



# IGT™

## MODERN SLAVERY STATEMENT

International Game Technology PLC

Financial year ended 31 December 2022

### INTRODUCTION

"Modern Slavery" is a crime and a violation of fundamental human rights. It takes various forms including slavery, servitude, forced or compulsory labor, as well as human trafficking, all of which have, in common, the deprivation of a person's liberty in order to exploit them for personal or commercial gain. The U.K. government is committed to tackling modern slavery in all its forms and the U.K. Modern Slavery Act 2015 requires organizations to promote ethical business practices and policies that protect workers from being abused and exploited in their own organizations and supply chains.

This annual statement describes the activities that International Game Technology PLC and its subsidiaries (jointly referred to as "IGT" or the "Company") are undertaking to prevent modern slavery in its business operations and global supply chains.<sup>1</sup>

### ABOUT IGT

IGT is a global leader in gaming that delivers entertaining and responsible gaming experiences for players across all channels and regulated segments, from Lotteries and Gaming Machines to Digital Gaming and Sports Betting. Leveraging a wealth of compelling content, substantial investment in innovation, player insights, operational expertise, and leading-edge technology, the Company's solutions deliver gaming experiences that responsibly engage players and drive growth. The Company has a well-established local presence and relationships with governments and regulators around the world, and creates value by adhering to the highest standards of service, integrity and responsibility.

IGT had a global annual revenue in excess of \$4.2 billion and 10,786 employees at 31 December 2022.

IGT is committed to responsible gaming, giving back to the communities in which it operates, protecting the environment, and preventing and mitigating risks of human rights violations related to its global operations.

International Game Technology PLC is listed on the New York Stock Exchange.

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<sup>1</sup> This statement covers International Game Technology PLC and all of its subsidiaries, including IGT UK Interactive Limited which met the legal threshold required to produce a modern slavery statement. All previous IGT's Modern Slavery Statements are accessible from [IGT's webpage](#).

IGT (Australia) Pty Limited and its wholly owned subsidiary, International Game Technology (NZ) Limited, were also required by law in Australia to publish a modern slavery statement for the 2021 financial year (1 January 2021 - 31 December 2021) accessible from the [Australian Government's Online Register for Modern Slavery Statements](#).

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#### International Game Technology PLC

Registered office: 3<sup>rd</sup> Floor, 10 Finsbury Square, London EC2A 1AF

Registered in England and Wales with company 09127533



## SUPPLY CHAIN

IGT's supply chain is both direct and indirect. IGT's direct supply chain is associated with materials purchased for use in its own product manufacturing process which follows procedures established by the International Organization for Standardization ("ISO")<sup>2</sup>. IGT's indirect supply chain consists of purchases of third-party off-the-shelf products that are typically manufactured for the general public and are used for IGT's customer solutions, as well as for internal business infrastructure.

The Company purchases most of the parts, components, and subassemblies necessary for its lottery terminals and electronic gaming machines from outside sources, and outsources the manufacturing and assembly of certain gaming and lottery terminals to third-party vendors.

## IGT APPROACH TO MODERN SLAVERY

IGT has a zero-tolerance approach to modern slavery and will not support it anywhere in its business or supply chain. IGT is committed to acting ethically and with integrity in all its business dealings and relationships, and to implementing and enforcing effective systems and controls to reduce and possibly prevent the risk of the Company doing business with any entity or individual that practices, or tolerates, or in any way favors modern slavery.

Our **Whistleblower Policy** encourages employees to raise concerns about conduct believed to be unethical, or which are potential violations of IGT's policy, regulation or law. IGT's Integrity Line, managed and operated by an independent third-party provider, offers access for reporting suspected or known activities that may involve unethical or unlawful conduct either by phone or through a protected online portal. Any such reports could also be submitted to IGT's Compliance team either by phone, post or email. All reports to the Integrity Line can remain anonymous if desired, and IGT has a strict policy prohibiting any form of retaliation or intimidation against an individual for raising a concern about potential misconduct. Employees can also report suspected or known wrongdoing to the People & Transformation team or management.

IGT's **Code of Conduct**<sup>3</sup>, shared with all employees, sets out the standards of ethics and behavior expected from its employees, directors, officers and consultants, as well as third parties, agents, or representatives who deal with or act on behalf of IGT. The Code of Conduct also sets out IGT's commitment to providing equal employment opportunity and a safe workplace for all employees.

Our **Human Rights Policy Statement**<sup>4</sup> sets out IGT's commitment to advancing human rights within IGT and the communities in which the Company does business, particularly as they relate to the Company's employment practices and alongside the entire value chain. The policy reaffirms IGT's commitment to prohibiting child and forced/compulsory labor, providing equal opportunity in employment and a work environment that values workplace diversity and respect for all employees, as well as providing fair working conditions for all employees including terms and conditions of employment, remuneration, working hours, health and safety, holiday entitlements

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<sup>2</sup> An independent, non-governmental organization made up of members from national standards bodies, that develops international standards and specifications for products, services and systems to ensure quality, safety and efficiency.

