

GRI CONTENT INDEX

To the Sustainability Report of Szerencsejáték Zrt. - 2020
<https://rolunk.szerencsejatek.hu/hu/jelentesink>

GRI Code	Name of disclosure	Section	Place of disclosure	Direct response/Explanation of omission/Comment
GRI 102: General disclosures 2016				
Organisational Profile				
102-1	Name of the organisation	Summary	p. 7	
102-2	Activities, brands, products, and services	Summary	p. 9	
102-3	Location of headquarters			Imprint.
102-4	Scope of operations		p. 9, GRI Index	The country in which the Company operates is Hungary.
102-5	Nature of ownership and legal form	Organisational and operational frameworks	p. 7, p. 25	
102-6	Markets served		p. 9	https://rolunk.szerencsejatek.hu/hu/bemutkozunk
102-7	Scale of the organisation	Summary	p. 8-9	We consider the entire organisation to be a single operation.
102-8	Information on employees and other workers	Our employees	p. 59-61	The report is based on year-end closing headcount data. Of those employed, 102 have fixed-term contracts (15 male and 87 female employees). Of those employed, 474 have part-time employment (66 male and 408 female employees).
102-9	Supply chain	Responsible purchasing	p. 31	
102-10	Significant changes to the organisation and its supply chain		GRI index	There was no such change.
102-11	Precautionary Principle or approach		p. 75-77, GRI Index	https://rolunk.szerencsejatek.hu/hu/kornyezeti-felelosseg Szerencsejáték Zrt. takes the environmental precautionary principle into account in its business decisions.
102-12	External initiatives	Responsible gaming	p. 45-47, GRI Index	EL Responsible Gaming Standards, WLA Responsible Gaming Framework, Code of Advertising Ethics of the Self-regulating Board of Advertising (ÖRT)
102-13	Association memberships	Responsible gaming audit	p. 57	For more information, see page 109 of the 2019 report at tinyurl.com/szrt2019 .
Strategy				
102-14	Statement from senior decision-maker	Letter from the CEO	p. 11-15	
Ethics and Integrity				
102-16	Values, principles, standards, and norms of behaviour	Ethical operation, responsible gaming	p. 34, p. 49-50	Code of Ethics, https://rolunk.szerencsejatek.hu/hu/ertekeink
Governance				
102-18	Governance structure	Organisational and operational frameworks	p. 25	https://rolunk.szerencsejatek.hu/hu/szervezeti-felepitese-szemelyzeti-adatok
Stakeholder engagement				
102-40	List of stakeholder groups	Annexes	p. 79	
102-41	Collective Bargaining Agreement			In line with Hungarian laws, all employees fall under the scope of the agreement (98%) with the exception of senior officers.
102-42	Identifying and selecting stakeholders	Sustainability for Szerencsejáték Zrt., Annexes	p. 17-19, p. 79	
102-43	Report the organization's approach to stakeholder engagement.	Sustainability for Szerencsejáték Zrt., Annexes	p. 17-19, p. 79	Stakeholders are in constant contact.
102-44	Key topics and concerns raised	Sustainability for Szerencsejáték Zrt., Annexes	p. 17-19, p. 79	The topics are presented in the thematic sections of the report.
Reporting practice				
102-45	Entities included in the consolidated financial statements	Summary	p. 7-9	
102-46	Defining report content and topic boundaries	Sustainability for Szerencsejáték Zrt., Annexes	p. 17-19	
102-47	List of material topics	Sustainability for Szerencsejáték Zrt., Annexes	p. 17-19	
102-48	Restatements of information		GRI index	The report contains a re-disclosure of data for indicator 401-3.
102-49	Changes in reporting	Impacts of significant areas on the Company's stakeholders	p. 18	
102-50	Reporting period	Address	Address	1 January 2020 - 31 December 2020
102-51	Date of last report			Report for 2019.
102-52	Reporting cycle	Address	Address	The Company prepares an annual report.
