



# Sustainability report 2022



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This document constitutes the statement of non-financial information (Estado de Información No Financiera, EINF) of the Company CIRSA ENTERPRISES, S.L. and its consolidated group of companies that comprise it (see annex). This EINF has been prepared to comply with the provisions of Law 11/2018 of 28 December 2018. The information contained in the EINF, although presented in a separate document, is part of the Consolidated Management Report of the CIRSA group. The European Commission's non-financial reporting guidelines (2017/C 215/01) derived from Directive 2014/95/EU and the Global Reporting Initiative Standards (GRI Standards) have been considered in its preparation.

Sustainability is at  
the heart of our growth





## Message from the Chairman

Joaquim Agut  
Executive Chairman of CIRSA

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The progressive integration of ESG criteria into our business model remains a strong priority and goal. CIRSA's business strategy revolves around a global vision of sustainability that seeks to create long-term value for our local communities, customers, employees and shareholders.

We have extensive experience in the allocation of human, technical and financial resources towards sustainability management and we are fully committed to demonstrating that business success and creating value for stakeholders always go hand in hand. We know that our company's competitiveness and the progress of the communities in which we work are closely related. That is why we dedicate great effort to creating social value for these communities, which generates benefits for both society as a whole and for the company.

As a demonstration of the commitment and alignment of our organisation with developing and executing our sustainability strategy, we have formed an **ESG Committee**. It is under my supervision, it meets every quarter and is comprised of the director of Sustainability and the leaders of each of the ESG areas, all of whom have more than ten years of experience in their respective duties. We have also linked

### **our team's annual variable remuneration to meeting ESG goals.**

This report describes our ESG goals, actions and performance during the 2022 period and is structured into **four blocks**: firstly, **Responsible Gaming**, as a differentiated dimension that reflects the focus of our efforts and at the same time the main concern of our stakeholders, as demonstrated in the materiality assessment carried out. Then come the three ESG dimensions (**environmental, social and governance**).

Based on this scheme, one of the most important achievements of 2022 has been the **Responsible Gaming certification** by the international entity **Global Gambling Guidance Group (G4)**. In fact, making our customers feel safe while they bet is the foundation and guarantee of our business sustainability strategy. That's why training our people on this is an essential pillar of our policy. Likewise, we have increased by 22% the establishments (compared with 2021) that have received the Responsible Gaming certificate. We have simultaneously launched the campaign "**At CIRSA, We Are Responsible Gaming**", which consists of informing and training our customers, among other things.

AT CIRSA  
**WE ARE ESG**

In the **environmental area**, we prioritise reducing the impact of our activities by applying technological improvements to help us streamline operations, increase our competitiveness and promote sustainable profitability over time. As an example, **66% of our global energy consumption already comes from renewable sources.**

During the year, we have continued to promote our **“Green Hall”** project to ensure that environmental best practices are implemented in all our gaming halls.

With regard to the **social sphere**, it is a priority for us to know the potential growth of each of our team members, so that we can devote the necessary resources to their training and development. In addition, we maintain a strong commitment to fostering a diverse environment that values and recognises differences of all types. **Diversity, inclusion and equality** are key aspects in this area. For us, they are intangible values and accelerators of our growth and in providing value to society as a whole.

I am also proud to highlight our **ongoing commitment to our local communities**, a unique value that CIRSA has made present at all levels of the organisation and integrated into different internal strategies, operations and policies.

In this sense, for example, practically our entire team comes from the local communities where we operate. Gaming and business taxes there have contributed **€662 million to the socio-economic development** of the countries where we are present.

On the other hand, our commitment to only **operating in regulated markets** together with strict compliance, ethics and integrity – as defined in our demanding Corporate Governance model – has earned us **a great reputation and prestige in the sector and in the business world in general.**

Finally, I am pleased to announce that we have recently adhered to **the United Nations Global Compact.**

Rest assured that we will continue to focus our efforts on developing and expanding our Responsible Gaming policies. This is aimed at ensuring the wellbeing of our employees, fostering a more inclusive society, promoting positive change in our local communities and reducing our environmental impact, all of which ultimately **creates sustainable value.**



## 2. About this report

# ESG criteria



Our communication strategy is based on ensuring the transparency of our activities. In the light of this **commitment**, we provide our stakeholders with the most complete information on our ESG strategy, goals and the results obtained.



In line with this **commitment**, we are publishing our report on **ESG (responsible gaming, environmental, social environment and corporate governance) criteria** for 2022, where we report on our progress in environmental, social and governance matters.

This document is also an exercise in transparency. It aims to inform our stakeholders of the Group's progress in the field of sustainability, both internally and externally.

In order to facilitate the reader's understanding of the evolution of our business from its origin, we also include figures and milestones related to previous years.

To prepare this report, we have followed a broad and rigorous process that implements a system for the definition, measurement, management and reporting of each KPI (key performance indicator) in the **nine countries in which we are present**. The data included has been verified at three levels: data preparation and reporting by the ESG team, a check by finance and monitoring and then a review by internal auditing. In addition, its content includes a **materiality analysis and assessment**, helping us to delve into aspects of the ESG criteria most relevant to our company and our stakeholders.

This ESG report reflects all areas related to these criteria, which we have a responsibility to deal with as a leader in the gaming industry. We want to

explain how we, at CIRSA, manage the risks and opportunities related to social, environmental and governance issues.

Its structure focuses on the relevant aspects necessary to understand CIRSA's business development, as well as its market position and the development of the ESG criteria. We explain each of their purpose, strategy and performance.

We start with the core of this ESG report, which is Responsible Gaming. Then we move on to the environmental and social aspects of our business, which are divided into two sections: our people and our contribution to society. Finally, we discuss compliance and corporate governance.

This **report has been reviewed and approved by the Chairman of the Company** and covers the CIRSA Group's activities on both a national and international level. It includes initiatives and performance metrics from our global operations **between 1 January and 31 December 2022**, coinciding with the reporting period for the Group's **financial information**.

The contents included in this report are supplemented by the rest of the publications and information available on our corporate website, [www.cirsa.com](http://www.cirsa.com)

**This report was published on 24 May 2023.**

# Materiality assessment and matrix

As a demonstration of our commitment to sustainability and using it as a strategic tool, this financial year we performed our first materiality assessment.

The purpose of this study is to identify and prioritise the most relevant aspects for the Company, based on an analysis of its impact on its environmental and socioeconomic environment. These aspects have been classified following the ESG perspective.

The analysis was performed with the reference point being the **Global Reporting Initiative (GRI)**, in its standard "GRI 3: Material topics", as well as what is defined in the draft ESRS (European Sustainability Reporting Standards) regarding the materiality assessments of companies. This financial year lays the groundwork for future **dual materiality assessments**, which will be addressed by the Company in future financial years by incorporating this analysis into its financial perspective.

The proposal to involve the Company's main stakeholders in the analysis is a key piece of the process, which has been structured as follows:

## 1.

### Context of the industry and business model analysis

In the first phase of the work, a context analysis was carried out of the sector in which CIRSA operates, in addition to the company's business model. This allowed us to more closely analyse the most relevant ESG topics.

The issues discussed include:

- Trends in the business model and in sustainability, through the study of sector reports or other sources.
- Benchmark of industry competitors.
- ESG analysts and *frameworks* (MSCI, SASB, etc.).

To achieve a comprehensive outcome of the Company's impacts, the focus has been placed on each of its lines of business on an individualised basis. Understanding the particularities of each of the Company's activities has made the analysis more accurate. Below are the areas analyzed:



Casinos



Online gaming and betting



Operation of slot machines Spain



Operation of slot machines Italy

## 2.

### Identification of impacts and material issues

Subsequently, we carried out a detailed analysis of each of the Company's lines of business and their respective activities.

In this phase of the work, internal meetings were held with managers from different business areas in order to correctly identify CIRSA's main impacts. The result is a list of 59 impacts, both positive and negative, current and potential.

Together with these key Company employees, we were also able to identify the **Scope, Probability and Remediability** of these impacts.

To complete the analysis and facilitate its understanding, impacts have been classified by ESG topics, which in turn correspond to the three sustainability verticals: Environmental, Social and Governance (ESG).

#### Environmental topics (E)



Energy consumption



Greenhouse Gas Emissions (GHG)



Water consumption and management



Resource use



Waste management and circular economy

#### Social topics (S)



Talent management and working conditions



Health and safety



Value chain employees



Equality, diversity and inclusion



Safe gaming



Impact on local communities



Relationship with consumers

#### Governance topics (G)



Business ethics and governance



Corruption, bribery and money laundering



Digitisation and innovation



Cybersecurity and data processing

# 3.

## Impact prioritisation

The impact assessment has been carried out using a methodology that has combined their scope, probability and remediability, as well as their internal and external relevance.

As an essential part of the process, we have involved the Company's main stakeholders, both internal and external, using the most appropriate method for each one, carrying out a total of more than 50 interviews and questionnaires.

- **Internal stakeholders:** impact assessment through interviews and questionnaires given to the Sustainability department, executives and employees.
- **External stakeholders:** impact assessment through interviews and questionnaires with customers, suppliers and industry associations.

### Internal stakeholders



#### Executives

Prioritising topics through interviews



#### Employees

Prioritising topics through questionnaires

### External stakeholders



#### Industry associations

Prioritising topics through interviews



#### Customers

Prioritising topics through Interviews



#### Suppliers

Prioritising topics through interviews

# 4.

## Data processing and results

Finally, the information obtained after consultations with stakeholders has been collected and processed, identifying the main topics linked to each of the identified impacts.

The result of this final part of the process is a list of the impacts and ESG issues that are most relevant for the Company, in the light of their scope, probability and remediability, as well as the scale of importance granted to it by its stakeholders.

The results have been validated by CIRSA management, who have played a critical role in the process.

The matrix includes a prioritization of the most relevant ESG issues for CIRSA. That identification stems from the impact analysis that the Company carried out.

In the assessment, the scope, probability and remediability of the impacts have been considered, as well as the assessments assigned by the stakeholders participating in the consultation process.

As a result, we identified 16 topics relevant to the Company, which in turn have been classified as very high, high and medium level of importance, as represented in the following matrix:



- |                  |   |               |  |
|------------------|---|---------------|--|
| Very high impact | <ul style="list-style-type: none"> <li>1. Safe gaming</li> <li>2. Cybersecurity and data processing</li> <li>3. Corruption, bribery and money laundering</li> <li>4. Impact on local communities</li> <li>5. Talent management and working conditions</li> <li>6. Occupational health and safety</li> </ul> | Medium impact | <ul style="list-style-type: none"> <li>13. Resource use</li> <li>14. Business ethics and governance</li> <li>15. Relationship with consumers</li> <li>16. Water consumption and management</li> </ul>  |
|                  | High impact   |               | <ul style="list-style-type: none"> <li>7. Value chain employees</li> <li>8. Equality, diversity and inclusion</li> <li>9. Power consumption</li> <li>10. Greenhouse gas (GHG) emissions</li> <li>11. Digitisation and innovation</li> <li>12. Waste management and circular economy</li> </ul> |

Once the material topics have been analysed, this report provides information throughout its text regarding the high-priority topics, as defined by CIRSA, after their materiality assessment.

### 3. About us

CIRSA is an international gaming company that has led the markets where it has a presence since 1978



CIRSA

The image shows the exterior of a building with a large, three-dimensional logo for CIRSA. The letters 'CIRSA' are in a dark grey, bold, sans-serif font. To the right of the letters is a stylized yellow apple icon with a green leaf. Below the main logo, there is a smaller, circular logo featuring a stylized apple.

# Our business activity

## What we do

**CIRSA is a leading multinational recreational gaming and betting company operating in Spain and Latin America. It began its activity in 1978 in Spain. Since then, from our position as a leader in our markets, we have expanded to Latin America, Italy and Morocco.**

We offer the widest range of products and services in the gaming industry, from the design and manufacture of slot machines and software to the management of slot machines, casinos and sports betting.

More than 13,000 people work at CIRSA, which has more than 500 premises in nine countries. Our activity takes place both in our casinos and in third-party premises.

As of this year, we have **four main business units:**



### Casinos

Under the casinos business we are including all our retail gaming offer through own managed halls which includes in all cases a wide variety of slot machines, electronic roulettes together with other electronic games and F&B/shows, to which gaming tables (and in a few cases traditional bingo) are added on a premise by premise basis.



### Online gaming and betting

Our online gaming offering includes sports betting, casino games and social games. These services are primarily offered under the Sportium and E-Play24 brand. In addition, we manage sports bets in gaming halls and bars that allow us to offer an omnichannel entertainment experience to all our customers.



### Operation of slot machines Spain

Operation of slot machines (AWP) in bars, cafes and restaurants. Additionally, the B2B business unit designs, manufactures and markets slot machines for the Spanish market. This business unit also develops and markets software to manage casinos and gaming halls. The full range of products and services is distributed to the Group and other companies.



### Operation of slot machines Italy

Operation of slot machines (AWP) in bars, cafes, restaurants, gaming halls and traditional bingos.

## Market position

We are a leading multinational company in the recreational gaming and betting sector in Spain and Latin America, not only in terms of market share, but also as a leading company recognised for its creativity, innovation, professionalism, diversity, service and turnover.

Since our inception in 1978, we have delivered bespoke solutions and the best products and services to our markets and customers. Unlike online companies and industry start-ups, CIRSA has been in every one of its markets for decades where we have always renewed our licences and concessions when they expire. Not only has this given us a leadership position in terms of market share, but it has also generated a proven and enduring commitment to the highest standards of professional ethics and regulatory compliance in every country in which we have a presence. This has been widely recognised by policymakers, customers and other stakeholders. Here are the most relevant milestones:



As a Group, we strive to maximise our efficiency and productivity while developing and consolidating profitable growth through well-executed, robust investment plans. The current management team joined CIRSA in July 2006. Since then, it has always met all of its commitments. In July 2018, Blackstone acquired a majority share in CIRSA, contributing to the development of our strategy with its deep knowledge and weight in the financial markets. We also published our **first ESG report** and obtained the **international G4 certification** in 2022 and recently adhered to the **United Nations Global Compact**.

We strive to maximise our efficiency and productivity while developing and consolidating profitable growth through robust investment plans, supported by a diverse and sustainable business strategy.

<p><b>+</b> profitable growth, business consolidation and selective acquisitions</p>	<p><b>+</b> unique diversification by region and business segment</p>
<p><b>+</b> developing a sustainable and successful multichannel business model</p>	<p><b>+</b> achieving a strong leadership position in the different markets in which we are present</p>

# CIRSA's numbers

As of 31 December 2022, we manage 430 casinos, 78,722 slot machines and 621 gaming tables. We have received more than 50 million visitors per year and have hosted nearly 6,500 events.

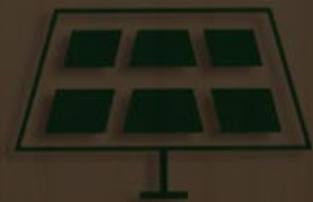
CIRSA currently operates in **nine countries**, where there is regulation:



# ESG at a glance



**ESG**



# ESG commitment and goals

Since its founding in 1978, the implementation of CIRSA's strategy has been guided by sustainability and aligned with the United Nations Sustainable Development Goals, to which we are firmly committed.

**We have recently adhered to the United Nations Global Compact as a further step in our strategy and alignment with the principles of responsible management and sustainability of the international bodies.**



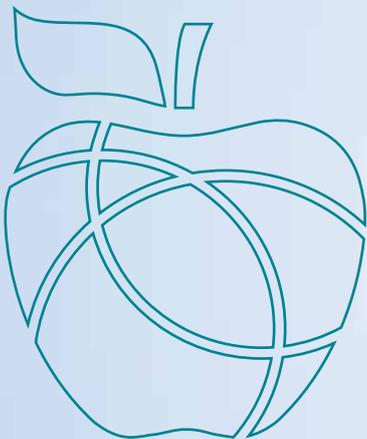
To address material issues, we focus on **four areas** of action where we can make a greater contribution: **Responsible Gaming, the environment, the social environment** (CIRSA team and our contribution to society), and finally, **corporate governance** and regulatory compliance.

The short/medium term strategic priorities for sustainability are to continue with:

- Responsible Gaming policies, measures and training.
- Ensure regulatory compliance, working exclusively in regulated markets.
- Foster diverse and safety work environments.
- Consolidate our commitment to the local communities where we operate.
- Reduce environmental impact by opting for renewable energy and technological improvements.

The Company has assembled the necessary human and technical resources to properly manage all four areas, extending its values to its suppliers and the rest of agents that make up its value chain.

At CIRSA, we ensure the integration of ESG criteria into our internal processes, such as decision-making and risk analysis in internal operations and investments, as well as in supply chain management or other processes that may involve any type of environmental, energy or climate-related impact.



# Responsible Gaming

We are committed to providing the best recreational gaming options to our customers responsibly, striving to make safe, Responsible Gaming the norm in every country where we operate.



Goal	Description
Ensure that 90% of establishments are certified in Responsible Gaming	We want to ensure a safe space at our points of sale (bars and restaurants). We are committed to achieving a 90% Responsible Gaming certification rate for establishments where we operate slot machines by the end of 2024.
Ensure that 100% of our business employees are trained in Responsible Gaming	We want all of our employees to receive Responsible Gaming training. That's why we have set a goal to train 100% of our people globally by the end of 2023.

# Environment

Based on the principles that support our business strategy, a common factor in our locations is their low environmental impact, achieved through the integration of environmental responsibility criteria into their respective design processes.



Goal	Description
Reducing GHG emissions by 65% voluntarily in the medium and long term	Our goal is to reduce greenhouse gas emissions by 65% by 2030, compared to 2022 emissions level.
Achieve 95% renewable energy consumption	We want to achieve 95% renewable energy consumption by 2030.

## Social

The people who are part of our Company are our most valuable asset and a key part of our business success. We follow a culture model that is employee-centred and based on excellence – it is our core value.



Goal	Description
Increase the average impact of training per employee to 40%	This year, each employee took at least four courses, compared to 2021, representing more than 30%, which is in line with the goal set for 2023 (40%).
Maintain the link between internal promotion and recruiting above 90%	We are committed to keeping the link between internal promotion and hiring above 90% to ensure our employees have sufficient growth opportunities.
Ensure more than 50% women in gaming halls management positions	One of the most important positions in our organisation is the management of gaming halls. We are committed to increasing the percentage of women in this role to exceed 50% by 2030.

