

## Scope

International Game Technology PLC and its subsidiaries (collectively, “IGT” 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 IGT 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.

## Policy

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, IGT 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.cahrastlist.net](http://www.cahrastlist.net).

---

<sup>1</sup> “Covered Products” means the Company’s manufactured or contracted for manufacture 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).

<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.

## **Responsibilities:**

### *IGT Conflict Minerals Diligence Program and Due Diligence Process*

IGT 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"), 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.

IGT 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. IGT 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, IGT'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;
- 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

---

<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.

“CMRT”<sup>7</sup>(see Exhibit A) 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.*

IGT 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.

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

On an annual basis, IGT 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, IGT produces the Company’s Conflict Mineral Report (the “Report”), and the Report is included as an exhibit the Form SD filing.

#### *Escalation Procedure for Non-Conformance*

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

#### *IGT Integrity Line*

Employees who have concerns regarding non-compliance with this Policy and/or violations of law related to Conflict Minerals may contact the IGT Integrity Line to report such incidents. Maintained by an independent provider, the IGT 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 at: <https://www.igt.com/explore-igt/about-igt/compliance>.

## **Ownership**

Senior Manager – Supplier Diversity & ESG

---

<sup>7</sup> The CMRT is a standardized reporting template developed by the Responsible Minerals Initiative (founded by members of the EICC and GeSI) that facilitates: (i) the transfer of information through the supply chain regarding mineral country of origin, and smelters and refiners being utilized; and (ii) disclosure and communication of information regarding smelters that provide minerals to a company’s supply chain.

Title: IGT Conflict Minerals Policy

Revision: A

Effective Date: April 11<sup>th</sup>, 2023

DC-5060716

Page 4 of 10

**Revision History**

Revision	Date	Description of changes	Requested By
A	04/11/2023	Revision A released	Steve Young

**EXHIBIT A**

**Conflict Minerals Reporting Template**

<b><u>Company Name (*):</u></b>	-
<b><u>Declaration Scope or Class (*):</u></b>	-
<b><u>Description of Scope:</u></b>	-
<b><u>Company Unique ID:</u></b>	-
<b><u>Company Unique ID Authority:</u></b>	-
<b><u>Address:</u></b>	-
<b><u>Contact Name (*):</u></b>	-
<b><u>Email – Contact (*):</u></b>	-
<b><u>Phone – Contact (*):</u></b>	-
<b><u>Authorizer (*):</u></b>	-
<b><u>Title - Authorizer:</u></b>	-
<b><u>Email - Authorizer (*):</u></b>	-
<b><u>Phone - Authorizer:</u></b>	-
<b><u>Effective Date (*):</u></b>	-

**Answer the following questions 1 - 8 based on the declaration scope indicated above**

**1) Is any 3TG intentionally added or used in the product(s) or in the production process? (\*)**

	<b><u>Answer</u></b>	<b><u>Comments</u></b>
<b><u>Tantalum (*)</u></b>	-	-
<b><u>Tin (*)</u></b>	-	-
<b><u>Gold (*)</u></b>	-	-
<b><u>Tungsten (*)</u></b>	-	-

**2) Does any 3TG remain in the product(s)? (\*)**

	<b><u>Answer</u></b>	<b><u>Comments</u></b>
<b><u>Tantalum (*)</u></b>	-	-
<b><u>Tin (*)</u></b>	-	-

<u>Gold (*)</u>	-	-
<u>Tungsten (*)</u>	-	-

**3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (\*)**

	<u>Answer</u>	<u>Comments</u>
<u>Tantalum (*)</u>	-	-
<u>Tin (*)</u>	-	-
<u>Gold (*)</u>	-	-
<u>Tungsten (*)</u>	-	-

**4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (\*)**

	<u>Answer</u>	<u>Comments</u>
<u>Tantalum (*)</u>	-	-
<u>Tin (*)</u>	-	-
<u>Gold (*)</u>	-	-
<u>Tungsten (*)</u>	-	-

**5) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (\*)**

	<u>Answer</u>	<u>Comments</u>
<u>Tantalum (*)</u>	-	-
<u>Tin (*)</u>	-	-
<u>Gold (*)</u>	-	-
<u>Tungsten (*)</u>	-	-

**6) What percentage of relevant suppliers have provided a response to your supply chain survey? (\*)**

	<u>Answer</u>	<u>Comments</u>
--	---------------	-----------------

Title: IGT Conflict Minerals Policy

Revision: A

Effective Date: April 11<sup>th</sup>, 2023

DC-5060716

Page 7 of 10

<b><u>Tantalum (*)</u></b>	-	-
<b><u>Tin (*)</u></b>	-	-
<b><u>Gold (*)</u></b>	-	-
<b><u>Tungsten (*)</u></b>	-	-

