



**NOVOMATIC AG**

Code of Conduct

ENGLISH

# Code of Conduct

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## WHAT IS THE CODE OF CONDUCT?

Our Code of Conduct is based on our values and is binding for all employees, all business areas and all levels of responsibility at NOVOMATIC AG<sup>1</sup>. This Code of Conduct contains rules for ethically and legally sound conduct and decision-making by all individuals employed in the Group. It is based on the law and international standards.

## HOW DO WE USE THE CODE OF CONDUCT?

In our everyday business, situations may arise in which we cannot say with certainty which course of action is correct and appropriate. In difficult situations such as these, we should ask ourselves the following questions:

- » Is our conduct/decision permitted by law?
- » Does it correspond to our values, the basic principles contained in the Code of Conduct and our internal procedures and guidelines?
- » Is it free from personal interest and has the wellbeing of the Company been prioritised?
- » Do we „feel“ that our conduct/decision is right?
- » Will our conduct/decision withstand public scrutiny (e.g. by the authorities)?
- » Does our conduct/decision protect the reputation of our Company as a Corporate Group with high ethical standards?

If we can answer all these questions with “YES”, then it is very likely that our conduct or decision is correct and conforms to the following principles. In case of doubt, we contact our Compliance Manager.

## **HOW DOES THE CODE OF CONDUCT PROTECT US?**

The Code of Conduct provides guidelines and principles for everyday business conduct which conforms to our values and the law.

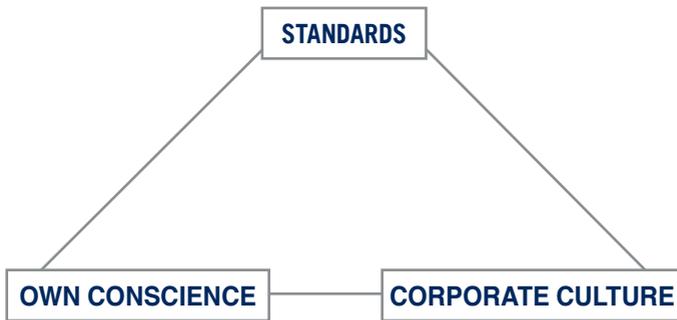
Observing these conduct guidelines preserves the good reputation of the Company, thereby protecting us as employees and reducing risks.

If we become aware of a violation against the law or the rules of the Code of Conduct, we report this to a neutral body using the NOVOTRUST Whistleblowing Reporting System. All information can be given mentioning your name or anonymously if required and will be handled in strict confidence.

Even if our suspicion should turn out to be unfounded, we need not fear any direct or indirect sanctions if we provided our information of the best of our knowledge and in good faith.

## WHAT ARE THE CONSEQUENCES OF NON-COMPLIANCE?

Non-compliance with the principles of the Code of Conduct may damage the reputation and competitiveness of our Company and may therefore result in disciplinary measures, civil and – in the worst case scenario – criminal sanctions.



The relationship between the standards, corporate culture and your own conscience is defined in the Code of Conduct.

### 1. CODE OF CONDUCT

The Code of Conduct is valid across all companies in which NOVOMATIC AG has a direct or indirect holding of at least 50%. Other companies in which we are shareholders or companies with which we maintain a longterm business relationship are made aware of the Code of Conduct and invited to enforce it by independently acknowledging it within their company decision-making structures.



# Foreword by the **EXECUTIVE BOARD**



NOVOMATIC AG has achieved an excellent reputation across the globe since it was founded in 1980. Innovation, products and services of the highest quality, reliability and an international orientation have made NOVOMATIC AG one of the leading Gaming Technology Groups in the world.

The high degree of responsibility towards society – and the notion of minor and player protection in particular – have been firmly established at NOVOMATIC AG from the outset. The Company will continue to stand for this in the future.

The present Code of Conduct defines an ethical and legal framework within which we intend to act and continue along our road to success.

It is binding for all employees in all companies and business areas as well as for all hierarchical levels at NOVOMATIC AG and it is based on international standards, such as the UN Global Compact's ten principles.

