



Gifts and Entertainment Policy

Owner: Compliance Department

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1. Purpose and Scope

This Policy sets out guidelines and limits on the exchange of gifts, meals, and entertainment from or to anyone with whom Light & Wonder, Inc. (Light & Wonder or L&W) has a current or potential business relationship. In applying this Policy, you should be mindful of the many situations in which our customers are governmental agencies and employees and that special rules (set forth below in Section III) apply with respect to government customers.

Light & Wonder competes for and earns business loyalty through the quality of its personnel, products, and services, not with gifts or entertainment. Additionally, when making purchasing decisions for Light & Wonder, you are expected to be impartial and make decisions based upon the best interests of Light & Wonder.

Carefully read this Policy, the Light & Wonder Code of Business Conduct (the "Code"), and the Light & Wonder Anti-Bribery Policy and ensure your actions with respect to the giving and receipt of gifts, meals and entertainment comply with this Policy and the Code. All requests made to the Chief Compliance Officer must be entered through the Company's Gift and Charity Tracker found here: <http://laswisprod01.lnw.com/GiftCharity>.

Failure to comply with this Policy may subject you to disciplinary action up to and including termination of your employment.



2. Scope

This Gifts and Entertainment Policy (the “Policy”) applies globally to all employees of Light & Wonder, Inc. and its subsidiaries (together, “Light & Wonder” or the “Company”), and any representatives or consultants engaged by or working on behalf of Light & Wonder (for the purpose of this Policy, referred to as “employees”).

3. Definitions

“Gift” – A gift is anything of value, including cash, gift certificates, favors, discounts, merchandise, and tickets for events where the giver of the tickets will not join the gift recipient at the event. Gifts also include services and promises to do something in the future, that you—or anyone in your family or household or with whom you have a close personal relationship, or anyone acting at your direction—either give or receive. It does not matter whether the gift was purchased, in whole or in part, with your money, or the Company’s or even a third party’s funds.

“Entertainment” – Entertainment includes travel, hotel accommodations, meals, and cultural or sporting events that you attend with a customer, supplier, or business provider. Unless you attend the event with the customer, supplier or business provider, the tickets are not entertainment, but are instead gifts and subject to the gift restrictions in this Policy and in the Code. The appropriateness of a particular type of entertainment, of course, depends upon both the reasonableness of the expense and on the type of activity involved. Styles of entertainment that are likely to compromise Light & Wonder’ reputation as a non-discriminatory company are always inappropriate. For instance, adult entertainment venues are never appropriate.

“Public Officials” – a public or governmental official or employee, including candidates for public office, officials of political parties, or employees of foreign government-controlled organizations

4. Requirements

I. Gifts

NOTE: SPECIAL GUIDELINES FOR GOVERNMENT CUSTOMERS ARE SET FORTH IN SECTION III

- A. General Policy on Giving Gifts. No employee of Light & Wonder shall make or offer any gift to any existing or potential customer, supplier, or competitor, or its agent, employee, or consultant that is or could be construed as an attempt to influence the business decision or conduct or to obtain or retain the business of that or any other person. You may not give a gift if you are involved in any stage of a procurement, contracting or sales process with a customer or potential customer.

In addition to following the limitations outlined in this Policy, prior to offering a gift, you should familiarize yourself with the standards exercised by your customer or potential customer so that you do not compromise the customer’s adherence to its own internal standards.

- B. Exceptions for Giving Gifts. Occasional and customary social and business courtesies are permitted. Gifts may be appropriate if they are unsolicited, business-related, not cash or usable as cash (for example, giving a gift certificate or gift card is not appropriate), and are of nominal value (or carry a logo).



