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# CONFLICT MINERALS POLICY

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## 1. SCOPE

Brightstar Lottery and its subsidiaries (collectively, “Brightstar” or the “Company”) recognize that the use of Gold, Tin, Tantalum, and Tungsten (commonly referred to as “3TG”) are necessary components in the manufacturing of certain Covered Products<sup>1</sup> manufactured by the Company. While Brightstar relies on various third-party vendors and suppliers (each, a “Supplier” and together, the “Suppliers”), the Company stands committed to ensuring that any 3TG or any “Conflict Minerals”<sup>2</sup> contained within its Covered Products that originate from the Democratic Republic of the Congo (the “DRC”) or adjoining countries (including Angola, Burundi, Central African Republic, Congo Republic, Rwanda, South Sudan, Tanzania, Uganda, and Zambia) (together, the “Covered Countries”) are DRC conflict-free, meaning that such Covered Products do not contain Conflict Minerals whose proceeds directly or indirectly finance or benefit armed groups in any of these Covered Countries.

## 2. REFERENCES

This policy is supported by recognized international standards, regulations, and industry frameworks that guide responsible sourcing and due diligence practices for conflict minerals. The following references establish the foundation for our approach and ensure alignment with applicable legal and sustainability requirements.

- U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act (Section 1502)
- SEC Conflict Minerals Rule (17 CFR Parts 240 and 249b)
- EU Conflict Minerals Regulation (EU) 2017/821 (if you operate in or supply into the EU)
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (including relevant OECD Supplements for 3TG: tin, tantalum, tungsten, gold)
- UN Guiding Principles on Business and Human Rights (UNGPs)

## 3. PURPOSE

This Policy supports the delivery of Brightstar Lottery’s (Brightstar) sustainability strategy, which is guided by three key elements: Empowering Our People, Collaborating with Partners, and Preserving the Planet.

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<sup>1</sup> “Covered Products” means the Company’s manufactured or contracted for manufacture land-based machine products (including, but not limited to, lottery terminals, instant ticket vending machines, printers, monitors, ticket scanners, and peripheral terminal devices).

<sup>2</sup> SEC Rule 13p-1 and Form SD definition of “conflict mineral” includes cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tin, tantalum and tungsten, unless the U.S. Secretary of State determines that additional derivatives are financing conflict in the Covered Countries, in which case they are also considered “conflict minerals; or any other minerals or their derivatives determined by the U.S. Secretary of State to be financing conflict in the Covered Countries.

These elements are activated through six spheres of impact, which are dedicated actions that ignite change. They include employee engagement; human rights; responsible gaming; community engagement; sustainable procurement; and climate action, biodiversity, and circularity.

This Policy is linked to the sustainable procurement sphere of impact, which supports two of the Company’s three sustainability pillars — Collaborating with Partners and Preserving the Planet.

The Company’s sustainable procurement initiatives support four Sustainable Development Goals (SDGs), as defined by the United Nations (UN). They include:

SDGs	
	<p>Goal 7: Affordable and clean energy. Ensure access to affordable, reliable, sustainable, and modern energy for all.</p>
	<p>Goal 8: Decent Work and Economic Growth Promote sustained, inclusive and sustainable economic growth,</p>
	<p>Goal 12: Responsible consumption and production. Ensure sustainable consumption and production patterns.</p>
	<p>Goal 13: Climate action. Take urgent action to combat climate change and its impacts.</p>

Under the rules of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“Dodd-Frank”), as implemented by the U.S Securities and Exchange Commission (the “SEC”) under Rule 13p-1 (the “Rule”) and Form SD under the Securities Exchange Act of 1934, as amended (the “Exchange Act”), publicly traded companies that manufacture or contract to manufacture products that contain 3TG necessary to the functionality or production of the products are required to make public disclosure about the origin of the 3TG and the company’s due diligence on the source and chain of custody of those minerals.

As a global organization, Brightstar also adheres to the EU Regulation on Conflict Minerals. This regulation recognizes the same minerals as Dodd-Frank; however, it expands the geographic focus to include Conflict-Affected and High-Risk Areas (“CAHRAs”) defined as “areas in a state of armed conflict, fragile post-conflict areas, as well as areas witnessing



weak or non-existing governance and security, such as failed states, and widespread and systematic violations of international law, including human rights abuses.” An indicative, non-exhaustive and regularly updated list of **CAHRAs**. is available at [www.cahraslist.net](http://www.cahraslist.net).