Our objective here is to make a clear statement against corruption in whichever form it may appear. We are committed to an inclusive, respectful, legally compliant and non-discriminatory corporate culture. For this reason, the Code of Conduct, which constitutes a basis of this corporate culture, must be practiced and lived each and every day.



**RYSZARD PRESCH & JOHANNES GRATZL**

Executive Board of NOVOMATIC AG

A

Fundamental

# CONDUCT REQUIREMENTS

- 
- I APPROPRIATE CONDUCT OF INDIVIDUALS
  - II MANAGEMENT AND SUPERVISORY BOARD'S LEADERSHIP AND RESPONSIBILITY
  - III COMPANY PRACTICE TOWARDS EMPLOYEES
  - IV RESPONSIBILITY FOR THE COMPANY



# FUNDAMENTAL CONDUCT REQUIREMENTS

## CORRECT CONDUCT OF INDIVIDUALS

A1

**No violations against the law and internal guidelines.  
We are committed to legally compliant practice.**

In order to maintain our role as a leading gaming provider, it is essential that we conduct our business in an exemplary manner and that everyone of us contributes to this. Even if much of what is in this Code of Conduct seems to go without saying, the purpose of the Code of Conduct is to emphasise that compliance with the applicable legal requirements of the countries in which we operate constitutes a fundamental principle in our Company. We must avoid violations against the legal regulations which are applicable to our business activities, as well as violations against internal guidelines, regardless of the hierarchical level we belong to.

We shall treat everyone with the same respect and appreciation and respect the privacy and personal rights of individuals. This also includes the confidential treatment of personal information relating to our colleagues which we become aware of during the course of our work.

Regardless of our role and position, we shall work together in an open and direct manner. This means: we greet colleagues and guests, whether in person or on the phone, answer calls stating the name of the Company, ensure a respectful, friendly tone, dress appropriately and are always cooperative. These values are also reflected in written communication by using respectful and careful phrasing.

## MANAGEMENT AND SUPERVISORY BOARD'S LEADERSHIP AND RESPONSIBILITY

### **For management only: Leadership through performance and exemplary conduct.**

### **We are committed to a leadership style based on the recognition of achievement, motivation and ethical conduct.**

Part of our image as a modern, leading company in the gaming sector is a contemporary, responsible management culture. The management should achieve acceptance through performance and exemplary conduct. Thus, managers with the authority to recruit or promote personnel should make decisions based on the candidates' professional qualifications and exemplary conduct.

It is the duty of all of us as managers to set clearly formulated, ambitious but realistic targets and to strive for these ourselves through our own actions. Compliance with legal regulations should already be obvious as an indispensable requirement in the instructions on the achievement of objectives. During implementation, it is our responsibility as managers to monitor whether legal provisions are adhered to. As managers, we must make it clear at all times that violations of the law are not accepted.

We can only succeed in driving our Company forward with the help of motivated employees. It is our view that delegating as much responsibility as possible not only increases motivation but also the sense of belonging to the Company and, for this reason, it should be promoted.

We must not forget: integrity starts at the top of the Company. As managers, we should encourage ethical behaviour and set an example with our practice.

### A3

## COMPANY PRACTICE TOWARDS EMPLOYEES

### **No discrimination.**

**We assume responsibility for safety at the workplace and we do not tolerate any discrimination.**

Our Company assumes responsibility for our employees and offers everyone the same terms, regardless of gender, ethnic origin, age, disabilities, faith, world views and sexual orientation. The health and safety of our employees is of particular concern to our Company. Employees are entitled to a safe place of work. Legal employee protection measures are integrated in daily practice and, where necessary, improved. Our Company is serious about promoting physical and mental wellbeing and contributes its commitment to retain jobs.

### **GROUP CORPORATE RESPONSIBILITY & SUSTAINABILITY**

[cr@novomatic.com](mailto:cr@novomatic.com)

### **GROUP HUMAN RESOURCES**

[equalopportunities@novomatic.com](mailto:equalopportunities@novomatic.com)

## **A4** RESPONSIBILITY FOR THE COMPANY

**No expressing of company-related opinions without clearance.  
We always coordinate companyrelated opinions with the  
Group Marketing & Communications Department.**

Personal loyalty towards the Company is expected from us as employees.