## Contribution to society

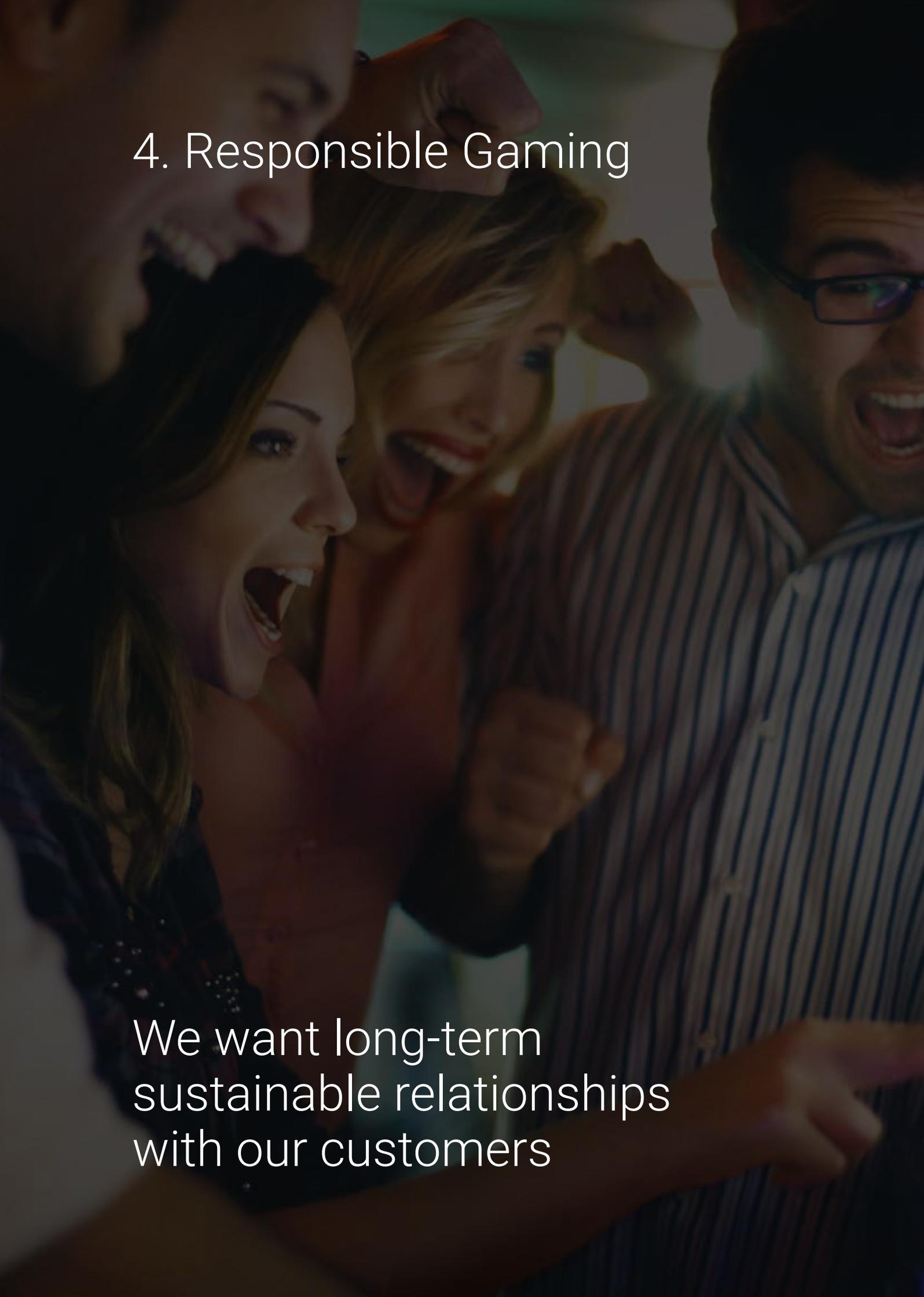
CIRSA is committed to working only in regulated markets through local companies, in order to contribute to the development of communities where we have a presence, and we do this by means of paying taxes on gaming and corporate activity (€662 million).



## Corporate Governance

Our commitment to regulatory compliance, security and privacy of information are factors that allow us to be one of the industry's leading companies and a benchmark at the enterprise level. We encourage honest and ethical behaviour that entails not hesitating in avoiding and rejecting any form of corruption.



A group of people, including a woman in the foreground and a man with glasses on the right, are shown in a state of excitement and celebration. They have their mouths open as if shouting or cheering, and their hands are raised in the air. The background is slightly blurred, suggesting an indoor setting like a bar or a game room. The overall mood is one of joy and shared success.

## 4. Responsible Gaming

We want long-term  
sustainable relationships  
with our customers

# Goal and strategy



At CIRSA, we want to ensure a friendly and personalised recreational gaming experience. That's why we make every effort to ensure that each and every person uses our services in a safe and responsible manner.

We understand that Responsible Gaming involves making assertive and informed decisions for the sole purpose of seeking entertainment and under no circumstances should gaming be used to address economic or emotional problems.

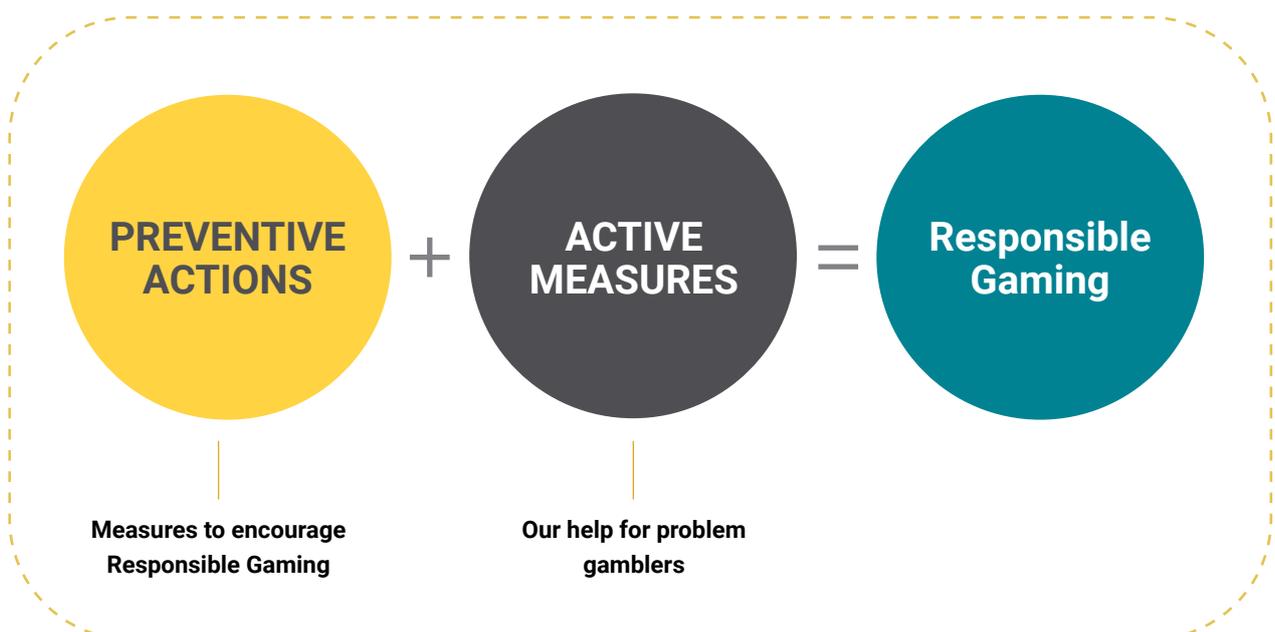
We work continuously to make our business safer and in line with **best practices in Responsible Gaming**. We strive to build long-term sustainable relationships with our customers by providing them with the best experience based on safety and entertainment.

Gaming can offer an alternative way to improve emotional wellbeing by benefiting the social environment and positively contributing to personal interactions. However, while the majority of the adult population enjoys this type of entertainment in a safe and responsible way as part of their leisure activities, we are fully aware that there is a certain minority of users who, for various reasons, may

experience problems. In Spain, for example, this figure remains around 0.3% of the total population of legal age over the last few years. *Source: The Spanish Directorate General for the Regulation of Gambling (Dirección General de Ordenación del Juego, DGOJ) – Gaming and Society*

We offer our customers tools to responsibly manage their experience in our establishments, as well as offering the resources necessary to meet the challenges posed by a fast-growing sector, such as online gaming.

Thus, we believe that it is vitally important that our Responsible Gaming strategy encompasses both physical and online gaming. That is why we take a dual approach that combines both preventive and proactive phases to create a true culture of Responsible Gaming that reaches all of our customers.





Gaming responsibly and safely is a key part of the sustainability of our business. To do this, it is vitally important to empower and protect our customers and train our employees in Responsible Gaming.

### Preventive measures: measures to foster Responsible Gaming

- We launched the **“At CIRSA, We Are Responsible Gaming”** campaign.
- **Training and awareness** campaigns to encourage safer gaming in our culture and to offer our staff the right training.
- With regard to online gaming, we are making large **investments in artificial intelligence** to carefully monitor customers who interact with us and identify potential problematic behaviours, as well as offering tools that allow them to keep control.
- We work to continue to raise awareness of our customers in relation to safe and balanced gaming in all countries in which CIRSA operates, facilitating Responsible Gaming and reporting potential gaming-related harm through a strategic Responsible Gaming communication plan.

### Active actions: our help for problem gamblers

- We encourage active collaborations and partnerships with research institutions to provide assistance and guidance to people who have developed gambling problems.
- We actively participate in all **industry associations in the gaming sector** to foster these commitments and work on specific measures that ensure the highest levels of Responsible Gaming within our industry.
- We also collaborate with public administrations. **For example, in Spain, we are part of the Responsible Gaming Advisory Council**, led by the Directorate General for the Regulation of Gambling (Dirección General de Ordenación del Juego, DGOJ).

CIRSA has obtained the Certification of Responsible Gaming from the international accreditation entity G4



# Actions and results

## Our preventive measures to foster Responsible Gaming



### Certification of Responsible Gaming from the G4 certifying entity

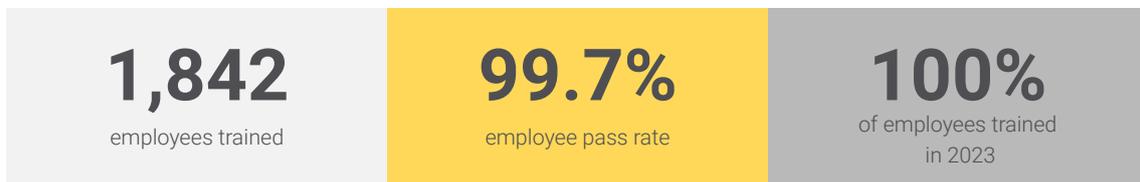
At the corporate level, we obtained a Responsible Gaming certification from the international certifying entity G4 (Global Gambling Guidance Group), becoming the **first group to obtain this accreditation in Spain and in the countries of Latin America** where it is present.

This certification recognises Responsible Gaming policies and action plans for both in-person and online gaming. The Responsible Gaming code of practice for which the CIRSA Group has been certified includes practices and policies that support a Responsible Gaming framework; a specific code for regulating advertising and marketing; and internal Responsible Gaming training plans or customer protection tools to enable the gaming experience to be one of true entertainment, among other matters.

### Responsible Gaming training for our employees

At the end of 2022, a total of 1,842 employees of gaming halls in Spain who are in contact with customers **had completed the Responsible Gaming training**, 1,836 of them successfully passed the training, leading to a 99.7% pass rate.

The goal is to be able to train all employees in the rest of the countries by the end of 2023 and to start a second training for employees in Spain, taking a deeper dive into certain subjects.



### Establishment of the Responsible Gaming Committee

The Corporate Responsible Gaming Committee is **in charge of validating the policies, strategy and culture regarding responsible gaming**. This committee is made up of the heads of the various lines of business, as well as HR, Legal, Communications and ESG.

The main functions of the committee are:

- Define and periodically review the Company's strategy and action plan on Responsible Gaming.
- Meet periodically to evaluate the actions and/or activities to be carried out within the Company, to keep customers informed about Responsible Gaming.
- Develop information campaigns on Responsible Gaming and design campaigns to generate a culture of Responsible Gaming.
- Be aware of the provisions issued by the Responsible Gaming Control Entities, so that the alerts and controls to be implemented in CIRSA are identified in a timely manner.

## At CIRSA, We Are Responsible Gaming

We have launched a global campaign, in all the countries where we have a presence, for internal and external communication with the aim of informing and empowering our customers.

This has been implemented in a visible way in all of our halls. We also make other responsible gaming tips available, including pamphlets, screens and information panels, self-assessment tests and explicit prohibition of access to under 18 years.

Below are some of the elements implemented:

Campaign pamphlet



Placing stickers on slot machines

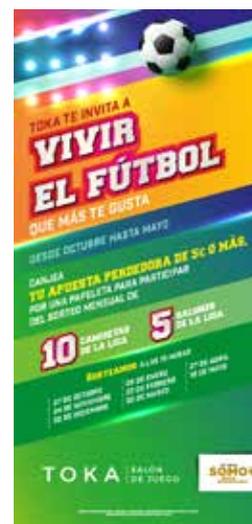


## AT CIRSA WE ARE RESPONSIBLE GAMING

Campaign stickers



Promotional items



If it's safe, it's our game  
 Have fun! Play responsibly  
 Gaming is a playful, fun and social activity  
**At CIRSA, We Are Responsible Gaming**

Awareness-raising actions

**HAVE FUN!  
 PLAY RESPONSIBLY**

---

**+18** **If you are a minor or legally incapacitated, you cannot play**

---

 Depending on your circumstances, calculate the money and time you want to spend on entertainment and keep to that limit for the entire gaming session. **Schedule breaks during games.**

---

 **The only purpose of the game is to have fun**  
 Winning should not be your motivation for gambling

---

 **Always go to authorised gaming establishments.**

---

 **Don't play to evade problems** as moments of emotional conflict diminish your self-control.

---

 **Gaming should not affect your personal relationships** - if it does, it could be a symptom of a gambling problem.

---

 **Play within your financial means.**

---

 **Combine gaming with other forms of entertainment.**

Self-assessment test:

We make a self-assessment test available to customers who request it.

**RESPONSIBLE GAMING TEST AND THE PREVENTION OF ADDICTIVE GAMBLING BEHAVIOUR**

- Do you often find yourself remembering past gambling experiences, planning the next time you're going to play, and/or considering ways to get money to play with?  
 Si  
 No
- Have you ever played with more money than you had intended?  
 Si  
 No
- Do you try to control, interrupt, or stop the game?  
 Si  
 No
- Does the attempt to interrupt or stop the game cause you to be restless or irritable?  
 Si  
 No
- Do you gamble to get away from any problems?  
 Si  
 No
- When you gamble your money away, do you play again to make up the lost money?  
 Si  
 No
- Do you think you have any problems with gambling?  
 Si  
 No
- Do you fund your gambling activity through family money, loans, counterfeit, fraud or theft?  
 Si  
 No
- Have you ever lost work or class time because of gambling?  
 Si  
 No
- Have you ever gone to someone to help you with your financial problems caused by gambling?  
 Si  
 No



Marbella Casino



Valencia Casino

## Responsible Gaming certifications in the bars and restaurants sector

The operation of slot machines in hospitality establishments represents a fundamental asset for our company. For this reason, and as part of our promotion of the culture of Responsible Gaming in the sector, CIRSA and other leading gaming companies in Spain, together with COFAR (Confederación Española de Empresarios del Juego Recreativo en Hostelería [Spanish Confederation of Recreational Gaming Business Owners in Hospitality]) defined a certification programme to ensure that the bars and restaurants sector implemented personalised preventive and proactive measures to ensure safer gaming.

# 12,425

establishments certified in Responsible Gaming in 2022.

This represents 72% of the total, in line with the goal of achieving 90% by 2024.

+22%  
vs 2021

Establishments accredited by this programme publicly show their commitment to providing safe gaming products and ensuring that the activity is conducted under strict regulatory compliance.



SOCIAL  
RESPONSIBILITY  
ACCREDITATION  
PROGRAMME

The correct application of the programme has been validated by SGS, one of the world's leading certification companies, and it has placed us with a rating of **89.02 out of 100**, better than the industry average (86.95).

The methodology used has been to **carry out a questionnaire**, through unannounced audits at the establishments, based on **3 aspects**:

- regulatory aspects
- risk prevention and best practices
- visual and documentary aspects

# 89.02

rating

The SGS logo, consisting of the letters "SGS" in a bold, sans-serif font, with a vertical line to the right of the letters.

The purpose of the verification carried out by SGS was to validate that the establishments comply under the three aspects with the following principles:

1. Provide a safe and regulated environment for hospitality customers.
2. Ensure close supervision by experts, who ensure that gaming is carried out within an appropriate regulatory framework.
3. Grant access only to customers of legal age.
4. Protect vulnerable groups from potential gambling problems.
5. Apply responsible measures to help customers who may develop gambling problems.
6. Fully inform customers about what gambling involves.

## Use AI to address potential gambling problems

It is clear that the world of online gaming will continue to gain popularity in the near future as technological developments facilitate a more engaging experience. Therefore, we want to ensure a secure online gaming environment so that customers can make the most of their experience.

To achieve this goal, we apply AI technologies, specifically the computational model known as the "supervised artificial neural network" to monitor, detect and profile our customers, allowing us to protect them by identifying potential gambling problems. The control mechanisms are based on a matrix that includes 25 key indicators that refer to different elements present in the user's gaming operations. The system monitors different parameters:

- **Frequency/time:** the individual's hourly dedication to gambling-related activities. Among others, it takes into account their days of activity, times between deposits, average hours between logins, etc.

- **Activity/volume:** game style, betting amounts and player casino sessions, as well as weekly deposits and withdrawals, among others.

- **Economic:** monetary amounts devoted to the activity. This includes, for example: deposits totals, weekly average, number of logins resulting in a zero balance, etc.

- **Other factors:** several additional qualitative factors. For example, if the person is of an at-risk (young adult) age, uses their mobile phone or has been previously excluded (has at one point acknowledged that they have a problem).

