

Environmental, Social and Governance Report **2023**



allwyn

Introduction

What ESG means to us

For Allwyn, ESG is an opportunity to maximise the positive impact we can make in the world. That is why we seek to embed the principles of ESG into daily operations throughout the entire Group. Based on sound corporate governance, we work across functions and markets to protect players, change lives for the better, create opportunities for all, and drive a sustainable future.



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Allwyn at a glance

Who we are:

Allwyn is a leading multi-national lottery operator.

What we do:

We primarily focus on lotteries, including draw-based and instant-win games. We also provide other entertainment offerings, including sports betting, iGaming and video lottery terminals ("VLTs").

How we do it:

We leverage our strong lottery brands, large customer base, and extensive distribution network, including more than 100,000 points of sale (inclusive of Italy).

Where we are:

We operate lotteries in Austria, the Czech Republic, Greece and Cyprus, Italy*, the United Kingdom, and the United States (Illinois).



* In Italy, Allwyn holds a 32.5% interest in LottoItalia, a joint venture with IGT Lottery.

Our international scale:

Several factors set us apart from our peers. For example:

Growing a trusted global business:

Our multi-national scale allows us to benefit from sharing best practice across the Group, save costs, and diversify risk.

Building lotteries of the future:

We follow a digital-first mindset and stay ahead of the curve technologically.

Creating positive impact for all:

Among regulators and industry bodies, we are known for our commitment to responsible gaming and our determination to maximise lotteries' contribution to society.

Maintaining a strong financial profile:

We have a track record of compounding growth, robust profitability, strong cash flow generation, and resilience to economic cycles.

Responsible gaming

Responsible gaming sits at the heart of our strategy for growth. Our lotteries operate under the European Lotteries ("EL") and/or World Lottery Association ("WLA") responsible gaming standards, as appropriate.



**THE EUROPEAN
LOTTERIES**

FOR THE BENEFIT OF SOCIETY



Allwyn's employees gender split:



61%
male



39%
female

Purpose framework

As a lottery operator, we are driven by a strong sense of purpose. Like other lotteries around the world, we create returns for Good Causes, and many of those who choose a career in our sector do so because they want to give back.

A purpose-led approach is therefore a natural fit for Allwyn.

Our purpose
Making play better for all.

Our mission
To build thriving lotteries fuelled by innovation and player protection tailored for a digital era. Our goal is to change lives – a little or a lot – but always for the better.

Our values



We do what is right

Acting with integrity, taking accountability, accepting responsibility. Taking brave decisions consistent with our ethics.



We win together

Valuing our differences and respecting each other. Working as one team to create business value.



We think differently

Daring to innovate, striving for improvement. Learning from feedback, delivering with passion.

Our strategic pillars
Play, Partner, People, Planet



In conversation with our CEO



Robert Chvatal
Chief Executive Officer



How would you describe Allwyn's progress on ESG in 2023?

We have made steady progress. One overarching theme has been improving the way we collect and analyse data from our markets, which will help us increase transparency in our ESG reporting. In addition, I would highlight our progress toward a Group-wide Responsible Gaming Strategy; our new partnership with Wings for Life World Run; our many awards for being a good place to work; and the official start of the process toward setting a verified emissions-reduction target with the Science Based Targets Initiative ("SBTi").



How is Allwyn helping to shape the future of responsible gaming?

Player safety will always be our top priority. Today, we increasingly augment our efforts with the latest technology. Artificial intelligence is in the process of transforming every industry, and the lottery sector is no exception. We have already won multiple awards for our use of AI to identify and mitigate problematic behaviour among players, and we continue to improve these endeavours every year.

"With all of these efforts underway, I can confidently say that ESG at Allwyn has a bright future."

Robert Chvatal
Chief Executive Officer



Why is it so important to foster a unified Group-wide culture?

Our people are the beating heart of our business, and there is so much we can learn from each other. We draw on the diverse perspectives and insights of our colleagues across multiple markets to drive business growth and pioneer better lotteries for the future. A unified culture is critical to ensuring we achieve our mission to protect and build thriving lotteries, underpinned by innovation and player safety that are fit for the digital age.



Why is the new partnership with Wings for Life World Run an important milestone?

Wings for Life World Run is not just another event on our calendar. It lies at the heart of our corporate social responsibility ("CSR") agenda. Through this landmark partnership, we are helping to raise millions for research worldwide to find a cure for spinal cord injuries. Moreover, the lessons we draw from this partnership will help guide our future CSR activities. Our ambition is to support a range of initiatives that contribute to thriving communities, spanning arts, music, education, culture, healthcare, and sport.



Why is the environment an important issue for Allwyn?

Climate change is the critical issue of our time. We want to play our part in the transition to a more sustainable future. That is why we focus on reducing our own emissions whilst encouraging our customers, suppliers, and retail network to reduce their impact on the environment by recommending the use of more sustainable materials and processes. Across our markets, we've seen success in implementing measures that contribute positively to our planet and stakeholder value. For example, in the redesign of our office space in Austria, we achieved 61% energy savings by switching to LED lighting.



What are Allwyn's ESG priorities for the immediate future?

We are at the start of a big push to get ready to report against the EU's Corporate Sustainability Reporting Directive ("CSRD"), under which we will produce our first consolidated Group CSRD report in 2026, based on data collected in reporting year 2025. As outlined in this report, we have already completed our double materiality assessment. Based on this, we are working to develop ESG-related KPIs. Meanwhile, we are building a more sophisticated data-collection process and consolidation, which for the first time will include Scope 3 emissions.

Our unified Allwyn culture continues to evolve, preserving and building upon the distinct local identities and expertise of our markets. For example, we are working together to align our policy and training frameworks, and to provide more structured opportunities for our employees to gain experience across different markets. We are also prioritising diversity, equity, and inclusion, with a particular focus on ensuring more female representation throughout the Group. In 2024, we will activate an exciting new partnership with More than Equal, a charity that promotes gender diversity both in sport and in the workplace.

Robert Chvatal
Chief Executive Officer

Our progress at a glance

Highlights by pillar

Play

Prevention, Detection, Intervention

Defined key themes for our Group-wide Responsible Gaming KPIs.

➔ See page 22

Partner

Parent company-level partnership

Activated our partnership with Wings for Life World Run.

➔ See page 27

People

Redefined values

Redefined Allwyn's shared values with input from every market.

➔ See page 31

Planet

Towards SBTi

Started the process of setting a verified science-based target.

➔ See page 36

Governance, compliance, & risk management

Ready for CSRD

Pursued our CSRD Readiness Project.

➔ See page 16

Business highlights



Driving organic growth through product innovation

2023 was another year of new, engaging content and games for our players; for example, we launched a raft of new games in the exciting annuity category in Austria, the Czech Republic, and Greece and Cyprus.



Further expansion of the digital channel

Our strong online momentum continued, with the online share of gross gaming revenue ("GGR") higher year on year across all markets, and significant growth versus pre-COVID-19. In Greece and Cyprus, we launched a new iLottery proposition, bringing games such as KINO online alongside the existing Tzoker offering. At the same time, we continued to see the benefit of our focus on digitalising physical retail across geographies.



First step into the US market

We broadened our global presence, making our debut in the United States market through the acquisition in March 2023 of Allwyn LS Group (formerly Camelot LS Group), operator of the Illinois Lottery* under a private management agreement.



Preparation for next licence for the UK National Lottery

We mobilised resources to ensure a successful start to Allwyn UK's operation of the next 10-year licence to operate The National Lottery, in February 2024, including acquiring Camelot UK, the incumbent operator.

Financial achievements

Total Revenue

€7.9bn

Adjusted EBITDA

€1.5bn

Total Revenue growth

+98%

Adjusted EBITDA margin**

41%

Total Revenue growth in existing geographies

+6%

Online GGR share

36%

* The Illinois Lottery is operated by Allwyn Illinois LLC, a subsidiary of Allwyn North America Inc.

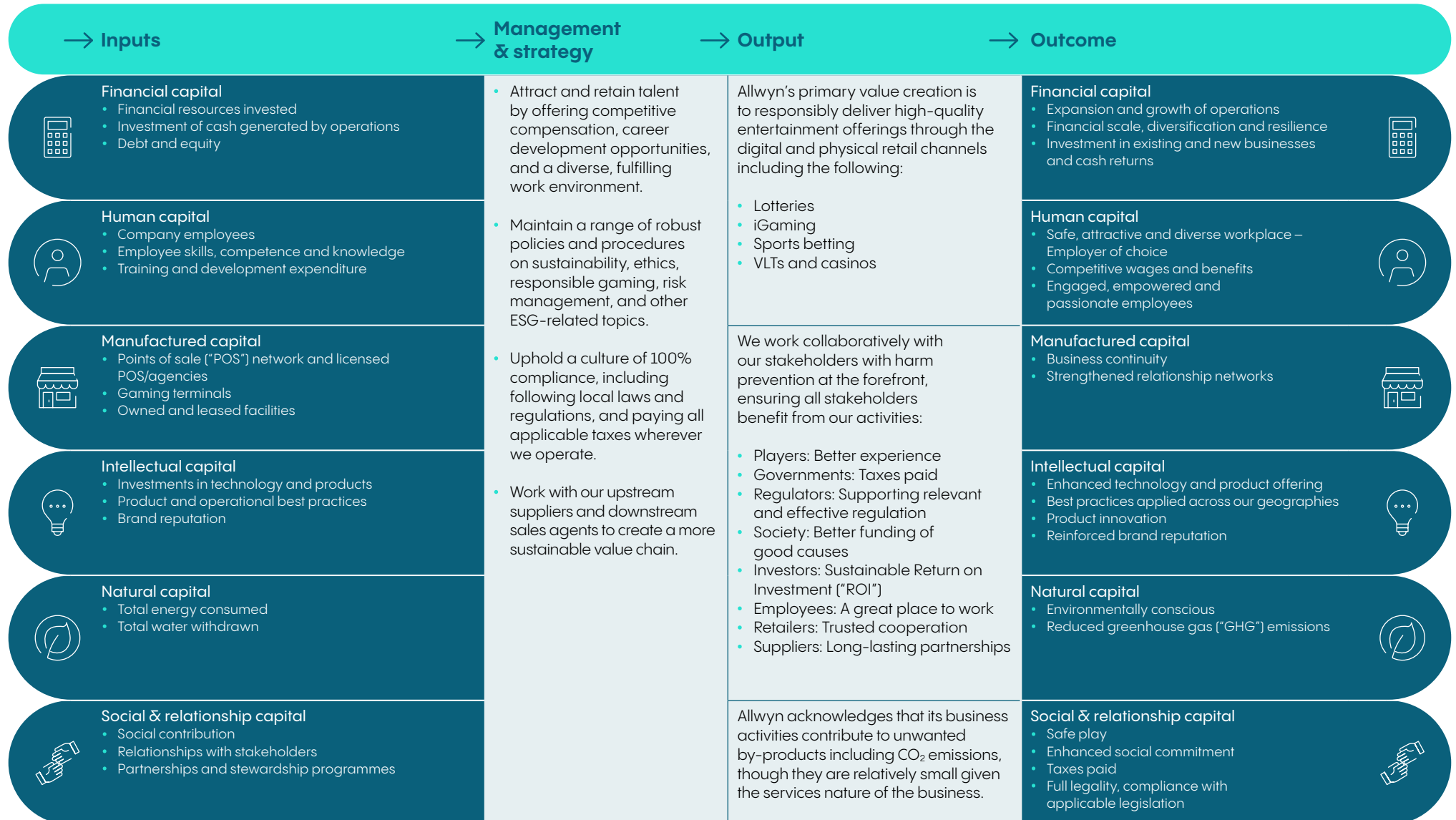
** % of Net Revenue.

Value chain

We are in the business of play. We operate lotteries and other games. As of 2023, customers can play either online or through any of our more than 100,000 physical points of sale (inclusive of Italy).

We run safe, innovative and high-quality games, relying on the know-how of our people, as well as technology and industry resources.

We seek to grow both organically and via strategic acquisitions and tenders.



Value chain in numbers

→ Our resources

→ Key inputs

→ Value created

→ Key outcomes



Financial capital

€2,446m

Net debt (incl. leases)

€859m

Total equity

€674m

Utilised for investment
(see page 20 of the
Annual report)

Human capital

7,670

Employees

€3.1m

Invested in employee
training courses

39%

Females in total
workforce

Manufactured capital

74k

Points of sale
(exclusive of Italy)

€369m

Property, plant
and equipment

Intellectual capital

Allwyn brand and
its local brands

Strong, highly recognisable brands

€2,431m

Intangible assets



Natural capital

34,687 MWh

Electricity consumption

1.3m litres

Vehicle fleet diesel and
gasoline consumption

Social & relationship capital

>47m

Active players

Financial capital

€7,878m

Total Revenue

€1,485m

Adjusted EBITDA

€520m

Profit after tax

€915m

Net cash from
operating activities

Human capital

>93k

Total hours of
training delivered

€514m

Employee wages
and benefits

Manufactured capital

€90m

Depreciation



Intellectual capital

€284m

Amortisation



Natural capital

14,607 tCO₂e

Total GHG emissions

10,193t

Total waste

6,329t

Waste recycled



Social & relationship capital

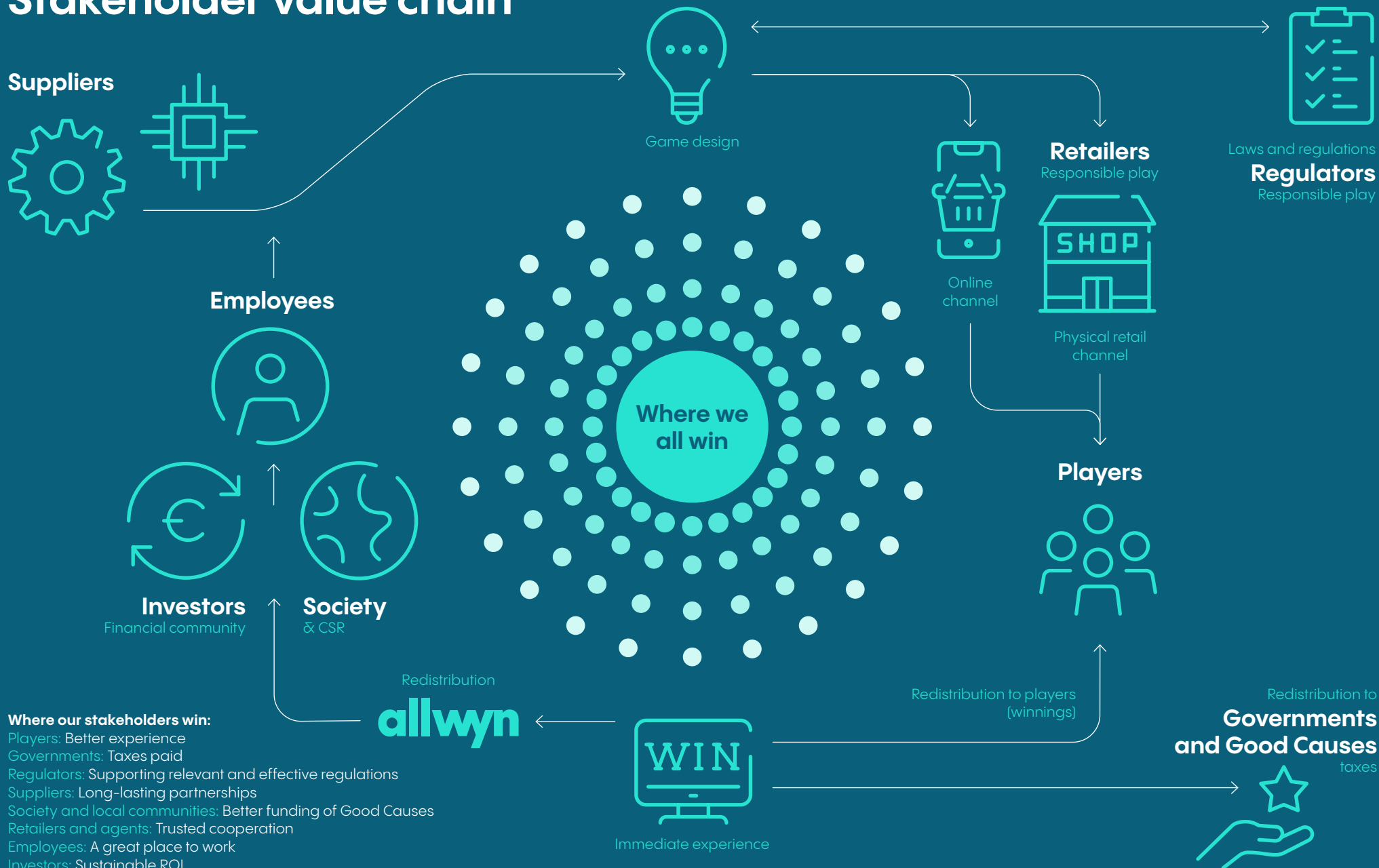
>€4,400m

Taxes paid and Good Causes

100%

Of markets we operate
in are regulated

Stakeholder value chain



Our markets



Austria

#1 Lottery, onshore iGaming and casino operator in Austria

Exclusive licences to operate lotteries, onshore iGaming and land-based casinos

Other gaming operations include sports betting and VLTs

>5,000 POS

Brands



Greece and Cyprus

#1 Lottery and sports betting operator in Greece and Cyprus

Exclusive licences to operate numerical lotteries, land-based sports betting, instant lotteries, and VLTs in Greece