We contribute to the reputation of our Company through our behaviour. All of us should be aware that this forms part of the company's goodwill, which constitutes an asset in the balance sheet and should not be underestimated. Anyone recognisable as an employee of our Company on social networks or other online platforms but also offline is thus perceived as representatives of our Corporate Group and should therefore uphold the conduct that is expected professionally.

Employees must especially refrain from discriminatory and offensive statements, e.g. against competitors. Uniform and clear communication is essential, especially in the highly sensitive gaming market, in order to maintain the trust of customers and the public to establish a uniform and consistent corporate image. Before consenting to or carrying out any planned communication and marketing measures, these must be cleared with the responsible communications and marketing department.

We shall not make any statements in public on behalf of the Company and always refer to the Group Marketing & Communications Department.

### **GROUP MARKETING & COMMUNICATIONS DEPARTMENT**

communications@novomatic.com

B

# RESPONSIBILITY

towards Customers



## RESPONSIBILITY TOWARDS CUSTOMERS

**No gaming without secure framework conditions.**

**We are committed to modern player protection which increases the customer's personal accountability.**

We want to offer our customers entertainment at the highest technical level and within the best possible framework. Besides our diligent quality assurance, internationally accredited and independent test laboratories guarantee the compliance to the respective legislation.

Gaming and betting bear a risk for a small group of our customers of slipping into gaming behaviour that is no longer controllable. We take this responsibility seriously and give top priority to the protection of minors and players. Strengthening our customers' own accountability by providing information, raising awareness and helping the affected persons to help themselves are the aims of our Responsible Gaming commitment, which goes considerably beyond legal requirements.

We have summarised the basic principles of our Responsible Gaming policy in the Responsible Gaming Codex, which can be read at [www.novomatic.com/responsible-gaming](http://www.novomatic.com/responsible-gaming). These include prevention by providing information and raising awareness – as well as customer care by trained staff and collaboration with experts and qualified advisory centres and treatment institutes.

As employees, we are called upon to keep up to date with information on pathological gaming and appropriate preventative measures.

Our Company's range of gambling games is aimed exclusively at adults.



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ADMIRAL  
GAMES FOR THE WORLD

# DEALING WITH

## Business Partners and Third Parties

- 
- I SELECTION OF BUSINESS PARTNERS
  - II ANTI-CORRUPTION POLICY: OFFERING AND GRANTING BENEFITS
  - III ANTI-CORRUPTION POLICY: REQUESTING AND ACCEPTING BENEFITS
  - IV SPONSORING AND DONATIONS



# DEALING WITH BUSINESS PARTNERS AND THIRD PARTIES

## SELECTION OF BUSINESS PARTNERS

C1

**No business without ethical principles.**

**We are reliable in our business relationships and expect the same from our business partners.**

As a manufacturer of high-tech products, we not only place the highest demands on the quality of our products but also on overall professional business conduct. We respect the wishes of our business partners and operate with the service mentality that we expect from our suppliers. We want to be a reliable business partner and make our selection decisions based on transparent criteria.

We apply our purchasing conditions, wherever possible. We require our business partners to commit to the following principles:

- » Legally-compliant behaviour
- » The rejection of corruption
- » A ban on child labour
- » Health protection for employees
- » Measured use of natural resources

At the same time, we select our suppliers with great care to ensure that our Company's reputation is not tarnished through any improper supplier activities or business practices.

## ANTI-CORRUPTION POLICY: OFFERING AND GRANTING BENEFITS

### **No corruption.**

#### **We are committed to honesty in our business and social activities.**

We want to receive orders in a fair manner on the basis of the quality and uniqueness of our products and services, as well as through competitive prices. Our Company would rather forego an order than receive it through bribery/or by granting undue advantages. It is irrelevant here whether the bribery or the granting of undue benefits is intended to prompt action or omission by the other party.

