

# NOVOMATIC AG

CODE OF CONDUCT | SUPPLIERS





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# Code of Conduct for Suppliers

## Foreword

As Europe's largest gaming technology group and one of the world's leading full-service providers in the gaming industry, the NOVOMATIC AG Group and its affiliated companies\* (collectively "NOVOMATIC") are committed to ethical, lawful and socially responsible corporate governance by adhering to the principles laid out in NOVOMATIC'S Code of Conduct.

It is therefore also the responsibility of NOVOMATIC, as a gaming technology group with a high level of materials expertise, to ensure that the raw materials, goods and services sourced from suppliers worldwide are in accordance with international standards in order to ensure compliance throughout the entire value chain of NOVOMATIC products. In its procurement activities, NOVOMATIC pays attention not only to procedural, economic and technical criteria, but also to the observance of social and ecological aspects such as human rights, working conditions, prevention of corruption and environmental protection.

NOVOMATIC expects its suppliers to comply with applicable national and international laws, the principles of the UN Global Compact, the Agenda 2030 and its Sustainable Development Goals (SDGs), the NOVOMATIC Code of Conduct and this Supplier Code of Conduct, which is strictly based on the principles of the NOVOMATIC Code of Conduct, when conducting business. They are furthermore expected to establish appropriate processes that support compliance with applicable laws in their companies and promote continuous improvement with respect to the principles and requirements of the NOVOMATIC Code of Conduct and the Supplier Code of Conduct.

NOVOMATIC also expects suppliers to in turn ensure that their employees, affiliates, agents and suppliers with whom they work to supply raw materials, goods and services to NOVOMATIC recognize and comply with these requirements.

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\* For the purposes of this Code of Conduct, "affiliated companies" are companies in which the other company directly or indirectly owns at least fifty percent (50 %) of the voting share capital.

NOVOMATIC values long-term business relationships. In the event of violations of this Code of Conduct by suppliers, NOVOMATIC reserves the right to derive appropriate consequences. This can lead to a reduction or termination of the business relationship, up to and including suspension.

Every supplier is obliged to comply with this Supplier Code of Conduct. The compliance with this Code of Conduct may be part of an audit by NOVOMATIC or by an independent third-party auditor commissioned by NOVOMATIC. By accepting the NOVOMATIC purchase order, the supplier confirms that he accepts the content of the Supplier Code of Conduct, complies with it and is not aware of any violations of this Code of Conduct.

Thank you for your support.

Gumpoldskirchen, March 2024

**Ryszard Presch**

**Johannes Gratzl**

**Stefan Krenn**

Board Members NOVOMATIC AG

# Ethical Business Conduct

In order to assume social responsibility, suppliers are expected to act ethically and with integrity. NOVOMATIC's ethical requirements for suppliers include the following aspects:

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## Compliance with laws and regulations

NOVOMATIC expects suppliers to comply with all applicable national and international laws and regulations, including the standards issued by the International Labour Organization (the "ILO"), the United Nations Universal Declaration of Human Rights, industry standards and all other relevant legal requirements, in the course of their business.

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## Integrity in business dealings

NOVOMATIC expects suppliers to prohibit and neither practice nor tolerate corruption, extortion, fraud or embezzlement in any form. All of the suppliers' business processes should be transparent and correctly reflected in the respective business documents.

NOVOMATIC expects suppliers to neither offer nor accept or be promised any bribes, gifts or other means of obtaining an improper or inappropriate advantage. Invitations and gifts to NOVOMATIC employees or persons close to them are only granted if the occasion and scope are appropriate, i.e. they are of low value and can be regarded as an expression of locally generally accepted business practice.

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## Avoidance of conflicts of interest

NOVOMATIC expects suppliers to make decisions related to business activities concerning NOVOMATIC based solely on objective criteria. Conflicts of interest with private interests or other economic or other activities, including those of relatives or other related persons or organizations, are to be avoided from the outset.