**7) Have you identified all of the smelters supplying the 3TG to your supply chain? (\*)**

<b><u>Answer</u></b>	<b><u>Comments</u></b>
<b><u>Tantalum (*)</u></b>	-
<b><u>Tin (*)</u></b>	-
<b><u>Gold (*)</u></b>	-
<b><u>Tungsten (*)</u></b>	-

**8) Has all applicable smelter information received by your company been reported in this declaration? (\*)**

<b><u>Answer</u></b>	<b><u>Comments</u></b>
<b><u>Tantalum (*)</u></b>	-
<b><u>Tin (*)</u></b>	-
<b><u>Gold (*)</u></b>	-
<b><u>Tungsten (*)</u></b>	-

**Answer the Following Questions at a Company Level**

<b><u>Question</u></b>	<b><u>Answer</u></b>	<b><u>Comments</u></b>
<b><u>A. Have you established a responsible minerals sourcing policy? (*)</u></b>	-	-
<b><u>B. Is your responsible minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.) (*)</u></b>	-	-

<p><u>C. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*)</u></p>	-	-
<p><u>D. Have you implemented due diligence measures for responsible sourcing? (*)</u></p>	-	-
<p><u>E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)</u></p>	-	-
<p><u>F. Do you review due diligence information received from your suppliers against your company's expectations? (*)</u></p>	-	-
<p><u>G. Does your review process include corrective action management? (*)</u></p>	-	-
<p><u>H. Is your company required to file an annual conflict minerals disclosure? (*)</u></p>	-	-



## **EXHIBIT B**

### **Communication and Escalation Procedure for Supplier Noncompliance with the Conflict Minerals Policy and Supplier Code of Conduct**

#### **Purpose**

This Communication and Escalation Procedure for Supplier Non-compliance with the Conflict Minerals Policy (the “Policy”) and Supplier Code of Conduct (the “Supplier Code”) defines the Company’s actions in the event a Supplier has been deemed non-compliant for its: (i) failure to submit a Conflict Minerals Reporting Template (the “CMRT”); or (ii) use of a non-compliant smelter to supply Conflict Minerals to IGT.

#### **Responsibilities**

Supplier Management  
Quality Engineering

#### **Scope**

Escalation procedure for Supplier deemed non-compliant with the Policy and/or Code by Quality Engineering.

#### **Procedure**

**Upon notification from Quality Engineering that a Supplier has been found non-compliant due to its failure to submit a CMRT, Supplier Management will undertake the following measures:**

- 1) Contact the Supplier by email to reinforce compliance with the CMRT request in accordance with the Code.
  - Quality Engineering will be copied on the communication.
- 2) If the Supplier still has not responded to the request after 15 working days, Supplier Management will escalate via email to the highest level in the Operations department.
  - Quality Engineering will be copied on the communication.
  - Inform Supplier that the Company will offer training to complete the required CMRT.
- 3) If the Supplier still has not responded to the request after an additional 15 working days, Supplier Management will escalate via phone call to the highest level of the Suppliers known operations.
  - Inform Supplier that IGT will offer training to complete the required CMRT.
  - If the Supplier still chooses not to comply with the request, Supplier Management will report the non-compliant Supplier to Internal Audit via Quality Engineering.

**Upon notification from Quality Engineering that a Supplier has been found non-compliant due to its use of an uncertified smelter, Supplier Management will undertake the following measures:**

- 1) Contact the Supplier by email to confirm the accuracy of the information submitted within the CMRT.
  - Inform the Supplier of their connection to an uncertified smelter.
  - Offer the Supplier 10 working days to confirm the Company's understanding.
  - Quality Engineering will be copied on the communication.
- 2) Should the Supplier confirm the use of a non-certified smelter, Supplier Management will advise the Supplier via email that the use of a non-certified smelter violates our Code.
- 3) The Supplier will be asked to submit a written resourcing plan (the "Plan") to Supplier Management to remediate the Code violation and resource Conflict Minerals from a certified smelter.
  - The Supplier will be provided 60 calendar days to submit their Plan.
  - The Plan will be reviewed with Supplier Management and Quality Engineering. If deemed acceptable, Supplier Management and Quality Engineering will set up a three-month review with the Supplier to audit their remediation progress.
  - The Plan will be submitted to Quality Engineering for archiving.

**Noncompliance action**

If the Supplier chooses not to comply with the Code, Supplier Management will begin resourcing activity to eliminate the non-conforming Supplier, if possible, no more than 6 months post conclusion of non-conformance.