Market leader in online sports betting and iGaming

Licence to operate lotteries in Cyprus and market leader in online sports betting

>12,000 POS

Brands



Czech Republic

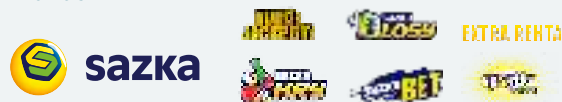
#1 Operator in the Czech Republic

Market leader for both numerical lotteries (94% market share and 100% market share in jackpot lotteries) and instant lotteries (86% market share)*

Other gaming operations include online sports betting and iGaming

>11,000 POS

Brands



Italy

#1 Numerical lottery operator in Italy

32.5% stake in LottItalia

Exclusive licence to operate fixed odds numerical lotteries

>34,000 POS

Brands



New markets in 2023



United Kingdom

#1 Lottery operator in the UK

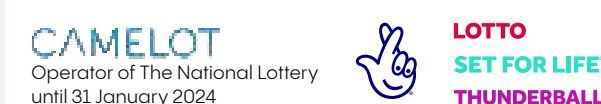
Exclusive licence to operate The National Lottery

Acquisition of Camelot UK, incumbent operator, in February 2023

Operations successfully transitioned to Allwyn UK, operator of the new licence for The National Lottery, on 1 February 2024

>40,000 POS

Brands



United States (Illinois)

#1 Lottery operator in Illinois, US

Operator of Illinois Lottery under a private management agreement

Follows acquisition of Allwyn LS Group (formerly Camelot LS Group) in March 2023

>6,000 POS

Brands



The number of POS is as at 31 December 2023.

* Market shares for the year ended 31 December 2022, according to H2GC.

Trends & world events

Cost of living crisis



About

The worldwide cost of living crisis continues, with many people having difficulty paying for necessities like rent, food, and energy.

Our response

When money is tight, lotteries remain an affordable form of entertainment, while also helping Good Causes. Players have historically continued to engage with lotteries, even in times of economic hardship.

Our responsibility is twofold. First, we must honour the trust people place in our lotteries, which we do by going above and beyond for player safety (Play). Second, we must continue to tackle social issues directly, which we do by continuing to ramp up our positive impact within communities (Partner).

Digital evolution



About

Across retail, the divide of digital vs. bricks-and-mortar is over. Today's consumers increasingly expect brands to span both channels, integrated in a seamless experience.

Our response

We take a digital-first approach, but that does not mean digital-only. Even as we innovate with online products, we continue to maintain our network of more than 74,000 physical points of sale (exclusive of Italy).

This comprehensive approach also extends to our ESG work. Whether campaigning for responsible gaming or highlighting the variety of Good Causes we support, we engage with the public both online and in person (Play & Partner). Behind the scenes, meanwhile, we continue to deploy the latest technology, including artificial intelligence, to ensure the highest standards of player safety (Play).

Purpose-led gaming



About

People increasingly want the brands they engage with to stand for more than just profits. Purposeful consumerism is especially powerful among members of Generation Z.

Our response

Lotteries, positioned at the intersection of entertainment and social impact, are well placed to meet the demand for purposeful gaming. We are working hard to increase our contributions to the community (Partner) and improve our environmental stewardship (Planet).

Our focus on purpose also extends to our employees. We strive to attract and support purpose-driven employees, and that means reflecting and honouring our shared values in everything we do (People).

➔ For more information on these trends and their effects on the lottery sector, please see our report *The Future of Lottery: A Game for Change*, available on our website.

Our sustainability journey



Timeline

2019

- Published first CSR Report.
- Put focus on activities supporting societies where Allwyn operates.
- Presented data sources on an individual operating market level.

2021

- Defined ESG strategy centred around four pillars.
- Established ESG framework applicable to the Group.
- Developed ESG roadmap.

2022

- Created Group-wide ESG Working Group.
- Deployed data collection framework to align with GRI reporting standards.
- Adopted Group Sustainability Policy.
- Established first set of ESG commitments.

2023

- Activated first Group-wide flagship social impact partnership.
- Appointed Chief People & Culture Officer.
- Began CSRD readiness project.
- Began CO₂ Scope 3 measurement initiative.

2024+

- Finalise materiality assessment.
- Define ESG-related KPIs.
- Set verified, science-based emissions target.

Reflections on progress in 2023

We remain committed to translating our ESG commitments into tangible, measurable outcomes and processes. In this report, we highlight many examples of progress. However, we also acknowledge the areas in which we need to elevate our performance:

- As promised in last year's ESG Report, we are working on our Group-wide Responsible Gaming Strategy. The Board is on track to approve the strategy by the end of 2024 (👉 see the Play pillar).
- Likewise, our Responsible Gaming Working Group is on track to produce Group-wide Responsible Gaming KPIs by the end of 2024 (👉 see the Play pillar).
- We focused on establishing partnerships while postponing the work on creating a formal process to calculate Allwyn's social impact (👉 see the Partner pillar).
- Instead of aiming to carry out a Group-wide employee engagement survey, as envisaged in our 2022 ESG Report, we are focusing on developing a unified approach towards more continuous employee engagement (👉 see the People pillar).
- We have yet to identify a flagship partner in the environmental realm capable of working across both Group functions and our markets, but this remains our ambition (👉 see the Planet pillar).

We look forward to pursuing further improvement in these and many other areas next year.

Materiality

During 2023, we updated our materiality assessment process from single to double materiality, building on the approach already in place from 2021. **This is a key element of our work to prepare for CSRD reporting.**

See page 20

What is a double materiality assessment?

A double materiality assessment ("DMA") considers two major factors:

- How we impact our surroundings, including our stakeholders.
- How the outside world impacts our business.

By assessing these two areas, we identify which aspects of sustainability to focus on to maximise our positive impact and minimise our negative impact.

Our materiality process

Guided by the European Sustainability Reporting Standards ("ESRS"), we used a five-step process to identify our material issues:

- Context analysis, looking at Allwyn's business model, value chain, and stakeholders; international ESG standards; the materiality matrices of leading peers in our sector; sector-specific guidance issued by trade associations; and reports and methodologies from ESG rating agencies.
- Identification of potentially material topics and sub-topics, with linked impacts, risks, and opportunities ("IROs") under each, based on activities present throughout the value chain.
- Quantitative and qualitative assessment of the foregoing IROs as they apply to Allwyn.
- Determination of material sustainability topics and sub-topics using an internally developed model to estimate materiality of associated IROs based on set thresholds.
- Oversight and validation of the results by cross-checking them with experts and managers.

How we engage stakeholders

Given the extensive nature of the ESRS assessment requirements, we decided to limit the number and groups of stakeholders involved in assessing our sustainability-related impacts and risks to internal and external subject-matter experts only.

In 2024, we plan to expand this by consulting a variety of external stakeholders, including among others, customers and regulators. In this way, we plan to verify that we have chosen the correct issues to focus on.

A major purpose of the 2023 DMA was to identify actual and potential negative and positive impacts Allwyn has on people and the environment.

The results of the DMA were consolidated and mapped to applicable sustainability topics, referencing ESRS. This resulted in the following material topics and related sustainability matters:

Climate change

- Climate change mitigation
- Energy

Resource use and circular economy

- Resource inflows, including resource use
- Waste

Own workforce

- Working conditions of own workers
- Equal treatment and opportunities of own workers
- Other work-related rights (Privacy)

Consumers and end-users / Responsible gaming

- Information-related impacts for consumers and/or end-users (Privacy, Access to (quality) information)
- Personal safety of consumers and/or end-users (Health and safety, Security of a person, Protection of children)
- Social inclusion of consumers and/or end-users (Responsible marketing practices)

Business conduct

- Corporate culture
- Protection of whistleblowers
- Management of relationships with suppliers, including payment practices
- Corruption and bribery
- Anti-money laundering
- Cybersecurity

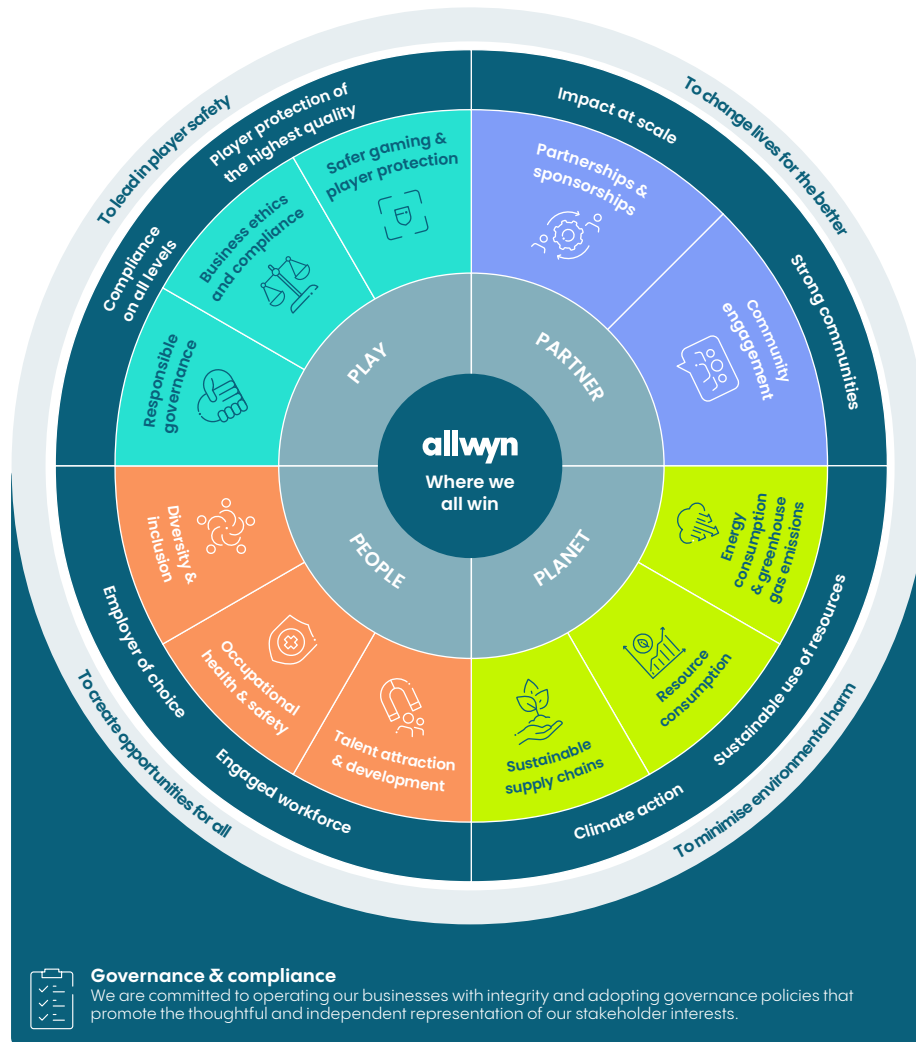
Social investments

- Contribution to Good Causes, tax paid, and CSR spending



Materiality continued

A closer look at our material issues



Material issues

ESG linkage

Consumers and end-users / Responsible gaming

Protecting consumer health and safety by embedding responsible gaming practices in our everyday operations to minimise risks and ensure appropriate behaviour towards players.



Safer gaming & player protection

Business conduct

Fostering sustainable and responsible corporate behaviour, acting with integrity and transparency in political involvement, and avoiding corruption in all its forms, including bribery, fraud, and money laundering.

Safeguarding the privacy of customer data and the resilience of our networks against cyberattacks.

Promoting responsible and sustainable sourcing, including environmental and social matters such as protection of the environment and human rights.



Responsible governance



Business ethics & compliance



Governance & compliance



Sustainable supply chains

Climate change

Reducing our impact on the environment by lowering greenhouse gas emissions and the release of other harmful substances into the atmosphere.



Energy consumption & greenhouse gas emissions

Resource use and circular economy

Reducing environmental impact by responsibly managing input materials such as paper. Reducing waste generated by our operations as well as supporting the circular economy by recycling waste generated where possible.



Resource consumption

Social investments

Contributing to the public good by providing funds to support cultural, educational, and health activities in cooperation with various stakeholders.



Partnerships & sponsorship



Community engagement

Own workforce

Ensuring an equitable, diverse, inclusive, and non-discriminatory working environment; safeguarding the health, safety, and well-being of our employees; and promoting collaborative social dialogue.



Diversity & inclusion



Occupational health & safety



Talent attraction & development

ESG strategy at a glance

We are committed to being a responsible business. We want to do the right thing for our customers, our community, our employees, and the environment. Our ESG strategy helps us to structure our efforts and track our progress.

Set out according to the tenets and pillars of our ESG strategy, this report contains information on the progress we made and the activities we conducted in 2023, as well as our plans and aspirations for 2024 and beyond.

Taking guidance from the UN SDGs

In 2015, the member states of the United Nations unanimously adopted the Sustainable Development Goals ("SDGs") with the linked aims of eradicating poverty, protecting the planet, and improving the lives of all people.

The 17 SDGs cover various topics, from gender equality to ocean stewardship.

Not every goal is relevant to every organisation, and companies usually choose to focus on a limited number against which they can make the greatest impact.

With that in mind, we have chosen the following as guiding principles.



Working toward a better gender balance at all levels of the organisation.

Promoting gender balance beyond our organisation.

Tackling discrimination in all its forms.



Being a living wage employer.



Ensuring responsible procurement.



Measuring Scope 1 and 2 emissions.

Beginning to measure and report on Scope 3 emissions.



Engaging with governments on regulation of the gaming industry.

Driving increased support for Good Causes, directly and through our lotteries.



Case study:

Our partnerships: balancing global strategy with local insights and expertise



When it comes to social impact, Allwyn is well positioned to take a global view – as we have done, for example, by forming a partnership with Wings for Life World Run (page 28). At the local level, however, our markets lead the way.

Our Group ESG strategy was developed at the same time as we were working on our social value strategy for the next UK National Lottery licence period which runs from 2024 to 2034. Through close coordination, we were able to ensure that the local strategy follows the Group strategy, while leaving room to fine-tune local emphasis where appropriate.

Thanks to its relationships with thousands of National Lottery partners and retailers, our UK market enjoys considerable reach in communities and high streets up and down the country. To take full advantage of this reach, the UK team designed a strategy called Prosperous Places, focusing on local communities. All initiatives under Prosperous Places are funded with Allwyn UK's own money, via a ringfenced Social Value Fund of £1 million per year. This will last throughout the term of this next National Lottery licence.

With its local focus, our UK market will be able to go places the Group can't reach: a perfect example of the right balance between coordination and flexibility.

