

CODE OF CONDUCT FOR SUPPLIERS

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1. Introduction

We, the Casinos Austria AG and Austrian Lotteries Group (hereinafter referred to as the "C&L Group" or "Group"), set high ethical standards for ourselves and for our suppliers. As part of its social responsibility, the Group is committed to promoting sustainable development. As part of this, the Group is concerned with the environmental, social and economic impact of its activities and those of its suppliers. This Code of Conduct for Suppliers reflects our values and is intended to ensure that we as a Group and our suppliers comply with legal and ethical frameworks.

Our suppliers play a key role in the success of our company. By working closely with our partners in the supply chain, we want to ensure that our standards and values are upheld along the entire value chain. They not only contribute to the quality of our services and products, but also help us to develop innovative and sustainable solutions that meet our customers' expectations. Selecting and maintaining sustainable supplier relationships is therefore essential to achieve long-term corporate goals while having a positive impact on society and the environment. A strong network of reliable and responsible suppliers is an essential part of our corporate strategy.

This Code of Conduct for Suppliers is based on the Universal Declaration of Human Rights, the principles of the [UN Global Compact](#), [ONR 192500](#) (Social Responsibility), [SA8000](#) (Social Standard), the [OECD Guidelines for Multinational Enterprises](#), [ISO 140001](#) (Environmental Management), [ISO 50001](#) (Energy Management), [ISO 45001](#) (Occupational Health and Safety) and [ISO 27001](#) (Information Security)

2. Scope of Application

The Code of Conduct for Suppliers applies to all our service providers, consultants, agents and other third parties acting on our behalf (hereinafter referred to as "Suppliers") and extends to their full-time, temporary and agency workers. It supplements, but does not replace, the Group's [Code of Conduct and Ethics](#)¹, the existing supplier contracts or the General Terms and Conditions and relevant purchasing provisions.

Our suppliers must always conduct their business with integrity and are obliged to comply with applicable national and international laws, regulations and standards. In addition, our suppliers should also require their upstream suppliers to comply with this Code.

3. Compliance with Laws and Regulations

Compliance with all laws, regulations and standards in this Code is a fundamental requirement for the business relationship between suppliers and the C&L Group. This includes, but is not limited to:

3.1. Labor Law

Our suppliers must comply with all labor law provisions, including regulations on working hours, remuneration, employment conditions and the protection of employee rights.

3.2. Environmental Laws (see also "[Protecting the Environment](#)")

Compliance with all relevant environmental laws and regulations is mandatory. Suppliers are required to take measures to prevent pollution and promote sustainable practices.

¹ The C&L Group's Code of Conduct and Ethics sets out the general rules of behavior when dealing with customers and guests, suppliers, governments, agencies, politicians, competitors and colleagues.

3.3. Health and Safety

Suppliers must comply with all legal requirements relating to health and safety in the workplace. This includes ensuring safe working conditions and avoiding health risks for employees.

3.4. Trade and Economic Regulations

Suppliers are required to comply with all applicable trade and economic regulations, including export controls, customs regulations and anti-dumping laws.

3.5. Anti-Corruption Laws

Strict compliance with all anti-corruption laws is mandatory. This includes the prohibition of bribery, illegal payments and other corrupt practices.

4. Working Conditions

All suppliers must commit to respecting the fundamental rights of workers and ensuring fair working conditions. This includes:

4.1. Human Rights

Suppliers are obliged to respect and promote the human rights of their employees. This includes in particular:

- a. **Prohibition of forced labor:** Any form of forced, bonded or involuntary labor is strictly prohibited.
- b. **Prohibition of child labor:** Suppliers must not use child labor and must ensure that the minimum age laws of the respective countries are observed.
- c. **Anti-discrimination:** Any form of discrimination based on gender, age, religion, ethnic origin, sexual orientation, disability or other protected characteristics is prohibited.

4.2. Working Hours and Remuneration

Suppliers must ensure that the working hours of their employees comply with applicable legal requirements and that overtime is only accumulated within the scope of the legal provisions. Employees are entitled to fair and punctual remuneration that is at least equal to the statutory minimum wage or the minimum wage customary in the industry.

4.3. Health and Safety

Suppliers are obliged to create and maintain a safe and healthy working environment. This includes:

- a. **Training courses:** Provide regular training on occupational health and safety.
- b. **Accident prevention:** Implementation of suitable measures to prevent accidents at work and occupational illnesses.
- c. **Equipment and protection:** Provision of the necessary protective equipment and facilities to ensure the health and safety of workers.

4.4. Freedom of Association

Freedom of association and the right of workers to form or join trade unions and to bargain collectively must be respected to the extent permitted by local law.

