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# Anti-Bribery Policy

Owner: Compliance Department

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### 1. Purpose and Scope

It is the policy of Light & Wonder to maintain the highest level of professional and ethical standards in the conduct of its business. At Light & Wonder, we support and encourage a culture of innovation that fosters respect, integrity, creativity, collaboration and continuous improvement. We keep our commitments to our customers, suppliers, regulators, shareholders, and colleagues in a world that is increasingly complex and challenging. The key to our success is an equally strong commitment to doing business ethically and responsibly. Our reputation depends largely on the support of every employee in this endeavor. We sum this up in the first of our core values: Uphold Integrity

### 2. Scope

This policy applies globally to all employees of Light & Wonder Inc., as well as its direct and indirect subsidiaries (collectively “L&W” or “the Company”). Certain representatives of the Company, such as Foreign Contractors (as defined below), may also be contractually bound by this policy.

### 3. Definitions

*“Facilitation Payment”* - (sometimes referred to as a “grease Payment” or “expediting payment”) is a small payment, usually in cash, that is made to speed up the provision of routine governmental services such as processing permits, providing police protection, or activating utility services, where no element of discretion is involved of the government official.

*“FCPA”* – United States Foreign Corrupt Practices Act

*“Foreign Contractor”* - as used in this Policy and related documents includes distributors, sales agents, consultants, joint venture partners, advisors, outside legal counsel, representatives, brokers, governmental or tax consultants and anyone providing material services that are substantially related to or are for the purpose of maintaining or retaining business or a business advantage for the Company in a country other than the United States.

*“Foreign Official”* - includes any elected or appointed official or employee of a foreign government, political party or international organization (for example, an employee of the World Bank), as well as a member of a royal family or non-U.S. military, or a candidate for a foreign public office. A person acting as an agent for, or on behalf of, a foreign government may also be deemed a Foreign Official.

*“UKBA”* – United Kingdom Bribery Act

## 4. Requirements

In adhering to this Policy, employees responsible for working with Foreign Contractors must understand the requirements of all applicable United States and host-country laws and regulations that apply to the conduct of the Company's business, including but not limited to the FCPA and the UKBA. Such applicable anti-bribery statutes apply to the overseas activities of United States and U.K. companies, their employees and agents. In substance, they prohibit:

- (i) giving or offering to give, directly or indirectly, anything of value to a Foreign Official,
- (ii) to obtain or retain business or obtain any improper advantage, (such as favorable tax or customs treatment),
- (iii) in a corrupt manner, i.e., induce the recipient to misuse his or her position to obtain a business or other advantage.

In addition, one can be held to violate anti-bribery laws by authorizing or making an offer or payment to a third party, e.g. a sales agent or distributor, with reason to know that all or a portion of the payment would be used for an improper purpose, such as providing a benefit to a Foreign Official in order to obtain an improper business advantage.

This Policy prohibits the Company and Foreign Contractors or other persons or entities acting on the Company's behalf from requesting, accepting, offering, promising, paying or authorizing the payment of anything of value (such as a bribe or kickback) to any private individual or Foreign Official to improperly influence any official business or government act or decision of the private individual or official or of the government or party, or to reward the private individual or Foreign Official for taking action or not taking



action. Company personnel may not engage in any conduct in furtherance of such a request, acceptance, offer, promise, or payment, including conduct by any third parties, whether acting as intermediaries or otherwise.

Anti-bribery laws also require publicly traded companies to keep accurate records and to maintain a system of internal accounting controls sufficient to give reasonable assurance that all Company books, records, accounts and other documents are maintained in reasonable detail and accurately reflect the facts, transactions and events recorded. Therefore, payments not accurately recorded may violate these laws. These requirements are intended to address the following types of activity: (i) the failure to record transactions to conceal illegality; (ii) the falsification of records to conceal illegal transactions; and (iii) the generation of records that are facially accurate, but fail to disclose aspects of the transaction.

In sum, the anti-bribery laws impose substantial obligations upon companies and their employees conducting business abroad and allow for substantial penalties for violating those obligations. Accordingly, great care must be taken to scrutinize all aspects of foreign transactions whether they involve a private party or any type of Foreign Official or governmental or quasi-governmental action. This is especially important in dealing with foreign entities where the line between governmental and private concerns is not always readily apparent. The Company strictly complies with the laws of the countries in which we do business and as a U.S.-based company, we also comply with U.S. or other laws that govern our activities worldwide. In order to comply with these laws, we may not bribe or attempt to bribe a Foreign Official or engage in commercial bribery. The Company condemns corruption in all its forms. We have zero tolerance for bribery and any other forms of corruption.