We are decidedly against offering and granting cash, gifts and other benefits (e.g. offering a job) in order to obtain an undue advantage, regardless of whether this happens directly in favour of the decision-maker or in favour of a third party.

Especially when dealing with government officials, arbitrators and experts, we must avoid all activities which make any impression of exerting illegal influence. Government officials are e.g. bodies and contractors with legislative, administrative or judiciary duties or even employees of companies in which one or more regional authorities have a share of at least 50%.

Our Company is committed to this particularly strict procedure against corruption, not least because only a uniform line which is applied groupwide can meet the requirements of the different legal systems in which we operate.

In B2B transactions, we pay attention to the following:

- » Payments should only be made to the relevant service provider or assignee/ payments should only be made by the relevant service beneficiary.
- » Payments should not be made in cash.
- » Our business partners shall adopt business standards equivalent to our own and disapprove corruption as we do.
- » These business partners' performance and reputation are undisputed.
- » The established business relationships and transactions are transparent because of records thereof.

In particular, agreements which are outside the scope of our usual business operations are checked on a regular basis by the Group Audit Department.

**C3****ANTI-CORRUPTION POLICY:  
REQUESTING AND ACCEPTING BENEFITS****No dependencies.****We are committed to objectivity and impartiality.**

Employees and business partners who operate in the name of our Company must not use their position to request, accept or agree to receive benefits for themselves or for a third party.

Accepting a benefit is only permitted when taking presents of small value. The impression of expecting a specific behaviour or even a reward must not arise when accepting benefits. This is to consider especially if we have to make business-related decisions in the near future. If such an impression will arise depends on the circumstances of the specific case, particularly of following factors:

- » Value of benefit
- » Frequency of granting benefits
- » Position of the beneficiary within the Company

Accepting benefits outside of this scope is prohibited and in any such case must be reported to the Compliance Manager for authorisation. By no means is it allowed to accept cash money or non-cash benefits (e.g. vouchers) offered by business partners or third parties.

**C4****SPONSORING AND DONATIONS**

**No sponsoring or donations without transparency.**

**We are committed to transparency and social responsibility when it comes to sponsoring and donations.**

Our Company is an important employer. We are aware of our responsibility toward society and are committed to share our success with society. For example, we support social and cultural initiatives in order to contribute to societal solidarity.

Wherever possible and appropriate, we try to link the promotion of art, culture or sport to a social concern. Supporting established welfare institutions, preferably holders of a charity seal of approval, has priority over donations to affected individuals.

In all sponsoring activities we ensure that the protection of minors and players is safeguarded. All sponsoring measures and donations must be transparent. For us, that means that the identity of the recipient and the planned use must be known and documented.

For more information on the sponsoring and donation principles, criteria and required information for an inquiry, please visit [www.novomatic.com/cr](http://www.novomatic.com/cr). The Group Marketing & Communications Department provides further information.

**GROUP MARKETING & COMMUNICATIONS**

[communications@novomatic.com](mailto:communications@novomatic.com)



NOVOMATIC FORUM

Luigi's  
CAFE BAR

C

# THE WAY OF

# Doing Business

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I DEALING WITH COMPETITORS

II DEALING WITH GOVERNMENT AUTHORITIES AND LOBBYING



# THE WAY OF DOING BUSINESS

D1

## DEALING WITH COMPETITORS

**No anticompetitive practice.**

**We are committed to fairness in competition.**

We are committed to fair competition because this is the only way all market participants can realise their full potential. We are therefore subject to the principle of integrity in the competition for market shares. We are all obliged to observe the rules of fair competition and to adhere to them. In particular, we may not make any agreements with competitors or their subcontractors (e.g. independent sales organisations), to fix the following for the purpose of distorting competition:

- » Purchase or sales prices/resale prices/terms of business
- » Division of the markets and supply sources
- » Restriction/control of production, sales, technical development or investment
- » Discriminatory use of differing conditions for services of equal value towards trade partners
- » Tie-in transactions

We produce our products on the basis of our own innovation or our own expertise bought-in for this purpose. We respect external property laws (such as patents and trademark rights) and expect this in return from our competitors.