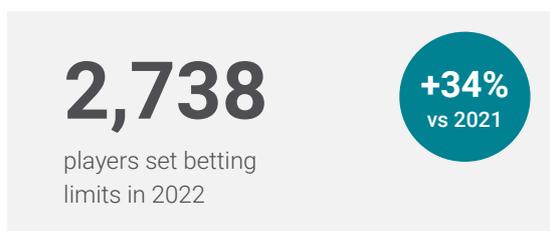
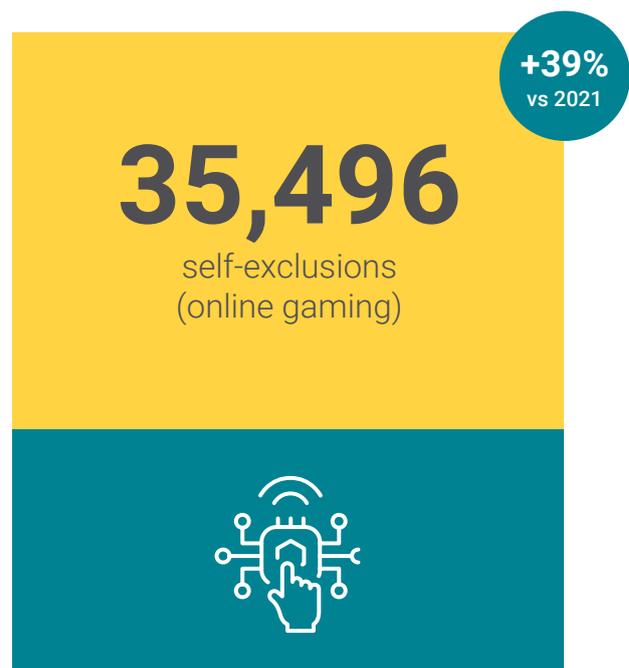
It also offers weekly reports that allow us to identify risky gaming patterns. If we detect that our customers are beginning to exhibit undesirable gaming behaviours, we communicate with them through four phases, through which we can offer them tools to bring themselves under control and even temporarily suspend their accounts.



## We are working to incorporate AI technology into everything from online to in-person gaming

### Self-exclusion reinforcement

Creating a Responsible Gaming culture largely depends on empowering our customers. In line with this commitment, we want each customer to be able to adapt their circumstances to the game experience. In 2022, for example, 2,738 players set betting limits. In addition, we manage a **self-exclusion programme** that allows customers to opt out of gaming whenever they consider it appropriate.



## Social awareness

We must continue to train our customers, through awareness campaigns, to help them make safe and responsible decisions.

In this regard, we are applying the global communication plan **“At CIRSA, We Are Responsible Gaming”** in all our gaming halls, which we adapt to the needs of our customers and employees. As part of this communication plan, we display awareness messages regarding Responsible Gaming throughout our operations. For example, in our gaming halls, we have signs to advise our

customers to only bet the money they can afford, while in online gaming we send notifications via text or email.

In online gaming, we provide our customers with the information they need to feel safe when they interact with us. We also offer tools parents can use to prevent children from accessing online gaming, as well as information about web page self-exclusion.

We also have a dedicated Responsible Gaming call centre that provides guidance to our customers who need help or want to ask for it.

## Our help for problem gamblers

### Collaboration in therapeutic treatment

A significant proportion of our Responsible Gaming efforts are dedicated to collaborating between different CIRSA professionals and researchers to deal with potential gambling-related harm. This is vitally important when customers develop a difficult relationship with gambling.

We recognise that gambling addiction improves significantly with psychological treatment. That is why we are working to establish a strategic partnership with a relevant healthcare institution to fund a behavioural addiction research study to better understand, help and empower our customers to play in a responsible and safe way.

In addition, since 2016, we have been working closely with **ACENCAS** (Asociación Centro Catalán de Adicciones Sociales [Catalan Centre for Social Addictions Association]), devoted not only to helping those who suffer from gambling-related harm, but also their inner circle.



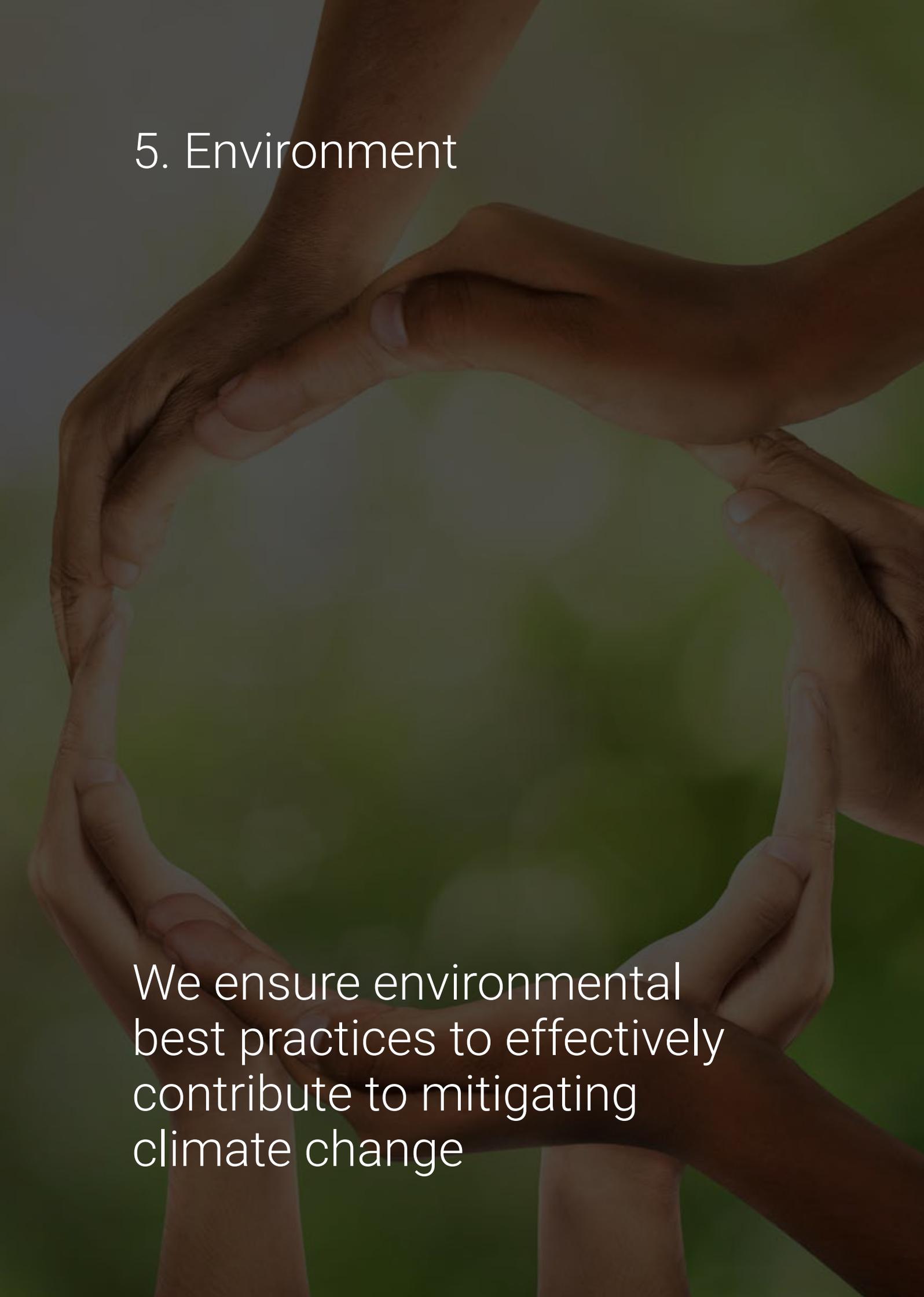
New in 2022, we signed a collaboration agreement with **FEJAR** (Federación Española de Jugadores de Azar Rehabilitados [Spanish Federation of Rehabilitated Gamblers]), whose common interest is the promotion of active Responsible Gaming policies and principles. This agreement allows us, among other things, to support and participate in Responsible Gaming gestures, as well as to publish the toll-free gambling problem hotline in our Responsible Gaming brochures.



### Grants to treat compulsive gambling

Finally, to highlight our agreement with C.A.T. Barcelona, an organisation with which we have been collaborating since 2017 with the aim of enhancing the study and development of **therapeutic programmes for pathological or compulsive gambling**. We also subsidise the treatment for people who require it and meet the requirements established in our collaboration.



The image features four hands of diverse skin tones—light, medium, and dark—interlocking to form a circle. The hands are positioned at the top, right, bottom, and left, with fingers overlapping. The background is a soft, out-of-focus green, suggesting a natural or environmental setting. The overall tone is positive and collaborative.

## 5. Environment

We ensure environmental best practices to effectively contribute to mitigating climate change

# Goal and strategy

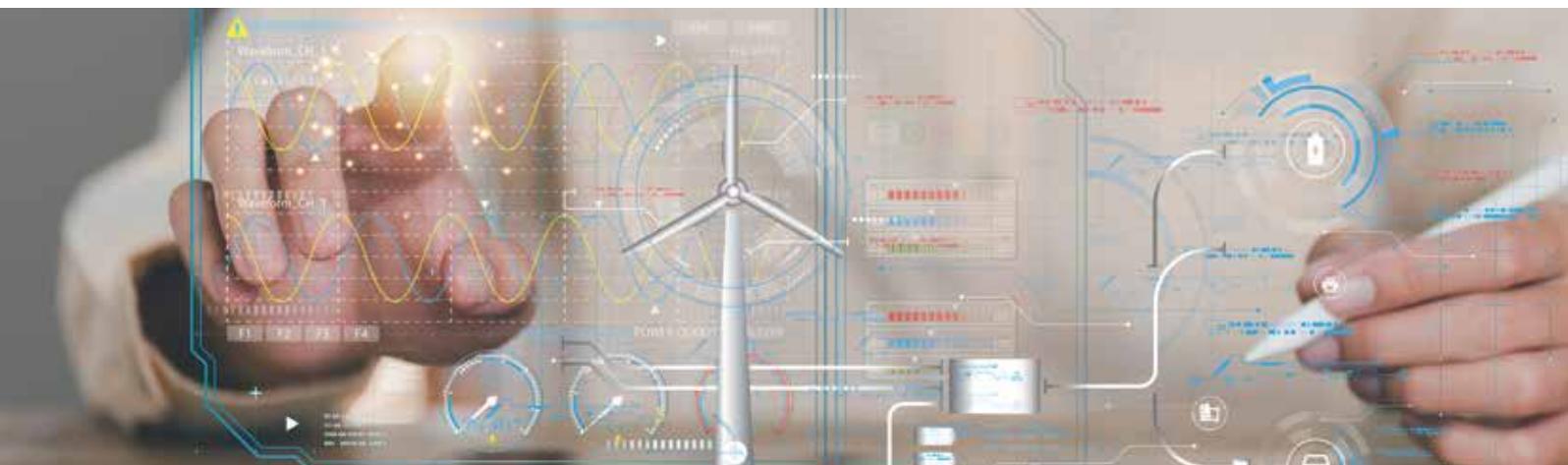
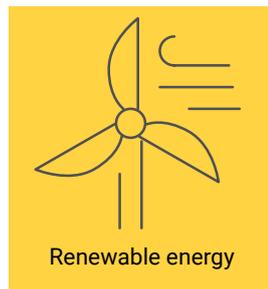
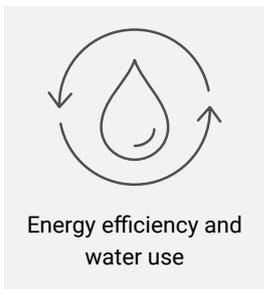


According to the World Health Organisation, climate change is one of the leading threats to humanity and puts at risk the progress made over the last 50 years in global development, health and poverty reduction.

Although our company does not have a significant impact on the environment, we recognise the important role that the private sector plays in supporting the mitigation of climate change, as well as the urgency of acting against it. In this context, we are committed to reducing our environmental footprint and improving energy and process efficiency in all countries where we operate.

Similarly, **we ensure the integration of responsible environmental judgement into our internal processes**, such as decision-making, risk analysis in internal operations and investment. This strategy is set out in our Environmental Policy, which outlines the company's goals to ensure we act in an environmentally friendly manner.

As part of our business and environmental strategy, **we want our casinos** to truly reduce their footprint. In this regard, we have continued to develop our strategic project called **Green Hall** to ensure that all of our casinos apply environmental best practices, with four areas of interest:





**Green Hall** consists of a manual validated by SGS and whose application in our establishments ensures that any action or work be carried out with sustainability criteria in mind. **Four levels of certification are identified, depending on the scope of the action taken.**



All of our facilities use the latest technologies to ensure rational water use and avoid waste, making our consumption more efficient. In terms of energy consumption, we want to make sure that all the facilities apply energy efficiency projects, especially savings in electricity consumption. It is also important for us to encourage the use of renewable energy, with a special interest in the installation of solar panels in our facilities located in sunny geographical points, as is the case for most of them. At the same time, we are committed to continuing to invest in IoT equipment to digitise our thermal comfort and energy management system to make it more efficient.

In addition, when it comes to waste management, we apply a robust waste management system in our gaming halls. We aim to prevent contamination and help reduce the environmental footprint of our operations. In this regard, we apply strict measures to optimise our waste generation in order to recycle as much as possible and thus reduce waste.

Due to the characteristics of the activity, the use of raw materials and the impact on biodiversity are not

considered relevant in their environmental strategy, since they are gaming services and are located in urban environments not close to areas of special environmental protection.

With regard to noise and light pollution, CIRSA complies with the regulations applicable in all its locations to ensure that the possible impacts arising from the carrying out of its activity are minimised.

The environmental strategy is managed and supervised by senior management and is executed through a department with a specific responsibility operating in the markets where we have a presence.

Given the nature of CIRSA's activity, coverage for environmental contingencies is not considered relevant.

During 2022, resources dedicated to the prevention of environmental risks amounted to more than €2.8 million including HVAC equipment, IoT, photovoltaic, projects, etc.



# Actions and results

## Energy efficiency and water use

According to the World Resources Institute, energy consumption accounts for more than 70% of global greenhouse gas emissions. In our case, electricity consumption corresponds to 72% of the Company's total carbon footprint. Our total energy consumption in 2022 amount to 186,981,332 kWh, while the energy consumption per gaming hall and per square metre was 457,167 and 542 kWh, respectively. In this context, each site has applied different energy efficiency projects, such as switching from HVAC equipment to more efficient systems, remote heating management, periodic energy monitoring and application of photovoltaic self-consumption. As for measures against light pollution, the switch from conventional lighting to LED technology has been made.

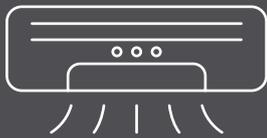
In recent years, digitisation has played a major role in energy efficiency. That's why we continue to upgrade and design custom equipment to monitor and manage our energy consumption remotely. In this regard, we are continuing the IoT project, which involves more than 144 gaming halls from all countries. Between 2021 and 2022 we installed:

**-22.6%**

electricity consumption per m<sup>2</sup> of business surface area between 2015–2022

**0.54**

energy intensity MWh/m<sup>2</sup>



**56**

remote air conditioning management systems



**218**

remote energy management systems



**101**

remote air quality management systems

The renovation of our HVAC systems continues with variable refrigerant flow systems, which allow significant savings in energy consumption. We continue to install energy recovery and remote management of these systems through trained technical personnel to always seek maximum efficiency.

As for water consumption, our impact is not considered significant. Our global water consumption in 2022 was 512,917 m<sup>3</sup>. As an annual average, our casinos use 1,254 m<sup>3</sup>, while our consumption per square metre is 1.49 m<sup>3</sup>. In 2022, data related to water consumption has been calculated based on total annual spending and average unit cost of water in each country.

Morocco is excluded from the scope of the report, due to it not having an environmental structure during 2022. In terms of the workforce, it comprises no more than 4% of the total and in terms of turnover, it only represents 2% of the total.

## Renewable energy

As for the specific electricity consumed in 2022 (151,253,187 kWh), we acquired 98,992,092 kWh from renewable energy sources in the retail electricity market, in addition to producing and consuming 788,618 kWh from our photovoltaic systems. This means that **66% of the total electricity consumed was from renewable energy sources**. To illustrate our positive performance in this regard, this percentage was 44% in the previous year.

We maintain our goal that by 2030 virtually all of the energy acquired will come from **renewable sources**.

In addition to the acquisition of renewable energy, we are increasing our energy production for self-consumption through photovoltaic systems. In this regard, in addition to the installation carried out in 2021 at Casino Winland in Guadalajara (Mexico), in which we installed solar panels with a power of 355 kWp, in 2022, solar panels were installed at Casino La Paz (Mexico) with a power of 173 kWp.

We will expand our medium-term self-consumption capacity in all countries in which we operate.

Since 2018, **we have multiplied our global renewable energy consumption tenfold**.

66%

of renewable energy consumption  
in 2022 in all countries

Our target is **95%** renewable  
energy consumption **by 2030**

## Carbon emissions

As a result of our reduction in energy consumption and renewable energy use, we have been able to significantly reduce our local scope 2 carbon footprint **based on 45% between 2015 and 2022**.

As part of our fundamental commitment to decarbonising our operations, **we aspire to improve our environmental impact by introducing a policy that encourages the use of green vehicles in 2023**, thus further reducing **scope 1** greenhouse gas emissions generated, in our case, in large part by the fuel consumption of our fleet of vehicles.

-45%

carbon footprint reduction of  
scope 2 in tCO<sub>2</sub>e per m<sup>2</sup>



In parallel, we are installing electric charging points that allow our staff and customers to charge their vehicles at our facilities. With this, we pave the way for reducing our Scope 3 indirect greenhouse gas emissions.

As a Group committed to a sustainable, fair and climate-safe future, we want to advance all of our **commitments to mitigate climate change:**

We are committed to reducing our carbon footprint (market-based) by **65%** by 2030 compared to our 2022 emissions, including our emissions per gaming hall and per square metre

We have reviewed our forecasts and want to meet the challenge of **achieving net-zero emissions by 2035** following the Paris Agreement guidelines

Our carbon footprint in 2022:

	<b>tCO<sub>2</sub>e GHG emissions – direct and indirect (market-based)<sup>1</sup></b>	<b>29,315</b>
	tCO <sub>2</sub> e direct GHG emissions (Scope 1)	12,924
	tCO <sub>2</sub> e indirect GHG emissions (Scope 2 - market based)	16,391
	tCO <sub>2</sub> e indirect GHG emissions (Scope 2 - location based)	34,970
<b>Intensity</b>	<b>tCO<sub>2</sub>e of GHG emissions per gaming hall</b>	<b>71.6</b>
	<b>tCO<sub>2</sub>e of GHG emissions per m<sup>2</sup></b>	<b>0.08</b>

<sup>1</sup> Scope 1 and Scope 2 greenhouse gas (GHG) emissions have been calculated using the Greenhouse Gases Protocol Corporate Accounting and Reporting Standard. Scope 1 includes the following fuels: natural gas, propane, butane, liquefied petroleum gas, petrol and diesel. Consumer data has been converted to GHG emissions using the 2020 emissions factors of MITECO (Ministerio para la Transición Ecológica y el Reto Demográfico [Spanish Ministry for the Ecological Transition and the Demographic Challenge]).

