

Integrated report 2022



codere

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Chairman's letter



01

Dear readers:

2022 was a year of continued recovery of the Group, which was stalled by the continuation of COVID closures and restrictions until May 1st. This, further exacerbated by macroeconomic issues and cost of living rises across our territories.

Our revenue levels have continued to improve during the year, and have approximated to pre-COVID levels but, we still have much to do.

Codere Online has had a good year, growing its revenue and customer base in its key markets of Spain and Mexico.

The year has been a period of consolidation and preparation for further increased efficiencies, improved capital deployment and investment.

Throughout the year, we reinforced several key management positions, who continue to support us in our journey to recovery.

As always, we owe a great deal of gratitude to our [11,000] colleagues, who have ensured we continue to move towards, and the patience and continued support of our share and bondholders.



Sincerely yours,

Christopher Bell
Non-Executive Chairman of Codere Group



About us



02

02.1 Codere at a glance

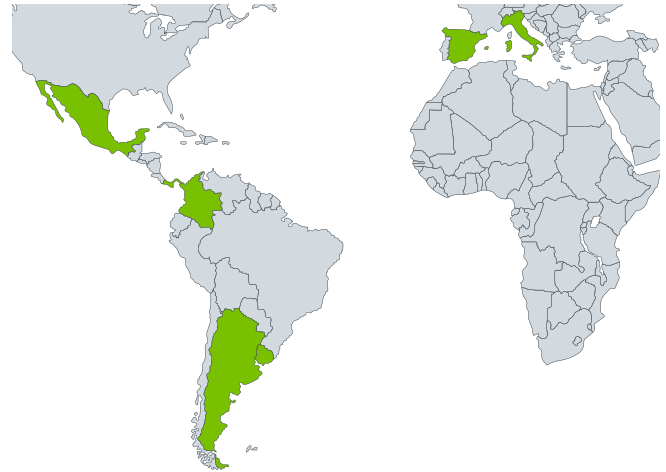
Codere, international leader in the gaming industry

Codere is a Spanish multinational company engaging in entertainment. International leader in the gaming and sports betting industry, it is present in seven countries in Europe (Spain and Italy) and Latin America (Argentina, Uruguay, Mexico, Colombia and Panama) and has over four decades of experience.

The group operates gaming machines, bingo seats and sports betting terminals, with an omnichannel offer, through both the online channel and retail points, including gaming halls, arcades, betting halls and racetracks.

Codere, one of the leading companies in the entertainment and leisure industry and holds a privileged position in the main business lines and geographical areas in which it operates:

- It is the leading enterprise of the industry in Latin America.
- It is one of the main retail sports betting and AWP machine operators in Spain.
- It is the first online gaming operator in Latin America to be listed on the Nasdaq, through Codere Online.
- It has a very wide customer base to which it targets its omnichannel offer.
- It has a solid operating performance and growth trend.



Its leadership is due, largely, to the **solid positioning of its brand** and to the development of its marks of identity, such as its commitment to **technological innovation** and **excellence in its treatment of customers**¹.

At the 2022 year end, the organization had **11,046 employees** committed to affording customers an excellent service providing them with experiences connecting with their entertainment motivations, through the wide offer of the company. The result of their commitment is the growth of its customer base now reaching **7,500,000 users**.

In its firm commitment to the development of a gaming offer with all safeguards, Codere performs its business with absolute transparency, responsibility and commitment to its stakeholders, implementing the best responsible gaming practices for the protection of vulnerable groups and a sustainable industry.

The main figures of Codere's business lines and transactions at December 31, 2022, are shown below:

¹ Codere's leadership strategy is further developed in Chapter 3.1 *Back to normal*



Business lines



MAIN FIGURES

11,046
professionals

1,314.8M€
of operating revenue

629.6M€
paid in taxes

46
nationalities

231.9M€
of adjusted EBITDA

1,413.69M€
of economic value distributed
to stakeholders⁴

² Sports betting machines: figures reflect self-service terminals (SSTs).

³ Betting shops: includes sports books co-located within Codere gaming halls and other Codere operated sports betting shops.v

⁴ The economic value distributed to stakeholders includes payment of salaries to employees, purchases and contracts with suppliers, payment of dividends to investors, payment of interest to financial institutions and payment of fees and taxes to the public authorities.



Codere Milestones in 2022⁵

2022 has been a key year for the company which, after its financial restructuring and the flotation of Codere Online on the Nasdaq, commenced a new stage, as **Nueva Codere**, with the essence of more than four decades of history but with a renewed structure.

This has been a challenging year due to the erosion of the business impacted by the omicron variant and its effects on the in-person gaming business and to the war in Ukraine with its impact on the macroeconomy and the industry (with general price increases, particularly for energy, and the threat of recession hanging over Europe and the USA, with unavoidable consequences for Mexico).

These events have led the company to adopt a **prudent expenditure and investments strategy** and to focus its efforts on the most profitable projects. Codere has nonetheless known how to navigate the complex scenario, moving forward **its recovery** after the pandemic, with a favorable evolution in all markets, particularly in the online business. In addition, Codere has maintained its leading position, maintaining its business portfolio intact and even improving its turnover in some of its geographical areas.

The company has also continued its transformation, **reinforcing its brand by maintaining its sports sponsors** (Real Madrid C.F., Club de Fútbol Monterrey Rayados and Club Atlético River Plate); becoming one of the hundred brands⁶ most acknowledged this year in Spain and one of the 500 companies most renowned in Mexico; **digitalizing its business** (implementation of teleworking system, progress in cybersecurity, salesforce, Codere Personas Digital (Cornerstone), etc.); **intensifying its Corporate Social Responsibility⁷** (SAGSE Latam award, social initiatives, contribution



via taxes, etc.); and, improving **employee experience** (CSR for employees, commitment to talent attraction and retention) **and customer experience** (reinforcement of the omnichannel strategy, Operating Excellence Model, etc.).

Codere thus ends the year approaching a position from which to undertake a new stage of growth.

⁵ Codere's main news and milestones in 2022 are explained in further depth in Chapter 3.1 Back to normal.

⁶ Codere reaches the 61st position in the 'Brand Finance España 2022' ranking and comes among the most valued of the Expansión ranking ('Las 500 empresas más importantes de México').

⁷ The initiatives taken in the CSR context and employee experience is explained further in depth in Chapter 5. *Our contribution to the company.*



02.2 Purpose and presence

02.2.1 Purpose, mission and values **Values**

Codere's transformation process has reinforced its essence and emphasized those aspects of its DNA that form part of the group from its start and have contributed to its success and leadership. In this way, the company reaffirms its commitment to perform its activities with operating excellence, efficiency, social responsibility, integrity and transparency and innovation, features that inspire the purpose, vision and values of the group.

Purpose

To build up emotions in those who chose an entertainment experience based on betting in a safe environment. To be betting, emotion, fun, excitement, closeness, safety, trust and social commitment!

Vision

- To be leaders, flagships and trending setters.
- To shed light on our industry, dignifying it.
- To watch our people's eyes shine, affording them growth and development opportunities.
- To exceed our shareholders' and investors' expectations.
- To develop our people and the local communities where the group operates.
- To hold suitable and transparent relations with the authorities.
- To promote sustainability.

Our values represent the commitment made each of the members of the organization and are constant and transversal to any function and market. The group considers it a priority to permeate them and have them remain as part of the DNA of the group throughout the changes, through their internal dissemination and exemplification.

1. Customer-centricity

Placing the customer in the center of Codere's strategy means putting oneself in the customers' place and listening to, understanding and meeting their needs by affording them the best experience. To that end, it is essential to know their tastes and interests, in order to design new products and services, and to offer them a top quality, responsible service with all safeguards.

2. Integrity and transparency

This value means working committedly and responsibly with all of the stakeholders, ensuring that each one of the people in the group or who interact with it is respected. To implement this common framework to guide the conduct of Codere's members, in 2007, its Board of Directors approved its first *Code of Ethics and Integrity*, updated in 2021.

Codere also puts the spotlight on strict compliance with the rules and best practices, meeting top quality standards and reporting them both internally and to the market.



The *Corporate Social Responsibility Policy* and this *Integrated Report* are examples of efficient, systematic and transparent tools to report the company's actions in the sustainable development and management context.

3. Team work committed to excellence

This value is realized through the commitment of the organization's teams to work with integrity, quality and efficiency, and their ability to raise trust in the various publics of the group through a work well done. The company has teams capable of providing a fast and responsible response to the environment, adapting to the various situations meeting the acquired commitments.

4. Innovating attitude levered by technology

This value implies observing the environment, analyzing it and moving along with its evolution creatively, offering the best response to the market expectations. Codere promotes a cultural transformation to encourage a deep, simplified and positive view of things.

The company has known how to adapt to teleworking and keep its teams united despite the distance. In addition, customers have changed their demand for entertainment, the organization now focusing on affording the best access to its omnichannel offer.

5. Focus on efficiency to ensure our feasibility

Efficiency is one of the essential ingredients to ensure Codere's feasibility and means making the most of the time, resources and capabilities of the company to achieve the best quality in the service it offers its customers.

To promote its values, in 2021, the **Codere DNA Global Specialty Center** was created, responsible for safeguarding the company's values and ensuring that they reach the entire organization. To that end, several actions have been taken including:

- Internal communication: the "**ValorES Codere. Our DNA**" campaign was launched through the various corporate communication channels to promote and enhance each one of our values with audiovisual content developing each concept in depth, for them to be understood, knowing the behaviors to be adopted and avoided to reinforce them. This campaign continues in place, with its own web section in the group's corporate newsletter, Codere Actualidad.
- Design and implementation of programs to promote the leadership and development of collaborators, in line with Codere's values, such as the **Leadership Model, the Management Model and Avanza+**⁸.

⁸ The features of these programs are further developed in Chapter 5.3.3 *Committed to Talent*



02.2.2 Worldwide presence



Spain

9,131 machines 1,064 bingo seats
 6,463 betting terminals 3 gaming halls
 6,182 bars 934 arcades
 28 sports betting shops **Online**

Panama

2,278 machines 103 betting terminals
 11 gaming halls 12 sports betting points
 428 gaming tables 1 racetrack **Online**

Mexico

14,695 machines 692 bingo seats
 577 betting terminals 366 bingo tables
 88 gaming halls 63 sports betting shops 1
 racetrack **Online**

Colombia

3,675 machines 458 betting terminals
 12 gaming halls 102 gaming tables
 105 arcades 46 sports betting points
Online

Argentina

6,805 machines 11,692 bingo seats
 13 gaming halls **Online** (en CABA)

Uruguay

2,209 machines 25 betting terminals
 6 gaming halls 78 gaming tables
 2 racetracks **Online****

Italy

7,616 machines 3,123 bingo seats
 10 gaming halls 1,926 bars Gaming terminal
 network concession **Online***

Note: Betting terminals: The numbers show the betting terminals (SSTs); Betting shops: includes betting books in gaming halls of Codere or betting halls managed by Codere).

* exit December 30, 2022.

**for horse racing bets.



The company opts for geographical diversification and a product portfolio distributed throughout all its locations. As shown in the table above, Codere operates gaming terminals, gaming halls, arcades, sports betting, racetracks and online gaming.

Argentina, Mexico, and Italy are the main markets in 2022 and represent as a whole 65.66% of the group's turnover and 69.46% of its Adjusted EBITDA (Post IFRS 16).

In respect of the results of the year, 2022 is consolidated as the year in which Codere's revenues are back to normal. Despite the impact of the COVID-19, the group, after it completed its financial restructuring⁹, has maintained its portfolio of assets and all its markets are evolving favourably, close to 2019 levels.

Also, the agreement made to merge the online gaming subsidiary of the group with SPAC DD3 Acquisition Corp. II, giving rise to the creation of Codere Online, the first online gaming operator in Latin America to be listed on the Nasdaq (CDRO), after December 1, 2021¹⁰, allowed the group to continue the strong development of its online offer throughout the year.

As a result, Codere obtained adjusted EBITDA of 231.9 million euros, representing a 133.2% increase in respect of 2021. All the markets contributed to the positive generation of EBITDA, although the business units with a higher interannual increase of revenues are Argentina and Mexico.

Financial figures			
	Group turnover (%)	Adjusted EBITDA (Post IFRS 16)	Adjusted EBITDA variation 2022-2021
Spain	13.15%	18.11%	18%
Mexico	17.72%	24.75%	70.9%
Argentina	26.38%	34.45%	N.A.
Italy	21.55%	10.26%	N.A.
Panama	5.47%	5.74%	50.8%
Colombia	1.58%	2.41%	17.9%
Uruguay	5.32%	9.06%	N.A.
Online	8.83%	3.36%	N.A.
Corporate	N.A.	(8.15)%	(25.7)%
Total	100%	100%	134.5%

⁹ The group's Financial Restructuring Process is further developed in Chapter 3.1 *Back to normal*.

¹⁰ The Codere Online Project is developed further in Chapter 3.1 *Back to normal*.



A continuación, detallamos las principales características del negocio de Codere y su operativa en cada uno de sus mercados:

Spain

Spain is the origin of Codere's business and is consolidated as its reference market. The company is the market leader in retail sports betting and slot machines and the second largest machine operator in the country. The group is present in all regions and its presence online is also to be noted. In addition, among other halls, the company manages the Canoe Bingo Hall, the largest in Spain and one of the most important in continental Europe.

Codere's business in Spain consists of the traditional machine segment, sports betting, online gaming and gaming halls -integrating traditional machines into other products such as electronic roulette and bingo or sports betting terminals-.

In 2021, the company managed to extend its sports betting and other online gaming licenses for ten years and these licenses will now expire in 2032.

Mexico

From the start of its operations in Mexico, in 1998, Codere has been consolidated as the major operator and leading company in the private gaming industry in Mexico. The company's main activity in Mexico is the development and management of gaming halls at which machines and, in some cases, bingo and sports betting seats, are operated, in addition to the incipient online activity in the country.

The business in Mexico is performed mainly through AMH, in which the company holds 84.8%, and Codere Mexico, 100% owned. Through the subsidiaries of each of these companies, Codere holds 135 permits to operate gaming halls, expiring between 2027 and 2048.

Codere also holds a concession, renewed in 2018, to operate Las Americas, a family entertainment complex in Mexico City, including Las Americas Racetrack, Granja Las Americas family park and the Citibanamex Center, the largest convention facility in Latin America (which, under an outsourcing agreement executed on June 1, 2013, renewed in 2019, is operated by CIE, Compañía Interamericana de Entretenimiento).

Argentina

Codere started its business in Argentina in 1992 and is currently the leading operator in the private gaming industry in the country and the major gaming hall operator in Buenos Aires province.

The company performs its business in Argentina under bingo licenses (one per hall), expiring in two cycles; the first between 2021 (renewed in 2022 for a 15-year period) and 2024 (eight licenses); and, the second between 2028 and 2029 (five licenses). In addition to traditional bingo, slot machines are also operated at these halls. Codere's gaming halls are located in the Buenos Aires conurbation, in Great Buenos Aires, in Mar del Plata, a tourist city, and La Plata, capital of the province.

Since 2021, the online sports betting and casino games in the City of Buenos Aires must be added to the retail gaming halls and machines portfolio.



Italia

Codere started its business in Italy in 2001 in the bingo sector and is one of the leading companies in this sector, with ten bingo halls. The company currently manages a major gaming terminal interconnection network, Codere Network, operating more than 7,600 machines (AVP AWP and VLT) through machine management companies that it controls.

In 2021, the company undertook the restructuring of its business to the northwest of the country in the machine management market, simplifying its structure to take advantage of the existing operating, administrative and corporate synergies.

With regard to the online business, after considering several strategic alternatives, the sale of the Italian subsidiary was completed on December 30, 2022, thus ending the exit from this market.

Panamá

Codere started its business in Panama in 2005 and currently manages a wide range of businesses in this market, including gaming terminals, ten casinos, gaming halls, the Presidente Remón racetrack -unique in Central America- and online gaming (since 2021 it has added casino games to its online sports betting portfolio), affording the company a leading position in the Panama market.

Uruguay

Codere started its business in Uruguay in 2002, concentrating its operations in Montevideo and its outskirts. The group currently manages the National Maroñas racetrack, which has regained its good name as a top horseracing center since it was awarded the contract in 2003. The company also operates the Las Piedras racetrack and the Casino Carrasco Hotel, which in 2021 had been operating for one century since it was reopened. The group also operates gaming halls and online gaming in the country.

At the end of 2022, Codere Uruguay inaugurated a new gaming hall, **Maroñas Slots**, in Montevideo city. The premises will contain 280 modern slot machines and one horse racing betting hall

Colombia

Codere started its business in Colombia in 1984 and has since then maintained its leading position as one of the major bingo and gaming terminal operators in the country. The company completes its gaming offer with the management of casinos and online gaming.



Nueva Codere

03

03.1 Back to normal

Year 2022 marked the start of a new era for the markets, for society and also for Codere. After the complex scenario of the pandemic, the company reassumed its business, recovering the level of revenues it had before the health crisis and returning to a position from which to be able once again to consider value creation.

Its return to normal features a series of milestones:

- Financial restructuring.
- Creation and flotation on the US stock market (NASDAQ) of Codere Online.
- New Board of Directors and reinforcement of the management team.
- Promotion of the omnichannel offer.
- Reinforcement of digital capabilities.
- Codere branding.
- Progressive recovery of pre-pandemic levels.

Codere reacted fast to the unusual situations that arose as a result of the COVID-19 pandemic, demonstrating once again its flexibility and resilience.

From the beginning of 2022, once it found itself in its new corporate situation, Codere continued to adapt agilely and efficiently to the restrictive measures of each market, continuously adapting the organization to the challenging environment and searching in it the best alternatives, thus managing to maintain its business portfolio intact

The company the merger of its online subsidiary with SPAC DD3 Acquisition Corp. II, giving rise to Codere Online, which became the **first online gaming operator in Latin America to be listed on the US stock market (NASDAQ)**, coinciding with the startup of the online operation in Argentina. The success of these initiatives permitted Codere to continue the strong development of its digital offer in 2022 and give this business line a final push forward. The new company reached a level of revenues in the fourth quarter of the year 70% higher than that of the same period in 2021.

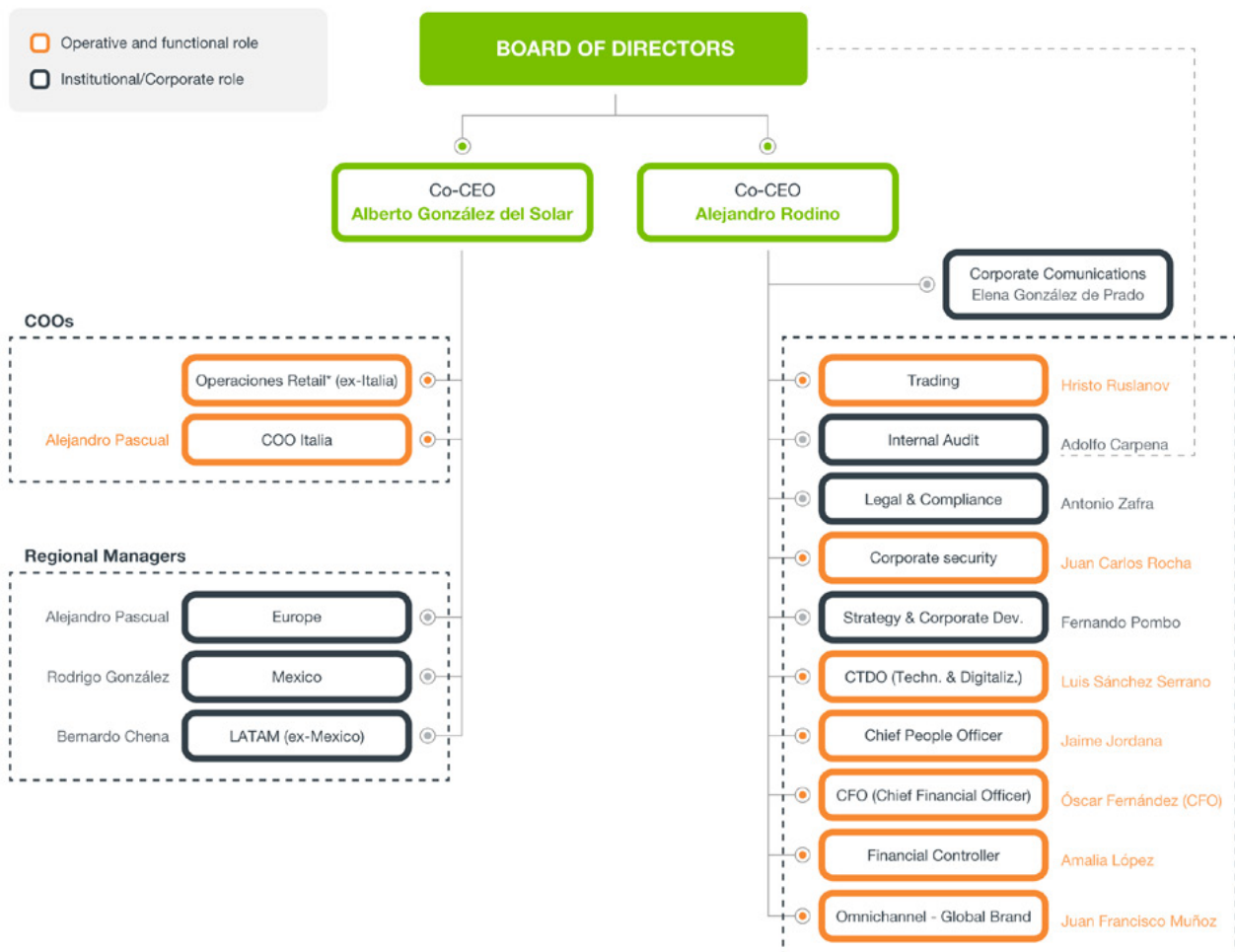
In addition, after its **new Board of Directors** was organized in February 2022, the supreme governance body of the group started to work



on defining the new route map for this stage, to consolidate its recovery and be able to undertake once again the creation of value for the group’s investors. In particular, the company continues to see significant growth opportunities in Spain, Mexico and online, and in the promotion of its omni-channel strategy, unique brand and digitalization.

At this stage, Codere has also **reinforced its management team**, replacing the General Management of the Group, and other key positions, such as the Chief Financial Office (CFO, the People Management, the Legal and Compliance Area and the Business Strategy and Development Area.

At December 31, Codere Group had the following organization chart:



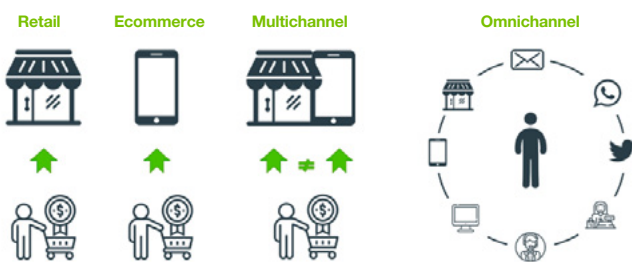
Omni-Channel

Over the past years, both the preferences and the behaviours of consumers have evolved. Consumers now wish to access the offer from any location, at any time and through any channel. It is because of this that Codere considers omni-channeling absolutely necessary to continue developing its entertainment offer.

On this premise, in 2022, the company has made progress in its strategy, remaining clearly customer focused, with the support of digitalization and technology, to provide an omni-channel offer that responds to the new user profiles, permitting them to start their experience in one channel and end it in another.

Although there is as yet a long way to go, we are able to say that Codere is one of the companies that offers users the best experience in this service, both for its relevant global retail presence and because none of Codere’s competitors’ omni-channel proposals reaches the level of our own.

Type of clients



Digitalization

Supplementing its omni-channel offer, in 2022, the company redoubled its efforts in **automation and digitalization**. To that end, the group has focused on making good progress in the simplification, standardization and digitalization of the processes, products and technological solutions of its online and retail businesses, and of the functional and support areas.

As a result, 2022 was marked by Codere’s consolidation as a global and innovating organization, not only from the product standpoint, but also from a technological point of view.

- First to be mentioned is the notable improvement, evolution and security of the company’s applications and technological services. To optimize its marketing capabilities, Codere has implemented the *Salesforce Marketing Cloud*, a solution with advanced features for the multi-channel management of customer relations, which will permit the company to get to know its customers (B2C) and its partners (B2B) better, both in retail and online. For talent management, it has implemented Codere Personas Digital (Cornerstone). This application supports the selection, onboarding, training, development, assessment, remuneration and administration processes, simplifying the day-to-day tasks and offering an overall view of employees’ life in the company.
- Second, Codere implemented teleworking expeditiously, defining a Corporate Remote Work Policy. Teleworking has led the group to need safer and more innovating systems, such as highly secured login processes. To meet these needs, the company has activated a safe authentication gateway for users (internal, external, suppliers and partners) and the corporate applications, instantaneously protecting the data and IT resources against identity theft, account takeovers and phishing.



- Codere has also expedited **digitalization in business-focused areas**, to remain always in step with the customers' needs and including, methodically and systematically, the new disruptive technologies and innovating businesses of the digital world that are emerging worldwide.
- Some of the key milestones of the year that render account of this is the deployment by the company of *OKTO's no-app, mobile-first cashless payment solution* at its gaming halls and sports betting shops network in its retail channel in Spain, for a safer gaming experience. The company has also designed and developed new last-generation sports betting terminals, such as *Automated* and *Table Top*, meeting the customers' expectations with a wide range of markets and broadcasting content connecting with their interests.

Codere Brand

Codere has continued to make major branding efforts. As a result, it is this year the *Main Sponsor* of Club Atlético River Plate de Argentina; it is also the official sponsor of Club de Fútbol Monterrey Rayados de México; and, the Official Betting House of Real Madrid C.F., for twenty Latin American countries.

In 2022, the company became Founding Partner of F1 Mexican Grand Prix; it has also signed as new sponsor of Club Atlético Lanús; it started the 'Copa Codere Internacional 2022' (2022 Codere International Cup); and, it promoted the Box in Mexico by the hand of TV Azteca, and women's football with NGO She Wins, among other activities.

All these efforts were recognized both by the industry and by the customers. Codere is considered one of the 100 most valuable and strongest brands of the *Brand Finance España 2022* ranking, and one of the most valued in Mexico, according to the *Las 500 empresas más importantes de México* ranking, consolidating the promotion of the brand in Latin America.

On its return back to normal, Codere continues to work day by day to improve its entertainment offer, promoting both its online and its retail business, and is positioned as the brand preferred by players at the global level thanks to its simplicity, trustworthiness and broad offer.



03.2 Commitment to CSR

The creation of sustainable value has been a basic principle that has inspired the group's activities from its start in 1980. Codere considers social corporate responsibility towards its various stakeholders essential to achieve this.

Codere expressly implemented this commitment in its **Corporate Social Responsibility Policy**, in 2016. Applicable to all group companies¹¹, this policy is intended to encourage a culture worldwide that contributes positively to the company, its customers, its shareholders and the communities in which the group performs its business. The purpose of this policy is also to grant fair consideration to all the groups that contribute to the success of its business project and to undertake the new investments of the group considering their social return, generating employment and richness for the company, with a view to ensuring a better future in the long-term without compromising the results in the short term.

In this respect, the group seeks with its corporate social responsibility strategy to position itself at the avant-garde of the best CSR practices, in its commitment to **transparency, excellence and improved competitiveness**, in order to:

- a. Further the implementation of the group strategy to offer a **safe, reliable and top**

quality business model, while respecting the environment.

- b. Make the group more competitive by applying **management practices based on transparency, equal opportunity, productiveness, innovation, profitability and sustainability.**
- c. **Manage responsibly the risks and opportunities** arising from the evolution of the market and the environment, in order to maximize the positive impacts and minimize the negative impacts of the activity to the extent possible.
- d. **Promote a culture of ethical conduct and increase corporate transparency** to generate credibility and trust in the stakeholders.
- e. **Encourage trust relationships and value creation** with all its stakeholders, giving them a balanced and integrating response.
- f. Contribute to **improve the good name and external recognition** of the group.

The **Corporate Social Responsibility Policy** contains the general and particular principles of action with stakeholders¹² to achieve these targets and the consequent adaptation of the corporate structure.

¹¹ Including its controlled companies, with the particular features that may be established in each case. In those investee companies that do not form part of it, the company will have them, through its representatives on their management bodies, bring their own policies in line with those of the company, for them to follow and effectively apply principles and guidelines consistent with those established in this *General Corporate Social Responsibility*.

¹² The communication with and value creation for our stakeholders is further developed in Chapter 6.2 *Value creation for our stakeholders*.



In line with this policy and to undertake the issues most relevant for the company and its stakeholders, Codere focuses on the areas of action on which it has the strongest social impact, although it also promotes initiatives to protect the environment. The social responsibility strategy is accordingly based on the following four pillars:

Social responsibility strategy of Codere	
 Responsible gaming	<p>The group has developed a Corporate Social Responsibility and Responsible Gaming Plan¹³, to implement the best responsible gaming practices, based on five pillars: (i) regulation of advertising, (ii) planning of gaming premises, (iii) gaming access control, (iv) image of the industry and (v) management of vulnerable groups.</p> <p>Through this plan, Codere promotes a strategy consisting of placing its commitment to responsible gaming in the center, listening to and analyzing the different points of view of its stakeholders, to take any steps that the company may consider necessary to define its guidelines of action and positioning and to minimize any adverse effect that its activity may have on society.</p>
 Development of human capital (Employees' CSR)	<p>The Employees' Corporate Social Responsibility Plan¹⁴ includes actions targeted both to collaborators and through collaborators to the company.</p> <p>The first group, actions targeted to collaborators, contemplates a set of policies and initiatives intended to improve the collaborators' working environment, with their concerns and needs as a priority. The plan is based on five pillars: (i) diversity and equality, (ii) inclusion, (iii) conciliation and wellbeing, (iv) integration and (v) sustainability.</p> <p>The second group of actions includes measures such as the Responsible Gaming Training Plan¹⁵, to inform all employees (giving priority to those in direct contact with customers or their management) of the actions taken by the company to promote responsible gaming.</p>
 Corporate governance and business transparency	<p>Corporate governance, compliance and transparency are fundamental values underlying the group culture. It is for this reason that Codere opts for a proactive attitude in these contexts, not merely meeting the applicable legal requirements, but also reinforcing its commitment to the best practices.</p> <p>The company seeks to become a reference in the private gaming industry, exceeding the expectations of shareholders and investors and promoting the creation of sustainable value through the implementation and communication of the best quality standards¹⁶.</p>
 Commitment to society and to the environment	<p>The group contributes to the development of the communities where it is located, allocating part of its profit to social initiatives in line with the company's targets, such as those taken to promote education and culture, to support vulnerable groups and to employ people with disabilities¹⁷. Codere works on establishing firm and solid relationships, taking into consideration the interests of its human team, its shareholders and the financial community, regulatory bodies, customers, suppliers, the environment and society in general (the "stakeholders")¹⁹.</p> <p>In respect of the protection of the environment, Codere considers the mitigation of its environmental impact and the preservation of the environment to be at the core of its social responsibility. In particular, the group focuses on the fight against climate change and the decarbonization of the economy, in line with the main national and international policies and efforts¹⁸.</p>

¹³ The Corporate Social Responsibility and Responsible Gaming Plan is further developed in Chapter 5.1 *Safe gaming*.
¹⁴ The Employees' Corporate Social Responsibility Plan and the actions taken in 2022 are further developed in Chapter 5.3 *People, driving force to change*. In addition, the sustainability actions are also developed in Chapter 6.1 *Respect for the environment*.
¹⁵ The Responsible Gaming Training Plan is further developed in Chapter 5.1 *Safe gaming*.
¹⁶ Chapter 4. Governance, ethics and compliance develops in depth the corporate governance structure, the compliance strategy and the transparency actions taken.
¹⁷ The social initiatives taken by the group are further developed in Chapter 5.2 *Responsible to the community*.
¹⁸ The communication with and creation of value for stakeholders is developed further in Chapter 6.2 *Creation of value for our stakeholders*.
¹⁹ Codere's strategy and preservation actions are developed in Chapter 6.1 *Respect for the environment*.