#### 4. PRINCIPLES

##### Brightstar Conflict Minerals Diligence Program and Due Diligence Process

Brightstar has implemented a due diligence program to identify and trace Conflict Minerals (and, specifically, 3TG) in the Company’s supply chain for Covered Products, which are based on procedures and tools provided by the Electronic Industry Citizenship Coalition<sup>3</sup> (the “EICC”) <sup>3</sup>, the Global e-Sustainability Initiative<sup>4</sup>(the “GeSI”) and the Organization for Economic Cooperation and Development (the “OECD”) guidelines for responsible supply chains of minerals from conflict-affected and high-risk areas.

Brightstar commits to identifying, reducing and eliminating the use of Conflict Minerals supplied to the Company whose proceeds directly or indirectly finance or benefit armed groups in the DRC and Covered Countries. The Company will complete due diligence activities on all direct Suppliers, which will be governed by policies, procedures and due diligence management systems designed to prevent Conflict Minerals from entering the supply chains. Brightstar has communicated the Supplier Code of Conduct (the “Supplier Code”) to each Supplier, and the Company expects that Suppliers will complete appropriate due diligence of their supply chain to identify, disclose and take remedial action if their product(s) contain Conflict Minerals that finance conflict in the DRC or any of the Covered Countries.

To confirm compliance with the Supplier Code, Brightstar’s due diligence efforts will seek to:

- ensure each Supplier complies with the Supplier Code by adopting policies, procedures and due diligence management systems designed to prevent Conflict Minerals from entering the supply chain and compliant with the Responsible Means Assurance Process<sup>5</sup>(the “RMAP”) developed by the Responsible Business Alliance (the “RBA”)<sup>6</sup>;
- engage with each Supplier’s own upstream suppliers and supply chain to determine the source and chain of custody of any product(s) supplied to the Supplier that may contain Conflict Minerals;

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<sup>3</sup> The EICC offers membership to companies that manufacture or contract the manufacture of electronic goods or of products in which electronics are essential.

<sup>4</sup> The GeSI is an inclusive and multi-sectoral, multi-stakeholder organization that sources impartial information, resources and best practices for achieving integrated social and environmental sustainability in collaboration with members from major information and communication technology companies.

<sup>5</sup> The RMAP was developed by the RBA to enhance company capability to verify the responsible sourcing of metals.

<sup>6</sup> The RBA is the world’s largest industry coalition dedicated to corporate social responsibility in global supply chains.



- identify products containing Conflict Minerals and provide a plan of mitigation and/or remediation to remove Conflict Minerals from said product(s); and
- identify the presence of 3TG and other Conflicts Minerals in their products by requiring that Suppliers complete and submit the **Conflict Minerals Reporting Template** (the “CMRT”) annually, which promotes supply chain transparency and identifies the smelters and refiners utilized by each Supplier in the delivery of their product(s).

Note: If 3TG, as defined by the Responsible Minerals Initiative (“RMI”) CMRT, or Conflict Minerals are sourced from a smelter or refiner that is not included on the RMI Conformant Smelter & Refiner Lists (the “Conformant Lists”) then the name and country of the mine must be provided. The Conformant Lists represent the smelters and refiners that have successfully completed an assessment against the applicable RMAP standard or an equivalent cross-recognized assessment.

Brightstar will suspend or discontinue any business transactions with a Supplier after failed attempts at mitigation or remediation of non-conformance with the Supplier Code until such time that Supplier becomes fully conformant or provides a plan within a reasonable timeframe to become conformant.

## 5. IMPLEMENTATION AND MONITORING

### Conflicts Mineral Report and Regulatory Reporting on Form SD

On an annual basis, Brightstar furnishes Form SD to the SEC in accordance with the Rule. Form SD is an Exchange Act form implemented to satisfy special disclosure requirements under Dodd-Frank relating to Conflict Minerals contained in Covered Products that the Company manufactures (or contracts to be manufactured) and necessary to the functionality or production of those Covered Products. In support of its disclosure obligations under the Rule, Brightstar produces the Company’s Conflict Mineral Report (the “Report”), and the Report is included as an exhibit the Form SD filing.