## DEALING WITH GOVERNMENT AUTHORITIES AND LOBBYING

**No dishonest conduct towards government authorities.  
We are committed to conscientious and transparent dealings  
with government authorities.**

We have contact with government authorities in many different ways; for example, during the course of the issue of licenses and concessions. It is also possible for public institutions to be customers of our Company. Precisely because our Company is in the focus of public interest, it must be emphasised that this demands legally-compliant conduct from us as employees and increased transparency – particularly when dealing with government authorities.

We stress our willingness to offer our expertise for the further development of regulatory framework conditions and we participate in public consensus-building discourses in a transparent manner by making information and our industry expertise available. If we consider it necessary to participate directly in a legislative or administrative decision-making process, we sometimes do so through lobbying activities. In some countries, such as Austria, this approach is subject to specific regulations.

We naturally comply with such legal regulations and conduct all our lobbying in a transparent manner and within the boundaries of the law.

E

# COMPANY ASSETS

## Nondisclosure and Property Rights

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I STEWARDSHIP WITH COMPANY ASSETS

II NONDISCLOSURE AND PROPERTY RIGHTS



## COMPANY ASSETS, NONDISCLOSURE AND PROPERTY RIGHTS

E1

### STEWARDSHIP WITH COMPANY ASSETS

**No waste of company assets.**

**We are committed to handling company assets with care.**

Company assets, whether tangible or intangible, are intended to support us in achieving business objectives. Damaged, stolen, inappropriately used or wasted company assets are to the detriment of all of us and compromise our Company's business and financial performance. Company assets may only be used for legal business purposes. When procuring office equipment, the costs must be proportionate to the benefit.

Company resources, e.g. a photocopier or phone, may occasionally be used for personal purpose, provided that no significant costs result and that other employees do not feel disturbed.

**E2****NONDISCLOSURE AND PROPERTY RIGHTS**

**No breaching of property rights and no passing on of information.**

**We are committed to respecting property rights and treating industrial and company secrets as confidential.**

We attach great importance to the confidential treatment of secret information. This includes industrial secrets (e.g. construction drawings, samples, models, formulas, software) and company secrets (e.g. figures from the internal reporting system). Secrets are all facts, circumstances and operations which are not publicly available – but only accessible to a selected circle of people and in which the Company has an interest in them not being disseminated. This type of information is confidential, regardless of whether it is marked as confidential or not.

Confidential information from or regarding suppliers, customers, consultants, agents etc. must also be treated as confidential.

We are subject to the principle of nondisclosure as a result of an agreement in the employment contract and our legal duty of allegiance towards our Company as our employer.

The duty of nondisclosure applies beyond the end of our employment as the disclosure of confidential information, regardless of when it happens, may damage the business of our Company, our suppliers or customers. No one should leave confidential documents lying around at the workplace where unauthorised parties may read them. We refrain from passing on information verbally in the presence of those who do not need to know about it. Caution is required while working on a notebook or a smartphone in public areas.

In this context, it should be pointed out that taking recordings, regardless of which type, is not permitted on the business premises except for our own business purpose. This applies to visitors to our production premises in particular. The privacy of trade secrets predominantly serves to protect intellectual property rights and to prevent the loss of our expertise.

If counterfeits of our products (product piracy) or other violations of our intellectual property rights are discovered, this should be reported to the Group Legal Department:

#### **GROUP LEGAL**

[ipenforcement@novomatic.com](mailto:ipenforcement@novomatic.com)

Conversely, in the event that third party property laws are applied, we are obliged to adhere to the terms of the underlying contract.



F

# DEALING

with Conflicts  
of Interest



NOVOMATIC

## DEALING WITH CONFLICTS OF INTEREST

### **No Conflicts of Interest.**

**We are committed to integrity and transparency.**

In our Company it is considered important that no one becomes involved in a conflict of interest or loyalty when carrying out his or her contractual duties. This may occur if private circumstances conflict with the interest of our Company or if an employee holds several functions of conflicting interests within the Group. If we are affected by this, we have to disclose such conflicts of interest to the superior and Compliance Manager or avoid them from the outset.

