

Stakeholder engagement policy
September/2026



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1. Objective

The Board of Directors of Cirsa Enterprises, S.A. (the "**Company**") considers that active and structured engagement with stakeholders is an essential element for the sustainable development of the business model and for the creation of long-term value for Cirsa Enterprises, S.A. and its subsidiaries (the "**CIRSA Group**" or the "**Group**").

The CIRSA Group operates as an international group operating in the leisure and entertainment sector, offering a comprehensive gaming proposal in a responsible, innovative and modern environment. The Group recognises the importance of all stakeholders in its success and is committed to establishing strong and lasting relationships with them.

In this context, the Stakeholder Engagement Policy (the "**Policy**") sets out the general framework for identifying, understanding and managing our stakeholder relationships, aligned with the principles of sustainability and the creation of shared value.

2. Scope of application

This Policy applies to all CIRSA Group companies over which the Group exercises effective control and, in particular, to their directors, managers and employees, who must follow the principles and good practices established therein in their actions.

3. Definition of stakeholders

Stakeholders of the CIRSA Group are considered to be all those persons, organizations or entities that have a legitimate interest in the Company's activities and, in particular, shareholders, employees, customers, suppliers, local communities, government, non-governmental organizations (NGOs), the media and competitors.

4. Guiding principles

This Policy is based on the following guiding principles:

- Transparency: communicate relevant information to all stakeholders in a clear and timely manner.
- Dialogue: Encourage an open and constructive dialogue with all stakeholders.
- Respect: Treat all stakeholders with respect and fairness.
- Responsibility: taking responsibility for decisions and actions that affect stakeholders.
- Sustainability: Integrating sustainability into all company decisions and operations.
- Good Corporate Governance: identify, analyse and adopt the best practices, principles and recommendations in relation to it.
- Continuous improvement: periodic review of the mechanisms to ensure that the stakeholder relationship strategy is effective.

5. Roles and responsibilities

The CIRSA Group will adopt the necessary control mechanisms and will dedicate sufficient and adequately qualified human and material resources to ensure, in coordination with its strategy and business management, compliance with this Policy.

6. Communication channels and double materiality

At the CIRSA Group, we establish and maintain various communication channels to facilitate dialogue with stakeholders, including: regular meetings, surveys, sustainability reports, social networks and customer service lines. Likewise, on a regular basis, in the field of double materiality analysis, we identify the most relevant aspects for stakeholders and for the company's financial performance. Once identified, they are classified and prioritized to develop the relationship strategy and dialogue tools with each of them.

7. Decision-making process

The perspectives of stakeholders will be considered in all the company's strategic decisions through double materiality analysis, impact assessment and stakeholder consultation when necessary. In this way, we establish our objectives, define the sustainability action plan and evaluate our ability to respond to society's expectations.

8. Engagement with specific stakeholders

In line with the principles set out in this Policy, the CIRSA Group establishes specific commitments with its main stakeholders, taking into account their expectations, the nature of the relationship maintained and its impact on the Group's activity and results. These commitments guide the Group's actions in its relationship with each stakeholder and contribute to strengthening responsible, transparent and sustainable management.

- Shareholders and Investors: facilitate access to relevant information, organize regular meetings and promote transparent communication.
- Employees (and their representatives): foster a safe and healthy work environment, provide career development opportunities, and promote equality, diversity, and inclusion.
- Customers: offer quality products and services, guarantee customer satisfaction and efficiently manage complaints and claims, offering a safe environment under the strictest processes in terms of responsible gambling.
- Suppliers and business partners: Establish long-term relationships with ethical and responsible suppliers, promote fair and transparent business practices, and foster innovation.
- Local communities: contribute to the economic and social development of the communities where it operates, minimize the environmental impact of its operations, and participate in community initiatives.
- Public administrations and regulators: comply with all applicable laws and regulations and collaborate with government authorities on initiatives of common interest, only operating in regulated markets.
- Civil society organisations (including NGOs): maintain an open dialogue on relevant issues and explore collaborations aligned with the Group's strategy and commitments, where appropriate.
- Media: Maintain an open and transparent relationship with the media and provide accurate and timely information.
- Sectoral level: participate, where appropriate, in sectoral forums and associations to contribute to the debate and improvement of practices, always acting in accordance with the applicable regulations (including the defence of competition) and the Group's internal policies.

9. Approval, validity and dissemination

The Stakeholder Engagement Policy has been approved by the Board of Directors of Cirsa Enterprises, S.A. at its meeting on 25 September 2026, entering into force on the same date.

Its content will be subject to periodic review when appropriate in order to adapt it to regulatory changes or incorporate best practices in the field, its last review having taken place on 28 July 2026. The Board of Directors will be the competent body for its modification, after supervision by the Sustainability, Technology and Innovation Committee.

The Policy will be available on the Group's intranet. It will also be made available to third parties by publishing it on CIRSA's website.

The Spanish version of this document will prevail in the event of any discrepancy or dispute.

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