structures with specific roles and responsibilities.

Allwyn **communicates its business conduct policies** to stakeholders via multiple channels, such as the Code of Conduct, training sessions, contractual clauses, public communications, and the intranet. Training content is routinely revised to address evolving risks and legal requirements. Documentation of all training and awareness activities is systematically maintained.

Allwyn conducts **regular risk assessments** to identify and address business conduct, including bribery and corruption and AML/CTF risks across its operations, including geographic, sector-specific, and transactional risks, focusing resources and controls proportionately on areas of higher risk. This includes assessing the nature of counterparties, transactions, jurisdictions, and business activities to identify potential exposures. **Risk-based due diligence** is mandatory before engaging third parties, considering bribery, corruption, money laundering, and terrorist financing risks.

To maintain transparency in accounting and bookkeeping, **comprehensive records** of all due diligence procedures, financial transactions, and risk assessments are retained.

The Group performs periodic independent audits of anti-bribery and corruption controls, incorporating routine reviews and updates to relevant policies and procedures in response to audit findings and evolving legal and regulatory requirements.

**Employees are encouraged to report violations** to the Compliance function or anonymously via the Whistleblowing Policy. Allwyn has procedures to investigate allegations, ensuring investigators are independent from involved parties. Employees who report breaches are protected from retaliation or discrimination.

Our business is subject to the Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour. Based on the Group's assessment, it does not import to, or process in Switzerland minerals and metals containing tin, tantalum, tungsten or gold (so-called 3TG) originating from conflict affected or high-risk areas such as war zones or areas with widespread systematic violations of international law. We also concluded that we do not offer products and services in relation to which there is a reasonable suspicion that they have been produced or provided using child labour.

**During the reporting period, there were no convictions or sanctions recorded, nor were any fines imposed for violations of anti-corruption and anti-bribery laws.**

#### 6.3.2. Cybersecurity

Allwyn maintains a globally coordinated information security framework aligned with internationally recognised standards, including **ISO27001, ISO27018, and the World Lottery Association Security Control Standard (WLA-SCS)**. For operations involving payment processing, additional controls are implemented in accordance with **PCI-DSS requirements**.

These frameworks ensure consistent security governance across all operating entities and support the protection of customer data, the integrity of gaming systems, and compliance with regulatory expectations.

All relevant entities maintain up-to-date certifications, which are subject to regular independent audits. **There were no material cybersecurity incidents in 2025.**

#### Stronger protection against online attacks

In 2025, we expanded protection for all customer facing systems, improving resilience against large scale traffic attacks, automated bot activity, and account takeover attempts. Several operating companies upgraded their infrastructure protection after internal testing revealed risks in previously unprotected systems. As a result, the Group now operates with significantly higher stability and readiness.

#### Proactive vulnerability management & bug bounty success

Our vulnerability disclosure and bug bounty programme continued to deliver strong results, with more than a hundred vulnerabilities remediated and a growing community of ethical hackers helping us strengthen our defences.

#### Enhanced threat detection & 24/7 monitoring

We made substantial progress toward a unified, round the clock threat monitoring and response capability. Several entities fully onboarded into managed detection and response, gaining faster incident investigation, reduced false positives, and improved visibility across on premise and cloud environments. Others plans modern replacements for older monitoring solutions in 2026.

#### Improved threat intelligence & brand protection

Group-wide leaked credential monitoring helped detect and prevent misuse of compromised passwords. Multi-factor authentication is required for all critical internet facing systems.

#### Greater external risk visibility

We deployed a new attack surface management capability across the Group, giving security teams continuous visibility of exposed assets, misconfigurations, and vulnerabilities. This significantly improved our ability to detect and remediate risks early.

#### Certifications & compliance

All entities successfully passed their scheduled security audits, with key operations completing their 2025 recertification activities under international security standards.

## 6. Business conduct

### Protecting customer online accounts through proactive cyber risk management

Protecting customer online accounts is essential to maintaining trust, service continuity, and regulatory compliance. Allwyn operates a broad and evolving digital footprint that must be continuously protected against external cyber threats.