<sup>2</sup> Location-based greenhouse gas emissions of scope 2 have been calculated based on national emissions factors. Market-based greenhouse gas emissions have been calculated based on emissions factors from retail electricity providers.

## Circular economy and waste management

We endeavour to strictly comply with current environmental legislation in all countries where we operate by adopting measures for continuous improvement and setting periodic objectives that are verified through audits. Data from 2022 shows that we have generated **870 metric tons of waste**, of which 565 metric tons come from our B2B manufacturing business processes and 305 metric tons from simple gaming activity.

Due to their nature, our industrial activities do not generate a significant amount of hazardous waste. We are implementing a pilot system for the accurate measurement of this type of waste. However, the amount of hazardous waste generated is estimated to be less than 20 metric tons per year across all our countries.

**+91%**

of our corporate and manufacturing waste is recycled

## Climate change

As we mentioned earlier, although our company does not have a significant impact on the environment, we recognise the important role that the private sector plays in supporting the mitigation of climate change, as well as the urgency of acting against it. We are committed to reducing our environmental footprint and improving energy and process efficiency in all countries where we operate.

In this regard, we have launched the strategic project called **Green Hall**, which is a set of guidelines that guarantees that any action is carried out under sustainability criteria, in order to adapt to the possible consequences of climate change. We encourage the **use of renewable energy**, the

To reduce waste generation and encourage recycling whenever possible, we have implemented an effective waste management system tailored to both the manufacturing and gaming activities. As an example, we include an identification seal on CIRSA arcade machines to allow for subsequent recycling. This seal includes information on all components used (printed circuits, screens, plastics, electrical wiring, glass, etc.) to ensure proper disassembly and separation.

In addition, we ensure that customers and our staff recycle at our sites and make proper use of water, while all items that can no longer be recycled are managed appropriately.

In our line of activity, there is not much use of food and beverage activities so specific measures or actions for food waste are not considered in the short term.

**In the industrial process, the management of waste from electrical and electronic equipment (WEEE) is carried out with the company Ecoasimelec, which is responsible for the selective collection and management of the waste we generate.**



installation of **solar panels**, and investment in **IoT** equipment to digitise our energy management system and make it more efficient. We use the latest technologies throughout our facilities in order to ensure the rational use of water. Finally, we are applying a robust waste management system.

We understand that by combining all of these measures, we can quickly achieve our greenhouse gas reduction targets we have set for 2030 and meet our target of NET ZERO by 2035. The environmental strategy is deployed through a specific department that for the markets where we have a presence.



## 6. Social

The CIRSA Team

We endeavour to retain and attract new talent to the Company

# Goal and strategy



We are committed to delivering tailored solutions and providing markets with the best products and services. **Everyone at CIRSA shares this commitment.**

Considering the above, it is critical to manage the risk of increased staff turnover and the costs resulting from new recruitments and the loss of human and intellectual capital. Because our team is a critical part of our company, we must ensure **that it is fully trained and equipped while providing an optimal work environment.**

In this regard, at CIRSA we actively work to meet the needs of our employees, from the most basic to the most complex.

After conducting an analysis of the possible risks in terms of employment, those detailed below have been detected. Additionally, and with the aim of mitigating or eliminating the aforementioned risks,

different plans and policies have been prepared in CIRSA, which are currently being applied.

- **Risk of potential talent loss.** In order to mitigate this risk, different employer brand policies have been developed, as well as a social benefits programme, flexible pay plans, and training programmes, among others.

- **Loss of senior leadership profiles.** In order to detect staff with the greatest potential for growth, as well as to train CIRSA employees and those who can reach positions of responsibility, various training plans have been developed for leaders and managers.

- **Risks to employee wellbeing and health.** 360° health and wellness plans have been created and developed globally to mitigate the aforementioned risk.

## Attracting, developing and retaining talent



**The wellbeing of our employees is one of our top priorities.** Our strategy to attract the best talent includes providing the best work environment to achieve a healthy work-life balance.

We have **comprehensive training programmes** to ensure the team is optimally prepared and motivated. In addition, we also support their career development by encouraging **internal promotions**.

We provide a **safe working environment** and the best working conditions for all our employees, especially when it comes to pay and benefits.

We ensure **freedom of association and social dialogue**, as well as job security, by prioritising permanent rather than short-term temporary contracts.

We ensure that all of our processes – from employment and recruitment requirements to pay and promotions – are applied in an **ethical, inclusive and fair way, while always upholding values of Diversity, Equality and Inclusion**.

# Our team in numbers

In 2022, our team consists of **13,338 people**, of whom 78.6% work for our gaming halls directly or indirectly. The number of employees represents an increase of 8% compared to the fiscal year 2021, of which more than 50% of this increase comprises members under 30 years of age. While this is a big number, as a result of our overall business strategy, we continue to act as a local company, which explains why most of our employees come from the communities where we are present. In particular, **99% of our management teams are local**, that is to say almost all of them.

## Employees by professional category

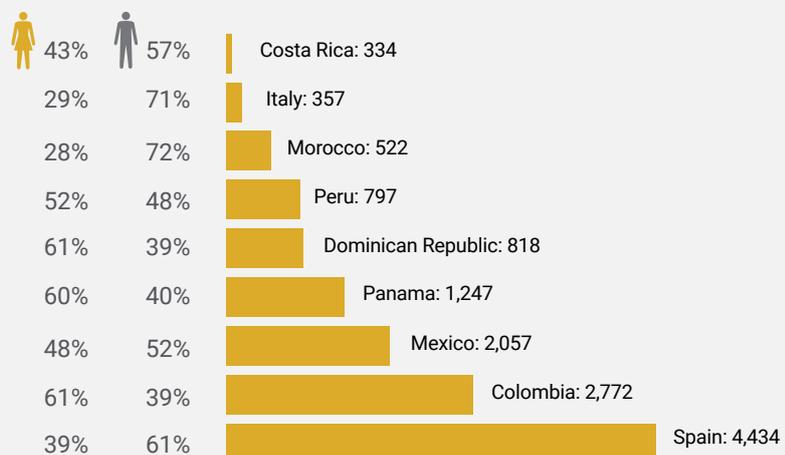
	2021	2022
Management	739	769
Support staff	1,512	1,703
Marketing staff	359	381
Indirect gaming halls staff	2,977	3,203
Direct gaming halls staff	6,724	7,282
<b>Total</b>	<b>12,311</b>	<b>13,338</b>



## Employees by age

	2021	2022
Under 30	2,768	3,339
30-50	7,371	7,768
Over 50	2,172	2,231
<b>Total</b>	<b>12,311</b>	<b>13,338</b>

## Employees by country and gender 2022



# Actions and results

Our primary commitment is to create safe, healthy, diverse, balanced and inclusive workspaces. We offer our staff **an optimal place to work**. We do this by providing ethical opportunities and observing policies of **equality, diversity and inclusion**, with training programmes tailored to the position, ensuring the **wellbeing of our employees**, while offering the best health and safety conditions as well as competitive pay packages.

## Ethical and equality opportunities

### Ethical standards in our processes

We are fully committed to ensuring diversity and inclusion in all of our processes for managing people, from start to finish. We have a zero-tolerance policy for any discrimination. All employees involved in the management of personnel, and especially those in the different HR functions of our Group, have been duly trained in this matter.

### Diversity, equality and inclusion

Regarding **gender integration**, in 2022, a total of **187 women have held a management position in gaming halls**, representing **43% of managers**.

In addition, our **global** team consists of **49% women and 51% men**, reaching **56% of women in Latin America**. We are proud to present these figures, as they position us above the industry average (46% women versus 54% men), without limiting our willingness to continue improving these percentages.



At the national level, we are working on a total of **24 Equality Plans**, which include specific actions in the areas of communication, training, development, safety and health promotion. In response to our responsibility to the **diversity and integration** of our multicultural teams, which are currently made up of **59 different nationalities**, CIRSA has developed a robust set of measures to ensure that all people are accommodated and included with equal opportunities.

This is done by achieving **gender parity** in our positions, ensuring gender integration in the company and defining a glossary of terms in matters of equality. We also drive positive actions to be a fair company that promotes equal opportunity through our various internal policies of Human Resources, Human Rights and Corporate Governance.

With regard to the measures of integration and accessibility for people with disabilities, CIRSA guarantees that all people have the same opportunities, ensuring an inclusive approach to our practices of recruiting, selecting, promoting and retaining diverse talent and we ensure maximum compliance with RD 1/2013 of the General Law on the Rights of People with Disabilities and their social inclusion, as well as other applicable international and/or local regulations. Consequently, in this fiscal year, the **number of employees with disabilities** in the Group has increased by 7% compared to 2021, with the total number being **123 employees**.

In addition, this year we have reinforced our commitment with the **Diversity, Equity and Inclusion (DEI)** by signing a collaboration agreement with the Seeliger y Conde Foundation.

**Fundación**  
**Seeliger y Conde**

## Employees by country and gender

Country/gender	2021			2022		
	Women	Men	Total	Women	Men	Total
Spain	1,687	2,736	4,423	1,747	2,687	4,434
Colombia	1,543	1,006	2,549	1,682	1,090	2,772
Mexico	892	880	1,772	997	1,060	2,057
Panama	753	493	1,246	745	502	1,247
Dominican Republic	510	293	803	503	315	818
Peru	398	394	792	417	380	797
Morocco	4	35	39	148	374	522
Italy	112	253	365	103	254	357
Costa Rica	139	183	322	142	192	334
<b>Total</b>	<b>6,038</b>	<b>6,273</b>	<b>12,311</b>	<b>6,484</b>	<b>6,854</b>	<b>13,338</b>

## Social dialogue and employment security

### Freedom of association and trade union representation

#### We guarantee freedom of association and trade union representation

to all our employees and recognise their right to collective bargaining and strike action. For this reason, CIRSA pays special attention to the adoption and promotion of applicable laws and agreements with union representatives. Similarly, under the local laws of the regions in which we operate, we do not engage in any action that restricts the rights of employees. All of these actions are governed by our Code of Conduct and our Code of Ethics, which are given to each and every employee on our team.

Specifically in Spain, there are more than 50 bodies that legally represent workers, whose functions and union duties are respected, enabling access to the necessary training, as well as providing them with the tools they need in their daily work tasks.

Likewise, in compliance with current legislation on occupational health and safety, the setting up of Health and Safety Committees in most workplaces has been encouraged.

**We are currently negotiating with UNI Global Union to reach an international agreement that will strengthen our dialogue and commitment on Human, Union and Environmental Rights and provide coverage for social dialogue with employees in the rest of the countries where the Group operates.**



### Quality of employment

We prioritise employment contracts of indefinite duration, resulting in quality of employment for all local communities in which we operate. Job security is also critical to attracting the best talent and providing the best service to our customers.

**95%**

of our employees are covered by collective agreements

**95%**

permanent contracts

## Number of employees covered by collective agreements by country

Country	2021			2022		
	Employees	%	Employees covered	Employees	%	Employees covered
Spain	4,423	100%	4,423	4,434	100%	4,434
Colombia	2,549	100%	2,549	2,772	100%	2,772
Mexico	1,772	64%	1,134	2,057	74%	1,515
Panama	1,246	100%	1,246	1,247	100%	1,247
Dominican Republic	803	N/A	-	818	N/A	-
Peru	792	N/A	-	797	N/A	-
Morocco	39	N/A	-	522	N/A	-
Italy	365	100%	365	357	100%	357
Costa Rica	322	100%	322	334	100%	334
<b>Total</b>	<b>12,311</b>	<b>82%</b>	<b>10,039</b>	<b>13,338</b>	<b>80%</b>	<b>10,659</b>
<b>Total collective agreements</b>	<b>10,677</b>	<b>94%</b>	<b>10,039</b>	<b>11,201</b>	<b>95%</b>	<b>10,659</b>

In those geographical areas where specific legislation exists, our employees are subject to applicable collective agreements, and in all other countries to applicable state regulations, therefore, the collective agreement is not applicable (N/A).

These agreements include matters related to health and safety and health at work.

## Employees broken down by type of contract\*

Country	2021				2022			
	Indefinite		Temporary		Indefinite		Temporary	
	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time
Spain	3,540	459	304	120	3,889	323	188	34
Colombia	2,549	0	0	0	2,752	0	20	0
Mexico	1,334	0	438	0	2,056	0	1	0
Panama	1,236	0	10	0	1,233	0	14	0
Dominican Republic	799	0	4	0	816	0	2	0
Peru	749	3	40	0	777	3	17	0
Morocco	23	0	16	0	225	0	297	0
Italy	347	0	18	0	337	0	20	0
Costa Rica	322	0	0	0	333	0	1	0
<b>Total</b>	<b>10,899</b>	<b>462</b>	<b>830</b>	<b>120</b>	<b>12,418</b>	<b>326</b>	<b>560</b>	<b>34</b>

We prioritise indefinite and full-time working relationships whenever possible. During 2022, the proportion of temporary employees hired decreased by more than 40% compared to 2021. Due to the nature of our activity, there are no substantial changes in the workforce during the year.

\* A table is shown on page 66, detailing the type of contracts by gender, age and category for the year 2022.

## Employment conditions – remuneration of employees

We are not only aware of the importance of developing our people, we are also committed to providing a competitive pay package for every employee at all levels. In this regard, we offer a wide range of social benefits to our employees, with the possibility of using **discounts** on the

purchase of products and/or services. Additionally, we offer **scholarships** to promote the professional development of employees of the Group, as well as a **Flexible Remuneration Plan** that includes health insurance, restaurant vouchers, day-care allowance and a transport pass card.

## Number of staff terminations by gender, age and professional category

Gender	2021						2022					
	Women			Men			Women			Men		
Professional category	<30	30-50	>50	<30	30-50	>50	<30	30-50	>50	<30	30-50	>50
Management	0	5	0	0	14	3	1	7	2	0	16	14
Support staff	11	34	1	14	25	5	13	25	7	11	24	13
Marketing staff	2	6	0	1	6	1	4	7	0	2	7	12
Indirect gaming halls staff	26	49	14	48	112	9	25	50	7	55	105	19
Direct gaming halls staff	157	159	15	140	112	16	203	211	25	150	140	45
<b>Total</b>	<b>196</b>	<b>253</b>	<b>30</b>	<b>203</b>	<b>269</b>	<b>34</b>	<b>246</b>	<b>300</b>	<b>41</b>	<b>218</b>	<b>292</b>	<b>103</b>

CIRSA has a firm policy of maintaining employment in all countries where it operates.

## Safety, health and working conditions

### Occupational health and safety

At CIRSA, we are highly committed to occupational health and safety – as set forth in our Prevention of Occupational Risks policy – being a key priority for our Human Resources team.

Some of the results of our efforts to preserve health and safety at work can be seen by the very small number of workplace accidents that have occurred at CIRSA. Specifically, in 2022, there have been only **283 occupational accidents** and **0 occupational diseases**.

### Accident rate

	2022		
	Total	Women	Men
Accidents	283	183	100
Frequency rate <sup>1</sup>	11,29	14,94	7,69
Severity rate <sup>2</sup>	0,19	0,23	0,15
Occupational diseases	0	0	0

<sup>1</sup> The frequency rate has been obtained by dividing the number of accidents with leave by the number of hours worked multiplied by 1,000,000.

<sup>2</sup> The severity rate has been calculated by dividing the number of workdays lost due to accidents with leave by the number of hours worked multiplied by 1,000.

Likewise, within the policies in force at CIRSA and the measures derived from them, a workplace free of any type of harassment is promoted, where offensive or inappropriate conduct is not tolerated.

Finally, by analysing the ratios currently observed at CIRSA, a **global absenteeism rate of 3.3%** has been detected, which would be equivalent to **1,218,328 hours\***. This index includes absenteeism due to sickness and accidents.

\* Estimate of 8 hours per lost working day

### Absenteeism index

Country	2022
Spain**	5.8%
Colombia	2.5%
Mexico	2.0%
Panama	0.3%
Dominican Republic	1.1%
Peru	1.7%
Costa Rica	1.5%
<b>Total</b>	<b>3.3%</b>

\*\* Impact Covid-19 as a disease

## Professional development

### Internal promotions

One of the most important positions in managing any retail gaming company is the gaming hall shift manager. Filling this position with employees familiar with the Group's culture, values and procedures is a key success factor. We are proud to achieve a **95% internal promotion rate** for this position in the Group. Both training programmes and procedures for screening the best internal talent have been key to achieving this number.

# >90%

We are committed to maintaining a ratio of internal promotion to external recruitment in our operations of more than 90%

### Staff rotation

Our global annual staff turnover rate of **35.2%** is closely related to the different labour market situations in the countries where we are present. The dynamism in the labour market after the Covid-19 period has increased these indices. While in Europe the turnover rate is below 18%, in other countries this rate is significantly higher, as in the general labour market. We are committed to reducing CIRSA's turnover rate while also being proud to increase the employability of our team through training courses, language learning and, most importantly, promoting ethical and professional values across the organisation that clearly exceed the standards of the markets in which we operate.

### Rotation rate % broken down by country

Country	2021	2022
Spain	10.1	17.5
Colombia	27.0	42.9
Mexico	68.0	82.1
Panama	9.4	11.8
Dominican Republic	21.5	29.9
Peru	40.3	58.4
Italy	12.0	15.2
Morocco	34.2	33.6
Costa Rica	11.0	35.9
<b>Total</b>	<b>25.9</b>	<b>35.2</b>
<b>Rotation rate (Europe)</b>	<b>11.1</b>	<b>17.3</b>

## Training and development

At CIRSA, we consider service excellence as a priority, and we train our employees in this area. With this, we are able to strengthen our own unique personality and way of working, to transmit it every day to our customers. To make this a reality, **we are committed to internal talent** through programmes for detecting and evaluating talent potential, which we accompany with career development plans and training plans that help us ensure success in internal promotions and succession in critical positions, both in operations and support areas.

Some examples of **training and development programmes** include: the Masía Plan, designed to detect and leverage international talent on defined career paths in casinos, the Excellence Plan to improve technical and service performance, and a Growth Plan for future leaders.

As part of our training catalogue, we also offer small, voluntary **training modules** focused on providing new tools that improve the quality of the personal and professional life of employees. Likewise, we

promote those guidelines that may be more strategic for the company and our culture of continuous improvement, such as **training courses in the area of Governance and Responsible Gaming**.

The Group has also conducted training on health and safety.