5. Protecting the Environment

Suppliers are obliged to promote environmentally friendly practices in their business activities and to minimize their impact on the environment. This includes:

5.1. Compliance with Environmental Laws and Due Diligence and Traceability Rules

Suppliers must comply with all applicable national and international environmental laws, regulations and standards as well as the resulting due diligence and traceability rules. This includes compliance with regulations on emissions control, deforestation, waste disposal and chemical management.

5.2. Efficient Use of Resources

Suppliers should take measures to use resources such as water, energy and raw materials efficiently. Reducing the consumption of resources and promoting reparability, recycling and reuse are key components of a sustainable approach to the environment.

5.3. Waste and Emissions Management

Suppliers must implement procedures to minimize waste and emissions. This includes:

- a. **Waste reduction:** Development of strategies to minimize waste and properly dispose of unavoidable waste.
- b. **Emission control:** Monitoring and reduction of emissions to air, water and soil to prevent environmental pollution.

5.4. Environmentally Friendly Products and Technologies

Suppliers are encouraged to develop and use products and technologies that are environmentally friendly and reduce the ecological footprint. This includes the use of sustainable materials and energy-efficient processes.

5.5. Emergency Preparedness

Suppliers must implement plans and procedures to prevent and manage environmental accidents and disasters to minimize potential environmental damage.

6. Ethical Business Conduct

Suppliers are required to maintain high ethical standards in all aspects of their business activities. This includes:

6.1. Fighting Corruption

Suppliers must strictly reject all forms of corruption, bribery and unethical behavior. This includes:

- a. **Prohibition of bribery:** No acceptance or granting of bribes, kickbacks or other benefits to influence business decisions.
- b. **Gifts and invitations:** The handling of gifts and invitations must be transparent and in line with legal regulations. We expect our suppliers to have internal guidelines governing the handling of gifts and invitations.

Employees of the C&L Group are prohibited from receiving gifts and invitations that are intended to influence a business decision. They are also prohibited from requesting gifts or invitations from suppliers. Should such an incident occur, we

ask our suppliers to report the incident via the C&L Group's whistleblower system ([C&L Integrity Line](#)).

6.2. Conflicts of Interest

Suppliers must take measures to appropriately regulate conflicts of interest through internal guidelines.

Personal or business interests must not conflict with obligations owed to the C&L Group.

6.3. Preventing and Combating Money Laundering

Our suppliers agree to comply with all applicable laws and regulations to combat money laundering and the financing of terrorism. They must take appropriate measures to ensure that their business practices do not contribute to concealing the origin of illegal funds. This includes screening business partners, complying with due diligence obligations and reporting suspicious transactions to the relevant authorities without delay.

6.4. Data Protection, Information Security and Confidentiality

Suppliers must maintain the confidentiality of all business information and comply with applicable data protection laws. This includes the protection of confidential data, personal information and business secrets. In addition, they are obliged to implement comprehensive information security measures. This includes protection against unauthorized access, data loss, cyber attacks and other threats.

The security measures used should comply with current standards and be regularly reviewed and updated to ensure the integrity and availability of the information.

6.5. Fair Competition

Suppliers are obliged to respect the principles of fair competition and to comply with all applicable antitrust laws and regulations. Unfair business practices such as price fixing or market manipulation are strictly prohibited.

6.6. Responsibility in the Supply Chain

Suppliers should ensure that their own subcontractors and business partners also comply with ethical business practices. The passing on of the requirements of this Code of Conduct for Suppliers to subcontractors is expressly expected.

In addition, we expect our suppliers and employees to provide all information necessary for a risk analysis upon request to be able to organize our risk management appropriately and effectively.

7. Complying with the Agreement and Consequences of Breaches

We expect our suppliers and all employees of the C&L Group to act with integrity in all business activities. Any violations of our ethical standards by employees or suppliers must be reported as soon as they become known.

We expect our suppliers to comply with this Code of Conduct for Suppliers and integrate the expectations into their daily business operations. In addition, our suppliers should communicate the information within this document to all their employees to ensure that the expectations are understood and implemented.

Compliance with the obligations arising from the Code of Conduct for Suppliers can be verified at any time by the C&L Group or by independent third parties. This may occur in the form of audits, self-assessments, supplier meetings or other appropriate measures.

A breach of an obligation under this Code of Conduct for Suppliers may have a significant impact on the partnership between the client (C&L Group) and the supplier. In the event of a breach, this may lead to the immediate termination of the contract or termination.

8. Contact

For further information or if you have any questions about this document, please contact our Compliance Team. You can reach us by e-mail at: compliance@cal.at