Alongside existing controls like centralised vulnerability management and regular penetration testing, Allwyn strengthened its security posture in 2025 by introducing **External Attack Surface Management (ASM)**. This builds on the managed Bug Bounty programme launched in 2024, which was further expanded and improved in 2025.

**Attack Surface Management** provides continuous visibility into Allwyn's internet facing assets. In practice, ASM has identified previously unknown or unintentionally exposed systems, including misconfigured services, outdated software components, and externally accessible management interfaces. These findings enabled remediation before exploitation and improved oversight of assets across subsidiaries and cloud environments.

The **Bug Bounty programme** engages vetted ethical hackers to test customer facing applications under real world conditions. Ethical hackers have identified security weaknesses that are difficult to detect through automated scanning alone, such as access control issues, credential exposure, and business logic vulnerabilities affecting authenticated user flows. All reports are validated, risk rated, and remediated through established governance processes.

Together, these controls strengthen Allwyn's ability to prevent customer account compromise, safeguard personal data, and proactively reduce cyber risk. They also highlight Allwyn's commitment to responsible digital operations, helping maintain customer trust and long-term resilience.



## 6. Business conduct

### 6.3. Actions and resources continued

#### 6.3.3. Social investments

Responsibility and social impact remain at the core of our business model, underpinning how we build trust with players, regulators, partners, and communities.

Our vision is clear: to enhance community wellbeing, inclusion, and opportunity by embedding fairness, fun, and measurable social impact into our global and local initiatives. This vision is aligned with the **UN Sustainable Development Goals (SDG)**, especially **SDG 3 (Health)**, **SDG 4 (Education)**, **SDG 10/11 (Inclusive Communities)**, and **SDG 17 (Partnerships)**.

Across our markets, Allwyn supports global partnerships and locally led programmes across health, education, inclusion, sport, and culture. Key global initiatives – such as the **F1 Allwyn Global Community Award**, **Wings for Life World Run**, and **More Than Equal** – sit alongside strong **local programmes like supporting educational, sports and mental health activities**.

In 2025, we focused on enhancing the coherence between global and local initiatives, aligning CSR pillars with social goals, defining outcomes in local markets, and building a unified impact inventory and tracking system.

In 2025, we supported a total of **196 initiatives** across our markets, with a total amount of **€16.4 million**. In most cases, we have established long-term partnerships to ensure that the projects we support can achieve lasting and sustainable impact. The supported activities aim to bring positive changes to the communities where we operate. These initiatives encompass

a wide range of activities, from **educational programmes and social projects to environmental initiatives and community sports programmes**.

Employees receive at least two fully paid volunteer days per year. They can join activities organised by the Group or volunteer with a charity of their choice.

Our expertise in improving lotteries by developing innovative lottery products, expanding the player base, and optimising the player experience across both retail and digital platforms contributes to **increasing returns for governments and charities** and demonstrates our commitment to innovation and global best practices. These achievements help us secure and maintain the necessary licences to operate our lottery and gaming business, positioning us strongly for future growth.

In 2025, taxes, duties and mandatory contributions to Good Causes increased by €515.9 million, or 12%, to €4.8 billion, including **€2 billion of Good Cause contributions generated by The National Lottery in the United Kingdom**. These contributions to public funds are crucial for financing various charitable and social projects aimed at improving the quality of life in the communities where we operate.

**€16.4**  
million  
donated

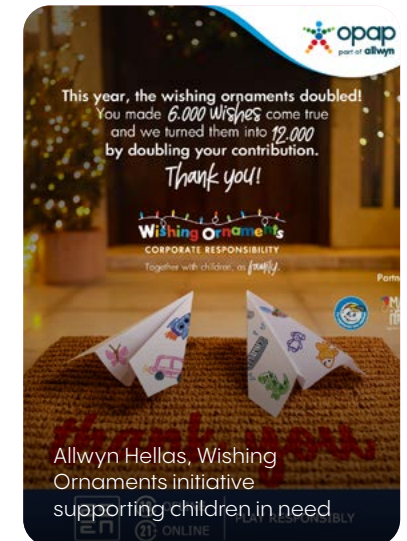
**196**  
initiatives supported



Allwyn North America partnering with Nourishing Hope to pack home-delivery orders