<sup>3</sup> The Code of Conduct is available at [IGT's webpage](#).

<sup>4</sup> The Human Rights Policy Statement is available at [IGT's webpage](#).



and benefits, subject to territory-specific labor law and/or applicable collective bargaining agreements, if any.

The Supplier Code of Conduct<sup>5</sup> (the “**Supplier Code**”) outlines IGT’s expectations regarding the workplace standards and business practices of its suppliers, along with their affiliates, subcontractors and others who are within their supply chain. The expectations contained in the Supplier Code are essential to IGT’s decisions to enter into or extend existing business relationships with its suppliers. For example, IGT expects suppliers to share its commitment to promoting and respecting human rights and equal opportunity in the workplace; hence suppliers must ensure that they do not participate in or benefit from any form of forced labor, and that they do not exploit children and young workers.

## **OUR EMPLOYEES**

At IGT, we value diversity and respect for all employees. IGT is actively engaged in building and sustaining a diverse and inclusive company that anticipates and meets the needs of the global customer base and the evolving demographics of the communities where our employees and customers are located. The Company is also committed to providing a work environment where everyone is treated with fairness, dignity, and respect without discrimination.

Recruitment checks are in place to minimize the risk of directly recruiting someone who is being forced to work or is being trafficked. IGT carefully monitors this area and believes that the policies and processes in place mean that the risk of forced or trafficked labor being employed directly by IGT and its employment agencies is very low. Background checks or other employment verifications are also carried out to safeguard against the risk of hiring someone under unfair conditions.

IGT is also committed to providing, maintaining and promoting a safe, healthy and productive work environment for all employees and ensuring compliance with all applicable environmental health and safety regulations, as well as developing a corporate culture that promotes physical and mental health and overall organizational well-being.

To ensure an appropriate level of understanding of the impact that slavery and human trafficking might have in its business and supply chains, all IGT employees are required to acknowledge the Code of Conduct as soon as they start working for the Company. IGT employees have also been required to undertake annual human rights training and certification of the Code of Conduct and the Human Rights Policy Statement.

## **SUPPLY CHAIN MANAGEMENT**

While IGT recognizes that sound business relations with suppliers are essential in order to maintain a dependable, competent source of supply for the uninterrupted flow of quality goods and services, suppliers are selected and evaluated beyond their economic solidity and business reliability. As set out in the Supplier Code, IGT expects its suppliers to fully comply with applicable laws and to adhere to internationally recognized environmental, social and corporate governance standards.

IGT uses a cross-functional internal team to select suppliers by conducting a risk-based due diligence (i.e., the amount of due diligence corresponds to the level of risk that the third party

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<sup>5</sup> The Supplier Code is available at [IGT's webpage](#).



poses to IGT), and follows an ISO 9001 certified quality management system to manage its direct material suppliers. IGT's vendor and purchase management processes in Italy typically require non-SA8000 certified potential suppliers to complete questionnaires that include questions on the supplier's stance on child labor, forced labor, freedom of association, discrimination, health and safety, and migrant worker practices, the results of which are then fed into the supplier onboarding process to ensure that areas of greater potential exposure are identified and assessed for risk.

IGT requires suppliers to acknowledge that they share the commitments listed in the Supplier Code and they are required to promptly inform IGT when any situation develops that causes them to operate in violation of the Supplier Code. In cases of non-compliance with the Supplier Code, the concerned supplier is committed to correcting the non-compliance within due time and to develop a remediation plan jointly with IGT. Non-compliance of the Supplier Code may lead to termination of the supply agreement, especially where severe or repeated.

During 2022, IGT continued its efforts in supply chain mapping based on risk factors related, for example, to the business, geography, and strategic importance of each considered supplier or category of suppliers, with a view to further integrate the assessed risks into IGT's Enterprise Risk Management program and ultimately enhance the definition and implementation of a responsible supply chain management process.

IGT typically carries out reviews on strategic direct material suppliers, generally with specific reference to those with higher financial risk who provide critical goods or services to IGT's business operations. Since 2020, IGT has integrated into these routine investigations the analysis of suppliers' environmental and social exposure, including but not limited to slavery and human trafficking, which may often be revealed by the violation of minimum working age standards, or by unfair wages, or by the impairment of freedom of association, or by forced labor, or by tolerance for discrimination and harassment practices. Supplier reviews have been conducted on-site but also virtually in 2022, to limit exposure to the COVID-19 pandemic, and are expected to continue in this fashion.