ESG strategy

	Ambition	Mission	Commitments and targets as set out in 2022	Progress
Play ➔ See page 22	To lead in player safety	To measure and increase engagement with our players to help us minimise player harm whilst supporting responsible gaming.	Establish a Group Responsible Gaming Strategy by the end of 2024.	On track
Partner ➔ See page 27	To change lives for the better	To proactively engage with stakeholders to deliver positive impact where we operate.	Establish a structured employee volunteering programme by the end of 2024. Define a formal process for calculating social impact by the end of 2024.	In progress
People ➔ See page 31	To create opportunities for all	To invest in people who make our success possible and to create and foster an environment where individuals are celebrated and feel valued.	Conduct a Group-wide employee engagement survey and define areas for improving engagement.	In progress
Planet ➔ See page 36	To minimise environmental impact	To further improve environmental performance and report results and initiatives annually.	By the end of 2023, Allwyn will submit its commitment letter to the SBTi, beginning the process of establishing a science-based target. As an interim stage, Allwyn will commit to reduce Scope 1 and Scope 2 emissions by 30% by 2030. This target will be superseded by Allwyn's science-based target once it is validated by the SBTi.	On track
Governance & compliance ➔ See page 16	We are committed to operating our businesses with integrity and adopting governance policies that promote the thoughtful and independent representation of our stakeholder interests. • Prioritising the integrity of compliance processes and procedures. • Designing systems, policies, and procedures to hold our organisation and activities to the highest standards. • Ensuring that each of our markets has relevant units and departments to ensure compliance with applicable legislation and regulations.			

Governance, compliance & risk management

Introduction

High standards of governance, compliance, and risk management underpin everything we do, including all four pillars set out in this report. Wherever we operate, we do so on the basis of strict compliance with all applicable laws, regulations, and standards. This culture of compliance forms the foundation for our ESG efforts.



Our ESG governance framework

Board oversight

Ultimate accountability for all matters of governance lies with the Board. The Board is updated about all important developments in the Group at quarterly meetings. In 2023, the Board received performance, compliance, and regulatory updates from relevant executives. It approved a set of updates to internal policies, including sustainability and risk management. In addition, in 2023 the Board received updates on Allwyn's ESG activities, including recommended short- and long-term targets under each of the four strategic pillars (see page 15).

On a day-to-day basis, the Board of Directors delegates responsibility for managing Allwyn's impacts on the economy, environment, communities, and people to management.

At the same time, we strive to allow each market to keep its distinct identity and local expertise. Therefore, while we guide and support our markets toward maintaining the highest levels of governance and compliance, we also ensure that each retains flexibility in its operations.

Governance framework



Integrating ESG into our strategic planning

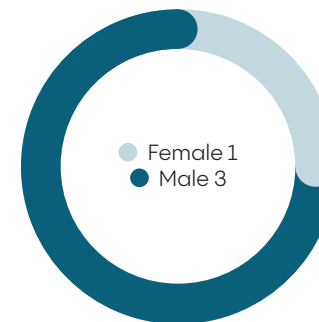
Allwyn's governance framework is driven by our mission of achieving competitive and responsible growth while taking into account the welfare of our stakeholders. The cornerstones of Allwyn's approach to governance are ethical conduct, compliance, risk management, and stakeholder engagement. We strive to achieve responsible growth, while ensuring the interests of all of our stakeholders are considered as part of our decision-making.

Sustainable development forms an integral part of our strategic plan, which we monitor on a continuous basis.

The compliance and risk management Group functions each independently report to the Audit Committee on governance, compliance, and risk management matters, all of which include ESG issues. This fosters transparency and allows for the identification and mitigation of potential issues.

➔ Please see page 40 of the Annual Report for more information on the Audit Committee.

Board gender diversity



Governance, compliance & risk management continued

Our policy framework

All policies applicable to Group functions are reviewed and approved by the Board.

Our Code of Conduct is the foundation for embedding our values across the organisation and ensuring that we operate with the highest standards of compliance. It includes duties and requirements relating to legal compliance, whistleblowing, and transparency. Compliance with it is obligatory for all individuals associated with Allwyn.

While the policy framework of the Group represents the overall approach, each of Allwyn's markets also has its own set of policies in place. These are aligned with the guiding principles embodied in the Code of Conduct and tailored to relevant local requirements.

Our Group Sustainability Policy sets out how Allwyn's ESG efforts are governed, who is responsible for them, and who holds accountability.

Case study:

Enhancing our Code of Conduct

Allwyn's Code of Conduct is the entry point for employees and other stakeholders to familiarise themselves with our robust policy framework, including compliance. We seek to ensure that our employees understand the Code of Conduct and apply it consistently. For example, employees undergo mandatory compliance training at onboarding and annually thereafter. Non-compliance can lead to disciplinary measures, including termination of employment, and might also involve civil, regulatory, and criminal consequences. On an annual basis the Group policy framework undergoes review and, in 2023, we undertook a comprehensive review of the Code of Conduct to ensure that it reflects and communicates Allwyn's values; that it includes clear cross-references to other relevant policies; and that its principles are being applied and adapted effectively in all markets.

The Board adopted the updated Code of Conduct in Q4 2023. We subsequently shared it with our markets, instructing each one to check that its own code of conduct and policies are aligned with the Group's framework by Q2 2024.

➔ Please find a copy of our updated Code of Conduct on our website.

Other policies are not publicly available, but are published prominently on our intranet.

In addition to the Code of Conduct, Allwyn has adopted a range of key policies related to ESG, including the following:

- A Sustainability Policy, covering all aspects of the four pillars set out in this report (see the ESG strategy on page 15).
- A Responsible Gaming Policy (see the Play pillar on page 22).
- A Risk Management Policy, which incorporates ESG-related risks into our Risk Management Framework (see the section How we manage risk on page 18).
- A Whistleblowing Policy, demonstrating how disclosures of malpractice or wrongdoing can be reported at Allwyn Group level by internal as well as external stakeholders of the wider Group (see the How we manage compliance section on page 19).
- A Grievance Policy, under which employees are encouraged to report problems either to their line manager or to the People and Culture department.

Each of our markets has its own policies and procedures, tailored to ensure full compliance with local licensing, regulatory, and other legal obligations. We require senior management in each market to:

- Adopt policies aligned with the Group's policy framework, including Sustainability, Responsible Gaming, Risk Management, Compliance, Anti-bribery and corruption, and other relevant policies, augmented where necessary to comply with local laws;
- Adopt additional policies as necessary to comply with local laws and regulations; and

- Instil a culture of compliance throughout the organisation.

Our compliance and regulatory affairs department reviews the following policy frameworks annually across all markets to ensure alignment with our Group policies:

- Code of Conduct;
- Anti-money Laundering & Counter-terrorist Financing Policy;
- Anti-bribery and Corruption Policy;
- Gifts, Hospitality, and Donations Policy;
- Conflict of Interest Policy;
- Competition Policy;
- Insider Trading Policy;
- Whistleblowing Policy;
- Sustainability Policy; and
- Risk Management Policy.

If changes are required to align any given policy to Group standards, the relevant market is given appropriate deadlines.

Allwyn has developed and adopted a six-step compliance programme as a mechanism to ensure and track the effectiveness of its compliance efforts. The programme inspires a culture of compliance which is led from the top; has risk-based decision-making and strong policy, control, and training frameworks at its core; and is continuously reviewed, evaluated, improved, and enforced to ensure effectiveness today and in the future. The programme underscores our commitment to strong compliance practices. This includes annual reporting by operating companies and a structured feedback mechanism, ensuring continuous improvement.

Governance, compliance & risk management continued

How we manage risk

At Allwyn, we have made risk management a fundamental part of management at all levels. By observing, anticipating, managing, and responding to risks, we become better able to fulfil our ESG responsibilities and safeguard the interests of all our stakeholders.

Our approach centres on our Risk Management Framework, which is designed to identify, document, monitor, and manage risks at Allwyn International and across Group functions, as well as at market level.

Allwyn's Risk Management Framework is embedded throughout the Group via a simultaneous top-down and bottom-up approach.

The Group Risk Management Function meets biweekly with the heads of risk of each market. This ensures that risk management practices are effectively cascaded down, feedback is given appropriately as needed, and escalations are managed in line with the organisation's risk appetite and tolerance metrics.

Our Risk Management Function has created a Risk Taxonomy, which assists with the systematic definition, classification, measurement, and understanding of the types of risks we face or may face in the future across the Group.



Risk categories relevant to this report include:

- Cyber & Information security;
- Employment practices;
- ESG;
- Financial risk, including tax risk
- People;
- Regulatory & compliance;
- Responsible gaming; and
- Work and safety.

➔ Details of the various ESG-related risks we have identified and the measures we have taken to mitigate them can be found under each pillar of this report. For more information on our risk factors, please see the Annual Report, pages 43-48.

The Board sets policies and the overall business and risk strategy, and calibrates our level of risk appetite and tolerance.

The Audit Committee provides oversight.

The Group Risk Management Function monitors risks day-to-day, facilitates risk management processes, and reports regularly to the Executive management team and the Board.

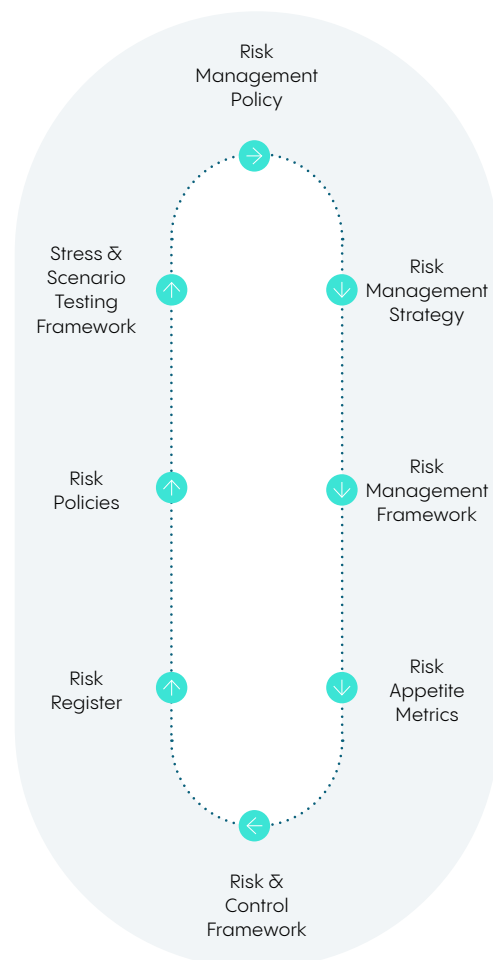
Risk appetites and tolerances determined within Group functions are translated and calibrated into a range of risk metrics and limits, which are regularly monitored on an aggregate level.

Risk reporting from our markets feeds into a continuous process of review, challenge, and oversight within Group functions.

Governance, compliance & risk management continued

Our Risk Management Framework

The Risk Management Framework articulated in the Risk Management Policy comprises a range of core elements that collectively ensure that the risks Allwyn is exposed to are effectively identified, measured, assessed, managed, and reported upon.



How we manage compliance

We are committed to operating our businesses with integrity. We have designed and implemented our compliance processes and procedures to strive to uphold the highest standards. We require each of our markets to have appropriate functions tasked with ensuring compliance with all relevant legislation, regulation, and codes of practice.

Our compliance programme at Allwyn includes several key elements to ensure its effectiveness:

- Written policies, procedures, and standards.
- A supervision programme to oversee, monitor, and enforce the compliance framework on a day-to-day basis.
- Employee training and education to ensure that employees at every level of the organisation understand and can comply with our approach, expectations, and standards. Our training programme includes onboarding training as well as annual refreshers which serve to remind all employees of the framework.
- Two-way, proactive communication. All employees of Allwyn may safely report compliance issues or fraudulent or illegal behaviour without fear of retaliation.
- Internal and external monitoring and auditing systems to ensure the effectiveness of our compliance programme and identification of risks. When we identify vulnerabilities or violations through monitoring and auditing, we take timely, consistent action.
- All employees are required to follow the programme. Moreover, we encourage, protect, and value reporting of concerns or suspected wrongdoing.



"As an independent member of Allwyn's Audit Committee, I emphasise the paramount importance of good governance in the Company. I am pleased to report that Allwyn has made substantial progress in these areas, reflecting the Group's commitment to operational excellence and transparency. As a result, Allwyn enjoys an enhanced capability to manage risks effectively and align its strategies with stakeholder expectations. I remain confident in the Company's trajectory and believe that the continued focus on enhancing governance frameworks will drive Allwyn's development and long-term value creation."

Roland Ruprecht
Chairman of the Audit Committee

Governance, compliance & risk management continued

Our progress in 2023

An update on CSRD readiness from the ESG Working Group

Beginning in 2026, Allwyn intends to report against the standards set by the European Union's CSRD. This means that we will need to start collecting relevant data from across the Group in 2025.

Our preparations for CSRD are well underway. We have conducted a materiality assessment, as described on page 12. Building on this work, we are in the process of defining Group-wide KPIs linked to each of our material issues; creating a robust, unified data collection process; and identifying software tools to help us carry out the exercise.

With the progress we have made so far and additional efforts proceeding apace, we are confident that we will be ready to comply with CSRD.

As Allwyn continues to grow and onboard new markets, we must be especially vigilant to maintain high standards of governance, compliance, and risk management throughout the organisation.

➔ In 2023, we enhanced our focus on aligning policies and procedures across existing and newly acquired markets, including the revised Group Code of Conduct and supporting policies described on page 17.

In parallel, we took steps to enhance monitoring and enforcement of our policies:

- We more than doubled the size of the compliance team within our Group functions, recruiting industry professionals with specialised knowledge of their designated areas of oversight. We also restructured the compliance team, creating formal divisions based on expertise. These enhancements will allow us not just to respond to existing compliance needs but to anticipate future needs and address them adequately and proactively. They will also help to increase coordination across the Group.
- We presented our markets with a revised compliance reporting framework, based on bi-monthly meetings and requiring annual reports to the Group on various aspects, including licensing status; anti-money laundering; fraud, corruption, and bribery; whistleblowing; complaints; litigation and sanctions; training programmes; and policies and operational procedures. This framework will provide the Group with enhanced insights into operations and events at market level.

- We continued to improve our whistleblower protections by implementing a new independent whistleblower hotline service. The new service is provided by WhistleB. All reports made via the new publicly accessible digital portal are 100% anonymous, encrypted, and password protected. Alongside the new service, we provided staff with specialist training on how to use it. The whistleblower hotline service can be accessed online.

- We appointed our first designated data protection officer. For more details, see the case study to the right.

- We introduced a revised training framework, including new trainings on topics including compliance, data protection, insider trading, money laundering, and whistleblowing.

We continued to enhance our approach to risk management:

- We deployed the core elements of our Risk Management Framework, embedding them throughout the Group.
- In line with our Risk Strategy, we introduced risk appetite statements and metrics. We measured and monitored these throughout the year.
- Markets began to report their local risk assessments, risk registers, and datapoints to the Group Risk Management Function, which are subsequently consolidated.

Case study:

Putting the right emphasis on data protection

With operations in multiple jurisdictions, Allwyn must adhere to a variety of data protection regulations, such as the General Data Protection Regulation ("GDPR"), the EU-US Data Privacy Framework, and others. Each market has in place its own data protection policies and practices fitting its local rules, culture, and operations.

Appointed in 2023, our Group Data Protection Officer ("DPO") is working with each of our markets to establish an overall strategy and oversee our data governance frameworks. The DPO collaborates with internal and external stakeholders to ensure that data is collected, processed, and stored in a secure and compliant manner. On Group strategic projects, the DPO will be an integral member of the project team, helping to ensure that our projects are designed with data protection and privacy in mind.

Going forward, the Group DPO's priorities will include developing an overarching data protection framework and fostering a data protection culture Group-wide, including through training and enhanced communication.

Governance, compliance & risk management continued



Q&A:

Why is your role important to Allwyn?

