



# **Code of conduct for suppliers of Loteries de Catalunya**

# Introduction

***Loteries de Catalunya's mission is to maximise the return on net income with the aim of contributing to social cohesion. In addition, we want to do this through a fun, modern, integral and inclusive way of playing, always bearing in mind the impact we have on society.***

To make this possible, Loteries de Catalunya (hereinafter LCAT) bases its daily actions and objectives on sustainability guidelines. For this reason, we expect ethical business practices from our suppliers, whether national or international, while at the same time ensuring that their operations and processes are socially responsible and sustainable.

We select and evaluate our suppliers not only on economic criteria, but expect them to fully comply with applicable laws and to adhere to established environmental, social and corporate governance standards.



**01.**

**Our values**



# Innovation

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*We anticipate trends, see opportunities and introduce change. Our initiatives are pioneering and bring new perspectives marked by evolution, adaptability and improvement.*

# Integrity

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*We act in an honest and transparent manner and ensure strict and ethical compliance in our actions. We always treat our players with respect and observe the strictest principles of responsible gambling.*



# Proximity

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*We work for the people who live in Catalonia. We are local and close, we know our country and we want to be worthy of its maximum social recognition.*

# Social responsibility

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*We understand that collective enjoyment takes priority over individual profit. We want to be an engine of solidarity and a generator of the common good for the country.*



**02.**

**Expectations**






***This Code of Conduct describes our expectations during the term of the contractual relationship, which are essential to initiate or expand business relationships, respecting the workplace standards and business practices of our suppliers, together with their parent entities, subsidiaries, affiliates, subcontractors and others within their organizational structure.***

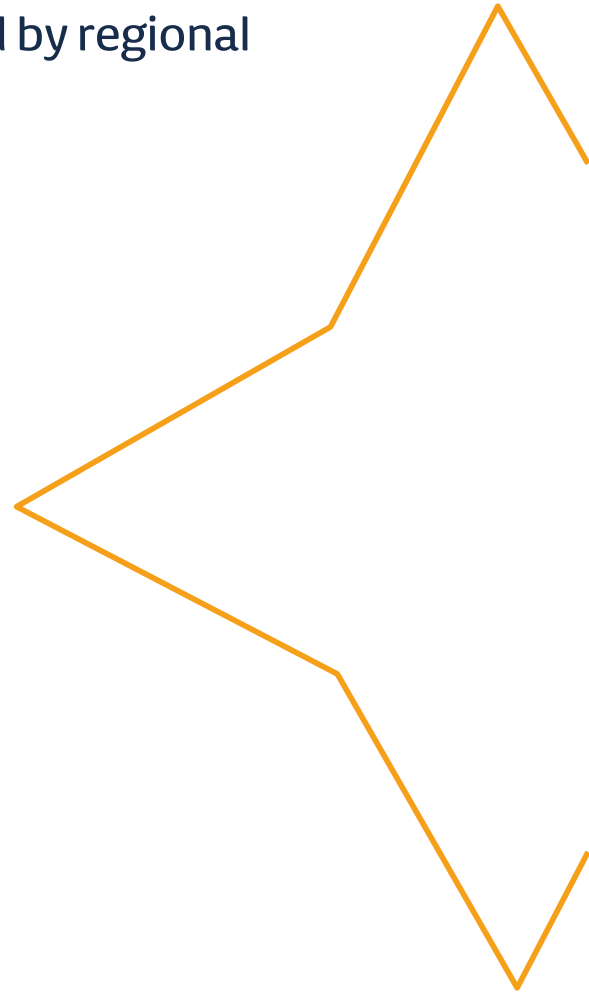
The expectations outlined in this Code are not a substitute for specific requirements contained in contracts, but are intended to supplement them. If a contractual term is more stringent than those in this Code of Conduct, the supplier must comply with the more stringent contractual requirement.

Each supplier is responsible for ensuring that its employees, representatives and subcontractors understand and comply with these guidelines.



# Diversity and inclusion

***It is LCAT's policy to provide*** recruitment opportunities regardless of place of birth, race, sex, religion, opinion or any other personal or social condition or circumstance protected by regional and state laws.





# Business ethics and compliance

LCAT rejects any action or omission that is related directly or indirectly to acts of corruption, bribery or money laundering. It will only accept actions that are in line with current regulations, regardless of the economic or other benefits they may entail.

*For this reason, and always within the scope of the current contract with LCAT:*

## 01.

The supplier must have in place, in accordance with the legislation in force, where appropriate, adequate means for the prevention of money laundering and terrorist financing.