Governance, ethics and compliance

04

04.1 Corporate Governance

04.1.1 A new stage

In 2021, due mainly to the strong impact of the pandemic on the business and results of the group, Codere carried out a financial restructuring that commenced on April 22, 2021, when the company reached an agreement with its creditors. Under this agreement, the creditors injected funds into the group and undertook to capitalize part of the debt on the senior notes existing at the time and to reschedule the debt maturities. The restructuring was completed on November 19, 2021. Upon its completion, Codere, S.A., currently in liquidation, ceased to be the parent company of the group, transferring the operational part of the group to a new **unlisted company of Luxembourg, Codere New Topco, S.A. (“Nueva Codere”)**, the new parent company of the group. In turn, **Codere Newco, S.A.U (“Codere Newco”)** has become the main holding company and cash pooling vehicle of the operating part of the group.

Under the financial restructuring agreements, in December 2021, the liquidation of Codere, S.A. was agreed and the CNMV was requested to **delist its shares**, which were finally delisted on May 6, 2022.

Despite the fact that the shares of Codere S.A., were finally delisted, Nueva Codere remains **proactive in its corporate governance**, not limited merely to meeting the applicable legal requirements, but reinforcing instead its commitment to the best corporate governance practices.



04.1.2 Board of Directors

Nueva Codere’s governance is implemented through a Shareholders’ Meeting and a Board of Directors, as the supreme governance bodies of the group.

The Board of Directors is responsible for managing and representing the company and is thus responsible for all matters concerning the governance, management and administration of the company.

Composition of the Board of Directors

The Board of Directors consists, at December 31, 2022, of ten members, with Cristopher Bell as chairman, in his capacity as independent director.

Name	Office	Class	Group
Mr. Cristopher Bell	Chairman (non-executive)	Class A ²⁰	Independent
Mr. Antonio Moya-Angeler Linares	Member	Class A	Nominee Director
Mr. Vicente Di Loreto	Member	Class A	Chief Executive Officer
Ms. Isabelle Lambert	Secretary	Class B ²¹	Class B
Mr. Borja Fernández Espejel	Member	Class A	Independent
Ms. Leslie Ottolenghi	Member	Class A	Independent
Ms. Laurence Biver	Member	Class B	Class B
Mr. Mathieu Kakal	Member	Class B	Class B
Ms. Silvana Puto	Member	Class B	Class B
Mr. Michael Goose	Member	Class B	Class B

²⁰ “Class A” directors are those appointed for their independence, their employment relationship with the group or their relationship with any of the shareholders.

²¹ The rest of the directors, one to hold office as Secretary, are defined as “Class B”.



Board meetings

In 2022, the Board of Directors held up to seven meetings and adopted resolutions through the written procedure without assembly on five occasions. From among the most relevant decisions made, the following may be pointed out:

Corporate governance

The Board of Directors made proposals for the appointment of Directors; it approved the appointment of directors in group subsidiaries; it established and regulated the three Board committees; and, it approved the appointment of certain senior executives of the group.

Risk management

The *Codere Group General Risk Control and Management Policy* involves a risk control and management system with a clear definition and assignment of functions and duties at the operational level²². This year, the Board of Directors has approved the group risk tolerance and risk map for this fiscal year.

Financial affairs

The Board of Directors has reviewed and approved the 2021 consolidated annual financial statements of the group. The Board of Directors of the company has also approved the budget for 2022 and the short-term incentives plan of the group monitoring.

Other relevant issues

In addition, the Board of Directors has approved certain private corporate and business transactions with its subsidiaries in Colombia and Panama.

04.1.2.1 Board Committees

In line with the company's commitment to corporate governance, the Board of Nueva Codere performs its work through three committees, each one of them with specific functions: (i) the Audit Committee; (ii) the Appointments, Remuneration and Corporate Governance Committee; and (iii) the Compliance Committee.

These non-executive committees have the mission of supporting the Board of Nueva Codere in its main functions, analyzing in depth some of the matters to be subsequently approved by the Board. Their composition, responsibilities, duties and powers are defined in their charters, approved in advance by the Board. For all three committees it is also contemplated that the majority of their members be independent directors.

The Audit Committee, the Compliance Committee, the Appointments, Remuneration and Corporate Governance Committee were agreed on November 19, 2021, under the Shareholders' Agreement. The committees are subject to the provisions of the Shareholders' Agreement, the laws of the Grand Duchy of Luxembourg, the corporate bylaws and the Nueva Codere Board resolutions of March 30, 2022, approving the regulations and appointing the members of each committee.

²² The group risk management is further developed in Chapter 4.6.



Audit Committee

The main function of the Audit Committee is to support the Board in its financial and risk supervision tasks, review of the communication with the markets and control of the operation of the Internal Audit department.

The main matters discussed by the Audit Committee in 2022 were: (i) the appointment of statutory and independent external auditors in several group companies; (ii) supervision and management of the internal audit functions; and (iii) follow up of the accounting statements or presentations of results of the company.

Functions of the Audit Committee

- Assist the Board in supervising the quality and integrity of the financial statements of the company and their reporting.
- Supervise the internal audit department and know the financial reporting process and internal control systems.
- Review regularly the risk control and management systems, including tax risks.
- Supervise the qualifications, independence and performance of the company's independent auditor.
- Assist the Board in its supervision of related-party transactions.
- Perform any other functions that may be assigned to audit committees by the laws or regulations of the Grand Duchy of Luxembourg, from time to time, provided that such laws, regulations or provisions are applicable to the company.

At December 31, 2022, the Audit Committee of Nueva Codere, consists of the following directors:

Name	Office	Group
Mr. Borja Fernández Espejel	Chairman	Independent
Mr. Christopher Bell	Member	Independent
Mr. Vicente Di Loreto	Member	Class A



Compliance Committee

The Compliance Committee is responsible for verifying and controlling compliance with the applicable national and foreign legislation, particularly, gaming laws and regulations. The Compliance Committee also assesses the existing internal control systems used to monitor compliance with the law for the prevention of money laundering and terrorist financing.

In 2022, the Compliance Committee has focused on reviewing and approving the compliance plan and model of the group.

Functions of the Compliance Committee:

- Review the compliance by the group with applicable gaming law.
- Assess the internal control systems of the group to monitor the performance of its gaming and anti-money-laundering obligations.
- Supervise the Reporting Channel, permitting employees, customers, suppliers and other third parties to report confidentially and anonymously any potentially relevant irregularity.
- Supervise the criminal liability risk model of the group.

At December 31, 2022, one of the positions on the Compliance Committee was vacant. The Compliance Committee consisted of the following directors:

Name	Office	Group
Vacant	President	-
Mr. Christopher Bell	Member	Independent
Mr. Vicente Di Loreto	Member	Executive



Appointments, Remuneration and Corporate Governance Committee

The functions of the Appointments, Remuneration and Corporate Governance Committee include:

- Search for and assess candidates to fill vacancies on the board or senior management positions of the group.
- Make decisions on any matter relating to the general Remuneration Policy of the company.
- Assess the performance of the Board.

The main matters managed by the Appointments, Remuneration and Corporate Governance Committee in 2022 were: (i) the appointment of members of senior management (ii) the monitoring of the group short- and long-term incentive plans.

At December 31, 2022, the Appointments, Remuneration and Corporate Governance Committee consists of the following directors:

Name	Office	Group
Mr. Antonio Moya-Angeler Linares	Chairman	Nominee
Ms. Leslie Ottolenghi	Member	Independent
Mr. Christopher Bell	Member	Independent

04.1.2.2 Directors' Remuneration Policy

In 2022, the Shareholders' Meeting of Codere set the maximum remuneration in the aggregate for the members as a whole of the Board of Directors at one million four hundred thousand euros per year²³. This amount will remain in effect until the 2023 Annual Shareholders' Meeting. The individual remuneration of each of the directors has also been approved by the Shareholders' Meeting.

²³ Information not available by gender since the services of some of the directors are outsourced with a corporate services company, which invoiced an amount in the aggregate for its services, without a breakdown by genders.



04.2 Compliance

Codere's compliance strategy goes beyond the particular legislative requirements of the sector to apply the best practices, in order to ensure that the company's objectives are achieved supported by its culture of integrity and transparency.

Codere aims to have the group's activities and businesses performed in compliance with legislation in force and with the established internal policies and procedures, ensuring that all international, national and local legal requirements are met, while remaining the reference in the industry for implementing the best standards to identify operating and legal risks and establishing the procedures necessary for their prevention, management, control and reaction.

Codere's commitment to ethical conduct requires joint efforts and responsibility meaning that each member of the company must know and act in accordance with the defined values and rules. Compliance plans and training courses are encouraged for all employees and the corporate *Code of Ethics and Integrity* is promoted to prevent crime and inspire a culture of transparency.

For a strategy to be efficient, it must be submitted to ongoing review and evolution. The internal compliance handbooks, documents

and procedures are accordingly under constant review to adapt to legislation in force and be at the *avant-garde* of the most advanced quality standards.

Codere ensures in this way that it creates sustainable value, enhances its good name and raises trust and credibility in its stakeholders.

Code of Ethics and Integrity

Codere's Compliance function has at its core the *Code of Ethics and Integrity (CEI)*, applicable to collaborators, suppliers and providers. The CEI is a key document and an essential pillar of the corporate culture, containing the guidelines of conduct expected from the group's professionals for them to act in compliance with their legal obligations respecting also the defined corporate values and principles of ethics and integrity. The CEI is supplemented by internal handbooks, procedures and policies as further developed in each of the respective sections below.

The CEI defines the duties inherent in the various roles, implements the ethical conduct to apply in stakeholder relations, establishes the ethical guidelines for action and provides procedures to report any breach or practice contravening the rules of conduct (such as the Reporting Channel), to ensure a kind, respectful and egalitarian working environment.



The content of the Code of Ethics and Integrity is based on the most demanding international standards, such as the *United Nations Universal Declaration of Human Rights*²⁴, the International Labour Organization (ILO) Agreements, the *ILO Declaration on Fundamental Principles and Rights at Work*²⁵, the *OECD Guidelines for Multinational Companies* and the *United Nations Global Compact*.

Ethics, Anti-Fraud and Compliance Committee

To perform its duty of due control, the company, under legislation in force, must not only implement permanent control procedures but also appoint internal control bodies to supervise the risks of the company and the functioning of the implemented controls.

The implementation and supervision of the CEI have been entrusted to the Ethics, Anti-Fraud and Compliance Committee, formally organized on November 26, 2020. This is an executive body reporting to the Compliance Committee and that operates both at the corporate level and in each of the business units of the group (in Italy, an external expert has been appointed to perform the task).

The Ethics, Anti-Fraud and Compliance Committee has independent decision-making, monitoring and control powers and to be pointed out among its many functions are the dissemination of the *Code of Ethics and Integrity*, the management and dissemination of the Reporting Channel and the promotion of training plans for the prevention and detection of unlawful, criminal or fraudulent conduct.

The Reporting Channel and the Internal Reporting and Investigation Protocol

In line with its firm commitment to ethical conduct and integrity, Codere promotes the use of its Reporting Channel as a communication tool accessible not only by employees but also by suppliers and third parties, to make it easier to report any reasonable indication or sign of unlawful conduct or breach of the CEI or of any other applicable law or regulation. In the various internal actions carried out, such as dissemination campaigns, training on Compliance or new internal regulations, employees are reminded of the need for them to report for Codere to be able to detect, mitigate and resolve any irregularity that may occur, ensure a transparent working environment and prevent unlawful conduct, crime and, thus, damage to its reputation.

Through the “Reporting channel, making the best company” campaign, Codere encourages all employees and stakeholders to use this channel emphasizing two of the characteristic features of this tool: safeguard of the confidentiality of the reporting person’s identity and prohibition from adopting measures of retaliation against the reporting persons who act in good faith.

In addition, Codere Group has in place a **Reporting and Investigation Protocol**, approved on July 14, 2021, which establishes the general procedure of the internal reporting channels and develops the duty of investigation of the Ethics, Anti-fraud and Compliance Committee throughout the proceeding.

²⁴ Because the content of the Codere Group Code of Ethics and Integrity is based on the United Nations Universal Declaration of Human Rights, it is considered to include the commitment of the company to prevent discrimination at work, to eliminate forced labor and to abolish child labor.

²⁵ Since the content of the Codere Code of Ethics and Integrity is based on the International Labour Organisation (ILO) Agreements, the group assumes compliance with the fundamental agreements of the ILO relating to respect for free association and the right to collective bargaining.



Workplace Violence Prevention, Response and Eradication Protocol

In 2022, Codere furthered its efforts for the protection of its workers, updating its **Workplace Violence Prevention, Response and Eradication Protocol**, applicable in all countries in which the group operates.

The protocol, in line with the principles of the CEI, is focused on following up any form of workplace mobbing, bullying or sexual harassment, supporting the victims and promoting preventive measures.

The protocol is inspired by the principles of self-respect and defense; promotion of a health working environment stimulating professional development and performance; equal access to productive resources and employment; and, due diligence, non-revictimization and confidential treatment of people involved in the proceedings.

Training and Communication Plan

Codere is well aware of the rules to be followed and of the need for them to be known and applied by all team members. To this aim, in 2022 the company continued to afford internal training on matters of ethics, integrity, prevention of money laundering and of terrorist financing and anti-corruption. In this respect, the following training courses, given both at the corporate level and also in the countries in which the company operates, are pointed out:

- Monthly training to all newly hired employees on the CEI and the crime prevention and anticorruption model.
- Training to all employees on the prevention of money laundering.
- Training on matters of gifts and hospitality, conflict of interest and due diligence of suppliers at the corporate level.

Codere shares the compulsory **Corporate Policies** with all persons with which it cooperates making them available for consultation on the group intranets and disseminating them this year specifically through the internal communication campaign “Corporate policies, shared commitment”.



In addition, the new approved policies are circulated among and signed by everybody to whom they apply for their knowledge and acceptance. As examples of this year 2022, the *Hall Gaming Policy* and the *Alcohol Consumption Policy*, restated and approved by the Ethics, Anti-fraud and Compliance Committee.



The 'Compliance Corner' in Codere Actualidad

To give these matters visibility, the **Compliance Corner** was opened this year. This is a specific section in *Codere Actualidad*, the corporate newsletter, where the company publishes articles with miscellaneous Compliance content to ensure a common view of the duty as an employee as employee and as company, to raise sensibility on the matter and to promote the ethical commitment among all members of the organization.



This channel is used to share the function structure, internal and external laws and applicable standards and to provide practical examples and new cases for an easier understanding.

Quarterly anti-money laundering (AML) and terrorist financing (TF) reporting

Codere is firm in the performance of its obligation to report to the responsible authority any event or transaction that may be considered suspicious of money laundering and to meet any other request made by that authority.

In 2022, the Legal Counsel and Compliance Management prepared quarterly AML reports. These reports, issued by all the business units of the group, include consolidated quantity and quality information on the AML reporting to

the authorities, identification of customers and potential incidents, among other matters.

In addition, the remittance of these reports notwithstanding, a direct line of communication has been enabled with the persons responsible for the subsidiaries, to be able to know immediately -if registered- any serious AML incident for its assessment and potential escalation to the Codere Compliance Committee.

Main objectives for 2023

For 2023, Codere's main objectives include:

- Proposal to update the policies in force and approve new policies, such as the *Corporate Crime Prevention Handbook* or the update of the *Corporate Anti-Money-Laundering Handbook*, inter alia.
- Structuring and review of the relationship and responsibilities with Codere Online, considering the services provided by several group subsidiaries.
- Deployment of Compliance control procedures: development of the project to implement control automation for AML and crime prevention (SAP GRC).
- Continuation of the training and raising sensibility on Compliance matters



Results of the controls and actions of 2022

In compliance with the applicable policies and legislation, the company carries out certain controls and actions in order to ensure that its principles are correctly applied. The results of those carried out on the retail business are set out below:

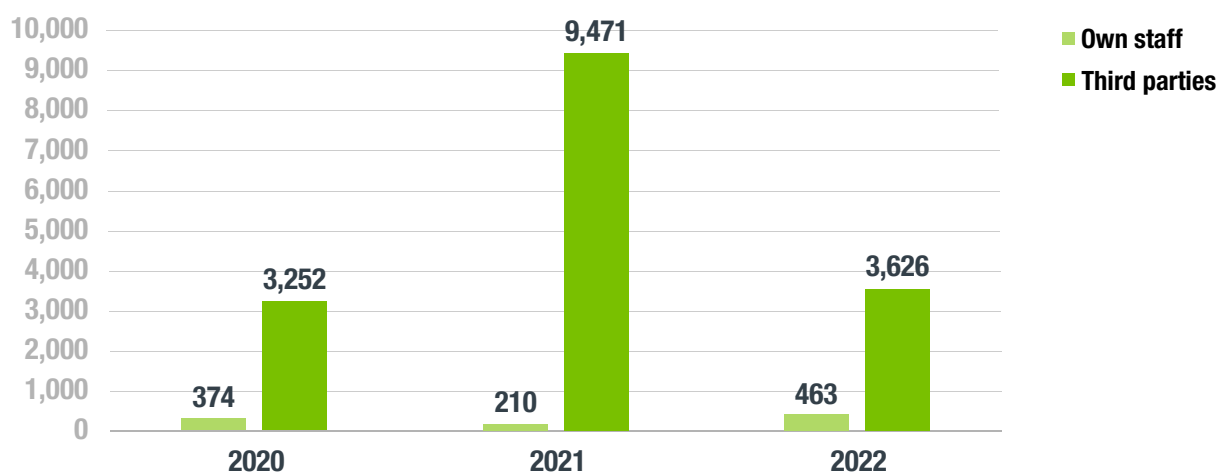
1. Customer identification and due diligence of employees, suppliers and shareholders:

Without prejudice to the general principles defined in the group context, each country has specific procedures in place, as required by legislation in force, to identify its customers -for online gaming and retail -, analyze their gaming history and in the event report information to the authorities for the prevention of money laundering and terrorist financing.

In addition, to ensure compliance with the legal obligations and defined ethical standards, the documents and information to be reported by Codere professionals or related third parties, and the verifications to be carried out by the Compliance department are established.

Due diligence processes in 2022

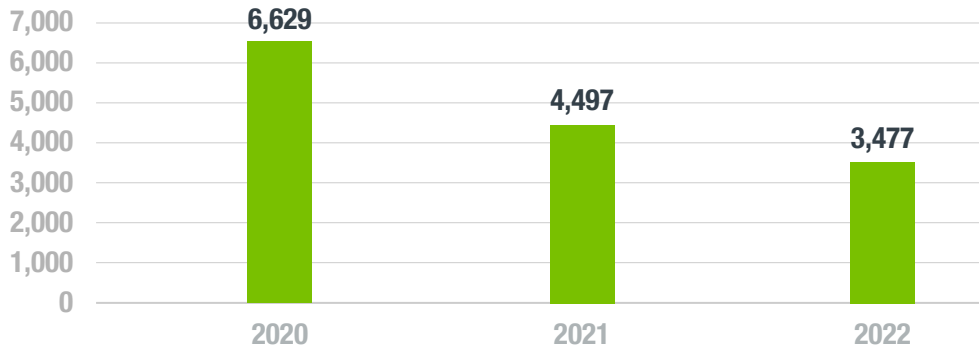
Country	Own	Third parties
Spain	0	2,841
Argentina	276	41
Colombia	148	197
Italy	0	108
Mexico	94	471
Panama	180	119
Uruguay	41	9
Total	463	3,626



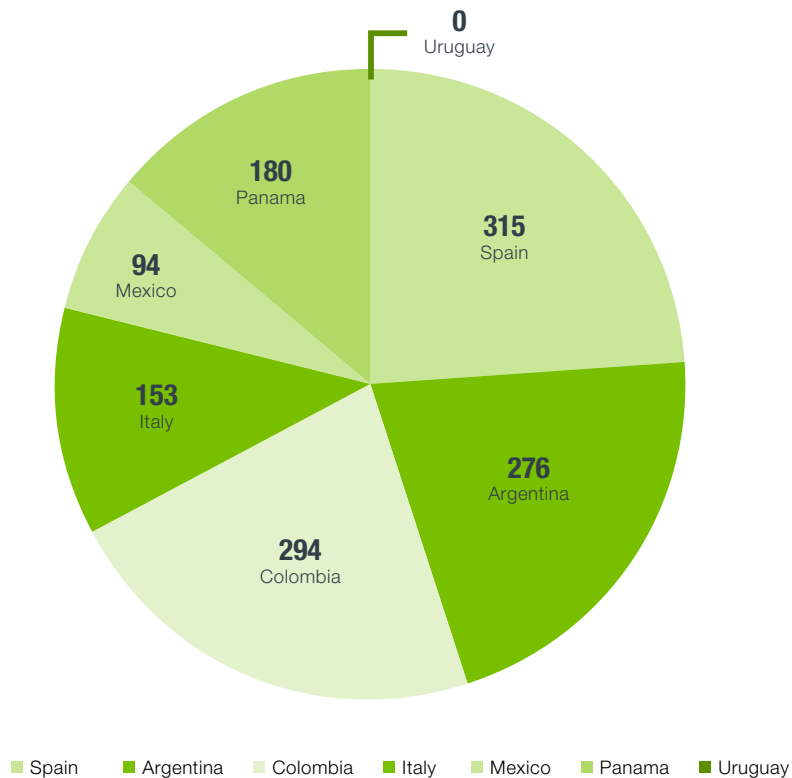
2. Training afforded to group professionals

Regardless of their role and of the functions assigned, including not only the legal provisions in force for the prevention of money laundering but also the *Code of Ethics and Integrity*.

Evolution of employees adhered to training on AML / Anti-Corruption



Employees adhered to the *Code of Ethics and Integrity* per country

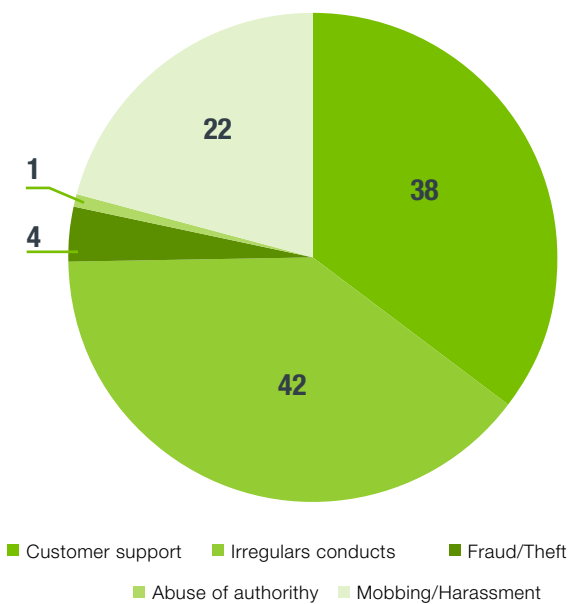


3. Reporting Channel:

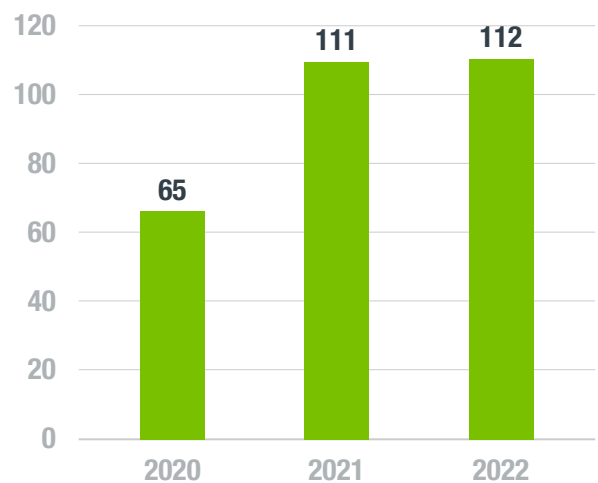
In 2022, a total 112 reports were received, classified according to the five types of the company classification: unlawful conduct, customer service, fraud/theft, mobbing and harassment and abuse of power. 88% of the received reports were satisfactorily resolved²⁶ and those in progress are being resolved in accordance with the procedures in force.

Country	Number of reports
Spain	13
Argentina	40
Colombia	4
Italy	1
Mexico	46
Panama	3
Uruguay	5
Total	112

Type of reports received



Evolution of the number of reports received



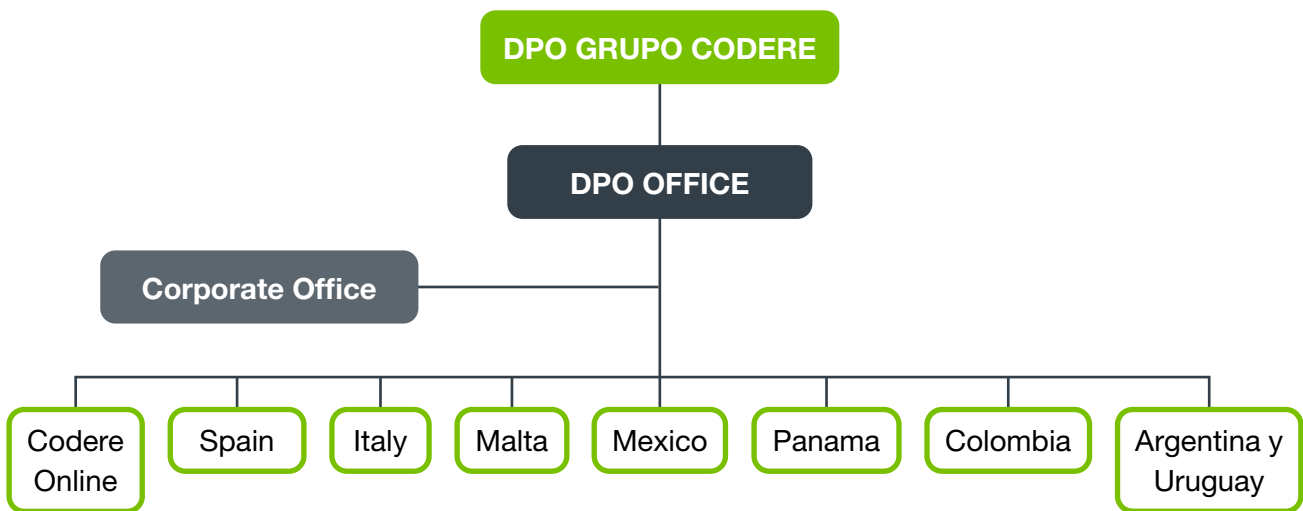
²⁶ This year 2022 no reports have been received for violation of Human Rights. The classes of reports received are for customer service, unlawful conduct, fraud/heft, mobbing/harassment or abuse of power, none of them for violation of Human Rights.



04.3 Data Protection

Codere considers the processing and security of the personal data that it controls to be a major commitment and works to become a reference company also in the protection of privacy. In 2022, the organization continued to act stringently to avoid any risk of inappropriate personal data management.

Codere's *Privacy Governance Model* is implemented through a DPO (*Data Protection Officer*) supported by a corporate office and the various local and business line data protection managers:



Codere's activity is subject to wide and varied regulations, that vary depending on the geographical location, the company having to adjust the management of its operations to the local peculiarities.

Given its business, Codere manages a large volume of customers' confidential personal data, which it must keep protected and control to prevent any damage from being caused to them and avoid infringing applicable legislation, thus making effective its commitment to privacy.

Codere has demonstrated its commitment to personal data security and protection throughout

the year by the fact that the tests it carried out (both global and specific) identified no security breaches that, under applicable regulation, should be reported to the regulatory authorities for implying a relevant risk or impact on security.

Thus, 2022 has done nothing but confirm that the security measures and action protocols implemented by Codere to face its privacy risks are appropriate.



04.3.1 Main actions in 2022

In 2022, Codere continued to take steps forward in its commitment to keep its internal privacy processes, policies and protocols up to date.

The **Processing Activities Record (PAR)** has been reviewed and updated, with the participation of all the areas of the company involved. This process has been of use for the group both to define the data processes already known by the DPO Office and to detect those that had not been notified by the areas, consolidating the culture of reporting to the DPO Office any initiative involving data processing from its origin (*Privacy by Design Protocol*).

The **Data Retention Protocol** has been updated to keep only the data necessary for the various purposes for which they were collected and to respond to any court claims and/or take action for the defense of Codere.

In the context of international transfers of data, the company has been working in cooperation with all the countries involved on the creation of a *Framework Personal Data Processing Agreement* to regulate the processing between the various Codere companies in the **inter-company provision of services**. The purpose of this framework is to regularize international transfers of data between the Codere companies located in countries outside the European Economic Area (EEA), in compliance with the General Data Protection Regulation (GDPR).

