



## Global Sustainability Policy

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## 1. INTRODUCTION

International Game Technology PLC (together with its subsidiaries, the “Company” or “IGT”) is a global leader in gaming that delivers entertaining and responsible gaming experiences for players across all channels and regulated segments, from lotteries and gaming machines to digital gaming and sports betting. Leveraging a wealth of compelling content, substantial investment in innovation, player insights, operational expertise, and leading-edge technology, the Company’s solutions deliver gaming experiences that responsibly engage players and drive growth. The Company has relationships with governments and regulators around the world and creates value while adhering to the highest standards of service, integrity, and responsibility.

The Company operates and provides an integrated portfolio of innovative gaming technology products and services, including lottery management services, online and instant lottery systems, electronic gaming machines, gaming systems, digital lottery, digital gaming, sports betting, instant ticket printing and commercial services.

IGT’s commitment to sustainability represents the Company’s objective to serve the global gaming market according to disciplined principles of ethics and integrity. IGT prioritizes responsible and sustainable practices that encompass a broad spectrum of sustainability initiatives, including the Company’s energy use, environmental and human rights issues, and establishing policies and strategic initiatives, such as its Responsible Gaming Policy and Community Giving & Engagement Policy.

In an effort to maintain sustainability leadership and grow the business responsibly, IGT has established a structured and dedicated governance framework, which includes high standards of Environmental, Social and Governance (“ESG”) practices.

### 1.1 Scope

The IGT Sustainability Policy (the “Policy”) defines the framework for sustainability at IGT and provides a governing platform for the Company’s sustainability work in all key areas of business activity, including providing services, working with suppliers, employee interaction and industry-affecting activities.

The Policy applies to all employees, board members, consultants, and contractors of IGT, and its subsidiaries and affiliates, as well as their suppliers.

The IGT Global Sustainability Team will review this Policy regularly.

## 2. SUSTAINABILITY GOVERNANCE

IGT commits to growing its business responsibly through a structured and dedicated governance framework, which includes high standards of ESG practices.

## **Nominating and Corporate Governance Committee**

IGT's Nominating and Corporate Governance Committee (the "NCGC") oversees the Company's strategy on sustainability and monitors implementation of the Company's sustainability program (including reviews of the Company's public disclosures regarding ESG matters). The NCGC reports the most significant or meaningful matters relating to sustainability to the IGT Board of Directors (the "Board") so that the Directors are aware of their evolution. In conjunction with the IGT Compensation Committee (the "CC"), the NCGC also oversees, engagement with investors/shareholders and proxy advisory firms on ESG matters, with the outcome of such engagements reported to the full Board.

Furthermore, IGT's Audit Committee (the "AC") oversees financial reporting, internal controls, internal and external audit processes, the risk assessment, and risk management process (including climate-related and cybersecurity risks), as well as compliance with laws and regulations in the jurisdictions where the Company operates. The chair of the AC regularly reports to the Board on the committee's activities and makes appropriate recommendations on matters or issues arising within its responsibilities, and AC and NCGC share responsibilities over different aspects of the Company's climate change reporting obligations.

## **Sustainability Steering Committee**

IGT's Sustainability Steering Committee (the "SSC") was established in 2021 with the mandate of creating an aligned sustainability approach across all businesses and regions. To pursue this objective, the SSC evaluates and approves a Global Sustainability Plan (the "Plan") that aligns and integrates with business priorities. This includes cultivating a long-term vision and related objectives on sustainability, fostering a consistent sustainability approach across all businesses and regions and increasing communication on sustainability by sharing best practices at global and local levels. The Plan identifies areas for improvement in the Company's sustainability performance with respect to external and internal drivers, defines initiatives and actions to bridge identified gaps and strengthen IGT's commitment to its sustainability priorities.

The SSC: (i) promoting sponsors and promotes internal communication and training activities; (ii) monitors priorities, objectives and activities; and (iii) reviews IGT's annual materiality analysis<sup>1</sup> and annual Sustainability Report (the "Report").

## **Global Sustainability Working Groups**

At the operating level, IGT has established Global Sustainability Working Groups (each, a "Group" and together, the "Groups"), each comprised of representatives from different departments across the organization. The Groups are responsible for analyzing sustainability initiatives and defining action plans around: Community Engagement, Commitment to Diversity, Human Capital Development, Respect for Human Rights, Sustainable Procurement, Wellness at Work and Environment Care.