Each employee with responsibility for retaining or supervising Foreign Contractors has an obligation to become familiar with the requirements of the FCPA, UKBA and all other relevant anti-bribery laws in the locale in which they operate and to adhere at all times to those requirements. Annual training administered by the Compliance Department will be provided to eligible employees, and at the discretion of the Company certain Foreign Contractors, see section II.B. on page 4. When any question or uncertainty arises with respect to those requirements, it is the obligation of each affected employee to seek guidance from the Chief Legal Officer, or designee, or the Chief Compliance Officer. Employees may also reach out to their department head or the Compliance Department's senior staff with general inquiries or uncertainties.

To ensure compliance with these laws, the Company has adopted this formal Anti-Bribery Policy. Compliance with this Policy and its procedures is mandatory. Although the Company will make every effort to provide pertinent information to all personnel and respond to all inquiries, no educational or training program, no matter how comprehensive, can anticipate every situation that may present compliance issues. Responsibility for compliance, INCLUDING THE DUTY TO SEEK GUIDANCE WHEN IN DOUBT, rests with each employee of the Company. Any employee seeking guidance should contact any of the following



individuals: Chief Compliance Officer; Chief Legal Officer, or their designee. Alternatively, employees and agents may openly or anonymously (where anonymous calls are allowed by law) call the EthicsPoint Hotline (888-475-9507). Please consult the Light & Wonder website at [www.scientificgames.ethicspoint.com](http://www.scientificgames.ethicspoint.com) for further information, including international toll-free numbers. All calls to the EthicsPoint Hotline are confidential.

## 5. Compliance

### I. ANTI-BRIBERY - POLICY ROLES and RESPONSIBILITIES

#### A. Legal Department and Compliance Department

The Legal Department and Compliance Department share in the responsibility for the implementation and administration of this Anti-Bribery Policy, including:

- (a) Overseeing the administration of the Anti-Bribery Policy and ensuring that it is enforced consistently;
- (b) Reviewing this Anti-Bribery Policy periodically, including an annual risk-based assessment, to evaluate this Policy's effectiveness, and recommending changes when necessary or appropriate;
- (c) Investigating suspected violations of the FCPA, UKBA and other anti-bribery laws or this Policy;
- (d) Ensuring that the Company has taken all reasonable steps to respond appropriately in the event a violation has been detected to prevent similar violations from occurring, including reporting the conduct to the Board of Directors;
- (e) Ensuring the Company conducts adequate anti-bribery due diligence regarding mergers, acquisitions, or strategic alliances.

#### B. Compliance Department

- (a) Implementing the Anti-Bribery Training Program;
- (b) Overseeing the Anti-Bribery Training Program;
- (c) Conducting due diligence investigations, pursuant to the Company's Compliance Plan, including identifying red flags, and maintaining files on each Foreign Contractor and, when relevant to this Policy, each prospective Foreign Contractor;
- (d) Assisting the Legal Department in conducting anti-bribery due diligence regarding mergers, acquisitions, or strategic alliances.

**C. Finance Department**

The FCPA also requires publicly traded companies, like L&W, to keep accurate records and to maintain a system of internal accounting controls sufficient to give reasonable assurance that transactions have proper authorization.

(a) The Finance Department is responsible for keeping accurate books and records in accordance with federal and local anti-bribery laws. Payments not accurately recorded may violate the statute and, therefore, compliance with accounting and internal control requirements is essential. Examples of inaccurate books and records include:

- (i) failing to record a transaction to conceal its illegality;
- (ii) creating false records to camouflage an improper transaction;
- (iii) generating records that appear accurate on their face but fail to disclose aspects of the transaction.

We must each do our part to make certain that the business records and financial documents that our Company creates and uses are accurate and honest. While it may not seem as though the information we generate has an impact on our Company's financial records or internal controls, we all play a role in ensuring this important duty is fulfilled. Therefore, every piece of data or information that we submit in Company records - including all documents and materials that are required to be prepared under the Policy - must be absolutely honest, accurate and complete. Records must be submitted in a timely fashion and be completely clear. We must all follow our Company's system of internal controls and all applicable accounting requirements when recording this data.

In sum, compliance with the accounting and internal controls procedures of the Company is mandatory. All accounting records, expenditures, expense reports, invoices, vouchers, gifts, business entertainment and any other business records and transactions must be accurately and reliably reported and recorded. Creating undisclosed or unrecorded payments are strictly prohibited. False or misleading documents or entries will result in appropriate disciplinary action.

**II. Facilitation Payments**

While the FCPA contains an exception for certain types of facilitating payments to a Foreign Official, such payments may be unlawful under the anti-bribery laws of other countries. Accordingly, facilitating payments are strictly prohibited unless written permission is first obtained from the Chief Legal Officer, or designee, or Chief Compliance Officer.