Beyond corporate programmes and training plans, we also offer **ad hoc training that** addresses individual needs. We also facilitate and disseminate internally those conferences, symposia or actions that we believe can help our employees keep themselves at the forefront.

Additionally, through the International Scholarship Programme of the CIRSA Corporate University (Universidad Corporativa CIRSA, UCC), employees may benefit from scholarships to conduct studies that complement their professional knowledge and experiences. Over the past 10 years, more than 800 people have benefited from the scholarship programme.

### Training hours by professional category

Professional category	2021	2022
Management	2,447	4,214
Support staff	12,625	37,295
Marketing staff	1,028	4,648
Indirect gaming halls staff	11,122	16,183
Direct gaming halls staff	241,644	801,965
<b>Total</b>	<b>268,866</b>	<b>864,305</b>

2021 with strong Covid-19 restrictions.

We also **ensure gender inclusion** by offering our educational programmes. These programmes are international and identify and train employees with the greatest talent and potential, with the objective of filling vacancies internally, following the career paths defined for each function. In addition, 62% of participants in skills development programmes in the past year have been women. Skills development programmes are designed as the gateway to management development programmes. In this regard, 50% of participants in management development programmes were women. This percentage of women among the participants of both training programmes ensures that there is a group of women with clear options for promotion, which will contribute to our objective of achieving parity in the management positions in the gaming halls.

**In 2022, the impact of our training courses was 4.30 – that is, each employee took at least 4 courses during the year, compared to 2021, which is more than 30% in line with the goal set for the year 2023 (40%).**

We continue to enhance internal training and ongoing training, both at the individual and group levels through ad-hoc Programmes. All of these programmes have led at the CIRSA Group level to 58,853 training actions and 864,305 hours of training.

### Training hours by country

Country	2021	2022
Spain	13,807	43,201
Colombia	181,926	647,878
Mexico	31,197	89,409
Panama	1,535	8,935
Dominican Republic	31,701	20,806
Peru	6,017	18,792
Italy	849	3,430
Morocco*	0	0
Costa Rica	1,834	31,854
<b>Total</b>	<b>268,866</b>	<b>864,305</b>

\* Morocco without activity in 2021 until May 2022.

### Cross-divisional projects

At CIRSA Spain we have implemented a series of **cross-divisional projects** to respond to the training needs of our employees:

- **Digital Skills:** To enhance digital and office skills.
- **Languages and Smart Modules:** Focused on improving the professional and personal development of employees.
- **Compliance:** Our efforts have focused on the design and implementation of 4 new training courses with the Compliance Department, also of a cross-divisional nature, which are being progressively extended throughout the Corporation. These are namely: Responsible gaming, data protection and information systems, money laundering and general compliance.

We have continued to work with our **Corporate Programmes** to achieve continuous improvement, either by refining the role or by identifying and enhancing career development, especially of key employees.

In turn, each Country has continued to develop *ad hoc* training projects in both corporate and Business staff, to improve the skills of our employees and at the same time increase the value proposition of our businesses.



## Employee wellbeing. Talent retention measures

Because people are the driver of CIRSA, we not only focus our HR activities by **attracting, developing and retaining talent**, but also on ensuring their wellbeing. We focus on ensuring fair and equitable treatment of all team members and promote respect, upholding equal opportunity, regardless of gender or nationality.

One of our success elements for attracting the best workforce includes our working conditions, which contribute to a healthy **work-life balance** and provide greater flexibility so our employees can care for their children and other dependent relatives. To do this, we make sure that their needs are met throughout the year and that their holidays taken are compatible with family needs. We also offer the ability to reduce working hours to devote to childcare by up to 50%. In addition, we are **committed to increasing working from home** in positions where this mode is possible. We do this

while adapting to the needs of our employees and the new context of the labour market.

In parallel to the legal measures – such as maternity/paternity leave and the reduction of the workday to care for a minor or a family member (up to the 2nd degree of consanguinity or kinship) who cannot take care of themselves or the general leave of absence – CIRSA has implemented a series of measures to facilitate this work-life balance:

- Teleworking.
- Shortened workday and flexible working hours.
- Reduced meal time to end the day early.
- Days for attending to personal affairs.
- Social benefits: discounts on goods or services, flexible pay, etc. focused on facilitating the employee's day-to-day activity.

**We offer a wide range of benefits to all of our employees, regardless of whether they have indefinite or temporary contracts.**

At CIRSA, employees are our priority. That's why their opinion is very valuable to us. In order to hear from them all and involve them in the management of the company, in terms of information, consultation and participation, we have a **suggestions channel** located on the corporate Intranet site in Spain.

Under our motto “**Enjoy life with us**”, we develop actions to promote **mental, physical and social health** among our employees. Some of the most representative actions in terms of mental and physical wellbeing include:

*Enjoy life with us*



**El Plan de Bienestar 360º pensado para ti**

Hemos preparado un amplio programa de actividades basado en 3 pilares: **muévete, saborea y emocionate**, con los que te proponemos (y promovemos!) un **estilo de vida más saludable**

(Dedícate un tiempo para ti, **haz un paréntesis y cuidate**)

**Physical activity**

We offer yoga, cross-training, Pilates and CrossFit, among other activities. We have three sports clubs: paddle tennis, running and cycling

**Healthy nutrition**

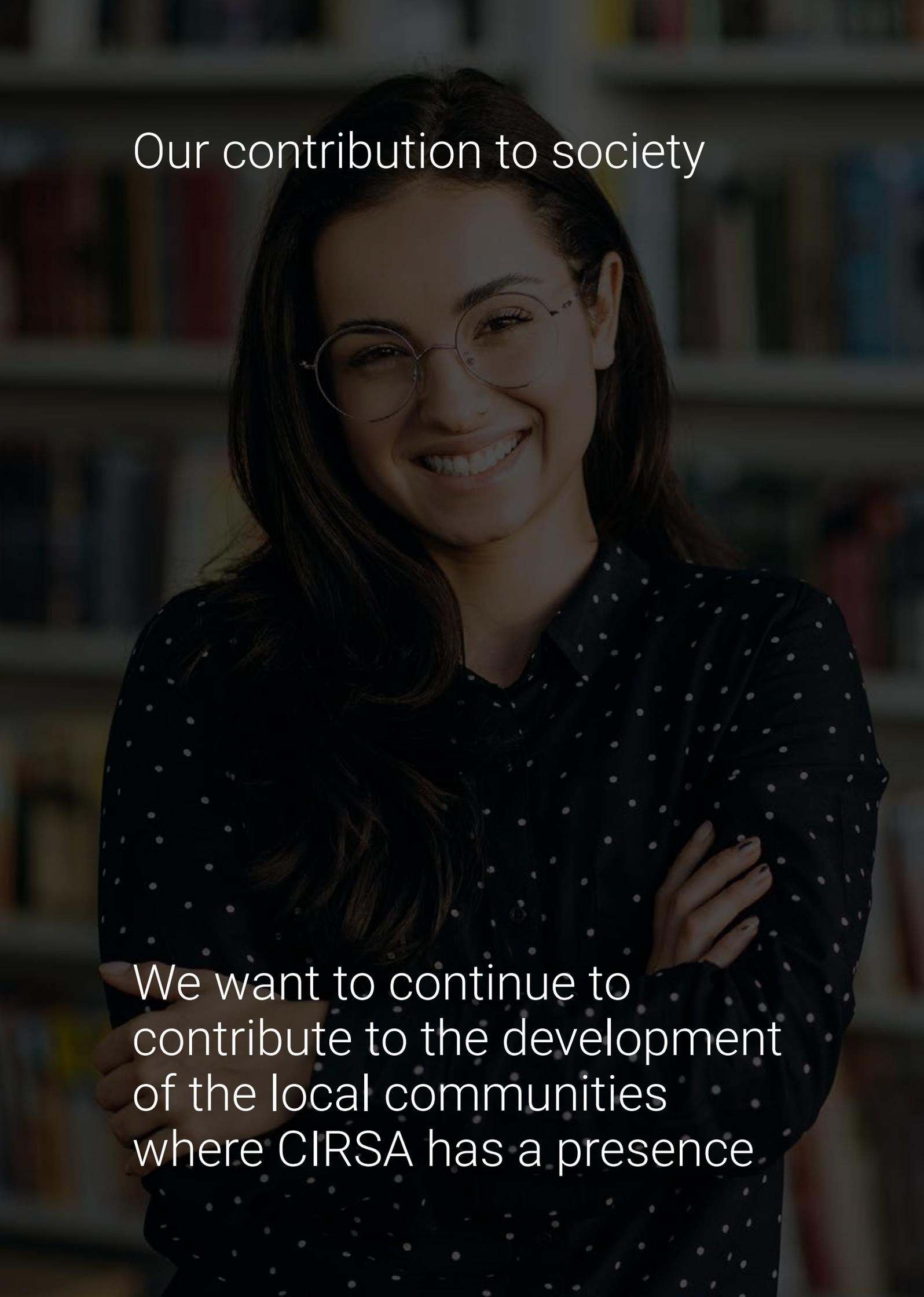
We have created initiatives to improve our employees’ knowledge and awareness of healthy eating habits, such as “Relish your breakfast,” “Tupper meals,” and “Healthy shopping”

**Emotional wellbeing**

We promote activities to improve the emotional wellbeing of our employees, such as mindfulness and laughter therapy

**Smart pills**

We offer intensive training modules aimed at improving aspects such as the inner strength and self-control of our employees

A young woman with long dark hair, wearing round glasses and a dark polka-dot shirt, stands in a library with bookshelves in the background. She is smiling warmly at the camera with her arms crossed. The image has a dark overlay.

Our contribution to society

We want to continue to  
contribute to the development  
of the local communities  
where CIRSA has a presence

# Goal and strategy



In addition to creating local jobs and ensuring tax revenues that contribute to funding socio-economic development programmes in the countries where we operate, we are **firmly committed to the local community** and work to build strong ties with small

businesses and stakeholders near us. In addition, we also engage in supporting social initiatives devoted to helping the most vulnerable in the different countries where we are present.



## Actions and results

### Economic contribution

With more than 13,000 employees in 9 countries, our economic footprint is significant, creating only **positive impacts** in the communities where we are present. An important contribution we make to the development of the countries in which we operate is the **taxes on gaming** and **economic activities**. In 2022 alone, this amounted to **€662 million**.

Our industry is one of the most important contributors to local economies. Not only through

taxes, but it also creates employment and provides entertainment to many people. As an example, Spain's gambling sector paid around €1,215 million in gambling fees to both the central government (180) and regional governments (1,035) in 2022. The economic contribution to the sector is estimated at 0.8% of GDP, while our industry creates about 85,000 direct jobs and 175,000 indirect jobs.

**99%**

More than 99% of CIRSA staff are from the local communities where the company's revenue is generated

CIRSA is committed to working only in regulated markets through local companies, in order to contribute to public resources through the payment of taxes on gaming and corporate activity according to the level of activity in each of the countries, in addition to offering all assurances to our customers.

# Contribution to the community

At CIRSA we work to help build a positive society and we are proud that our taxes also contribute to doing so. In parallel, we collaborate with local foundations and non-profit organisations that are well-informed about the needs of these groups. **In 2022, we donated 443.060 euros to non-profits and public entities to help those who need it most.** Below are some of the main initiatives we have been involved in by country.

## Mexico

We collaborated with the Association of People with Reduced Mobility, in the Help to Move initiative, consisting of donations for the purchase of wheelchairs. Other initiatives have been the purchase of appliances for a Christmas raffle, as well as a donation to the University of Colima for a concert by the Manzanillo philharmonic orchestra.

## Costa Rica

Agreement with the Sanidad Divina Church for the purchase of gifts and sweets during the Christmas period.

## Colombia

Collaboration with various foundations at the national level by offering them our spaces/theatres completely free of charge so that they can organise events and charitable bingos to raise funds to help people in need. In Cali, we have collaborated with the Artista Colombiano Foundation, the Asopacifico Foundation and the Tu Vida Foundation. In Medellín with the Trasplantados Foundation, Corporación Social Mi Gente, AHVO pink ladies and finally in Bogotá, collaboration with the San Vicente de Paul Foundation.

## Panama

Several activities have been organised to help those most in need. Donations of baskets of items for newborns in maternity wards at the national level, as well as other donations to the National Cancer Institute. We have also collaborated with the Soy Nueva Luz Foundation, with the Un Plato con Amor initiative, by donating food to families with underserved children. Finally, we have actively participated in the Blood Donation campaign.

## Dominican Republic

We contributed financially to several foundations: Findicp Foundation, dedicated to rescuing boys and girls from abuse and exploitation; Cesal Foundation, which takes actions to strengthen territorial governance, promote sustainable livelihoods, combat deforestation and eco-sustainable tourism; and we collaborated with the Acción Callejera Foundation, which provides support with food, medicines, education, sport, psychology and health in 8 marginalised communities in the province of Santiago de los Caballeros to children and adolescents.

## Peru

We supported multiple entities, through donations to local administrations in the form of toys, food and clothing to native communities and other in-kind donations to the Emaús Peru organisation, in the form of uniforms and other items for abandoned children, among others.

## Spain

Our commitment to the local community takes the form of collaboration with several organisations, such as the Avance Positivo Association, which works to cover HIV patients by paying for treatments for people without funds and psychological help for people living with the virus. Other actions included a donation to the Ancor Project, which is an initiative that, together with the NEN Association, raises funds for neuroblastoma treatment research. We collaborated with the Spanish Association Against Cancer (Asociación Española Contra el Cáncer, AECC), as well as participating in the "Cursa Fanny Sallés" race in support of the fight against cancer, providing the economic value of the registrations that were donated to the Fundació Oncolliga, dedicated to providing psychosocial support to people with cancer.

Through the Sportium Foundation, an agreement has been signed with AVAN for the construction of a gym at its new Terrassa headquarters. The AVAN Foundation is a non-profit organisation that offers therapeutic, associative and leisure support to people affected by neurological diseases.

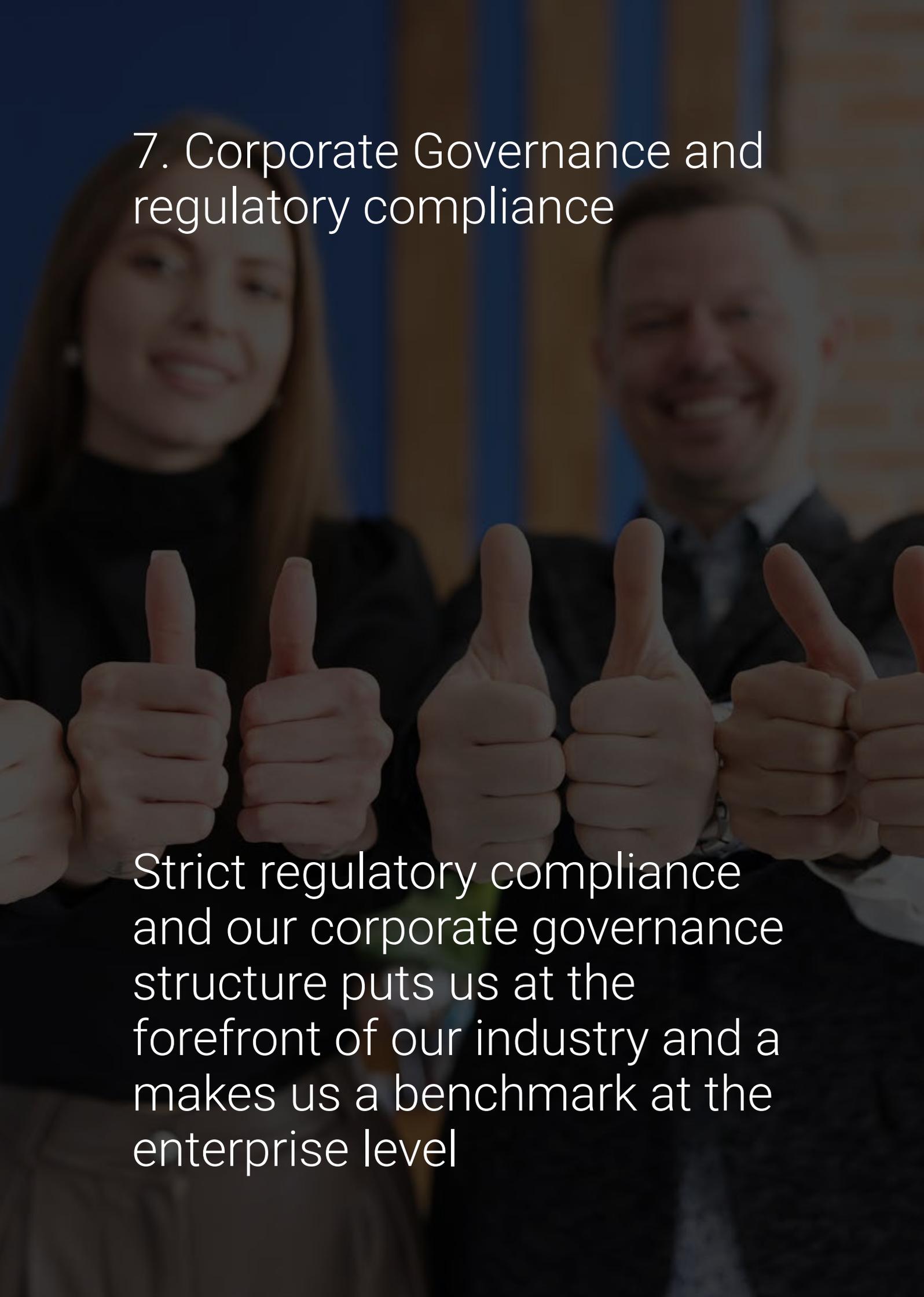
A collaboration agreement has been signed with the Royal Spanish Athletics Federation (Real Federación Española de Atletismo, RFEA) to promote solidarity sports, making it more accessible to vulnerable people. The Sportium Foundation will contribute to the Solidarity Programmes that the RFEA has or that may be implemented, supporting the optimal implementation and execution of these, while promoting the integration of people and groups at risk of social exclusion through sport.

## Morocco

Collaboration with an association of older people with diabetes, as well as collaboration with a local orphanage.

## Italy

Collaboration with the Buzzi Hospital of Milan for the acquisition of Christmas gifts for hospitalised children.

A group of business professionals, including a woman on the left and a man on the right, are giving thumbs up. The image is dimmed and serves as a background for the text.

## 7. Corporate Governance and regulatory compliance

Strict regulatory compliance and our corporate governance structure puts us at the forefront of our industry and makes us a benchmark at the enterprise level

# Goal and strategy



At the heart of our ESG and business strategy is strong Corporate Governance and regulatory compliance. This is achieved through a process of monitoring and controlling our operations by applying the knowledge and experience of the members of the Board of Directors, the management team and the internal audit team, who specialise in compliance matters. Our strict compliance keeps us at the forefront of our industry, with zero tolerance for corruption or any violation of the laws that govern our activities.

