
SUPPLIER CODE OF CONDUCT

INDEX

1.	PURPOSE	2
2.	SCOPE	3
3.	REFERENCES.....	3
4.	PRINCIPLES.....	4
4.1	INCLUSION	4
4.2	BUSINESS ETHIC AND REGULATORY FRAMEWORK	4
4.3	HUMAN RIGHTS AND LABOUR PRACTICES	5
4.4	REGULATORY CONSIDERATIONS.....	6
4.5	CONFLICT MINERALS	6
4.6	HEALTH AND SAFETY	7
4.7	ENVIRONMENTAL REGULATIONS AND PROTECTION	7
4.8	CONFIDENTIAL AND PROPRIETARY INFORMATION	7
4.9	ACCESSIBLE PROCUREMENT	7
5.	IMPLEMENTATION AND MONITORING	7
6.	COMMUNICATION AND TRAINING	8
7.	ROLES AND RESPONSIBILITIES.....	8
8.	REPORTING CONCERNS	8
9.	HISTORY OF THE DOCUMENT	9
10.	DEFINITIONS, ABBREVIATIONS & ACRONYMES	9



1. PURPOSE

Brightstar Lottery PLC and its subsidiaries (collectively, “BRIGHTSTAR”) strive to maintain the highest level of business standards and ethics, and we strongly encourage our Suppliers to follow our example. Our Suppliers are selected and evaluated beyond the basis of economic measures. We expect our Suppliers to fully comply with applicable laws and to adhere to internationally recognized environmental, social, and corporate governance standards. Our commitment to these business standards of excellence includes business ethics and regulatory compliance, human rights and labor practices, environmental regulations and protection, responsible mineral sourcing, health and safety, and confidential and proprietary information.


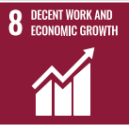
We expect that our Suppliers share our values and our commitments. We also expect our Suppliers to use their best efforts to implement these standards with their vendors and subcontractors.



This Code supports the delivery of Brightstar Lottery’s (Brightstar) sustainability strategy, which is guided by three key elements:

- (1) Empowering Our People**
- (2) Collaborating with Partners**
- (3) Preserving the Planet**

These elements are activated through six spheres of impact, which are dedicated actions that ignite change. They include employee engagement; human rights; responsible gaming; community engagement; sustainable procurement; and climate action, biodiversity, and circularity. This code focuses on the sustainable procurement sphere of impact, which supports two of the Company’s three sustainability pillars — Collaborating with Partners and Preserving the Planet.

At Brightstar, sustainable procurement centers on selecting responsible suppliers who prioritize environmental stewardship and ethical labor practices. The Company’s sustainable procurement initiatives support four Sustainable Development Goals (SDGs), as defined by the United Nations (UN). They include:

SDGs	
	<p>Goal 7: Affordable and clean energy. Ensure access to affordable, reliable, sustainable, and modern energy for all.</p>
	<p>Goal 8: Decent Work and Economic Growth Promote sustained, inclusive and sustainable economic growth,</p>

	<p>Goal 12: Responsible consumption and production. Ensure sustainable consumption and production patterns.</p>
	<p>Goal 13: Climate action. Take urgent action to combat climate change and its impacts.</p>

2. SCOPE

This Supplier Code of Conduct outlines our expectations regarding the workplace standards and business practices of our Suppliers, along with their parent entities, subsidiaries, affiliates, subcontractors, and others who are within their supply chain. The expectations contained in this Supplier Code of Conduct are essential to our decisions to enter or extend existing business relationships. Each Supplier is responsible for ensuring that its employees, representatives, and subcontractors understand and comply with these guidelines. The expectations outlined in this Supplier Code of Conduct do not replace specific requirements in contracts. Rather, this Supplier Code of Conduct is intended to supplement the specific requirements in contracts. If a contractual term is stricter than the terms in this Supplier Code of Conduct, the Supplier must meet the stricter contractual requirement.

3. REFERENCES

This policy is supported by recognized international standards, regulations, and industry frameworks that guide responsible sourcing and due diligence practices for conflict minerals. The following references establish the foundation for our approach and ensure alignment with applicable legal and sustainability requirements.