Internal decisions must not be influenced by personal or private interests. An actual or potential conflict of interest exists in any case if relatives fill the position of a superior and/or are employed in the same or the superior department.

Close relatives will be employed only if the decision of their employment is based on objective criteria like qualification, performance, skills as well as experience and there is no direct reporting line between superior and relative. Any such case must be reported to the Compliance Manager. This rule does not apply for short-term employments such as internships or practical trainings.

In any case, we have to disclose negotiations with business partners to whom an economic or personal relationship exists as they are considered as a conflict of interest per se which has to be disclosed and, as possible, to be avoided. If an employee, who is participating in the decision-making process, is somehow involved in the business of the counterpart it is not allowed to assign this company without prior disclosure to the Compliance Manager. This also applies in the case of the involvement of close relatives (spouse, common law partner, children, in-laws, siblings, parents).

Participating in gaming/betting on our Group's products or via our Group's services inside and outside of NOVOMATIC premises is forbidden. There is an exception to the betting/gaming ban if the betting/gaming is for business purpose such as customer demonstrations, tests and market research.

G

Accurate

# REPORTING AND DATA PRIVACY

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I ACCURATE REPORTING

II DATA PRIVACY



## ACCURATE REPORTING AND DATA PRIVACY

G1

### ACCURATE REPORTING

**No passing on of incomplete information.**

**We are committed to accurate and complete reporting.**

A good information basis has to exist to be able to make the right decision. Therefore, accurate and complete reporting is necessary.

As part of our professional activity we ensure that all books and records which we are responsible for are complete and accurate, honestly reflect every incoming/outgoing payment and that the records are completed on time in accordance with the applicable regulations and standards, regardless of whether the information is to be published and whether it is intended to be presented to authorities or not.

Representation can be misleading based on the layout alone or missing explanations.

**No disclosure of personal information.****We are committed to treating personal data with care.**

Data privacy and the security of information are the basis for stable and successful customer relations for our Company. In Austria, for example, automatically processed personal data in which the affected party (in other words: natural persons, in Austria partnerships or legal entities as well) has an overriding interest in secrecy, is subject to data privacy. This data may not be used illegally.

Our Company uses this personal data from us employees, customers or business partners, solely within the framework of existing contractual relations and in compliance with legal regulations and in particular, with the applicable, national data privacy provisions. Our Company only makes data available to processors (service providers) who offer sufficient guarantee concerning the lawful and secure use of data on the basis of a service contract concluded in writing. The trust of our customers is particularly important to us. The Group Data Privacy Officer should be contacted if any questions concerning the processing of data arise.

**GROUP DATA PRIVACY OFFICER****GROUP LEGAL COMPLIANCE**

dataprotection@novomatic.com

We offer easily accessible information on our data privacy policy to anyone interested via the internet at <https://www.novomatic.com/en/privacy-statement>.

H

# MONEY LAUNDERING

No money laundering

## **MONEY LAUNDERING**

### **No Opportunity for Money Laundering Activities.**

**We are committed to preventing money laundering.**

The term money laundering refers to bringing illegally obtained money and assets into the legal financial and economic cycle. This money is either the result of illegal activities (e.g. drug trafficking, arms trade, in some countries also tax evasion) or is intended to finance illegal activities such as terrorism. Any commercial transaction can be the target of a money laundering scheme.

A declared aim of our Company is to prevent money laundering. For this reason, our Company has developed a money laundering prevention scheme which we continually improve. Furthermore, we collaborate actively with the responsible authorities. Staff training is a significant cornerstone of our money laundering prevention scheme.

In the event of further questions or to report suspicious cases, please contact the Group Money Laundering Officer.