## **Global Sustainability Team**

The Company has established a Global Sustainability team (the "Team") dedicated to: (i) designing and leading sustainability initiatives within the Plan, including the coordination of the

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<sup>1</sup> A materiality analysis is a process that enables a business to identify their most important areas to focus on so that they can be highlighted as a priority, as well as to understand which are of most concern to stakeholders and how they impact the business model (and vice versa)

Groups; (ii) coordinating data collection and monitoring of systems leveraged to complete ESG-related questionnaires<sup>2</sup> and reports; (iii) drafting the Report in compliance with applicable international standards; (iv) leading the development and implementation of a global community engagement strategy and the creation of related partnerships with non-profit associations; and (v) driving global responsible gaming initiatives that are consistent with industry standards.

Through the development of the Plan, IGT aligned sustainability priorities with business priorities under the theme of “Inspiring Global Transformation”, reinforcing the Company’s commitment to sustainability and its purpose-driven mission. Approved by the SSC in July 2022, the Plan aims to further integrate sustainability along the entire value chain and improve ESG impact in daily operations. This includes a comprehensive set of targets and actions that drive IGT towards its priorities and ambitions.

### 3.SUSTAINABLE PLAY: IGT’S SUSTAINABILITY PROGRAM

In 2023, IGT launched Sustainable Play, a global sustainability program which aligns the sustainability plan and strategy. Sustainable Play represents IGT’s commitment to leading the gaming industry in global sustainability. It celebrates the Company’s dedication to its people and planet as we strive to deliver innovation and excellence that is “Ahead of the Game.” Key priorities driving Sustainable Play include: (i) valuing and protecting people; (ii) advancing responsibility; (iii) supporting our communities; and (iv) fostering sustainable operations. Aligned with UN Sustainable Development Goals, IGT seeks to advance the gaming industry with sustainable practices that benefit the Company and its key stakeholders.

The Policy establishes the guiding principles toward preserving our planet and advancing people while pursuing business growth. It compels the organization to implement and monitor policies, procedures and practices across four pillars:

**1. Valuing and Protecting Our People.** IGT strives to uphold Diversity, Equity and Inclusion (“DEI”) Inclusion principles throughout the organization to promote equal opportunities and foster an inclusive work environment. To support talent acquisition and retention, the Company offers corporate health and well-being initiatives and defines paths for professional growth that allow employees the opportunity achieve their highest professional potential. IGT firmly rejects discriminatory behavior, seeking to ensure fair labor and favorable working conditions with respect to health and safety standards and the protection of human rights.

Where titles are underlined policies are publicly available and reachable through the embedded link.

- **Human Rights Policy Statement.** The Human Rights Policy Statement calls for all employees worldwide to understand, respect, and uphold global human rights as outlined in the Global Human Rights Policy.
- **Diversity, Equity & Inclusion Global Policy.** Backed by IGT leadership, the Diversity, Equity, and Inclusion seeks to create a fair and inclusive culture that values unity, diversity and belonging among our people, players, customers, and communities. IGT commits to ensuring that its workforce reflects the diversity of the global customers and communities the Company serves.

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<sup>2</sup> IGT’s sustainability efforts are routinely evaluated and recognized by environmental and ESG rating agencies, and IGT is committed to improving the quality of information disclosed about the conduct of its business.

- **Global People & Transformation Policy: Safe and Healthy Work Environment.** IGT seeks to maintain a safe and healthy work environment for all employees. IGT expects full cooperation during inquiries and investigations to take every possible action to ensure a safe and healthy work environment.
- **Global People & Transformation Policy: Equal Employment Opportunity & Non-Discrimination.** IGT seeks to provide equal employment opportunities for all employees on the basis of qualification and merit and will not permit discrimination on the basis of personal characteristics (including 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, medical condition, genetic information or any other legally protected status in accordance with applicable local, state and federal laws).
- **Non-Harassment and Bullying Policy.** IGT is committed to maintaining an environment where everyone is treated with fairness, dignity, and respect. IGT will not tolerate any form of sexual, racial, ethnic, or other harassment or bullying of employees by other employees, management, customers, vendors or the public.

**2. Advancing Responsibility.** IGT seeks to adhere to the highest ethical standards. The Company employs a risk management approach designed to ensure the highest levels of security and quality of products and services. IGT maintains a long-standing commitment to player protection by maintaining fair and transparent relations with customers, regulators, research institutes and advocacy groups that promote tools to prevent problem gambling and match-fixing, and the Company encourages all users to uphold healthy play behaviors. In addition, IGT strives to foster and maintain the trust of all stakeholders by complying with all requirements and regulations on data protection.