Allwyn UK sponsoring the Official Volunteer Programme at the Women's Rugby World Cup 2025 (by Getty/World Rugby)



Allwyn Hellas, Wishing Ornaments initiative supporting children in need

## 6. Business conduct

### F1® Allwyn Global Community Award - making a difference beyond the race track

The **F1® Allwyn Global Community Award**, led by Allwyn in partnership with Formula One, represents the Company's flagship global CSR initiative. It leverages the global reach of Formula 1® to promote high-impact non-profit projects, supporting positive societal outcomes aligned with Allwyn's sustainability priorities.

The programme focuses on four key impact areas – Empowerment & Inclusion, Education & Opportunity, Health & Wellbeing, and Sustainability & Innovation – and provides selected organisations with €100,000 award, alongside global visibility and capacity-building support. This approach enables locally driven initiatives to scale their reach and enhance their long-term impact.

In 2025, the programme supported **four organisations across Europe and North America**, allocating **€400,000 in total**. These initiatives reached more than **27,000 direct beneficiaries** and **engaged over 400,000 people globally** through awareness and inclusion activities. Reported outcomes included improved educational attainment, increased participation of underrepresented groups, and enhanced wellbeing in target communities, contributing to the advancement of relevant UN Sustainable Development Goals.

Reported outcomes demonstrated measurable impact across education, inclusion, and wellbeing. For example, Fundación John Langdon Down (Mexico) provided care and education to 89 children with Down syndrome and 445 family members, with 80% of children showing developmental progress. In the Netherlands, Stichting HandicapNL enabled accessible events for 1,000+ people with disabilities and reached over 400,000 through inclusion campaigns.

Overall, the **F1® Allwyn Global Community Award demonstrates how strategic partnerships and robust impact measurement can drive scalable and meaningful change** – bringing Allwyn's purpose of making a positive difference to life.



F1® Allwyn Global Community Award presented to Austin STEM for girls initiative Girlstart

# Additional information

## EU Taxonomy

The EU Taxonomy provides a unified way to classify which economic activities are considered environmentally sustainable, based on technical criteria. Our company chose to conduct this assessment voluntarily under the EU Taxonomy Regulation and updated our approach in line with recent simplification measures.

Our main business – Operating Lotteries and Betting (NACE 92.00) – is not included among the activities covered by the EU Taxonomy, so it is treated as non-eligible within this framework. Non-gaming operations represent less than 4% of total revenue and were therefore left out of the assessment. Additionally, following guidance in the new Delegated Act, we decided not to report on OpEx eligibility because the related activities – such as research and development, building renovations, short-term leases, maintenance, repairs, and other daily costs for maintaining assets – are not significant.

As a result, our eligibility review focused on capital expenditures, meaning investments made in tangible or intangible fixed assets during the reporting period before depreciation, amortisation, or revaluation. We identified the following activities for taxonomy eligibility assessment:

- 6.5 Transport by motorbikes, passenger cars and light commercial vehicles: acquisition of new leased vehicles
- 7.3 Installation, maintenance and repair of energy efficient equipment
- 7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)
- 7.5 Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings
- 7.6 Installation, maintenance and repair of renewable energy technologies
- 8.1 Data processing, hosting and related activities

Since the proportion of taxonomy-eligible CapEx is far below the 10% threshold and is considered immaterial, we have decided not to move forward to the alignment phase.

# Accounting Methodology

## E1 – Gross scope 1, 2, 3 GHG emissions

In calculating greenhouse gas emissions, Allwyn applied the GHG Protocol, a globally recognised standard for measuring and managing greenhouse gas emissions. The inventory was prepared in accordance with the GHG Protocol Corporate Accounting and Reporting Standard and the GHG Protocol Corporate Value Chain (Scope 3) Standard, in order to ensure consistent reporting of direct emissions, indirect energy emissions and relevant value chain emissions. In line with the GHG Protocol, the greenhouse gases considered in the inventory were CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub> and NF<sub>3</sub>.