My role places me at the heart of our organisation's compliance, risk management, and governance strategies. For Allwyn, compliance is more than just a set of rules to follow. It's the foundation upon which we build our business practices. It guides our decision-making, shapes our corporate culture, and ensures that we operate not only within the bounds of legal and regulatory requirements but also in alignment with our ethical standards and commitments to our stakeholders.

How would you rate Allwyn's overall effectiveness in governance, compliance and risk management?

I would confidently rate our performance as high. We have established a robust framework covering several critical areas:

- A strong control environment across all levels of the organisation.
- Active collaboration between Group functions and the markets, leveraging local insights and expertise.
- An emphasis on giving decision-makers insight into all operations, facilitating a culture of trust and accountability.
- Clear reporting lines, supporting effective communication, prompt decision-making, and a streamlined approach to managing compliance and risk.

Are you satisfied with Allwyn's progress in 2023?

Yes. Coming from an already high baseline, in 2023 we further enhanced our governance, compliance, and risk management practices, helping to maintain the highest standards in these critical areas.

Challenges we face

As Allwyn continues to grow and embed new markets into our unified culture, the main lesson we learned in 2023 is the vital importance of creating alignment whilst at the same time learning from, and leveraging the best practices of, individual markets.

Looking ahead

Given the significance of governance, compliance, and risk management, we plan to enhance our approach still further in 2024 and beyond. These plans include the following:

- In 2024, we have already added to our compliance reporting framework a requirement that each market complete an annual questionnaire on data protection.
- Having updated our Group training framework, we will go on to examine the training frameworks being offered at market level to ensure that they meet Group standards.
- Meanwhile, we are working to prepare a standard approach to onboarding new employees across the Group.

Case study:

Enhancing our training programme

At Allwyn, we are working to instill a culture of compliance throughout the Group. A key way of doing this is through training. In 2023, we undertook a comprehensive assessment of our training programmes.

Our newly restructured Compliance Department took the lead in revising the programme. Within our Group functions, we established requirements for onboarding and refresher training on our Code of Conduct and full policy framework, including specialised training on topics ranging from anti-money laundering to data protection and information security. In parallel, we worked closely with each market to analyse their existing training programmes and align them to the approach used across Group functions.

As Allwyn grows and its operations become more complex, these enhancements will play a pivotal role in cementing a strong culture of compliance. By educating and engaging our entire workforce in best practices, we will foster a more robust, informed, unified, and organisational environment.

Play



"Player safety is our top priority. Wherever we operate, we comply strictly with all applicable laws, regulations, and standards designed to ensure safe play. But that is only the beginning of our commitment. It is Allwyn's ambition to set the standard for player safety around the world, and to ensure that entertainment goes hand in hand with protection."

Jan Matuska,
Chief of Staff & Strategy

In 2023, teams across Allwyn worked hard to promote responsible gaming in all aspects of our business. Within Group functions, we established three major themes which will form the foundation of our responsible gaming KPIs. I look forward to driving these and other initiatives forward throughout 2024 and beyond.

As our track record shows, we go above and beyond strict legal requirements. Among a host of activities, we build public awareness, collaborate with researchers and safe-gaming campaigners, use artificial intelligence to detect and address problem play, and deploy mystery shoppers to monitor our retail network. On the pages that follow, we detail some highlights from this work.

Our approach and impact

Our activities and their impact

Gaming in moderation provides light-hearted entertainment for millions of people around the world. Gaming in excess, however, can result in financial hardship for players and their families. By protecting players, we help to avoid or mitigate these harms.

Our policies and commitments

The Board is committed to ensuring that Allwyn operates safely for all players, with fair rules and procedures for each game and appropriate measures in place to prevent underage and problem play.

Our Group Sustainability Policy expresses our commitment to the highest possible standards of responsible play. Our Group Responsible Gaming Policy elaborates on this commitment. Together, these policies set the standard for the entire Group. In turn, we require each of our markets to have its own policies and procedures in place, aligned with both local laws and our Group policies.

In our ESG Report for 2022, we committed to bolstering our efforts in this area by establishing a new Group Responsible Gaming Strategy. We remain on track to have the new strategy approved by the end of 2024.



Our Play commitment

Establish a Group Responsible Gaming Strategy by the end of 2024.

How we manage our impact

Our goal is to grow the number of people playing a little and responsibly.

Our lotteries operate under the EL or WLA responsible gaming standards. All our markets that operate lotteries have a Level 4 Responsible Gaming Certification*, the highest level issued by the WLA.

The requirements for this certification are stringent and include external assurance by an independent assessor.

* In our Greek market, which covers both Greece and Cyprus, only the Greek operating entity is certified at this level.

We incorporate responsible gaming principles at every stage in the lifecycle of each product, from game design to marketing to continuous monitoring of our operations. For example:

- In game design, we build in tools for time-outs, deposit limits, and self-exclusion wherever operationally or legally possible.
- In both design and marketing, we take care to eliminate any visual, sound, verbal, or written elements that would attract particular attention from minors.

In this way, we strive to screen out any feature that might open the door to underage or unsafe play.

We aim to make information about responsible play available to all players, allowing people to make informed decisions about participation in our games. We include promotion of responsible play in our contracts with retailers. Across retail, online, and physical venues, we train our teams and agents to raise awareness of safe-play principles, recognise at-risk customers, and intervene in a timely fashion to prevent or mitigate harm.

We use the latest technology, including artificial intelligence, to detect signs of problem play and trigger intervention, if possible, before harm can take place. For examples, see page 25.

Finally, we have an additional advantage that is unusual in the lottery sector. Our multi-national scale allows us to pool best practice from across our markets and adopt the policies, processes, and strategies that work best.

Play continued

How we track our effectiveness

As we continue to expand into new markets, our progress towards unifying standards across the Group has been slower than originally planned (see 'Challenges we face' on page 26). However, we have now established a Group framework for KPIs related to responsible gaming. We aim to finalise these KPIs and roll them out Group-wide by the end of 2024.

How we engage stakeholders

We engage stakeholders in our responsible gaming activities wherever possible. This is one of the key principles underpinning our Group Responsible Gaming Policy.

We partner with charities and organisations across research, prevention, and treatment to understand the risks involved in gaming, raise awareness, and support positive new developments. This includes engaging with academics and experts in responsible gaming, to understand where improvements can be made to our approach.

We work with the industry and regulators, including national governments and international lottery organisations such as the WLA and EL, to contribute to the development and strengthening of responsible gaming laws everywhere we operate.

We engage the public by holding events and using advertising and information campaigns. ➔ For examples, see our case studies on page 26.



Case study:

Supporting Hispanic/Latinx players in the US



In March 2022, the Illinois state government published a state-wide assessment of gaming. One of the assessment's headline conclusions was that problem gaming disproportionately affects marginalised communities. This was especially true of the Hispanic/Latinx community. Among frequent gamblers (defined as those who participated in games at least monthly), around one quarter (25.9%) of Hispanic/Latinx players had a gambling problem, with a comparison to an overall average instead of White players.

In January 2023, our North American market sponsored the Illinois Council on Problem Gambling's First Annual Hispanic/Latinx Conference on Problem Gambling. The event helped to shed light on the community's

specific challenges and initiated a conversation on effective strategies for prevention and support.

Our North American market also translated into Spanish its Responsible Gaming Guide, a safer-gaming brochure available at retail locations across the state. The first print run of 25,000 copies was targeted to locations with high concentrations of Spanish-speaking players.

With these actions, our North American market increased awareness of the issues and of best practice, among both industry professionals and Hispanic/Latinx players. The North American team intends to continue both endeavours in the future.

Managing the risk

Risk

Underage or otherwise unsafe play poses dangers to players, minors, vulnerable groups, families, and society at large. Any deficiencies in Allwyn's approach to responsible gaming might exacerbate these risks.

Failure to comply with applicable laws, regulations, and standards could result in exposure to legal, regulatory, and reputational liabilities.

Mitigation

- Rigorous policies on responsible gaming, including guidelines on product design, customer interaction, marketing, and advertising.
- Monitoring and intervention procedures backed by data analysis and AI tools.
- Partnerships with leading organisations providing research, prevention, and treatment.

- A strong culture of compliance, supported by comprehensive training and open, continuous engagement with external stakeholders.
- Responsible design, marketing, and operation of all products.

Play continued

Our progress in 2023

Our Responsible Gaming Working Group, created to foster communication between markets, met monthly in 2023. The Working Group also successfully integrated colleagues from Allwyn's new markets, enhancing our ability to share best practice and define Group-wide standards.

Among its most important achievements in 2023, the Working Group outlined Group-wide Responsible Gaming KPIs, organised around three principles: **Prevention, Detection, and Intervention** which will form the foundation of the Group-wide Responsible Gaming Strategy.



Prevention

Across all markets, preventing underage and problem gambling is central to our approach. We exercise zero-tolerance toward underage gaming, and we tackle this challenge with a combination of employee training and mystery shopping. We also pursue awareness-raising initiatives like our affiliate marketing project in Greece (see case study). Going forward, we will track the scale and effectiveness of these initiatives within our Group functions, share best practice across our markets, and make any improvements necessary to achieve maximum player protection.

Case study:

Raising awareness through affiliate marketing



Like many businesses these days, our Greek market uses affiliate marketing to reach audiences interested in sport and gaming. In 2023, it became the first company in Europe to use these same channels to spread the word about safe play.

Urging players not to "drop the ball" when it comes to responsible gaming, the campaign aims to raise awareness of the issues and to direct players toward a website featuring resources including a self-assessment quiz to identify potentially problematic habits. Alongside this, the Greek market held a workshop in which 50 of its top marketing affiliates learned about cutting-edge responsible gaming practices and how they can help ensure safer play for all.

The campaign reached around 600,000 people, almost 5,000 of whom paid a visit to the website. In recognition of these efforts, the team behind the campaign won the Innovation in Responsible Gaming award at the EGR Marketing & Innovation Awards.



Detection

By detecting the warning signs of problem play early, we see not only any harm that has already occurred but any further harm that may develop in the future. The many detection mechanisms in place across our markets range from highly trained staff to sophisticated AI modelling. Our forthcoming KPIs will encourage constant improvement by measuring the speed and accuracy of problem-play detection across the Group.

Case study:

Continual learning in approaches to detection



Employee training is a process of continual learning and development. Our Austrian market delivers specialised training to all managers and customer-facing staff through tailored sessions and interactive workshops conducted by experts in responsible gaming.

To support this continual learning process, employees are immersed in the latest developments in player protection at the annual Playsponsible Academy. With over 200 attendees from across our Austrian market, the 2023 agenda focused on various aspects of responsible gaming, including state-of-the-art research into the relationship between problem gambling and brain science.

Going above and beyond to educate employees in this way instils a culture of responsible gaming by allowing staff to generate their own ideas on how they engage with customers.



Play continued



Intervention

Armed with data from our detection mechanisms, we tailor our interventions to the needs of each player. These range from sharing responsible gaming messaging to, in the most serious cases, signposting customers to treatment, support, or self-exclusion schemes. Through KPIs that track the mix of interventions used and the player behaviour that follows, we will continue to make improvements to ensure that players receive the interventions best suited to their needs.



Case study:

Healthy play communications



In the UK, we send communications to all players promoting healthy play and provide more targeted interventions where customers are identified as at-risk.

In 2023, we sent around 5.5 million emails every quarter to digital players sharing information on healthy play. In addition to this, we made 36,737 outbound healthy play phone calls to players to address their play behaviour and encourage healthy play.

To ensure that players can access the support they need, the UK market has also introduced a call transfer service to GamCare, the leading national provider of free information, advice, and support for anyone affected by problem gambling.

“Having analysed the results of the interventions programme, I can see that they are effective at changing player behaviour. It is great to see how committed the UK team is to taking such a systematic, long-term approach aiming at continuous improvement of its consumer-centric interventions.”

Dr Zoe Theocharis,

Mindframe on the UK National Lottery
Leading behavioural psychologist

Each of our markets has deep experience and an exemplary track record in ensuring responsible gaming. While ensuring greater coordination and information-sharing across the Group, we are also continuing a number of programmes at market level. Below, we highlight some of these successes.

For example:

- Our markets held Responsible Gaming Days to promote the principles of safer play to a broad audience. In Greece, for example, some 45 such events took place at stores, sports events, concerts, and other settings. A total of 34,920 attendees completed a responsible gaming-themed “mini-quiz” designed to raise their awareness.
- Allwyn Lottery Solutions, part of Allwyn LS Group, continued to enhance its approach to safer game design, evolving its Game Design Principles to ensure that games do not encourage underage play and protect the interest of all players. This includes risk-assessing products before their release.
- Allwyn Lottery Solutions successfully achieved recertification to the WLA Responsible Gaming Standards for Associate Members.
- Our Austrian market voluntarily increased the minimum age for playing its lotteries from 16 to 18. At the same time, it also voluntarily tightened its limits on player deposits and introduced even stricter limits for players aged 18 to 25, who, according to research, are at greater risk of problem gambling. In both cases, these new restrictions extend beyond the legal requirements in Austria, underlining our focus on responsible gaming and, in particular, on protecting minors and younger players.

AI and problematic play

Several markets continued to develop their use of artificial intelligence to detect and address signs of problematic play. Whenever we use AI, we take care to do so in an ethical manner that protects personal and other confidential data:

- In Greece, work continued to improve the accuracy of the Safety Net Algorithm, which proactively identifies problematic behaviour among online customers. Following these improvements, customers flagged as high-risk were 3.5 times more likely to self-exclude. Following the success of the Safety Net Algorithm online, the Greek market is now using AI to develop a prediction model to minimise excessive play among VLT players.
- Our Austrian market continues to expand its use of the safer-play tool Mentor. In 2023, our Austria team decided to make the tool mandatory for all customers. In so doing, it realised a substantial increase in the number of customers opening Mentor messages.
- Inspired by the success of its Austrian colleagues, our Czech market has also rolled out the Mentor tool. It uses Mentor in tandem with its own sophisticated AI player-protection tool, which provides an additional level of insight in understanding customer risk product by product. Beyond this, it has considered the impact of different interventions on high-risk customers and their behaviour thereafter.

Play continued



Case study:

Gambling is not child's play



One of our top priorities is to prevent underage play. Studies demonstrate that the younger a person is when they start gaming, the more likely they are to experience gaming-related stress later in life. For this reason, we have made the minimum age for all our products 18, even in places where local law allows a lower age limit. We also have special protections in place for players aged 18 to 25.

To bolster these efforts, our Austrian market participated in "Gambling Is Not Child's Play", an international campaign designed to underline the point that gaming products are not for children or adolescents. The campaign

intensified in the run-up to Christmas under the tagline "Gift Responsibly", reminding people that our products are not suitable gifts for anyone under 18.

Our US market also participated in a Gift Responsibly campaign during the holiday period, with material in both English and Spanish featuring the player-tested tagline 'Tis the season to gift responsibly. Lottery games are for grown-ups – not kids.' A post-campaign survey indicated that 71% of those who saw it would be less likely to gift a lottery ticket to a minor.

Challenges we face

In 2023, we continued our impressive growth, adding new markets in the UK and the United States. Each market has in place its own robust policies and processes to ensure responsible gaming. However, the priorities related to successfully onboarding new markets have consumed a great deal of resource. As a result, our progress toward unified Group standards and measures has been slower than we would wish.

Looking ahead

We remain confident that we are heading in the right direction.