We have the best mechanisms in place to adopt best practices, principles and recommendations regarding standards of Corporate Governance and regulatory compliance. In fact, **ethics, integrity, respect for rights, transparency and honesty** are principles that we uphold, and so we reject any potential irregularities.

**Our activity is also designed so that each person within the company strictly complies with the legislation in force in each country and region where we operate.** The mechanisms we apply include<sup>1</sup>:

## 1.

Our **Code of Conduct**, which sets out the basic principles and standards that everyone in the Group must follow.

## 2.

Our **Risk Management Model** based on the lines of defence model, which involves three levels of compliance control in the organization.

## 3.

Our **Ethical Helpline Channel**, which reports on compliance matters affecting the company.

## 4.

Our **Crime Prevention Model**, which prevents, detects, investigates and resolves any practice contrary to law and our internal regulatory body.

## 5.

Our effective **training on compliance procedures**, which ensures that our employees are prepared to act in the event they encounter actions that go against our Code of Conduct or compliance policies.

## 6.

Our **Data Protection and Information Security Policy**, which ensures the rights of users and ensures the protection of their personal data.

## 7.

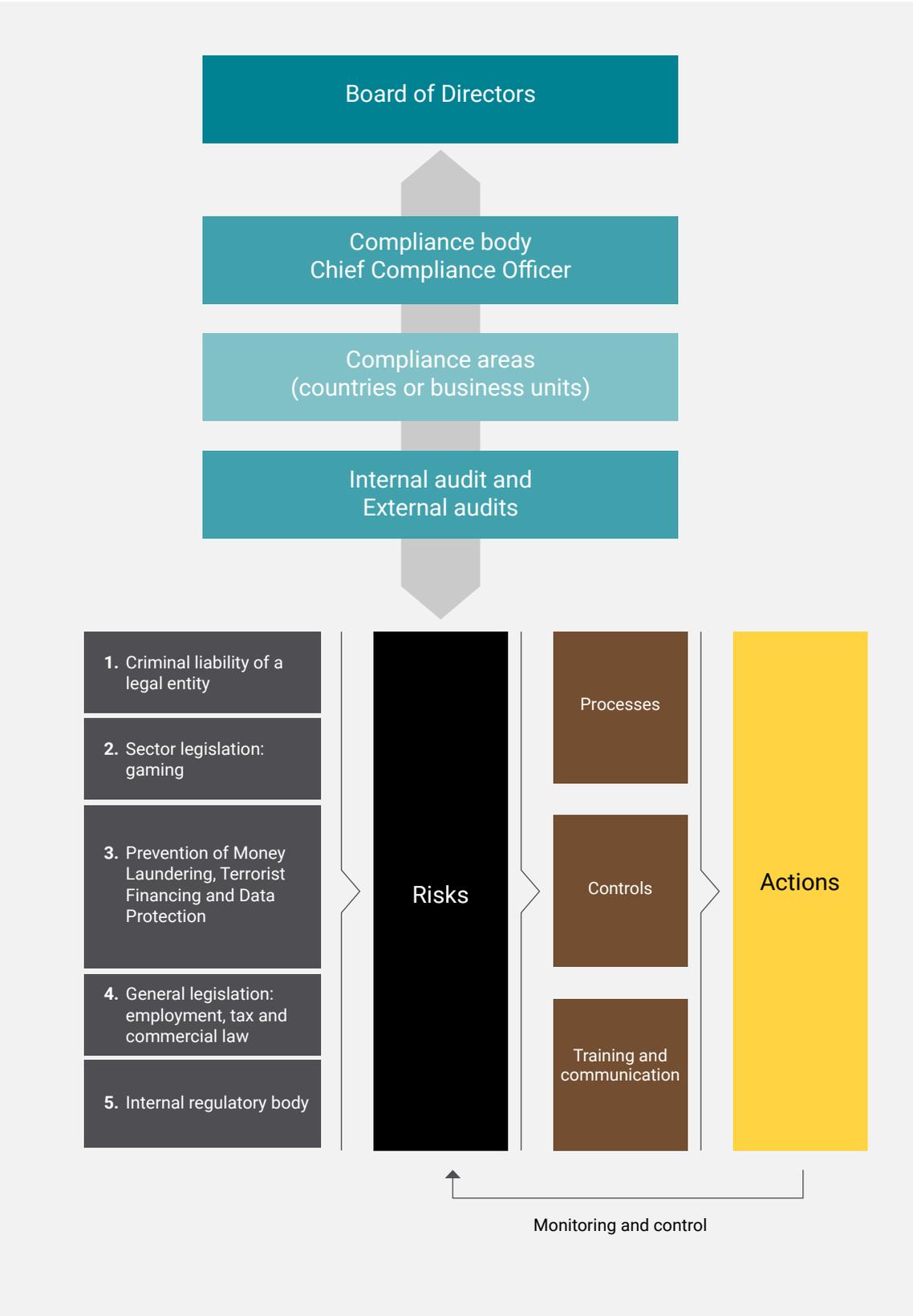
Our **supplier approval processes**, which ensure that not only do our operations meet our ethical values, but also our supply chain.

All these mechanisms are reviewed by the Board of Directors, which ensures that the goals and objectives set for each year are followed in terms of compliance and other matters.

Likewise, and as stated in the Group's Code of Conduct, strict compliance with its commitments and obligations with respect to relationships with customers, suppliers, partners and the environment is guaranteed. This is the basis for avoiding any possible wrongdoing that could have a strong impact on the company's reputation and the on the company itself.

<sup>1</sup> More details in the Actions and Results section below.

# Compliance structure



## Activities of the Board of Directors

To achieve strong Corporate Governance, we focus our efforts on strictly meeting goals and objectives set for each year. For this reason, at CIRSA we have held **9 meetings of the Board of Directors during 2022, which exceeds the minimum required number of meetings** (4 per year).

In addition, the Group's Executive Chairman has held this position for 16 years. In April 2022, the CIRSA Group endorsed Antonio Hostench, until then Chief Strategy and Development Officer, as the new CEO after the Group's Board of Directors decided to accept the proposal from the Chairman and CEO, Joaquim Agut, to divide both functions.

As Executive Chairman, Joaquim Agut continues to lead and implement the Group's strategy, overseeing management and differential corporate functions.

In addition, he is the primary champion of ESG strategy, initiatives and activities.

Antonio Hostench, as the new CEO, focuses his responsibility on the management of the business units (Casinos, Online Gaming and Gambling, Operation of slot machines Spain and Operation of slot machines Italy) and corporate functions, maintaining the presidency of Sportium.

9

meetings of the Board  
of Directors in 2022

## Actions and results

Our Corporate Governance model provides other companies – and even other sectors – with best practices, as it has demonstrated its effectiveness in the proper conduct of our activities. The main aspects of our Corporate Governance are explained in detail below.

### Regulatory compliance

**We ensure compliance with regulations** by applying the **Code of Conduct and the internal regulatory body of the Group**, which allows us to ensure that all relevant requirements are met in the countries in which we operate. To meet this goal, we have structured the organisation based on **three levels of control on compliance**:

1. The first level corresponds to **each business unit** in the day-to-day management of their operations, which closely monitors the legality of the actions to be implemented based on the experience of the management team.
2. The second level corresponds to the **Compliance Department**, in charge of managing the crime prevention model, which provides information on internal policies and regulations, and shapes the compliance model.
3. The **Internal Audit**, which performs independent reviews of this model to verify its compliance and the effectiveness of established corporate policies and standards.

# Code of Conduct and Ethical Helpline Channel

Our Code of Conduct establishes guidelines for professional and personal behaviour that affect all employees and professionals linked to the Group.

Our Code of Conduct takes into account international agreements on human rights, anti-money laundering and terrorist financing, anti-corruption and sustainability. Specifically, CIRSA adopts and fully incorporates the ten principles of the United Nations Global Compact through its recent adherence to the Compact.

Through our **Ethical Helpline Channel**, all of our employees and collaborators, board members, customers, suppliers, partners, consultants, shareholders and, in general, anyone who provides services for the Group, may confidentially report or communicate any potentially irregular activity and behaviour that may constitute an infringement of our Code of Conduct.



This channel allows us to continue to comply with the requirements of current and new European directives (such as Directive (EU) 2018/843 of 30 May 2018, Regulation (EU) 2016/679 of 27 April 2016 and Directive (EU) 2019/1937 of 23 October 2019) and to reinforce the Group's high degree of regulatory compliance. In addition, this helps us maintain a firm commitment to society, as the platform allows us to report anonymously – if desired – any potential irregularities of possible relevance that may occur within our Company or on its behalf.

We have **developed and distributed** to all our employees, collaborators and other parties involved in our activities, **an operating policy** of the Ethical Helpline Channel to ensure its use in the event of potentially irregular activities and behaviours that may constitute an infringement of our Code of Conduct.

The Ethical Helpline Channel is managed by the Compliance Department, available 24 hours a day, 7 days a week, and accessible in English, Italian, French and Spanish. In the operating policy mentioned above, we explain how to use our Ethical Helpline Channel in more detail, and how data is processed **to ensure the security and effectiveness of whistleblowing action.**

# Anti-corruption policy

In line with our strategy, our **Anti-Corruption Policy emphasises the express prohibition of all forms of bribery**, understood as anything of tangible or intangible value that is offered, promised, paid, authorised or given to a third party for the purpose of unlawfully influencing a business decision or gaining an improper advantage in the activity of Group companies. Bribes can be in the form of payments, gifts, trips, entertainment, job offers, contacts, debt or donation forgiveness, among others.

In this regard, **CIRSA has obtained the International Anti-Corruption and Fraud certification issued by the Spanish Institute for Regulatory Compliance and Fraud Prevention (Instituto para el Cumplimiento Normativo y la Prevención del Fraude, ICPF).**



If employees have any questions or witness any attempt at corruption and/or bribery, they should inform the Company by notifying their manager and emailing [compliance@cirsa.com](mailto:compliance@cirsa.com), an account managed by the Compliance Department.

They also have the possibility of reporting the event through the Ethical Helpline Channel, <https://www.bkms-system.com/COMPLIANCE-CIRSA>, from which the anonymity of the person reporting the incident can be guaranteed if they do not want to reveal their identity.

Our Code of Conduct establishes the following principles with the goal of preventing corruption at all levels:

## 1. Promoting integrity

We promote a culture of integrity within our Group, as well as with our suppliers and collaborators. By providing training and promoting ethical conduct, we can prevent unlawful behaviour that is contrary to our Code of Conduct

## 2. Business courtesies

Gifts, courtesies, invitations to events, among others, will be based on our internal policy and in no case will they influence the willingness or objectivity of people outside our Group to obtain any improper business benefit or advantage

## 3. Conflicts of interest

We respect the participation of our employees as long as those activities take place within the applicable legal framework and do not compete or conflict with their obligations as CIRSA professionals, nor are they used to carry out any corrupt practices

## 4. Payment procedure

Unofficial and improper payments to public officials are expressly prohibited, for obtaining licences, certificates and other services to which they have a legitimate right by ordinary procedures to expedite the performance of an action in their favour

## 5. Fair competition

We are fully, fairly and honestly committed to competing in markets, thus promoting free competition, which is in the best interest of our consumers, users and society in general

## 6. Contributing to NGOs

In collaborating with non-profit organisations, we do so by ensuring a clear mutual benefit and never as a means of concealing acts of corruption or bribery

## 7. Relationships with third parties and intermediaries

Our employees and managers maintain relationships with customers, partners and/or suppliers, based on a code of ethics of the highest standard of professionalism. We enforce ethical principles in our contractual agreements, including anti-corruption standards

## 8. Processing confidential information

We process the information of our customers, business partners, shareholders, investors and employees with the utmost discretion and confidentiality, strictly following our Privacy Policy, which is publicly available on our corporate website

## 9. Money laundering

We cooperate with the competent authorities in all countries in the fight against money laundering and terrorist financing, providing all requested information in accordance with applicable legal and regulatory standards

## 10. Record of transactions

We use an appropriate internal control system that we have implemented for the preparation of financial information, ensuring periodic monitoring of its effectiveness

## 11. Transparency assurance

We have a duty to provide truthful and complete information that adequately provides a fair view of the organisation's economic, financial and asset situation

## 12. Corruption between people

We oppose and penalise any act by which any of our members or collaborators promises, offers or grants an illegitimate benefit or advantage of any nature in order to favour themselves, a third party or another company

## 13. Bribery

We condemn any act by which an individual offers or grants remuneration of any kind to an authority, a public official or a person working in the public domain when the latter performs an act contrary to the functions inherent to his or her position or an act related to his or her position

## 14. Disclosure

We communicate and disseminate our Anti-Corruption Policy to all our employees and to any relevant third parties. They must formally commit to complying with the Code of Conduct and the policies and regulations of the organisation. We also hold training sessions on matters of compliance

## Crime Prevention Model

In addition, we have a **Crime Prevention Model** (CPM), developed according to national and international best practices of internal control, with input from employees and third parties.

The aforementioned CPM has been analysed by external auditors, who have confirmed that the operational effectiveness of the controls associated with the CPM is satisfactory. Therefore, **we have all the control measures to prevent and detect possible criminal acts that could be committed in each of the business units** and corporate departments, depending on the activity that is carried out.

In general, we use the Crime Prevention Model of the CIRSA Group to identify the main criminal risks likely to affect the Group, narrowing the scope and focusing it on Corruption.

The main risks identified are:

1. Corruption in business affairs
2. Illegal funding of political parties
3. Bribery
4. Influence peddling
5. Money laundering
6. Terrorism financing

These risks are associated with the main activities of the Group with the objective of preparing a Criminal Risks and Controls Matrix on which to base the Model. It includes as the main assessment variable the adequate operation of the controls associated with the CPM. Therefore, we have all the control measures to prevent and detect possible criminal acts that could be committed in each of the business units and corporate departments, depending on the activity that is carried out.

- The probability of occurrence
- The magnitude of the impact

In addition to the Matrix, in order for the Crime Prevention Model itself to be effective, it is also necessary to have an Assessment Model, in which to assess and classify the identified criminal risks. Finally, each identified and assessed risk has assigned a series of cross-divisional and other specific controls in order to mitigate its inherent risk to a residual risk located within the risk aversion limits defined by the Group. As a result of the analysis of the criminal acts that may potentially apply to the CIRSA Group based on its activities and taking into account the assessment model, **Heat Maps of Criminal Acts Risks** are obtained for the Group's lines of business.

## Training in compliance processes

In addition to the documents and support channels available to our employees, we also offer mandatory, virtual and in-person training courses to better prepare our team for potential actions contrary to our Code of Conduct or compliance policies. Specifically, we have achieved **201,000 cybersecurity training impacts**, including those related to raising awareness, phishing drills, learning modules and information leaflets. These impacts are expected to continue to increase in numbers through in-person training, on-demand videos and special training courses delivered during our cybersecurity month.

In 2022, we recorded **0 reportable cybersecurity incidents**. In addition, our employees most exposed to situations that may result in a breach of our Code of Conduct or compliance policies have received **10,195 training courses** on subjects of **anti-money laundering and anti-terrorism financing and general compliance and data protection and information security**. Our goal for 2023 is to update training to 100% of exposed employees.

## Cybersecurity and privacy

**CIRSA has been ranked in the first quartile and above the baseline in Blackstone's Annual Cybersecurity Review**, comprised of more than 100 different companies. This recognises our efforts to make cybersecurity and data privacy one of our top priorities.

Our cybersecurity programme has been in place for the past 13 years and is being reviewed and evaluated by a Blackstone cybersecurity team. It currently has a team of 9 people, including a Chief Information Security Officer (CISO). The programme has **three main objectives: to prevent fraud, to prevent data breach and to ensure business continuity and recovery**. In this regard, the cybersecurity measures we have implemented cover several fundamental aspects to ensure the strictest control.

In terms of our network, we highlight the implementation of state-of-the-art firewalls, as well as the Intrusion Detection System (IDS), which are connected to the most critical sectors for the company. User management is another key point for CIRSA's security that is strictly carried out by the company, so that

the permissions granted are in line with the needs of the work performed. Any exceptions must be approved and documented.

Leading solutions have also been implemented in other areas of security, such as the EDR solution, a leader in most published quadrants, or monitoring systems that allow for anomalous behaviours to be detected, allowing for a rapid response to prevent their unintended spread. All of this is operated by a highly qualified and continuously trained team to adapt their knowledge to the changing reality we face.

The organisation also conducts ongoing audits of its servers and applications, including new ecosystem additions. In 2022, nearly 2,000 audits were conducted. Critical projects are also audited by third-party companies, and the results have been satisfactory, confirming the good work done by the organisation.



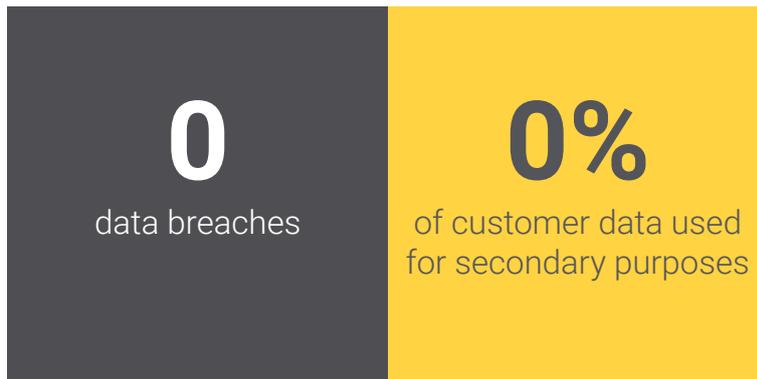
## Regarding privacy, CIRSA complies with applicable laws related to data protection and information security

In particular, **we guarantee the application of Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, as well as the national regulations of each country where we operate.** To ensure data protection in each of our markets, we take technical and operational measures to prevent the loss, misuse, alteration, unauthorised access and leakage of our customers' personal data, taking into account the technology used and the nature and risk exposure of the data.

We ensure that every new product and service offered meets the highest privacy standards, denoting a clear willingness to ensure the protection

of personal data. To this end, we have a firm commitment to continue working in full compliance with the regulations and, among the measures adopted, we appoint a Delegated Data Protection Commission, which ensures the implementation and strict compliance with Regulation (EU) 2016/679 throughout the Group. In addition, we implemented new internal processes that were executed throughout our facilities with the goal of ensuring the protection of the data of our customers, employees and collaborators.

