



## **CODE OF CONDUCT**

### **LEADING WITH INTEGRITY**

**As of September 2010**

## INTRODUCTION TO THE CODE OF CONDUCT

We are a global company operating in a complex and highly regulated business environment. Our employees live and work in countries all over the world. This Code of Conduct (this "Code"), which has been approved by the Lottomatica Group Board of Directors, provides information about the standards of behavior and the level of integrity expected of all employees, directors, officers and consultants, as well as any third parties, agents or representatives who deal with or act on behalf of the Lottomatica Group S.p.A. and its subsidiaries and controlled affiliates (the "Company" or "Lottomatica").

This Code is not a contract of employment and does not create any contractual rights of any kind between the Company and its employees. However, complying with this Code is an obligation of every employee. Employees who do not comply with this Code or other Company policies may be subject to disciplinary measures to the extent permitted by applicable law and labor contracts. Third parties, agents and representatives that, as required, do not comply with this Code may be subject to appropriate sanctions in accordance with applicable laws or contractual provisions.

This Code is intended to be applied globally to all of our business activities and corporate operations in accordance with the cultural, social and economic differences in the various countries where the Company operates. Where local laws and regulations contain mandatory requirements that differ from the provisions of this Code, such requirements will prevail.

## CORE PRINCIPLES

The Company is committed to the principles of Integrity, Trust, Respect and Excellence in all relationships in which it does business.

- We comply with all applicable laws and regulations governing the business worldwide and expect all of our contractors, consultants and other third parties with whom we do business to do the same.
- We manage our activities in compliance with our core principles in all business operations and transactions.
- We act with integrity in all relationships and in all workplaces, avoiding all conflicts of interest between work and personal activities of our employees.
- We are committed to the protection of our Company's total assets, including our financial, physical and intellectual property assets, and guarantee the accuracy and transparency of all given information.
- We maintain a culture that fosters a safe workplace, equal opportunity, diversity, communication and innovation where everyone is treated with respect, fairness and dignity.
- We are committed to corporate social responsibility and, in particular, enabling our customers to provide educational, cultural, charitable and philanthropic opportunities to their citizens.

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## INTEGRITY

### *Standard of Conduct*

The Company conducts all its activities in an ethical manner, with integrity, trust, respect, and fair dealing. These values should govern our conduct in every decision we make which affects the Company. Regardless of the pressures involved in conducting business, it is our duty to act responsibly and with integrity. This means that we must avoid even the appearance of impropriety in carrying out Company business.

### *Commitment to Integrity*

Compliance is everyone's responsibility. We must comply with all applicable laws and regulations. Unless otherwise prohibited by local law, as a condition of employment, we require all employees to acknowledge their commitment to comply with this Code and all Company policies.

A violation of the applicable laws and regulations can cause harm to the Company in terms of its business reputation and the potential loss of confidence by our customers, shareholders and employees. Therefore, if at any time you have a question about proper business conduct or you are uncertain about a specific situation or circumstance or need interpretation of any provisions of this Code, you should ask for assistance from your supervisor or a representative of the Compliance, Legal or Human Resources Departments.

In light of the above, we must take the time to learn and understand this Code, the Company's policies and the laws and regulations applicable to our job responsibilities. We may also be required to attend training sessions to ensure we understand such policies, laws and regulations.

### *Fair Employment, Diversity and Harassment*

The Company is committed to providing a work environment where everyone is treated with fairness, dignity and respect. The Company will not discriminate against anyone on the basis of race, color, creed, religion, national origin, age, disability, sex, sexual preference, sexual identity, marital status, military status, veteran status, or any other legally protected status in accordance with applicable law and regulations.

Any kind of harassment by or against Company employees is prohibited. Prohibited conduct includes the making of degrading or humiliating jokes, slurs, intimidation, unwelcome sexual advances, or requests for sexual favors in conjunction with employment decisions. Engaging in any verbal or physical conduct with sexual overtones that interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment is unacceptable.