However, when a payment is extorted by an imminent threat to the health, safety or welfare of an employee, the demanded payment may be made. The imminent threat *must* relate to the health, safety or welfare of an employee. Once the immediacy of the situation has been resolved, the payment must be reported in writing to the Chief Legal Officer, or designee, and Chief Compliance Officer. All such payments must be accurately and transparently recorded in the Company's books and records. However, threats of commercial harm to the Company (e.g., withholding approval of a license, awarding a contract to a competitor) do not constitute grounds to make a facilitation payment.

All requests for bribes, facilitation payments, other potentially improper payments (e.g., kickbacks) and any attempt to extort an employee or third party working on behalf of the Company, whether made by a Foreign Official or a private party, must be reported immediately in writing to the Chief Compliance Officer and the Chief Legal Officer, or designee.

### **III. Employee Obligations and Reporting Procedures**

#### **(1) Specific Employee Obligations under the Anti-Bribery Policy**

*Reporting Obligation* – Employees must immediately report any suspected or actual violation of the FCPA, UKBA or other applicable anti-bribery laws (whether or not based upon personal knowledge) to the Chief Compliance Officer, who will then report said information to the Chief Legal Officer, or designee. Alternatively, an employee may contact the EthicsPoint Hotline. Employees may call the EthicsPoint Hotline anonymously. All calls to the EthicsPoint Hotline are confidential. This obligation is ongoing, and the employee has an obligation to update the report if he or she obtains new information. Under no circumstances will the report of such information be the basis for any retaliatory action whatsoever against the employee making the report.

#### **(2) Company Assessment of Employee Performance**

The Company will consider employees' adherence to Light & Wonder's ethical standards, including compliance with this Policy, as an important element of employee reviews and opportunities for advancement. Likewise, an employee's failure to abide by these ethical standards may result in appropriate action by the Company as summarized below.

a. *Violation of Applicable Law* – If an employee violates any applicable law in the course of his or her employment, then the employee will be subject to appropriate disciplinary action, including, without limitation, termination, suspension, demotion, reduction in pay, and/or reprimand.

b. *Breach of Anti-Bribery Policy* – Employees will also be subject to disciplinary action by the Company for failure to cooperate in implementing and adhering to the Anti-Bribery Policy.

### **IV. Gifts, Meals and Hospitality, and Travel and Entertainment**

Providing gifts and entertainment to private individuals or to Foreign Officials may violate the FCPA, UKBA or other applicable anti-bribery laws and this Policy, as well as the Code of Business Conduct. In addition, Company employees should be attentive to policies and procedures that may limit a Foreign Official, or a representative of a commercial customer or potential customer from accepting gifts, entertainment or travel. Employees must consult and strictly adhere to the Company's Gifts and Entertainment Policy, and the relevant gift sections found in the Code of Business Conduct.

## **V. Political Contributions and Charitable Donations**

Political contributions and charitable donations to persons outside the United States may raise anti-bribery issues. A political contribution may never be made in order to improperly influence a Foreign Official and thereby obtain or retain business or otherwise gain a business advantage. Political contributions are separately governed by the Company's Code of Business Conduct which must be consulted and followed before any political contributions are made to any persons including persons outside the United States.

A charitable donation must never be made in order to improperly influence the recipient and thereby obtain or retain business, or otherwise gain a business advantage. Any donation must comply with any local laws or regulations that limit or prohibit a Foreign Official from soliciting or accepting a charitable donation from the Company. Thus, charitable donations must be made publicly, transparently and with full disclosure of the Company's involvement.

A charitable donation must be pre-approved by the Chief Compliance Officer. An employee wishing to make such donation must notify the Corporate Communications Team and be entered into the Charity Tracker database or notify the Chief Compliance Officer directly. A charitable donation made to any person or company outside the United States must receive prior written approval from the Chief Compliance Officer.

## **6. Revision History**

The following table describes the modifications to the most recent version of this document. The modifications to the previous versions can be seen in the respective document stored in the archived repository. The author is to describe the modifications as clearly as possible.

| Version | Date       | Modifications                                                                                      | Changed by:                      |
|---------|------------|----------------------------------------------------------------------------------------------------|----------------------------------|
| 1.0     | 08/30/2016 | First approved document                                                                            | Compliance Department            |
| 2.0     | 11/26/2018 | Name change from Anti-Corruption Policy to Anti-Bribery Policy and align all references throughout | Compliance Department            |
| 3.0     | 12/07/2020 | Formatted to new policy template                                                                   | Regulatory Compliance Department |
| 4.0     | 06/06/2022 | Updated to Light & Wonder                                                                          | Regulatory Compliance Department |