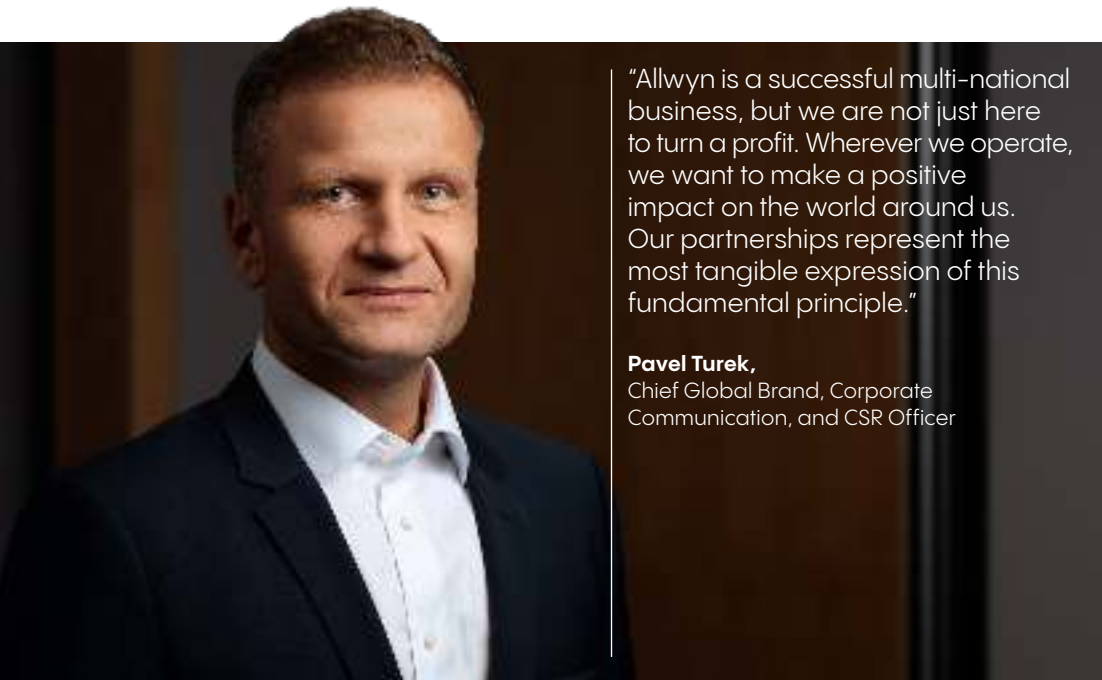
We have appointed our first Group Head of Responsible Gaming, who took office in April 2024. Her top priority will be to revise our Group Responsible Gaming Policy and develop a Group-wide Responsible Gaming Strategy by the end of 2024.

We are on track to have Group-wide responsible gaming KPIs in place by the end of 2024.

We will remain at the forefront of scientific and technological developments in this area. For example, our report *The Future of Lottery: A Game for Change*, published in April 2024, identifies future opportunities to enhance safety even further with increased real-time interventions and hyper-personalised player protection.



Partner



"Allwyn is a successful multi-national business, but we are not just here to turn a profit. Wherever we operate, we want to make a positive impact on the world around us. Our partnerships represent the most tangible expression of this fundamental principle."

Pavel Turek,
Chief Global Brand, Corporate
Communication, and CSR Officer

At Allwyn International and within Group functions, the major highlight of 2023 was the establishment of our partnership with Wings for Life World Run. Through that partnership, we contributed towards the €5.8 million total raised for spinal cord research, helped bring more than 200,000 runners together around the globe, and united nearly 900 people from our Allwyn community in one of the world's largest teams entering the event. For more details, see the case study on page 28.

We are committed to making a difference through social impact – to help address wider societal challenges and build stronger relationships with our stakeholders. By partnering with charities around the world, we reflect and honour the values we all share.

This is becoming even more crucial given the flourishing of purpose-driven consumerism, especially among young people, as identified in our April 2024 Future of Lottery report.

➔ Future of Lottery report can be found on our website.

Moreover, we rely for our success on our ability to attract diverse, talented staff, many of whom choose to join us because they believe in giving back.

Our approach and impact

Our activities and their impact

Our lotteries already contribute to Good Causes via taxation and government-mandated contributions. But Allwyn is on a mission to change lives, a little or a lot, but always for the better. At both Group and market level, we use our own funds and platform, convening power, employee time, and other resources to drive social impact. These activities support a range of social impact projects, spanning arts, music, education, culture, health, and sport. We place particular emphasis on supporting young people and disadvantaged groups.

Our policies and commitments

Our Group Sustainability Policy expresses our commitment to giving back in three ways:

1. Driving greater returns for Good Causes through sustainable growth.
2. Undertaking social responsibility projects and initiatives within Group functions and through our markets around the world.
3. Encouraging and facilitating employee involvement in local projects, making a positive impact on the ground.

In our ESG Report for 2022, we committed to establishing a structured employee volunteering programme and defining a formal process for calculating our social impact. We remain on track to deliver the first of these commitments by the end of 2024. However, the second is taking longer than anticipated, as discussed on page 30.



Our Partner commitments

Establish a structured employee volunteering programme by the end of 2024

By the end of 2024, define a formal process for calculating social impact.

How we manage our impact

Across our Group functions, we seek to maximise our positive impact by selecting charitable partners based on their integrity, effectiveness, clarity of purpose, global scope, and alignment to our fundamental values. Our Group partner function helps with this selection process, monitors partnerships in progress, and coordinates employee volunteering opportunities.

Our markets have decades of experience successfully partnering for impact. Our approach therefore seeks to provide flexibility for our markets to run their own partner activities, alongside coordination, assistance, monitoring, and information sharing with the Group.



Partner continued



How we track our effectiveness

The global CSR manager collects data from all markets annually. This is then turned into a comprehensive overview of CSR and sponsorship activities across the Group.

Our global CSR manager participates quarterly in meetings of our cross-market ESG Working Group in order to report on these matters. Following on from this, the CSR team evaluates impact and progress, and generates a list of action points for improvement.

How we engage stakeholders

Partnering for social impact is all about engaging the communities in which we live and work. In addition, our work in this area also engages our employees, by bringing them together in support of Good Causes that express our shared values; our customers, by highlighting the causes we support; and our prospective job applicants, by offering a tangible demonstration of our corporate values.

Case study:

Wings for Life World Run

According to the World Health Organization, up to a half a million people suffer a spinal cord injury each year, with consequences ranging from breathing problems to sensory disturbance, and even paralysis. Through its annual World Run event, the Wings for Life Foundation increases awareness of this issue and raises funds for research toward a treatment for spinal cord injury. Wings for Life World Run brings hundreds of thousands of runners together, whether through in-person events or via an app that records their progress in real time using GPS technology.

With its inclusivity, global scope, and focus on changing lives for the better, Wings for Life World Run is a perfect fit for Allwyn.

In 2023, we became a global partner for the event. On top of that partnership, we are proud to have contributed further by covering entry

fees for all participants from Allwyn including a plus-one. Many of our employees also made additional voluntary donations.

Together, we helped Wings for Life Foundation raise a total of €5.8 million in 2023 with almost 900 members of our community taking part. In future years, we hope to keep a high level of awareness and engagement as we continue to partner with the Wings for Life World Run. In fact, it is our ambition to help Wings for Life World Run reach one million total participants.

"Personally, I like their slogan 'where we all win', because it expresses exactly what the Wings for Life World Run stands for."

Anita Gerhardt
CEO of Wings for Life

Managing the risk

Risk

Failure to maximise the impact of our community activities, resulting from, for example, failure to identify appropriate projects, set clear goals, monitor outcomes, and/or promote awareness.

Failure to understand how best to deliver social value, resulting from, for example, ineffective or unclear engagement with stakeholders.

Mitigation

- Clear ESG and CSR strategies, translated into practical, measurable activities.
- Sound governance of these activities.
- Open, ongoing, and proactive communication with communities and partners.
- Clear engagement and cooperation with all stakeholders.
- A clear strategy, shared with each partner, offering mutual support for each other's objectives.

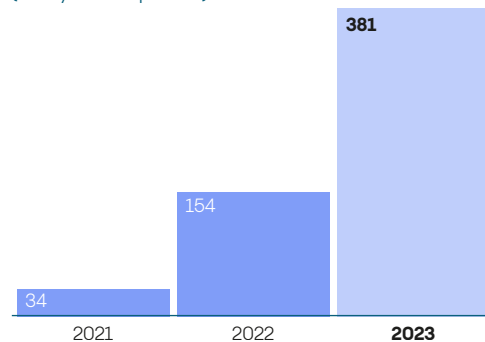
Partner continued

Our progress in 2023

Total staff volunteering days increased to 381, up from 154 in 2022.

Volunteering days

(Allwyn Group total)



We formally announced Allwyn International's flagship partner for social impact, Wings for Life World Run. For more details, see the case study on the previous page.

870

Allwyn colleagues and their +1 registered

8th

Allwyn Team was the 8th largest organised team globally (behind Adidas, Garmin, Audi, etc.)

2,732 km

Total distance of 3,468 km (which is the distance between London and Athens + halfway back)

37,8 km

Longest distance by Allwyn employee 37,8 km

In 2023, we also deepened coordination, cooperation, and information-sharing processes between our markets:

- In February, we brought together representatives from each market's CSR, brand, sponsorship, and communications teams in a workshop to share best practice and drive continued collaboration.
- In addition, the Group's CSR team visited every market, including the newly onboarded North America market. These visits helped to build community and increase coordination.

Our markets continued their long tradition of supporting social impact projects, with sport a central theme.

- Our Greek market launched a programme called Stoiximan Wheels of Change, designed to break down barriers for people with disabilities, celebrate their unique talents, and support their participation in sport. In 2023, our Greece team provided 80 custom wheelchairs alongside free training with specialised coaches in Athens and Thessaloniki.
- Our Austrian market built upon a 75-year-long track record of funding Austrian sport. Beneficiaries included professional and amateur sports associations as well as government bodies like Federal Sports Association and the Austrian Olympic and Paralympic Committees. Collectively, these represented around 1.8 million sports club members across the country.
- To assist athletes and raise the bar in sports medicine, our Czech market funded a state-of-the-art MRI scanner at the Pavel Kolář Centre for Movement Medicine in Prague.



Case study:

A decade of wishes



For our Greece team, the festive season is synonymous with giving back. This was especially true in 2023, which saw the tenth anniversary of Wishing Ornaments, in which children in need draw what they would like for Christmas and the team collects donations to make this a reality.

The team invited people to contribute to Wishing Ornaments in a special pop-up van that visited the Greek market's stores; online through the "Contribution Squad" app and website; and in Wishing Ornaments galleries inside big shopping malls in Athens and Thessaloniki.

Since the launch of the programme, Wishing Ornaments has made almost 62,000 wishes a reality, as well as implementing some 50 construction works and supply projects for participating charities.

Greece faced tough challenges in 2023 in the shape of two major natural disasters. In the face of Storm Daniel and the wildfires in Greece;

- In Thessaly, we coordinated with our local network of retailers as well as the Hellenic Red Cross to distribute 100,000 bottles of water to people whose water supply had been cut off or polluted.
- On Rhodes, we supplied equipment to those battling the blazes, delivering 30 specialist forest firefighting hoses alongside helmets, face masks, and gloves for the municipal government's entire team of volunteer firefighters.

Partner continued



Case study:

Our Commitment to Austria

Our Austrian market has long worked to create social value. In 2023, the nationwide Our Commitment to Austria initiative was launched, which sees each of Austria's 12 casinos choose three local partners to support. The 36 new partners included cancer charities, aid organisations for the disabled, and women's shelters.

Staff were encouraged and enabled to volunteer their time working for the selected charities. Thanks to this support, the new partners will enjoy significantly more scope to make an impact in their communities.



Challenges we face

As the information in this pillar shows, Allwyn is creating social value both across Group functions and in our markets. However, in view of the complexity of this issue and the ongoing challenges posed by our international growth, we have had to move back the target date for defining a process for calculating and reporting social value. This was originally set for the end of 2024. We will instead take time to build up our partnerships with Wings for Life and More than Equal (see Looking ahead, opposite), learn from those experiences, and feed the resulting lessons into the design of our new process.

Going forward, we have decided to change our methodology for reporting sponsorships and donations. For details, see our GRI index on page 45 of this report.



Looking ahead

Partnering for social impact will always be a priority for Allwyn, both across our Group functions and in our markets. As in other areas of this report, the major theme going forward will be enhanced coordination. Therefore, by the end of 2024, we aim to have introduced social impact KPIs across the Group.

Meanwhile, we are working to unify corporate volunteering programmes under a single umbrella, while still allowing the maximum flexibility for each market.

During the second half of 2024, we will activate our second flagship partnership across Group functions. In collaboration with More than Equal, a charity that spans diversity, equity, and inclusion ("DEI") and motorsport, we will engage and upskill Allwyn staff on DEI issues while working to support and accelerate More than Equal's vision of gender equality in Formula 1. We will have much more to say about this partnership in next year's report.

People



"At Allwyn, people are by far our most important asset. Whether pursuing sound governance, safe play, social impact, or environmental stewardship, our success is built upon the passion and hard work of our thousands of talented colleagues around the world."

Naida Buljugic,
Chief People & Culture Officer

I took on my current role in 2023, and I could not have chosen a more exciting time. Allwyn is not only growing; our culture is becoming increasingly multi-national. As we welcome colleagues from a huge variety of nationalities, backgrounds, and cultures, Allwyn's future will depend above all upon four key priorities:

- Our corporate culture.
- Our ability to attract, retain, and develop top talent.
- Our diversity, equity, and inclusion.
- Our drive to perform.

With each of these elements in place, Allwyn will be able to power innovation and creative thinking well into the future.

Our approach and impact

Our activities and their impact

Allwyn employs over 7,500 people across Europe and in the United States. It is our responsibility to ensure their safety and well-being in the workplace.

We want to make a positive impact on the lives of our people, including through well-being events, volunteering opportunities and ongoing learning and development.

Our policies

Our Group Sustainability Policy expresses our commitment to empowering and motivating our employees. Our revised Code of Conduct, together with our policies on compliance,

grievance, whistleblowing, and other policies, set out the standards of conduct we expect from all employees.

To facilitate compliance with local laws, regulations, and standards, each market has in place its own Code of Conduct. These are required to align with the core principles underpinning Allwyn's policies across Group functions.

Our markets have in place listening strategies for continuous employee engagement. Based on these successful strategies, we are in the process of consolidating our approach and developing a Group-wide tool for listening.



Our People commitments

Implement a Group-wide employee listening strategy and define areas for improving engagement.

How we manage our impact

The People function is responsible for human resources matters across Group functions. These include the following:

- Offering competitive salaries and benefits.
- Providing learning and career development opportunities.
- Maintaining a diverse, attractive workplace.
- Ensuring freedom from discrimination.
- Coordinating with the markets on all People-related matters.

Our markets engage in a range of activities to foster DEI from tailored support for colleagues with disabilities to programmes designed to promote diverse leadership.

The People function works together with the Partner function to organise volunteering activities and encourage staff participation.

Each of our markets keeps its salary and benefits packages under review to ensure that we remain competitive in the market while providing the best possible living standards for our staff.

How we track our effectiveness

Establishing robust measures for tracking our effectiveness on People issues remains one of our key priorities. We began systematically collecting HR data in 2023. Our future plans include the following:

- Setting KPIs linked to People issues such as improving a gender balance.
- Conducting a values based engagement and feedback process by the end of 2024 across Group functions.
- Establishing listening mechanisms for collecting employee feedback on a continuous basis.
- Creating a Group-wide reporting framework for capturing People activities.

How we engage stakeholders

Our employees rank among our most important stakeholders. We seek to engage them in a variety of ways, such as:

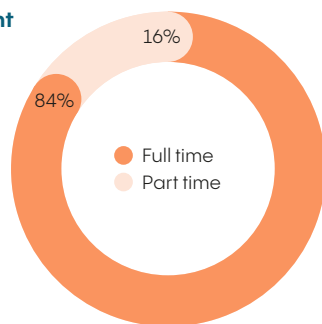
- Opportunities to volunteer or otherwise support charitable causes.
- Regular health and well-being-focused activities at our offices and online.
- Networking via our new intranet platform, ANNA (Allwyn Networking, News, and Administration). Updated daily, ANNA offers a central hub for sharing information from around the Group. Following a successful launch in 2023, the team is in the process of collecting feedback which it will use to improve internal communication and engagement strategy further.

