
HUMAN RIGHTS POLICY

INDEX

1. PURPOSE	2
2. SCOPE	3
3. REFERENCES	3
4. PRINCIPLES	4
5. IMPLEMENTATION AND MONITORING	7
6. COMMUNICATION AND TRAINING	7
7. ROLES AND RESPONSIBILITIES	7
8. REPORTING CONCERNS	8
9. HISTORY OF THE DOCUMENT	9
10. DEFINITIONS, ABBREVIATIONS, ACRONYMS	9



1. PURPOSE

This policy establishes principles and practices for respecting human rights and wellbeing. Human dignity and welfare are core tenets of this policy, which promotes the belief that all human beings have fundamental rights and that Brightstar Lottery (Brightstar) can only truly thrive in communities that adhere to this fundamental principle. Brightstar is dedicated to ensuring that external stakeholders' rights are respected and upheld, fostering an environment that prioritizes human rights across all interactions and partnerships.

This policy also outlines Brightstar's sustainability strategy, which is guided by three key elements: Empowering Our People, Collaborating with Partners, and 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 policy focuses on the human rights and employee engagement spheres of impacts, which activate two of the Company's three sustainability pillars — Empowering our People and Collaborating with Partners.

At Brightstar, human rights refers to the Company's respect for human and labor rights, the prioritization of employee health and safety, the protection of vulnerable groups, and the promotion of inclusivity throughout Brightstar's operations and value chain. Brightstar supports employee engagement by fostering a positive work environment through the promotion of welfare and wellbeing, and by enhancing employees' skills through training and development.

The Company's human rights and employee engagement initiatives support three Sustainable Development Goals, as defined by the United Nations. Please refer to section "4. Principles" for further details.

SDGs	
	Goal 3: Good health and well-being Ensure healthy lives and promote well-being for all at all ages.
	Goal 8: Decent work and economic growth Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.



Goal 10: Reduced inequalities
Reduce inequalities within and among countries.

2. SCOPE

This policy applies to all Brightstar employees, interns, contingent workers, directors, officers, and consultants. Third parties, agents, representatives, business partners (e.g. suppliers) who deal with or act on behalf of Brightstar and its controlled affiliates are also expected to abide by these principles in all that they do on behalf of the Company.

3. REFERENCES

Regulatory references

This policy supports the following treaties of international law and standards, applying their founding principles:

- United Nations (UN) Global Compact
- UN Universal Declaration of Human Rights
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- 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
- UN Declaration on the Rights of Indigenous Peoples
- Children's Rights and Business Principles (UNICEF)

Brightstar adheres to all applicable laws and regulations in the jurisdictions where the Company operates. In the event of a conflict between the Company principles and any local laws, regulations, and/or applicable collective bargaining agreements, the latter shall prevail. In such an event, Brightstar will seek to uphold these principles to the greatest extent possible.

Standards

- ISO 26000 – Social Responsibility
- ISO 20400 – Sustainable Procurement
- ISO 45001 — Occupational health and safety management systems
- SA8000 — Corporate Social Responsibility

Internal references

The following Brightstar internal documents, among others, are linked to the principles listed in this Policy and support its implementation:



- Code of Conduct
- Anti-Corruption Compliance and Ethics Policy
- Supplier Code of Conduct
- Board Diversity Policy
- Non-Harassment and Bullying Policy
- Equal Opportunity & Non-Discrimination
- Safe & Healthy Work Environment
- Brightstar Whistleblower Policy
- Data Protection and Privacy Policy
- Environmental Policy
- Community Policy
- Global Sustainability Policy

The Company's commitment to advancing human rights is exhibited in the above codes and policies, which are to be read in conjunction with the general Principles outlined in this Policy.

4. PRINCIPLES

Brightstar strives to meet its responsibility to uphold human rights by acting in accordance with the following principles:

Child Labor

The Company believes that all children have the right to receive an education and to enjoy their youth. Exploitation of children is antithetical to human progress. Brightstar prohibits the employment of any person under the age of 18 or under the minimum working age, based on local labor regulations, for any purpose other than educational, and strictly prohibits any minor from engaging in work which requires exposure to hazardous conditions. Brightstar is committed to respecting and promoting children's rights in all its activities, in accordance with standards set by Children's Rights and Business Principles. This commitment extends beyond the prevention of child labor and includes the protection of children's welfare, safety, education, and participation in communities where the Company operates.

Corruption

Corruption prevents people and communities from reaching their full potential, as it cripples Company institutions and degrades Company values. Brightstar observes all relevant anti-corruption laws and regulations in jurisdictions where the Company operates and implements extensive internal safeguards against unscrupulous practices. Brightstar maintains robust control procedures, including defined approval processes, segregation of duties, monitoring, and audits, to prevent and detect improper conduct. The Company promotes transparency through accurate record keeping, clear documentation, and accountability across all business activities



Disciplinary Practices

Brightstar demands that all employees be treated with dignity and respect. The Company has zero tolerance for the use of corporal punishment, mental or physical abuse, or other forms of inhumane treatment toward employees.