IGT has embedded safeguards for directors, advisors, customers, employees, players, suppliers and the environment, among others, in a system of codes, policies, guidelines, and best practices designed to protect these stakeholders from the risk of illicit behaviors.

- **Anti-Corruption Compliance and Ethics (ACE) Policy.** IGT's Anti-Corruption Compliance and Ethics ("ACE") Policy, along with Code of Conduct, compel directors, officers, employees, consultants, contractors and agents to conduct business with integrity and with high ethical standards.
- **Antitrust Policy.** IGT seeks to comply with all U.S. and international, federal, state and local laws, including antitrust and competition laws. The Antitrust Policy covers dealings with competitors, distributors, customers and suppliers by addressing bid rigging, price fixing, market division or customer allocation, industry associations and trade groups, joint ventures and collaborations, group boycotts, intellectual property, mergers and acquisitions and human resources implications.
- **Whistleblower Policy.** The Whistleblower Policy s encourages employees, officers, directors, consultants, suppliers and vendors to report any suspected or actual violations of IGT's Code of Conduct or other activity that may be unlawful, lead to incorrect financial reporting or raise questions about the integrity of management without any fear of retaliation. The Company encourages employees, officers, directors, consultants, and

representatives to report suspected or known violations through regular reporting channels or anonymously through the Company's integrity line.

- **Anti-Money Laundering Policy.** IGT understands the importance of preventing money laundering and terrorism financing. As a gaming company licensed across several jurisdictions, IGT seeks to comply with applicable anti-money laundering/counter terrorism financing ("AML/CTF") laws and regulations. To meet applicable requirements, guidelines, and best practices and to mitigate potential compliance, regulatory and reputational risks associated with violations of applicable AML/CTF laws and regulations, IGT has adopted the Global Anti-Money Laundering Policy. IGT may also adopt and implement local policies and procedures, where required, designed to comply with the Global Anti-Money Laundering Policy and any applicable local law and regulation in the jurisdictions where the Company operates.
- **Government Affairs Policy.** The Government Affairs Policy guides the Company's government relations matters, its contributions related to sponsorships, memberships, donations, charitable, philanthropic, and other contribution activities and its political contributions and provides guidance related to personal political contributions made by the Company's officers and directors, employees, and consultants and others to which this Policy applies.
- **Global Data Protection Policy.** In compliance with applicable worldwide data protection regulatory provisions, IGT appointed Data Protection and Privacy Officers in relevant jurisdictions to monitor the privacy management system and to guide choices at organizational, technological and process levels. In particular, the Data Protection and Privacy Officers are accountable for: developing, implementing, and maintaining privacy policies, procedures, processes and tools in compliance with privacy and data protection legal obligations; and promoting training and ensuring full awareness of data protection by all employees.
- **Global Information Security Policy.** IGT has designed the Global Information Security Policy to safeguard the confidentiality, integrity and availability of all physical and electronic information assets and help the Company fulfill its regulatory, operational and contractual obligations. The Company maintains an information security management framework (complete with information security documentation), including security policies, security standards and security protocols or procedures.
- **Responsible Gaming Policy.** This policy is designed to educate and inform employees and stakeholders about the Company Responsible Gaming initiatives and commitment.
- **IGT Advertising Marketing Code of Principles.** The IGT Advertising and Marketing Code of Principles prescribes principles of responsible marketing for all promotional activities across all media and marketing channels. This includes, but is not limited to, tradeshow messaging and marketing collateral, direct mail, email, or SMS messaging, outdoor, on-property, radio, television, film, mobile devices, print including sales brochures and the internet and applies to marketing activities.

**3. Supporting Our Communities.** IGT's community support efforts, through the Company's non-profit partnerships and sponsorships, seeks to create value for the local communities where the Company operates. IGT utilizes the adopted Sustainable Development Goals (from now on sustainable development goals (or "SDGs")) support community organizations with the goal of assisting in the development of sustainable communities. Moreover, through SDG 4, Quality

Education, the Company encourages and develops education programs and digital learning centers mainly focused on Science, Technology, Engineering and Mathematics (“STEM”) to encourage skills development and aid in the development of a sustainable workforce for the future. IGT supports its employees’ interests by actively engaging with organizations that align with the Company’s overall community support endeavors, and the Company has formalized its commitment to community engagement within various internal policies and procedures.