- i. Business gifts that are neither lavish nor extravagant and that do not violate the recipient's own policies or applicable laws may be appropriate. However, you must obtain your supervisor's approval before giving any business gift. In addition, you must receive written permission from the Chief Executive of your division or another executive officer of Light & Wonder Corporation to give an individual gift if the value exceeds \$100. You must also receive written permission from the Chief Compliance Officer for any business gifts to the same recipient that exceed \$250 in any twelve month period. The Chief Compliance Officer will consult with the Chief Legal Officer or the Chief Legal Officer's designee as needed regarding such gifts. You should aggregate the value of gifts you give with gifts made by other Company employees to the same individual, to the extent you are aware that other Company employees have made gifts to that individual.
- ii. When in doubt whether a gift is appropriate, confer with the Chief Compliance Officer or the Chief Legal Officer prior to giving the gift.

You must get your supervisor's approval before giving a gift. Also, (i) individual gifts over \$100 and (ii) multiple gifts exceeding \$250 in value in a twelve month period require special approval.

- C. General Policy on Receiving Gifts. The receipt of gratuities - such as gifts of more than nominal value, money, gift certificates, gift cards, loans, vacations, airline tickets or hotel accommodations - is prohibited. Furthermore, no employee shall accept any gift, business courtesy, service, or other benefit from any existing or potential customer, supplier, or competitor where there may be an appearance that the giver expects to influence the employee's business decisions or conduct. If any person offers you a gift in exchange for business or any type of service, you must decline the offer and contact the Chief Compliance Officer or the Chief Legal Officer immediately.

You must receive written permission from the Chief Executive of your division or another executive officer of Light & Wonder Corporation to accept any individual gift if the value exceeds \$100. Any business gifts worth more than \$250 in any twelve month period from the same company (regardless of whether the gifts are given by one individual or multiple individuals at a company) are presumed to be excessive. Employees should politely refuse or return any gifts that exceed these guidelines with an explanation that Light & Wonder standards do not permit you to accept such gifts.

If you believe refusing or returning a gift would insult or embarrass the giver, or if you are uncertain whether a gift may be accepted, report the gift to the Chief Compliance Officer for a determination. The Chief Compliance Officer will consult with the Chief Legal Officer or the Chief Legal Officer's designee as needed regarding such gifts.

All employees that engage in, or influence, the selection of suppliers of goods or services should closely review Section IV. of this Policy as it contains special rules that apply to such employees.



- D. Discounts. Discounts or other preferential treatment from business providers are acceptable only if they are publicized to all employees and widely available to all Light & Wonder employees.

II. Entertainment

NOTE: SPECIAL GUIDELINES FOR GOVERNMENT CUSTOMERS ARE SET FORTH IN SECTION III

- A. General Policy on Meals and Entertainment. As part of the performance of an employee's responsibilities, it may be appropriate as a generally accepted business practice to pay for or be the recipient of reasonable meals, refreshments, and entertainment in conjunction with business discussions, as long as the occasions are not frequent with respect to the same recipient or giver and are neither lavish nor extravagant. Expenses incurred during, or to prevent interruption of, business discussions in settings conducive to such discussions are generally permitted. However, you may not provide or accept such meals or other amenities when prohibited by law or contract or when the employee has, or should have, any reason to believe that the offer is made with the intent to improperly influence the employee in the performance of his or her responsibilities for the Company. In addition to following the limitations outlined in this Policy, prior to providing meals and entertainment, you should familiarize yourself with the standards exercised by your customer or potential customer so that you do not compromise the customer's adherence to its own internal standards. Also, remember there are special rules for government customers explained in more detail in Section III.

Remember, you may never offer or accept extravagant or lavish meals or entertainment.

You may not solicit or even suggest entertainment, such as sporting events, social dinner meetings or social events, as a condition for a person or organization to do business with the Company. In addition, you should never offer entertainment as a means of influencing another person's business decision. Appropriateness may come down to judgment, but we should always consider how the situation would appear to the outside world when exercising our judgment in this area. When in doubt, confer with the Chief Legal Officer or Chief Compliance Officer first.

Additionally, all employees that engage in, or influence, the selection of suppliers of goods or services should closely review Section IV. of this Policy as it contains special rules that apply to such employees.