The Company is also committed to providing a safe and healthy work environment and requires that each person report to work free from the influence of any substance that could prevent him/her from conducting his/her work activities safely and effectively.

### ***Conflict of Interest***

We must avoid behaviors, relationships and situations that conflict or appear to conflict with our job responsibilities or the interests of the Company. A conflict of interest is considered to be any situation or arrangement where your personal activities or interests conflict with your responsibilities to the Company. Any outside activities or relationships that may involve a conflict of interest or even the appearance of a conflict of interest must first be approved by your manager and then disclosed to the Chief Compliance Officer or his designee.

The following are examples of conflicts of interest:

- Engaging in any employment, business, professional or other activity outside of the Company that interferes or conflicts with your job responsibilities.
- Holding a substantial direct or indirect financial interest in a current or prospective customer, supplier or competitor of the Company, or serving as an employee, consultant, officer, or director of that business.
- Directing Company business to a supplier owned or managed by you, a relative or close associate.
- Using confidential Company information, taking advantage of Company business opportunities or improperly using Company assets for the benefit of yourself, a relative or close associate.

Participation in non-business activities such as charity work or the carrying out of political roles can create a conflict of interest if your personal involvement creates obligations for the Company without Company approval or if your activity makes it appear that the Company has undue influence on decisions.

This is not a complete list of possible conflicts of interest but a sample of the kinds of relationships and activities that can create a conflict of interest.

If you have questions whether any activity creates a conflict of interest, you should contact the Chief Compliance Officer or his designee for approval prior to commencing such activity.

### ***Raising Concerns and Prohibition Against Retaliation***

Each of us has a responsibility and an obligation to promptly report suspected or known violations of the Code, including any violations of law or regulations. Ethical and compliance concerns should be communicated through regular reporting channels.

Raising concerns or reporting misconduct, especially if it involves a friend or supervisor, may feel like a breach of personal ethical standards. However, being silent and not reporting the concern could bring serious harm to the Company, loss of confidence by customers, fines or other kinds of penalties.

For a complete listing of ways to report suspected or known violations of the Code, law or regulations, please refer to the *Avenues of Communication* section at the end of this Code. The Company will not retaliate or discriminate against anyone for reporting in good faith a suspected or known violation.

## **BUSINESS PRACTICES**

### ***Participation in Lotteries***

All employees (other than Lottomatica's Italy-based employees), representatives and consultants shall not participate in or claim or receive any benefit, directly or indirectly, from any lottery game in any jurisdiction where the Company provides lottery services or products. Employees and consultants should advise immediate family members (parents, spouse, siblings, and children) and members of their household that they may be similarly restricted by state or local laws, regulations or the Company's contracts in various jurisdictions.

In limited instances, employees and consultants may play customer lottery games provided that such play is related to their job, is permitted under applicable laws and contracts and the person obtains prior approval from their manager and the Chief Compliance Officer or his designee. Any winnings resulting from such play must be returned to the customer.

### ***Participation in Gaming***

No employee shall make any wager or otherwise participate in gambling activities in any gaming facilities which are prohibited by applicable contracts, regulations or licenses. The list of such facilities can be found on the Compliance Department websites for Spielo, Atronic and GTECH.

All Italy-based employees and consultants are prohibited from participating in gaming activities in Italy. However, in limited instances, employees and consultants may play gaming devices provided that such play is related to their job, is permitted under applicable laws and contracts and the individual obtains prior approval from their manager and the Chief Compliance Officer or his designee.

### ***Intellectual Property***

The Company's intellectual property, including its copyrights, patents, trademarks and trade secrets are extremely valuable to the Company and its continued success.

Intellectual property is one of the most important assets generated by the Company. These assets include extremely valuable proprietary information, such as computer software and source code, engineering designs and drawings, research and development, confidential processes and know-how, marketing plans, etc. The loss, theft, unauthorized disclosure or misuse of the Company's intellectual property jeopardizes its business and causes it harm.