People continued

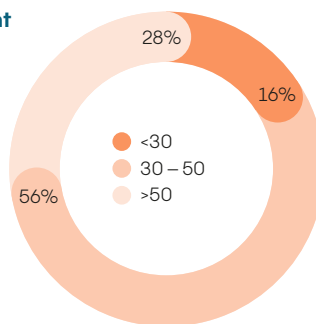
Managing the risk

Risk	Mitigation
Low staff health, well-being, or motivation, resulting from, for example, inadequate pay, recognition, or career development opportunities.	- Competitive remuneration, tied to appropriate individual and company goals. - Measures to create a positive, motivating work environment that empowers staff. - Good workforce management aligned to the evolving requirements of the business.
Failure to ensure sufficient diversity and inclusion in the workplace, resulting in damage to Allwyn's reputation and/or effectiveness in operations and innovation.	- Clear diversity and inclusion goals, owned and driven by leadership. - Measures to ensure a diversity of backgrounds, opinions, and approaches among staff. - Collection, analysis, and monitoring of feedback from a range of sources.

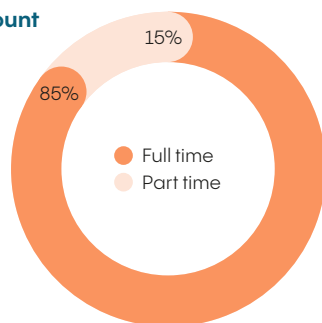
Male headcount by occupation in 2023



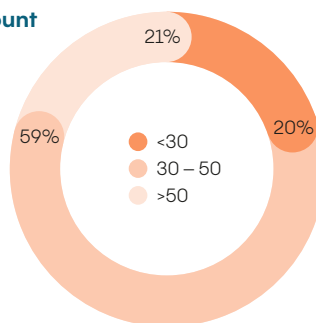
Male headcount by age in 2023



Female headcount by occupation in 2023



Female headcount by age in 2023



Our progress in 2023

For our staff, Allwyn's growth brings both challenges and opportunities. This makes the mission of our People function all the more important.

In shaping a Group-wide culture, we seek to preserve and build upon the vibrant, successful cultures that already exist in each of our markets. In 2023, we continued to strengthen Group cohesion in a variety of ways:

- We instilled new leadership with the appointment of our first Chief People & Culture Officer, Naida Buljugic.
- With input from every market, we redefined Allwyn's shared values (see page 3). These were confirmed with market CEOs in November 2023 and an alignment process is now underway across all markets.
- Aligned to our values, and with involvement from all markets, we established the core pillars of our unified leadership profile:

starting from within; transforming the business; and building high-performing teams. This profile will inform recruitment, development, and promotion of talent.

- We successfully onboarded our United Kingdom and North American markets.
- We strengthened cross-Group teams working on brand, communications, and partnerships.
- We laid the groundwork for additional Group-wide topic-based communities-groups and networks of staff brought together around shared interests, passions, and areas of professional focus.
- We launched our Group-wide intranet, ANNA.
- In keeping with our tradition of supporting social impact, we brought staff together via our volunteering programme and our new partnership with Wings for Life World Run, in which around 900 Allwyn employees took part. For more details, see page 28.



People continued

Across Group functions, we conducted an employee pulse survey and were pleased with its overall engagement rate of 80%. In response, we have distilled the feedback into themes for future development. For example, we are in the process of implementing 360-degree feedback for senior managers and are addressing questions raised around remote working.

We deepened our commitment to improving DEI:

- We established a Group-wide DEI Working Group, with the aims of sharing best practice; fostering cross-market collaboration; and, ultimately, creating a Group DEI strategy built on the best elements of market strategies.
- We launched our Power of Diversity programme across Group functions, kicking it off with training on recognising and addressing unconscious bias in the workplace. These workshops were made available to all staff with the goal of raising awareness of this important issue.
- Our UK market achieved the first of three levels in the UK government's Disability Confident accreditation scheme. This achievement recognises our UK market's commitment to recruiting, retaining, and developing people with disabilities within its workforce. In 2024 and beyond, the UK team is pursuing the next two levels of accreditation.

- Our Austrian market commissioned an analysis of the difference in coverage between women's and men's sports in Austrian media. Based on the results, the team calculated that if men and women began the year with equal coverage, women's coverage would cease on 1 March. The team went on to declare 1 March 2024 its first annual Equal Play Day, drawing attention to the deep disparities. We will report further on this in next year's ESG Report.

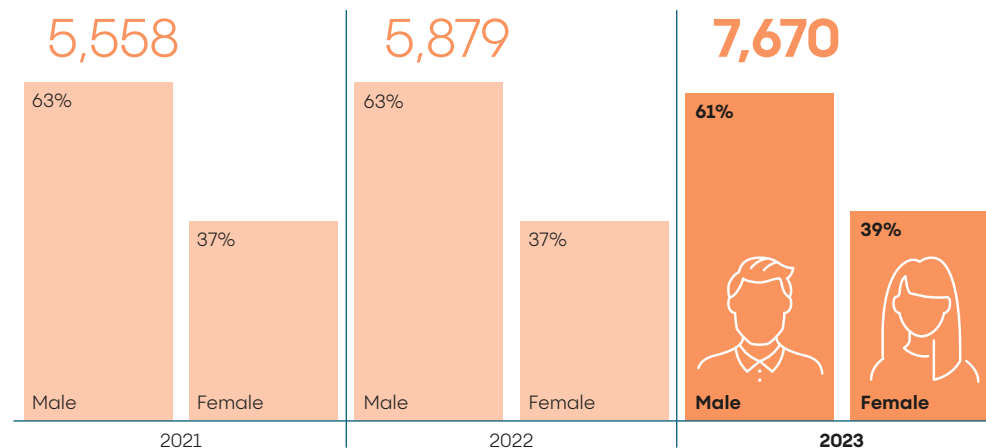
- We prepared for the full launch of our partnership with More than Equal by carrying out research and interviews to understand the DEI landscape across the Group and Allwyn's ambitions for enhancing equity. See the Partner pillar on page 30 for more details of this partnership.

Our total spending on professional development remained roughly steady at €471 per employee in 2023, compared with €485 in 2022, and despite the transition phase of our UK market.

We also continued our focus on health and well-being:

- Several markets held health days, offering employees advice and services such as discounted gym membership.
- Our Prague office offered personalised consultations with a physiotherapist.
- As part of Mental Health Awareness Week, we organised a Group-wide webinar on the importance of sleep.
- Among many other health-related benefits, our Greek market held 22 "Cyber Talk" sessions focusing on mental health and well-being. 631 employees took part.

Number of employees



Several markets won awards for their efforts to create a better working environment

Greece

- Top Employer 2023 (2nd continuous year) by Top Employers Institute
- Greek HR awards: Best Talent Management & Retention Initiative, Bronze in 2023

Austria

- Certified as family-friendly employer
- 12th overall at the "Best recruiters"
- "Kununu Top Company"

Czech Republic

- 1st place – Employer of the decade 2013–2022 (up to 500 employees, the Czech Republic)
- 2nd place – Employer of the year 2022 (up to 500 employees, the Czech Republic)
- 2nd place – Employer of the year 2022 (up to 500 employees, Prague)

United States (Illinois)

- Great Place to Work 2023
- Built In Chicago Best Places to Work 2023
- Crain's Best Places to Work in Chicago 2023

People continued

Case study:

Building a brand for diversity



Allwyn's markets are long-standing supporters of sport. win2day, our Austrian market's iGaming brand, is the nation's main sponsor of a range of sports, including ice hockey, tennis, basketball, American Football, beach volleyball and table tennis. In all cases, win2day strives to ensure that it offers equal support regardless of the athletes competing, whether female or male, with or without visible disabilities.

In 2023, the World Cup of 3x3 basketball (a fast-paced variant of the sport) was held in Vienna, making win2day a natural choice for top sponsor. But its support came with a precondition: wheelchair athletes must be allowed to compete on centre court, just like their non-disabled counterparts. Initially, FIBA (basketball's international governing body), was reluctant. But win2day made clear, that this condition was non-negotiable. If it was not met, it would not sponsor the competition.

In the end, equality won out. Wheelchair players were allowed to play an exhibition tournament on centre court. Better yet, the men's wheelchair final was scheduled immediately before the non-disabled men's final, ensuring a large audience.

Fans loved seeing 3x3 wheelchair basketball presented so prominently. As a result, the 3x3 Europe Cup 2024 (also being held in Vienna) will – for the first time in history – feature an official Europe Cup for 3x3 wheelchair basketball. So, FIBA has changed its competition rules to bring greater attention to this exciting para-sport.



"At win2day, we stand for fair play and equality. We live this attitude all year round. Our experience in 2023 shows that our local activities can have a global positive impact on sports and furthermore, on society."

Georg Wawer

Managing Director of win2day

The Austria team's commitment to diversity does not stop there. In 2023, win2day commissioned an analysis of the differences in media coverage between men's and women's sport. The study found that more than 80% of coverage focused on men. From this, our Austrian team calculated that, if men and women started the year with equal coverage, women's sport would cease to be covered at all after 1 March. It has therefore appointed 1 March 2024 as the first annual Equal Play Day, bringing much-needed attention to these discrepancies. We will have more to say about Equal Play Day in our 2024 ESG Report.

"It is so important that women's sport becomes more visible, so that young female athletes have female role models that they can emulate. More media visibility for female athletes also increases the chances of lucrative sponsorship contracts. More investment increases the opportunities for professionalisation. That's why it's so important to draw attention to this imbalance with initiatives like Equal Play Day."

Lisa Zderadicka

Pro women's basketball player

People continued

Case study:

Making space for play



Volunteering together creates social impact, enhances Allwyn's reputation, and supports employee engagement by fostering a culture of giving back across the Group. Each year, colleagues in Allwyn's Czech market enjoy the opportunity to spend up to two paid days volunteering outside the office. In 2023, some chose to use their volunteering days helping to create a more magical experience for young children.

The 48 pupils of the St James's Church nursery school in Kutná Hora, a small town east of Prague, get to spend at least two hours each day playing in the nursery's garden, where they experience the joys of fresh air and nature in a safe environment.

Recognising the benefits its garden provides, the nursery commissioned an architect to transform the space, creating an even more stimulating environment. In 2023, selected Allwyn staff chose to lend a hand with this transformation by helping to dig the excavations in preparation for building.

Although the project is still in its early stages, once the makeover is complete, the site will feature a ball track, a slide, and a sandpit allowing children to dig tunnels. Our Czech colleagues are proud of their contribution, and Allwyn is pleased to have given them the opportunity to help.

Challenges we face

In our 2022 ESG Report, we committed to carrying out a Group-wide employee engagement survey. On reflection, we have decided to take a different approach to employee engagement. We will focus on developing a unified strategy for continuous listening, designed jointly with markets and built on several tools and channels (see "Looking ahead", opposite).

We remain committed to our objectives of creating a unified culture and promoting DEI. While we are not yet where we want to be on either front, we are making progress and remain confident of ultimate success.

In particular, we have more work to do around gender equality. Our customers are evenly split between men and women, and we should represent them accurately. The year 2023 saw an increase in women's representation in our top management, including the Group's first female market-level CEO, Andria Vidler in the UK. But our overall gender split remained roughly constant. Going forward, addressing this will remain a top priority. See opposite for some examples of how we intend to pursue this objective.

We have restated some of our 2022 gender split data. In addition, going forward we will report diversity data on the basis of headcount only. For details, see our GRI index on page 46 of this report.

Looking ahead

In 2024 and beyond, we will continue to strengthen Allwyn's culture. As discussed above, we are in the process of aligning on values across our markets. In addition:

- In 2024 we will conduct values based engagement and feedback process across Group functions.
- In parallel, we are also moving toward designing and piloting a broader listening strategy, with a view to rolling it out in 2025.
- We are working on formal frameworks for identifying high-potential staff members and for offering cross-Group career and development opportunities.

Meanwhile, we will pursue increased DEI:

- In 2024, we will activate our partnership with the gender equality not-for-profit organisation More than Equal.
- We are in the process of designing a Group-wide DEI strategy and implementing initiatives co-created with the DEI Working Group while expanding the DEI community internally and inviting volunteers into the process.
- We are continuing the Power of Diversity programme, with activities focused on respectful communication and leveraging the diversity of our teams.
- Our Group People function is coordinating discussions toward living-wage assessments in several markets.
- In addition, in recognition of the broad benefits of corporate volunteering, we have committed to establishing a structured employee volunteering programme by the end of 2024.



Planet



"Lotteries might not rank among the biggest emitters, but we recognise that everyone has their part to play in driving climate action and moving towards a more sustainable future."

Jan Matuska,
Chief of Staff & Strategy

Our ultimate goal is to set a science-based emissions reduction target validated by SBTi. I am proud that, in 2023, we took a major step in this direction by submitting our commitment letter to the SBTi to start the process. Meanwhile, we are working alongside our suppliers and business partners to start collecting data on our Scope 3 (indirect) emissions.

We are still at an early stage in this journey, but our understanding and know-how are growing all the time. We remain committed to action and are confident that we are heading in the right direction.

Our approach and impact

Our activities and their impact

We maintain administrative offices in the countries where we are present. In selected markets, we also have retail stores, distribution centres, and gaming venues. These buildings consume energy and water, and generate waste, including e-waste. Commuting and business travel also generate emissions.

Many of our products are digital in nature, which means that they create Scope 3 emissions in the form of the electricity used to run servers. In addition, in most of our markets we also sell physical products like scratchcards and use paper slips for placing or confirming bets. All but one of our markets exclusively uses paper that is certified sustainably sourced.

"At European Lotteries, we launched an environmental programme aiming to create a collective dynamic among lottery members on concrete commitments in the environmental field... I am happy that most European markets of Allwyn joined both initiatives, and I'm looking forward to the results. Sustainability and responsibility are in the DNA of lotteries and together we can act to safeguard the future of our planet."

Romana Girandon

Loterija Slovenije, European Lotteries President, Supervisory Chair of the European Lotteries Sustainability and Responsible Gaming Working Group

Our policies and commitments

Our Group Sustainability Policy expresses our commitment to minimising our impact on the environment. Each of our markets has in place its own sustainability policies in line with local laws and aligned with our Group Sustainability Policy.

While we will be working on science-based emissions reduction targets, we remain committed to reduce our Scope 1 and Scope 2 emissions by 30% by 2030 compared with 2021.



Our Planet targets

At the end of 2023, Allwyn submitted our commitment letter to the SBTi, beginning the process of establishing a science-based target.

As an interim stage, Allwyn has committed to reducing Scope 1 and Scope 2 emissions by 30% by 2030.

This target will be superseded by Allwyn's science-based target once it is validated by the SBTi.

How we manage our impact

As we state in our Group Sustainability Policy, we seek environmentally sustainable initiatives that deliver near and long-term efficiency, value, and health for our business, our people, our stakeholders, and the wider community.

We also encourage our customers, suppliers, and retail network to reduce their respective impacts on the environment by recommending the use of more sustainable materials and processes.

How we track our effectiveness

We already calculate and track our emissions under Scope 1 and Scope 2 of the Greenhouse Gas Protocol, and we are working to add Scope 3 in the future.

The Board and the Chief of Staff & Strategy keep our progress under regular review. They are supported by the cross-market ESG Working Group, which meets monthly to monitor progress and exchange best practice.

Planet continued

Case study:

Helping suppliers go green



In 2023, our UK team made further progress on its promise to build the world's first net zero lottery. Among other things, the team took action to reduce its Scope 1 and Scope 2 emissions by reviewing its energy efficiency practices; implementing smarter maintenance of equipment and facilities; and replacing inefficient light fittings with LEDs.

As with all our markets, however, we anticipate that the most significant emissions will fall into Scope 3, which covers indirect emissions from a company's value chain. Knowing this, our UK market has been working to engage suppliers. For its scratchcards, it already exclusively uses paper that is recyclable and 100% FSC certified.