## 02.

The supplier must not accept or offer free gifts, advantages, favours or arrangements intended to improperly influence his business, professional or administrative relations.

## 03.

The supplier must avoid incurring in situations of actual or potential conflict of interest of its employees and those of LCAT, and must maintain mechanisms that, in case of potential conflict of interest, guarantee the independence of the supplier's actions. Any person affected by the conflict of interest must refrain from intervening or participating in the negotiation in question.

## 04.

The supplier must protect and respect all intellectual and industrial property rights of LCAT. The supplier may not use in any way LCAT's trademarks, logos and trade names, internet domain names, or any other distinctive signs of LCAT, without the express written consent of LCAT.

# Human rights and labour practices

LCAT expects its suppliers to share its commitment to promote and respect human rights and equal opportunity in the workplace. As such, they are expected to conduct their labour practices in full compliance with all applicable laws and regulations, including, but not limited to:

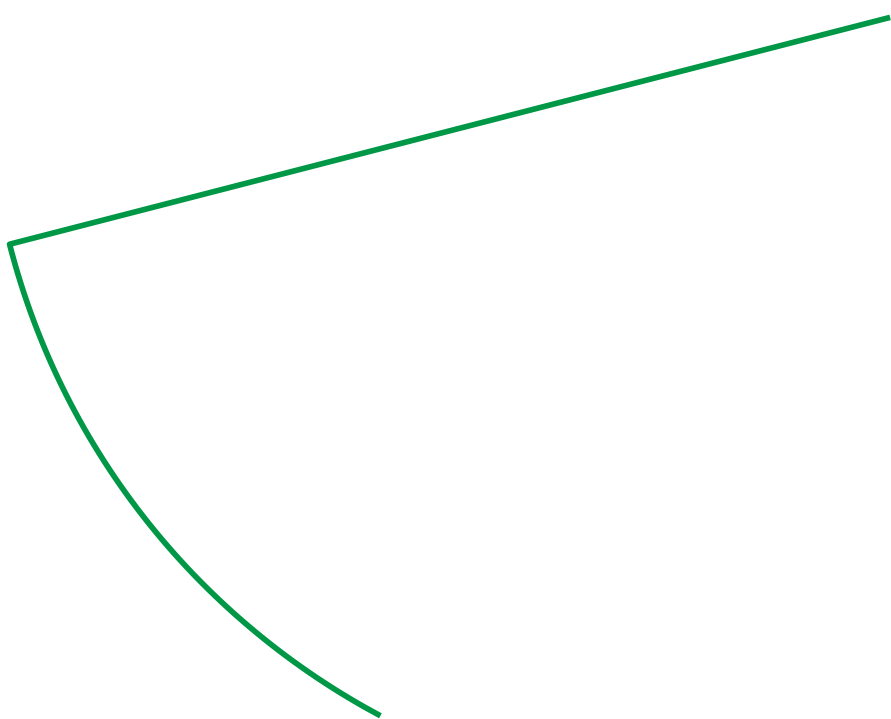
- ***The supplier may not employ children under 16 years of age.***
- ***Harassment and non-discrimination:*** The supplier is expected to keep its workplaces free from harassment, abuse, violence, intimidation, corporal punishment, physical or mental coercion, verbal abuse and discrimination.
- ***Working hours and wages:*** The supplier must comply with national laws and regulations regarding working hours, wages and benefits.
- ***Freedom of association and collective bargaining:*** The supplier must allow its employees freedom of association and collective bargaining in accordance with applicable laws and regulations.



# Environmental protection

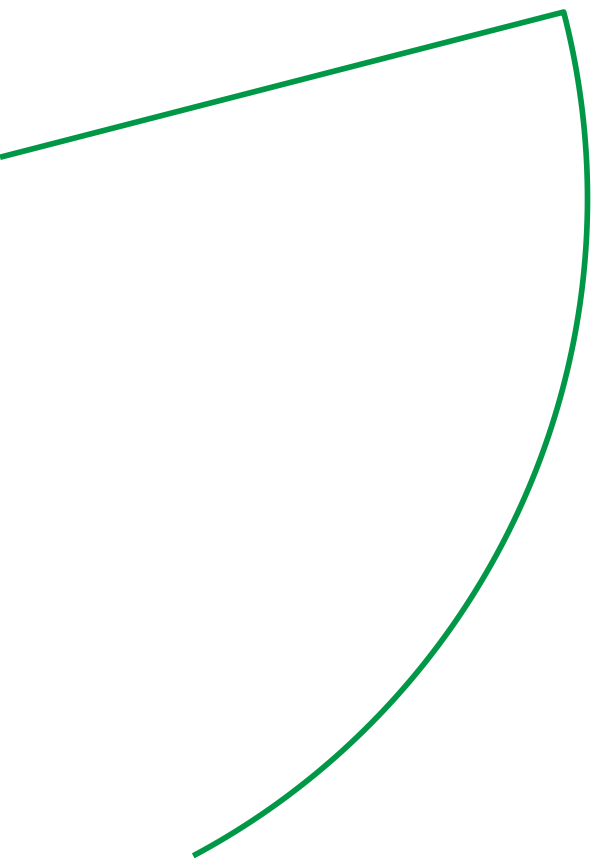
***The supplier shall comply with all applicable environmental laws, regulations and standards and implement an effective system to identify and eliminate potential hazards to the environment.***