In 2022, regarding matters of privacy, there have been zero data breaches and 0% of customer data has been used for secondary purposes.



## Our customers: Complaints management

At CIRSA, we analyse all types of user complaints and grievances through the ethical helpline channel. Complaints and grievances are received, having arrived through the specific channels by phone, email or chat on a daily basis. The recording and collection of these is done through a tool called **BKMS**, where data protection cases are received, and another tool called **JIRA** that records cases related to Sportium consumer complaints.

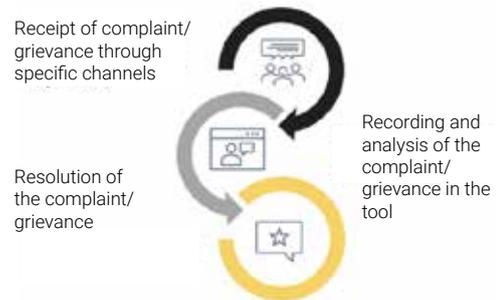
The investigation and identification period of the causes is 30 days, although depending on the number of cases and their complexity, the resolution period could be extended to an additional 60 days.

Once we have the customer's agreement with the resolution of the case, we proceed to close it.

Customer service teams are available in the various business areas to respond to any customer complaints.

**5**  
Grievances received in 2022, through BKMS, of which 4 have been closed and 1 is pending

**180**  
Grievances received in 2022, through JIRA, of which 166 were resolved in 2022 and the rest were satisfactorily resolved in January 2023



## Responsible supply chain

In 2022, we worked with **9,031 suppliers**, with a total contract value of **€373 million**. Of the total number of suppliers, **2,572 are certifiable\***. Not only do we ensure that our team strictly adheres to our Code of Conduct, but we also ensure that they are recognised and respected throughout our supply chain around the world. To do so, we have defined and established a certification process that includes a number of standards concerning compliance and code of ethics, which our current and future suppliers must meet. If a potential supplier does not have any Code of Conduct or Code of Ethics in place, we make sure they adhere to ours.

While no supplier audits have been conducted in 2022, the Company wishes to continue to advance this in the future. The Group has a purchasing policy that includes social, gender equality and environmental issues. As regards our supplier certification process, this is segmented according to the company name and/or activity of the supplier, and by evaluating their ESG aspects, whereby they must exceed our requirements.

Suppliers from Italy and Morocco are not included.

**2,572**  
certifiable suppliers

**1,247**  
certified suppliers

**€373 million**  
contract value

**82%**  
volume contracted by certified suppliers

\* Currently, we are working on the certification of 100% of our suppliers with an annual purchase value equal to or greater than €10,000.

At CIRSA, we promote **respect for Human Rights in all our business relationships**, as well as with our employees, customers, suppliers and collaborators. For this reason, we only collaborate with suppliers who share our values in upholding human rights.

More specifically, we are aligned with:

- The Universal Declaration of Human Rights
- The Labour Organisation's Declaration on Fundamental Principles and Rights at Work
- The United Nations' Guiding Principles on Business and Human Rights
- The OECD Guidelines for Multinational Enterprises
- Adherence to the United Nations Global Compact
- The European Convention on Human Rights



In this regard, we totally reject forced and child labour and protect the general interest of society, as well as the rights of children. Therefore, **we take the necessary measures to avoid the acquisition of any service or product that implies this type of labour in any of our markets and countries in which we operate**, establishing compliance mechanisms once we get to know our potential suppliers and collaborators.



0

reported cases of human rights violations

## APPENDIX

### 2022 KPIs

Year 2021 is conditioned by the strong restrictions derived from Covid-19, representing 70% in productive hours compared to 2022 with practically 100% activity.

The 2021 KPIs have been adjusted to the consolidation criteria applied in 2022.

### Environmental KPIs

		2021	2022
<b>Consumption</b>	Total water consumption (m <sup>3</sup> )	510,044	512,917
	Average water consumption (m <sup>3</sup> ) per gaming hall	1,259	1,254
	Average water consumption (m <sup>3</sup> ) per m2	1.56	1.49
	Total power consumption (kWh)	159,275,763	186,981,332
	Total fuel consumption (Kwh)	31,792,680	35,728,145
	Average energy consumption (kWh) per gaming hall	393,273	457,167
	Percentage of renewable energy consumption	44%	66%
<b>Emissions</b>	Greenhouse gas emissions (Scope 1) tCO <sub>2</sub> e	15,076	12,924
	Greenhouse gas emissions (Scope 2 market-based) tCO <sub>2</sub> e	21,154	16,391
	Greenhouse gas emissions (Scope 2 location-based) tCO <sub>2</sub> e	31,741	34,970
	Greenhouse gas emissions per gaming hall (tCO <sub>2</sub> e)	89.4	71.6
	Greenhouse gas emissions per m2 (tCO <sub>2</sub> e)	0.11	0.08
<b>Waste</b>	Hazardous waste (tonnes)	< 20	< 20
	Non-hazardous waste (tonnes)*	386	870
	Corporate and manufacturing recycled waste	91%	91%

\* In 2022 there will be greater traceability in waste management.

## Social KPIs

		2021	2022	
<b>Employee wellbeing</b>	Total number of employees	12.311	13.338	
	Staff rotation index	25,9%	35,2%	
	Training hours by professional category	See Table 1 below	See Table 1 below	
	Percentage of women in management development programmes	49%	50%	
	Accidents	187	283	
	Frequency rate	Not reported	11,29	
	Severity rate	Not reported	0,19	
	Number of occupational diseases	0	0	
<b>Responsible Gaming</b>	Number of facilities certified as Responsible Gaming	10,170	12,425	
	Number of self-exclusions (online gaming)	25,584	35,496	
	Number of established betting limits (online gaming)	2.044	2.738	
	Number of risk situations proactively detected through monitoring systems	512	468	
<b>Company</b>	Total taxes on gaming activity and corporate taxes (€M)	> 470	662	
<b>Equality, Diversity and Inclusion</b>	Number of employees by professional category, age and country	See Tables 2, 3 and 4 below	See Tables 2, 3 and 4 below	
	Number of women in a management position in gaming halls	181	187	
	Percentage of women in a management position in gaming halls	42%	43%	
	Internal promotion rate	99%	95%	
	Number of nationalities	55	59	
	Percentage of female employees	49%	49%	
	Percentage of women employed in Latin America	57%	56%	
	Number of employees with disabilities	115	123	
	<b>Suppliers</b>	Number of certified suppliers	Not reported	2.572
		Total value of supplier contracts (€M)	243	373
Number of certified suppliers		Not reported	1.247	
% contracting volume of certified suppliers		Not reported	82%	
<b>Customers</b>	Number of complaints/grievances received	Not reported	185	

Table 1

Training hours by professional category

	2021	2022
Management	2,447	4,214
Support staff	12,625	37,295
Marketing staff	1,028	4,648
Indirect gaming halls staff	11,122	16,183
Direct gaming halls staff	241,644	801,965
<b>TOTAL</b>	<b>268,866</b>	<b>864,305</b>

Table 2

Total number of employees per country

	2021	2022
Spain	4,423	4,434
Colombia	2,549	2,772
Mexico	1,772	2,057
Panama	1,246	1,247
Dominican Republic	803	818
Peru	792	797
Italy	39	522
Morocco	365	357
Costa Rica	322	334
<b>TOTAL</b>	<b>12,311</b>	<b>13,338</b>

Table 3

Total number of employees by age

	2021	2022
< 30	2,768	3,339
30-50	7,371	7,768
Over 50	2,172	2,231
<b>TOTAL</b>	<b>12,311</b>	<b>13,338</b>

Table 4

Total number of employees by professional category

	2021	2022
Management	739	769
Support staff	1,512	1,703
Marketing staff	359	381
Indirect gaming halls staff	2,977	3,203
Direct gaming halls staff	6,724	7,282
<b>TOTAL</b>	<b>12,311</b>	<b>13,338</b>

Appendix page 41

Total number of employees by type of contract, age and gender

	2022					
	< 30		30 - 50		> 50	
	Women	Men	Women	Men	Women	Men
Indefinite	1,815	1,345	3,707	3,729	708	1,440
Full-time	1,815	1,342	3,576	3,537	708	1,440
Part-time	0	3	131	192	0	0
Temporary	79	100	144	188	31	52
Full-time	79	100	123	175	31	52
Part-time	0	0	21	13	0	0
<b>TOTAL</b>	<b>1,894</b>	<b>1,445</b>	<b>3,851</b>	<b>3,917</b>	<b>739</b>	<b>1,492</b>

Total number of employees by type of contract and professional category

	2022				
	Management	Support staff	Marketing staff	Indirect gaming halls staff	Direct gaming halls staff
Indefinite	768	1,661	378	3,130	6,807
Full-time	768	1,661	378	2,998	6,613
Part-time	0	0	0	132	194
Temporary	1	42	3	73	475
Full-time	1	42	3	73	441
Part-time	0	0	0	0	34
<b>TOTAL</b>	<b>769</b>	<b>1,703</b>	<b>381</b>	<b>3,203</b>	<b>7,282</b>

## Governance KPIs

		2021	2022
<b>Board of Directors</b>	Number of Board of Directors meetings	7	9
	Tenure of the Executive Presidency (years)	15	16
<b>Training in matters of governance</b>	Number of employees who receive and complete training courses on subjects of anti-corruption, anti-money laundering and compliance	4,264	10,195
<b>Cybersecurity</b>	Number of data breaches	0	0
	Percentage of customer data used for secondary purposes	0%	0%
	Number of training impacts in the field of cybersecurity	135,000	201,000
<b>Compliance</b>	Number of confirmed cases of bribery or corruption	0	0
	Number of reported cases of human rights violations	0	0
<b>Taxation</b>	Value of donations to non-profit organisations (€)	978,063	443,060
	Profits obtained country by country (thousands of €)	Table 5	Table 5
	Taxes on profits paid (thousands of €)	Table 6	Table 6
	Public grants received (thousands of €)	0	0

Table 5

Profits obtained country by country (thousands of €)

Countries	2021	2022
Spain	-102,175	13,942
Colombia	-772	27,405
Mexico	-19,137	1,938
Panama	-954	28,203
Dominican Republic	6,650	15,550
Peru	-16,269	-2,740
Italy	-15,394	11,749
Morocco	-4,696	10,375
Costa Rica	-5,580	2,787
<b>TOTAL</b>	<b>-158,327</b>	<b>109,209</b>

Table 6

Taxes on profits paid (thousands of €)

Countries	2021	2022
Spain	4,031	14,564
Colombia	4,823	9,887
Mexico	-25	337
Panama	1,489	10,081
Dominican Republic	0	0
Peru	0	6
Italy	-4	84
Morocco	0	0
Costa Rica	-165	325
<b>TOTAL</b>	<b>10,149</b>	<b>35,284</b>

# GRI content index

<b>Statement of Use</b>	CIRSA has submitted the information listed in this index of GRI content for the period from 01 January 2022 to 31 December 2022, using the GRI Standards as a reference
<b>Applicable GRI Sector Standards</b>	Not applicable

GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
1	Fundamentals 2021	Appendix: GRI indicators	66

## THE ORGANISATION AND ITS REPORTING PRACTICES

GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
2-1	Organisational details	a) 1. Message from the Chairman b) 2. About this Report c) Contact information d) 3. About us	4, 7, 15, 77
2-3	Report period, frequency and point of contact	a) GRI indicators b) 2. About this Report c) 2. About this Report d) Contact information	7, 66, 77
2-5	Internal verification	Voluntary verification	

## ACTIVITIES AND EMPLOYEES

GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
2-6	Activities, value chain and other business relationships	a) 3. About us: Our business activity b) 3. About us: Our business activity b) 7. Corporate Governance and regulatory compliance Actions and results	13, 14, 15, 61
2-7	Employees	a) 6. Social: The CIRSA team b) i) 6. Social: The CIRSA team b) ii) 6. Social: The CIRSA team b) iv) 6. Social: The CIRSA team b) v) 6. Social: The CIRSA team e) 6. Social: The CIRSA team	43, 44, 45

GOVERNANCE			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
2-9	Governance structure and composition	a) 7. Corporate Governance and regulatory compliance	52, 53, 54
2-11	Chairman of the senior governing body	a) 7. Corporate Governance and regulatory compliance b) a) 7. Corporate Governance and regulatory compliance	54
2-12	Role of the senior governing body in monitoring impact management	a) 1. Message from the Chairman c) 1. Message from the Chairman	4
2-13	Delegation of responsibility for impact management	a) 1. Message from the Chairman c) 1. Message from the Chairman	4
2-14	Role of the senior governing body in sustainability reporting	a) 2. About this report; 7. Corporate Governance and regulatory compliance: Goal and strategy	54

STRATEGY, POLICIES AND PRACTICES			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
2-22	Statement on the strategy for sustainable development	a) 1. Message from the Chairman	4, 5
2-23	Commitments and policies	a) 3. About us b) 7. Corporate Governance and regulatory compliance e) 7. Corporate Governance and regulatory compliance	17, 54, 61
2-24	Incorporation of commitments and policies	a) i 1. Message from the chairman; 3. About us a) iv 1. Message from the chairman; 23. About us; 6. Social: The CIRSA team	4, 13, 17, 44, 45
2-25	Processes for remedying negative impacts	1. Message from the chairman 7. Corporate Governance and regulatory compliance. In all areas, any impact on sustainability and how it is managed is minimised and evaluated.	4, 5, 61
2-26	Mechanisms for seeking advice and raising concerns	a) ii 7. Corporate Governance and regulatory compliance	61
2-27	Compliance with laws and regulations	a) ii 7. Corporate Governance and regulatory compliance	52, 55
2-28	Affiliation to associations	a) 4. Responsible gaming	28

STAKEHOLDER PARTICIPATION			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
2-29	Focus for stakeholders' engagement	a) 6. Social: Our contribution to society	49
2-30	Collective bargaining agreements	a) 6. Social: The CIRSA team	40, 41

CONTENT ON MATERIAL TOPICS			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
3-1	Process of determining material topics	a) 2. About this Report b) 2. About this report	8, 9, 10
3-2	List of material topics	a) 2. About this report b) 2. About this report	11
3-2	Managing material topics		25, 26, 27, 30, 31, 33, 35, 39, 46

#### MATERIAL TOPICS

SAFE GAMING			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
416-1	Assessment of health and safety impacts of the categories of products or services	4. Responsible gaming	26
417-1	Requirements for the information and tagging of products and services	a) iii 4. Responsible gaming	26
417-2	Cases of non-compliance related to the information and tagging of products and services	Not applicable Due to the activity and sector of the Group	
417-3	Cases of non-compliance related to marketing communications	Not applicable Due to the activity and sector of the Group	

CYBERSECURITY AND DATA PROCESSING			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
418-1	Substantiated claims regarding customer privacy breaches and loss of customer data	7. Corporate Governance and regulatory compliance	60

CORRUPTION, BRIBERY AND MONEY LAUNDERING			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
205-1	Operations assessed for corruption-related risks	b) 7. Corporate Governance and regulatory compliance	56, 57, 58
205-2	Communication and training on anti-corruption policies and procedures	b) 7. Corporate Governance and regulatory compliance	53
205-3	Confirmed cases of corruption and actions taken	b) 7. Corporate Governance and regulatory compliance	55

IMPACT OF LOCAL COMMUNITIES			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
413-1	Operations with local community's involvement, impact assessments and development programmes	a) iv 7. Corporate Governance and regulatory compliance a) vii 6. Social: The CIRSA team a) viii 7. Corporate Governance and regulatory compliance	42, 52, 53, 54

TALENT MANAGEMENT AND WORKING CONDITIONS			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
201-3	Defined benefits plan and other retirement plan obligations	Not applicable The Group does not have a defined benefits plan or other retirement plans.	
401-1	New employee hirings and turnover of personnel	b) 6. Social: The CIRSA team	43
401-2	Benefits for full-time employees not given to part-time or temporary employees	b) 6. Social: The CIRSA team	42, 46
404-1	Average hours of training per year per employee	b) 6. Social: The CIRSA team	44
404-2	Programmes for improving employee skills and transition assistance programmes	b) 6. Social: The CIRSA team	44, 45, 46

OCCUPATIONAL HEALTH AND SAFETY			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
403-1	Occupational health and safety management system	6. Social: The CIRSA team Compliance with prevention regulations	42
403-2	Hazard identification, risk assessment and incident investigation	a) 6. Social: The CIRSA team	42
403-3	Occupational health services	6. Social: The CIRSA team Compliance with prevention regulations	42
403-4	Employees' participation, consultation and communication regarding occupational health and safety	a) 6. Social: The CIRSA team b) 6. Social: The CIRSA team	42
403-5	Training of employees in occupational health and safety	a) 6. Social: The CIRSA team	42
403-6	Promoting the employees' health	a) 6. Social: The CIRSA team	47
403-7	Prevention and mitigation of impacts on the employees' health and safety directly	a) 6. Social: The CIRSA team Occupational Risk Prevention Policy	42
403-8	Coverage of the occupational health and safety management system	6. Social: The CIRSA team Compliance with prevention regulations	42
403-9	Work-related injuries	a) iii Social: The CIRSA team Rate accidents	42
403-10	Occupational sicknesses and illnesses	a) 6. Social: The CIRSA team	42

OUTSIDE EMPLOYEES' WORKING CONDITIONS			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
401-2	Benefits for full-time employees not given to part-time or temporary employees	a) 6. Social: The CIRSA team	42, 46

EQUALITY, DIVERSITY AND INCLUSION			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
405-1	Diversity in governing bodies and employees	a) 6. Social: The CIRSA team	38

ENERGY CONSUMPTION			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
302-1	Energy consumption within the organisation	a) 5. Environment a) 2022 KPIs b) 5. Environment The data is shown in Kwh, not Joules.	32, 33, 63
302-3	Energy intensity	a) 5. Environment b) 5. Environment c) includes electricity and fuel consumption (includes natural gas, propane, butane, diesel, LPG (liquefied petroleum gas) and petrol)	32
302-4	Reduced energy consumption	a) 5. Environment b) 5. Environment c) 3. About us	18, 32, 33, 34

GREENHOUSE GAS (GHG) EMISSIONS			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
305-1	Direct GHG emissions (scope1)	a) 5. Environment b) CO2 (gas included in calculations) e) 5. Environment g) 5. Environment	34
305-2	Indirect GHG emissions from generating energy (Scope 2)	a) 5. Environment b) 5. Environment e) 5. Environment g) 5. Environment	34
305-4	Intensity of GHG emissions	a) 5. Environment b) 5. Environment	34
305-5	Reduction of GHG emissions	d) 5. Environment	33