Also, as regards the **group purchases process**, the project commenced by the DPO Office in 2021 has been continued to facilitate and expedite procurement processes with third parties, ensuring that personal data protection laws are strictly observed. Thus, in 2022, the company has implemented the **supplier validation** module for privacy purposes in the *SAP Ariba* solution, now in place in the group as a whole. The module sends an automated questionnaire to be completed by each supplier,

permitting Codere to assess whether the supplier in question meets the required privacy standards.

Once the supplier validation process is completed, the **procurement process** starts. In respect of this process, a project has commenced to prepare general terms of contract relating to data protection, to expedite procurement with suppliers while ensuring that all data protection safeguards are provided.



04.3.2 Objectives for 2023

True to its commitment to security and privacy, Codere's objectives for the coming year in this matter must focus on the promotion of security, governance and training.

To that end, the DPO Office intends to start up a project to unify the protocols applicable to data security incidents and breaches within the organization, together with the Information Security Management Systems (ISMS) department, for Codere to have a single procedure for this matter, in line with the requirements of law and the guidelines of the regulatory authorities on the matter.

Continuing Codere's strategy to promote business in Latin America, one of the main objectives of the DPO Office will be to encourage all LATAM subsidiaries to become involved in compliance with local laws and the group corporate regulations on data protection. For the purpose, the particular features of the local laws will be identified, with a view to undertaking international projects for omnichanneling and the centralization of operations, and for an agile and quality processing of transversal matters, particularly focusing on personal data protection.

Also, the objectives of the Area include reinforcing the regulatory framework of international data transfers, through the approval of Binding Corporate Rules which, at the corporate level, include personal data protection policies that provide adequate safeguards in the context of international data transfers made by companies established in the European Economic Area (EEA), as data controller or processor.

It is likewise a priority for 2023 to continue promoting the current data protection governance model of the group, involving the senior management in the matter, providing the governance bodies with a more specific

procedure and structure and establishing the rules to govern the decision-making and accountability process, all the above to ensure that data protection procedures are complied with both by Codere and by its managers, employees and third parties.

As each year, it is forecast that new privacy and security training and awareness raising campaigns will be carried out targeted to the employees and senior management of the group on incidents that may affect the personal data of which Codere is the controller.

Finally, regarding information security certifications, Codere will cooperate in the processes for the renewal of the ISO/IEC: 27001 certification, intended to ensure the confidentiality, integrity and availability of the information, in order to undertake the process to obtain the ISO/IEC: 27701 certification, for implementation of an Information Privacy Management System (IPMS).



04.4 Cybersecurity

Codere has given cybersecurity an indispensable place in its chain of value. Proof of this is the ongoing efforts it has made to increase the levels of protection of its technological infrastructure, a key factor to meet the permanent threats faced by a company of the size and type of business of Codere.

The organization recognizes the importance of having a **robust cybersecurity** strategy in order to **mitigate risks** and **increase the trust** of its customers.

Codere has known over the years how to be flexible and efficient in adapting to the new environment, falling into step with the changes in the customers' priorities and the new teleworking systems, with the necessary digitalization and security, implying reinforcing the measures previously implemented with new protection systems.

Cybersecurity Awareness Plan

To raise awareness on cybersecurity in the organization, Codere affords its collaborators with further knowledge and tools for IT security to become installed as part of the company's compliance culture and to ensure a proactive supervision of the matter.

In this context, in 2022, the group has continued to develop and update the **Cybersecurity Awareness Plan** commenced the past year, which reaches all the areas of the company. The main milestone to be pointed is the significant improvement of the results of the phishing campaigns in respect of the past year, showing an increased level of internal awareness regarding cybersecurity.

Before risks, prevention

Codere is permanently exposed to cybersecurity risks, which requires both its employees and its systems to be always on alert.

Risks such as fraud or misuse of personal data and those related to suppliers (of software and machines, payment processing, app development and maintenance and online tools) and those others that are faced, to a greater or lesser degree, by any entity (such as identity theft, malware and system failure with interruption of business, data leak or DDoS attacks), are common.

In this context, true to its corporate culture, Codere takes a **preventive approach** to cybersecurity, which has allowed it to adapt and counteract the unforeseen situations that it has had to face over the past year.

2020-2023 Security Master Plan (SMP)

Codere continues to implement its *2020-2023 Security Master Plan*, which establishes a governance model defining the priorities, duties and resources to improve in security at the strategic, tactical and operational levels. This structure is the basis of the system implemented by Codere to face cyberattacks.

The pillars of the *2020-2023 Security Master Plan* are governance, protection, surveillance and resilience, in respect of which Codere has achieved several key milestones in 2022 demonstrating that the plan is moving in the right direction:



- In matters of **governance**, progress has been made in the *Cybersecurity Awareness Plan*, simultaneously updating the internal regulations with effects on cybersecurity. Also, improvements have been made in the ISO/IEC: 27001 certification and, as explained in depth in the above section on data protection, the *SAP Ariba* solution has been put in place for the validation of suppliers for privacy purposes, including a security assessment of the suppliers.
- In respect of **protection**, Codere has started to deploy the multi-factor authentication (MFA) system, allowing the company to protect the most exposed identities. The *Security Service Edge (SSE)* has also been deployed and the group is now able to manage different security solutions from a unified console. Finally, in 2021, a public applications protection service (WAF) was implemented, with 31 protected sites in 2022.
- At the **surveillance** level, the culture is one of ongoing improvement of the handbooks and adaptation of the protocols to improve actions relating to incidents already known. The company has a cyberintelligence service and a unified vulnerabilities management process. In 2022, Codere continued to develop the monitoring of its activity putting the focus on cybersecurity, adding practical cases and including additional sources.
- Finally, **resilience** was enhanced in 2022 with the execution of a *Red Team* exercise to detect vulnerable points in corporate applications and infrastructures. Along the same lines, to increase awareness of cybersecurity matters, the company has carried out two drills with the *ISMS Forum*, with considerable satisfactory results.

We are all cybersecurity

In an environment that becomes more digital day by day, to ensure the protection of information is a strategic need to meet which it is essential for the entire organization to know and adopt the best habits in the adequate use of the company equipment and systems.

With this aim, in 2022 a new space has been enabled in the corporate newsletter *Codere Actualidad*, namely **CiberHub**, where cybersecurity advice is shared at the corporate level worldwide to protect Codere's system between us all in the best possible manner.



Also, to have always only the most secure systems in place, in 2022 the company has implemented a double factor authentication solution that protects the IT resources and data of the organization instantaneously against the theft of identity, fraud in accounts and phishing. It is the objective of the company to advance towards a password-free future, as something more than a factor that replaces codes, reducing the possibilities of success of a potential cyberattack.



Our objectives for 2023

Cybersecurity is a strategic priority and in 2023 it is the objective of the group to continue to consolidate the corporate culture consisting of considering security to be everybody's duty, for which purpose the company develops initiatives allowing it to continue improving its level of security.

Thus, in 2023 efforts will focus on increasing the level of maturity of the actions and projects implemented in 2022. Codere also expects to continue reinforcing the organization structure of the area and to complete the design of strategies to improve the protection of services in the cloud in the SaaS, PaaS and IaaS service models.

**Note: it must be pointed out that all the security solutions are for global use and are applicable in all the countries in which Codere performs its business.*



04.5 Risk Management

In Codere, risk control and mitigation actions are inspired always by the basic principles of action established by the Board of Directors in the *General Risk Control and Management Policy*. Some of these principles are:

- Integration of risk-opportunity into group management.
- Operational separation of the areas responsible for analysis, control and monitoring of the organization, ensuring an adequate level of independence of each one of them.
- Safeguard of the correct use and adequate registration of risk hedging instruments.
- Transparent information on the risks of the group and the correct functioning of the implemented risk-control systems.
- Safeguard of adequate compliance with the rules of good corporate governance and the corporate values established in the *Code of Ethics and Integrity*.

In this regard, the ***General Risk Control and Management Policy*** defines eight classes of identified risks, including corporate governance risks, operational risks, regulatory risks, tax risks, indebtedness risks, country risk, technological risk and reputational risk.



Risk control and management system responsibilities

The *General Risk Control and Management Policy*, with its basic principles, is implemented through a risk control and management system, based on a definition and assignment of functions and responsibilities at the operating level, and adequate procedures and methods for the various stages and activities of the system, including:

1. Regularly reviewed and updated definition of the risk tolerance by the Board of Directors.
2. Annual identification and analysis of the relevant risks by the persons responsible for each business unit and/or department at the local level taking into account their potential effects on the key targets in each country.
3. Annual update of the various risk maps of the company (local, technological and corporate).
4. Reporting of the main risks, particularly those exceeding the limits established by the Board of Directors.
5. Implementation and control of compliance with policies, guidelines and limits, through the necessary and adequate procedures and systems to mitigate the impact of the realization of the risks.
6. Regular assessment and reporting of the results of the risk control and management monitoring.
7. Audit of the system by the Internal Audit Area management, to which the Audit Committee itself, after delegation by the Board of Directors, has entrusted the duty of regularly reviewing the internal risk control and management systems.

In addition, Codere has a corporate **Tax Risk Policy**, which is reviewed by the Board of Directors.

At the local level, each business unit issues a regular report on the activities undertaken and the risks realized in each country. This information is consolidated by the Audit Area and used to update the risk maps and prepare this Statement of non-Financial Information or Annual Integrated Report.

On updating the **risk maps** of the company, the Codere Internal Audit Area defines its annual working plan, in addition to the risk management process. To prepare this plan, the internal procedures and improvements implemented and identified in the year are reviewed. The risks realized the year before are also reviewed.

Also annually, the various local Internal Audit units are submitted to an internal review procedure, i.e., the **Quality Review**. Each year, the Internal Audit Department organizes crossed reviews of the projects of each business unit, having the managers of the subsidiaries examined by their counterparts, thanks to which synergies are also obtained and homogeneous processes are applied in the group as a whole.

After the change of method in 2022, having all audits based on risks, in documentary form, the correct application of the measure was reviewed, obtaining satisfactory results and not identifying any relevant weakness.



Milestones of the Internal Audit activity in 2022

Codere, has continued its risk control and management efforts this year, in order to meet the risks inherent in its activity. These efforts are represented, mainly, by the following milestones:

1. Performance of **operating audits** focused on the major risks, in accordance with the specific plan of each country.
2. **Continuity of the alert system** to prevent the loss of revenue and follow up the Revenue Assurance project, for predefined events to be regularly identified alerting of potential signs of fraud or malfunctioning, for them to be analyzed and promptly corrected.
3. Strengthening of the **steering committees** following up the Internal Audit recommendations, to implement the improvements suggested in the reports.
4. Specific review of compliance with **anti-fraud and anti-money-laundering policies and laws**.
5. Continuity and improvement of the automation of the extraction of information through the **Robotics project**, in the context of its procedure automation and digitalization strategy. Other new robots have been set up for **Spain and Mexico**.
6. **Consolidation of the Anti-Fraud Committee** in the various countries, allowing a better detection and prevention of fraudulent conduct in the organization.
7. Establishment by the Anti-Fraud Committee of a **new regulatory compliance framework**.

Codere has the following main objectives:

1. To **maintain and strengthen the steering committees** following up the main recommendations issued by Internal Audit, where the actions taken are analyzed and those pending are planned.
2. Performance of **operating audits** focused on the areas of most risk according to a specific plan for each country.
3. Enhancement of the **Ongoing Audit** and **Operating Alert Indicator** procedures.
4. To continue developing the **Robotics project** automating new tests.
5. Assessment of the **reliability of the transactional software**, through system audits using the COBIT method.



2022 Risk Map

In accordance with the plans established by the Codere Internal Audit departments in the various countries in which the group operates, the company identifies and analyzes the processes and risks of its transactions in order to design a risk map for each business unit:

Health crisis risks

Despite the outstanding positive evolution of the company in 2022, the health crisis caused by the COVID-19 has continued to impact the activity of the company. Nevertheless, the probability of occurrence of the risks related to the Coronavirus has reduced considerably and is now estimated as remote. Codere has thus maintained on its risk maps two of the four classes of risks related to the potential effects of the pandemic, already identified the year before:

- Risk of new closures of establishments if there are new bouts of the Covid-19, which could mean limited occupancy and opening hours. The economic impact of this kind of measures is directly proportional to the intensity and time of application and could impact differently in each of the countries in which the company operates.
- Risk of potential breach of financial commitments due to a delay in the recovery of revenues after the pandemic, increased by the current context of uncertainty and fluctuation, increasing the difficulty for any company to prepare its accurate financial plans.

Regulatory risk

The gaming industry is highly regulated worldwide. The activities in which the company engages, both retail and online gaming, are subject to different local laws. In some cases, the company has to face stringent controls, within limited licenses and heavy tax burdens, while in others, with lower taxes, there is strong competition. In all cases, the tax, compliance and data protection laws are highly relevant. Because of this, flexibility and adaptation to the environment are key issues for Codere.

Codere has identified the following main regulatory risks:

- Risks that the licenses may not be renewed, since the authorities might deny, revoke, suspend or reject the renewal of the licenses that Codere currently holds in the jurisdictions in which it operates and impose penalties in the event of any violation of the applicable provisions. In addition, the renewal of the licenses may be subject to uncertainties such as, for example, that the regulation may not be clear and may be amended or possible to construe in different manners. In this context, the regulation of aspect linked to the gaming industry (such as the consumption off tobacco in the halls, opening hours, site restrictions or commercial communication bans) may have an adverse effect on the group's revenues.
- Risk of changes to the legislation in force of its construction, including legislation not directly focusing on gaming (such as tobacco, money laundering, etc.), with a potential adverse effect on the group's revenues and its capacity to expand its business.
- Risk of an increased the tax burden on the group. In this respect, changes in taxes and new taxes or duties that may be imposed could have significant adverse effects on the business, financial position and commercial results of the company.



Reputational risk

Regulatory risks and reputational risks are clearly interconnected in any industry, particularly in the current age of information and communication. This risk is accentuated in the case of the gaming industry, where applicable laws and regulations are constantly updated, and which the public has not always perceived benevolently.

The gaming industry is complex and its relevance as an economic player, employment generator and tax collector has reached society with certain difficulty. In some countries (particularly Spain and Italy) social alarm has been triggered by the myths disseminated on the on the industry and the lack of knowledge of its real numbers (number of halls, advertising, incidence of problem gaming, etc.).

Political, economic and monetary risk for international transactions, particularly in Latin America

The company continues to diversify its activity and operate in various regions to reduce its exposure to political and economic risk. However, as any other undertaking, it is affected by the tensions in the countries in which it operates. In this respect, the potential problems of economic recession, inflation, unemployment and social conflict, particularly in Latin American countries, may have effects on the results of the group. In addition, the profits and losses on Latin American transactions are stated in currencies other than the euro and their depreciation may reduce the cash flows of the Latin American subsidiaries. In this respect, the group has identified mainly the following risks:

- Risk of dependence on the Argentinean market, which also represents a major part of the EBITDA of the group. This country has also historically suffered recessions, social crises and the depreciation of its currency. In addition, the Argentinean government

might impose restrictions on cash transfers from Mexico to Spain or the financial costs to send transfers, if these are possible, might be very high. If this risk were realized, difficulties might be encountered to finance the group activities or even to pay the interest on the bonds

- Risk of dependence on the Mexican market, since the EBITDA of Mexico represents a major part of the consolidated income of the group and the country has suffered historically recessions, social crises and the depreciation of its currency.

Risk of violation of gaming platforms

The existence of vulnerabilities in the gaming platforms might permit the unauthorized access and/or manipulation of the gaming systems, causing losses of revenue or the leak of confidential information in the transactions.

Risk of increased electricity prices and power outages

Due to the general increase of the price of electricity and other energy sources, a risk of significant increase of the related costs and consequent reduction of profitability has been identified. In addition, a risk of electricity supply interruptions and restrictions has been identified, which could have an adverse effect on the revenues of the gaming halls and establishments in view of the impossibility to open and/or the high cost of energy, in addition to a risk of impossibility to access internal data (operational, financial, etc.).



Risk of gaming hall obsolescence

Because of the lower investments made in fixed assets (capex²⁷), the gaming halls have deteriorated over the past years, a fact that may reduce their attractiveness to customers. This effect has been aggravated by the closure of the halls during the pandemic, when maintenance work was reduced to the minimum. The group continues in any case renewed and maintaining the halls where it performs its business. The pace of realization is established in the financial plans for the year

Realized risks

In 2022, several classes of residual risks, i.e., those that remain in place after the group risk control and management procedure has been implemented, were realized. In this respect, some of the risks linked to the public health emergency caused by the COVID-19 pandemic and already identified in 2021 were realized in the year. In particular, the risks linked to the closure of establishments and halls were inevitably realized, with some collateral effects, such as a greater difficulty to retain personnel.

²⁷ I.e., capital expenditure, meaning the investment in capital or fixed assets made by a company to acquire, maintain or improve its non-current assets.



04.6 Commitment to shareholders and investors

Two major milestones marked the start of the year for Codere, the completion of its **financial restructuring** and the flotation of **Codere Online** on the US stock market.

In November 2021, Codere announced the execution of its **financial restructuring**, whereby the company reached an agreement with its creditors to inject 225 million euros into the group and capitalize over 350 million euros of debt, for the senior notes existing at the time, while agreeing a rescheduling of the debt maturities to September 2026 and November 2027. As a consequence, the operating part of Codere was transferred to a new holding company, Codere New Topco S.A., 95% of the shares of the new topco to be held by Codere noteholders, with the 5% balance held by Codere, S.A., which also received the warrants issued by the new parent.

The second major milestone, achieved also at the end of the year, was the merger of the online subsidiary of the group with SPAC DD3 Acquisition Corp. II (“DD3”), giving rise to Codere Online, which became the first online gaming operator in Latin America to be listed on the US stock market (NASDAQ). This transaction

permitted the financial resources to be reinforced to promote the online business, for it to be able to achieve its growth potential, with a strong position in a developing market. So much is this the case that, in the fourth quarter of 2022, the total revenues of the new company reached 35.6 million euros, while the net revenues on gaming were 37.7 million euros in the same period. In both cases, this represents a 70% increase in comparison with the fourth quarter of 2021.

These processes have required the organization to make considerable efforts to offer the market an **open, transparent and ongoing dialogue** on the **operating situation**, the **risks and opportunities** of the company and the **actions** carried out by the group through the various channels of communication between Codere and its shareholders and investors.



04.6.1 Main channels of communication with investors

Corporate website

Codere's website, www.grupocodere.com, offers broad and always updated information to its investors and to the market in general on the activity of the group. The website contains a specific section, *Shareholders and investors*, where the documentation required by the Spanish Companies Law and securities market legislation has historically been published.

Codere affords through its website direct access to the recording of each presentation of results. Presentations of quarterly results, and other relevant institutional and economic-financial presentations are announced in the corporate website and the persons interested are offered the opportunity to participate by telephone conference call or through the platform broadcasting the event (*webcast*).

In addition to the information provided through the corporate website, the company is in contact with its shareholders and institutional investors through the **Investor Office**, from which all consultations and requests are answered individually.

In 2022, several sections have been updated and introduced relating to the financial restructuring of the group. In particular:

- **Codere Luxembourg 2 – Operating Group:** this section provides further information on (i) ratings and issues; (ii) shares and share capital; (iii) financial information; (iv) communications.
- **Codere New Topco, S.A:** this section provides further information on (i) the Code of Ethics and Integrity; (ii) the Anti-Corruption Policy; (iii) the shareholders' private area; (iv) the shares and share capital of New Topco S.A, (v) ratings and issues

New Topco; (vi) handbook for the transfer of shares; (vii) communications; and (viii) reporting channel.

- **Codere Online:** this section provides access to www.codereonline.es for the investors to obtain further information.
- **Codere S.A en liquidación:** offers updated information on the company after the restructuring.

Investor Office

Codere offers its institutional investors and shareholders an area for the resolution of individual consultations. The group answers requests for information in a timely manner and due form, through an office at the headquarters of Codere, a telephone assistance service (+34 913 542 819) and an e-mail address (inversor@codere.com).

Codere also affords access to shareholders and investors to presentations of results and other relevant notices to the market through webcasts, telephone conference calls and the web, in addition to organizing regular informative meetings on the progress of the group and other matters of interest.

In addition, a new section was recently created in the website, *E-mail Alerts*. In this section, any person interested in receiving financial information on Codere is automatically included on the company's distribution list, after completing the subscription form. Through that e-mail, Codere sends communications to a list of institutional investors who have so requested.

In this way, the company disseminates important information, presentation dates and other news, ensuring that the principles of informative transparency, equal treatment and non-discrimination are observed. In 2022, the number of subscribers to the distribution list was over 250. Euronext is also used as a channel for the communication of relevant information to noteholders.



Codere Online has its own channel for investor relations through telephone assistance +34 91 354 28 00 and via e-mail (ir@codereonline.com), in addition to publishing in its website www.codereonline.com, all information relevant for the investor community and compulsory for the regulator (SEC), which includes a service of subscription to news and communiqués.

Webcasts and telephone conference calls

Codere offers a live webcast of the presentations of quarterly results and other notices relevant for the market, permitting the access and participation of shareholders, investors, analysts and any other person who so desires, as additional means to remain informed. The webcast remains available as a recording for one year and is accessible through the corporate website.

In 2022, more than 47 telephone conference calls were held with four quarterly conferences on results on the following dates:

- **Fourth quarter (Q4) 2021**
March 31, 2022.
- **First quarter (Q1) 2022**
May 13, 2022.
- **Second quarter (Q2) 2022**
September 1, 2022.
- **Third quarter (Q3) 2022**
November 16, 2022.

Shareholders' Meeting

The Shareholders' Meeting is the supreme body representing the shareholders of the company, and the main channel for their participation.

In turn, the General Secretary department acts as spokesperson with shareholders and vote advisers, answering their consultations on various procedures available to them to exercise their rights at the Shareholders' Meeting (particularly the rights to information, vote and representation). Also, Codere, through its Investor Relations Department within its Economic-Financial Management, is in permanent dialogue with its institutional investors and shareholders.

This department prepares public presentations to analysts and investors of the quarterly results, meeting requests for information and organizing meetings and telephone conferences with stakeholders, always ensuring the transparency, consistency and homogeneity of the information.

In 2022, four shareholders' meetings were held at which the shareholders agreed to appoint the proposed directors, the external auditor of the company and its group and of the statutory auditor of the company. The bylaws were also amended to allow the appointment of Co-CEOs or to set the aggregate remuneration of the Board at 1.4 million (see section 4.2.2.).



04.6.2 Achievement of targets for 2022

To give continuity to the initiatives implemented in the context of its shareholder and investor relations, the group set the following targets, which it has accomplished:

- Continue generating stable and solid relations of trust with each of the company's stakeholders.
- Continue to comply strictly, in a timely manner and in proper form, with the communication and reporting obligations towards investors and shareholders.
- Continue complying with the principles of transparency, veracity, immediacy and homogeneity of the information.
- Continue reinforcing the investor community's trust.

04.6.3 Main targets for 2023

With a view to 2023, to continue the initiatives implemented in the context of its shareholder and investor relations, the group has set the following targets:

- **Convey a clear and convincing message to reinforce credibility among the investors** in order to improve their understanding of the business and identified opportunities.
- **Implement a plan of meetings with investors**, attending conferences, holding investor days and making visits on site.
- Work on an **informative and professional website**, with a solid section on investor relations, for investors to be able to use the group website to receive information on the main news of the company.
- Carry out a **perception audit** to know the impressions of former, current and potential investors and thus acquire in-depth knowledge of their perceptions.
- Maintain a **firm time schedule** to offer an image of sound organization and thus maintain the trust of the market.



04.7 Transparency

Transparency is one of the core **values** of Codere's culture, the cornerstone on which the action of each professional of the organization rests.

The large number of channels of communication with the various stakeholders enabled by the company through which publishes the most relevant milestones of the group, both internally and externally, clearly, completely and regularly, are good proof of this.

Particularly to be pointed out is the company's **commitment to tax and accounting transparency**, regularly reporting complete, accurate and true economic-financial information of the group, meeting the applicable generally accepted accounting principles and international financial reporting standards.

In this respect, in 2022, Codere continued to develop specific procedures to control eventual **accounting inconsistencies**. In particular, the company has continued to opt for implementing automation systems and controls to block the programs loading the operational information into the accounting system, contributing to the reinforcement and permanent improvement of the tools available to the group to avoid cooking the books.

The organization also has an **Anti-Fraud Committee** to prevent conduct contravening the regulation in force in each market. (See section 04.2. Compliance).



04.7.1 Pillars of the tax control framework of Codere

Codere Group, within its corporate governance system specific for tax matters, has a **tax control framework** that defines the **principles of action** relating to tax risks, based on the following pillars:

- Creation of a **Corporate Tax Management** to which the teams responsible for compliance with tax obligations in the various regions in which the company operates report. This management is also responsible for the group's actions in tax verification and inspection proceedings instituted by the tax authorities in the various jurisdictions.
- The **Corporate Tax Policy**, approved by the Board of Directors, including the group's principles of responsible business in tax matters.
- Information and reporting to the Board of Directors of the main **tax risks** that may affect the company, in view of their complexity or impact on profit.
- Compliance with the **procedures for internal control** and tax risk management of the group.

The group's tax strategy is approved by the Board of Directors and is in line with the group's **principles of responsible business** in tax matters.

Codere also responds to the increased demands for tax transparency of the various stakeholders, meeting constantly improving standards in the quality of the public tax information made available by the group.

04.7.2 Corporate Tax Policy

Codere has a **Corporate Tax Policy** in place which establishes the main guidelines for the group to make decisions and take actions on tax matters. This policy responds to the following commitments:

- Compliance with tax law in force in the various countries and territories in which the group operates.
- Making of decisions on tax matters on the basis of the reasonable construction of applicable law and in close relation to the activity of the group, in line with the OECD BEPS action.
- Encouragement of relations with the authorities based on trust, good faith, professionalism, cooperation, loyalty and reciprocity, without prejudice to any lawful dispute that, respecting the above principles and in defense of the corporate interest, may arise with the authorities on the interpretation of the legal provisions applied.
- Not to incorporate, or acquire shares in, companies with their head offices in countries or territories considered to be tax havens, unless reviewed and otherwise expressly decided by the Board of Directors for business reasons.

The *Corporate Tax Policy*, like the rest of the components of the corporate governance system, is subject to constant review. In this regard, Codere takes all steps necessary to remain permanently adapted to the constant changes in the environment, taking into account the volatility of tax laws (particularly in the gaming industry) and the increased requirements for transparency in tax information.

“Codere complies stringently with tax law, regularly reviewing its tax policies to improve its processes”



04.7.3 Main targets for 2023

In 2023, Codere will continue to reinforce its commitment to **integrity** and **transparency** by implementing the following projects:

- **Project for external review of tax risks**

The identification of tax risks is a matter always in progress. The Corporate Tax Management will thus promote and coordinate an annual review by external advisors in which the potential risks will be identified and updated, implementing new measures or reinforcing those already in place, to mitigate the risks.

- **Project to obtain a second external opinion on the probabilities of prevailing in tax lawsuits in progress**

The Corporate Tax Management will promote and coordinate the obtaining of a second legal opinion to assess the probability of prevailing in those tax lawsuits that are in progress.

- **Project DAC6**

Due to the entry into force of Council Directive (EU) 2018/822 of 25 May 2018 as regards mandatory automatic exchange of information in the field of taxation in relation to reportable cross-border arrangements (the “**DAC6**”), the group has developed a procedure to detect and report systems subject to notification.

The DAC6 has the purpose of allowing the tax authorities to react fast to potentially aggressive tax practices, approving rules to fill the gaps in the law and, failing this, to focus their inspection efforts on the areas of risk.



Social commitment

05

05.1 Safe gaming

Codere has continued this year to add its efforts to continue and strengthen its **Social Corporate Responsibility and Responsible Gaming Plan**, approved in 2020, in order to go on offering the best entertainment transparently and responsibly, with all safeguards and reducing to the minimum any undesired impact of the gaming activity.

This ambitious plan, prepared after analyzing the needs and expectations of the various stakeholders in the company, determines the position of the organization in respect of a set of key matters:

(1) Regulation of advertising
(2) Planning of gambling premises
(3) Gaming access control
(4) Image of the industry
(5) Management of vulnerable groups

1. Regulation of advertising

Codere understands that a deficient regulation of commercial communications on gaming could give rise to overexposure of the offer, with potential damage to vulnerable groups and causing unnecessary concern.

The company defends **gaming advertising restrictions based on objective policies, regardless of whether the operator is public or private**. For the purpose, Codere proposes various measures, among which the following are pointed out:

- Implement regulations making the public interests compatible with the sustainability of the operators.

- Send clearly identified, recognizable and true commercial communications, which must never be sent to minors.
- Offer promotions ensuring that the game dynamics are not misleadingly changed and that the information is clear and transparent.

2. Planning of gaming premises

Codere defends a **regulation that organizes the setting up of business premises, their size and the types of games that may be offered at them**, for the purpose of reasonably reducing the rates of problem gaming, always provided that this does not affect investments and operations already established.

Codere thus proposes that the gaming supply be regulated clearly and expressly, imposing measures for the healthy development of the industry, such as classifying business premises by size and type of game and limiting the number of premises on the basis of demographic studies.

3. Gaming access control

Codere is a pioneer company in **gaming access control processes**, affording groups at risk full protection in all territories.

The company applies a policy of **zero tolerance of underage access to gaming** and ensures that access to gaming is restricted to citizens recorded as **banned or self-banned on the register of gaming access bans**.



4. Image of the industry

Codere is well aware that the current concern about gaming in certain markets is the result of the dissemination of unfounded myths that deteriorate the public view of the industry.

In view of the situation, the company has made the strong **commitment to dignify and shed light on the industry**, conveying the truth to the markets and the company.

- Para ello, Codere colabora activamente con los reguladores de todos sus territorios para el desarrollo de los marcos regulatorios más garantistas para el usuario, las administraciones públicas y las empresas.
- Asimismo, Codere impulsa la **elaboración de estudios sobre el juego de azar**, y colabora con las patronales de juego para acercar a la sociedad una realidad de la actividad basada en cifras. Con ello, se busca variar una percepción social sustentada en el desconocimiento del sector.

5. Management of vulnerable groups

Codere has always been committed to safe commitment and to the protection of minors and users with problem behaviors. It thus permanently analyzes and implements responsible gaming measures, to ensure the best protection of these groups.