The Procurement Governance team integrates conflict minerals monitoring into supplier onboarding by requiring new suppliers to complete questionnaires and commit to responsible sourcing standards aligned with regulatory and industry frameworks.

Throughout the year, the team conducts ongoing evaluations through periodic data refreshes, risk assessments, and supplier engagement to address gaps, validate sourcing practices, and ensure continuous compliance with conflict minerals requirements.

## 6. COMMUNICATION AND TRAINING

### Escalation Procedure for Non-Conformance

Brightstar maintains the Communication and Escalation Procedure for Supplier Noncompliance with the Conflict Minerals Policy and Supplier Code of Conduct, which governs the Company’s response to Supplier non-compliance.



### Brightstar Integrity Line

Employees who have concerns regarding non-compliance with this Policy and/or violations of law related to Conflict Minerals may contact the Brightstar Integrity Line to report such incidents. Maintained by an independent provider, the Brightstar Integrity Line provides a confidential way to anonymously report non-compliance or violations via telephone or the online portal, contact details of which may be found [here](#).

Brightstar Lottery posts this policy in its current version and any subsequent updates to [brightstarlottery.com](http://brightstarlottery.com)

## 7. ROLES AND RESPONSIBILITIES

Procurement Governance Team leads this effort through setting and enforcing sourcing policies, ensuring regulatory and ethical compliance across jurisdictions, managing supplier risk, and maintains fair, transparent, and accountable procurement practices aligned with business and public trust requirements.

If you have any concerns or questions about the content of this document, or to get support from BRIGHTSTAR to help build your capabilities in relation to any of the areas detailed in the Supplier Code of Conduct, please send questions to [Procurement.Operations@Brightstarlottery.com](mailto:Procurement.Operations@Brightstarlottery.com).

## 8. HISTORY OF THE DOCUMENT

History of the Document		
Date	Version	Updates
May 2026	Updated to Brightstar	Final

## 9. DEFINITIONS, ABBREVIATIONS & ACRONYMES

Term / Acronym	Definition
3TG	Tin, Tantalum, Tungsten, and Gold
CAHRAs	Conflict-Affected and High-Risk Areas
CMRT	Conflict Minerals Reporting Template
Conflict Minerals	Minerals (including 3TG) whose extraction or trade may finance or benefit armed groups, particularly in Covered Countries

<b>Conformant Lists</b>	RMI list of smelters and refiners validated against RMAP or equivalent standards
<b>Covered Countries</b>	Democratic Republic of the Congo (DRC) and adjoining countries (Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia)
<b>Covered Products</b>	Products manufactured or contracted to be manufactured by Brightstar that contain 3TG necessary to their functionality or production
<b>DRC</b>	Democratic Republic of the Congo
<b>DRC Conflict-Free</b>	Products that do not contain Conflict Minerals that directly or indirectly finance or benefit armed groups in Covered Countries
<b>Due Diligence</b>	A risk-based process to identify, assess, and mitigate risks in the supply chain of Conflict Minerals
<b>EICC</b>	Electronic Industry Citizenship Coalition (now Responsible Business Alliance – RBA)
<b>EU Regulation 2017/821</b>	European Union regulation governing responsible sourcing of conflict minerals
<b>GeSI</b>	Global e-Sustainability Initiative
<b>OECD</b>	Organization for Economic Co-operation and Development
<b>OECD Guidance</b>	OECD Due Diligence Guidance for Responsible Supply Chains of Minerals
<b>RBA</b>	Responsible Business Alliance
<b>RMAP</b>	Responsible Minerals Assurance Process
<b>RMI</b>	Responsible Minerals Initiative
<b>SEC</b>	U.S. Securities and Exchange Commission
<b>SDGs</b>	Sustainable Development Goals (United Nations)
<b>Supplier</b>	Any third-party vendor providing materials, products, or services to Brightstar
<b>Supplier Code</b>	Brightstar Supplier Code of Conduct
<b>UN</b>	United Nations
<b>UNGPs</b>	UN Guiding Principles on Business and Human Rights