Each of us is responsible for preserving the Company's intellectual property by complying with policies and procedures for its protection. This obligation continues even after a person leaves the employ of the Company.

The Company also respects the intellectual property of others. It is against the Company's policy to reproduce copyrighted software, documentation, or other materials without the owner's permission. The Company respects the limitations specified in the licensing agreements of its software suppliers and does

not use or copy software or documentation except to the extent that the applicable license agreement allows for such use or copying.

All employees agree to assign to the Company all rights he/she may have or may acquire in any idea, invention information, concept or thing which is both (i) based upon or related to any Company confidential information, service(s) or product(s) and (ii) is generated during the term of their employment or within one year after termination, except in those instances where local laws and regulations contain mandatory requirements that differ from the provisions of this section.

### ***Electronic Media and Communications Systems***

All electronic media and communication systems, including email, intranet, Internet access and voice mail are Company assets and are to be used for appropriate business purposes.

The Company has policies regarding the use of electronic media and communication systems, which show the importance of the correct use of such tools in order to prevent harm to the Company, in terms of loss of reputation, reduction of productivity and imposition of money penalties.

The ability of the Company to access and control any personal communication or data created or stored on electronic media and communication systems provided by the Company is allowed, unless otherwise prohibited by applicable law and, in any case, in accordance with a reasonable protection of confidentiality of the relationship between the Company and its employees.

### ***Accuracy, Retention and Disposal of Documents and Records***

The Company's books and records shall be complete, fair and accurate and shall comply with all legal reporting requirements. No entries will be made that intentionally conceal or disguise the true nature of any transaction. The Company will not create or permit the creation of false or misleading statements in financial reports or other documents submitted to or maintained for government agencies, customers or shareholders.

The Company maintains rigorous business processes and a system of internal controls to protect its physical, financial and intellectual property assets and to ensure that management decisions are based on sound financial and economic analysis, including consideration of the risks.

All records will be retained and destroyed strictly in accordance with the Company's policies and applicable statutory and legal requirements. We are not allowed to remove or destroy records or documents prior to the specified date in the policy or remove or destroy them at all if the destruction policy is suspended due to threatened or pending litigation or investigation.

### ***Press Releases and Media***

Employees should not make statements to the media about the Company's business, its prospects or results. All communications concerning the Company with any representative of the media or financial community, including reporters, journalists, authors, commentators, investors, traders and analysts, must be authorized by the Company's Corporate Affairs Department. All press releases are issued by the Lottomatica Corporate Affairs Department in consultation with the Lottomatica Legal Department and Investor Relations Department. Exceptions to this rule are those ordinary – course press releases that are

issued by the Company or any subsidiary of the Company that is a lottery operator and is required to provide such information pursuant to its legal obligations as an operator or under a license or concession.

### *Privacy*

The Company is committed to individual privacy and recognizes the responsibility it has to protect the privacy rights of all persons whose personal information is within the Company's custody and management. The Company will not intentionally gather or maintain sensitive personal information that is not relevant to conducting its business. Each of us must take care to protect individually identifiable and sensitive personal information from inappropriate or unauthorized use or disclosure. All Company operations must implement fair and responsible privacy and information protection procedures and take responsible steps to ensure compliance with such procedures and applicable law.

## **BUSINESS RELATIONSHIPS**

### *Cooperation with Regulators*

The Company is committed to cooperating with the various regulators that oversee its business activities. Each of us who act on behalf of the Company will assist the Company in meeting its business obligations to these regulators and will provide maximum availability and responsiveness.

### *Business Courtesies*

Gifts and entertainment are courtesies designed to strengthen and foster business relationships. Nevertheless, we must avoid the appearance of impropriety when giving gifts to or entertaining individuals who do business or are seeking to do business with the Company. Requesting or soliciting personal gifts, favors, entertainment, or services is always unacceptable. Any expenditure made for gifts, entertainment or anything of value must be reported promptly and recorded accurately in the Company's books and records.