To continue reinforcing this achievement, Codere has a Responsible Gaming Measures Plan, forming part of the **Corporate Social Responsibility and Responsible Gaming Plan** based on four pillars:

(1) Prevention
(2) Awareness
(3) Detection of risky behavior
(4) Management

1. Prevention

Codere implements various prevention measures, including:

- *Authorized Gaming*, an online section that provides information on licenses and authorizations, and *Responsible Gaming*, a section providing access to public sites.
- Setting up systems to verify the age of the players and clear indication of the 'ban on underage gambling' in the access to its offer.
- Control of advertising messages and commercial communications.
- Access by users to their behavior history.
- Offer of information on specialized problem gambling entities and promotion of campaigns and initiatives to encourage safe and responsible gaming.



2. Awareness raising

Codere regularly publishes information on responsible gaming, to raise **awareness in the users** of the importance of adequate gaming behavior and to **dignify the industry** in the light of its real figures. Internally, Codere implements programs to train and raise awareness on the matter in its personnel.

3. Detection of risky behavior

Problem gambling is an individual condition, not a social one. Accordingly, Codere proposes to establish procedures and protocols to permit risky behavior of users to be detected in its online and retail offer, minimizing the risks and protecting the vulnerable groups.

To this end, Codere takes into account objective policies that reveal activity habits to identify cases of problem gambling. For the purpose, in 2020, Codere started to develop its **RPC prevention and control platform** which, in online gaming, uses artificial intelligence (AI) to define algorithms to identify risky gaming behavior, developing a predictive analysis that enables problem gaming to be identified before it starts.

The tool, assessed and presented in 2021 to the Spanish General Gaming Directorate (*Dirección General de Ordenación del Juego – “DGOJ”*), was finally developed and tested in 2022, to be implemented in the entire online business of the group.

In the retail context, Codere’s risky behavior strategy is based on **training the gaming hall employees and subsequently observing the customers** using physical behavior and motivational indicators.

4. Management

Once it has identified risky behaviors in its customers, Codere manages the risks from a global point of view, taking into account the channel in which the activity is being performed. If a user is detected who may be developing a risky behavior, the company puts that user in touch with the customer telephone service, which provides assistance and offers information on responsible gaming, in compliance with the regulation applicable in each territory.

“Codere offers an entertainment surrounding with all safeguards for its customers, minimizing any undesired impact”



05.1.1. Global commitment, main milestones

Codere seeks the protection and health of its customers, respecting and complying with the rules and assuming voluntary codes for safe and responsible gaming. The company provides its customers with information constantly, allowing them a more reasonable and responsible consumption of the gaming supply. Specific protection procedures are also established for vulnerable groups and ongoing improvement of the operation is encouraged with the implementation of the **best safe and responsible gaming practices**.

The company seeks to raise emotions in those who choose an entertainment experience based on betting in a safe surrounding. To be betting, emotion, fun, excitement, closeness, safety, trust and social commitment!

This responsible gaming commitment of the group also encourages the development of specific global actions, such as:

- The **International Responsible Gaming Day** which, since 2008, at the proposal of the EGBA (European Gaming and Betting Association), is celebrated on February 17. On the motto “If it is not responsible, it is not a game”, Codere joins the celebration of a day that encourages not also reflection on the activity but also discussion of the regulations. This is done through internal and external actions (documentaries, awareness campaigns, primary prevention guidelines, promotion of health in relation to games of chance, etc.).

An example of these campaigns is **Responsible Gamer** which seeks to convey the ‘fun’ experience offered in gaming, disseminating the **responsible gamer decalogue** in the various halls, for customers to ensure that they enjoy this experience of entertainment.

- At the global level, the company has continued in 2022 to provide **specific training on Responsible Gaming**, targeted to the group as a whole. This training will be constantly updated by Codere given the relevance of the matter and nature of the business.



05.1.2. Local commitment

In addition, in 2022, Codere has carried out a series of actions for safe and responsible gaming in each of the countries in which it operates, adapting to the situation of each one of them:

Spain

Codere plays a leading role as member of the **association of gaming enterprises CEJUEGO** (*Consejo Empresarial del Juego*), which represents approximately 70% of the private gaming industry in Spain. In line with the sensitizing and awareness raising contemplated in the Corporate Social Responsibility and Responsible Gaming Plan, the company remains proactive in all the initiatives undertaken by CEJUEGO, among which the following must be pointed out this year:

Preparation of the **Anuario del Juego en España 2022 (2022 Gaming in Spain Yearbook)** (eleventh edition), with a data analysis showing an industry that employs, directly, 84,547 people, more than 47,250 of whom work in the private gaming industry and, indirectly, gaming generates 175,000 jobs, most of them (more than 50,000) in the hospitality industry.

The yearbook also notes that the industry paid 958 million for special gaming tax and duties, and 733 million for ordinary taxes and social contributions, only in retail gaming. Finally, the authorities collected a total 1,354,9 million euros from the industry.

This year the **Juego y Sociedad 2022 (2022 Gaming and Society Report)** (thirteenth edition) was published, pointing out among its conclusions that 82.4% of the Spanish adult population has gambled in the year, a rate that has dropped by 3.03% in comparison with the usual figures, thus corroborating the reasonable behavior of customers of entertainment gaming.



As a novelty this year, **both publications were presented at the headquarters of the Spanish Confederation of Employers' Organizations (Confederación Española de Organizaciones Empresariales –“CEOE”)**, attended by the media, opinion leaders, authorities and players of the industry, to know the true situation of the industry, with no filters.

Codere España has also contributed to the dissemination of other reports and conferences to dignify the industry, such as the virtual inter-region day organized by the Dual Pathology Foundation, held on June 17, 2022, to raise awareness, through several medical practitioners, of the gambling disorder from a



scientific point of view focused on prevention, information and treatment.

Codere also completed and tested this year the **RPC (risk prevention and control) platform**, to identify risky behaviors of users in the online context, for due prevention and control purposes. The company is already developing and expanding this tool at the global level, for it to be implemented in the group as a whole.

Additionally, Codere España forms part of major associations of the industry²⁸ such as **Jdigital** (Spanish online gaming association), forming part of its Executive Board, whose main purpose it is to safeguard the interests of the online gaming industry in Spain and promote a regulation permitting its sustainable development affording users the best protection. The company also forms part of **Autocontrol** (Association of self-regulation of commercial communication) and of **CONFAD** (national committee to combat the manipulation of sports competitions and fraud in bet), a body attached to the Ministry of Finance, to prevent and eradicate corruption and manipulation in sports competitions and bets, Codere España forming part of the plenary of the committee.

At the regional retail gambling level, Codere has continued to implement the **Social Responsibility Accreditation Plan of COFAR** (*Confederación Española de Empresarios del Juego Recreativo en Hostelería* – Spanish Confederation of Recreational Gaming Enterprises in the Hospitality Industry), for development of a quality seal as an instrument to certify hospitality establishments, for their commitment to social responsibility and, in particular, to responsible gaming. Throughout 2022, Codere has focused its efforts on verifying its implementation at the points of sale.

Also, Codere together with Luckia and Sportium created the Association of Betting Licensees of Castilla y Leon (*Asociación de Licenciatarías*

de Apuestas de Castilla y León –“ALACA”), at the end of 2021, presented at the beginning of 2022 and presided over by the company. The main purpose of this association is to launch campaigns on sports bets, promote responsible gaming policies and cooperate with the local responsible authorities for the responsible and sustainable development of the industry.

In 2022, the Association of Betting Operators of Valencia Region (*Asociación de Operadores de Apuestas de la Comunidad Valenciana –“AEVA”*), also presided over by Codere, was organized.

Italy

This year, Codere Italia continued to **promote responsible gaming** in the country, through its veteran program **“In nome della legalità”**, an itinerant workshop that, since 2011, roams the territories where the company is present in the country to create a meeting point for the industry and encourage the well-founded discussion of its main problems. Over the years, it has become an essential forum to share notions on legal matters and responsibility with the authorities and institutions, for better decision making and providing greater knowledge of the industry. The edition this year took place in Parma in November.

Codere Italia maintains a fluid and permanent relationship with various **organizations and regulators of the country** (Sistema Gioco Italia/ Confindustria SI, EGP Associazione italiana Esercenti Giochi Pubblici and ADM Agenzia Accise Dogane e Monopoli, among others), to promote the best gaming practices and an orderly regulation of the industry.

Throughout 2022, Codere also kept active its project **Codere Training**. This online training platform is free for all gaming operators connected to the *Codere Network* and covers relevant issues such as problem gambling, risky behavior player profiling and actions to prevent

²⁸ In summary, Annex III Associations or sponsorship actions of this report contains a table showing all specific sector associations with which Codere cooperated in 2022, and other entities with which it has cooperated for social purposes or sponsorships.



risky behavior, without forgetting the regulatory aspects of legal gaming.

In addition, the employees of the halls of Codere Italia participated actively throughout the year in the **specific training and courses** given on responsible gaming, in compliance with regional legislation in force.

Codere Italia SpA, together with its subsidiaries **Codere Network y Operbingo**, recently obtained the **legality qualification from the AGCM** (Autorità Garante della Concorrenza e del Mercato/ Italian Competition and Market Authority). This is an innovating tool developed by the authority in cooperation with several ministries, which recognizes the highest standards of legality and transparency of enterprises that meet a series of requirements, both regulatory and non-regulatory and voluntary.



Some of the requirements to be pointed out are those relating to corporate risk management, corporate social responsibility, sustainability, corruption prevention, customer care or payment traceability, among others. The obtaining of this certificate represents the consolidation of the values and principles of Codere's ethical standards and demonstrates its culture of compliance.

Thanks to the initiatives undertaken over the years to encourage responsible gaming and foresee future regulatory obligations, Codere is considered a leader in the matter and an inspiration for competitors and institutions.

With a view to 2023, the company plans to certify the Responsible Gaming Plan internationally with **G4 (Global Gambling Guidance Group) for Europe**, a certificate that will recognize the responsible gaming policies and action plans of the group. This will doubtless provides certainty of the commitment and responsibility of the organization with a positive impact at the corporate level.

Argentina

Throughout the year, Codere Argentina has strengthened its commitment to prevent and respond to problem gaming behaviors by offering **training on responsible gaming** to all its collaborators, particularly those working at the halls.

Also, several **informative awareness raising actions** have been taken at the halls under the umbrella of the program "Cuando el juego no es juego" (When gambling is not a game). This program disseminates preventive and awareness campaigns (through screens, brochures, notices and channels of communication) accessible at the various premises, recommending that a leisure experience be enjoyed based on responsible gaming.

Also, in 2022, **counselors are again present at the halls**, an action suspended during the pandemic due to the strict protocols that limited the number of occupants at the premises. Thanks to this reactivation, it again has counselors and psychologists, on rotating shifts, that offer primary care to customers and family relatives at the halls, also informing them of the places where they may receive more specialized assistance.

Open door days with the public institutions have also been organized to bring the regulator closer to the real situation of gaming in Argentina. For years the company has been working closely with the Instituto Provincial de Lotería y Casinos de la Provincia de Buenos Aires, which manages the gambler assistance and prevention centers that treat gambling disorders.



Of the eleven centers that provide these services, two of them, located in Morón and La Plata, use premises assigned to them by Codere. Psychologists specialized in immoderate gambling work at these centers and visited the group's halls to know how the prevention plans are implemented on site, always to prevent and give guidance to prevent inadequate behaviors.



Because these open-door sessions were very well received at the institutional level, Codere plans to hold similar sessions with journalists and other regulatory bodies and institutions.

In addition to these actions and projects, on the **International Responsible Gaming Day**, Codere Argentina not only encourages its own support actions but also joins the initiatives that the regulator promotes nationwide.

Finally, the company maintains its framework cooperation agreement with **Fundación Padres**, a foundation that has been raising awareness for more than two decades on the importance of the parental role on responsible gaming in adolescents.

Codere Argentina's commitment to responsible gaming has been recognized, for the second consecutive year, with the award of the **Prize to the best CSR strategy of LATAM 2021**, delivered at the SAGSE 2022 Trade Fair.

Mexico

In 2022, Codere México continued to afford **training on responsible gaming** to its collaborators –particularly hall personnel–, to reinforce their knowledge and awareness. It also worked on conveying the responsibility messages to its customers, with reminders at all the gaming halls and at the Las Americas Racetrack, in addition to disseminating the content through the social networks. With a view to 2023, the company intends to reinforce the specific training afforded on the matter.

Uruguay

In this business unit, one of the main milestones achieved in responsible gaming was the completion of a cooperation agreement with the **Uruguay Psychologists Network**, a free primary healthcare line providing these services available at Casino Carrasco.

Through this cooperation, gamblers who recognize any problem gambling episode on the premises have the opportunity to be assisted by specialized psychologists immediately. The purpose is to raise awareness and provide professional support to customers who need it, beyond the assistance offered by the hall staff, also trained in responsible gaming.

Also, in the year the **specific training in responsible gaming** plan started in 2021 was continued, reaching all collaborators, with online training especially targeted to hall and operational personnel. With a view to 2023 it is expected to complete reinforcement training with the support of the Uruguay Psychologists Network.



Panama

Codere Panamá continued firm in its commitment to performing responsible gaming activities, encouraging in-person and online training activities through the ‘Espacio Positivo’ platform.

In particular, in 2022 **specific training was afforded on problem gambling** to around 250 collaborators, including casino agents, middle managers and operators, to raise awareness on the matter.

Simultaneously, the company continued to cooperate with the most relevant institutions in the country, such as the Gaming Control Board (**Junta de Control de Juego –“JCJ”**), responsible for controlling and regulating the operation of games of luck and of chance. It has also continued to cooperate with the Financial Analysis Unit (**Unidad de Análisis Financiero**) and the Superintendence of Non-Financial Subjects (**Superintendencia de Sujetos no Financieros**), national bodies responsible for collecting and analyzing financial information and supervising non-financial obligors, for the prevention of money laundering, of terrorist financing and of the proliferation of weapons of mass destruction, in compliance with the prevention framework and the recommendations of the international bodies on the matter.

In addition, this year, the agreement with **Cruz Blanca**, an entity engaging in offering free assistance to any collaborator who may need support for mental health reasons, was maintained.

Colombia

In 2022, after the new regulations implemented by the local regulator, Coljuegos, Codere Colombia redoubled its efforts to complete the development of a responsible gaming strategy that, in the context of the **Corporate Social Responsibility and responsible Gaming Plan**, meets the regulatory requirements at the local level, adapting its operating procedure to this strategy.

This business unit has also continued to afford **training on responsible gaming**, to reinforce the specific skills at gaming halls, and has made progress in its various for mental health alliances.



05.2 Responsible with the community

Codere, in its vocation to ensure sustainable and responsible growth, committed to social development, distributes part of the profit on its business to the local communities in which it operates, through social initiatives that respond to the community needs and improve the organization's relations with its stakeholders.

Also to be pointed out is the relevant contribution made by the organization to the socioeconomic growth of its markets:

- **Generating quality employment:** in 2022, Codere's workforce consisted of 11,046 employees, 95% employed on a permanent basis.
- **Cooperating to sustaining the local treasuries:** the group contributes to develop a responsible gaming supply, with all safeguards for players and governments, maximizing the tax collection by the public authorities. This year, the company contributed 629.6 million euros in taxes, 386.1 of that amount for special gaming taxes.
- **Working to reduce the environmental impact of its activity:** by saving electricity, reducing CO₂ emissions and ensuring a correct waste management, as the key issues²⁹.

²⁹ The environmental policies and actions are further developed in Chapter 6.1 *Respect for the environment*.



05.2.1 Social initiatives

Codere promotes its own initiatives and supports third-party plans with objectives in line with those of the organization, such as the promotion of education and culture, support of vulnerable groups and integration of persons with disabilities, deploying its social action over all the territories where it performs its business.

'Banco Rojo', a symbol against violence

Codere continues its **Banco Rojo** (Red Bench) project. Through this global project, various actions have been implemented to raise awareness and promote a culture of respect for women, targeted both to collaborators and to customers.



Under the motto "Violence is never love", on November 25, **International Day for the Elimination of Violence against Women**, the company held simultaneously at its own gaming halls and workplaces, an act of remembrance of the victims, placing symbolic red benches and notices. Bunches of red roses were placed and the poem "Nunca te detengas" (Do not ever stop) by Mother Teresa of Calcutta was read. Informative brochures with the contacts of the local networks organized to help women were also delivered, to support them in reporting and preventing abuse.

The group's commitment to women is also reflected in its **Equality, Inclusion and Diversity Policy**, and in the **Protocol to prevent, respond to and eradicate violence at work**.

This year, Codere has also implemented various women leadership actions to improve women's presence in the organization.

Humanitarian aid: Ukraine, Turkey and Syria

Against the invasion of **Ukraine**, Codere took three initiatives, implemented in Italy and in Spain, committed to this cause and facilitating the cooperation of employees and customers by the hand of NGOs, to contribute to mitigate the **humanitarian emergency** of the country through economic donations, receiving war refugees and with solidary games played at the bingo halls in Europe.



Codere equaled the contributions made by the employees and afforded economic aid to those of its collaborators who decided to receive refugees in their homes. Also, for employees in Italy, advice and support was received from **Cáritas de Latina**. As a result, three refugees were received, EUR 3,284 were collected and EUR 9,360 were obtained in the solidary games, the full amount having been delivered to **World Central Kitchen** and **Messengers of Peace**.



Solidary aid also had to be activated to face the earthquakes that struck the southeast of **Turkey** and the northwest of **Syria** on February 6, 2023, with the collection of clothes, basic necessities and non-perishable food delivered through Turkish Airlines to the affected people.

In Madrid solidary bingos were organized on February 17 and 19, delivering the full amount to **World Central Kitchen**, which is already acting in situ. Other business units, for example Italy, Mexico and Colombia, have also supported the earthquake victims.

05.2.2 Solidary initiatives in our geographical locations

Beyond the initiatives taken at the corporate level, the different countries in which the group is present carry out various actions to respond to the needs of the local communities, with some of which Codere has been cooperating for years. The company donated around 80,000 euros to different causes, although it increased its cooperation in kind and other aid. The most relevant of 2022 include:

Spain

The company cooperates with **Fundación Prodis**. In this foundation, two managers from Codere participated as spokespersons in the master courses of the Empresa Program, linked to the Autonomous University of Madrid. This is the first master degree granted to people with intellectual disabilities who wish to receive training in the business world or to retrain to adapt to a new working environment. The program combines theoretical training and practical working experience.

Codere España has also cooperated with **Llamada Solidaria**. This NGO collects obsolete cellular terminals to contribute with their sale to projects on rare diseases, including from investigation to support of the family of the patients. In 2022, approximately 85 kilos were collected including cellular phones, batteries, IMEIs, packaging and other materials.

When the areas of the head office were renovated, the furniture of the offices was offered to the employees in Spain at no cost, thus supporting the provision for teleworking. A large part of the furniture (chairs, desks and cupboards) was donated to various groups such as the **Fundación Kivo Jambo**. Equipment was delivered to this foundation, for schools and other centers in the Republic of the Congo. Material was also distributed to **Stella Maris** College, which received furniture for its classrooms and to **Asociación Remar**. This association collected equipment for several shelters.



Italy

Codere Italia implements several actions to assist groups at risk and cooperates with associations together with employees and customers. It has launched several campaigns for the sale of articles and food (such as mini panettone or easter eggs) and direct donations in charity boxes at the halls and offices of the company.

The group renewed its commitment to scientific investigation through its cooperation with the **Telethon Foundation**, which engages in financing the investigation on rare genetic diseases, and with the association **Io, Domani** (Me, tomorrow), to fight against childhood cancer

This year it also renewed its commitment with **Bea a Colori** (www.beaacolori.com), an association founded at the end of 2020 by a former collaborator with the group, in order to assist families and loved ones to face the treatment of heart disease with greater awareness and serenity.

In the context of equality and to support women, to be pointed out is the cooperation with the **Villa Gaia Foundation**, which offers a solidary and self-sustainable place for mothers victims of violence, and with the **Eva Cooperative**, which has five centers and three shelters for battered, trafficked or refugee women.

Codere Italia has also maintained the **Innamòrati di te** (Fall in love with yourself) campaign, a cycle of itinerant conferences, promoted by the company, broadcasted by YouTube encouraging women to love themselves and make themselves respected.

Argentina

Codere Argentina has been contributing since 2019 to the **Programa de Vinculación Comunitaria (Community Involvement Program)**. This year, on Children's Day, the company made donations of sweets and products and, to support the school start,

300 school kits were delivered to the social organizations of the areas of the gaming halls, contributing to provide the most vulnerable families with means. The group also contributed materials to build the first classroom of the infants' school of the **Morón Sports Club**.

The company also participated in the inauguration of the first entertainment and sports facility of the **PUPI foundation**, created by former football player Javier Zanetti and engaging in the integrated protection of the rights of minors, paying special attention to the development of the most vulnerable groups.

At Christmas, Codere cooperated with various social institutions donating food and supported neighbor associations and small-size local enterprises promoting the development of the community and supporting their procurement as suppliers. Thus, through nine halls in Buenos Aires Metropolitan Area, the company cooperates with small-size businesses which it commissions with various forms of work (such as the production of dominoes, rakes, pokers, wooden planks, the benches of the Banco Rojo campaign, etc.). This is the case of the La Reserva and Las Pibas **social carpenter shops** that assist in the development of people training in this profession, for them to find a decent way to work. It also supports **other businesses**, such as Pura Vida, a bakery created by unemployed neighbors of the area, which offers employment to more than ten families in Lanús.

Also, this year, the company financed the annual dinner of the **Padres Foundation** (an association engaging in raising awareness on responsible gaming in families with adolescent children, among other matters), donating 10 kits of product prepared by entrepreneurs of the social economy of the Community Involvement Program. The local Corporate Social Responsibility team will concentrate its efforts on this project in 2023, not forgetting the rest of the programs launched.



Other actions must also be pointed out, such as the support to the **Caritas picnic area**, which provides food and school assistance to over 200 families in a vulnerable situation. Also, the cooperation, for four years, with **Alma Mía**, an entity that helps youth with disabilities using equine-assisted therapy, a treatment that uses horses as therapeutical support in physical and mental illnesses.

Finally, as a result of its career, Codere Argentina has collected for the second consecutive year the award to the **'Best CSR strategy of Latin America 2021'**, delivered at the SAGSE 2022 trade fair.

Mexico

Codere México has reinforced its relations with the municipality of Huixquilucan de Degollado, Mexico State, by increasing the donations to the system for **Integrated Development of the Family (IDF)**. With these donations, the company contributes to ensuring better conditions for many children of Mexican families.

Codere also promoted women's football through a donation to **Serendipia Digital**, an independent journalistic initiative developing notes, reports and tools of gender violence, human rights, discrimination, environment, corruption, criminality or lack of transparency. With this donation, Codere helps to close the salary gap based on gender differences.

The company also took one step forward in its support of women's football through the donation, from the collection of bets on this sport, to **She Wins**, an NGO supporting women's empowerment through sports and education in the context of the "#CodereConEllas" campaign.

The company is planning several social responsibility projects for 2023, including the cleaning of the Desierto de los Leones wood, together with the Mayor of Cuajimalpa; the agreement with **Sensoria**, a foundation that

affords therapy to differently abled children; and the cooperation with the Government of Mexico to promote a campaign against **violence against women** in Nuevo León.

Uruguay

In education and employment matters, the company retook in 2022, after the interruption during the pandemic, its training project of **La escuela de jockeys y vareadores (School of jockeys and trainers) (7th promotion)** at the Las Piedras Racetrack, one of its objectives being to contribute to professionalizing equestrian work, since no career as such exists for this activity in the country.

This training action also educates other students in other skills that will help them through this hard career beyond the purely technical issues, since students start very young and without experience. Some of them keep their scholarships and live at the facilities where they complete their training.

Also, on January 6, 2022, the National Racetrack of Maroñas held the most important race of the turf in Uruguay, the **'José Pedro Ramírez Gran Prix'**, that held its 125th edition this year. This race affords an excellent working opportunity for the younger. This year, the Maroñas management team received 161 young people (115 women and 46 men, between ages 18 and 24), who joined the working teams of the premises as cashiers, salespersons, hosts and stockers, thus contributing to the preparation and success of the event.

Also in the horseraces context, Codere Uruguay promoted the project to **achieve "sportsperson" status for jockeys in 2023**, for which contacts are being made with the National Sports Secretariat of Uruguay, in agreement with the jockeys.

In **animal wellbeing**, throughout the year, the company promoted an internal work team to disseminate the work and good practices applied when working with animals at the racetracks. Along these lines, among other activities, school visits to



the racetracks are being organized for children to know firsthand how the animals are treated and cared for with all safeguards, in addition to the activity performed at these premises.

The business unit also continues to support the **centers for assistance to children and families (centros de atención a la infancia y la familia –“CAIFS”)** in the areas of the racetracks of Maroñas and Las Piedras, working to ensure the protection and promotion of children’s rights, preferentially assisting poor and/or vulnerable families. To that end, the company affords ongoing institutional support and bears the cost for the maintenance of related public premises.

Codere also lent the gym of the polyclinic of the Maroñas Racetrack to provide specific assistance in and local rehab treatments and health issues

Panama

Codere Panamá, through the ‘**Codere te da la mano**’ volunteers program, implements several solidary campaigns including among other initiatives supporting colleagues in complicated situations (for lack of economic resources, family, etc.).

Also, at Christmas, the team of volunteers accompanied and brought joy to children of limited means. One of these activities was carried out in Bella Vista, in the Capira corregimiento, a community difficult to access in the West Panama province.

In the field of education, Codere Panamá continued this year its **Plan to support students of limited means** (aid for dormitories adapted to the students of the jockey’s academy), for them to be able to receive training while living independently. In December, ten young jockeys of the 2022 promotion of the Laffit Pincay Jr. Technical Academy for the Training of Jockeys, were graduated from the school as turf professionals starting their career at the Presidente Remón Racetracks at the races held on Mother’s Day.

The company has also reassumed its cooperation agreement with the **Instituto Panameño de Habilitación Especial** (Panama institute for Special Training –“IPHE”), made in 2021, for the integrated and accessible rehabilitation of children and youth with disabilities, from the east area of the city, through equine-assisted therapy. Codere expects to reassume this activity in 2023.

Through the **Club Kiwanis in Chiriquí**, in September, disposable nappies were collected from among collaborators of all the halls, which were donated to the Maternity and Children’s Hospital for families with limited means of this province.

In the field of **animal wellbeing**, Codere Panamá lent the facilities of the Riande Hall to sterilize pets (dogs and cats), a very welcomed initiative taken in April.



In 2023, Codere Panamá **promotes several family leisure activities** among the collaborators, such as the comet competition “Cielo de Colores” (Coloured Sky) at the Presidente Remón Racetrack.

Colombia

With a view to 2023, the company will focus its efforts on completing alliances with mental health entities and recover its support to the **Colombia Chiquita Foundation**, by donating non-perishable foods and toiletries to the underaged in danger or abandoned.



05.3 People, the driving force of change

05.3.1 Committed to our employees

Codere considers the strategic management of its human team essential for the company's success. In view of this, the People Department works permanently on attracting, retaining and developing the best talent, based on the corporate culture and with the support of IT tools and online processes.

The **Code of Ethics and Integrity** provides the main framework for collaborator relations. It establishes the basis of action for the daily activities, and for the implementation of its policies and procedures. Under this code and through the **Employees' Corporate Social Responsibility Plan**, the group develops and implements the various policies, procedures and actions to ensure the best possible working environment for all collaborators, at each of their working stages, regardless of their age, gender, race, culture, creed or sexual preferences.

In addition, Codere opts for technology, innovation and operating excellency as competitive advantages, positioning itself as an attractive company in the industry for the best talent. It also retains the best professional profiles by encouraging the leadership, training and professional development of its collaborators. This implies promoting team work, equality, inclusion and diversity, work-life balance and wellbeing, and occupational risk prevention.

Employee profile³⁰

Codere's workforce is made up of a total **11,046 employees**, representing a 4% increase in respect of 2021.

Its workforce is made up of 59% men and 41% women. Most of the collaborators are of ages between 30 and 50 (66%).

In terms of geographical distribution, Mexico, Argentina and Spain concentrated 68% of the workforce in 2022, with the rest of the collaborators distributed among the other four markets of the group and the corporate headquarters.

By professional groups, the workforce is made up mainly of operators (59%), middle managers (17%) and technical staff (18%).

Lastly, as regards type of contract, 95% of Codere's workforce was employed on a permanent basis. In respect of working time, around 88% of its employees work full time.

Codere employee profile

- 95% under employment contract.
- 88% under full-time contract.
- 41% women
- 59% men.

³⁰ The distribution of the workforce is further discussed in Annex II. *Breakdown of Human Resources indicators.*



Main milestones achieved by Codere in People in 2022

In 2018, the company commenced a **Transformation Plan** to provide a global response to the new challenges of the industry, encouraging the company’s potential, making it more competitive and enabling it to adapt fast to an also changing surrounding that is becoming more global and digital day by day.

In 2021, the People Area made progress in adapting and implementing a new model for the company’s structure and operating procedure, based on a single management and integrated function, with a decentralized vertical structure in the countries and with the support of global and local specialized facilities.

This new model has made the company evolve towards a more “liquid” organization, in which the central function of management is economic strategy, planning and control, supervision of the operating quality of the projects and initiatives and promotion of the corporate responsibility of the employees.

The adaptation process was supported by two internal levers:

Master Plan <i>One People</i>	Codere Personas <i>Digital Cornestone</i>
Designed to support the transformation of the people area towards a single integrated unit	Para el impulso de la digitalización.

This has also been a transition year for the area, with Jaime Jordana joining us as new corporate officer. This starts a new state in this function, its main challenges including talent management at the core of the strategy for transformation and reinforcement of the employer brand image of the company, for us to be able to attract the best professional profiles in the market.

One People Master Plan

The One People Master Plan is an ambitious unification, globalization and digitalization project. It is also intended to improve the efficiency of the most important talent management functions, including both retention and commitment, and motivation and development. It also refers to matters such as employees’ corporate social responsibility, the improvement of Codere’s image as an employer and employee experience.

Strategic lines of <i>One People</i>	
Integrity and transparency	Promote the culture and values through our actions in the organization as a whole.
Customer centricity	Improve customer experience through a stronger motivation and commitment of the employees
Efficiency	Increase the flexibility in the organization, reducing costs and structure to improve efficiency
Technological innovation	Digitalization and automation of the area function processes.
High performance teams	Improve management skills, identify and retain key profiles and implement succession plans

Since December 2021, Codere has been optimizing the monitoring of the *One People* projects by modifying the reporting system, assisting the People Area in its transformation.