In addition, our UK market requires prospective suppliers to complete a social value questionnaire, which includes questions around environmental impact. The answers are given a substantial weighting in the UK market's tender process. This has helped, for example, in selecting a supplier for permanent points of sale (the physical stands where customers can fill in tickets or buy scratchcards) with a significant reduction in the embodied carbon of the future designs. Unusually for our industry, the supplier was able to quantify how much embodied carbon this could save.

Our UK market will not stop there. In the future, it plans to work alongside its smaller suppliers to help them establish and meet environmental targets of their own.

How we engage stakeholders

We instruct our employees to take everyday sustainable actions, such as separating waste and replacing inefficient light bulbs with LEDs. As we pursue calculation of our Scope 3 emissions, we will be in a much better position to determine where most of the emissions come from and act accordingly, for example by engaging more closely with our suppliers and business partners.

In addition, we have engaged with a prominent trade association in our field by joining the European Lotteries Association's Environmental Initiative.

In Q4 2023, we began the process of establishing a standardised methodology for collecting and calculating Scope 3 emissions data across all our consolidated markets with lottery operations. We expect this process to last about a year. Once complete, it will allow us to make direct comparisons across markets, thereby making it easier to share best practice across the Group.



In Q4 2023, we submitted our commitment letter to the SBTi, starting the process of setting a science-based emissions reduction target for Allwyn and achieving one of the commitments we made in our 2022 ESG Report.

We encouraged our markets to commit to the European Lotteries' Environmental Initiative. This voluntary initiative encourages lotteries to monitor their carbon footprint (including Scope 3 emissions); adopt an action plan for emissions reduction; and take further concrete action, such as using only paper from forests certified sustainable. All our European markets are working on Scope 3 emissions measurement, and most already use exclusively Forest Stewardship Council ("FSC") certified paper for scratchcards. These activities help us align to SDG 12, which encourages responsible procurement.

Throughout 2023, our markets took steps to reduce their carbon footprints. For example:

- Our UK market continued to deliver on its landmark pledge to create the world's first net zero national lottery. See the case study on the left for more information.
- Our Austrian market completed a redesign of its buildings and installed solar panels. See the case study on page 39 for more information.
- Our Greek market continued to develop its environmental strategy by defining its three core pillars: Carbon Footprint Management; Waste and Water Stewardship; and Climate Resilience and Environmental Compliance.
- Our Greek market also helped finance energy-saving initiatives in its retail stores. See the case study on page 40 for more information.

Managing the risk

Risk

Damage or injury resulting from extreme weather events and chronic shifts in climate.

Volatility in our supply chain resulting from the transition to a more environmentally friendly economy.

Mitigation

- Forward planning for business continuity, crisis management, and disaster recovery.
- Maintaining adequate insurance to protect against losses.
- Monitoring the balance between retail and digital distribution channels.

- Proactive innovation to stay ahead of advances in technology and changes in consumer preferences.
- Supply-chain diversification to promote resilience.
- Visible, genuine, long-term commitment to environmental sustainability.

Planet continued

Our progress in 2023

In absolute terms, Allwyn's energy consumption increased 8.6% to 222,373 GJ in 2023 compared with 2022 (excluding the Casinos Austria International business). However, this increase was due to our strategic acquisitions in the UK and North America. Disregarding these acquisitions to achieve a like-for-like comparison, our energy consumption decreased by 4.6%, primarily because several markets moved their operations to less energy-intensive buildings.

We calculate our energy intensity in two ways; in proportion to our employees and to our GGR. In 2023, our energy intensity declined by 21.6% to 9.2 MWh per employee and by 45.2% to 8.2 MWh per €1 million GGR. The larger decline is due to the inclusion of the UK market in our consolidation, which has a lower-than-average energy intensity. Excluding acquisitions, our energy intensity declined by 13.2% to 10.2 MWh per employee and by 10.7% to 13.3 MWh per €1 million GGR.

Energy consumption and intensity	2021	2022	2023
Total fuel consumption within the organisation from non-renewable sources (GJ)	35,024	36,883	43,403
Total fuel consumption within the organisation from non-renewable sources (million litres (diesel+gasoline))	1.01	1.07	1.3
Electricity consumption (MWh)	29,703	32,991	34,687
Gas consumption (GJ)	23,634	12,885	15,204
Thermal energy (GJ)	38,544	36,226	38,891
Total heating consumption (GJ)	62,178	49,110	54,095
Total energy consumption (GJ)	204,132	204,760	222,373
Energy intensity per employee (MWh)	12.2	11.8	9.2
Energy intensity per GGR (MWh per € m)	18.5	14.9	8.2
Emissions (Scope 1 & 2)	2021	2022	2023
Gross direct (Scope 1) GHG emissions (metric tons of CO ₂) ¹	5,352*	3,932*	4,783
Gross location-based indirect (Scope 2) GHG emissions (metric tons of CO ₂) ²	9,789*	9,411*	9,261
Gross market-based indirect (Scope 2) GHG emissions (metric tons of CO ₂)		4,101*	4,123
Emissions intensity	2021	2022	2023
Emission intensity per €m GGR (location based)	5.1	3.7	1.9
Emission intensity per €m GGR (market based)		2.2	1.2

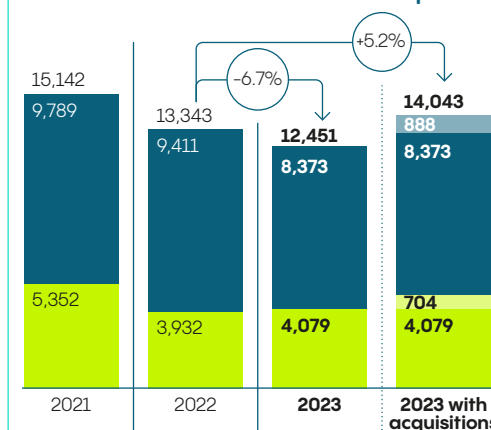
* Restatement: see our GRI index on page 46.

The reported figures for Scopes 1 and 2 GHG emissions exclude emissions from the international operations of Casinos Austria International (CAI) as we have not yet been able to collect this data. We estimate these figures to be several thousand tonnes of CO₂ equivalent, which may significantly impact our reported results. Our aim is to continue increasing the accuracy of our reported values by calculating and including GHG emissions from CAI operations in future reports.

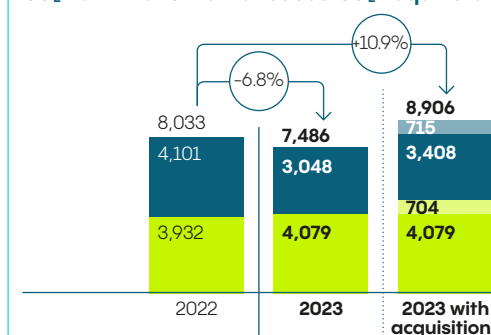
Considering the newly reported values, we saw an absolute increase in Scope 1 and 2 emissions by 5.2% on a location-based basis and 10.9% market-based basis. Excluding our 2023 acquisitions, in like-for-like terms, we recorded an overall decrease of 6.7% on a location-based basis and 6.8% on a market-based basis. While our Scope 1 emissions increased by 3.7% on a like-for-like basis, this rise was more than offset by a reduction in Scope 2 emissions due to lower electricity consumption and a higher proportion of suppliers providing electricity from renewable sources.

We calculate Scope 1 and 2 emissions intensity in proportion to our GGR. In 2023, our emissions intensity decreased by 48.3% per €1 million GGR on a location-based basis and by 45.6% on a market-based basis. Similar to the energy intensity, this large decline is primarily due to the inclusion of the UK market in our consolidation. Excluding our acquisitions, the emissions intensity per €1 million GGR fell by 13.0% on a location-based basis and 13.1% on a market-based basis.

CO₂ 2021–2023 location based CO₂ t equivalent



CO₂ 2022–2023 market based CO₂ t equivalent

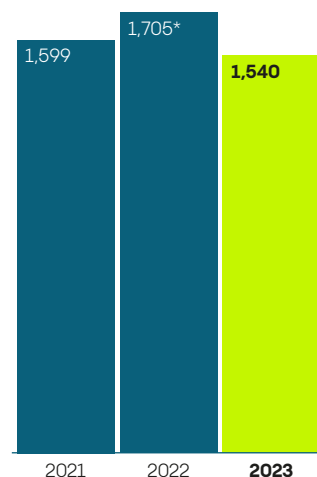


● Scope 1
● Scope 2
● Scope 1 of acquisitions
● Scope 2 of acquisitions

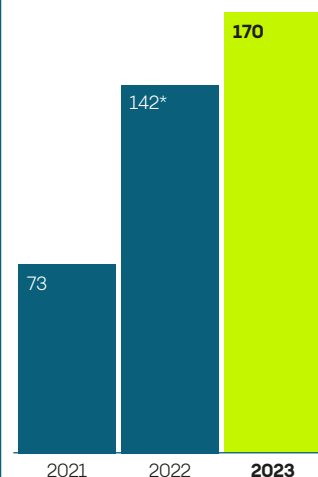
In 2023, we restated our 2021 and 2022 CO₂ measurements for selected markets. For details on the amounts and reasons behind this restatement, please refer to the restatement table on page 43 and our GRI Index on page 46 of this report.

Planet continued

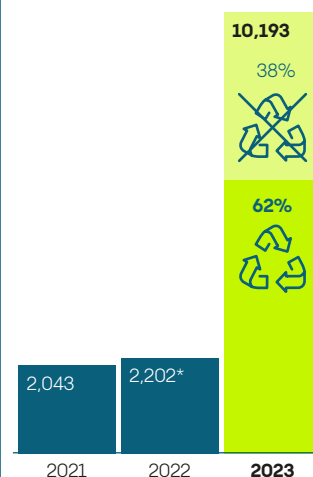
Total weight of material used
(Tonnes)



Total water consumption within the organisation
(Megalitres)



Total waste generated
(Tonnes)



* Restatement: see our GRI index on pages 45 and 46.

Based on restated figures, our water consumption increased in 2023 compared with the previous year. This change is accounted for by increased visitors to our venues, hotter summers, and more water spent on irrigation. For further information on the restatement of our 2022 water consumption, please see our GRI Index on page 45 of this report.

For the first time, we can report the percentage of waste which is being recycled. This year, the figure was 62%. Overall, however, we generated substantially more waste in 2023 compared with 2022. This is because of the consolidation of our United Kingdom and North American markets and the refurbishment of our Austrian offices. We expect a lower result next year.



Case study:

New ways of working, lighting, and powering



Austria has set itself a target of achieving climate neutrality by 2040, and Allwyn's Austrian team is determined to play its part in achieving that goal.

In 2023, after two years of work, our Austrian market completed a comprehensive refit of its offices, converting them into flexible open spaces that encourage collaborative interaction. This project, entitled DNA – Das Neue Arbeiten ("the new way of working"), is set to benefit the environment as well as our Austrian team members.

By reducing floorspace, it will avoid emissions of 72 tonnes of CO₂ equivalent, while the switch to LED lighting with motion detectors will result in energy savings of over 60%.

Meanwhile, the Austrian market's casino in Baden has installed solar panels on its roof, to enable emission-free generation of around 130,000 kWh of electricity every year. In this way, the panels will pay for themselves within five years. After that, they will continue generating electricity for 15-25 more years. Our Austrian market is now looking at installing solar panels at two further sites in Velden and Bregenz.

Planet continued



Case study:

Energy saving initiatives for Greek retail network and casinos



Our Greek market enjoys an extensive network of retail partners, with more than 3,700 stores across Greece and Cyprus.

Allwyn's Greek team decided to help its retail partners by offering energy loans designed to finance a range of energy-saving initiatives, including solar panels, high-efficiency air conditioners, LED lighting,

and motion sensors. Launched in 2022, the programme proved so popular that our Greek market increased funding for it in 2023.

As a result, participating partners will reduce their energy consumption and avoid carbon emissions. As we increasingly get to grips with our Scope 3 emissions, our Greek market's example will inspire further innovation across the Group.

Challenges we face

In our 2022 ESG Report, we stated our plan to seek a flagship partner in the environmental realm. For the time being, we have chosen to prioritise our partnerships with Wings for Life World Run and More than Equal (see the Partner pillar). However, we still plan to establish a flagship environmental partnership in the future.

As mentioned above, we have restated our 2022 data for water consumption and emissions. For details, see our GRI index on pages 45 and 46 of this report.

Looking ahead

As we reported above, we are working toward collecting and calculating our Scope 3 emissions data. We expect to be able to publish our methodology and calculated values by the end of 2024.

We remain committed to the SBTi process. By the end of 2024, we will develop and submit our proposed target for validation. And by the end of 2025, we will begin planning to achieve our validated target.

We will continue to explore initiatives to reduce our waste-to-landfill output, for example by recycling scratchcards.

This is a new field for us, but as we seek to do more to achieve our emissions targets, we are moving away from lower-hanging fruit and toward more complex areas. In the process, we expect our journey toward sustainability to become more challenging, as well as more inspiring. Nevertheless, we remain confident and determined to reduce our environmental impact.



Risk overview

Play

Risk	Mitigation
Underage or otherwise unsafe play poses dangers to players, minors, vulnerable groups, families, and society at large. Any deficiencies in Allwyn's approach to responsible gaming might exacerbate these risks.	- Rigorous policies on responsible gaming, including guidelines on product design, customer interaction, marketing, and advertising. - Monitoring and intervention procedures backed by data analysis and AI tools. - Partnerships with leading organisations providing research, prevention, and treatment.
Failure to comply with applicable laws, regulations, and standards could result in exposure to legal, regulatory, and reputational liabilities.	- A strong culture of compliance, assured through comprehensive training and open, continuous engagement with external stakeholders. - Responsible design, marketing, and operation of all products.

People

Risk	Mitigation
Low staff health, well-being, or motivation, resulting from, for example, inadequate pay, recognition, or career development opportunities.	- Competitive remuneration, tied to appropriate individual and company goals. - Measures to create a positive, motivating work environment that empowers staff. - Good workforce management aligned to the evolving requirements of the business.
Failure to ensure sufficient diversity and inclusion in the workplace, resulting in damage to Allwyn's reputation and/or effectiveness in operations and innovation.	- Clear diversity and inclusion goals, owned and driven by leadership. - Measures to ensure a diversity of backgrounds, opinions, and approaches among staff. - Collection, analysis, and monitoring of feedback from a range of sources.

Partner

Risk	Mitigation
Failure to maximise the impact of our community activities, resulting from, for example, failure to identify appropriate projects, set clear goals, monitor outcomes, and/or promote awareness.	- Clear ESG and CSR strategies, translated into practical, measurable activities. - Sound governance of these activities. - Open, ongoing, and proactive communication with communities and partners.
Failure to understand how best to deliver social value, resulting from, for example, ineffective or unclear engagement with stakeholders.	- Clear engagement and cooperation with all stakeholders. - A clear strategy, shared with each partner, offering mutual support for each other's objectives.

Planet

Risk	Mitigation
Damage or injury resulting from extreme weather events and chronic shifts in climate.	- Forward planning for business continuity, crisis management, and disaster recovery. - Maintaining adequate insurance to protect against losses. - Monitoring the balance between retail and digital distribution channels.
Volatility in our supply chain resulting from the transition to a more environmentally friendly economy.	- Proactive innovation to stay ahead of advances in technology and changes in consumer preferences. - Supply-chain diversification to promote resilience. - Visible, genuine, long-term commitment to environmental sustainability.