The Group's organisational boundary was defined using the operational control approach. The 2025 Group inventory was consolidated from entity-level calculations covering all operating entities. This approach was applied consistently across the inventory to support Group-level consolidation and reporting.

The 2025 inventory includes Scope 1, Scope 2 and the relevant Scope 3 categories identified for the Group's business model. In 2025, quantified Scope 3 categories comprised Purchased Goods and Services, Capital Goods, Fuel- and Energy-Related Activities, Upstream Transportation, Waste Generated in Operations, Business Travel and Accommodation, Employee Commuting, Upstream Leased Assets, Use of Sold Products and Services, End-of-Life Treatment of Sold Products, Franchises and Investments, Downstream Transportation and Distribution, Processing of Sold Products and Downstream Leased Assets were assessed within the Group methodology and resulted in zero emissions in the 2025 inventory.

Emission factors were selected on the basis of relevance, geography and data quality, with preference given to the most representative and latest available source for the given activity. For the 2025 calculation, Allwyn used Ecoinvent 3.12 for waste and purchased water; Hotel Footprint Tool for hotel accommodation in business travel; DEFRA 2025 for fuels in Europe, employee commuting, upstream transportation and business travel; EPA for fuels in the United States, waste in the United States and electricity in the United States; AIB 2024 for Scope 2 electricity factors in Europe; CaDI 2024 for Scope 3.3 electricity-related factors in Europe; Eurostat for conversions used in deriving monetary energy factors in Europe; ADEME 23.9 for spend-based purchased goods and services; Czech Hydrometeorological Institute / National Inventory Report data for selected fuel-related factors in Czech Republic; and supplier-specific emission factors where available.

Where contractual instruments carrying energy attribute information were available and met the requirements of the GHG Protocol Scope 2 Guidance, they were used as the basis for the calculation of market-based Scope 2 emissions. In Europe, Guarantees of Origin represented the principal contractual instrument used by the Group. Where such instruments were not available, the calculation followed the applicable market-based hierarchy and used the best available residual or supplier-related data source.

## S1 – Characteristics of employees

The figures are stated in total number of employees headcount as of December 31, 2025. Employees are defined as individuals with a standard or temporary employment contract directly with Allwyn, including those working part-time, full-time, and with nonguaranteed working hours. For the purpose of determining the number of employees, the headcount comprises only active employees. Active employees are those who are on the payroll, paid by the company, and whose employment contract has not been terminated as of December 31 of the reporting year.

The geographic distribution of employees is calculated by aggregating the total headcount of employees within the specific geographical locations where our entities are located.

The percentage of employee turnover is calculated as the number of employees who have left the Group (due to voluntary leaving, dismissal, retirement or death) during the reporting period, divided by the average number of employees headcount with a standard contract for the reporting period.

### S1 – Collective bargaining

The figures are based on the head count of employees as of December 31, 2025.

### S1 – Average number of training hours per employee

Training includes primarily mandatory training as well as voluntary training. These include various methods such as on-site training, online courses, workshops, certification programmes and other learning opportunities. The figures are based on the headcount of employees as of December 31, 2025. Only active employees are included. Active employees are those who are on the payroll, paid by the company, and whose employment contract has not been terminated as of December 31, 2025.

### S1 – Health and safety metrics

The figures are based on the headcount of employees as of December 31, 2025.

The number of occupational accidents involving employees during the period under review is recorded in the local occupational health and safety management systems of the Group's entities. The consolidated number refers to the total number of occupational accidents, regardless of their severity.

The recorded accident rate represents the number of cases of work-related accidents per one million hours worked. It is calculated by dividing the number of cases recorded in the reporting period by the aggregate number of hours worked in the Group and multiplying by one million.

The total number of days lost is calculated from the first full day of absence to the last day of absence, encompassing all calendar days within the specified period, including weekends and public holidays.