102-53	Contact point for questions regarding the report	Imprint	p. 83	
102-54	Claims of reporting in accordance with the GRI Standards	Materiality	p. 18	
102-55	GRI Content Index		GRI index	
102-56	External certification		p. 80-81	
201 Economic performance 2016				
103-1	Explanation of the material topic and its boundaries	Summary, Sustainability for Szerencsejáték Zrt.	p. 7-9, p. 17-19	https://rolunk.szerencsejatek.hu/hu/bemutkozunk , https://rolunk.szerencsejatek.hu/hu/kuldetesunk
103-2	The management approach and its components	Financial results	p. 8	https://rolunk.szerencsejatek.hu/hu/bemutkozunk , https://rolunk.szerencsejatek.hu/hu/kuldetesunk
103-3	Evaluation of the management approach	Sustainability for Szerencsejáték Zrt.	p. 17-19	https://rolunk.szerencsejatek.hu/hu/bemutkozunk , https://rolunk.szerencsejatek.hu/hu/kuldetesunk , https://rolunk.szerencsejatek.hu/hu/gazdalkodasi-adatok
201-1	Direct economic value generated and distributed	Summary	p. 8	Information on operating costs, labour costs and operating profit is contained in the Business Report of Szerencsejáték Zrt. for 2020 (https://rolunk.szerencsejatek.hu/hu/a-szerencsejatek-zrt-2020-december-31-ei-eves-beszamolaja).

202 Market presence 2016					
103-1	Explanation of the material topic and its boundaries	Sustainability for Szerencsejáték Zrt.	p. 17-19		
103-2	The management approach and its components	Our employees	p. 59-65		
103-3	Evaluation of the management approach	Sustainability for Szerencsejáték Zrt., Our employees	p. 17-19, p. 59-65		
202-1	Ratios of standard entry level wage by gender compared to local minimum wage		GRI index		In terms of employees, there is no difference between women and men. We have no information on non-employed workers working on the Company's premises.
205 Anti-corruption 2016					
103-1	Explanation of the material topic and its boundaries	Sustainability for Szerencsejáték Zrt.	p. 17-19		
103-2	The management approach and its components	Legal compliance	p. 30, p. 39		
103-3	Evaluation of the management approach	Sustainability for Szerencsejáték Zrt., Legal compliance	p. 17-19, p. 30, p. 39		
205-2	Communication and training about anti-corruption policies and procedures	Compliance support (Compliance), Anti-corruption action	p. 26-27, p. 30		
206 Anti-competitive behaviour 2016					
103-1	Explanation of the material topic and its boundaries	Sustainability for Szerencsejáték Zrt.	p. 17-19		
103-2	The management approach and its components	Legal compliance	p. 30		
103-3	Evaluation of the management approach	Sustainability for Szerencsejáték Zrt., Legal compliance	p. 17-19, p. 30		
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices		GRI index		No official proceedings were opened against the Company in the past three years for violations of competition law or for anti-trust and anti-monopoly practices, and there are no such proceedings in progress.
300 Environmental 2016-2020					
103-1	Explanation of the material topic and its boundaries	Sustainability for Szerencsejáték Zrt., Environmental protection	p. 17-19, p. 75		
103-2	The management approach and its components	Environmental protection	p. 75-77		
103-3	Evaluation of the management approach	Sustainability for Szerencsejáték Zrt., Environmental protection	p. 17-19, p. 75-77		
305-1	Direct GHG emissions	Environmental protection	p. 75-77		CO2 calculation factor from natural gas: general literary data Factor used for CO2 emissions of motor vehicles: European Environment Agency, Average CO2 emissions of passenger cars 2019
305-2	Indirect GHG emissions	Environmental protection	p. 75-77		Indirect emission factor of district heating: Hungarian Energy and Public Utility Regulatory Authority Data on the Hungarian District Heating Sector 2019 (conservative value selected from the data) CO2 factor of indirect electricity emissions: aib-net.org Hungarian producer mix 2020 (location-based calculation)
305-3	Other indirect GHG emissions (business trips)	Environmental protection	p. 75-76		
306-1	Significant impacts related to waste generation and waste	Environmental protection	p. 77		
306-2	Management of significant impacts related to waste	Environmental protection	p. 77		The vast majority of the generated waste is municipal waste, the amount of which has been calculated on the basis of the public service in accordance with the waste transportation contract.
306-3	Amount of waste generated (data)	Environmental protection	p. 77		The vast majority of the generated waste is municipal waste, the amount of which has been calculated on the basis of the public service in accordance with the waste transportation contract.