Aggregated data tables

Governance, compliance and risk management

	2021	2022	2023	Page reference to charts
Total number of actions taken against player accounts for fraud			4,495	
Total number of legal actions pending or completed alleging anti-competitive behaviour and violations of anti-trust and monopoly legislation.	0	2	3	
Total number of substantiated complaints received concerning breaches of customer privacy	0	0	0	
Total number of identified leaks, thefts, or losses of customer data.	0	1	1	

Partner

	2021	2022	2023	Page reference to charts
Total number of volunteering days	34	154	381	Page 29

People

	2021	2022	2023	Page reference to charts
Turnover ratio total (%)	22.3	20.9	19.7	
Total investment on training and development (€m)	1.7	2.3	3.1	
Hours of training per employee	10.4	10.5	12.2	
Total spend on training and development per employee (€)	373	485	471	
Percentage of employees using flexible working hours (%)		28	39	
Percentage of home office days over total days worked (%)		18	24	
LTA (divider 200,000)		0.92	0.46	
LTFIR (divider 1,000,000)		0.74	0.44	

People

	2021	2022	2023	Page reference to charts
Sickness hours as a percentage of total worked hours (%)		2.8	2.2	
Number of fatalities	0	0	0	
Number of work-related injuries with high consequence	0	0	0	
Total number of recordable work-related injuries	2	6	6	
Total number of employees	5,558	5,879	7,670	Page 33
Percentage of male employees (%)	63	63	61	Page 2
Percentage of female employees (%)	37	37	39	Page 2
Full-time male headcount (%)		80*	84	Page 32
Part-time male headcount (%)		20*	16	Page 32
Full-time female headcount (%)		81*	85	Page 32
Part-time female headcount (%)		19*	15	Page 32
Male headcount by permanent contract (%)		97	98	
Male headcount by fixed-term contract (%)		3	2	
Female headcount by permanent contract (%)		98	96	
Female headcount by fixed-term contract (%)		2	4	
Male headcount by age (<30) (%)		14	16	Page 32
Male headcount by age (30-50) (%)		55	56	Page 32
Male headcount by age (>50) (%)		31	28	Page 32
Female headcount by age (<30) (%)		20	20	Page 32
Female headcount by age (30-50) (%)		60	59	Page 32
Female headcount by age (>50) (%)		20	21	Page 32
Total number of incidents of discrimination	0	0	5	
Total number of incidents of discrimination cases closed within 3 months	0	0	5	

* Restatement: see our GRI index on page 46.

Aggregated data tables continued

Planet

	2021	2022	2023	Page reference to charts
Total fuel consumption within the organisation from non-renewable sources (GJ)	35,024	36,883	43,403	
Total fuel consumption within the organisation from non-renewable sources (million litres (diesel+gasoline))	1.01	1.07	1.30	
Electricity consumption (MWh)	29,703	32,991	34,687	
Gas consumption (GJ)	23,634	12,885	15,204	
Thermal energy (GJ)	38,544	36,226	38,891	
Total heating consumption (GJ)	62,178	49,110	54,095	
Total energy consumption (GJ)	204,132	204,760	222,373	
Energy intensity per employee (MWh)	12.2	11.8	9.2	
Energy intensity per GGR (MWh per €m)	18.5	14.9	8.2	
Gross direct (Scope 1) GHG emissions (metric tons of CO ₂)	5,352*	3,932*	4,783	Page 38
Gross location-based indirect (Scope 2) GHG emissions (metric tons of CO ₂)	9,789*	9,411*	9,261	Page 38
Gross market-based indirect (Scope 2) GHG emissions (metric tons of CO ₂)		4,101*	4,123	Page 38
Emission intensity per €m GGR (location based)	5.1	3.7	1.9	Page 38
Emission intensity per €m GGR (market based)		2.2	1.2	Page 38
Total weight or volume of materials (tonnes)	1,599	1,705*	1,540	Page 39
Total water consumption within the organisation (Megalitres)	73	142*	184	Page 39
Total waste generation (tonnes)	2,043	2,202*	10,193	Page 39
Total recycled waste (%)			62	Page 39
Total non-recycled waste (%)			38	Page 39

* Restatement: see our GRI index on pages 45 and 46.

In 2023, we restated our 2021 and 2022 CO₂ measurements for selected markets. For details on the amounts and reasons behind this restatement, please refer to the table below and our GRI Index on page 46 of this report.

CO₂ 2021-22

Figures restatement

Year	Scope	Old value	Restated value	Difference	Reasoning
2021	1	6,195	5,352	-843	- Wrong reporting of refrigerants in our Austrian market leading to a decrease in Scope 1. - Addition of RES Heat and Cooling figures in our Czech market.
	2 location-based	9,287	9,789	+502	
2022	1	4,544	3,932	-613	- Updated EF factor used for electricity. - Adjusted emission factor and factor for purchased heat at non RES sites. - Change in the calculation of CO₂e based from km driven to actual consumption in litres for our Czech market.
	2 location-based	9,402	9,411	+9	
	2 market-based	3,799	4,101	+302	

GRI index

Allwyn has reported the information cited in this GRI content index for the period 1 January – 31 December 2023 with reference to the 2021 GRI Standards. This index can be used to find key environmental, social and governance (ESG) information, organised by the relevant and most up to date GRI Universal and Topic Standards. This is our first time reporting with reference to the GRI 2021 standards and we expect to report more widely and in depth in the future. Unless otherwise stated in this GRI index, the below figures in the table always include data for Allwyn AG, Allwyn International a.s., Allwyn Services Czech Republic a.s., Allwyn Services UK Ltd, CASAG, Szarka, OPAP, Allwyn UK, Camelot and Allwyn US. Where data for some of these entities have not been included in the figures presented in the table, this information is shown in the 'Notes' column. We believe this is the most appropriate approach for communicating effectively with our stakeholders. The non-financial data refers to the entire year of 2023 despite our acquisitions taking place in February 2023 (UK market) and March 2023 (US market) respectively.

GRI standard	Disclosure	Location	Notes
GRI 2: General Disclosures 2021	2-1 Organizational details	Allwyn 2023 Annual Report; page 55 Allwyn 2023 ESG Report; page 47	
	2-2 Entities included in the organization's sustainability reporting	Allwyn 2023 Annual Report; page 55 Allwyn 2023 ESG Report; pages 9 and 47	
	2-3 Reporting period, frequency and contact point	Allwyn 2023 ESG Report; page 47 and back cover.	
	2-4 Restatements of Information	Allwyn 2023 ESG Report; page 43 GRI Index; GRI 203-1, GRI 301-1, GRI 303-5, GRI 305, GRI 306-3, and GRI 405-1	
	2-5 External Assurance	n/a	This report is not externally assured. We aim to gain external assurance of our sustainability report in the upcoming years to enhance our reporting efforts and align with CSRD requirements.
	2-6 Activities, value chain and other business relationships	Allwyn 2023 ESG Report; pages 6, 7 and 8	
	2-7 Employees	Allwyn 2023 ESG Report; pages 32 and 33	
	2-9 Governance structure and composition	Allwyn 2023 ESG Report; page 16 Allwyn 2023 Annual Report; pages 40-42	
	2-11 Chair of the highest governance body	Allwyn 2023 Annual Report; page 40	
	2-12 Role of the highest governance body in overseeing the management of impacts	Allwyn 2023 ESG Report; page 16	
	2-13 Delegation of responsibility for managing impacts	Allwyn 2023 ESG Report; page 16	
	2-14 Role of the highest governance body in sustainability reporting	Allwyn 2023 ESG Report; page 16	
	2-16 Communication of critical concerns	Allwyn 2023 ESG Report; page 16	
	2-22 Statement on sustainable development strategy	Allwyn 2023 ESG Report; pages 1, 13, and 14.	
	2-23 Policy commitments	Allwyn 2023 ESG Report; page 17	
	2-24 Embedding policy commitments	Allwyn 2023 ESG Report; page 17	
	2-25 Processes to remediate negative impacts	Allwyn 2023 ESG Report; page 20	
	2-26 Mechanisms for seeking advice and raising concerns	Allwyn 2023 ESG Report; page 20	
	2-28 Membership associations	Allwyn 2023 ESG Report; page 2	
	2-29 Approach to stakeholder engagement	Allwyn 2023 ESG Report; pages 12, 23, 28, 31, and 37	

GRI index continued

GRI standard	Disclosure	Location	Notes
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Allwyn 2023 ESG Report; page 12 and 13	
	3-2 List of material topics	Allwyn 2023 ESG Report; page 12	
	3-3 Management of material topics	Allwyn 2023 ESG Report; page 20, 22, 27, 31, and 36	
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Allwyn 2023 ESG Report; page 7	
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Allwyn 2023 Annual Report; page 7	In our ESG Report for 2022 (page 19), we reported our Group total for sponsorships and donations. Starting in 2023, we have discontinued this figure and methodology. For Good Causes contributions in 2023, please see our 2023 Annual Report at page 7. As stated above, social investments have been identified as a material topic in our latest double materiality report. We look forward to reporting more figures in our 2024 ESG Report.
GRI 205: Anti-corruption 2016	205-3 Confirmed incidents of corruption and actions taken	Allwyn 2023 ESG Report; page 42	
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Allwyn 2023 ESG Report; page 42	
GRI 207: Tax 2019	207-2 Tax governance, control, and risk management	Allwyn 2023 Annual Report; pages 43 and 44	
GRI 301: Materials 2016	301-1 Materials used by weight or volume	Allwyn 2023 ESG Report; page 39	2022 figure restated (+22 tonnes compared to 2022 ESG Report). 2023 figure includes limited data from CASAG and excludes Camelot UK.
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Allwyn 2023 ESG Report; page 38	
	302-3 Energy intensity	Allwyn 2023 ESG Report; page 38	
	302-4 Reduction of energy consumption	Allwyn 2023 ESG Report; page 38	
GRI 303: Water and Effluents 2018	303-5 Water consumption	Allwyn 2023 ESG Report; page 39	In our 2022 ESG Report, we reported Group water consumption of 182 megalitres. This figure did not take into account the flow stream cooling system in one of our Austrian venues, whereby water is allowed to flow through the building without being consumed. We have therefore revised the Group total for 2022 to 142 megalitres.

GRI index continued

GRI standard	Disclosure	Location	Notes
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Allwyn 2023 ESG Report; page 38	In 2022, we calculated Scopes 1 and 2 emissions for the first time. As we advance our reporting processes and gather more precise data, we are continuously improving the accuracy of our CO₂ emissions calculations. This ongoing enhancement ensures that our sustainability reporting reflects the most reliable and up-to-date information. Reasons for restatements outlined on page 43 include: • Wrong reporting of refrigerants in our Austrian market leading to a decrease in Scope 1. • Addition of RES Heat and Cooling figures in our Czech market. • Updated EF factor used for electricity. • Adjusted emissions factor and factor for purchased heat at non RED sites. • Change in the calculation of CO₂e based from km driven to actual consumption in litres for our Czech market.
	305-2 Energy indirect (Scope 2) GHG emissions	Allwyn 2023 ESG Report; page 38	
	305-4 GHG emissions intensity	Allwyn 2023 ESG Report; page 38	
	305-5 Reduction of GHG emissions	Allwyn 2023 ESG Report; page 38	
GRI 306: Waste 2020	306-3 Waste generated	Allwyn 2023 ESG Report; page 39	2022 figure restated (+22 tonnes compared with 2022 ESG Report).
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Allwyn 2023 ESG Report; page 42	Figure includes Casinos Austria International.
GRI 403: Occupational Health and Safety 2018	403-6 Promotion of worker health	Allwyn 2023 ESG Report; page 33	
	403-9 Work-related injuries	Allwyn 2023 ESG Report; page 42	
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Allwyn 2023 ESG Report; page 42	
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Allwyn 2023 ESG Report; pages 16, 32, and 42	Our 2022 ESG Report stated incorrect figures for full-time and part-time employees by gender. The report stated a split of 46% full-time, 54% part-time for males and 48% full-time, 52% part-time for females. The correct figures were 80% full-time, 20% part-time for males and 81% full-time, 19% part-time for females. Starting in 2023, we no longer report diversity data by number of FTE employees. Instead, we will report based on headcount only.
GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labelling	Allwyn 2023 ESG Report; pages 23 and 24	
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Allwyn 2023 ESG Report; page 42	

Legal information and glossary

This ESG Report contains “forward-looking statements” within the meaning of the securities laws of certain jurisdictions. In some cases, these forward-looking statements can be identified by the use of forward-looking terminology, including the words “believes”, “estimates”, “anticipates”, “expects”, “intends”, “may”, “will”, “plans”, “continue”, “ongoing”, “potential”, “predict”, “project”, “target”, “seek” or “should”, or in each case, their negative or other variations or comparable terminology or by discussions of strategies, plans, objectives, targets, goals, future events, or intentions. These forward-looking statements include all matters that are not historical facts. They appear in a number of places throughout this ESG Report and include statements regarding our intentions, beliefs or current expectations concerning, among other things, the Group’s ESG strategy, commitments, objectives, and goals.

By their nature, forward-looking statements involve known and unknown risks and uncertainties because they relate to events and depend on circumstances that may or may not occur in the future. Forward-looking statements are not guarantees of future performance. You should not place undue reliance on these forward-looking statements.

Any forward-looking statements are only made as of the date of this ESG Report and the Group does not intend, and does not assume any obligation, to update forward-looking statements set forth in this report.

Many factors may cause results or outcomes of the Group’s ESG strategy, commitments, objectives, and goals to differ materially from those expressed or implied by the forward-looking statements contained in this report.

About this report

This is a report on non-financial information for Allwyn International a.s., a joint stock company incorporated on 2 April 2012 and registered in the Commercial Register maintained by the Municipal Court in Prague, Section B, Insert 18161. The Company’s registered office is at Evropská 866/71, 160 00 Prague 6, Czech Republic and its Identification Number is 242 87 814. The Company’s domicile is the Czech Republic. The immediate parent of Allwyn International a.s. is Allwyn AG, which is registered and headquartered in Switzerland.

Details of the ownership structure of Allwyn International a.s. can be found in the 2023 Annual Report for Allwyn International a.s. on page 55.

This report also considers non-financial information of Allwyn International a.s.’s consolidated operating companies, a list of which can be found in the 2023 Annual Report of Allwyn International a.s., on page 55.

Except where otherwise stated, all non-financial information is given for the full calendar year of 2023. This may lead to an overstatement of certain figures in relation to Camelot UK and Allwyn LS Group, which were only consolidated from 5 February 2023 and 3 March 2023 respectively.

This report covers the period from 1 January 2023 to 31 December 2023, in line with the annual financial reporting period of Allwyn International a.s.

This report’s publication date is 25 June 2024.

In this report, the following terms have the following meanings:

“**Allwyn**” and “**the Group**” refer to Allwyn International a.s. together with its consolidated subsidiaries.

“**Annual Report**” refers to 2023 Annual Report of Allwyn International a.s.

“**Board**” refers to the Board of Directors of Allwyn International a.s. (for details of Board members, see the Annual Report, page 40).

“**ESG Report**” refers to this report.

“**Group functions**” refers to Allwyn International a.s. and its subsidiaries that perform strategic and corporate functions centrally, benefiting our operations across our multi-national footprint.

“**Market**” refers to Allwyn’s operations in a given geographic territory.

“**Allwyn Illinois**” refers to Allwyn Illinois LLC.

“**Allwyn LS Group**” refers together to Allwyn North America Inc. and its subsidiaries, and Allwyn Lottery Solutions Limited (formerly Camelot Global Lottery Solutions Limited).

“**Allwyn North America**” refers to Allwyn North America Inc.

“**Allwyn UK**” refers to Allwyn Entertainment Ltd.

“**Camelot UK**” refers to Camelot UK Lotteries Limited.

“**Casinos Austria International**” refers to Casinos Austria International GmbH together with its subsidiaries.

“**CASAG**” refers to Casinos Austria AG and its subsidiaries.

“**OPAP**” refers to OPAP S.A. and its subsidiaries.

“**SAZKA**” refers to SAZKA a.s.

“**Stoiximan**” refers to Stoiximan Ltd.

Responsibility for reviewing and approving the reported information rests with the Board. On a day-to-day basis, the Chief of Staff & Strategy is responsible for collecting, monitoring, and updating this information from both parent company and market level. The Chief of Staff & Strategy carries out this task under the supervision of the CEO and with the assistance of the broader sustainability group and other departments.

EU Taxonomy

This ESG Report is provided on a voluntary basis as, at the date of publication of the report, no entities at holding company level are subject to obligations governing the disclosure of non-financial and diversity information, including Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investments (EU Taxonomy).

Allwyn International a.s.

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