## Accounting Methodology continued

### S4 – Annual number of visits to the responsible gaming page

The total number of visits recorded between January 1 and December 31, 2025 refers to the aggregate visits to the dedicated Responsible gaming pages maintained by our operators. These pages offer comprehensive information on available tools, resources, and treatment partners within each respective market.

### S4 – Total visits to educate retail partners and staff regarding the prevention of underage gaming

The total number of visits recorded between January 1 and December 31, 2025 is applicable exclusively to our retail operators where account-based play is not implemented.

### S4 – Total number of employees completing responsible gaming training

The total number of employees who completed responsible gaming training between January 1 and December 31, 2025. This pertains to recorded figures for the completion of tracked responsible gaming training by employees of our operators. This does not refer to training of the retail network of our respective businesses. Additional specialised training, team-wide training days, seminars, expert sessions and other engagement with clinical experts is not included in this figure.

### G1 – Total Number of Significant Cyber Security Incidents

Intentional malicious activity emphasises the deliberate nature of incidents, clearly distinguishing security incidents from operational incidents. There is an impact on information systems or data, which can result in operational disruption, financial loss, and effects on other entities.

### G1 – Contributions to social investments

The monetary donations are recognised when the donation or contribution is paid out.

G1 – The human rights incidents in scope for this disclosure are those that relate to not respecting internationally recognised human rights. These incidents are understood as the number of substantiated instances of judicial and non-judicial proceedings that have been initiated (such as cases before domestic courts and tribunals, mediation and complaints filed with the National Contact Points for OECD Multinational Enterprises)

G1 – Fines, penalties and compensation' refers to those imposed on the undertaking through judicial and non-judicial proceedings.

G1 – Convictions for the violation of anti-corruption and anti-bribery laws refer to final decisions issued by a criminal court against an individual or undertaking in respect of a criminal offence related to corruption and or bribery, where these court decisions are entered in the criminal record of the convicting European Union Member State or, if outside the EU, in the equivalent register or record of the jurisdiction concerned

G1 – Sanctions for the violation of anti-corruption and anti-bribery laws refer to final decisions issued by administrative or regulatory authorities against an individual or undertaking in respect of corruption or bribery.

G1 – Fines issued for the violation of anti-corruption and anti-bribery laws refer to mandatory monetary penalties resulting from violations of anti-corruption and anti-bribery laws imposed by a court, commission, administrative or other government regulatory authority, which are paid to a public treasury, and which are recognised in the undertaking's financial statements during the reporting period.

## Additional information

### Disclosure requirements covered by the ESG report

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BP-2	Disclosures in relation to specific circumstances	2
GOV-1	Role of the administrative, management and supervisory bodies	35
GOV-2	Information provided to and sustainability matters addressed by administrative, management and supervisory bodies	13
GOV-3	Integration of sustainability-related performance in incentive schemes	46
GOV-4	Statement on due diligence	64
GOV-5	Risk management and internal controls over sustainability reporting	14
SBM-1	Strategy, business model and value chain	4
SBM-2	Interests and views of stakeholders – general	8
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	11
IRO-1	Description of process to identify and assess material impacts, risks and opportunities	10
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	14
<b>ESRS E1</b>	<b>Climate change</b>	
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E1-1	Transition plan for climate change mitigation	17
E1-2	Policies related to climate change mitigation and adaptation	17
E1-3	Actions and resources in relation to climate change policies	22
E1-4	Targets related to climate change mitigation and adaptation	17
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## Additional information continued

Disclosure requirement	Description	Page
<b>ESRS E5</b>	<b>Resource use and circular economy</b>	
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E5-3	Targets related to resource use and circular economy	24
E5-4	Resource inflows	24
<b>ESRS S1</b>	<b>Own workforce</b>	
S1-SBM2	Interests and views of stakeholders	8
S1-SBM3	Material impacts, risks and opportunities and their interaction with strategy and business model	11
S1-1	Policies related to own workforce	29
S1-2	Processes for engaging with own workers and workers' representatives about impacts	29
S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	29
S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	11
S1-6	Characteristics of undertaking's employees	30
S1-8	Collective bargaining coverage and social dialogue	32
S1-9	Diversity metrics	33
S1-13	Training and skills development metrics	33
S1-14	Health and safety metrics	32
S1-15	Work-life balance metrics	32
S1-17	Incidents, complaints and severe human rights impacts -general	33