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## Fair competition

NOVOMATIC expects suppliers to behave fairly in competition and to comply with applicable antitrust laws. Suppliers shall ensure fair pricing for contracts and shall neither participate in anti-competitive agreements with competitors nor shall they abuse any dominant position that may exist.

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## **Money laundering**

NOVOMATIC expects suppliers to comply with the relevant legal obligations to prevent money laundering and not to engage in money laundering activities.

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## **Protection of confidential information & intellectual property rights**

NOVOMATIC expects suppliers to treat strictly confidential known trade secrets and personal data and process and appropriately protect personal data of NOVOMATIC employees only to the extent necessary and permissible in accordance with applicable data protection laws. Suppliers shall also ensure that the intellectual property of all participants is not made available to third parties without their consent.

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## **Responsible sourcing of raw materials / avoidance of conflict minerals**

NOVOMATIC expects suppliers to ensure that no products are delivered to NOVOMATIC that contain metals the source minerals or derivatives of which come from a conflict region where they directly or indirectly contribute to the financing or support of armed groups guilty of serious human rights violations. Conflict materials are all materials that directly or indirectly support non-governmental armed groups. Specifically, this concerns an import ban on materials (e.g. gold, tantalum, tin, tungsten ore) from conflict regions (e.g. Congo, Rwanda, Uganda, Burundi) and a conduct compliant with paragraph 1502 of the Dodd-Frank-Act. Information on the smelters and refineries for minerals used by the supplier must be made available upon request. The Conflict-Free Sourcing Initiative's Reporting Sheet (CMRT) is recommended for this purpose.

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## **REACH/RoHS conformity**

NOVOMATIC expects suppliers to comply with the REACH Regulation (Regulation (EC) No. 1907/2006) and the RoHS Directives (2011/65/EU and 2015/863/EU). In case of non-conformity, NOVOMATIC must be notified immediately.

## **Compliance with export restrictions**

NOVOMATIC expects suppliers to comply with the applicable laws and accept applicable trade restrictions, ensure compliance with these laws and, when exporting goods or services, comply with any existing regulations regarding export restrictions (this includes above all import/export restrictions by national authorities), embargoes and hold sanctions against countries and individuals. If the delivered goods are subject to restrictions and/or bans, listing in the applicable Dual-Use Regulation (EU) or the national export list, NOVOMATIC must be informed of this at the latest with the order confirmation.



# Social Responsibility

Suppliers are expected to recognize the basic and human rights of their employees in their companies and to treat their employees with dignity and respect. Suppliers are also expected to provide a safe and healthy working environment within their companies. NOVOMATIC's related requirements for its suppliers include the following aspects:

## Child labor

Child labor is strictly prohibited. NOVOMATIC expects suppliers not to employ children and behave in accordance with the recommendations of the **ILO conventions**:

- ILO Convention No. 138 (Minimum age for employment)  
The minimum age for employment or work is the higher of 15 years, the minimum age for employment applicable in the respective country or the age up to which school attendance is compulsory in that country. This Code of Conduct does not prohibit participation in acceptable on-the-job training programs which comply with Article 6 of ILO Convention No. 138 concerning the minimum age for admission to employment, or light work covered by Article 7 of ILO Convention No. 138 concerning the minimum age. Workers under the age of 18 must not carry out work that could endanger the health or safety of young workers.
- ILO Convention No. 182 (Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour)
- ILO Convention No. 77 (Medical examination of the suitability of children and young people for work in the trade)

## Equal opportunity and prohibition of discrimination

NOVOMATIC expects suppliers to promote equal opportunity and equal treatment and to eliminate discrimination when hiring employees, in remuneration, promoting them or providing training and development. No employee may be discriminated against on grounds of gender, age, skin color, culture, ethnic origin, sexual identity or orientation, disability, religion or belief.

## Humane treatment

NOVOMATIC expects suppliers not to subject their employees to any form of repression. They shall neither threaten nor subject their employees to brutal or degrading treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, verbal attacks or unreasonable restrictions on entering or leaving the premises provided by the company. Suppliers undertake to prevent repression and unlawful discrimination against their employees.