DIGITISATION AND INNOVATION			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
418-1	Substantiated claims regarding customer privacy breaches and loss of customer data	7. Corporate Governance and regulatory compliance	60

WASTE MANAGEMENT AND CIRCULAR ECONOMY			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
306-2	Managing significant impacts regarding waste	a) 5. Environment b) 5. Environment	35
306-3	Waste generated	a) 5. Environment b) 5. Environment	35

USE OF RESOURCES (FOOD, MATERIALS...)			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
301-1	Materials used by weight and volume	Not applicable because of the Group's activity	
304-1	Operational centres in owned, leased or managed property, located within or adjacent to protected areas or areas of high biodiversity value	Not applicable There are no operational centres owned by the Group adjacent to protected areas	

BUSINESS ETHICS AND GOVERNANCE			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
201-1	Direct economic value generated and distributed	a) 6. Our contribution to society a) 2022 KPIs	49, 65
201-2	Financial implications and other risks and opportunities arising from climate change	a) 5. Environment	30, 31, 35
201-4	Financial assistance received from the government	2022 KPIs CIRSA has not received any amounts associated with public grants.	65
203-1	Investments in supported infrastructure and services	a) 6. Social: Our contribution to society b) 6. Social: Our contribution to society	49, 50

GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
203-1	Investments in supported infrastructure and services	a) 6. Social: Our contribution to society b) 6. Social: Our contribution to society	49, 50
203-2	Significant indirect economic impacts	a) 6. Social: Our contribution to society	49, 50
204-1	Proportion of spend on local suppliers	a) 7. Corporate Governance and regulatory compliance	61
206-1	Legal actions related to unfair competition and monopolistic practices or practices against free competition	There were no claims for unfair competition, monopolistic practices or practices against free competition in 2022	
207-4	Reporting country by country (Version 2019): with regard to the following sections: a, b.i, b.ii, b.iii, b.vi, b.viii, c	a) 6. Social: Our contribution to society b) iii 6. Social: The CIRSA team b) vi 2022 KPIs b) ix 2022 KPIs	39, 40, 50, 65
308-1	New suppliers that have passed through evaluation and selection filters in accordance with environmental criteria	a) 7. Corporate Governance and regulatory compliance	61
308-2	Negative environmental impacts in the supply chain and actions taken	a) 7. Corporate Governance and regulatory compliance	52
406-1	Cases of discrimination and corrective actions taken	There were no cases of discrimination in the 2022 fiscal year	
408-1	Operations and suppliers where there are a significant risk of cases of child labour	a) 7. Corporate Governance and regulatory compliance Code of Ethics and Code of Conduct	61, 62
409-1	Operations and suppliers where there is a significant risk of cases of forced labour	a) 7. Corporate Governance and regulatory compliance Code of Ethics and Code of Conduct	61, 62
411-1	Cases of violations of indigenous peoples' rights	Not applicable There are no cases of violations of indigenous peoples' rights, because the Group does not operate in such relevant locations	
414-1	New suppliers that have passed through evaluation and selection filters in accordance with social criteria	a) 7. Corporate Governance and regulatory compliance	61
415-1	Contributions to political parties and/or representatives	Not applicable The Group does not make contributions to political parties and/or representatives	
419-1	Non-compliance with laws and regulations in the social and economic environments	a) 7. Corporate Governance and regulatory compliance	52, 62

RELATIONSHIP WITH CONSUMERS			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
416-1	Assessment of health and safety impacts of the categories of products or services	4. Responsible gaming	26

WATER CONSUMPTION AND MANAGEMENT			
GRI	DESCRIPTION	LOCATION AND NOTES	PAGE
303-5	Water consumption	a) 5. Environment Data is shown in m <sup>3</sup> , not in Megalitres.	32

# List of CIRSA consolidated group companies

## LIST OF SUBSIDIARIES COMPANIES

Company	Activity	Percentage stake 2022	Percentage stake 2021	Company	Activity	Percentage stake 2022	Percentage stake 2021
Ajar, S.A.	Bingos	75%	75%	Giga Game System Operation, S.L.	Operational	100%	100%
Alfematic, S.A.	Operational	75%	50%	Global Bingo Corporation, S.A.	Bingos	100%	100%
Amical Trading, S.L.	Operational	77%	77%	Global Bingo Madrid, S.A.	Bingos	100%	100%
Ancon Entertainment, INC.	Casinos	50%	50%	Global Bingo Stars, S.A.	Bingos	100%	100%
Apple Games 2000 S.L.	Operational	50%	50%	Global Casino Technology Corporation, S.A.	Casinos	100%	100%
Apuestas Electrónicas, S.L.	Operational	76%	76%	Global Game Machine Corporation, S.A.	Operational	100%	100%
Atlántic Pecunia, S.A.R.L.	Casinos	100%	-	Global Management Tangier, S.R.L.	Casinos	100%	-
Automáticos Manchegos, S.L.	Operational	51%	51%	Global Real State, S.A.S.	Casinos	100%	100%
Automaticos Maxorata, S.A.	Operational	55%	55%	Gogoal, S.R.L.	Betting	60%	-
Automáticos Quintana, S.L.	Operational	50%	50%	Goldenplay, S.L.	Operational	51%	51%
Azibi Horta, S.A.	Bingos	100%	100%	Grael, S.L.	Operational	100%	100%
Badamatic, S.A.	Operational	51%	51%	Gran Casino Costa Brava, S.L.	Casinos	90%	90%
Bar Juegos, S.L.	Bingos	100%	100%	Gran Casino de las Palmas, S.A.	Casinos	51%	51%
Barnabing, S.A.	Bingos	100%	100%	Grasplai, S.A.	Bingos	100%	100%
Barna-Center, S.A.	Operational	100%	100%	Grevaloflal, S.A.	Bingos	100%	100%
Bema - Euromatic, S.A.	Operational	61%	61%	Grupo Cirsa de Costa Rica, S.A.	Casinos	100%	100%
Bet On Red Digital, S.A.	Betting	100%	100%	Haes, S.A.	Bingos	100%	100%
Bicondal, S.A.	Bingos	100%	100%	Iber Matic Games, S.L.	Operational	76%	76%
Billares Valencia, S.L.	Operational	100%	100%	Illa Valles Hosteleria, S.L.	Operational	100%	100%
Binale, S.A.	Bingos	100%	100%	Integración Inmobiliaria World de Mexico, S.A. de C.V.	Bingos	100%	100%
Bincamex, S.A. de C.V.	Bingos	100%	100%	International Bingo Technology, S.A.	Bingos	100%	100%
Bincano, S.A.	Bingos	100%	100%	International Mex Business, S.L.	Bingos	100%	100%
Bingo Santven, S.A.	Bingos	100%	100%	Interplay, S.A.	Operational	76%	76%
Bingos Andaluces, S.A.	Bingos	100%	100%	Interservi, S.A.	Operational	51%	51%
Bingos Benidorm, S.A.	Bingos	100%	100%	Inversiones Interactivas, S.A.	Casinos	70%	70%
Bingos de Madrid Reunidos, S.A.	Bingos	100%	100%	Inversiones Pacanoas, S.A.	Casinos	70%	70%
Bis Line, S.L.	Operational	88%	88%	Inversiones Pañanitas, S.A.	Casinos	70%	70%
Calpe Leisure, S.A.	Operational	85%	85%	Inversiones Vertiago, S.A.	Casinos	70%	70%
Candan, S.A.	Operational	100%	100%	Inversiones Zental, S.L.	Bingos	100%	100%
Casino CIRSA Valencia, S.A.	Casinos	100%	100%	Investment & Securities Iberica, S.A.	Casinos	100%	100%
Casino Management, S.A.R.L.	Casinos	75%	-	Juegomatic, S.A.	Operational	100%	100%
Casino Nueva Andalucía Marbella, S.A.	Casinos	100%	100%	Juegos De Azar Oliva Rodon, S.L.	Operational	100%	100%
Casinos del Caribe, S.R.L.	Casinos	100%	100%	Juegos Del Oeste, S.L.	Operational	76%	76%
Cat Games, S.L.	Operational	60%	60%	La Barra Ancon, S.A.	Casinos	50%	50%
CIRSA Finance International, S.A.R.L.U.	Structure	100%	100%	La Barra Panama, S.A.	Casinos	100%	100%
CIRSA Gaming Corporation, S.A.	Structure	100%	100%	La Selva Inversiones, S.A.C.	Casinos	-	100%
CIRSA Interactive Corporation, S.L.	B2B	100%	100%	Les Loisirs Du Paradis, S.A.R.L.	Casinos	82%	82%
CIRSA Intenational Business Corporation, S.L.	Casinos	100%	100%	L&G Bussines, S.L.	Operational	100%	100%
CIRSA Italia Holding, S.P.A.	Operational	100%	100%	Lightmoon International 21 S.L.	Operational	100%	100%
CIRSA Italia, S.P.A.	Operational	100%	100%	Lista Azul, S.A.	Bingos	100%	100%
CIRSA Retail, S.R.L.	Bingos	100%	100%	Macrojuegos, S.A.	Bingos	51%	51%
CIRSA Servicios Corporativos, S.L.	Structure	100%	100%	Majestic 507 Corp, S.A.	Casinos	50%	50%
CIRSA Slot Corporation, S.A.	Operational	100%	100%	Maquilleiro, S.L.	Operational	100%	100%
CIRSA Tecnologias de la Información, S.L.	Structure	100%	100%	Maqui-Ter, S.A.	Operational	100%	51%
Cirsagest, S.P.A.	Operational	100%	100%	Marchamatic Indalo, S.L.	Operational	51%	51%
Club Privado De Fumadores Nuestro Espacio	Bingos	100%	100%	Merengue Bar Gran Casino Jaragua, GCJ, S.R.L.	Casinos	100%	100%
Coin Machines, S.A.	Operational	100%	100%	Miky, S.L.	Operational	100%	100%
Coinland, S.A.	Operational	100%	100%	Montri, S.A.	Operational	76%	76%
Comdibal 2000 S. L.	B2B	100%	100%	New Laomar, S.L.	Operational	51%	51%
Comercial de Desarrollos Electrónicos, S.A.	Operational	100%	100%	New York Game, S.L.	Operational	100%	100%
Comercial de Recreativos Salamanca, S.A.	Operational	76%	76%	Nightfall Construccions, S.R.L.	Casinos	100%	100%
Comercial Jupama, S.A.	Operational	50%	50%	Oper Ibiza, S.L.	Operational	51%	51%
Cotecnic 2000, S.L.	Operational	100%	100%	Operadora de Entretenimiento Manzanillo, S.A. de C.V.	Bingos	100%	60%
Digital Gaming México, S.A.P.I. de C.V.	Betting	100%	100%	Operadora General de Entretenimiento, S.A. de C.V.	Betting	100%	-
Egartronic, S.A.	Operational	76%	76%	Operadora Internacional de Recreativos, S.A.	Operational	51%	51%
Electrónicos Radisa, S.L.	Operational	100%	100%	Orbis Development, S.A.	Casinos	100%	100%
Eleva, Electronicos Valencia, S.A.	Operational	100%	100%	Orlando Italia, S.R.I.	Operational	51%	51%
E-Play 24 Ita Limited	Betting	60%	-	Orlando Play, S.A.	Operational	51%	51%
E-Play 24 Italia, S.R.L.	Betting	60%	-	Palabingo, S.R.L.	Bingos	100%	100%
E-Play 24 Retail, S.R.L.	Betting	60%	-	Piscis 28 Castilla y León, S.L.	Operational	100%	100%
Flamingo Euromatic-100, S.L.	Operational	51%	51%	Playcat, S.A.	Bingos	100%	100%
Fomento Advenio 1, S.A. de C.V.	Bingos	100%	100%	Playspace, S.L.	Betting	100%	100%
Galon Business, S.L.	Casinos	100%	100%	Princesa 31, S.A.	Bingos	100%	100%
Gaming & Services de Panamá, S.A.	Casinos	100%	100%	Promociones e Inversiones de Guerrero, S.A.P.I. de C.V.	Bingos	100%	100%
Gaming & Services, S.A.C.	Casinos	100%	100%	Promociones Sol Ibiza, S.A.	Operational	51%	51%
Garbimatic, S.L.	Operational	75%	50%	Radiamón, S.L.	Operational	51%	51%
Garrido Player, S.L.	Operational	100%	100%	Reactive Games Software Solutions Limited	Betting	60%	-
Gema, S.R.L.	Bingos	100%	100%	Recrea, S.L.	Operational	80%	80%
Genper, S. A.-J	Operational	100%	100%	Recreativos Arranz, S.L.	Operational	100%	100%

# List of CIRSA consolidated group companies

## LIST OF SUBSIDIARIES COMPANIES

Company	Activity	Percentage stake 2022	Percentage stake 2021	Company	Activity	Percentage stake 2022	Percentage stake 2021
Recreativos Galicia - Sanabria, S.L.	Operational	100%	-	Talluntxe, S.A.	Bingos	100%	100%
Recreativos Hatuey, S.A.	Operational	100%	100%	Talzen Inversions, S.L.	Bingos	100%	100%
Recreativos Manchegos, S.L.	Operational	51%	51%	Tecnijoc, S.L.	Operational	76%	76%
Recreativos Ociomar Levante, S.L.	Operational	51%	51%	Tecnoappel, S.L.	Operational	76%	76%
Recreativos Panaemi, S.L.	Operational	51%	51%	Tecnología y Sistemas, S.A.	Operational	100%	100%
Recreativos Xativa, S.A.	Operational	55%	55%	Tefle, S.A.	Bingos	100%	100%
Red de Interconexión de Andalucía, S.L.	B2B	100%	100%	Telma Enea, S.L.	Bingos	100%	100%
Red de salones de Aragón, S.L.	B2B	100%	100%	Teo Servicios Corporativos Slots, S.L.	Operational	100%	100%
Resort Paradise AB	Casinos	82%	82%	Thousand And One Nights, AB	Casinos	75%	-
Romgar, S.L.	Bingos	100%	100%	Tres Rios Hotel la Carpintera, S.A.	Casinos	100%	100%
S.A. Explotadora de Recreativos	Operational	90%	90%	Unidesa Operations Services, S.I.	B2B	100%	100%
Sadeju, S.L.	Bingos	65%	65%	Uniplay, S.A.	Operational	100%	100%
Sala Valencia, S.A.	Bingos	100%	100%	Universal de Desarrollos Electrónicos, S.A.	B2B	100%	100%
Sala Versalles, S.A.	Bingos	100%	100%	Universal de Desarrollos Electrónicos, S.A. de C.V.	B2B	100%	100%
Sant Cugat Desarrollo de Tecnologías, S.L.	B2B	100%	100%	Urban Leisure, S.L.	Operational	75%	75%
Santbar, S.I.	Operational	100%	-	Verneda 90, S.A.	Bingos	100%	100%
Saturno 5 Conexión, S.L.	Operational	100%	100%	Winner Group, S.A.	Casinos	50%	50%
SCB Almirante Dominicana, S.R.L.	Casinos	100%	100%	Yellow City Limited	Betting	60%	-
SCB Anil Dominicana, S.R.L.	Casinos	100%	100%	Yumbo San Fernando, S.A.	Bingos	100%	100%
SCB Grand Victoria Dominicana, SRL	Casinos	100%	100%				
SCB Hispaniola Dominicana, S.R.L.	Casinos	100%	100%				
SCB Malecon Dominicana, S.A.	Casinos	100%	100%				
Sertebi, S.A.	Bingos	100%	100%				
Servi D' Aro, S.A.	Bingos	100%	100%				
Servi-Joc, S.A.	Operational	85%	85%				
Sobima, S.A.	Bingos	100%	100%				
Social Games Online, S.L.	Betting	100%	100%				
Societe Du Casino Le Mirage, S.A.	Casinos	51%	51%				
Sodemar, S.L.	Bingos	100%	100%				
Sport Tech Peru, SAC	Betting	100%	-				
Sportium Apostes Catalunya, S.A.	Betting	100%	100%				
Sportium Apuestas Andalucía, S.L.	Betting	100%	100%				
Sportium Apuestas Aragon, S.L.	Betting	100%	100%				
Sportium Apuestas Asturias, S.A.	Betting	100%	100%				
Sportium Apuestas Baleares, S.L.	Betting	100%	100%				
Sportium Apuestas Canarias, S.L.	Betting	100%	100%				
Sportium Apuestas Castilla La Mancha, S.L.	Betting	100%	100%				
Sportium Apuestas Ceuta, S.L.	Betting	100%	100%				
Sportium Apuestas Colombia, S.A.S.	Betting	50%	50%				
Sportium Apuestas Deportivas, S.A.	Betting	100%	100%				
Sportium Apuestas Digital, S.A.	Betting	100%	100%				
Sportium Apuestas Galicia, S.L.	Betting	100%	100%				
Sportium Apuestas Levante, S.A.	Betting	100%	100%				
Sportium Apuestas Melilla, S.L.	Betting	100%	100%				
Sportium Apuestas Navarra, S.A.	Betting	100%	100%				
Sportium Apuestas Oeste, S.A.	Betting	100%	100%				
Sportium Apuestas Panama, S.A.	Betting	100%	100%				
Sportium Dominicana, SRL	Betting	100%	-				
Sportium Global Investments, SGI, S.A.	Betting	100%	100%				
Sportium Portugal, SA	Betting	100%	-				
Sportium Puerto Rico, LLC	Betting	55%	-				
Sportium Servicios de Gestión, S.L.	Betting	100%	100%				
Sportium Zona Norte, S.A.	Betting	100%	100%				

## LIST OF ASSOCIATED COMPANIES

Company	Activity	Percentage stake 2022	Percentage stake 2021
AOG, S.r.l.	Bingos	50%	50%
Automaticos Felcarras, S.L.	Operational	50%	-
Audiovisual Fianzas, S.G.R.	Structure	6%	6%
Binsavo, S.A.	Bingos	50%	50%
Casino la Toja, S.A.	Casinos	50%	50%
Compañía Europea de Salones Recreativos, S.L.	B2B	20%	20%
Competiciones Deportivos, S.A.	Casinos	50%	50%
Felix Jimenez Morante, S.A.	Operational	50%	50%
Majestic Food Services, S.A.	Casinos	50%	50%
Montecarlo Andalucía, S.L.	Bingos	50%	50%
Opa Services, S.r.l.	Bingos	30%	30%
Recreativos Oropesa, S.L.	Operational	50%	50%
Serdisga 2000, S.L.	B2B	50%	50%
Unión de Operadores Reunidos, S.A.	Operational	50%	50%



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