## Additional information continued

Disclosure requirement	Description	Page
<b>ESRS S4</b>	<b>Consumers and end-users /Responsible gaming</b>	
SBM-2	Interests and views of stakeholders	8
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business mode	12
S4-1	Policies related to consumers and end-users	35
S4-2	Processes for engaging with consumers and end-users about impacts	39
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	38
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	12
<b>ESRS G1</b>	<b>Business conduct</b>	
G1-1	Business conduct policies and corporate culture	45
G1-3	Prevention and detection of corruption and bribery	46
G1-4	Confirmed incidents of corruption or bribery	39

## Additional information continued

The table below includes all of the datapoints that derive from other EU legislation as listed in ESRS 2 appendix B, indicating where the data points can be found in our report and which data points are assessed as 'Not material'.

Disclosure requirement	Data point	Sustainability statements / Appendix	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Location / Page
<b>ESRS 2</b>							
ESRS 2 GOV-1	21 (d)	Board's gender diversity	●		●		13
ESRS 2 GOV-1	21 (e)	Percentage of board members who are independent			●		13
ESRS 2 GOV-4	30	Statement on due diligence	●				64
ESRS 2 SBM-1	40 (d) i	Involvement in activities related to fossil fuel activities	●	●	●		N/A
ESRS 2 SBM-1	40 (d) ii	Involvement in activities related to chemical production	●		●		N/A
ESRS 2 SBM-1	40 (d) iii	Involvement in activities related to controversial weapons	●		●		N/A
ESRS 2 SBM-1	40 (d) iv	Involvement in activities related to cultivation and production of tobacco			●		N/A
<b>ESRS E1</b>							
ESRS E1-1	14	Transition plan to reach climate neutrality by 2050				●	17
ESRS E1-1	16 (g)	Undertakings excluded from Paris-aligned Benchmarks		●	●		N/A
ESRS E1-4	34	GHG emission reduction targets	●	●	●		17
ESRS E1-5	38	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	●				N/A
ESRS E1-5	37	Energy consumption and mix	●				21
ESRS E1-5	40-43	Energy intensity associated with activities in high climate impact sectors	●				N/A
ESRS E1-6	44	Gross Scope 1, 2, 3 and Total GHG emissions	●	●	●		20
ESRS E1-6	53-55	Gross GHG emissions intensity	●	●	●		20

## Additional information continued

Disclosure requirement	Data point	Sustainability statements / Appendix	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Location / Page
<b>ESRS E1 continued</b>							
ESRS E1-7	56	GHG removals and carbon credits				●	N/A
ESRS E1-9	66	Exposure of the benchmark portfolio to climate-related physical risks			●		N/A
ESRS E1-9	66 (a); 66 (c)	Disaggregation of monetary amounts by acute and chronic physical risk; Location of significant assets at material physical risk		●			N/A
ESRS E1-9	67 (c)	Breakdown of the carrying value of its real estate assets by energy-efficiency classes		●			N/A
ESRS E1-9	69	Degree of exposure of the portfolio to climate-related opportunities			●		N/A
<b>ESRS E2</b>							
ESRS E2-4	28	Amount of each pollutant listed in Annex II of the E-PRTR Regulation emitted to air, water and soil	●				N/A
<b>ESRS E3</b>							
ESRS E3-1	9	Water and marine resources	●				N/A
ESRS E3-1	13	Dedicated policy	●				N/A
ESRS E3-1	14	Sustainable oceans and seas	●				N/A
ESRS E3-4	28 (c)	Total water recycled and reused	●				N/A
ESRS E3-4	29	Total water consumption in m <sup>3</sup> per net revenue on own operations	●				N/A