The supplier shall work to continuously improve its environmental management systems and shall apply the principles of reduce, reuse and recycle, and shall strive to reduce its consumption of energy and resources, as well as the waste and emissions it generates.



# Health and safety

***The supplier shall ensure that its workers are provided with safe, adequate and hygienic working facilities.*** The supplier must have effective health and safety prevention and remediation policies and procedures that comply with industry, national and international laws and regulations. The supplier must provide employees and its own suppliers and subcontractors with the necessary protective equipment and training to perform their tasks safely.



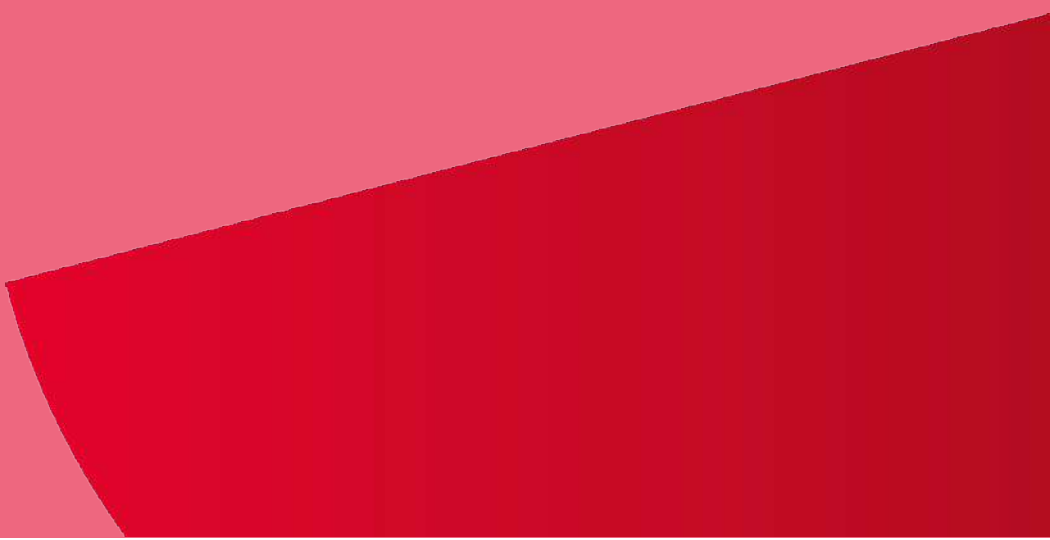
# Confidential information


*The LCAT provider must ensure the protection of all sensitive information*, such as confidential personal information, which is to be used for business purposes only. For all electronically transferred information, the provider is expected to implement appropriate security mechanisms and systems and to notify LCAT of any actual or suspected data breaches. In addition, LCAT expects the provider to protect LCAT information from unauthorized access, destruction, changes, use and disclosure.



**03.**

**Compliance with  
the Code of  
Conduct**





***If instances of non-compliance with the Code of Conduct are detected during the term of the contractual relationship, ways and means will be developed to remedy the non-compliance, and also in non-minor procurement, in accordance with the tender documents, provided that LCAT receives a commitment from the supplier to correct the non-compliance within due time.***

The supplier must immediately inform its LCAT contact when situations arise that lead it to operate in violation of this Code of Conduct.

*Compliment Normatiu de LCAT* is the department responsible for receiving both communications and queries about the application of this Code and for managing them in relation to the interests and needs of LCAT. For this purpose, the required standards of integrity and confidentiality will be applied.

*If you have any concerns or questions about the content of this document, you can send your questions to ***juridic@loteries.cat***.*





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