- ***Business Entertainment***

Appropriate business entertainment (e.g., reception, meal, sporting or theatrical event) of business partners, current or prospective, is generally acceptable provided it is clearly intended to facilitate business goals. The expenses involved must be moderate, reasonable and in good taste and not otherwise prohibited by law or Company policy. During these events, topics of a business nature must be discussed and Company employees must be present.

Sometimes business partners extend training and educational opportunities that include travel and overnight accommodations at no cost to you or the Company. Similarly, there are some circumstances where you are invited to an event at a vendor's expense to receive information about new products or services. Accepting these types of invitations at the vendor's expense is generally discouraged. However, occasionally your presence at such an event is important to building a business relationship and may benefit the Company. In those instances, prior to accepting, you must obtain approval from your manager and the Chief Compliance Officer or his designee. If your attendance at the event is approved, the Company should pay for travel and accommodations.

- *Gifts*

It is the Company's policy to discourage the receipt or giving of gifts, directly or indirectly, by employees to individuals who do business or are seeking to do business with the Company. However, where not otherwise prohibited by law or Company policy, we may give or receive gifts of a promotional nature on condition that: (1) the gift is reasonably connected to a business purpose, (2) the gift has a maximum value of €100, unless the gift has been specifically approved by the Chief Compliance Officer or his designee and it shall not have the intent to influence a business choice of whoever receives the gift, and (3) the refusal would be interpreted as an impolite action or would result in prejudice for the Company.

Many national and state governments have strict rules and laws regarding gifts and other business courtesies. Each of us must be familiar with such rules and laws when dealing with these governments.

Many of us may interact with government officials and employees of government and government agencies. We must comply with the laws and regulations that pertain to the acquisition of goods and services by our governmental customers. The laws, regulations and government ethics rules regarding the payment of honorarium fees and the offering of items of value to government officials and employees are varied and complex. No gifts, payments of any kind or any item of any value can be made or offered to any government official or employee without prior written approval of the Managing Director of the Company or the Chief Executive Officer of other individual subsidiaries of the Company (or any other officer that has been designated by the Company) and, where requested in accordance with the relevant "gift policy" adopted by each subsidiary, also by the Chief Compliance Officer in accordance with the Company's Global Compliance and Governance Plan.

### *Political Contributions*

Contributions of Company funds, directly or indirectly, or the use of Company assets or facilities for the benefit of government officials, political parties or political candidates anywhere in the world is prohibited unless approved in advance by representatives of the Compliance and Legal Departments in accordance with Company procedures.

Under no circumstances will the Company reimburse personal political contributions made by employees, representatives or consultants. Employees will not be treated any differently because of their party or political affiliation or as a result of making or failing to make any personal political contributions.

## **BUSINESS ENVIRONMENT**

### *Legislative Decree 231 of June 8, 2001*

As an Italian company, Lottomatica is subject to, among other laws and regulations, the provisions of Legislative Decree n. 231/2001 ("Decree 231"). Under Decree 231, companies or other legal entities may receive serious sanctions for the commission of certain crimes by their managers, directors, employees or consultants under their direction, in the interest or to the advantage of their company or entity. The adoption of Compliance programs designed to prevent the crimes included in Decree 231 may exempt the Company from liability in case of any commission of any of such crimes.

The most serious administrative sanctions provided are disqualification, such as the suspension or revocation of licenses and concessions, the prohibition to enter into certain contracts, the exclusion or revocation of financings and contributions, and the prohibition of advertising goods and services, as well as substantial monetary fines. Decree 231 also applies to crimes committed outside of Italy if the foreign public prosecutor does not start criminal proceedings and the act is not qualified as a crime by applicable law.

If a crime included in Decree 231 is committed, the Company may be exempted from liability if it proves that:

- a) before the commission of the crime, the Board of Directors has adopted and has put into effect compliance programs designed to prevent such crimes;
- b) an internal body of the Company, the "Supervisory Body", is appointed by the Board of Directors and is tasked with independent powers of control to monitor the effectiveness of the compliance programs;
- c) those who committed the crime violated the compliance programs;
- d) the Supervisory Body sufficiently monitored the compliance programs.