IGT recognizes the potential modern slavery risk associated with conflict minerals (i.e., tantalum, tin, tungsten and gold) which are found in most of IGT's land-based machine products, including but not limited to, slot machines, video poker machines, video lottery terminals, electronic or video bingo machines, lottery terminals, instant ticket vending machines, and ticket scanners. Due diligence underlying IGT's separate statutory disclosure to the U.S. Securities and Exchange Commission in its Conflict Minerals Report<sup>6</sup> contributes to the identification and prevention of modern slavery in the relevant supply chain.

## **2022 ACTIONS AND LOOKING AHEAD**

To summarize, the following key actions were taken by IGT in 2022 to strengthen its approach to modern slavery risk management:

- Employee training was expanded to human rights, including on the Human Rights Policy Statement and on anti-harassment and non-bullying principles, which will be repeated on an annual basis to help maintain a culture of respect within the organization.

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<sup>6</sup> The latest Conflict Minerals Report is available at [IGT's webpage](#).



- Development of a framework to identify, assess and prevent all possible risks related to human rights within IGT's operations was undertaken;
- The Supplier Code was updated in all the languages to include reporting concerns regarding conflict minerals non-compliance or violations to the Integrity Line;
- Supply chain mapping aimed at identifying potential risks continued as part of the Company's efforts to define and implement a responsible supply chain management process; and
- Set and defined targets in the IGT Sustainability Plan published in July 2022, which established the Company's sustainability priorities, including the promotion of human rights in its operations via provision of human rights training.

IGT aims to continue strengthening its approach to managing the risk of modern slavery within its business and supply chain and responding to changing risks by (i) driving awareness about modern slavery to its employees and engaging with them on these topics, and (ii) improving the business and supply chain risk assessment process, including addressing human rights risks. A number of activities have been planned or initiated/continued in this respect during 2023, including:

- Continuing with the development of a framework for implementing human rights assessment within IGT's operations;
- Defining a human rights due diligence process that will identify, prevent, mitigate and account for negative human rights impacts in the Company's own operations;
- Continuing with supply chain mapping;
- Focusing supplier due diligence and risk management on sustainability topics and implementing virtual risk assessment procedures, where appropriate, including through the implementation of an environmental, social and governance qualification questionnaire with human rights and modern slavery criteria;
- Defining an ISO 20400 inspired sustainable procurement process that provides a strategic framework for an organization to procure responsibly, including guiding principles such as accountability, respect for human rights and ethical behavior;
- Implementing a Global Sustainable Procurement Policy which expressly rejects slavery and the correlated use of forced and child labor across the supply chain; and
- Participating in the United Nations Global Compact Business and Human Rights Accelerator program which aims to support the global business community in its journey to respect human rights.



## KEY PERFORMANCE INDICATORS – 2022

|                                                                                                                                                     |                                                                                                                                                                                                                                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b><i>Incidents or cases concerning modern slavery, including in the supply chain, reported via IGT's Integrity Line or other similar tools</i></b> | <ul style="list-style-type: none"> <li>• None identified; No clues detected that might suggest an increase in the likelihood or severity of modern slavery risks in IGT's business and supply chain, which remain both low</li> </ul> |
| <b><i>Percentage of employees who completed the Code of Conduct certification</i></b>                                                               | <ul style="list-style-type: none"> <li>• 100%</li> </ul>                                                                                                                                                                              |
| <b><i>Percentage of employees who completed the Human Rights training and the Human Rights Policy Statement certification</i></b>                   | <ul style="list-style-type: none"> <li>• 97.14%</li> </ul>                                                                                                                                                                            |
| <b><i>Percentage of suppliers who received the Supplier Code</i></b>                                                                                | <ul style="list-style-type: none"> <li>• Approximately 53% of existing suppliers received the Supplier Code</li> <li>• 100% of new suppliers received the Supplier Code</li> </ul>                                                    |
| <b><i>Number of cases of material non-compliance of the Supplier Code</i></b>                                                                       | <ul style="list-style-type: none"> <li>• None identified</li> </ul>                                                                                                                                                                   |

## APPROVAL

This statement is made by International Game Technology PLC in accordance with section 54 of the Modern Slavery Act 2015 and has been reviewed and approved by the board of directors of International Game Technology PLC on 5 May 2023.

**Marco Saia**

Executive Chair

for and on behalf of International Game Technology PLC

Date: 10/05/ 2023

<sup>i</sup> This Modern Slavery Statement contains certain statements regarding IGT's targets, goals, commitments, initiatives and objectives, which are based on current beliefs of the management of IGT as well as expectations of, assumptions made by, and information currently available to, management and may include standards of measurement and performance that are either developing or are based on assumptions. The expectations in these statements are subject to various risks, uncertainties, changes in circumstances and other factors, many of which are outside IGT's control. Although we assume the expectations in these statements are realistic, we can neither guarantee nor promise they will be realized or, even if substantially realized, that those results will have the expected consequences and effects. Therefore, you should not place undue reliance on such statements.