



INTERNATIONAL GAME TECHNOLOGY PLC

WHISTLEBLOWER POLICY AND PROCEDURE FOR REPORTING VIOLATIONS

Effective July 31, 2017

PRINCIPLES AND STANDARDS:

IGT is committed to the principles of being Responsible, Collaborative, Authentic, Passionate, and Pioneering. These principles and standards of behavior guide IGT to ensure that all employees feel comfortable speaking up without fear of retaliation.

This Whistleblower Policy is designed to encourage employees to ask questions or raise concerns of suspected or known violations of law or policy, including 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 concern about a workplace condition or activity that could have an adverse impact on the health, safety, or well-being of IGT employees or others (“health and safety concerns”).

These principles and standards establish the protocols for the receipt, documentation and treatment, including internal investigation, of complaints, concerns and reports received by the Integrity Line, Compliance or Legal Departments, or any other employee, officer or director of the Company.

POLICY

It is the Policy of the Company to encourage employees, consultants and representatives to report suspected or known violations of the Code of Conduct, any violation of law, or Company policy, or health and safety concerns, through regular reporting channels, to the Chief Compliance Officer, the General Counsel, the Human Resources Department, the Health and Safety Department, “Ask the Chief Compliance Officer” mailbox or anonymously through the Integrity Line.

It is the responsibility of management to ensure that the Code of Conduct is upheld by all employees, consultants and representatives and to work with their Human Resources Business Partner to ensure the Compliance Department is notified promptly of all suspected or known violations of the Code of Conduct, law or Company policy, or health and safety concerns. In addition, each employee, consultant and representative has an obligation to cooperate fully with personnel conducting an investigation.

The Company prohibits its employees, consultants, and representatives 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, or Company policy, or health and safety concerns.

APPLICABILITY

Scope. This Policy applies to all employees (full and part time), contractors, consultants and representatives of the Company and its majority owned subsidiaries and affiliates worldwide.

Responsibility. All employees, contractors, consultants and representatives are required to understand and adhere to this Policy and create an environment that encourages disclosure without fear of retaliation.

BASIC RULES

Reports of Unethical or Unlawful Conduct or Health and Safety Concerns. Any Individual who knows or has information the individual reasonably believes constitutes a violation of the Code of Conduct, law, or Company policy, or that raises health and safety concerns, should report such information or concerns immediately through regular reporting channels, the Compliance Department, the Legal Department or the Health and Safety Department. This Policy encourages employees to identify themselves when reporting a concern because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Health and safety concerns will be directed to the Health and Safety Department but may be reported through any communications channel an individual is comfortable with.

Compliance Department

compliance@igt.com

Legal Department

legal@igt.com

Human Resources Department

HRServices@igt.com

Health and Safety Department

safety@igt.com

If the individual is uncomfortable with these methods, the individual may report the matter through the Integrity Line. Nothing in this policy is intended to discourage employees from reporting concerns to a government agency.

Integrity Line. The Company has established the Integrity Line for employees, consultants and representatives to confidentially and anonymously report activities that may involve unethical or unlawful conduct. The Integrity Line is answered 24 hours a day, seven days a week, 365 days a year by an independent organization. Employees, consultants and representatives may give their name if they wish when calling the Integrity Line, 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: 800870012

From China call: 4008811459

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.

No Retaliation. The Company strictly prohibits its employees, consultants and representatives 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 of the Code of Conduct, law, or 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 listed above.

PRELIMINARY ASSESSMENT

Integrity Line Reports and Other Inquiries. The Compliance Department receives all Integrity Line intake telephone reports of suspected or known violations of the Code of Conduct, law or Company policy, or health and safety concerns through an independent provider. 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, if warranted. Managers and supervisors should not conduct any fact-finding or investigations without the authorization of the Compliance and Legal Departments.

Preliminary Assessment. The Compliance Department will review reports of suspected or known violations of the Code of Conduct, law or Company policy, or health and safety concerns, to make a preliminary determination of the nature of the allegation, if additional information is needed, if an internal investigation is warranted, and which IGT department or personnel should address the matter.

Health and Safety concerns will be directed to the Health and Safety Department for handling and the Health and Safety Department will coordinate with the Compliance Department and the Legal Department depending on the scope and nature of the reported concerns and in accordance with this policy. The Health and Safety Department will report its findings and disposition of any reported concerns or investigation to the Compliance and Legal Departments.

Actions to be Taken. When a report alleging violations of the Code of Conduct, law or Company policy, or health and safety concerns, is presented, 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.

INTERNAL INVESTIGATIONS BY THE COMPANY

Initiating Internal Investigations. If the Compliance Department determines that a matter warrants an internal investigation, the Compliance Department, in cooperation with the Legal Department, will conduct an internal investigation.

Conducting an Internal Investigation. The Compliance and Legal Departments will coordinate and identify who will be responsible for conducting the investigation, clearly 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 amount of time for the investigation;
- (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 Compliance or Legal Department may document the results in a report, including a recommendation as to whether the case is substantiated or unsubstantiated and recommend appropriate disciplinary or corrective action, if any, to avoid any future misconduct.

DOCUMENTATION AND RECORD RETENTION

Documentation. All Integrity Line reports and other inquiries made to the Compliance Department are recorded in a log and a case file prepared entering the appropriate data. The log will contain at least the following information:

- (a) Name or location of the facility and/or alleged offender
- (b) Date of the call or report
- (c) Nature of the complaint or allegation and any relevant information concerning the same
- (d) Name of caller (unless anonymous)
- (e) Contact telephone number for caller or call back date and case number, if the call is anonymous
- (f) Resolution of report or inquiry
- (g) Retention of logs will be maintained for a period of 7 years after violation investigation is closed.

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

Version History

Version Number	Date
1	7/31/2017
No Change	7/31/2018

Policy Owner: Amy Fuller-Berube