This code supports the following treaties of international law and standards by applying their founding principles:

- UN Global Compact
- UN Universal Declaration of Human Rights
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- United Nations (UN) Guiding Principles on Business and Human Rights
- International Bill of Human Rights
- Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises

- Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act
- ISO 14001 Environmental Management Systems
- ISO 20400 Sustainable Procurement

Internal references

The following Brightstar's internal documents are linked to the principles listed in this Code and support its implementation:

- Brightstar's Sustainable Procurement Policy
- Brightstar's Code of Conduct
- Brightstar's Anti-Corruption and Ethics Policy
- Brightstar's Environmental Policy
- Brightstar's Conflict Minerals Policy
- Brightstar's Safe and Healthy Work Environment Policy
- Brightstar's Product Responsibility Policy
- Brightstar's Human Rights Policy
- Brightstar's Global Sustainability Policy

4. PRINCIPLES

4.1 INCLUSION

It is BRIGHTSTAR's policy to provide contracting opportunities regardless of race, color, religion, gender, sexual orientation, gender identity or expression, pregnancy, marital status, national origin, citizenship, covered veteran status, ancestry, age, physical or mental disability visible and invisible disability, medical condition, genetic information, or any other legally protected status in accordance with local, state and federal laws.

4.2 BUSINESS ETHIC AND REGULATORY FRAMEWORK

All BRIGHTSTAR Suppliers must conduct their business interactions and activities with integrity and must strictly comply with all laws and regulations related to bribery, corruption, money laundering and counterterrorism financing, and prohibited business practices.

- Global Trade: Suppliers must comply with all applicable laws and regulations governing export, re-export, and import of products.
- Antitrust: Suppliers must conduct business in accordance with antitrust and fair competition laws.

- Whistleblower Protections: Suppliers must protect worker whistleblower confidentiality and must create a mechanism for all workers to submit grievances anonymously.
- Compliance with Global Anti-Corruption Laws: Suppliers represent and warrant that they and their officers, directors, employees or agents comply with all Global Anti-Corruption Laws.
- Compliance with Global Anti-Tax Evasion Laws: Suppliers shall not engage in any activity, practice, or conduct that would constitute either a U.K. tax evasion offence, a U.K. tax evasion facilitation offence, or an equivalent foreign tax evasion offence or tax evasion facilitation offence for either BRIGHTSTAR or Suppliers. Suppliers represent and warrant that they and each of their representatives follow all Anti-Tax Evasion Laws, including those against the facilitation of tax evasion.
- Media: Suppliers shall not speak to the news media on behalf of BRIGHTSTAR unless they are expressly authorized in writing to do so by the BRIGHTSTAR Corporate Communications department.
- Business Courtesies: Suppliers must avoid giving gifts to BRIGHTSTAR employees, offering anything of value to obtain or retain a benefit or advantage for the giver, and offering anything that might appear to influence, compromise judgment, or oblige the BRIGHTSTAR employee. If offering a gift, meal, or entertainment to BRIGHTSTAR employees, always use good judgment, discretion, and moderation.
- Conflicts of Interest: Suppliers shall avoid the appearance of or actual improprieties or conflicts of interests. Suppliers must not cause any conflicts of interest for BRIGHTSTAR employees and must avoid situations where a conflict of interest may occur.
- Insider Trading: If a Supplier learns of any material non-public information while working with BRIGHTSTAR, they must not share that information with others or use it for market trading.
- Business Continuity: Suppliers shall be prepared for any disruptions of their businesses (e.g., natural disasters, terrorism, software viruses, illness, pandemic, infectious diseases). This preparedness especially includes disaster plans to protect both employees and the environment as far as possible from the effects of possible disasters that arise within the domain of operations.

4.3 HUMAN RIGHTS AND LABOUR PRACTICES

BRIGHTSTAR expects its Suppliers to share its commitment to promoting and respecting human rights and equal opportunity in the workplace in addition to comprehensive labor rights protections (covering: working hours, minimum living wages, weekly rest period in accordance with the ILO Weekly Rest Conventions, maximum weekly working time in accordance with the ILO Hours of Work Conventions, premium pay for overtime, prohibition of disciplinary wage deduction, and wage transparency.)