Forced or Compulsory Labor

Brightstar is committed to ensuring that all people possess freedom of choice and movement in partnership with the Company, on mutually agreed terms. Brightstar strictly prohibits any form of forced or compulsory labor, including but not limited to compulsory prison labor, indentured or bonded labor, and any form of slavery or human trafficking.

Freedom of Association & Collective Bargaining

Brightstar recognizes the right of Company employees to form and join unions, as well as the right to collectively bargain through a legally recognized organization. Brightstar condemns efforts to harass, intimidate, or retaliate against anyone based on their decisions on whether to engage in such activities. The Company is committed to negotiating in good faith with a union's authorized representatives.

Health & Safety

Employee health and safety is a guiding value of Brightstar. The Company is committed to complying with all applicable laws, regulations, and supplemental internal guidelines, while continuously improving its industry-leading practices. Brightstar also endeavors to instill a culture of vigilance. Employees are encouraged to bring any workplace concerns to the Company's attention, so that identified risks can be investigated and remediated. Brightstar also has a commitment to continuous improvement and ongoing monitoring of safety KPIs.

Human Capital Development

Brightstar is committed to the ongoing training and development of employees, facilitating an environment and culture of continuous growth. The Company works toward creating learning experiences that meet people where they are in their careers, whether that be leaders, people managers and/or individual contributors. Learning and development include instructor-led courses as well as self-paced, e-learning opportunities. Additionally, the Company has launched an enterprise-wide AI upskilling program to promote AI adoption.

Human Rights & the Community

Brightstar is continuously mindful that the Company activities impact the communities in which it operates. Brightstar is committed to respecting local rights and helping communities flourish. The Company strives to be a good neighbor and partner by actively engaging in communications with stakeholders and undertaking efforts to positively impact local educational, social, and economic development. The Company continuously works to identify, assess, and mitigate potential adverse impacts on human rights from its operations.



Human Rights & the Environment

Brightstar believes that protecting the environment is vital to protecting human beings and promoting human rights. In addition to ensuring compliance with all relevant laws, the Company is committed to implementing sustainable practices through programs that reduce emissions and energy consumption and increase energy efficiency. Such programs are administered in accordance with responsible and careful management of manufacturing processes, distribution activities, and material use. Brightstar minimizes the impact of waste production and ensures the efficient use of water. The Company is continuously evaluating its practices to ensure that it is a good steward of the environment.

Inclusivity

The Company recognizes that diverse backgrounds, experiences, abilities, and perspectives contribute to a fair and inclusive culture that allows everyone at Brightstar to feel valued, respected, supported, and engaged.

The Company does not discriminate when making decisions about hiring, promotions, training, professional development, and compensation levels. The factors on which the Company bases these decisions are competence, performance, and merit.

Non-Discrimination

Brightstar condemns any form of discrimination, harassment, or bullying in its interactions, whether aimed at coworkers, applicants, customers, or members of the public. Every person is to be treated with the utmost respect and decency regardless of race, nationality, citizenship, religion or belief, age, gender, sexual orientation, gender identity or expression, marital status, pregnancy or parenthood, veteran status, physical or mental disability, genetic information, or other legally protected status under applicable law.

Privacy

Safeguarding the privacy of personal data is critical to maintaining trust and personal dignity. The Company recognizes that the modern world has generated enormous challenges concerning the generation and dissemination of information. The Company is committed to conscientiously collecting, utilizing, and storing data in compliance with all relevant laws and internal policies.

Rights of Indigenous Peoples

Brightstar respects and promotes the rights, the territories, and the customs of indigenous people around the world. The Company believes that Indian and other indigenous people have the right to preserve their unique customs, traditions, and institutions free from interference, while enjoying the rights available to all others in broader society, free from discrimination. The Company is committed to maintaining a constructive dialogue to address concerns regarding potential detrimental impacts of the Company's operations on these communities.



Wages & Hours

Brightstar compensates its employees in compliance with all applicable laws, regulations, and collective bargaining agreements, and strives to be mindful of their need to attend to personal needs and desires. Brightstar also believes in equal pay for work of equal value based on objective assessments of work performed.

Brightstar also has a clear commitment to promoting work-life balance.

5. IMPLEMENTATION AND MONITORING

The Company's ambition in promoting human rights leads Brightstar to uphold these principles in all its operations and throughout its value chain. The Company believes all companies should promote human rights as an essential commitment to a safer and fairer working environment, for all individuals, in every country.

Brightstar implements this policy by practicing its principles in Company business, employee training, and by taking appropriate disciplinary action, up to and including termination of employment, for violations, except where prohibited by law or contrary to local collective bargaining agreements. Brightstar reserves the right to amend this policy at any time, and it shall be read to constitute a contract between the Company and any employee, including any agreement which alters any employees' at-will status. Acts outlined herein that may result in employee disciplinary action do not limit Brightstar's right to discipline for conduct not specifically described in this policy.

Brightstar is committed to conducting due diligence throughout its operations to actively assess and avert potential human rights issues.

6. COMMUNICATION AND TRAINING

Communicating commitments over time stimulates continuous improvement and supports corporate reputation, a sense of belonging and attractiveness. The Company is committed to advancing human rights and strengthening its culture by fostering awareness and sensitivity around the principles it upholds.