The company has brought its policies in line to monitor projects, both corporate and by countries, in terms of progress made in the execution and allocation of funds, including them in a single monthly report.

The report has become an effective decision-making process, in view of the increased



reporting frequency, for decisions to be made from a single viewpoint and on the basis of homogeneous policies.

One People has undertaken over 80 strategic projects since 2019, with a 70% degree of progress over the forecasts of the overall plan at December 31, 2022. These projects undertake projects such as Codere Personas Digital (Cornerstone), the Management Model, the Leadership Model, the Onboarding process, and employee work-life balance and wellbeing management plans, among other matters.


Codere Personas Digital (Cornerstone), accompanying the transformation


The use of technology permits Codere to gain efficiency also in the management of its human resources. Using innovation, Codere has improved its internal processes and its image as an employer brand. By centralizing the information and optimizing its time management, the company has managed to operate more efficiently and increase talent recruitment and retention.

Codere Personas Digital (Cornerstone) is a talent management app recently implemented in the company, that supports the recruitment, onboarding, training, development, assessment, remuneration and administration processes, simplifying the daily work and offering a global view of the employee's life in the organization.

From the 2021 year start, the People Area has been working on this critical project, which offers a self-service that expedites the administrative processes and decentralizes some of them. This project makes the processes of the various business units homogeneous and ensures that the information is transparent and provided in real time.

The new tool is divided into four modules:



 <p>Core HR</p> <p>Persons Management, Reporting and Analytics, Organization Charts...</p>	 <p>Recruiting Suite</p> <p>ATS, Candidates Management, Employment Site, Onboarding...</p>	 <p>Learning Suite</p> <p>LMS, Certificates, Cooperative Communities...</p>	 <p>Performance Suite</p> <p>Creation of a high performance culture maximizing potential</p>
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In 2022, the settings of all the modules was completed. Three of them (**Core, Recruiting/ Onboarding and Learning**) are operating in Argentina, Colombia, Uruguay and Panama.

- As an improvement in the **Recruiting Suite** module, a chatbot has been enabled at the first stage of the recruitment processes to expedite mass processes, with an absolutely independent interview upon receiving the customer's registration with the offer.
- The **Performance Suite** module is at the pilot stage at the Sheraton hall in Panama, where all employees have participated in the behavior assessment process. Also, on the remuneration side of the module, the DPO model is being tested, including target setting and assessment processes.

In 2023, the company intends to deploy all four modules in Spain, Italy and Mexico and the Performance Suite module in the rest of the countries, in addition to closing the interfaces between the various applications for the data to travel from DPC to salary receipt and to the rest of applications that may need data of the employees.

Also, to ensure a successful deployment and for the employees to receive adequate training and the most precise assistance, the **Programa de Embajador (Ambassador Program)** has been implemented to identify collaborators with outstanding communication skills and influence, whose function it is to contribute to the wide use of the platform, having the teams enter it and providing training to manage it.

In the context of the Transformation Plan, in 2022, **salary management** processes were consolidated in a CSC located in Argentina with an external provider. This process commenced in 2020 and was completely implemented in 2021 in Argentina, Uruguay, Colombia and Panama. In turn, progress has been made in implementing the salary project in Spain, where it is expected to start functioning in 2023.

Through this project, Codere seeks a more flexible organization model simplifying the structures to make the organization more agile in its activities.



05.3.2 Responsibility starts at home

In Codere, social commitment starts at home. Codere considers its collaborators' needs and expectations to be a priority for them to be able to perform their functions in the best possible conditions. With this aim, the **Corporate Social Responsibility Plan** for employees includes actions both for employees and, through them, for society³¹.

In 2022, the internal action plan was reinforced to improve the collaborators' working environment, with initiatives taken on each of the pillars supporting the plan:

Diversity and equality
Inclusion
Work-life balance and wellbeing
Integration
Sustainability

Diversity, equality and inclusion

Codere is committed to people and to their personal circumstances, understanding **diversity, equality and inclusion** to be competitive advantages that enable a good working atmosphere and improve employees' productiveness and proactiveness. This belief is reflected by the fact that the company employs people from around 46 nationalities, 59% of them men and 41% women.

The organization has developed a corporate **Equality, Inclusion and Diversity Policy**. At the same time, it strengthens this pillar by developing and implementing equality plans, equal pay for men and women; the Women's Leadership

program, the definition of a situation map in terms of diversity to adopt measures for improvement and actions to increase the visibility and raise awareness on the difficulties and integration of the LGBTBI group and the development of the Protocol for Prevention of and Action against Bullying and Harassment at Work, among other measures.

In respect of **inclusion**, Codere focuses on the insertion of people with sensory and motor differences, positive discrimination of these people in certain jobs, awareness talks and alliances with various associations, organizations, employment sites, etc., targeted to people with disabilities and at risk of exclusion.

Work-Life Balance and Wellbeing

From the work-life balance standpoint, the group has in place since 2021 the **Global Remote Working Policy**, to improve the reconciliation of the employees' working, family and personal life. This policy has been developed on the principles of voluntary work and equality and non-discrimination at work, although certain requirements are established to be able to work remotely, to minimize the risks and ensure the proper functioning of the company.

In this regard, the **right to digital disconnection** contemplated in the policy is to be pointed out. This right ensures that employees enjoy, through a series of organizational measures and technological safeguards, the right of any person not to remain accessible for working purposes during their leisure time, leaves of absence and vacations.

³¹ The second part of the CSR Plan, actions for society, is further developed in chapter 5.1 *Safe Gaming*.



Integration

The company, in the integration area, has focused on implementing training and professional development plans, in line with the values and culture of the organization, such as the **Leadership Model**, the **Management Model**, **AvanzA+** and the **School of Facilitators**, through which the employees are able to strengthen their leadership and acquire abilities and skills essential for their professional growth in the group.

It also pays special attention to the training of new employees through its **Onboarding Plans**.

Sostenibilidad

Throughout the year, Codere has continued its **zero tolerance for plastic waste** policy and has promoted campaigns and initiatives to rationalize energy consumption (these matters are further developed in Chapter 6.1, *Respect for the environment*).

The various initiatives mentioned are further developed below in this chapter.

05.3.3 Committed to talent

Talent management and training are key factors for the optimum development of Codere's strategy. In view of this, the People Management worked in 2022 on reviewing policies, encouraging teleworking, implementing measures for talent recruitment and retention and encouraging the promoting and professional development plans of its teams.

Talent retention

The company fosters people's wish to develop their professional career in Codere and give the best of themselves. To achieve this, the implemented actions are based on six pillars:

- (1) Internal promotion opportunities
- (2) Internal communication
- (3) Diversity and equal opportunity
- (4) Equal remuneration and benefits
- (5) Workforce wellbeing
- (6) Training

1. Oportunidades de promoción interna

In addition to attracting new talent, the company encourages the internal promotion of its collaborators, affording them the possibility of personal and professional development within the organization. In 2021, Codere established global professional career management principles, for internal promotion decisions to be as homogeneous and transparent as possible, with the maximum safeguards of success both for the person promoted and for the organization. These principles are implemented in the **Talent Management Policy**.

In addition, as mentioned in *Chapter 2.2 Purpose and presence*, Codere continues to strengthen its collaborators' leadership and ensure that



they remain in line with the company values and culture, through the *Leadership Model*, the *Management Model*, *AvanzA+* and the *Ongoing Assessment Program*.

• **Leadership Model**

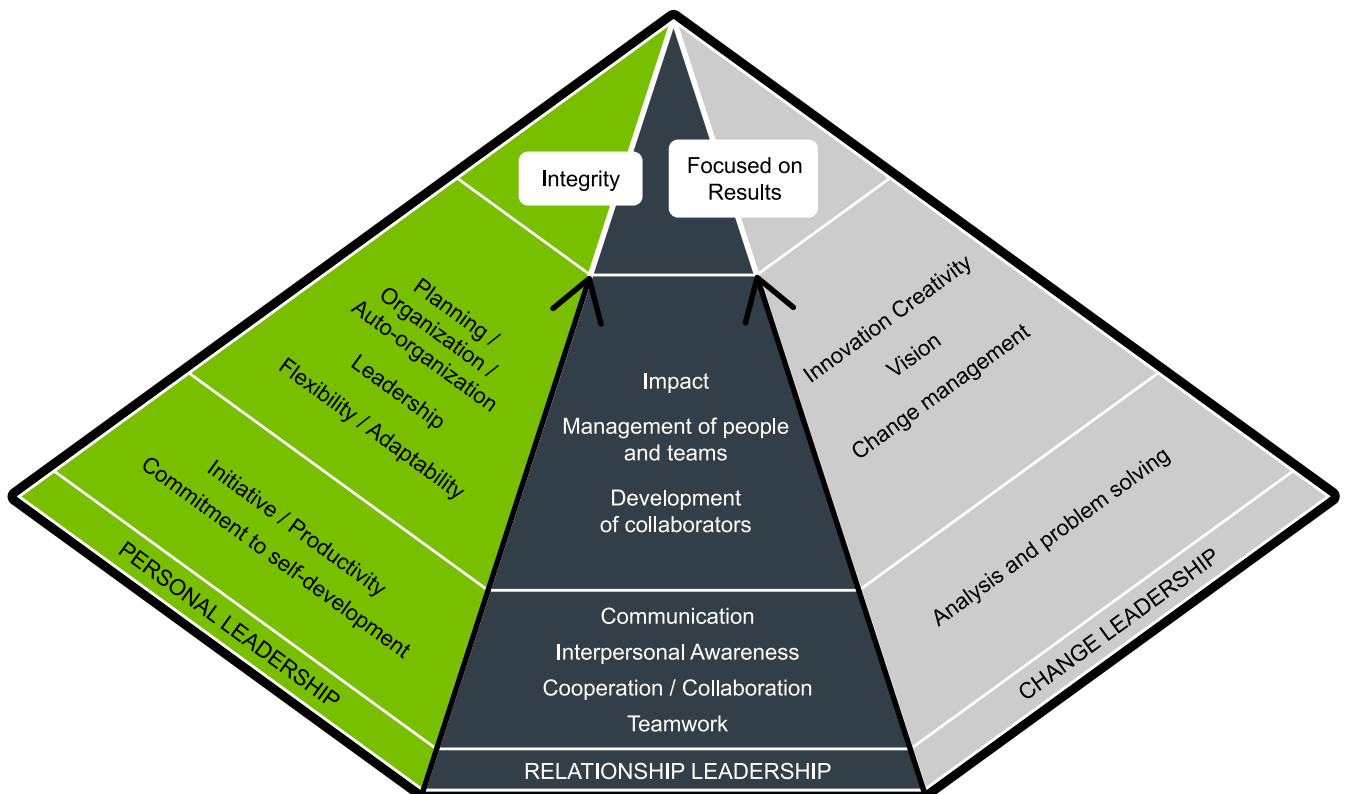
The **Leadership Model** defines the responsibilities and forms of conduct required from the persons responsible for the organization, in line with the values identifying the company and establishes a route to identify, train and develop its leaders on all three sides of the leadership pyramid: **relations leadership, change leadership and personal leadership**.

The model is a tool to achieve employees' growth through the set of selection, assessment, training and development plans of the company, making the leader development process clearer and more transparent.

• **Management Model**

It conveys the philosophy of management and is conceived to encourage leadership. It is a handbook of instructions for senior and middle managers who access the function to guide their actions with third parties in their day-to-day affairs. The principles that it contemplates should help people managers to identify and define and define patterns of conduct and behaviors to manage their collaborators adequately. It should also help employees to identify a series of behaviors and attitudes that they must demand from their bosses in their day-to-day affairs and when performing their work in the company.

In 2021, with the participation of 330 collaborators (senior and middle managers, technical staff, operators and office workers of all countries), the People team prepared the **Management Model Handbook**, which contemplates the twelve essential functions of managers in their day-to-day affairs. A route map was also established for its



dissemination and implementation through training and communication campaigns.

In 2002, efforts were thus focused on implementing the model through training and questionnaires to be answered by the collaborators to know their opinion on the management, in each of the territories, on the basis of the twelve functions defined in the handbook. Approximately 2,200 employees participated in the process and the results allowed the organization to identify the strong points and to develop measures for improvement to meet the real needs of each country.

- **AvanzA+**

In 2022, the **AvanzA+** plan was implemented for the retention and development of employees holding key positions in the company.

This talent retention and development project, which will be in place until 2026, is targeted to collaborators in mid-career holding key positions in Codere, whom the company considers to be essential for the development of the business and whose capabilities it wishes to enhance. Through this initiative, a customized training and development route is drawn up in accordance with the expectations of the 410 collaborators to whom it is targeted and with the company's needs (it includes executive coaching, internal mentoring, participation in strategic forums and global transversal projects, temporary rotations, global practice communities, external talks and conferences and facilitates participation in the *Executive Development Program*).

AvanzA+ also includes the definition of succession plans for key first-line positions.

- **Ongoing Assessment Program**

In addition to the above programs, Codere has other tools to manage its collaborators' professional development and improve their internal promotion opportunities.

In 2021, the new assessment process was designed defining homogeneous policies to manage the professional careers of all employees using a performance and potential matrix (Codere boxes), to classify the talent of its employees in order to manage their professional careers more quickly and successfully. It has also required training for managers and PBPs (people business partners) for its correct implementation.

During 2021 and 2022, a pilot test was carried out in four countries, with more than 1,369 people involved, and the program has started to be digitalized on a new platform (Cornestone).



2. Internal communication

Internal communication is essential for the proper functioning of the business: to convey relevant news and tasks, to promote a culture of transparency, to involve the employees in the management of the company and to put into practice Codere's mission, vision and values. Internal communication is accordingly a key factor to retain talent.

To encourage internal dialogue, the Corporate Communication Area of the group, together with the various areas and the general management, manages the distribution of information to collaborators through the following channels:

- **Codere Actualidad:**

The corporate newsletter, published monthly, has continued to reach employees in 2022 with internal reports and news on the organization and the industry, and the editorial content of the General Management, reflecting the group values and culture and keeping the employees up to date on the news on the company.

- **Codere Informa:**

These communications sent by e-mail contain updated information on the most relevant affairs of the group (appointments, notices from the areas, reminders of regulations or protocols ...).

This year, more than 200 communications were sent through this channel, without computing reminders, on miscellaneous matters such as corporate policies, internal news on the business units and activity areas, organizational changes and training campaigns, among many others.

- **Codere en Positivo:**

On April 1, 2022, this internal informative site, that had been the meeting point of collaborators during the pandemic, closed after they returned to in-person work. During

the two years for which the platform was active, it received more than 65,000 visits, reaching almost 17,000 individual users.

Some of the content developed on the platform, for example on cybersecurity (*CiberHub*) and on compliance (*Compliance Corner*), has finally been included in *Codere Actualidad*, published monthly, for all group employees to remain informed.

- **Others:** such as intranets, corporate social networks and the internal distribution of press releases.

These channels may be used for all kinds of **strategic campaigns**, to reinforce messages from the General Management or the various business units and/or areas to the employees. In 2022, the campaigns launched included:

- **Compliance:** promotion of the Reporting Channel and of the corporate policies.
- **Health and wellbeing:** recordatorios de los días internacionales vinculados con la salud y consejos para una vida saludable.
- **'Somos Codere, somos corazón' ('We are Codere, we are heart'):** campaña de *engagement*, compuesta por una treintena de piezas audiovisuales, en la que empleados, antiguos empleados, directivos, clientes y jugadores de los equipos patrocinados de fútbol, Rayados de Monterrey y River Plate, comparten sus testimonios sobre lo que significa ser parte de Codere.
- **Equality and diversity:** campaña de sensibilización que acerca del rol de la mujer en las empresas y su presencia en puestos de responsabilidad, así como de apoyo a la diversidad.
- **Cybersecurity:** campañas sobre los riesgos y protección tecnológica.
- **Social responsibility:** de apoyo a causas sociales, como la ayuda Ucrania, a



iniciativas contra la violencia contra la mujer, campaña ‘Banco rojo’, etc.

- **Industrial transparency:** campaña ‘Más datos y menos mitos’, que acerca a los colaboradores una imagen fidedigna de la situación de la industria para que pueda ser conocida a la luz de sus datos y no de las falsas creencias que se difunden sobre ella.

Adicionalmente, las distintas unidades distribuyen sus comunicados de carácter local, con información relevante para su negocio.

3. Diversity, inclusion and equal opportunities

Equality, inclusion and diversity are cultural pillars at the foundation of the group’s growth. In 2021, *Codere*, under the *Code of Ethics and Integrity*, approved the **Equality, Inclusion and Diversity Policy**, implementing the company’s philosophy of ethical management in matters of respect for and inclusion of especial groups. *Codere* consolidates this commitment by taking actions that improve the employees’ working experience, regardless of their age, gender, race, culture, beliefs and sexual preferences.

“Codere understands diversity as a growth and value lever. This is shown by its workforce, consisting of 11,046 collaborators of more than 46 nationalities”

Thus, the recently prepared **Guidelines for publication of employment offers to promote inclusion, diversity and equality**, implements a specific protocol for the publication of inclusive employment offers, opening them up to people with disabilities -provided that this is possible given the position offered-, publishing the offers on the basis of the inclusive language decalogue and adding in all of them *Codere*’s commitment to inclusion, diversity and equality.

Codere has also approved policies and implemented actions based on each of these pillars. For equality, it establishes the bases for the change and increases its commitment to women’s leadership and equality. It considers that equal pay, inclusive culture and the promotion of women’s talent must be the pillars of its commitment, with tangible targets for the progress made by the company to be seen in all the countries in which it operates. The



organization has approved the Equality Plan for Codere España and extended this requirement to the rest of the countries of the company. It has also created a working group to lead the actions at the business units. Measures contemplated in Spain's equality plans have

also been applied in the rest of countries. These measures include awareness talks, training courses and events to raise awareness on gender violence, among others.

The equality plans include:

- **Review of the language of the employment offers**, to make it inclusive.
- **Putting in place measures for gender awareness at the workplace.**
- **Promotion of women to positions of responsibility**, expediting the development of their professional career within the company.
- **Control of the pay gap and measures to control it.**
- **Statement of the commitment of the company against any form of mobbing or harassment for gender reasons.**
- **Information and training afforded to collaborators on equality matters.**
- **Dissemination of the work-life balance measures** to which the employees are entitled.

This year, the company started to implement the **Women's Leadership** program, for the full inclusion of women in the organization. Eight workshops on social matters have been organized in four months, with the cooperation of an external consultant, for a total 67 collaborators distributed into mixed groups (60% women and 40% men). At these workshops, using practices to promote dialogue and cooperative analysis, matters were undertaken such as inclusion culture, goals and targets to be achieved in the organization, training of trainers, for each one of them to become a facilitator in their scope of work and implement this initiative.

In 2022, **gender equity talks** were given, in all the countries, by professionals of Torcuato di Tella University, in Argentina.

In respect of the **inclusion of people with sensory and motor disorders**, Codere promotes a culture that encourages team work, adding value by uniting the differences and including groups with disabilities or at the risk of social exclusion. The workforce currently has 62 differently abled professionals^{32 33} (0.56% of the entire workforce), a number that has decreased slightly (by 10%), compared to the 69 employees the year before. Codere also employs 18 differently abled persons for various activities (such as for the cleaning of offices and gaming halls), employed through special employment sites.

All of Codere's facilities comply with applicable legislation on accessibility, ensuring that all the group's halls and offices are accessible by persons with reduced mobility.

³² The differently abled employees are distributed among the following countries: Italy (47%), Colombia (18%), Spain (15%), Panama (11%), Argentina (5%) and Uruguay (5%).

³³ Laws in Spain, Italy, Panama and Uruguay require a proportion of the workforce to be reserved to employees with disabilities. If it is impossible to reach that proportion, exceptional measures may be applied, such as commissioning the services of special employment sites (Spain) or paying a contribution (Italy, Panama).



In respect of diversity, through the **Code of Ethics and Integrity** (CEI), the group promotes a team work culture, uniting the differences and including all kinds of groups at risk of social exclusion. Also, in its vocation to achieve a working environment free from discrimination, the company constantly reviews its harassment and discrimination prevention framework. Indeed, last year, Codere updated its **Protocol to prevent, respond to and eradicate violence at work**, in place in the group since 2013, to provide integrated coverage for the protection of workers.

Codere has also undertaken **actions for the inclusion of groups** such as LGTBI, through:

- Three awareness seminars and talks for managers and employees; training to PBP (*people business partners*) on the problems of this group and its management; and, diversity and inclusion sessions with middle managers and operators of all the countries.
- In Spain, through COGAM (LGTB+ group of Madrid), the organization has participated in working groups and promoted awareness actions.
- Design of training for Onboarding on inclusion and diversity matters, with the support of *Bridge the Gap*.
- Commemoration of the LGTB Pride Day, through various activities to raise awareness on the importance of normalizing diversity and to reflect on the main challenges and opportunities faced by the group at work:
 - Broadcasting of “La ruleta de los privilegios” in Panama, discussing the differentiation (and, eventually, discrimination) that having certain personal or social features, such as having superior education, being of a certain race or ethnic group or having certain preconceived social and economic features implies.

- The “Diversity, respect and differences: how to be better united” session in Italy, by the hand of professor Lorenzo Gasparini, discussing the boundaries between compliments, jokes and inadequate behaviors; the consequences at the workplace of unequal relations; and, the damage caused by impairing wellbeing in the organization.
- Delivery of multi-colored pins to the employees and voluntary inclusion in the corporate e-mail signature of a diversity emblem.

In addition, on the path to integration, Codere maintains its alliance with Red Pride, as member in Argentina, Panama, Colombia and Mexico, participating regularly in the meetings of its various working groups to include certain proposals with a view to 2022.



4. Equal pay

Remuneration is a key tool to attract and retain the best talent³⁴. To that end, Codere has in place a specific model establishing ranges of fixed remuneration (based on the analysis and assessment of the posts of work, internal equity and external competitiveness) and variable remuneration (in the short term), under the umbrella of the collective bargaining agreement, which ensures equal salary and non-discrimination.

In 2022, to make the variable remuneration more competitive, the system has been adapted and a new system of quarterly remuneration of operations has been established for the Mexico, Panama and Colombia business units, in line with the corporate strategy and targets. This new system serves as a lever for the achievement of these targets since it measures the business indicators, customers, operating excellence and ongoing improvement.

The model was developed with the direct participation of the various operating managements of the business units involved, which conveyed their needs with regard to the key factors to be taken into account.

In the equal pay context, in 2021, the *Equality Plan* was implemented in companies in Spain to review the pay gap, the organization undertaking to follow it up at least annually, in order to analyze its evolution and be able to implement corrective actions. The company has as yet to hold the steering meetings of the year.

In general, the average remuneration of the company employees increased between 2021 and 2022 by approximately 17%, in both men and women. The average pay gap is nevertheless 23%, varying depending on the professional groups and age, oscillating

between -24% (showing that women executives of ages between 20 and 39 receive a higher remuneration than men executives of the same ages) and 45% (in the case of men executives over the age of 50)³⁵.

³⁴ The Remuneration Policy for Directors is further developed in Chapter 4.1 *Corporate Governance*.

³⁵ The average remuneration and pay gap is further developed in Annex II. *Breakdown of Human Resources Indicators*.



5. Work-life balance and wellbeing

This year, Codere has continued to adopt measures to improve its collaborators' workplace wellbeing, focused on teleworking and work-life balance, to adapt to the current social situation that evolves faster day by day and requires people to make a greater effort to reconcile their working life with their personal life.

Among these measures, one of particular relevance is the approval in 2021 of the **Global Teleworking Policy**, arising from the urgent need to establish guidelines and procedures to work from home. Through this policy, the group seeks to improve the quality of living of its employees, to increase their productiveness and to contribute to respect for the environment, establishing measures for a better personal and professional development of its collaborators, in the certainty that a positive balance between them will contribute to the growth of the organization.

A través de esta política, el grupo busca mejorar la calidad de vida de sus empleados, incrementar la productividad y contribuir al respeto del medio ambiente, estableciendo medidas que permitan un mejor desarrollo personal y profesional de los colaboradores, con la certeza de que un balance positivo entre ambas perspectivas contribuirá al crecimiento de la organización.

“In 2022, teleworking was implemented at all headquarters and very well received by the entire workforce, with the rule of digital disconnection attached”

Objectives of the Global Remote Work Policy

Regulate the teleworking procedure.

Be the method reference framework to ensure that decisions on remote work are homogeneous.

Improve productiveness, through a more flexible work system, contributing to achieve an optimum work-life balance.

Reduce the absenteeism ratios, improving the collaborators' occupational health and safety by reducing the time to travel to work.

Contribute to improving the environment, by reducing the number of trips to work and polluting gas emissions.

Optimize the organization of physical areas at which the work is performed, with the cost savings implied.

Integrate data privacy and security policies into teleworking, ensuring secure data processing.

In addition, the company encourages trade union representation to facilitate the labor relations and permanently improve its employees' working conditions, as these are reflected in the collective bargaining agreements. Most of Codere's employees are subject to collective bargaining agreements, either general for the industry or specific³⁶.

Also, since 2019, Codere has a **Working Time and Timetable Control Policy** in place at its companies in Spain. In 2022, the company continued to use the **DassTime** app for the digital control of the working time of most of its workforce. The app is expected to be fully implemented at all workplaces in Spain throughout 2023. This tool will be of assistance for the management of the companies in Spain and Corporate.

³⁶ The percentage of employees subject to collective bargaining agreements is further developed in Annex II. *Breakdown of Human Resources Indicators*.



Codere promotes the organization of working time, adapting it to the needs of the company and of its employees through actions commenced and managed globally, always in compliance with the collective bargaining agreements³⁷ and the legislation in force in each territory.

The organization also encourages social dialogue, at the business units, both formal, such as institutional meetings and meetings with union representatives, and informal, to foster fluid dialogue, such as monthly breakfasts, open dialogue at the halls, contact with the local PBP, and contact via e-mail and social networks, training and use of the Reporting Channel.

The actions taken and the work performed by Codere to improve workplace wellbeing have given rise to a high level of satisfaction of employees with their post of work and a **low absenteeism ratio**³⁸.

In 2022, Codere designed and implemented a regular absenteeism report for the group. The numbers show that, in 2022, the company had a reduced absenteeism ratio, of 1,482,274 hours over a total 32,520,059 hours worked. This represents 4.56% of the total hours worked, implying a slight increase above the absenteeism ratio of the year before (716,942 hours of absenteeism, 4.01% of the total hours worked), among other reasons, because the working hours are recorded more precisely using the various working time control tools, the return back to normal, etc.

6. Training, promotion of transformation

In 2022, Codere successfully implemented its training module in Codere Personas Digital in Argentina, Colombia, Panama and Uruguay, permitting all employees to receive, fast and simply, both the compulsory training specific for their posts of work and on-demand training, by selecting the courses in which they are interested from the list made available to them, thus encouraging self-development.

“Through training, Codere reinforces the commitment of its professionals and encourages transformation”

To continue with the training plan defined in Codere, this year the collaborators received training on compliance, such as the **prevention of money laundering and of terrorist financing, the prevention of occupational risk and the promotion of responsible gaming**. Other specific training for the different posts of work and languages (English, Italian and Spanish+) is also afforded.

Codere has continued to train its collaborators in skills, knowledge and abilities to improve their performance and professional development in line with the Management Model, Avanza+, the Operating Excellence Model and the School of Facilitators projects.

³⁷ Codere performs its business in the gaming industry, of great complexity given its international geographical diversification and the particular features of its various workplaces (head offices, delegations and businesses: racetracks, machines, gaming halls, all of them very complicated from the structural point of view, particularly the halls: betting shops, bingos, arcades). To this must be added the differences that exist in the regional and autonomous laws applicable to these facilities (in the case of Spain) and in the country, since the businesses are subject to different laws depending on the countries where they are located. Codere is aware of the importance of reconciling professional activity with family life, using measures to establish flexible timetables, when the activity permits this, or bring certain services closer to the workplaces, saving its collaborators travel and time. The company seeks to achieve a balance between the professional development of its business and the engagement in personal pursuits of its collaborators, with added value for employees, improving their satisfaction with the working atmosphere and conditions.

³⁸ The number of hours of absenteeism is calculated including: hours of leaves without permission, hours of absence for industrial accident, with and without sick leave, and hours of absence for ordinary disease, with or without sick leave.



- Under the **Management Model**, in 2022, three online training modules were implemented, permitting managers to know and apply these functions in their day-to-day activity. Also, the first module of the program was implemented at all the business units (except for Italy for the time being) simultaneously. This module includes five of the management functions: strategic vision, planning, organization, control and achievement of targets. It must be pointed out that in some countries modules 2 and 3 have been launched for all managers and executives of the company.
- Under **AvanzA+** a training route has been defined for 390 persons distributed in the 2023-2025 period (95% of the collaborators assessed in line with this initiative).
- To improve customer relations at the halls, the **Operating Excellence Model** was implemented. This corporate project seeks excellence at all levels of the organization, to build up a competitive advantage. It is for this purpose that the **Operating Excellence Program** was designed. This ambitious training plan is focused on raising awareness and developing the key skills of employees and has a direct impact on customer experience in Codere.
- The plan, targeted to employees working in close contact with the customers (managers, middle managers and operators), includes 54 hours of training (online and in-person) per collaborator, distributed in three modules: customer experience and skills, development of collaborators and leading customer experience. This training was well received by the employees, with a high degree of participation.
- The **School of Facilitators** initiative encourages a learning model in Codere based on internal and online training, which requires internal trainers to be grouped and

further skilled to be able to move in different surroundings.

This initiative accordingly starts by identifying employees who may become trainers because they meet a series of established administrative and conduct requirements, then training and skilling them as necessary for them to provide specific training in any program. The company continues to accompany the collaborators to give them feedback, creating areas and surroundings that motivate ongoing learning, monitoring the process to identify needs; and identifying trainers to train the rest of the trainers.

In 2022, 377 collaborators received training through this program.

In turn, given the spread of digitalization and teleworking, Codere has continued to take many global **cybersecurity** actions to train and raise awareness in the employees of the current threats.

In line with the development and implementation of the Corporate Social Responsibility Plan, Codere has continued to undertake many training actions in the various areas covered by the plan, including matters of **responsible gaming**³⁹ and sessions to raise awareness of diversity and inclusion matters in managers, executives and non-executive personnel, in association with several external organizations.

