

Title: Whistleblower Policy and Procedure For Reporting Violations

Revision: Version 4-January 21, 2020

Effective Date: July 31, 2017

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## Scope

This Policy applies to all employees, officers, directors and consultants of the Company and its subsidiaries worldwide.

## Policy

This Whistleblower Policy is designed to encourage individuals to report ethical misconduct. Ethical misconduct includes activities that:

- Are unlawful;
- May lead to incorrect financial reporting;
- Raise questions about the integrity of management;
- Are not consistent with Company policy, including the Code of Conduct;
- Amount to serious improper conduct; or
- Raise concerns about a workplace condition or activity that could have an adverse impact on the health, safety, or well-being of IGT employees or third parties.

It is the Policy of the Company to encourage employees, officers, directors and consultants to report suspected or known ethical misconduct, through regular reporting channels, or to the Chief Compliance Officer, the General Counsel, the People & Transformation Department, the Environmental, Health and Safety Department, "Ask the Chief Compliance Officer" mailbox or through the Integrity Line.

It is the responsibility of management to work with their P&T People Partner to ensure the Compliance Department is notified promptly of all suspected or known violations of the Code of Conduct, law, Company policy, or health and safety concerns. In addition, each individual has an obligation to cooperate during the course of an investigation.

**Procedure:** All reports of unethical misconduct should be reported through regular reporting channels. Reports may also be made through the following channels:

*Compliance Department*  
[compliance@igt.com](mailto:compliance@igt.com)

*Legal Department*  
[legal@igt.com](mailto:legal@igt.com)

*People & Transformation Department*  
[PeopleServices@igt.com](mailto:PeopleServices@igt.com)

*Environmental, Health and Safety Department*  
[safety@igt.com](mailto:safety@igt.com)

If an individual is uncomfortable with any of these methods, the individual may report the matter through the Integrity Line.

**Integrity Line.** The Company has established an Integrity Line for employees, officers, directors and consultants to confidentially and anonymously report activities that may involve unethical or unlawful conduct. The Integrity Line and online portal is answered 24 hours a day, seven days a week, 365 days a year by an independent organization. Employees, officers, directors and consultants may give their name when calling the Integrity Line,

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but they are not required to do so. No recording, tracking, or tracing devices are used in connection with the Integrity Line.

#### **INTEGRITY LINE**

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.

The online portal can be reached via your computer or your mobile device:  
<https://igt.integrityline.org>

Nothing in this Policy is intended to discourage employees from reporting concerns to a government agency.

### **Responsibilities:**

Integrity Line Reports and Other Inquiries. IGT's Compliance Department receives all Integrity Line reports. Supervisors and managers receiving reports of suspected or known violations of the Code of Conduct, law or Company policy, or health and safety concerns, shall immediately advise and forward the allegation or complaint to the Compliance Department for appropriate handling and investigation. Managers and supervisors should not conduct any fact-finding or investigations without the authorization of the Compliance and Legal Departments.

Initiating Internal Investigations. After receiving a report of unethical misconduct, the Compliance Department will determine the next steps to be taken, including which IGT department or personnel should address the matter and the nature and scope of an internal or external investigation and if such investigations are warranted. The Legal Department will be consulted and will provide advice regarding next steps for allegations of violations of law. If it is reasonable to conclude under the circumstances that a material violation is ongoing or is about to occur, the Chief Compliance Officer and/or the General Counsel shall immediately notify the Chairman of the Audit Committee of the Board of Directors. In all other circumstances, investigation reports, findings and recommendations will be reviewed in a reasonable and timely manner by the Chief Compliance Officer or by the appropriate IGT department or personnel, and by the General Counsel where violations of law are alleged. The Chief Compliance Officer and/or General Counsel will review Investigation findings with the Audit Committee of the Board of Directors.

Health and Safety concerns will be directed to the Environmental, Health and Safety Department for handling and will report its findings and disposition of any reported concerns or investigation to the Compliance and Legal Departments.

Conducting an Internal Investigation. The Compliance and Legal Departments will coordinate and identify who will be responsible for conducting the investigation, define the scope of the investigation in an investigative plan and establish reporting lines. Any ensuing investigation will be supervised by the Legal Department for an attorney-client privileged investigation. Except for attorney-client privileged investigations, an internal team having a sufficient level of expertise and knowledge with regard to the issue presented will be assembled to investigate all matters. Use of external investigators requires the express approval of the General Counsel, with concurrence from the Chief Compliance Officer. A strategy will be developed to assess the validity of the allegations and appropriate actions will be taken to preserve the attorney-client privilege and work product doctrine, as well as the confidentiality of the ensuing inquiry. The investigative plan will include:

- (a) The length of time required for the investigation;

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- (b) The collection, organization and analysis of key documents, all of which are to be marked for identification and preservation of all applicable privileges; and
- (c) Identification of potential witnesses and whether in-house or outside counsel will handle the interviews.

Conclusion of the Investigation. Once the investigation is completed, the investigator shall document the results in a report, including as appropriate, a finding as to whether the case is substantiated or unsubstantiated, findings of fact, and recommended disciplinary or corrective action needed, if any. The investigator will follow-up with the parties involved in the report as necessary.

Documentation. All records of reports made shall be retained by the Compliance Department, and will be destroyed according to federal, state, and local law and regulations.

Non-Retaliation: IGT prohibits its employees, officers, directors and consultants from discharging, demoting, suspending, threatening, harassing, or in any way retaliating or discriminating against an individual who in good faith reports suspected or known violations the Code of Conduct, law, Company policy, or health and safety concerns. No disciplinary or other action will be taken based solely on a call report from the Integrity Line or an inquiry to the Compliance Department or any of the other reporting channels identified in this Policy.

Employees who intentionally make false reports of ethical misconduct are subject to discipline, up to termination, according to IGT's discipline policy. Employees who file reports of ethical misconduct for illegal purposes are subject to appropriate legal action by IGT or any applicable governmental entities.

Modification: The Company reserves the right to modify or amend this Policy at any time as it may deem necessary.

## Definitions

N/A

## Purpose

IGT is committed to the principles of being Responsible, Collaborative, Authentic, Passionate, and Pioneering. These principles and standards ensure that all employees feel comfortable reporting ethical misconduct without fear of retaliation.

## Ownership

Compliance

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### Revision History:

Revision	Date	Description of changes	Requested By
1	7/31/2017	Initial	Amy Fuller
2	7/31/2018	No changes	Amy Fuller
3	7/31/2019	Minor changes	Amy Fuller
4	01/21/2020	Minor changes; update to phone numbers	Lara Abramovitz