All Suppliers are expected to conduct their employment practices in full compliance with all applicable laws and regulations and must, without limitation, take attention to:



Child Labor and Young Workers: Supplier shall not employ children under the age of 15. If national laws or regulations allow children between the ages of 13 and 15 to perform light work, such work is not permitted under any circumstances if it would hinder a minor from the completion of compulsory schooling or training, or if the employment would be harmful to their health or development.

Forced Labor and Modern Slavery: Suppliers must ensure that they do not participate in, or benefit from, any form of forced labor (including bonded labor, debt bondage, forced prison labor, slavery, servitude, or human trafficking). Suppliers will refrain from retaining the identity cards, travel documents, and other important personal papers of their employees. BRIGHTSTAR publishes a Human Rights Policy Statement located on our website.

Harassment and Non-Discrimination: Suppliers are expected to keep their workplaces free of harassment, harsh treatment, violence, intimidation, corporal punishment, mental or physical coercion, verbal abuse, and discrimination.

Inclusion: Suppliers should, when appropriate, encourage a commitment to the economic inclusion, and where possible, track certified diverse spending.

Work Hours and Wages: Suppliers shall comply with the respective national laws and regulations regarding working hours, wages, and benefits.

Freedom of Association and Collective Bargaining: Suppliers must allow their employees the freedom of association and collective bargaining in accordance with applicable laws and regulations.

4.4 REGULATORY CONSIDERATIONS

Suppliers must comply with all applicable environmental laws, pollution prevention, waste management, biodiversity, no deforestation and land conservation regulations, and standards, as well as implement an effective system to identify and eliminate potential hazards to the environment. Suppliers should work for continual improvement in their environmental management systems and continuously improve their environmental performance. Suppliers should follow the principles of reducing, reusing, and recycling. Furthermore, Suppliers shall strive to reduce their consumption of energy and resources, as well as their waste and emissions.

An Environmental Policy is available on Brightstar's website. Suppliers must comply with all relevant requirements of this policy as a condition of doing business with the Company and are expected to take appropriate measures to ensure compliance with their operations and supply chains.

4.5 CONFLICT MINERALS

BRIGHTSTAR complies with the final rule on conflict minerals adopted by the U.S. Securities and Exchange Commission. This rule requires the implementation of reporting and disclosure procedures regarding conflict minerals. BRIGHTSTAR expects that Suppliers conduct appropriate due diligence to identify, disclose, and take remedial action if their products contain conflict minerals that are used to finance conflict in the Democratic Republic of Congo or adjoining countries. Individuals and Suppliers having concerns



regarding conflict minerals non-compliance and or conflict mineral violations are directed to report that to the BRIGHTSTAR PLC Integrity Line which is managed by an independent provider. The Integrity Line is a confidential way to anonymously report non-compliance or violations via telephone or the online portal, contact details of which can be found at BrightstarLottery.com.

The Conflict Minerals Policy is available on Brightstar's website.

4.6 HEALTH AND SAFETY

Suppliers must ensure that their workers are provided with safe, suitable, and sanitary work facilities. Suppliers must have effective health and safety prevention and remediation policies and procedures in place that comply with industry, national, and international law and regulations. Suppliers must provide to employees and their own suppliers and subcontractors protective equipment and training necessary to perform their tasks safely.

4.7 ENVIRONMENTAL REGULATIONS AND PROTECTION

Suppliers are required to comply with all applicable environmental laws, regulations, and standards, and to establish effective processes to identify, assess, and mitigate environmental risks and impacts. They are expected to promote the continual enhancement of their environmental management practices and overall performance. Suppliers should adopt circular economy principles, including the reduction, reuse, and recycling of materials. In addition, suppliers are encouraged to optimize the use of energy and natural resources, while minimizing waste generation and emissions across their activities.