³⁹ Training on responsible gaming is further developed in Chapter 5.1 *Commitment to CSR and Responsible Gaming*.



Codere has also continued its **Recruiter Experience** training plan, to provide ongoing training. This plan started to be implemented in September 2021 with the launch of the “Terms of and homogeneity in Codere’s recruitment and selection process”. In 2022, two new actions were launched:

- “*Selection of the success profile of key first line operator positions*”, to convey the success profiles defined in 2021 for the positions whose main function is customer service, practicing the techniques to be used for their optimum selection and providing practical tools to ensure success in the process.
- “*Diverse and inclusive recruitment and selection processes*”, allowing, in addition to knowing how to undertake these selection processes, to promote a diverse and inclusive organizational culture, in which the particularities and differences of people are respected and discrimination is eradicated.

Between both actions, 54 training sessions were held which reached 900 persons in the company between the people area and middle managers who participate in the selection processes, reaching 1,490 hours of training.

In 2022, the hours of training increased by 29% in comparison with 2021, even higher in the group of operators, with a 68% growth in respect of the year before⁴⁰. This is due to the promotion of online training by implementing Codere Personas Digital (Cornerstone) in four countries, meaning that hours of training increased particularly among operators.

⁴⁰ The hours of training received per professional group is further developed in Annex II. *Breakdown of Human Resources Indicators*.



Talent attraction

Select and recruit the best talent

One of the pillars of any corporate strategy is talent attraction, selection and retention, to create a competitive team and add value to the company. Companies search for the best and most diverse professional profiles. To achieve this, offering a challenging and convincing experience to the candidate has become essential for employer branding.

Codere wishes to offer an agreeable employee experience at each stage, to be a proposition of value in the labor market, ensuring that the brand conveys its culture and history, making its employees proud and attracting talent.

It is because of this that, in 2022, the People Management focused on the development of several actions that contribute to promote the ongoing improvement of the selection and onboarding processes, involving everybody who participates in them, by digitalizing the processes to improve their efficiency and quality and positioning Codere's employer brand for it to attract the most competitive and qualified profiles and improve the talent retention ratio.

The company has several tools to facilitate the successful outcome of the selection process: the **Global Recruitment and Selection Policy**, used as the reference framework, accompanied by the **Codere Recruitment and Selection Handbook**, the **Guidelines for Interviews on Skills**, the **Guidelines for Selection of Success Profiles**, the programmed consoles to support the selection, and consultation material and offline and online support courses, to have a meeting point to use in the case of doubt.

This is shared through the various training actions, both with the PBP teams and with the managers of the company who participate in these processes, available at **Codere Personas Digital**.

Global Recruitment and Selection Policy

Our frame of reference



Codere Recruitment and Selection Handbook

Become an expert



Guidelines for Interviews on Skills

Ensure your success



Guidelines for Selection of Success Profiles

Our business in the best hands



Recruiter Experience

In 2021, Recruiter Experience was designed and launched. This is an ambitious ongoing training plan that includes, in eight modules, the key content on the manner in which to conduct the selection process, from the publication of the offer to the making of the final decision.

Its purpose is to integrate and globalize the actions to be taken, raise awareness on the relevance of these programs, enable the development of key skills and provide agile and simple tools adding quality to each process carried out, for recruiters to become ambassadors and guarantors of the Codere brand.

Commitment to effective inclusion

The talent recruitment and selection strategy seeks to achieve effective inclusion. Codere considers it an unavoidable commitment to be diverse, equality driven and inclusive from the start of the selection process. Also, the company does not select talent on the basis of a certain profile and focuses instead on the professional skills, attitudes and values of each individual. Because of this, to make equality effective, the company contemplates measures to prevent, suppress or compensate the discrimination suffered by certain groups, including specific measures for the attraction, recruitment, selection and employment of their members. In addition, in 2022, the group PBP participated in several workshops providing training on the recruitment of persons with disabilities, offered both by the associations with which Codere cooperates, and internally.

In line with the above, the company has renewed its alliances with several associations, organizations, employment sites, etc., focused on persons with disabilities and at risk of exclusion, such as Disjob and Ilunion in Spain or Fundación Forge in Uruguay. The company has also made new alliances with Jobmetoo in Italy and Éntrale, in Mexico, and has cooperated with

IMMULA and AMIA in Argentina, to search for talent.

Also, to encourage senior women's talent and the inclusion of people with disabilities in the labor market, the halls and workplaces display, since August 2022, notices inviting CVs.

References program

Another of the initiatives undertaken this year, which affords employees the opportunity to introduce people they know other than family relatives and with a professional success profile that may fit in the vacancies that arise the company.

Once the new employee has joined Codere and passed the trial period defined by the program, the employee who introduced the new starter will obtain a reward from the company for their contribution to finding the best talent.



Global Onboarding Process

In 2021, Codere defined and implemented the **Onboarding Process**, to offer a homogeneous program to welcome in the best possible manner any person joining Codere, from the first day.

This process permits the corporate culture to be shared and new collaborators to participate in the day-to-day activities, to stimulate their feeling of belonging.

To ensure its success, a monitoring process has been defined permitting the impressions of the new starter on his onboarding process to be known, in addition to the manager's assessment of the new starter.

Stages of the Onboarding Process

- Preparation of the new start.
- Welcoming and start of induction.
- Consolidation of induction and development of the collaborator.
- Monitoring.
- The Onboarding Process covers the needs for integration, training and development of collaborators from the time when they join.

The onboarding process was deployed through several awareness actions and a communication plan targeted to the People Area and to all company managers. Throughout 2022, considering this process to be essential and involve all Codere's collaborators, the communication campaign '**Todos Somos Tutores**' (We are all Tutors) and the training resources created for the purpose have been deployed in the entire organization, to continue to build a comfortable experience for any new starter.

“It is essential for new starters in the company to be correctly accompanied for their best performance and retention”

Work has been done for the process to be constantly improved and updated since it was launched. Because of this, at the end of the year, taking into account that the “tutor” (colleagues who hold the same position as the new starter) is essential, in Italy the first “*School of Onboarding Tutors*” experience was launched to afford this role the training and tools necessary for them to be able to support, teach and give feedback to the new starters of their areas in the best possible manner. In 2023, this program will be implemented in all the geographical areas in which Codere performs its business.

Employer branding

To expand Codere's corporate culture, give the brand visibility, encourage pride in belonging, increase the number of candidates who wish to form part of the company and reduce the rotation of employees on strengthening their commitment, are only some of the benefits of successful employer branding. Because of this, while it is essential to work on the image that Codere wishes to convey to its customers, it is equally important to do so with a view to its own employees and potential candidates.

Accordingly, in 2022 efforts were focused on both sides:

- Internally, the work has included from the construction, promotion and improvement of the message to be conveyed in an employment offer, in an interview or in the onboarding process itself, to the commencement of the construction of the



proposition of value to employees for them to decide to work at Codere.

- Externally, several direct impact initiatives were taken to position the Codere employer brand as a reference in the industry and the market, including, in addition to the actions already discussed in this chapter, the definition of **the global positioning of Codere in the most relevant professional digital channels** as a renowned employer brand at the international level: LinkedIn, Glassdoor and Indeed.
- In 2022, it has been crucial to **activate the corporate channel in LinkedIn**. Codere's page "Vida en la Empresa" (Life in the Company) has been active since August. This page is published in Spanish and Italian to reach both current and future collaborators.
- The company carried out an internal communication campaign where, in addition to informing the employees, they were encouraged to take care of their profiles through a **Handbook of Advice to improve Presence on LinkedIn**.

In addition, to position the company in the various employment showrooms encouraged locally by both public and private and educational entities, in 2022, Codere commenced, under the **Attraction Project**, to increase its participation in several employment forums and fairs. This initiative will be consolidated in all countries in 2023.

Focusing our 'Value Proposition to Employees' (VPE)

After the framework defining the renewed 'Value Proposition to Employees' was approved in 2021, and a series of actions were taken to enhance its values among the collaborators, in the first quarter of 2022, Codere launched in Spain, in cooperation with the IE, the **Barómetro de Experiencia de Empleado (Employee Experience Barometer - BEX)**. The purpose was to know what collaborators valued about working at Codere, to understand those issues with which they were satisfied and those aspects in which their experience might be improved. After analyzing the results, a short-term action plan was prepared focused on the most relevant aspects to be improved.

2022 Attraction Project

- Bumeran Academic Tour. Bumeran and Austral University, Argentina (April)
- Visitors invited by Disjob to the 8th Fair on Disability and Employment. Spain (June)
- Expo Konzerta. Panama (September)
- Participation in the Career Day of EBTL (Ente Bilaterale del Turismo Lazio). Specific for the Tourist Industry. Italy (June)
- Online participation in the Career Day of Cusano University. Italy (October)
- Disability and Employment Fair of Madrid Region, Spain (November).



05.3.4 Healthy and safe working environment

From the start of the pandemic, Codere considered the health and safety of its employees, customers and other groups involved in the company's business to a priority, with the implementation of the **COVID-19 Protocol**, the creation and action of the COVID Committee and the adoption of several prevention measures, such as the implementation of a global **Teleworking Policy** for all collaborators. Thanks to the joint efforts made by the various business units, Codere maintained the best prevention practices, worldwide and homogeneously, allowing for an excellent management of the impacts of the pandemic and the ensuing almost absolute recovery of in-person operations.

After the health crisis ended in 2022, to be pointed out in the employee health and safety area is the implementation of the **Occupational Risk Prevention Policy**, approved in 2021. Under this policy, Codere promotes the ongoing improvement of the health and safety conditions in the organization.

Also, the business units of Uruguay, Mexico, Italy, Colombia, Corporate and Spain have health and safety committees responsible for promoting health prevention and promotion activities.

Prevention, the safest bet to face risks

The group understands that it is essential to nurture a preventive culture. Thus, in 2021, the global People CSR area approved the **Occupational Risk Prevention Policy** (ORP). This policy includes, as a quality factor, a statement of principles and commitments for ongoing improvement of the health and safety conditions in the company, to ensure the health, integrity and wellbeing of all its collaborators, customers, suppliers and any visitor at Codere's workplaces.

The purpose is to have a framework of a global scope and homogeneous application in the various business units of the group, to supplement the legislative requirements of each country with the implementation of the best practices, another step forward in taking care of people.

For the same purpose, also in 2021, a **Steering Committee** was organized in each of the countries and is still in place, consisting of the persons responsible for ORP, to ensure adequate compliance and to encourage and participate in the regular meetings to be held specifically to discuss health and safety matters.

In addition, in the ordinary course of business, Codere performs a series of actions to promote the health and safety of all the group's collaborators and customers. In this regard, training courses on fire prevention, occupational risk prevention and first aid have been given, together with other **actions implemented at the local level:**

Argentina

- Creation of the Health and Safety Committee.
- Technical visit reports
- Training contemplated in the *Annual Training Plan*. These activities, except for those that must be performed in person (evacuation drills, first aid drills, fire hose drills), have been carried out through Codere Personas Digital (Cornerstone).
- Evacuation drills at all the halls.
- Training of fire brigades in cooperation with voluntary firemen.
- Update of health and safety handbooks and schedules.
- Measurement of chemical pollutants at the workplace.



- Measurement of lighting and noise levels at the workplace.
- Update of the various maps required by the Provincial Lottery and Casinos Institute (*Instituto Provincial de Lotería y Casinos -IPLyC*).
- Verification and control, together with the firemen, of the fire-prevention network of the halls at La Matanza and Lanús.

Uruguay

- Implementation of health surveillance.

Italy

- Continuation of the Prevention Plan, in compliance with the law.

Colombia

- Preparation of the *Prevention Plan*, to be implemented throughout 2023 by stages, starting by training the personnel on the Health and Safety Committee and delivering the ORP plans of all the halls.
- Certification of the fire brigade, through an external body, in the main city.
- Validation with the occupational risk insurer in other cities.
- Measurement of psychosocial risks to assess the level of stress at work.
- The Health Week, including a series of activities to improve the workers' health and raise health awareness.
- Delivery of personal protection gear in accordance with the posts and risks identified in the risk matrix.
- Implementation of musculoskeletal monitoring, monitoring of risks at height, monitoring of the management of chemicals.
- Organization of the Community Committee and COPASST (Comité Paritario de

Seguridad y Salud en el Trabajo – Worker-Employer Occupational Health and Safety Committee), to mediate in occupational risks with collaborators and to mediate in disputes at work.

- Safety inspections at casinos, including the emergency system (building conditions, first aid kits, stretchers and extinguishers, among other matters).

Mexico

- Preparation of the breakdown of the vast majority of processes by area, and their putting into practice in several inspections made by the authority at several units. This improvement makes it easier to expedite certain points of the investigation and to identify clearly the area to which each law applies.



Spain

- Road safety and psychosocial risk actions, including first aid techniques, to prevent traffic accidents and long leaves.
- Training on emergencies to 75% of the employees (477 people) of the head offices.
- Health and safety workshops on back health, given by physiotherapists and targeted both to people who handle heavy burdens (slot machines and collectors), and for people working at computers. These workshops include practical and theoretical training and stretching exercises on pilates or yoga mats. These workshops are expected to extend to additional workplaces in 2023.
- Cardiopulmonary resuscitation courses at facilities with defibrillators.
- Health checkups on almost half the workforce in Spain and corporate (622 workers), both at medical centers and at mobile units that visit large workplaces. These checkups are voluntary, demonstrating the interest and concern of the workers for their state of health.
- Risk assessments of workers under a teleworking agreement through individual interviews.
- Protection of pregnant workers by granting leaves, before the day forecast for childbirth, where the activity they perform may cause risk in their state, maintaining their full salary (in compliance with the law).

Panama

- Engagement of a specialized engineer to prepare a plan complying with the laws of this country, to increase the health and safety level above the ordinary standards gradually as the plan is implemented.

Despite the implementation of these measures, the working accident ratio of Codere's employees increased in 2022 in respect of 2021, with 59% more accidents (392 accidents) in respect of the previous year (247 accidents). However, this increase is lower than that of 2021, when after returning to in-person activity the accident ratio increased by 191% in respect of 2020. Occupational disease has increased, from one case in 2021 to four cases in 2022⁴¹.

Currently, Codere is at accident levels comparable to those of the period before the pandemic (380 accidents in 2019). Also, the frequency ratio (11.44%) and seriousness (14.76) has increased in comparison with 2021.

⁴¹ A breakdown of the accident ratio is provided in Annex. *Breakdown of Human Resources indicators.*



Workplace health and wellbeing

The pandemic has made even more obvious the importance of caring for health and preserving wellbeing, in order to be in the best condition to face the professional and personal challenges that arise every day.

To manage stress positively, ensure good sleep, keep healthy habits and care for the mind have been shown to be essential tools. In this regard, Codere considers that wellbeing is a key factor for motivation, commitment and productivity.

It is because of this that, in 2021, Codere designed a **Global Health and Welfare Plan**.

This plan pursues the wellbeing of the collaborators from different points of view, such as reduction of tobacco addiction, encouragement of physical exercise, promotion of healthy eating habits, stress control and control of other psychosocial risks.

Content of the Health and Wellbeing Plan:

HEALTH

- Promotion of healthy eating
- Advice on water consumption.
- Importance of taking health checks
- Heart care
- Blood donations.

WELLBEING

- Sleep and rest.
- Encouragement of physical activity.
- Mindfulness.

ACTIVE PAUSES

- Regular short stretching exercises.

MENTAL HEALTH

- Anxiety management.
- Stress management.



We care for our surrounding

06

06.1 Respect for the environment

Codere's commitment to the creation of sustainable value for its various stakeholders is implemented in its *Corporate Social Responsibility Policy* and includes, among other matters, the management of the environmental impact of the company's business and the protection of the environment, in addition to the responsible governance of the supply chain.

Codere has continued to work on mitigating its environmental impact as part of the sustainability core of its social responsibility, despite the fact that the company's activity does not have a relevant impact on the environment. Particularly, the group is focused on combating climate change and decarbonizing the economy, in

line with the principal national and international policies and efforts.

The main environmental impacts of the organization are energy and water consumption, greenhouse gas emissions and the generation of certain types of waste. Because of this, Codere has initiated a series of actions to ensure a sustainable management of its activities and reduce the carbon and water footprint of the group in addition to the organic and non-organic waste produced by its operations.



Optimizing resources

At the end of 2021, Codere started up an **Energy Efficiency Project**, which includes the headquarters and also delegations and own retail points in Spain.

Through a specialized external advisor, the company has carried out a diagnosis of the energy consumption of the various facilities included in the plant, to monitor their performance, identify inefficiencies and define action plans to optimize consumption. The company aspires with this to achieve consumption savings of between 8% and 10%.

In addition, in the context of this project, the group contemplates centralizing the control of the air conditioning and heating of the facilities, adapting also to the business hours of the halls.

Starting with Madrid, the project is being implemented by autonomous regions. In 2022, the company continued implementing the project, which has reached two thirds of its retail points. Codere intends to extend this plan to the rest of countries, depending on the benefit observed in this pilot test.

Energy and water consumption in Codere in the 2021-2022 (kWh) period*

	2021	2022	Evolution 2021-22
Electricity consumption (kWh)**	169,203,025	164,669,075	-3%
Gasoline consumption in (l)***	113,116	63,990	-43%
Diesel consumption in (l)	1,057,277	1,040,430	-2%
Natural gas consumption (m³)	1,289,155	982,656	-24%
Water consumption (m³)****	1,088,847	543,765	-50%

* Calculated according to the invoices available at the date of the report. Does not include information on the business in Malta, Gibraltar or Israel, since the necessary monitoring and reporting systems are not available.

**The figures for 2022 do not include the electricity consumptions of Codere Panama. Currently, only Codere consumes energy from renewable sources (8%) to perform its activity.

***In respect of the fuel consumptions reported in 2020 and 2021, the following countries have not been included, since the necessary monitoring and reporting systems are not available for these countries:

- Gasoline consumption for 2021 and 20212 does not include Argentina, Colombia or Italia. 2022 does not include information for Panama or Uruguay.
- Diesel consumption for 2021 does not include Colombia or Panamá. Consumption for 2022 does not include Colombia.
- Natural gas consumption for 2021 does not include information on Mexico. Consumption for 2022 does not include Italy, Mexico or Panama.

The decrease of the energy consumption and electricity indications are due, among other reasons, to the aforementioned changes of scope.

****The figures for 2022 do not include the water consumptions of Panama. The decrease of this indicator is due, among other matters, to the change of scope mentioned.



Codere promotes in the various countries where it performs its business measures to reinforce its commitment to reduce its energy and water consumption. Among these measures, we point out the following⁴²:

Spain

- Review of the possibility of placing **solar panels** at certain delegations with adequate features for the purpose.
- Installation of eight **electrical vehicle charging points** at the head offices, in compliance with the law .
- Review of the **mobility plan** for personnel working at the head offices of the company.



LEED certificate at the head offices in Spain⁴³

Since 2017, Codere España headquarters have the LEED certification (*Leadership in Energy & Environmental Design*) which was maintained after the renovation works carried out between 2021 and the start of 2022. This authentication is issued by the US Green Building Council and certifies that the building is built meeting eco-efficiency standards and sustainability requirements.

- Review of the inclusion of **alternative non-fossil fueled vehicles** at the head offices (the company is currently studying the needs to build an adequate infrastructure to charge these vehicles, related costs, implementation process, etc.).
- In the transport context, in 2020, Codere set up a **GPS system in the corporate fleet vehicles**, used to study the driving habits of Operations employees (speed, consumption, skills, etc.). Based on the results, certain practices are in place to improve driving, permitting benefits to be obtained such as reducing the peak speed, with a 10% fuel consumption and reduction of the accident ratio. In 2022, both targets were achieved.

Italy

- Migration to LED lights LED⁴⁵ at the new hall in Parma.
- Implementation of an operating process to regulate the equipment operating time of the air conditioning system and kitchen equipment, in particular for all SLOT/VLT.
- Forecast start up, in mid-2023, of a project to install photovoltaic panels, with a maximum generation capacity of 75/100 KWP, with one thousand modular panels installed on the roof of the hall in Parma.

⁴² Colombia, Panama and Mexico will soon join actions against climate change by adhering to a plan to promote procedures and initiatives to contribute to meeting the UNO commitments.

⁴³ In addition to the LEED Certification at the headquarters of Codere, the group intends to obtain in 2023 the Oficinas Conscientes Nivel Bronce (Conscious Offices Bronze Level) certification for the head offices of Codere Argentina.

⁴⁴ Royal Decree-law 29/2021, of December 21, adopting urgent energy measures to promote electrical mobility, self-consumption and the deployment of renewable energy.

⁴⁵ Lighting Emitting Diode.



Argentina

- In 2022, through the paper recycling project, Codere Argentina recycled 89,344 kilos of paper thanks to its alliance with Cooperativa Jóvenes en Progreso, a coop that has for more than ten years helped to reduce, reuse and recycle the paper used at the halls.
- In 2022, the vegetable oil removal avoided the pollution of 1,680,000 liters of water thanks to the alliance with RBA Ambiental, which has engaged for more than ten years in removing the vegetable oil used at Codere's halls (ensuring its correct treatment, moving, storage and recycling).
- Codere Argentina foresees that it will obtain in 2023 the Oficinas Conscientes (Nivel Bronce) (Conscious Offices (Bronze Level)) certification for the head offices, issued by the NGO Argentina Ecohouse. This certificate is promoted by the Ministry of Environment and Sustainable Development of the Republic of Argentina and refers to energy performance, waste, recycling, energy saving and water consumption. For the purpose, a working plan has been developed including the following measures:
 - Adapt the premises using the types of baskets and notices required by the NGO.
 - Training activity (carried out in 2022).
 - Carry out preliminary survey.
 - Perform an audit.

La certificación tendría una duración de un año.

- Purchase of 8%⁴⁶ of the energy consumed from renewable sources.
- Specific changes to LED lights at some halls.

- Forecast trial at the San Martín hall to set up a system to measure the consumption of the air conditioning equipment to automate and optimize its electricity consumption.

Uruguay

- In 2022, the company commenced its work to obtain a **bronze certificate in waste management**, with the first implementation of this model at the Carrasco Casino.
- On December 8, Codere Uruguay **cleaned Carrasco beach**, an initiative promoted by the Carrasco Casino and Hotel on 'Beach Day' for waste management.
- The Company is in the process of migrating lamp replacement to LED; as a result, almost 90% of the lighting is now LED.

⁴⁶ This 8% of renewable energy is the minimum percentage required by law in Argentina, which is supplied to Codere through an independent generator (Cámara Argentina Mercado Mayorista Eléctrico Sociedad Anónima, CAMMESA), a State entity responsible for verifying that companies comply with the established renewable energy purchase ratios.



Mexico

- Completion of the installation of **LED lights** at the Las Américas Racetrack. As a result the number of bulbs was reduced by 50%, with the consequent saving in maintenance and consumption. This also improved the lighting of the track.

La implantación de las acciones indicadas anteriormente no solo contribuye a la reducción del consumo de energía, sino que influye positivamente en la mitigación del impacto de la compañía en cuanto a sus emisiones de gases de efecto invernadero, colaborando a la lucha contra el cambio climático.

En 2022, estas emisiones ascendieron a **64.692 tCO₂eq**, que correspondieron en su mayor parte al consumo de electricidad. Supone una disminución del 3% de las emisiones con respecto a 2021 (66.628 tCO₂eq.).

Greenhouse gas emissions in Codere in the 2021-2022 period (tCO ₂ eq) ⁴⁷			
	2021	2022	Evolution 2021-2022
Range 1⁴⁸	5,825	4,992	- 14% ⁴⁹
Range 2⁵⁰	60,803	59,700	- 2%

⁴⁷ Codere does not currently have the necessary systems in place to calculate the emissions of range 3.

⁴⁸ The emission factors used to calculate Range 1 have been extracted from [information updated at 2022](#) of the energy and climate change department of the UK government.

⁴⁹ The decrease of the emissions of range 1 is due, among other reasons, to a change of scope. For further information, please see the footnotes for the table on the Energy and water consumption of Codere in the 2021.2022 period (kWh)*

⁵⁰ The emission factors used to calculate Range 2 have been extracted from the information last published by the following sources by countries: Spain ([Red Eléctrica](#)) and Italy ([AIB](#)), Argentina ([Cammesa](#)), Colombia ([UPME](#)), Mexico ([Government of Mexico. Energy Regulatory Commission](#)), Uruguay ([Government of Uruguay](#)).



Waste reduction

Codere aspires to become an organization with **zero tolerance to plastic waste**. To that end, since 2019, the company has been undertaking several initiatives, among them **'Fuera Plástico'**. This program is intended to eliminate the use of plastic-bottled water at the offices by placing water dispensers in the common areas, delivering reusable glass bottles to the employees and installing recycling containers for the certified treatment of waste.

Throughout 2022, the company has made progress in this initiative, extending the distribution of reusable bottles to all the group's geographical locations and eliminate single-use plastics at the head offices in Argentina.

In the next few years, Codere intends to consolidate Fuera Plástico at all the business units. Thanks to this action, not only has the company reduced its use of plastic, it has also made an economic saving.

It is also to be mentioned that, due to the renovation of the headquarters of Codere in Alcobendas, the **former furniture was donated** to several groups⁵¹, and the employees were also able to use it free of charge for teleworking purposes.

Another of the initiatives on which the group has started to work, and which will contribute to a significant reduction of the waste generated by Codere, is **'Paperless'**. The purpose of this project is to reduce the use of paper through document digitalization, favoring new working processes in line with the cultural change of the organization, implying, inter alia, the adoption of a working model without fixed posts or paper. To implement this project, a series of stages has been established to know the life cycle of the documents and be able to establish the document maps and access protocols to

satisfy the digitalization needs of the various departments of the company.

Throughout 2022, Codere España has made progress in implementing this project. First, it proceeded to identify the historical documentation and separated that which need not be kept. In respect of future documentary practices, those applied by each area have been analyzed and the company is defining, with the IT department, the document managers and respective accesses to the documents by areas, generating data management synergies. These changes imply not only a considerable reduction of paper consumption but also a reduction of the access and location times, expediting the document signature process, among other things. The objective is for all areas to have available the document digital signature process with a document manager.

Codere also carries out several actions in the various geographical locations where it operates such as, for example, the cooperation of Codere Uruguay with Repapel, a foundation engaging in the **donation of paper, cardboard and recycled materials**, used to prepare school material and supplies which are donated to low-resource schools and rural areas of the country.

⁵¹ For further information, please consult Section 5.2 *Responsible to the community*.



06.2 Creation of value in our stakeholders

Codere holds a transparent and responsible relationship with its stakeholders, for a proper functioning of its activity and an optimum development of its business. For that purpose, it has various communication channels to ensure that it is aware of the expectations and concerns of its stakeholders with regard to the company, to be able to respond to them. The company works in this way to adapt its policies and strategies to the detected needs, in order to bring the business objectives and values in line with their points of view.

As a result of this dialogue, the group has identified **the main expectations of its stakeholders in the company**, met through the Corporate Social Responsibility Plan.

Stakeholders	Main expectations from Codere
Shareholders and investors	<ul style="list-style-type: none"> • Transparency and creation of sustainable value.
Customers	<ul style="list-style-type: none"> • Quality, variety and warranty of the gaming offer. • Technological innovation. • Protection of vulnerable groups. • Brand image.
Employees	<ul style="list-style-type: none"> • Stable employment. • Wellbeing and work-life balance. • Corporate culture and good name.
Partners	<ul style="list-style-type: none"> • Profitability. • Experience in the industry. • Transparency. • Good name and brand.
Suppliers	<ul style="list-style-type: none"> • Contract terms. • Mean payment period.
Communication media	<ul style="list-style-type: none"> • Transparency and knowledge of the gaming industry and the company. • Management of risk groups and social impact of the activity. • CSR.
Regulators	<ul style="list-style-type: none"> • Transparency, planning of the activity and protection of vulnerable groups.



The group encourages permanent and fluid dialogue with its stakeholders through its **corporate website** (www.grupocodere.com), the **reporting channel**⁵² and the **social networks**.

Indeed, Codere is active on the main social networks, through its corporate profiles and those of the various business units. The numbers of the group's community at the 2022 year end show Codere's reinforced position on the networks:



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(ir@codereonline.com), in addition to publishing in its website www.codereonline.com, all information relevant to the investor community and compulsory for the regulator (SEC), including a service of subscription to the news and notices.

Shareholders and investors⁵³

In addition to the information provided in the **corporate website** of the group, the company is in contact with its shareholders and institutional investors through the **Investor Office**, from which all consultations and requests are answered individually,

Codere also communicates with this group at the office located at the head offices of the company, and through the **telephone service** (+34 91 354 28 19) and **e-mail** (inversor@codere.com).

The company also affords shareholders and investors access to the presentations of quarterly results and other communications relevant for the market through **webcasts, telephone conference calls and via web**, besides organizing regular informative meetings on the progress of the group and other issues of interest.

In turn, Codere Online has its own investor relations channel by telephone +34 91 354 28 00 and through its e-mail

Customers

Codere has a customer support service through which it responds to the incidents and claims of its customers on the service provided. It includes a protocol that establishes the manner in which the claims received must be answered and resolved, specifying the procedure to review each request until it has been satisfactorily resolved.

Claims are received through different channels, depending on the type of customer:

- **Retail:** the claims generated in the in-person business (own or partner premises) are answered by telephone. These contacts represented this year 10% of the total volume of the service (5% in 2021).
- **Online:** the claims made by the end customer of the online business are received mainly through a digital chat. These customers may also get in touch by telephone and/or e-mail. These claims

⁵² The management of the reporting channel is further developed in Chapter 4.2 *Compliance*.

⁵³ The general channels of information and communication with investors are further developed in chapter 4.7 *Commitment to shareholders and investors*.



represented 90% of the volume of the service this year.

In 2022, Codere received a total 88,793 claims and incident resolution requests through the aforementioned channels (in comparison with the 96,707 received in 2021).

The organization also encourages dialogue with its customers through the commercial websites of the various businesses and their points of sale and through customer satisfaction surveys.

Employees⁵⁴

The group conveys to its employees a training offer through the TransFórmate platform, particularly in Latin America, and through Codere Personas Digital (Cornerstone).

The company also promotes several tools for the dissemination of information, meeting and development of group members, including **Codere Actualidad**, the corporate newsletter that is published monthly, which throughout the year has published more than 60 articles on the company; and **Codere Informa**, a tool to issue communiqués through the corporate e-mail, which sent 200 in 2022.