Each of us has an obligation to report to the Supervisory Body in a timely manner any known or suspected violations related to Decree 231 in connection to the following crimes:

- crimes committed against the Public Administration (e.g. bribery, corruption and fraud);
- certain company crimes (e.g. false company communications, accounting/financial fraud, fictitious formation of capital, stock manipulations);
- forgery of banknotes, revenue stamps and company trademarks and signs;
- terrorism;
- crimes against individuals;
- insider trading and market manipulation;
- manslaughter, accidental serious injuries occurred as a consequence of a violation of the rules regarding health and safety in the workplace;
- money laundering crimes;
- information technology crimes;
- criminal conspiracy crimes;
- crimes against industry and commerce (e.g. illegal competition by means of threat or violence, manufacturing of goods breaching third parties' intellectual property rights);
- intellectual property crimes.

Should the relevant conduct be committed in Italy, or in any case, with the cooperation of third parties, agents or representatives belonging to a company of the Group located in Italy, such reporting shall be done using the email address: [organismovigilanza@lottomatica.it](mailto:organismovigilanza@lottomatica.it). To report any of these violations anonymously, please use the Integrity Line (please refer to the *Avenues of Communication* section at the end of this Code).

### *Competition Laws and Gathering Competitive Information*

The purpose of competition laws, which may also be known as antitrust, monopoly, fair trade or cartel laws, are designed to create a level playing field in the marketplace and to promote fair competition. The Company will vigorously compete in the marketplace with integrity and will comply with competition and antitrust laws in all jurisdictions where it conducts business. Anyone who acts on behalf of the Company will not enter into any agreements, formal or informal, that seek to limit or restrict competition or exchange information regarding the marketing and sale of products and services. Unlawful agreements include those which seek to fix or control prices, allocate products, markets or territories, customers or suppliers, establish resale prices of a product, or condition the sale of products on an agreement to buy other Company products. The Company will use only proper and legal means of gathering marketing and business information concerning its competitors. The Company does not induce or solicit confidential information from a competitor's past or present employees.

Severe penalties may be assessed against companies and individuals who violate antitrust laws.

Therefore, it is the responsibility of each of us who has a question about potential antitrust implications to contact a representative of the Legal Department before any such action has taken place.

### *Insider Trading*

The Company's equity securities are publicly traded on the Milan Stock Exchange. Insider trading means buying or selling securities of a company while in possession of price-sensitive, non-public information about the company as well as communicating or disclosing such information. Insider trading is illegal because it gives certain individuals an unfair advantage in the marketplace. The Company is committed to fair and open markets for publicly traded securities throughout the world. Inside information is non-public, material information that a reasonable investor is likely to consider important in making a decision to buy or sell a security, including stock, bonds or options. We are prohibited from buying or selling any Company securities or influencing others to trade in such securities while we are aware of inside information about the Company that has not been disclosed to the public. Inside information may relate to Lottomatica or any other company doing business with Lottomatica, such as customers, vendors or business partners.

### *Market Manipulation*

The crime of market manipulation refers to any person who disseminates false information or sets up sham transactions or employs other devices concretely likely to produce a significant alteration in the price of financial instruments.

Therefore, we are prohibited from: (i) disseminating information, rumors or false or misleading news through the media, including the Internet, that give or are likely to give false or misleading signals as to the financial instruments; (ii) carrying out, buying, selling or placing orders to buy or sell which give, or are likely to give, false or misleading signals as to the supply of, demand for or price of financial instruments; (iii) carrying out, buying, selling or placing orders to buy or sell which secure the price of one or several financial instruments at an abnormal or artificial level; (iv) carrying out, buying or selling transactions or placing orders to buy or sell which employ fictitious devices or any other form of deception or contrivance; or (v) employing other fictitious devices likely to give false or misleading signals as to the supply of demand for or price of financial instruments.