### **GROUP MONEY LAUNDERING OFFICER**

### **GROUP LEGAL COMPLIANCE**

[antimoneylaundering@novomatic.com](mailto:antimoneylaundering@novomatic.com)



# **ENVIRONMENTAL PROTECTION**

No Waste of Resources

## **ENVIRONMENTAL PROTECTION**

**No waste of natural resources.**

**We are committed to environmentally friendly conduct.**

As a production company with a high vertical range of manufacture and as an important service provider, we take our responsibility for the environment seriously. In production, we resort, as far as possible, to energy-saving and environmentally friendly alternatives. It is our aim to produce products and services in the most environmentally friendly and energy-efficient manner as possible and to raise awareness among staff.

### **GROUP CORPORATE RESPONSIBILITY & SUSTAINABILITY**

[cr@novomatic.com](mailto:cr@novomatic.com)

J

# CONTACT

## Support

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I NOVOTRUST – GROUP-WIDE WHISTLEBLOWING REPORTING SYSTEM

II COMPLIANCE MANAGER

## **J1** NOVOTRUST – GROUP-WIDE WHISTLEBLOWING REPORTING SYSTEM

With NOVOTRUST, we have set up a group-wide electronic Whistleblowing Reporting System that meets the new legal requirements and ensures confidentiality of the information. This whistleblowing system is not only aimed at us employees but also at our business partners. At <https://novomatic.com/novotrust>, you can confidentially and, if desired, anonymously report violations of the law or a breach of our Code of Conduct in accordance with the legal requirements. Even if you prefer to appear by name, there is no need to fear any disadvantages, provided there was a justified reason to assume a violation.

Further information and details on the reporting process are available at <https://novomatic.com/novotrust>.

## **J2** COMPLIANCE MANAGER

**THOMAS VEVERKA LL.M., MBA**

Tel.: +43 2252 606 351

K

# OUTLOOK AND SANCTIONS

for Infringements

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I OUTLOOK

II SANCTIONS FOR INFRINGEMENTS

## **K1** OUTLOOK

Examples of the topics covered in the Code of Conduct will be provided in the eLearning compliance trainings and the in-house-trainings. The review of the Code of Conduct will take place on a regular basis in order to incorporate changes in laws and suggestions for improvement. As employees, we are encouraged to send our suggestions to the Compliance Manager.

## **K2** SANCTIONS

Not following the basic principles of the Code of Conduct may damage the reputation and competitiveness of our Company. For individuals this may lead to disciplinary action as well as civil and criminal sanctions. The Compliance Manager voices recommendations to the management on which measures should be taken to avoid infringements of the law or the provisions stated in the Code of Conduct in the future.

# GLOSSARY

## Code of Conduct

### **COMPLIANCE**

Behaving in accordance with the valid and applicable law, other legal regulations, industry practice and internal rules.

### **CORPORATE RESPONSIBILITY (CR)**

CR stands for responsible corporate practice in the actual business activity, from ecological relevant aspects (environment) to aspects regarding the treatment of employees and exchange with relevant lobbies and stakeholders. It is voluntary contribution of the economy to sustainable development.

### **GAMBLING**

Gambling is when the decision on the outcome of a game is completely or predominantly based on chance. In terms of this Code of Conduct it may also refer to the business sector of betting.

### **TIE-IN TRANSACTIONS**

A condition, attached to the conclusion of a contract, stipulating that the contractual partners are to accept additional services which neither have a factual nor trade practice-based relation to the object of the agreement.

## **CORRUPTION**

The misuse of entrusted power for use or benefit of a private person or of a corporation like the bribery of office holders.

## **RESPONSIBLE GAMING MANAGEMENT**

Measures to inform customers of the risks of gaming addiction and to help gaming addicts.

## **NOVOTRUST WHISTLEBLOWING REPORTING SYSTEM**

Whistleblowing refers to drawing attention to grievances, illegal practices or general risks.



# NOTES





## **OWNER, EDITOR AND PUBLISHER**

NOVOMATIC AG

Wiener Strasse 158, 2352 Gumpoldskirchen

Company registration number: FN69548b

## **EDITORS**

Group Legal Compliance

## **DESIGN**

NOVOMATIC AG

## **VERSION**

11/2021