In April 2022, the company discontinued **Codere en Positivo**, a virtual area created especially as a meeting point during the pandemic, which included information on miscellaneous matters, some of which have been maintained in other channels, such as the corporate newsletter.

The information that is most relevant for collaborators is also accessible from the various **intranets** implemented, both at centrally and in the group business units.

Suppliers

In order to reinforce **supplier relations**, in addition to the contacts already held in the context of the negotiation and contracting activities, Codere is working to set up **SAP ARIBA** platform for the integrated management of the purchases process. This platform will permit more efficient relations, expediting the validation processes, tenders and offers or invoicing, among other issues.

At the start of 2023 the new purchases/IT purchases procedure commenced, for an easier coordination between the areas involved and to improve the response times and efficiency in the process.

Media

Codere has a **Corporate Communication Department**, where the informative activity of the group is centralized. The communication media may get in touch directly with this department, which meets any request for information fast and transparently.

Throughout the year, the group sent 39 corporate press releases, which may be accessed from the “Press Room” enables in the Codere website, in addition to those sent locally at several business units.

Regulators

The company holds close, direct and transparent relations with the regulators, from various areas and through several channels, although this is the main function of the Institutional Relations Department. This task has become particularly relevant recently due to the pandemic and the need to adapt the company to the requirements established by the public authorities in the various countries and to the new local gaming organization and regulations.

⁵⁴ The internal communication tools and the main communication actions of 2022 are further developed in chapter 5.3.3 *Committed to talent*.



06.2.1 Creating common value

In compliance with the *Corporate Social Responsibility Policy*, Codere promotes the fair remuneration of all groups contributing to the success of its business project, stipulating a significant generation of richness in its main stakeholders. In 2022, the company distributed among its stakeholders more than 1,400 million euros.

Creation of value in stakeholders of Codere in 2022 (millions of euros)

Economic value generated by the company	1,314.81
Economic value distributed to stakeholders	1,413.69
Employees (payment of salaries)	266.99
Suppliers (purchases and procurement)	460.07
Shareholders (payment of dividends)	3.05
Public administrations (payment of taxes and duties)	629.60
Financial institutions (payment of interest)	53.98
Economic value retained by the company (A-B)	-98.88



Tax contribution

As shown in the above section, the various taxes paid by Grupo Codere in the countries in which it operates are a major contribution to sustain the public treasury and, thus, to society.

The total tax contribution of Grupo Codere in 2022 was 481 million euros, including only taxes borne, i.e., taxes that imply a cost for the group.

Among these taxes, we may point out **gaming tax** (under its various headings), with which the group contributed 386.9 million euros to the local treasuries of the countries in which it operates. In terms of tax on profit, the contribution by the company to the treasuries of the different countries amounted to 13.3 million euros in 2022.

Also, Codere has to meet other **real estate or economic activity taxes**, representing approximately 61.9 million euros in the results of the group in 2022.

It must be pointed out that Codere bears a relevant cost for **Value Added Tax** and similar

indirect taxes since, because gaming is an activity exempt from indirect taxation in most of the countries in which it operates, it is unable to deduct, or thus recover, most of the tax borne, implying a VAT expense of 18.5 million euros.

In addition, Codere makes other contributions of taxes, which it collects for the account of third parties, the most significant being the payments for tax withholdings on wages and salaries, amounting to 25 million euros; and contributions to social security, both for the account of the employee and for the employer, and making up 52.8 million euros.

Codere also collected in 2022 withholdings for the account of customers and suppliers in a total amount of 54.3 million euros. Additionally, it collected VAT in an amount of 16.9 million euros.

Taxes borne by Codere group in millions of euros (2020 -2021 - 2022)

	2020	2021	2022
Gaming tax contribution	182.5	215.4	386.9
Other taxes	27.8	37.5	61.9
Non-deductible VAT	13.7	17.4	18.5
Corporate Income Tax	7.6	12.7	13.3
TOTAL	231	283	481



**Tax contribution for Corporate Income Tax of Codere group in millions of euros
(2020 - 2021 - 2022)**

Millions of euros	Payment of taxes of equivalent			Withholding tax paid			Others			Total		
	2020	2021	2022	2020	2021	2022	2020	2021	2022	2020	2021	2022
Argentina	1.5	0.2	0.5	0.8	0.6	3.7	3.9	0.5	1.9	2.6	4.7	6.0
Mexico	1.8	0.7	0.4	0.8	3.0	2.5	0.0	0.0	0.0	2.6	3.7	2.9
Colombia	0.0	0.0	0.2	0.3	0.6	0.4	0.0	0.0	0.0	0.4	0.6	0.6
Spain	1.0	2.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	2.0	1.0
Italy	0.0	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2
Luxembourg	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0
Panama	0.1	0.0	0.0	0.2	0.3	0.5	0.0	0.0	0.0	0.3	0.3	0.5
Uruguay	0.7	1.0	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.7	1.1	0.4
Israel	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0
Online	0.0	0.0	0.7	0.0	0.0	0.9	0.0	0.0	0.0	0.0	0.0	1.6
Headquarter	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1
TOTAL	5.0	4.2	3.4	2.2	4.6	8.0	4.0	3.9	1.9	7.6	12.7	13.3

Profit before taxes per country in millions of euros (2020-2021-2022)

País	2020	2021	2022
Spain	-23.5	-4.9	8.3
Mexico	-130.6	-67.5	-122.8
Argentina	-24.9	-27.8	63.5
Colombia	-11.8	-3.4	0.4
Italy	-35.0	-23.4	1.5
Uruguay	6.2	-4.2	6.5
Brazil	-0.4	-0.2	-0.1
Panama	-27.9	-14.9	-17.6
Parents	-4.7	-148.0	-96.5
Online	-8.8	-63.9	-191.3
TOTAL	-261.4	-358.1	-348.1



06.3 Responsibility in the supply chain

The Purchases area of the company works to promote an **efficient, transparent and sustainable purchases management**, as the lever to ensure customer satisfaction and generate competitive advantages.

Codere considers its suppliers to play an essential role in the performance of the business, since it is they who provide the materials, services and technologies that are basic for its activity. The company has designed a model to ensure that certain guidelines are followed throughout the purchases process, from the detection of the need for a purchase, to the validation and reception of the product or service.

As part of the purchases model, efficiency, quality and commitment policies are applied, including aspects related to the sustainable performance of the business and improvement

of the prevention of risks caused by inadequate conduct on the part of the supplier or of the company's employees.

Codere is firm in its commitment to ongoing improvement in the management of its suppliers which is why it works year after year on reinforcing its internal tools by implementing projects to optimize and digitalize the processes.

One of the main features of year 2022 is the return back to normal of the management of the supply chain after the impact of the pandemic the years before, when the company had to apply extraordinary measures.

“Codere promotes an efficient, transparent and sustainable purchases management, to ensure customer satisfaction and generate competitive advantages”



06.3.1 Description of the supply chain

Codere’s supply chain is made up of 8,840 suppliers responsible for providing the products and services necessary to meet the various needs of the group (compared with its 5,616 suppliers in 2021).

For a better analysis by areas and a more efficient treatment within the entire global purchases processes, the company classifies its suppliers in the following five groups:

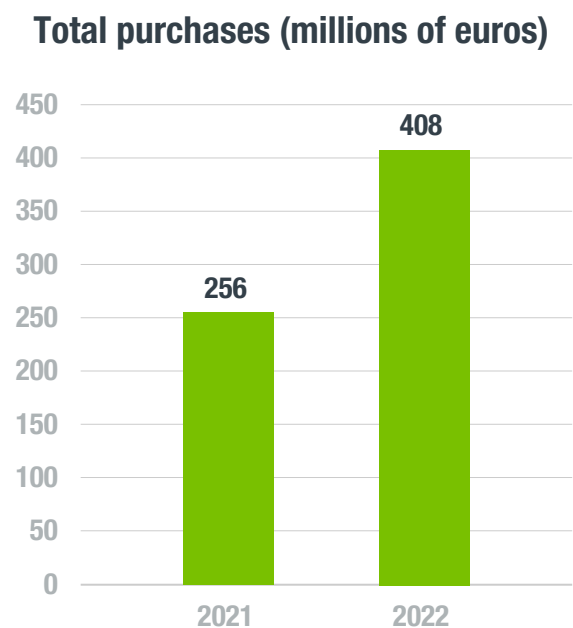
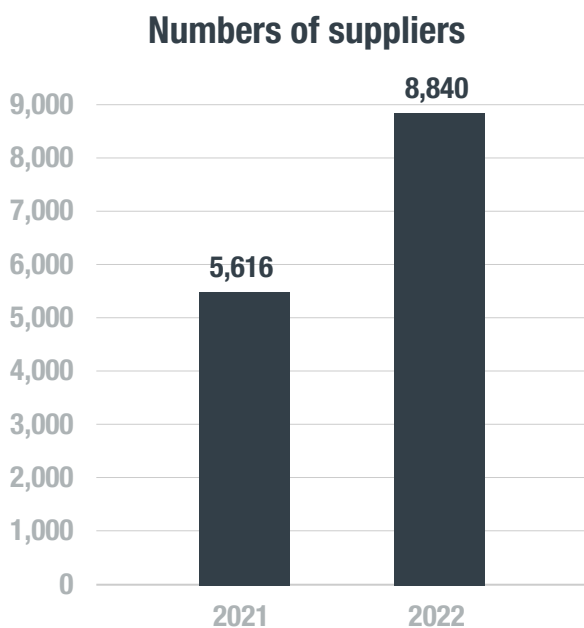
- **Purchase of gaming terminals**
- **Purchase of the online business**, consisting mainly of the acquisition of online games and their critical components.
- **Purchase of betting terminals**
- **Technological purchases**, for IT tools available to employees and the procurement of external services for maintenance and development of the betting platform.

- **Utilities and other purchases** such as telephone services, marketing, consumptions, spare parts, vehicles, trips, etc.

The total purchases made by Codere in the several markets in which it is present, amounted to 408 million euros, a 59% increased in respect of 2021. The company maintained a line of management of expenses in purchases in 2022, giving priority to the most strategic projects. Likewise, the growth in the number of suppliers and the volume of purchases is due to the development strategy of the areas and to a trend towards normality in general (rents have not been reduced, and other expenses that had been adjusted are gradually returning to their pre-pandemic situation).

Also, in view of the **current global crisis of the supply chain**, which is causing a scarcity of all kinds of goods and an exponential increase of shipping costs, Codere has adopted a proactive position, advancing orders and opting for prolonging the useful life of its equipment.

Evolution of Codere suppliers and purchases volume



* Data for the five headings of purchases and procurement mentioned (includes all purchases of all countries, except for purchases of terminals of Gibraltar, Malta and Israel, since these are online businesses. The purchase data in currencies other than euro have been exchanged into euro, applying the average exchange rates each year.



06.3.2 Efficient, transparent and sustainable purchases management

One of the areas in which the efforts made to improve efficiency have had the most reach, is the supply chain, since a major step was taken this year, not only with the digitalization of some of its internal processes but also for the implementation of processes permitting a better coordination between the purchases department and the Legal Department.

Purchasing and procurement process

The Codere **Purchasing Policy and Procedure Handbook** defines the principles underlying the purchasing practices of the business, including the boundaries of expenses and investments in suppliers.

The global procurement model in the company is supervised by the General Management and by the Purchases Management, although various areas (Data Protection, Legal Area, etc.) participate in the process. The model is based on five pillars: purchases function, virtual procurement board, procurement function, payment management and framework agreements.

In January 2023, the company started to implement its **Protocol for review of Contracts and Purchases/IT Purchases Process**. This internal procedure is activated before the service is provided. Its purpose is to expedite the coordination between the areas involved and give a fast, efficient and consistent answer to the consultations made in the process. It involves the following stages: proposal, validation, review, preparation of contractual documents and engagement. In turn, the procedure improves the response times, having a positive effect on the general flow

Supplier validation

Codere has in place a **Supplier Validation Process**. This is a determining stage for the suppliers to be able to supply their products or services to the company. It is an integrated process in which the Compliance Management, Legal Counsel, DPO, Internal Audit and the General Management of the company participate.

In this process, each area that has to procure or acquire goods or services must define the minimum requirements that the suppliers must meet, taking into account the needs of each business and compliance with the regulations.

The Procurement Board is responsible for coordinating the information required for the verification and validation of the suppliers. Codere thus ensures that it has a supplier network whose activities and services meet the strictest standards of suitability, solvency, honorability and compliance with applicable law.

Since the gaming industry is subject to an exhaustive regulatory framework, the supplier validation process is highly relevant for the company and is considerably complex. In this regard, gaming terminal suppliers must be registered as manufacturers/importers at the gaming registries of the various regions, and have the validations and registrations of the models to market them.

Likewise, suppliers of online games and their critical components must have a license in those countries where this is compulsory by law, as an own component of the Codere gaming platform through a trial for inclusion of the supplier in the platform authenticated by the laboratory



Supply chain management digitalization

The digitalization of the supply chain management improves its efficiency while reducing the flow of documents and expediting the response times. Because of this, Codere has several projects in progress for the purpose, such as:

- Supplier management centralization, using platforms to optimize the management of the suppliers of certain products, reducing the costs and simplifying the office work.
- Implementation of the SAP ARIBA management platform, to automate the purchases process through a platform in the cloud. The improvements made will become more patent gradually as new modules are implemented directly related to procurement and management of the demand.
- Strengthening of VIM (Vendor Invoice Management), a platform that permits a more orderly and effective cost management, thanks to the digitalization of the administrative payment accounting and management process.

Also, in its ambition to contribute to the progress of the areas where it performs its business, Codere considers the **development of relations with local suppliers** a priority and, whenever possible, it places its orders for goods and services with them. In this way, the group manages to reduce the costs and its operational risk with shorter product delivery terms, while establishing stable relationships of trust at the local level.

Throughout 2022, the company worked with a large proportion of local suppliers in each of the classes of purchases mentioned above, a percentage between 70% and 100% in several countries for technological purchases; in purchases of gaming machines, between 80% and 100%⁵⁶; in purchases of online business over 86%⁵⁷; and, for other purchases the percentage of purchases from local suppliers is between 50% and 100%^{58 59}.

In addition, under the umbrella of the Corporate Social Responsibility Plan, Codere has made agreements with companies that engage **employees with disabilities**² to provide external services, such as the hall and office cleaning service.

Responsibility to the supply chain

Codere has a regulatory framework in place to ensure the maximum responsibility in its value chain, consisting of the **Code of Ethics and Integrity**, the **Anticorruption Policy** and the **Corporate Social Responsibility Policy**, which establish the basic principles underlying the management of the supply chain. Thanks to this, the group ensure that its supplier relations are based on ethical conduct and compliance with legislation in force.

⁵⁵ Argentina (100%), Spain (99%), Mexico (88%), Colombia (88%), Panama (92%) and Uruguay (70%).

⁵⁶ Argentina (100%), Spain (80%)

⁵⁷ Corporate (98%), Spain (93%), Colombia (91%), Argentina (90%), Mexico (87%), Panama (86%), Italy (86%).

⁵⁸ Argentina (100%), Spain (99%), Colombia (98%), Mexico (97%), Panama (95%), Uruguay (60%) and Corporate (50%).

⁵⁹ Codere does not have the necessary systems to calculate the percentage of local suppliers for all classes of purchases in all countries.

² See in further depth in Chapter 5.3 *People, the driving force of change*.



Annexes



Annex I This report and materiality matrix

This 2022 Codere *Integrated Report* has been prepared according to the new *selected Global Reporting Initiative (GRI) standard*. With this focus, the company seeks to improve the quality of the information it conveys to its stakeholders regarding non-financial reporting and diversity, responding in this document to applicable legislation.

The information of the report refers to the company's activities from January 1, 2022, to December 31, 2022, and to the main impacts of the operations on its stakeholders.

The report has been prepared taking into account the guidelines and principles of the GRI standard, such as:

- **Stakeholder inclusiveness.** The report has been prepared taking into account the stakeholders' expectations with regard to the functioning of Codere. For that purpose, in addition to assessing through the persons responsible for the company the main expectations already detected, various bodies have analyzed several publications on the sector, which develop the topics most significant for the stakeholders.
- **Sustainability context.** The impact of the activities on the social, economic and environmental context in which the company operates has been assessed.

- **Materiality.** The materiality report of the company has been updated to define the topics that the company considers most significant. The method used may be consulted below in this section.
- **Completeness.** After updating the issues that are material for Codere, information on these issues has been included throughout the report, allowing the stakeholders to assess the company's economic, environmental and social performance in the past years.

In addition, the GRI principles established to ensure the quality of the information have also been taken into account throughout the report:

- **Accuracy.** Accurate information has been reported allowing the stakeholders to assess the company's performance.
- **Balance.** Both the positive and the negative aspects of the activity have been reflected, thus conveying a complete and objective view of Codere.
- **Clarity.** The information provided is comprehensible, clear and accessible by the stakeholders using the report.
- **Comparability.** The information has been compiled and reported consistently to enable the stakeholders to analyze that information and compare it easily with that of other organizations.



- **Reliability.** The process used to prepare this report has been explained ensuring the traceability of its contents to be able to submit the information to both internal and external review.
- **Timeliness.** The content of the report will be updated annually in order to make information available to the stakeholders in time.

Annex IV includes a *Selected GRI table of content* providing a list of the reported indicators and the pages where the information may be found. In some cases, the GRI indicators relating to the reported indicators and not entirely answered.

Meeting the GRI standard, Codere updated in 2021 the materiality analysis to assess the topics that are most relevant for Codere and its stakeholders.

The analysis has used as a basis the list of sustainability topics proposed by the new standards published by GRI, considering also other relevant aspects, both for the company and for its stakeholders, identified in the various sources considered in the analysis:

- Meetings held with managers and executives of the company’s key areas.
- Analysis of internal documents of the company: policies, handbooks, presentations, action plans, stakeholder expectations assessment and other relevant documents in this respect.
- Press releases on the company in 2022.
- Consideration of the main legislative initiatives and policies related to sustainability and non-financial aspects, such as the Sustainable Development Objectives (SDO).

On the basis of the above, the materiality matrix of the company has been updated pointing out 18 key material topics for Codere and its stakeholders.

Codere Materiality Matrix

<p>Critical topics</p> <ul style="list-style-type: none"> • Prevention and adaptation to COVID-19 impacts • Compliance and crime prevention • Rationalization of advertising 	<ul style="list-style-type: none"> • Cybersecurity and personal data protection • Promotion of responsible gambling • Political risk and regulatory and tax pressure
<p>Relevant topics</p> <ul style="list-style-type: none"> • Brand image and positioning • Operational efficiency • Innovation and digitalization • Corporate governance 	<ul style="list-style-type: none"> • Customer knowledge and access • Consolidation in strategic markets • Reputational or public opinion risk
<p>Other relevant topics</p> <ul style="list-style-type: none"> • Promotion of the culture and values of the organization • Relations with the community and other stakeholders • Environmental performance 	<ul style="list-style-type: none"> • Talent development and management • Working environment, diversity and equality • Supply chain management



The above material topics are classified below according to the impact of each one of them within and/or outside the organization according to the GRI standard requirement.

Coverage of material topics

Classification	Material topic	Material topic coverage	
		In the organization	Outside the organization
Economic	Brand image and positioning		X
	Knowledge of and access to customers		X
	Operational efficiency	X	
	Consolidation in strategic markets	X	
Environmental	Environmental performance		X
Social	Promotion of responsible gaming		X
	Talent development and management	X	
	Working environment, diversity and equality	X	
	Relations with the community and other stakeholders		X
Ethics and governance	Compliance and crime prevention	X	
	Cybersecurity and personal data protection	X	X
	Corporate governance	X	
	Investor relations		X
Others	Political risk and regulatory and tax pressure	X	X
	Innovation and digitalization	X	
	Reputational and public opinion risk	X	X
	Promotion of the culture and values of the organization	X	
	Supply chain management		X
	Rationalization of advertising	X	X
	Prevention and adaptation to COVID-19 impacts	X	X



Annex II Breakdown of human resources indicators

The distribution of Codere’s workforce (by gender, age, professional group and geographical distribution) is shown below, in addition to their distribution by type of contract, average remuneration and pay gap. The following table also shows the percentage of employees subject to collective bargaining agreement, hours of training per professional group and absenteeism indicators. The breakdown refers to information on Codere group as a whole.

Codere workforce by gender

Gender	2021		2022		Evolution 2021-2022
	Total ⁶⁰	% ⁶¹	Total	%	%
Women	4,336	40.69%	4,498	40.72%	4%
Men	6,321	59.31%	6,548	59.28%	4%
TOTAL	10,657	100%	11,046	100%	4%

Codere workforce by age

Age	2021	2022	Evolution 2021-2022
<30 years	2,169	2,401	11%
30-39 years	4,032	3,958	-2%
40-50 years	3,119	3,304	6%
>50 years	1,337	1,383	3%
TOTAL	10,657	11,046	4%

⁶⁰ Gender distribution information updated in respect of the 2021 report, after the model was reviewed.

⁶¹ Gender distribution percentages updated in respect of the 2021 report, after the model was reviewed.



Codere workforce by professional group

	2021		2022	
	Total	%	Total	%
Senior executive	10	0.09%	13	0.12%
Executive	96	0.90%	108	0.98%
Middle management	1,890	17.73%	1,906	17.26%
Technical	1,842	17.28%	1,993	18.04%
Office	479	4.49%	455	4.12%
Operational	6,340	59.49%	6,571	59.49%
TOTAL	10,657	100%	11,046	100%

Codere workforce by geographical distribution

	2021		2022	
	Employees	%	Employees	%
Corporate	184	1.73%	183	1.66%
Spain	1,139	10.69%	1,171	10.60%
Argentina	2,589	24.29%	2,668	24.15%
Colombia	348	3.27%	407	3.68%
Italy	797	7.48%	846	7.66%
Mexico	3,614	33.91%	3,620	32.77%
Panama	921	8.64%	1,004	9.09%
Uruguay	993	9.32%	1,070	9.69%
Gibraltar	1	0.01%	1	0.01%
Israel	37	0.35%	41	0.37%
Malta	34	0.32%	34	0.31%
Luxembourg	-	-	1	0.01%
TOTAL	10,657	100%	11,046	100%



Total number and distribution of types of employment contract by gender

	2021 ⁶²				2022			
	Men	Women	Total	%	Men	Women	Total	%
PERMANENT CONTRACT	6,031	4,040	10,071	94.50%	6,229	4,267	10,496	95.02%
Full time	5,667	3,403	9,070	85.11%	5,764	3,489	9,253	83.77%
Part time	364	637	1,001	9.39%	465	778	1,243	11.25%
TEMPORARY CONTRACT	290	296	586	5.50%	319	231	550	4.98%
Full time	246	259	505	4.74%	254	187	441	3.99%
Part time	44	37	81	0.76%	65	44	109	0.99%
TOTAL	6,321	4,336	10,657	100%	6,548	4,498	11,046	100%

Total number and distribution of types of contract by age

	2021				2022			
	Under 30	Between 30 and 39	Between 40 and 50	Over 50	Under 30	Between 30 and 39	Between 40 and 50	Over 50
PERMANENT CONTRACT	1,820	3,876	3,059	1,316	2,108	3,785	3,245	1,358
Full time	1,515	3,493	2,817	1,245	1,601	3,377	2,991	1,284
Part time	305	383	242	71	507	408	254	74
TEMPORARY CONTRACT	349	156	60	21	293	173	59	25
Full time	309	135	50	11	240	145	42	14
Part time	40	21	10	10	53	28	17	11
TOTAL	2,169	4,032	3,119	1,337	2,401	3,958	3,304	1,383

⁶² Gender distribution of permanent contracts updated in respect of the 2021 report, after the model was reviewed.



Total number and distribution of types of employment contract by professional group

	Alta dirección		Directivos		Mandos intermedios		Técnicos		Administración		Operativos	
	2021	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021	2022
PERMANENT CONTRACT	10	13	96	107	1,873	1,883	1,792	1,950	457	443	5,843	6,100
Full time	10	13	96	106	1,863	1,871	1,707	1,848	400	392	4,994	5,023
Part time	-	-	-	1	10	12	85	102	57	51	849	1,077
TEMPORARY CONTRACT	-	-	-	1	17	23	50	43	22	12	497	471
Full time	-	-	-	1	15	21	49	43	20	10	421	366
Part time	-	-	-	-	2	2	1	-	2	2	76	105
TOTAL	10	13	96	108	1,890	1,906	1,842	1,993	479	455	6,340	6,571

Total number and distribution of types of employment contract by geographical distribution

2021												
	Corporate	Spain	Argentina	Colombia	Italy	Mexico	Panama	Uruguay	Gibraltar	Israel	Malta	Luxembourg
PERMANENT CONTRACT	174	1,107	2,636	326	708	3,511	874	926	1	35	38	-
Full time	162	1,039	2,056	326	501	3,372	827	874	1	33	37	-
Part time	12	68	580	-	208	139	46	51	-	2	1	-
TEMPORARY CONTRACT	2	62	1	-	60	210	5	14	-	-	-	-
Full time	-	43	1	-	28	210	5	13	-	-	-	-
Part time	-	19	-	-	32	-	-	1	-	-	-	-
TOTAL	175	1,168	2,637	326	768	3,721	879	939	1	35	38	-

2022												
	Corporate	Spain	Argentina	Colombia	Italy	Mexico	Panama	Uruguay	Gibraltar	Israel	Malta	Luxembourg
PERMANENT CONTRACT	182	1,142	2,667	407	715	3,239	997	1,070	1	41	34	1
Full time	172	1,089	2,146	407	521	3,149	949	746	1	38	34	1
Part time	10	53	521	-	194	90	48	324	-	3	-	-
TEMPORARY CONTRACT	1	29	1	-	131	381	7	-	-	-	-	-
Full time	-	15	1	-	37	381	7	-	-	-	-	-
Part time	-	14	-	-	94	-	-	-	-	-	-	-
TOTAL	183	1,171	2,668	407	846	3,620	1,004	1,070	1	41	34	1



Average types of employment contract by gender

	2021 ⁶³			2022		
	Men	Women	Total	Men	Women	Total
PERMANENT CONTRACT	6,191	4,144	10,335	6,110	4,094	10,204
Full time	5,769	3,458	9,227	5,711	3,438	9,149
Part time	422	686	1,108	399	656	1,055
TEMPORARY CONTRACT	207	144	351	334	251	585
Full time	176	124	300	279	209	488
Part time	31	20	51	55	42	97
TOTAL	6,398	4,288	10,686	6,444	4,345	10,789

Average types of employment contract by age

	2021				2022			
	Under 30	Between 30 and 39	Between 40 and 50	Over 50	Under 30	Between 30 and 39	Between 40 and 50	Over 50
PERMANENT CONTRACT	2,011	4,035	3,011	1,278	1,874	3,815	3,168	1,348
Full time	1,639	3,626	2,759	1,203	1,529	3,420	2,921	1,279
Part time	372	409	252	75	345	395	247	69
TEMPORARY CONTRACT	178	105	46	22	314	180	66	27
Full time	155	90	40	15	266	154	53	16
Part time	23	15	6	7	48	26	13	11
TOTAL	2,189	4,140	3,057	1,300	2,188	3,995	3,234	1,375

Average types of employment contract by professional group

	Senior executive		Executive		Middle management		Technical		Office		Operational	
	2021	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021	2022
PERMANENT CONTRACT	10	13	94	106	1,898	1,888	1,729	1,888	478	449	6,124	5,861
Full time	10	13	94	106	1,887	1,875	1,632	1,795	413	396	5,189	4,964
Part time	-	0	0	0	11	13	97	93	65	53	935	897
TEMPORARY CONTRACT	-	-	0	0	16	25	74	60	20	21	242	480
Full time	-0	-	0	0	14	23	73	59	17	18	197	389
Part time	0	-	0	-	2	2	1	1	3	3	45	91
TOTAL	10	13	94	106	1,914	1,913	1,803	1,948	498	470	6,366	6,341

⁶³ Gender distribution information updated in respect of the 2021 report, after the model was reviewed.



Average types of employment contract by geographical distribution

2021												
	Corporate	Spain	Argentina	Colombia	Italy	Mexico	Panama	Uruguay	Gibraltar	Israel	Malta	Luxembourg
PERMANENT CONTRACT	174	1,107	2,636	326	709	3,511	873	925	1	35	38	-
Full time	162	1,039	2,056	326	501	3,372	827	874	1	33	37	-
Part time	12	68	580	0	208	139	46	51	0	2	1	-
TEMPORARY CONTRACT	2	62	1	-	60	210	5	14	-	-	-	-
Full time	2	43	1	-	28	210	5	13	-	-	-	-
Part time	-	19	-	-	32	-	-	1	-	-	-	-
TOTAL	176	1,169	2,637	326	769	3,721	878	939	1	35	38	-

2022												
	Corporate	Spain	Argentina	Colombia	Italy	Mexico	Panama	Uruguay	Gibraltar	Israel	Malta	Luxembourg
PERMANENT CONTRACT	183	1,129	2,589	389	700	3,245	974	918	1	40	35	1
Full time	173	1,073	2,112	389	513	3,141	927	747	1	37	35	1
Part time	10	56	477	0	187	104	47	171	-	3	0	-
TEMPORARY CONTRACT	2	51	1	-	124	400	8	-	-	-	-	-
Full time	2	38	1	-	43	398	7	-	-	-	-	-
Part time	0	13	-	-	81	2	1	-	-	-	-	-
TOTAL	185	1,180	2,590	389	824	3,645	982	918	1	40	35	1

Exits⁶⁴ by gender

	2021	2022
Women	304	503
Men	555	708
TOTAL	859	1,211

Exits⁶⁵ by age

	2021	2022
Under 30	339	493
Between 30 and 39	306	445
Between 40 and 50	150	171
Over 50	64	102
TOTAL	859	1,211

⁶⁴ The number of exits computes only forced leaves.

⁶⁵ The number of exits computes only forced leaves.



Exits⁶⁶ by professional group

	2021	2022
Senior executive	1	-
Executive	2	2
Middle management	136	151
Technical	93	121
Office	13	20
Operational	614	917
TOTAL	859	1,211

Average remuneration in euros and pay gap by gender⁶⁷

	2021 ⁶⁸		2022	
	Total (euros)	Pay gap	Total (euros)	Pay gap
Women	17,246	23%	20,174	23%
Men	13,328		15,614	
Total average salary	15,652		18,317	

Average remuneration⁶⁹ by age, in euros

	2021	2022
Under 30	8,592	10,724
Between 30 and 39	13,499	15,305
Between 40 and 50	19,503	22,984
Over 50	24,615	28,970
Total average salary	15,652	18,317

⁶⁶ The number of exits computes only forced leaves.