303-3	Water usage	Environmental protection	p. 77		The data are reported in m ³ .
401 Employment 2016					
103-1	Explanation of the material topic and its boundaries	Sustainability for Szerencsejáték Zrt., Employee commitment	p. 17-19, p. 59		
103-2	The management approach and its components	Our employees	p. 59-65		
103-3	Evaluation of the management approach	Sustainability for Szerencsejáték Zrt., Our employees	p. 17-19, p. 59-65		
401-3	Parental leave	Our employees	p. 59-60		Number of MALE employees returning to work after parental leave (No. of persons) in 2019 correctly: 1 person (2 employees were included in the 2019 report).
403 Occupational health and safety 2018					
103-1	Explanation of the material topic and its boundaries	Sustainability for Szerencsejáték Zrt., Safe working conditions	p. 17-19, p. 32-33		
103-2	The management approach and its components	Our employees, Safe working conditions	p. 59-65, p. 32-33		
103-3	Evaluation of the management approach	Sustainability for Szerencsejáték Zrt., Safe working conditions, Our employees	p. 17-19, p. 32-33, p. 59-65		
403-1	Occupational health and safety management system		GRI index		Our Company has no certified management system in place.

403-2	Hazard identification, risk assessment, and incident investigation	Safe working conditions	p. 32-33	The Company identifies occupational health and safety risks in accordance with the law, with the involvement of an external expert. Reporting occupational health and safety hazards in accordance with local regulations, if necessary, to the HSE commissioner or HSE representative. Refusal to work and escalation of occupational health and safety issues are based on the Code of Ethics (https://rolunk.szerencsejatek.hu/uploads/files/original/statistic_page/20180809214617/etikai-kodex-2019.pdf , Report Misuse section).
403-3	Occupational health services	Safe working conditions	p. 32-33	Ensured as per legal requirements.
403-4	Worker participation, consultation, and communication on occupational health and safety	Safe working conditions	p. 32-33	Code of Ethics (https://rolunk.szerencsejatek.hu/uploads/files/original/statistic_page/20180809214617/etikai-kodex-2019.pdf), "The employees of the Company shall elect a HSE representative, whose task it is to ensure that the requirements for safe and secure work are complied with, and to perform the tasks prescribed for him by special law and internal regulations."
403-5	Worker training on occupational health and safety	Safe working conditions	p. 32-33	
403-6	Promotion of worker health	Safe working conditions	p. 32-33	
403-7	Prevention and mitigation of occupational health and safety impacts directly linked to business relationships	Safe working conditions, Gambler protection and prevention	p. 32-33, p. 54-55	
403-9	Work-related accidents	Safe working conditions	p. 32-33	
406 Non-discrimination 2016				
103-1	Explanation of the material topic and its boundaries	Sustainability for Szerencsejáték Zrt.	p. 17-19	
103-2	The management approach and its components	Our employees, Diversity and equal opportunity	p. 62-65, p. 67-70	
103-3	Evaluation of the management approach	Sustainability for Szerencsejáték Zrt., Diversity and equal opportunity	p. 17-19, p. 67-70	
406-1	Incidents of discrimination and corrective actions taken	Diversity and equal opportunity	p. 67-70	The focus of the Company's activities is on the involvement of disadvantaged employees. In addition, no cases of operational discrimination were identified in 2020.
416 Customer health and safety 2016				
103-1	Explanation of the material topic and its boundaries	Sustainability for Szerencsejáték Zrt.	p. 17-19	
103-2	The management approach and its components	Responsible gaming, Gambler protection and prevention	p. 49-50, p. 54-55	
103-3	Evaluation of the management approach	Sustainability for Szerencsejáték Zrt., Responsible gaming, Gambler protection and prevention	p. 17-19, p. 49-50, p. 54-55	
416-1	Assessment of the health and safety impacts of product and service categories		GRI index	100% (Gamgard)
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	Secure and healthy working, Responsible marketing and selling practices	p. 32-33, p. 49-50	There were no official proceedings opened against the Company and no voluntary commitments (EL-RGS, WLA Responsible Gaming Framework) were breached in the past three years.