Employees receive annual training on this policy, inclusive of an acknowledgement that they have reviewed and agree to abide by its contents. As part of the Company human rights strategy, Brightstar has published this policy on its website (www.brightstarlottery.com) to encourage its suppliers and customers to observe its principles.

7. ROLES AND RESPONSIBILITIES

This policy has been developed by targeted Brightstar cross-functional working groups focused on the promotion of human rights within the Company and across its supply chain.

The Senior Vice-President of People and Culture own this policy and is accountable for its implementation and compliance across all operations. As a member of the Sustainability



Steering Committee (SSC), the Senior Vice-President of People and Culture contribute to defining the Company's long-term sustainability goals, ensures consistency of practices across regions, and promotes effective communication and the sharing of best practices. The Global Sustainability team manages environmental, social and governance matters, reporting to the Senior Vice President of Branding, Communications and Sustainability, who also serves as Chair of the SSC. In this role, the Chair reports to the Nominating and Corporate Governance Committee (NCGC) — which monitors Brightstar's sustainability strategy — and to the Board's Executive Chair, who oversees the Company's corporate governance and sustainability initiatives and provides strategic guidance.

This structure guarantees that human rights stewardship remains embedded in decision-making and operational practices throughout the organization. Moreover, as mentioned above, the internal audit (IA) department verifies compliance with this policy.

8. REPORTING CONCERNS

Implementing human rights reporting is a critical step in Brightstar upholding ethical standards, building stakeholder trust, and complying with evolving global regulations. By systematically documenting policies, due diligence processes, and remediation efforts, organizations not only demonstrate accountability but also proactively identify and mitigate risks across their operations and supply chains.

Transparent reporting enables companies to align with international frameworks such as UN Guiding Principles and OECD Due Diligence Guidance, while also responding to growing investor and consumer expectations for responsible business conduct. Ultimately, robust human rights reporting fosters resilience, enhances reputation, and contributes to long-term sustainable value creation. To align with human rights reporting globally, Brightstar commits to:

- The United Nations Guiding Principles on Business and Human Rights (UNGPs) where companies are expected to “know and show” how they respect human rights, and to the
- Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct.

Employees who are aware of perceived violations of this policy should immediately report the incident to any member of Brightstar's management team, People and Culture, or to the Integrity Line (managed and operated by an independent third party), which can be accessed via the following:

- Online Portal: <https://brightstarlottery.integrityline.com>
- From the United States and Canada call: 1-888-807-4832
- From Italy call: 800194674
- From all other locations, first call the country-specific AT&T Direct Access Code found at <https://www.business.att.com/bt/access.jsp> and then call 888-807-4832.



Agents and representatives of Brightstar, third parties, and members of the public are also encouraged to report any perceived violations of the Company principles to the Integrity Line. Reports to the Integrity Line can remain anonymous if desired.

Any allegation of a human rights violation brought to the Company's attention will be promptly investigated. It is expected that all parties will cooperate with the investigation process. Retaliation against any individual for reporting a perceived human rights violation or assisting in an investigation in good faith will not be tolerated.

9. HISTORY OF THE DOCUMENT

The policy is periodically reviewed and updated to ensure that it remains relevant and effective.

History of the Document		
Date	Version	Updates
December 21, 2021	Version 1	First Release
February 2026	Version 2	Format change and content aligned to ESRS standards

10. DEFINITIONS, ABBREVIATIONS, ACRONYMS

The following table shows specific terms used in the policy and a brief definition of them.

Term / Abbreviation	Definition
ESG	Environmental, social, and governance matters.
ESRS	European Sustainability Reporting Standards, the EU's mandatory standards that define how companies must report comparable, reliable sustainability and Environmental, Social, and Governance information under the Corporate Sustainability Reporting Directive.
IA (Internal Audit)	Function responsible for auditing compliance with this Policy.
ILO Declaration	ILO Declaration on Fundamental Principles and Rights at Work.
ILO Fundamental Conventions	Core international labor standards adopted by the ILO.
Integrity Line	Independent, third-party reporting channel for raising concerns or potential violations.
ISO 20400	International guidance on sustainable procurement.
ISO 26000	International guidance on social responsibility.
ISO 45001	Occupational health and safety management system standard.

NCGC (Nominating and Corporate Governance Committee)	Board committee responsible for monitoring the Company's sustainability strategy.
Non-employees	Interns, contingent workers, directors, officers, and consultants.
OECD Guidelines	OECD Guidelines for Multinational Enterprises on responsible business conduct.
SA8000	International standard for social accountability and labor practices.
SDGs	United Nations Sustainable Development Goals referenced in the policy.
SSC (Sustainability Steering Committee)	Management committee overseeing sustainability strategy, chaired by the SVP of Branding, Communications and Sustainability.
Third Parties	Business partners, agents, representatives, suppliers, and customers acting for or with Brightstar.
UDHR	Universal Declaration of Human Rights.
UNDRIP	UN Declaration on the Rights of Indigenous Peoples.
UN Global Compact	UN initiative promoting responsible business practices.
UNGPs	United Nations Guiding Principles on Business and Human Rights.