4.8 CONFIDENTIAL AND PROPRIETARY INFORMATION

BRIGHTSTAR Suppliers must ensure the protection of all sensitive information, such as confidential and protected personal information that must be used only for business purposes. For all information transferred electronically, Suppliers are expected to implement appropriate security mechanisms and systems, and to notify BRIGHTSTAR of any suspected or actual data breaches. Furthermore, BRIGHTSTAR expects its Suppliers to protect BRIGHTSTAR's personally identifiable information from unauthorized access, destruction, changes, use, and disclosure.

4.9 ACCESSIBLE PROCUREMENT

Suppliers are encouraged to deliver goods and services that are accessible to everyone, including those with disabilities. If accessibility standards – for example, Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, included in US Section 508 Amendment to the Rehabilitation Act of 1973, and the harmonized EN 301 459 including WCAG 2.1 Level and the European Accessibility Act (EAA) – are applicable for the goods or services delivered, Suppliers are strongly encouraged to take these standards into consideration and take reasonable steps to meet them. BRIGHTSTAR is committed to helping our Suppliers create a culture of accessibility and helping everyone get the most out of Supplier relationships.

5. IMPLEMENTATION AND MONITORING



If cases of non-compliance with BRIGHTSTAR's Supplier Code of Conduct are found, BRIGHTSTAR and its Suppliers will develop ways and means to correct the non-compliance, provided BRIGHTSTAR receives the commitment from the Suppliers to correct the non-compliance within due time. Suppliers must promptly inform their BRIGHTSTAR contact when any situation develops that causes Suppliers to operate in violation of this Supplier Code of Conduct.

Suppliers conducting business with Brightstar, including those registering, onboarding, contracting, or invoicing are expected to comply with all applicable laws and regulations and to operate in accordance with the highest standards of ethical conduct, integrity, and transparency. Suppliers must respect internationally recognized human rights, consistent with the United Nations Guiding Principles on Business and Human Rights and applicable International Labour Organization standards, including prohibitions on forced labor, child labor, discrimination, harassment, and abuse, and requirements for fair wages, lawful working hours, and safe and healthy working conditions. Suppliers shall comply with applicable environmental, health, safety, anti-corruption, trade compliance, data protection, and information security laws and shall not engage in bribery, fraud, or other improper business practices.

Suppliers are responsible for the accuracy, completeness, and truthfulness of all information submitted and are expected to apply these standards, as appropriate, within their own supply chains. Suppliers must cooperate with Brightstar in providing information, completing questionnaires, and participating in assessments or audits related to compliance with this Code.

6. COMMUNICATION AND TRAINING

The Supplier Code of Conduct is formally communicated to all suppliers and made readily available during the supplier onboarding process and through our procure-to-pay (P2P) system. Suppliers are required to review and electronically acknowledge the Code as part of initial onboarding and again at defined intervals or when material updates occur. Targeted training and awareness communications are provided as needed to reinforce expectations, with frequency determined by supplier risk, category, or regulatory changes. Acceptance and certification of compliance are captured directly within the P2P system, ensuring traceable documentation and ongoing adherence throughout the supplier's lifecycle.

7. ROLES AND RESPONSIBILITIES

Procurement Governance Team leads this effort through setting and enforcing sourcing policies, ensuring regulatory and ethical compliance across jurisdictions, managing supplier risk, and maintains fair, transparent, and accountable procurement practices aligned with business and public trust requirements.

8. REPORTING CONCERNS

If you have any concerns or questions about the content of this document, or to get support from BRIGHTSTAR to help build your capabilities in relation to any of the areas

detailed in the Supplier Code of Conduct, please send questions to Procurement.Operations@Brightstarlottery.com.

9. HISTORY OF THE DOCUMENT

History of the Document		
Date	Version	Updates
April 2026	Version 1	Final update to new Brightstar Template

10. DEFINITIONS, ABBREVIATIONS & ACRONYMES

Term / Acronym	Full Name / Definition
Conflict Minerals	Minerals requiring due diligence due to conflict financing risks
ILO	International Labour Organization
ISO	International Organization for Standardization (e.g., ISO 14001, ISO 20400)
OECD	Organisation for Economic Co-operation and Development
P2P	Procure-to-Pay system
SDGs	Sustainable Development Goals
Supplier Code of Conduct	Document defining supplier requirements and standards
UN	United Nations