417 Marketing and labelling 2016				
103-1	Explanation of the material topic and its boundaries	Sustainability for Szerencsejáték Zrt.	p. 17-19	
103-2	The management approach and its components	Responsible gaming, Responsible marketing and selling practices	p. 45-50	
103-3	Evaluation of the management approach	Sustainability for Szerencsejáték Zrt., Responsible gaming, Responsible marketing and selling practices	p. 17-19, p. 45-50	
417-1	Requirements for product and service information and labelling	Responsible marketing and selling practices	p. 49-50	Displaying signs warning of safe use (sign prohibiting the game for under-18s, Keep it a game!) is mandatory on all our products.
417-3	Incidents of non-compliance concerning marketing communications, including advertising, promotion and sponsorship, broken down by outcome.		GRI index	There were no official proceedings opened against the Company and no voluntary commitments (EL-RGS, Code of Ethics of the Self-regulating Board of Advertising (ÓRT)) were breached in the past three years.
418 Protection of personal data 2016				
103-1	Explanation of the material topic and its boundaries	Sustainability for Szerencsejáték Zrt.	p. 17-19	
103-2	The management approach and its components	Data protection and cyber security, cyber protection	p. 39-42	
103-3	Evaluation of the management approach	Sustainability for Szerencsejáték Zrt., Data protection and cyber security, cyber protection	p. 17-19, p. 39-42	
418-1	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.			There were no complaints in 2020, as in previous years, on the basis of which breach of customers' personal data or customers' privacy had been established.
419 Socioeconomic compliance 2016				
103-1	Explanation of the material topic and its boundaries	Sustainability for Szerencsejáték Zrt.	p. 17-19	
103-2	The management approach and its components	Legal compliance	p. 30	
103-3	Evaluation of the management approach	Sustainability for Szerencsejáték Zrt., Legal compliance	p. 17-19, p. 30	

419-1	Non-compliance with laws and regulations in the social and economic area	Legal compliance	p. 30	Page 53 of the Business Report for 2020 of Szerencsejáték Zrt. contains fines imposed on the Company, which did not include a significant amount. (https://rolunk.szerencsejatek.hu/hu/a-szerencsejatek-zrt-2020-december-31-ei-eves-beszamoloja)
Responsible sales (RS)				
103-1	Explanation of the material topic and its boundaries	Sustainability for Szerencsejáték Zrt.	p. 17-19	
103-2	The management approach and its components	Responsible purchasing, Responsible gaming	p. 31, p. 45-50	
103-3	Evaluation of the management approach	Sustainability for Szerencsejáték Zrt., Responsible purchasing, Responsible gaming	p. 17-19, p. 31, p. 45-50	
FE-1	Number of network audits	Responsible marketing and selling practices	p. 49-50	
Prevention of fraud/abuse (PFA)				
103-1	Explanation of the material topic and its boundaries	Sustainability for Szerencsejáték Zrt.	p. 17-19	
103-2	The management approach and its components	Legal compliance, Prevention of money laundering	p. 30, p. 35-39	
103-3	Evaluation of the management approach	Sustainability for Szerencsejáték Zrt., Legal compliance, Prevention of money laundering	p. 17-19, p. 31, p. 45-50	
CSM-1	Number of manual checks of online registration	Prevention of money laundering	p. 49-50	
Anti-money laundering (AML)				
103-1	Explanation of the material topic and its boundaries	Sustainability for Szerencsejáték Zrt.	p. 17-19	
103-2	The management approach and its components	Prevention of money laundering	p. 35-59	
103-3	Evaluation of the management approach	Sustainability for Szerencsejáték Zrt., Prevention of money laundering	p. 17-19, p. 35-39	
PM-1	Result of official targeted audits	Prevention of money laundering	p. 35-39	
Community sponsorship (CS)				
103-1	Explanation of the material topic and its boundaries	Sustainability for Szerencsejáték Zrt.	p. 17-19	
103-2	The management approach and its components	Charity and sponsorship	p. 73	
103-3	Evaluation of the management approach	Sustainability for Szerencsejáték Zrt., Charity and sponsorship	p. 17-19, p. 73	
KT-1	Amount of charity and sponsorship	Charity and sponsorship	p. 73	