### ***Improper Payments***

We are not allowed to give, promise, offer, or authorize a third party to make any payment or transfer of anything of value (e.g., money, goods or services), directly or indirectly, to a current or potential customer, supplier or government official or employee to obtain or retain business or to secure any improper advantage. Bribes, kickbacks or other unlawful or improper payments while conducting Company business are strictly prohibited.

This prohibition is absolute and applies at all times and in all countries where the Company conducts business whether or not there are any applicable laws which prohibit such a payment, loan or other action. Except in the very limited area of facilitating payments, where prior approval must be granted by a representative of the Compliance or Legal Departments, there can be no exceptions whatsoever regardless of the amount or form of payment involved or the ingenuity used in establishing a scheme or arrangement to conceal the true nature of the payment being made.

### ***Money Laundering Prevention***

The Company will conduct business only with reputable customers and suppliers who are involved in legitimate business activities and whose funds are derived from legitimate sources. Money laundering is the process by which money acquired through illegal means or intended for illegal purposes is converted so that the money appears to be legitimately acquired or becomes untraceable to those using it for illegal purposes. The Company's integrity and reputation can be severely damaged by failing to detect financial transactions which are attempts to launder money.

The Company is committed to complying fully with all applicable anti-money laundering laws throughout the world. In particular, as an Italian company, the Company is subject to, among other laws and regulations, the provisions of the Legislative Decree 231/2007 which adopts principles contained in applicable directives of the European Union regarding the prevention of money laundering and the presentation of the integrity of the financial system.

## **GLOBAL COMPLIANCE AND GOVERNANCE**

### ***Global Business Conduct***

The Company is committed to abiding by the laws and regulations that govern its business conduct worldwide. The laws of the countries in which the Company conducts business often extend to Company operations, business activities and Company employees throughout the world. Anti-bribery legislation, including Decree 231, the U.S. Foreign Corrupt Practices Act ("FCPA") and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, which prohibit bribery of foreign government officials and require proper record keeping and internal accounting controls, are of particular concern. There are also Italian and U.S. laws which prohibit participation in or cooperation with restrictive trade practices or economic boycotts imposed by other nations, as well as regulations on the export of certain products, services, technical data, and

software to other countries, as well as the re-export of those items from one non-U.S. destination to another.

The Company treats the FCPA as applicable to all majority-owned subsidiaries, including U.S. and non-U.S. entities. Operations proposing to enter into joint ventures or similar arrangements which contemplate transactions outside the U.S. should consult with a representative of the Legal Department to determine whether representations regarding FCPA compliance should be included in the contracts.

### *Global Compliance and Governance Plan*

As a company subjected to extensive global gaming laws and regulations and substantial oversight worldwide by lottery authorities and related governmental agencies and bodies, the Company is committed to the highest standard of business ethics and integrity and compliance with the laws and regulations governing its global business operations. This commitment is demonstrated by the Company's Global Compliance and Governance Plan.

The purpose of the Plan is to prevent, detect and correct violations of law and Company policies and procedures. The elements of the Plan include setting ethical business standards, communicating these standards, providing a mechanism for reporting potential exceptions and monitoring, auditing and maintaining an organizational structure that supports the furtherance of the Plan.

## AVENUES OF COMMUNICATION

*To report a compliance concern or violation of law related to any issue or specifically to Decree 231, please contact one of the following:*

**Call:** (401) 392-7600 or (39) 0651899025

<b>Write:</b>	<b><u>Compliance Department</u></b>	<b><u>Compliance Department and/or Supervisory Body</u></b>
	GTECH Corporation	Gruppo Lottomatica
	GTECH Center	Viale del Campo
	10 Memorial Boulevard	Boario 56/d
	Providence, RI 02903	00154 Roma, Italia

**Email:** [asktheboard@lottomatica.it](mailto:asktheboard@lottomatica.it)  
[compliance@gtech.com](mailto:compliance@gtech.com)  
[organismovigilanza@lottomatica.it](mailto:organismovigilanza@lottomatica.it)