## Additional information continued

Disclosure requirement	Data point	Sustainability statements / Appendix	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Location / Page
<b>ESRS E4</b>							
ESRS 2 – SBM 3 – E4	16 (a) i	List of material sites in its own operations, including sites under its operational control	●				N/A
ESRS 2 – SBM 3 – E4	16 (b)	Material negative impacts with regard to land degradation, desertification or soil sealing	●				N/A
ESRS 2 – SBM 3 – E4	16 (c)	Operations that affect threatened species	●				N/A
ESRS E4-2	24 (b)	Sustainable land / agriculture practices or policies	●				N/A
ESRS E4-2	24 (c)	Sustainable oceans / seas practices or policies	●				N/A
ESRS E4-2	24 (d)	Policies to address deforestation	●				N/A
<b>ESRS E5</b>							
ESRS E5-5	37 (d)	Non-recycled waste	●				N/A
ESRS E5-5	39	Hazardous waste and radioactive waste	●				N/A
<b>ESRS S1</b>							
ESRS 2 – SBM 3 – S1	14 (f)	Risk of incidents of forced labour	●				33
ESRS 2 – SBM 3 – S1	14 (g)	Risk of incidents of child labour	●				33
ESRS S1-1	20	Human rights policy commitments	●				45
ESRS S1-1	21	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			●		N/A
ESRS S1-1	22	Processes and measures for preventing trafficking in human beings	●				N/A
ESRS S1-1	23	Workplace accident prevention policy or management system	●				32

## Additional information continued

Disclosure requirement	Data point	Sustainability statements / Appendix	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Location / Page
<b>ESRS S1 continued</b>							
ESRS S1-3	32 (c)	Grievance/complaints handling mechanisms	●				47
ESRS S1-14	88 (b) and (c)	Number of fatalities and number and rate of work-related accidents					32
ESRS S1-14	88 (e)	Number of days lost to injuries, accidents, fatalities or illness	●		●		32
ESRS S1-16	97 (b)	Excessive CEO pay ratio	●		●		N/A
ESRS S1-17	103 (a)	Incidents of discrimination	●				33
ESRS S1-17	104 (a)	Non-respect of UNGPs on Business and Human Rights and OECD	●		●		N/A
<b>ESRS S2</b>							
ESRS 2 – SBM 3 – S2	11 (b)	Significant risk of child labour or forced labour in the value chain	●				N/A
ESRS S2-1	17	Human rights policy commitments					N/A
ESRS S2-1	18	Policies related to value chain workers	●				N/A
ESRS S2-1	19	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	●		●		N/A
ESRS S2-1	19	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			●		N/A
ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	●				N/A
<b>ESRS S3</b>							
ESRS S3-1	16	Human rights policy commitments	●				N/A
ESRS S3-1	17	Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines	●		●		N/A
ESRS S3-4	36	Human rights issues and incidents	●				N/A

## Additional information continued

Disclosure requirement	Data point	Sustainability statements / Appendix	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Location / Page
<b>ESRS S4</b>							
ESRS S4-1	16	Policies related to consumers and end-users	●				45
ESRS S4-1	17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	●	●			N/A
ESRS S4-4	35	Human rights issues and incidents	●				N/A
<b>ESRS G1</b>							
ESRS G1-1	§10 (b)	United Nations Convention against Corruption	●				46
ESRS G1-1	§10 (d)	Protection of whistle blowers	●		●		47
ESRS G1-4	§24 (a)	Fines for violation of anti-corruption and anti-bribery laws	●				49
ESRS G1-4	§24 (b)	Standards of anti corruption and anti-bribery	●				49

NA – not applicable

## Statement on due diligence

	Paragraphs in the sustainability statement
Embedding due diligence in governance, strategy and business model	👁️ Read more on pages 8, 10, 49
Engaging with affected stakeholders in all key steps of the due diligence	👁️ Read more on pages 49
Identifying and assessing adverse impacts	👁️ Read more on pages 10
Taking actions to address those adverse impacts	👁️ Read more on pages 17, 24, 30, 37, 49
Tracking the effectiveness of these efforts and communicating	👁️ Read more on page 8, 29

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