⁶⁷ The average remuneration has been calculated considering the payroll at the year end, and both fixed and variable remuneration, analyzing the amount (taking into account the time effectively worked by the employees in the year). In addition to the fixed and variable remuneration, the information contemplates the benefits received by the employees. On the basis of the measured remuneration, the pay gap has been calculated using the following formula: Pay gap = 1 - (average remuneration of women / average remuneration of men).

⁶⁸ Information on average remuneration by gender updated in respect of the 2021 report, after the model was reviewed.

⁶⁹ The average remuneration has been calculated considering the payroll at the year end, and the annual theoretical (increased to 100% in the case of reduced working hours), taking into account the fixed remuneration, variable remuneration and benefits.



Average remuneration⁷⁰ by professional group, in euros

	2021	2022
Senior executive	367,513	457,041
Executive	127,066	156,701
Middle management	23,130	27,325
Technical	16,862	18,530
Office	18,612	20,205
Operational	10,606	12,367
Total average salary	15,652	18,317

Average remuneration by gender, professional group and age, in euros, including the pay gap⁷¹ 2021

	Under 30				Between 30 and 39			
	Men	Women	Total	Pay gap	Men	Women	Total	Pay gap
Senior executive	-	-	-	-	-	-	-	-
Executive	-	-	-	-	123,997	94,862	104,574	23%
Middle management	9,950	11,933	10,697	-20%	18,561	16,362	17,660	12%
Technical	11,988	12,997	12,298	-8%	16,069	17,666	16,497	-10%
Office	12,107	11,199	11,663	7%	17,247	18,718	18,153	-9%
Operational	7,604	7,135	7,356	6%	10,891	10,603	10,748	3%
TOTAL	8,937	8,211	8,592	8%	13,876	13,023	13,499	6%

	Between 40 and 50				Over 50			
	Men	Women	Total	Pay gap	Men	Women	Total	Pay gap
Senior executive	337,207	-	337,207	NA⁷²	387,717	-	387,717	NA⁷³
Executive	131,034	111,932	125,463	15%	141,169	87,043	134,230	38%
Middle management	28,512	22,697	26,686	20%	35,458	31,579	34,752	11%
Technical	17,948	21,487	18,783	-20%	20,958	23,788	21,602	-14%
Office	18,251	21,326	20,294	-17%	25,196	21,976	22,807	13%
Operational	12,931	11,489	12,339	11%	14,470	9,843	13,221	32%
TOTAL	20,932	17,055	19,503	19%	27,208	17,734	24,615	35%

⁷⁰ The average remuneration has been calculated considering the payroll at the year end, and the annual theoretical (increased to 100% in the case of reduced working hours), taking into account the fixed remuneration, variable remuneration and benefits.

⁷¹ The average remuneration has been calculated considering the payroll at the year end, and annual theoretical (increased to 100% in the case of reduced working hours), taking into account the fixed remuneration, variable remuneration and benefits. On the basis of the measured remuneration, the pay gap has been calculated using the following formula: Pay gap = 1 - (average remuneration of women / average remuneration of men).

⁷² The pay gap calculation does not apply to senior management since, in terms of gender, this group is made up only by men. Since there are no women, the pay gap calculation does not apply.

⁷³ The pay gap calculation does not apply to senior management since, in terms of gender, this group is made up only by men. Since there are no women, the pay gap calculation does not apply.



Average remuneration by gender, professional group and age, in euros, including the pay gap⁷⁴ 2022⁷⁵

	Under 30				Between 30 and 39			
	Men	Women	Total	Pay gap	Men	Women	Total	Pay gap
Senior executive	-	-	-	-	-	-	-	-
Executive	-	-	-	-	114,746	142,556	133,286	-24%
Middle management	11,950	12,469	12,154	-4%	21,196	19,652	20,577	7%
Technical	13,483	14,466	13,751	-7%	18,367	19,097	18,578	-4%
Office	13,392	13,814	13,608	-3%	19,274	19,791	19,586	-3%
Operational	9,378	10,039	9,717	-7%	12,478	11,984	12,234	4%
Total	10,673	10,784	10,724	-1%	15,780	14,705	15,305	7%

	Between 40 and 50				Over 50			
	Men	Women	Total	Pay gap	Men	Women	Total	Pay gap
Senior executive	470,390	-	470,390	NA ⁷⁶	451,107	-	451,107	NA ⁷⁷
Executive	167,344	133,313	157,013	20%	167,511	92,651	159,374	45%
Middle management	33,886	28,285	32,040	17%	39,444	33,112	38,264	16%
Technical	19,666	22,573	20,367	-15%	22,001	25,926	22,886	-18%
Office	19,534	22,960	21,724	-18%	27,153	24,024	24,851	12%
Operational	14,803	13,530	14,251	9%	15,949	11,218	14,635	30%
Total	24,830	19,997	22,984	19%	32,569	19,365	28,970	41%

Average remuneration of directors and executives (euros)

	2021		2022	
	Men	Women	Men	Women
Senior Executive⁷⁸	367,513	-	457,041	-

⁷⁴ The average remuneration has been calculated considering the payroll at the year end, and annual theoretical (increased to 100% in the case of reduced working hours), taking into account the fixed remuneration, variable remuneration and benefits. On the basis of the measured remuneration, the pay gap has been calculated using the following formula: Pay gap = 1 - (average remuneration of women / average remuneration of men).

⁷⁵ The information shows that the pay gap for workers under 30 has improved while that for workers between 40 and 50 remains in terms similar to those of 2021. In the case of collaborators over 50, the pay gap increase is due mainly to its increase in the executive group. This is a small group of workers in which any variation, for example for mobility reasons or age ranges, has considerable influence on the pay gap calculation.

⁷⁶ The pay gap calculation does not apply to senior management since, in terms of gender, this group is made up only by men. Since there are no women, the pay gap calculation does not apply.

⁷⁷ The pay gap calculation does not apply to senior management since, in terms of gender, this group is made up only by men. Since there are no women, the pay gap calculation does not apply.

⁷⁸ Senior executives include the following profiles: the most senior executive of the company (the group CEO) and persons reporting directly to the CEO (regional managers, country managers, COOs and other top executives).



Employees subject to sector or specific collective bargaining agreements

Countries	2021	2022
Corporate ⁷⁹	100%	100%
Spain ⁸⁰	77%	74%
Argentina	82%	79%
Colombia	27%	20%
Italy	100%	99%
Mexico	28%	42%
Panama	18%	16%
Uruguay	94%	80%
Gibraltar	0%	0%
Israel	0%	0%
Malta	0%	0%
Luxembourg	-	0%

Hours of training received by professional group⁸¹

	2021	2022	Evolution 2021-2022 ⁸²
Senior executive	150	73	-51%
Executive	1,142	1,147	0%
Middle management	23,357	25,597	10%
Technical	11,072	9,220	-17%
Office	5,785	4,972	-14%
Operational	31,164	52,392	68%
TOTAL	72,669	93,401	29%

⁷⁹ The employees included in "Corporate" are those of the company's central services.

⁸⁰ The employees in the group "Spain" are those present mostly in the business lines of type "B" slot machines, bingo and own gaming premise. The percentage of employees under collective bargaining agreement in this last line is lower than 100%, since no specific agreement exists for the gaming industry in the country. In any case, the employees have their rights as workers safeguarded by reference labor law. 77% of the employees under a collective bargaining agreement are subject to those in force for other industries, such as hospitality, trade or iron and steel, among others. In addition, 19.2% of the payroll of Codere España is covered by the action of local Health and Safety Committees.

⁸¹ The hours shown are hours of training (both online and in person) afforded on the various matters such as processes, skills, regulation, risk prevention, CSR, office automation and languages. The scope of the information excludes Israel, Malta and Gibraltar, countries that do not yet have a reliable reporting system, waiting for implementation of Codere Personas Digital (Cornerstone) in these countries.

⁸² In 2022, the implementation of Codere Personas Digital (Cornerstone) in 4 countries (Argentina, Colombia, Panama and Uruguay) has been a key factor to enhance online training, meaning an increase in the training hours particularly at the operational levels. Training has focused on operating excellence with the spotlight on the customer. The model is based on the mission and values of Codere and its purpose is to create a proposal of integrated and differentiating value to the customers permitting the Company to exceed their expectations maximizing the moments during which it is in contact with them.



Accident ratio⁸³

	2021			2022		
	Total	Men	Women	Total	Men	Women
Accidents	247	145	101	392	235	157
Frequency ratio⁸⁴	13.85	13.35	14.47	12.26	12.12	12.49
Seriousness ratio⁸⁵	0.20	0.25	0.13	0.17	0.18	0.17
Confirmed occupational diseases	1	0	1	4	1	3

⁸³ Codere Malta and Israel have been excluded from the computation of the accident ratio since they do not have an accident or absenteeism reporting system. However, the hours worked have been taken into account, obtained through an approximative calculation.

⁸⁴ The frequency ratio has been obtained by dividing the number of accidents with sick leave by the number of hours worked, multiplied by 1,000,000.

⁸⁵ The seriousness ratio has been calculated dividing the number of hours not worked due to sick leave for accidents by the number of hours worked, multiplied by 1,000.



Annex III Association and sponsorship actions

Main association and sponsorship actions in 2022⁸⁶

Type of cooperation	Name of the entity	Scope
Sports	Real Madrid C.F.	Latam
	Club de Fútbol de Monterrey (Rayados)	Global
	Club Atlético River Plate de Argentina	Global
	LaLiga	Spain
	Pibe Valderrama	Colombia
Institutional and regulatory	CEJUEGO (Consejo Empresarial del Juego)	Spain
	Jdigital (Asociación Española de Juego Digital)	
	COFAR (Confederación Española de Empresarios del Juego Recreativo en Hostelería)	Spain
	ANESAR (Asociación Española de empresarios de salones de juegos y recreativos)	Spain
	CEJ (Confederación Española de organización de organizaciones de empresarios del juego del bingo)	Spain
	Autocontrol (Asociación para la autorregulación de la comunicación comercial)	Spain
	CONFAD (Comisión nacional para combatir la manipulación de las competiciones deportivas y el fraude en las apuestas)	Spain
	ANMARE (Federación Andaluza de Asociaciones de Máquinas Recreativas, Salones y Ocio)	Spain
	APROCOMAR (Asociación Provincial Cordobesa de Máquinas Recreativas)	Spain
	EMOSA (Empresas Operadoras de Maquinas B de Sevilla Agrupadas)	Spain
	ERMA (Asociación de Empresarios del Recreativo de Málaga)	Spain
	AZEMAR Aragón (Asociación Empresarial de Máquinas Recreativas)	Spain
	AERPA (Asociación Empresarial del Recreativo del Principado de Asturias)	Spain
	ACOMAM (Asociación de Comerciantes Operadores de Máquinas Accionadas por Monedas de Baleares)	Spain
	ACEO (Asociación Cántabra de Empresas Operadoras)	Spain
	EUROPER	Spain
	ABUMAR (Asociación Burgalesa de Máquinas Recreativas)	Spain
	ASEOCL (Asociación de Empresas Operadoras de Castilla y León)	Spain
	FAMACASMAN (Federación de Asociaciones de Máquinas Recreativas de Castilla-La Mancha)	Spain
	AEMEXA (Asociación de Empresarios Extremeños del Automático)	Spain
	AMADER (Asociación Madrileña de Empresarios del Recreativo)	Spain
	ANDEMAR COMUNIDAD VALENCIANA (Asociación de Empresarios de Máquinas Recreativas de la Comunidad Valenciana)	Spain
	CONHOSTUR (Confederación Empresarial de Hostelería y turismo de la Comunidad Valenciana)	Spain
	APROMAR (Alicante)	Spain
	SGAE	Spain
	AEAM	Spain
	ASEJU (Asociación Empresarial de Juegos Autorizados)	Spain
	AGEDI (Asociación de Gestión de Derechos Intelectuales)	Spain
	SAJUCAL (Asociación de Empresarios de Salas de Juego de Castilla y León)	Spain
	AESCAM (Asociación de Empresarios de Establecimientos de Juego de Castilla-La Mancha)	Spain
	AEJE (Patronal de Juego del País Vasco)	Spain
	AGRUPACION OPERADORES DE MADRID, S.A.	Spain
	Sistema Gioco Italia/Confindustria SI	Italy
	ADM Agenzia Accise Dogane e Monopoli	Italy
	EGP Associazione italiana Esercenti Giochi Pubblici	Italy
	ALEA (Asociación de Loterías Estatales Argentina)	Argentina
	IPLyC (Instituto Provincial de Lotería y Casinos de la provincia de Buenos Aires)	Argentina
	LOTBA S.E. (Lotería de la Ciudad de Buenos Aires Sociedad del Estado)	Argentina
	CECRA (Cámara Española de Comercio de la República Argentina)	Argentina

⁸⁶ The table includes the associations with which Codere cooperates, mentioned throughout the Report, and the institutions with which each business unit cooperates.



Main association and sponsorship actions in 2022⁸⁶

Type of cooperation	Name of the entity	Scope
Institutional and regulatory	DGJS (Dirección General de Juegos y Sorteos)	Mexico
	APJSAC (Asociación de Permisionarios de Juegos y Sorteos, A.C.)	Mexico
	CNBV (Comisión Nacional Bancaria de Valores)	Mexico
	CONDUSEF (Comisión Nacional para la Protección y Defensa de los Usuarios de Servicios Financieros)	Mexico
	Coljuegos (Empresa Industrial y Comercial del Estado Administradora del Monopolio Rentístico de los Juegos de Suerte y Azar)	Colombia
	SUPER SALUD (Superintendencia de Salud)	Colombia
	UIAF (Unidad de Información y Análisis Financiero)	Colombia
	DIAN (Dirección de Impuestos y Aduanas Nacionales)	Colombia
	UGPP (Unidad de Gestión Pensional y Parafiscales)	Colombia
	ARL (Administradora de Riesgos Laborales)	Colombia
	UIF (Unidad de inteligencia financiera)	Colombia
	Dirección General de Casinos (Ministerio de Economía y Finanzas)	Uruguay
	Intendencia Municipal de Montevideo (Casino Carrasco)	Uruguay
	Red de Psicólogos de Uruguay	Uruguay
	IFHA (International Federation of Horseracing Authorities)	Uruguay and Panama
	Junta de Control de Juegos (JCJ)	Panama
	Comisión Nacional de Carreras (CNC)	Panama
	Instituto Nacional de Salud Mental (INSAM)	Panama
	Unidad de Análisis Financiero	Panama
	Superintendencia de Sujetos no Financieros	Panama
ASAJA (Asociación de Administradores de Juegos de Azar de Panamá)	Panama	
	USA	
Foudations and NGOs	Fundación Prodis	Spain
	Llamada Solidaria	Spain
	Fundación Kivo Jambo	Spain
	Stella Maris College	Spain
	Asociación Remar	Spain
	World Central Kitchen	Spain and Italy
	Mensajeros de la Paz	Spain and Italy
	Bea a Colori	Italy
	Telethon	Italy
	Io Domani	Italy
	Fundación Villa Gaia	Italy
	Cooperativa EVA	Italy
	Caritas de Latina	Italy
	Fundación Padres	Argentina
	Alma Mía	Argentina
	Club deportivo Morón	Argentina
	Fundación PUPI	Argentina
	Cáritas	Argentina
	Asociación de Jugadores Anónimos	Mexico
	She Wins	Mexico
	Sensoria	Mexico
	DIF (Desarrollo Integral de la Familia) de Huixquilucan de Degollado, Estado de México.	Mexico
	COMUNIDAR (Fundación para Unir y Dar, A.C.)	Mexico
	Colombia Chiquita	Colombia
	OSAF (Organización Sudamericana de Fomento del Sangre Pura de Carrera)	Uruguay and Panama
	Instituto Panameño de Rehabilitación Especial (IPHE)	Panama
	Cruz Blanca	Panama
	Club Kiwanis (Chiriquí)	Panama
	Iglesia Stella Maris	Uruguay
	Liceo nº13	Uruguay
Centros de atención a la infancia y la familia	Uruguay	
Centro comunal del municipio de Carrasco	Uruguay	



Annex IV Table of contents in relation to the requirements of applicable law

This report meets the requirements of applicable law, on non-financial reporting and diversity, as shown in the following table of content.

Content of the Non-Financial Information Statement	Related selected GRI content	Pages
Description of the group's business model		
Business environment	GR1 2: General disclosures 2021	2-1 Organizational details 2-6 Activities, value chain and other business relationships 2-22 Statement on sustainable development strategy 4; 6-19; 20-21
Organization and structure		
Markets in which it operates		
Objectives and strategies		
Main factors and trends that may affect its future evolution		
Description of the policies applied by the group in respect of those questions		
Due diligence processes applied for identification, assessment, prevention and mitigation of significant risks and impacts and for verification and control	GRI 3: Material topics 2021	3-3 Management of material topics 33-35; 117
Measures that have been adopted		
Results of these policies		
KPI of non-financial results permitting monitoring and assessment of progress favoring comparability between companies and sectors, in compliance with the national European or international reference frameworks used for each matter		7
Principales riesgos relacionados con esas cuestiones vinculados a las actividades del grupo		
Where relevant and proportionate, its commercial relations, products or services that may have negative impacts in those contexts and manner in which the group manages those risks, explaining the processes used to detect them and assess them in accordance with the reference national, European or international frameworks for each matter.	GRI 2: General disclosures 2021 GRI 205: Anti-corruption 2016 GRI 413: Local Communities 2016 407: Freedom of association and collective bargaining 2016 408: Child Labor 2016 409: Forced or Compulsory Labor 2016	2-25 Processes to remediate negative impacts 205-1 Operations assessed for risks related to corruption 413-1 Operations with local community engagement, impact assessments, and development programs 407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk 408-1 Operations and suppliers at significant risk for incidents of child labor 409-1: Operations and suppliers at risk for incidents of forced or compulsory labor 42-47
Information on detected impacts, offering a breakdown, in particular on the main risks in the short, mean and long term		



KPI of non-financial results relevant in respect of the particular business activity, meeting the policies of compatibility, materiality, relevance and reliability.	GRI 1: Foundation 2021	Provide a statement of use	7
I. Information on environmental matters			
In-depth information on the current effects of the company's activities on the environment and, as the case may be, on health and safety			98-103
Environmental certificate or assessment procedures			
Resources allocated to environmental risk prevention		3-3 Management of material topics	Codere's main action in the environmental context is related to the energy consumption reduction project in Spain for which an investment of 311,000 euros has been forecast. This project commenced in 2021 and will continue in 2022.
Application of the principle of precaution	GRI 3: Material topics 2021	201-2 Financial implications and other risks and opportunities due to climate change	Codere's operations do not have a serious impact on the environment, its main effects being energy and water consumption, and the generation of greenhouse gas emissions and certain types of waste. Codere performs several actions to mitigate these environmental impacts and thus cooperate with the achievement of the main national and international policies on the matter, including the Principle of Precaution established in the Rio Declaration on Environment.
Amount of the provisions and guarantees for environmental risks	GRI 201: Economic performance 2016	308-1 New suppliers that were screened using environmental criteria	
	GRI 308: Supplier environmental assessment 2016	308-2 Negative environmental impacts in the supply chain and actions taken	
Specifically:			
– Pollution:			
Measures to prevent, reduce or repair carbon emissions seriously affecting the environment, taking into account any form of specific air pollution of an activity	GRI 305: Emissions 2016	305-5 Reduction of GHG emissions 305-6 Emissions of ozone-depleting substances (ODS) 305-7 Nitrogen oxides (NOx), sulfur oxides (Sox) and other significant air emissions	98-103
Including noise and light pollution.	According to the prepared materiality report, this topic is not material for the company's business model.		
Total emissions of ozone-depleting substances (ODS), of nitrogen oxide (Nox), sulfur oxide (Sox) and other significant emissions to the air.	GRI 305: Emissions 2016	305-6 Emissions of ozone-depleting substances (ODS)	Emissions of ozone-depleting substances are not a material topic for Codere.
– Circular economy and waste prevention and management:			
Measures of prevention, recycling, reuse, and other forms of waste recovery and elimination.	GRI 301: Materials 2016 GRI 306: Effluents and Waste 2020	301-2 Materials used by weight or volume 301-3 Reclaimed products and their packaging materials 306-2 Management of significant impacts of waste	98-103 Codere does not currently have the necessary systems to calculate the volume of waste generated.
Actions to combat the waste of food.	According to the prepared materiality report, this topic is not material to the company's business model		



– Sustainable use of resources:			
Water consumption and supply according to the local limitations		303-1 Interactions with water as a shared resource	99
Consumption of raw materials and measures adopted to improve the efficiency of their use		303-2 Management of water discharge-related impacts	According to the prepared materiality report, this topic is not material to the company's business.
Direct and indirect consumption of energy		303-3 Water withdrawal	99
Measures adopted to improve energy efficiency and the use of renewable energies	GRI 301: Materials 2016 GRI 302: Energy 2016 GRI 303: Water and effluents 2018	301-1 Materials used by weight or volume 301-2 Recycled input materials used 302-1 Energy consumption within the organization 302-2 Energy consumption outside of the organization 302-3 Energy intensity 302-4 Reduction of energy consumption 302-5 Reductions in energy requirements of products and services	98-103
– Climate change:			
Relevant factors of the greenhouse gas emissions generated as a result of the company's activities, including the use of the goods and services that it produces.		305-1 Direct (Scope 1) GHG emissions	102
Measures adopted to adapt to the consequences of the climate change.		305-2 Energy indirect (Scope 2) GHG emissions 305-3 Other indirect (Scope 3) GHG emissions	Codere has not adopted any measures in this area.
Reduction goals established voluntarily in the mean and long terms to reduce greenhouse gas emissions and means implemented for the purpose.	GRI 201: Economic performance 2016 GRI 305: Emissions 2016	305-4 GHG emissions intensity 305-5 Reduction of GHG emissions 201-2 Financial implications and other risks and opportunities	Codere has not established GHG reduction goals.
– Protection of biodiversity:			
Measures adopted to preserve or restore biodiversity.		304-3 Habitats protected or restored	
Impacts of the activities or operations in protected areas.	GRI 304: Biodiversity 2016 GRI 306: Effluents and Waste 2016	306-5 Water bodies affected by spills of water and/or runoff 304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas 304-2 Significant impacts of activities, products and services on biodiversity	According to the prepared materiality report, this topic is not material to the company's business
II. Information on social matters and personnel			
– Employment:			
Total number and distribution of employees by gender, age, country and professional group.	GRI 2: Contenidos generales 2021	2-7 Employees	
Total number and distribution of types of employment contract.	GRI 405: Diversidad e igualdad de oportunidades 2016	405-1 Diversity of governance bodies and employees	
Annual average number of permanent contracts, temporary contracts, and of full-time and part-time contracts, by gender, age, and professional group.			
Number of dismissals by gender, age and professional group.	GRI 3: Temas materiales 2021	3-3 Approach to work organization management	72; 118-127
Average remuneration and its evolution with a breakdown by gender, age and professional group or equal value.	GRI 3: Temas materiales 2021	3-3 Approach to work organization management	
Pay gap.	GRI 405: Diversidad e igualdad de oportunidades 2016	405-2 Ratio of basic salary and remuneration of women to men	



Average remuneration of directors and executives, including variable remuneration, daily allowances, compensation, payment to long-term savings systems and any other item, with a breakdown by gender.	GRI 2: General Disclosures 2021	2-19 Remuneration policies 2-20 Process to determine remuneration 2-21 Annual compensation ratio	28; 126
Implementation of policies to disconnect from work.	GRI 3: Material Topics 2021	3-3 Approach to work organization management	76; 85-86
Employees with disabilities.	GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	76; 82
– Organization of the work:			
Organization of working time.	GRI 3: Material Topics 2021	3-3 Approach to work organization management	88-90
Number of hours of absenteeism.	GRI 403: Occupational Health and Safety 2018	403-2 Hazard identification, risk assessment, and incident investigation	86; 118; 128
Measures to balance work and family life and promote the co-responsible exercise of these rights by both parents.	GRI 3: Material Topics 2021	3-3 Approach to work organization management	72-74; 76; 82-86
– Health and safety:			
Occupational health and safety conditions.	GRI 3: Material Topics	3-3 Approach to health and safety management	93-96
Industrial accidents, in particular, their frequency and seriousness, by gender.	GRI 403: Occupational Health and Safety 2018	403-2 Hazard identification, risk assessment, and incident investigation	128
Occupational diseases, by gender.	GRI 403: Occupational Health and Safety 2018	403-3 Occupational health services	128
– Social relations:			
Organization of social dialogue, including procedures to inform, consult and negotiate with personnel.	GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	85-86
Percentage of employees covered by collective bargaining agreement, by country.	GRI 2: General Disclosures 2021	2-30 Collective bargaining agreements	127
Balance of the collective bargaining agreements, particularly in the field of occupational health and safety.	GRI 403: Occupational Health and Safety 2018	403-4 Worker participation, consultation, and communication on occupational health and safety	86
– Training:			
Policies implemented in the field of training.	GRI 3: Material Topics 2021	3-3 Approach to training and teaching management	90-92
Total hours of training, by professional group.	GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	127
– Universal accessibility of persons with disabilities.	GRI 3: Material Topics 2021	3-3 Approach to management of diversity and equal opportunity and non-discrimination	Codere's buildings meet the standards required in each country with the necessary adaptation of its halls for them to be accessible to persons with disabilities.



– Equality:			
Measures adopted to promote equal treatment and opportunities for women and men.	GRI 3: Material Topics 2021	3-3 Approach to management of diversity and equal opportunity and non-discrimination	77; 81-84; 90
Equality plans (Chapter III of Basic Law 3/2007, of March 22, for the effective equality of women and men)			84-85
Protocols against sexual and gender-based harassment			76-82
Measures adopted to promote employment, the integration and universal accessibility of persons with disabilities.			76-82
Policy against all forms of discrimination and, as the case may be, management of diversity.			81-82
III. Information on respect for human rights:			
Application of due diligence processes regarding human rights.	GRI 2: General Disclosures 2021 GRI 3: Material Topics 2021 GRI 410: Security Practices 2016	2-23 Policy commitments 2-26 Mechanisms for seeking advice and raising concerns 3-3 Approach to human rights management 410-1 Security personnel trained in human rights policies or procedures	30; 35
Prevention of the risks of violation of human rights and, as the case may be, measures to mitigate, manage and repair any potential abuses.			30; 35
Complaints for the violation of human rights.	406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	35
Promotion of and compliance with the essential covenants of the International Labor Organisation relating to respect for the right to free trade union membership and to collective bargaining; elimination of discrimination in employment and occupation; elimination of forced or compulsory labor; the effective abolition of child labor.	406: Non-discrimination 2016 GRI 407: Freedom of association and collective bargaining 2016 GRI 408: Child Labor 2016 GRI 409: Forced or Compulsory Labor 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk 406-1 Incidents of discrimination and corrective actions taken 409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor 408-1 Operations and suppliers at significant risk for incidents of child labor	29-35
IV. Information on the combat of corruption and bribery:			
Measures adopted to prevent corruption and bribery.	GRI 2: General Disclosures 2021 GRI 205: Anti-corruption 2016	2-23: Policy commitments 2-26 Mechanisms for seeking advice and raising concerns 205-1 Operations assessed for risks related to corruption 205-2 Communication and training about anti-corruption policies and procedures 205-3 Confirmed incidents of corruption and actions taken	31; 49; 62
Measures to combat money laundering.	GRI 205: Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	27; 31-34; 44
Contributions to foundations and NGOs.	GRI 3: Material Topics 2021	3-3 Approach to management of contribution to foundations and NGOs	65-71



V. Information on the company:			
– Commitments of the company to sustainable development:			
Impact of the company's activity on local development and employment	GRI 203: Indirect Economic Impacts 2016 GRI 413: Local Communities 2016	203-1 Infrastructure investments and services supported 203-2 Significant indirect economic impacts 413-1 Operations with local community engagement, impact assessments, and development programs	65-71
Impact of the company's activity on local towns and the territory.	GRI 203: Indirect Economic Impacts 2016 GRI 411: Rights of Indigenous Peoples 2016 GRI 413: Local Communities 2016	203-1 Infrastructure investments and services supported 203-2 Significant indirect economic impacts 411-1 Incidents of violations involving rights of indigenous peoples 413-1 Operations with local community engagement, impact assessments, and development programs 413-2 Operations with significant actual and potential negative impacts	According to the prepared materiality report, this topic is not material to the company's business.
Relations with the players of the local communities and forms of dialogue with them.	GRI 2: General Disclosures 2021 GRI 413: Local Communities 2016	2-29 Approach to stakeholder engagement 413-1 Operations with local community engagement, impact assessments, and development programs	104-109
Association of sponsorship actions.	GRI 2: General Disclosures	2-28 Membership associations	8; 129-130
– Subcontracting and suppliers:			
Inclusion in the purchasing policy of social. Gender-equality and environmental matters.	GRI 2: General Disclosures 2021 GRI 308: Supplier Environmental Assessment 2016 GRI 414: Supplier Social Assessment 2016	2-6 Activities, value chain and other business relationships 308-1 New suppliers that were screened using environmental criteria 414-1 New suppliers that were screened using social criteria	Codere's Purchases Policy does not yet include criteria of this kind, beyond the compliance with the minimum requirements established by law.
Consideration in relations with suppliers and subcontractors of their social and environmental responsibility.	GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria 414-2 Negative social impacts in the supply chain and actions taken	
Supervision systems and audits and their results.	GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria 414-2 Negative social impacts in the supply chain and actions taken	Codere carries out external audits on some of its suppliers. These audits are focused on financial, privacy and personal data protection matters.
– Consumers:			
Consumer health and safety measures.	GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	9-10
Claim systems, claims received and their resolution.	GRI 416: Customer Health and Safety 2016	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	33-35; 105-106



– Tax information:			
Profits obtained country by country.	GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	109
Taxes paid on profit.	GRI 207: Tax 2019	207-1 Approach to tax 207-2 Tax governance, control and risk management 207-4 Country-by-country reporting	107-109
Public aid received.	GRI 201: Economic Performance 2016	201-4 Financial assistance received from government	Codere has not received public aid in 2022 (or in 2020 or 2021)