- **IGT Community Giving & Engagement Policy.** IGT’s Social Impact Committee (“SIC”) reviews and approves on a quarterly basis charitable contributions made through our global charitable giving program in accordance with the IGT Community Giving & Engagement Policy. Namely, IGT encourages employee involvement in community engagement activities that support and enhance IGT’s brand or reputation. Any organization that the Company or any employee group engages with in an official capacity or through an employee program should reflect IGT’s values.

**4. Fostering Sustainable Operations.** IGT promotes responsible behaviors throughout its supply chain by requiring the Company’s suppliers to adhere to the Supplier Code of Conduct, which references compliance with regulations and promotes human rights and environmental protection. With respect to corporate environmental practices, IGT administers programs designed to reduce emissions and increase energy efficiency, and the Company administers such programs in accordance with responsible and careful management of manufacturing processes, distribution activities and material use. The Company also seeks to minimize its environmental footprint and waste production as well as ensure the efficient use of water. IGT officially joined the Science Based Targets initiative and pledged to reduce greenhouse gas (“GHG”) emissions, with these collective efforts reflecting the Company’s commitment to operating as a responsible corporate citizen.

- **Supplier Code of Conduct.** In addition to evaluating and analyzing suppliers based on economic measures, IGT expects our suppliers to fully comply with applicable laws and to adhere to internationally recognized ESG 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.
- **Procurement Policy** IGT’s Procurement Policy establishes guidelines and prudent business practices for obtaining indirect/non-inventoried goods and service and direct/inventoried materials used for manufacturing IGT products. The Procurement Policy seeks to maximize companywide purchasing power, control operating expenses, and ensure compliance with relevant regulations and laws.
- **Environmental Policy** IGT seeks to conduct all aspects of the Company’s business in an environmentally responsible manner. The Environmental Policy covers all IGT entities and facilities worldwide and aligns with the standard environmental positions taken by the various trade associations of which IGT is member. IGT produces the Sustainability Report on an annual basis and commits to periodically disclosing its environmental metrics for all interested stakeholders, including its staff, suppliers, and customers as applicable regulations prescribe.
- **Conflict Minerals Policy** In accordance with Section 1502 of the Dodd Frank Act, IGT has established the Conflict Minerals Policy designed to identify, reduce and eliminate the



use of Conflict Minerals (as defined in the referenced Dodd Frank Act provision) supplied to the Company where proceeds directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo and other Covered Countries (as defined in the same provision).

#### 4. COMPLIANCE, COMMITMENTS AND DEFINITIONS

IGT has the following international commitments and affiliations dedicated to sustainability:

- **UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS**

The United Nations published 17 Sustainable Development Goals (“SDGs”) that collectively form a global blueprint for achieving a better and more sustainable future by 2030. IGT has identified nine (9) SDGs where the Company will commit to allocating necessary attention, efforts and resourcing: (i) no poverty (SDG 1); (ii) good health and well-being (SDG 3); (iii) quality education (SDG 4); (iv) gender equality (SDG 5); (v) affordable and clean energy (SDG 7); (vi) decent work and economic growth (SDG 8) (vii) industry innovation and infrastructure (SDG 9); (viii) reduced inequalities (SDG 10); and (ix) climate action (SDG 13). In addition, IGT has joined the United Nations Global Compact (“UN Global Compact”), the largest worldwide corporate responsibility initiative focused on the development, implementation, and disclosure of responsible corporate policies and practices. In Italy, IGT has identified two (2) additional SDGs of focus: (i) Sustainable Cities and Communities (SDG 11); and (ii) Life below water (SDG 14).

- **THE PARIS CLIMATE AGREEMENT**

An agreement between governments to limit global warming to well below 1.5 degrees Celsius compared to pre-industrial levels.

- **UNITED NATIONS GLOBAL COMPACT PRINCIPLES**

IGT seeks to weave the UN Global Compact principles into the Company’s strategy, culture and day-to-day operations. IGT voluntarily fulfills the annual Communication on Progress, a framework designed to report the Company’s progress implementing the UN Global Compact principles to its stakeholders.

- **GLOBAL REPORTING INITIATIVES STANDARDS**

To govern its sustainability disclosure, IGT utilizes the Global Reporting Initiatives (“GRI”) Standards (the “GRI Standards”). The GRI Standards are a modular system of interconnected standards, which allow organizations to publicly report the impacts of their activities in a structured way that is transparent to stakeholders and other interested parties. The Standards include disclosures on a wide range of topics, from anti-corruption to water, biodiversity to employment, tax to forced labor, they cover relevant topics across the economic, environmental and social dimensions.