III. Special Rules for Government Customers

If a gift involves a public or governmental official or employee, including candidates for public office, officials of political parties or employees of foreign government controlled organizations (collectively, "Public Officials"), you must take particular care to follow the policies and procedures outlined here. The laws of many jurisdictions, including federal law, the law of all 50 states and many international jurisdictions, make it a crime to obtain business by giving or offering a thing of



value (bribe or kickback) to the purchasing decision-maker. These laws carry severe civil and even criminal consequences for the individual and the Company. It is our policy not only to obey the law but to avoid even the appearance of a conflict of interest.

In meeting this policy, you should be aware that many of these laws forbid giving business gratuities to purchasing agents or those involved in the bidding (request for proposal) process. This means that even such things as non-lavish meals, entertainment, sporting events, and golfing can be considered creating a conflict of interests or even treated as a bribe in some circumstances. Meetings with governmental officials related to seeking government contracts are therefore best held at their offices unless they designate an alternative location for a business-related purpose.

Gifts, meals or entertainment for any Public Official, whether in the U.S. or a foreign jurisdiction, may not be made without written prior approval from the Chief Compliance Officer via e-mail. Furthermore, you may never give cash, directly or indirectly, to a Public Official.

IV. Gifts and Entertainment Policy for Employees that Engage in, or Influence, the Selection of Suppliers of Goods or Services

It is particularly important that Light & Wonder employees involved in the decision-making process for the selection of suppliers and vendors, including, but not limited to, employees in the Procurement, Purchasing, Engineering, Advanced R&D, and Product Management departments, remain impartial and avoid any improper influence. The following rules apply to all employees involved in the selection of suppliers or vendors:

- Employees may not accept any gifts from present or potential suppliers or vendors, regardless of value. Employees should politely refuse or return any gifts with an explanation that Light & Wonder standards do not permit you to accept such gifts.
- Business meals, beverages or entertainment paid for by a supplier or vendor are not permitted. However, certain vendors may offer educational opportunities that involve meals, travel and/or hotel stays; please discuss these with your supervisor. If your supervisor approves, the approval of your second level manager and the Chief Compliance Officer are also necessary prior to accepting.

5. Compliance

V. Reporting

- A. In addition to the prior approval requirement outlined above in Section III, you must report any meal, refreshment, gift or entertainment provided to a Public Official to the Chief Compliance Officer by e-mail regardless of the amount.
- B. Meals, refreshments, gifts and entertainment provided to non-Public Officials are subject to audit to ensure compliance with this Policy.



- C. Reimbursement for expenditures for meals, refreshments, entertainment, and gifts must be documented and approved in accordance with the Company’s Global Travel & Expense policy. Light & Wonder will only reimburse expenditures that are fully and properly supported by third-party invoices or receipts. With the exception of normal and customary petty cash requirements, cash transactions in connection with the Company’s business are to be avoided.
- D. If you discover what you believe might be a violation of this Policy, you are required to report such violation to the Chief Legal Officer and Chief Compliance Officer. Additionally, you may report violations through the Company’s EthicsPoint hotline at 1-888-475-9507 or log on to <https://LnW.ethicspoint.com>.
- E. In addition, federal and certain states’ laws require under the Anti-Kickback Act (or comparable state laws) that private businesses report kickback offers or requests of which we become aware - whether by the contracting official, fellow employees, sub or prime contractors, and even competitors. **IF YOU BECOME AWARE OF SUCH A SITUATION, CALL THE CHIEF COMPLIANCE OFFICER OR THE CHIEF LEGAL OFFICER IMMEDIATELY.**

QUESTIONS

Questions regarding whether a particular payment, gift or form of entertainment violates this Policy should be directed to the Chief Compliance Officer or the Chief Legal Officer. If you have any other questions concerning this Policy, you should also contact the Chief Legal Officer or Chief Compliance Officer.

6. Revision History

Version	Date	Modifications	Changed by:
1.0	08/02/2017	First approved document	Paige Younkins
2.0	12/7/2020	Reformatted to new template	Regulatory Compliance
3.0	11/15/2022	Updated for Rebranding to Light & Wonder	Regulatory Compliance
4.0	09/12/2023	Updated the Gift & Charity Tracker URL link	Regulatory Compliance