*The Integrity Line, managed by an independent provider, is a confidential way to anonymously report activities that may involve unethical or unlawful conduct.*



### ***Legal Departments***

[www.gruppolottomatica.com](http://www.gruppolottomatica.com) and [www.gtech.com](http://www.gtech.com)

### ***Human Resources Departments***

[www.gruppolottomatica.com](http://www.gruppolottomatica.com) and [www.gtech.com](http://www.gtech.com)

### ***Policies and Procedures***

The Company maintains policies and procedures that supplement the principles in this Code. These materials are available at [www.gruppolottomatica.com](http://www.gruppolottomatica.com) and [www.gtech.com](http://www.gtech.com).

### ***Where Can I Get a Copy of the Code?***

The Code is available and may be downloaded from either the Lottomatica website ([www.gruppolottomatica.com](http://www.gruppolottomatica.com)) or from the GTECH website ([www.gtech.com](http://www.gtech.com)). Alternatively, a copy of the Code may be obtained through the Compliance Department.

## MAIN LEGISLATIVE REFERENCES

**Italian Legislative Decree 58/1998 or "TUF":** the Consolidated Law on Financial Intermediation is the main reference for the discipline and regulation of listed companies under the Italian law.

**Italian Legislative Decree no. 231/2001 or "Decree 231":** it introduced into the Italian legal system a regime of administrative responsibility (in practice, criminal liability) for companies and other entities for certain crimes committed, either in their interest or to their advantage, by their managers, directors or subjects subordinated to their direction or vigilance (e.g. employees, agents, suppliers, etc.). This responsibility is in addition to that of the individual who has committed the crime. The most serious administrative sanctions provide a ban from the activity, the suspension or revocation of licenses and concessions, the prohibition from entering into contracts with the Public Administration or its issues, the exclusion or the revocation of funding and grants, the prohibition of advertising goods and services and heavy fines.

**Italian Legislative Decree no. 196/2003 or "Italian Privacy Code":** the Consolidated Law on privacy legislation with the definition of the main tasks of Italian Guarantor of Privacy (Italian Authority instituted by the law n. 675 of December 31, 1996, for the control on the respect of the privacy legislation): a) to ensure that personal data processing is done in compliance with all applicable privacy laws and regulations; b) to publish the rules that regulate privacy issues and data security measures; and c) to avoid personal data processing when there is a risk of damaging the right to privacy.

**Italian Legislative Decree no. 30/2005 or "Intellectual Property Code":** the Legislative Decree no. 30 of February 10, 2005 and further amendments, that sets out a re-organization and rationalization of the laws regarding intellectual property in the Italian legal system and coordinates the Italian domestic laws with the EU and International laws on intellectual property.

**Italian Legislative Decree n. 231/2007:** implementation of directive 2005/60/CE on the prevention of the use of the financial system for the purpose of money laundering and terrorist financing and directive 2006/70/CE on its implementing measures.

**U.S. Foreign Corrupt Practices Act or "FCPA":** applicable to the Company's worldwide operations, the FCPA prohibits the Company, its employees, consultants, and affiliates from giving, paying, promising, offering, or authorizing the payment, directly or indirectly, of anything of value to a government official, political party or candidate for the purpose of obtaining or retaining business or for the purpose of influencing them to make decision that favors the Company's interests or to secure some other improper advantage. The FCPA also has accounting provisions which require U.S. companies and their majority-owned affiliates to keep accurate and complete records of transactions in which they engage. The consequences of violating the FCPA are severe for both the Company and the individuals involved.

**Antitrust and Competition Laws:** a set of rules in each legal system which protect the competition of economics markets, preventing companies, separately or jointly, from compromising the regular economic competition with actions which establish strict agreements of competition, abuse of a dominant position and concentrations which are used to create a dominant position.

**OECD Convention on Combating Bribery of Foreign Public Official in International Business Transactions:** an international agreement whose aim is to reduce the corruption in developing countries by encouraging sanctions against bribery in international business transactions carried out by companies based in the Convention member countries.