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## Working conditions

NOVOMATIC expects suppliers to provide their employees with adequate working facilities. Suppliers shall, as a minimum, ensure access to drinking water and sanitation facilities and shall ensure building security, access to emergency medical care, adequate lighting and ventilation.

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## Occupational health and safety

NOVOMATIC expects suppliers to ensure the existence of systems, processes and/or measures to comply with national statutory health and safety regulations. Suppliers must identify and evaluate potential safety risks and take appropriate measures to avoid them. Suppliers' employees must be instructed about potential safety risks, correct and safe behavior and appropriate safety measures to be implemented.

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## Free choice of employment

Employment is voluntary. Based on this principle, NOVOMATIC expects suppliers not to allow forced labor (according to ILO Convention No. 29 Forced Labor and No. 105 Abolition of Forced Labor), bonded or contract servitude, compulsory labor or involuntary prison labor in their companies. Moreover, suppliers have no right to withhold employee documents, such as, by way of example, their identity papers, immigration documents, work permits, etc., without valid legal grounds. Written contracts must be made available in a language that employees can understand.

### **Working hours, wages and other benefits**

NOVOMATIC expects suppliers to comply with the applicable regulations on working hours. Furthermore, NOVOMATIC expects suppliers to pay all employees the minimum wage required by applicable laws and regulations and to provide all legally required social benefits. In addition to remuneration for regular working hours, employees must also be compensated for overtime in accordance with applicable laws and regulations. Suppliers may not use wage deductions as disciplinary measures. They are obligated to grant vacation time, sick leave and public holidays in accordance with applicable laws and regulations. Suppliers must pay their employees on time and clearly and unambiguously present the basis for the payment of employees.

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### **Freedom of association**

NOVOMATIC expects suppliers to maintain open and constructive communication with employees and employee representatives. In accordance with local laws, suppliers must respect the right of employees to freely associate, join unions, appoint employee representatives and engage in collective bargaining. It is furthermore expected that suppliers will not disadvantage employees who act as employee representatives. In countries where these rights are restricted by law, suppliers take an open stance towards the development of equal means of free association and bargaining.

# Environmental Responsibility

Suppliers are expected to make a clear commitment to environmental protection and to act in an ecologically responsible and resource-efficient manner in their companies. Suppliers are furthermore expected to ensure quality in their business processes. NOVOMATIC'S related requirements for its suppliers include the following aspects:

## Quality and environmental protection regulations

NOVOMATIC expects suppliers to comply with all applicable environmental laws, regulations and standards and to implement an effective system for identifying and eliminating potential environmental hazards. All required permits, licenses and registrations should be in place and maintained. Suppliers shall meet their operational and reporting obligations. Suppliers shall endeavor to continuously improve their environmental management systems and their environmental performance.

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## Quality requirements

NOVOMATIC expects suppliers to meet legal and contractually agreed quality requirements in order to provide products and services which meet NOVOMATIC'S needs, achieve the warranted performance and are safe for their intended use.

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## Product safety

NOVOMATIC expects suppliers to provide product safety data sheets with all necessary safety-related information for all substances and dangerous goods used upon delivery of the respective product.

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## Environmental protection

NOVOMATIC expects suppliers to implement systems, processes and/or measures and to have obtained necessary approvals to ensure compliance with national and international legal environmental regulations. Suppliers must instruct their employees on how to avoid environmental risks and protect soil, water and air from pollutants.

**Resource and climate protection**

NOVOMATIC expects suppliers to use natural resources (e.g. water, energy sources, raw materials) sparingly as well as act in an environmentally friendly and climate-friendly manner. Any negative impact on the environment and the climate must be minimized or eliminated at the point of origin or through procedures such as modifications to the production process, the replacement of materials, conservation and recycling. Suppliers shall be committed to the use of climate-friendly products and processes to reduce electricity consumption and greenhouse gases.

**Imprint**

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