- **SCIENCE BASED TARGETS INITIATIVE**

The Science Based Targets initiative (“SBTi”) is a collaboration between the CDP (formerly, the Carbon Disclosure Project), the UN Global Compact, World Resources Institute and World Wide Fund for Nature. SBTi developed and launched the world’s first net zero standard, providing the framework and tools for companies to set science-based net zero targets and limit global temperature rise above pre-industrial levels to 1.5 °C. IGT joined the SBTi in 2021, committing to reduce the Company’s GHG emissions in accordance with prescribed targets. As part of these efforts, IGT submitted near-term

and long-term science-based targets for validation by the SBTi in October 2022, and they have been validated.

- **U.K. AND AUSTRALIAN MODERN SLAVERY ACT**

The U.K. and Australian Modern Slavery Acts require large organizations and companies registered in these countries to disclose measures taken to eliminate slavery throughout a company's business and supply chains. While IGT has a low risk of exposure to slavery due to the highly regulated hence controlled nature of its business, the Company remains committed to taking steps to prevent slavery across the business and supply chain.

- **IGT CODE OF CONDUCT**

The IGT Code of Conduct (the "Code of Conduct") prescribes behaviors deemed appropriate and ethical in the course of business and covers specific risk areas, including but not limited to bribery, global trade, fair competition and environmental responsibility. Every employee is responsible for reading, understanding, and agreeing to abide by the Code of Conduct, and they are required to certify their adherence to the Code of Conduct upon their hire and on an annual basis. IGT provides periodic training on the Code of Conduct to enhance employees' understanding of ethical and legal commitments. The Code of Conduct is available on IGT.com.

- **TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURE GUIDELINES**

IGT has established a path to align the Company's disclosures with part of the Task Force on Climate-Related Financial Disclosure ("TCFD")– Guidelines (the "TCFD Guidelines"), as required by the UK Companies Act. The Company shall report on its oversight of climate-related risks and opportunities (including metrics), its management of climate-related risks, their overall impact on the organization's strategy.

Further, IGT maintains the following international gaming industry commitments and affiliations:

- **EUROPEAN LOTTERIES**

European Lotteries Association ("EL") promotes a sound and sustainable gaming model for the benefit of society, based on the values of subsidiarity, precaution, solidarity, and integrity. IGT representatives cooperate with all EL working groups, and the Company aligns with European Lotteries Standards.

- **WORLD LOTTERY ASSOCIATION**

Within the World Lottery Association ("WLA") Responsible Gaming Principles and Framework, the WHA defines values for businesses operating in the lottery industry based on a commitment to the highest standards of corporate responsibility and respect for the authorized legal systems that determine where and in what form gaming products can be offered within particular geographical or national territory.

- **AMERICAN GAMING ASSOCIATION**

IGT participates as a Member of the Corporate Social Responsibility and Responsible Gaming Committee of the American Gaming Association, a U.S.-based national trade group representing commercial and tribal casino operators, suppliers and other entities affiliated with the gaming industry.

- **ASSOCIATION OF GAMING EQUIPMENT MANUFACTURERS**

As part of IGT's position as a leading global gaming supplier, the Company participates in industry initiatives led by the Association of Gaming Equipment Manufacturers designed to bring awareness to sustainability and other issues.

- **NORTH AMERICAN ASSOCIATION OF STATE AND PROVINCIAL LOTTERIES (NASPL)**  
IGT is an associate member of the North American Association of State and Provincial Lotteries (“NASPL”). NASPL’s seeks to assemble and disseminate information and tout the benefits of state and provincial lottery organizations through education and communications efforts and, where appropriate, publicly advocate its positions on matters of general policy.

## 5. REPORTING

IGT publishes the Sustainability Report on a yearly basis to disclose the Company’s sustainability performance and strategy over a medium and long-time horizon and may periodically provide additional reporting under this Policy as required by applicable laws and regulation.

IGT completes a questionnaire process defined to identify any important ESG and sustainability concerns raised by customers and investors.

As such, IGT commits to actively reporting its sustainability results to promote transparency and adapt to evolving social and environmental principles.

For questions, please contact [Sustainability@igt.com](mailto:Sustainability@igt.com)