

POLICY ON RESPONSIBLE GAMING OF OPAP

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[item 5.2(2)] BoD Resolution

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1. Definitions

“Individual Player Card (IPC)” shall mean the card issued by OPAP, which is necessary for the participation in Games of Chance, conducted via Gaming Machines.

“Electronic Player Account (EPA)” shall mean the unique account attributed to every player for his/her participation in one or more games, by the persons organizing and/or conducting such games. The said account shall at least record the entry amounts and the winnings generated from the games, the financial transactions relating to them, as well as the balance of a player’s available funds. Where mentioned in the present Policy, the Individual Player Card shall refer both to the Individual Player Card and to the Electronic Player Account as one unit, and vice versa.

“OPAP S.A.” or **“OPAP”** or the **“Company”** shall mean the Company OPAP.

“Policies” shall mean the guidelines and basic rules of the Company. More specifically, as regards the OPAP Agencies, they shall mean the guidelines and rules aiming at a) the adherence to the applicable legislation and the regulatory framework regarding the conduct of the games, b) the specialization of Agents’ obligations deriving from the present contractual relationship and the establishment of Agency operation procedures, c) the preservation and enhancement of the reputation and the establishment of the identity and uniformity of Agencies, d) the laying down of OPAP’s financial terms of cooperation.

“OPAP Agencies” or **“OPAP Agencies’ Network”** shall mean, within the context of the present Policy, type A, Type F, and Type B Agencies.

“OPAP games of chance” or **“games of chance”** or **“games”** shall mean the games offered by OPAP via its Agencies, including PLAY games of chance and online games of chance. The term “OPAP games of chance”, as used within the context of the present document, does not include games of chance provided by other companies of OPAP Group via OPAP Agencies and/or other points of sale.

“PLAY games of chance” shall mean the games of chance as those have been certified by the HGC, which are conducted via Video Lottery Terminal (VLT) gaming machines within the dedicated area of Type F and Type B Agencies.

“Agent” Responsible for the smooth operation of Type A or of Type F Agencies, pursuant to the provisions of the legislation, of the Regulation, and of the relevant decisions and instructions of the HGC.

“Operator” The natural person who is responsible for the smooth operation of Type F or of Type B Agencies, pursuant to the provisions of the legislation, of the Regulation, and of the relevant decisions and instructions of the HGC.

“Stakeholders” Stakeholders are defined as anyone who influences or is influenced by OPAP’s operations, throughout the value chain and across OPAP’s operations.

“Responsible Gaming” is considered to be the safe environment, in which consumers are provided with timely, accurate and sufficient information about the products, the terms and conditions of their use, as well as the risks and repercussions that the excessive participation in games of chance entails.

It is clarified that the information provided by OPAP neither advises nor encourages consumers to participate in the games of chance conducted by the Company. In any case, it is stressed that the participation in the games of chance constitutes a consumer’s personal choice, which is based on one’s need to satisfy their natural propensity for entertainment.

2. Scope and content of the present policy

The present Policy on “Responsible Gaming” of OPAP is addressed to all stakeholders that participate or are engaged in its activities, and constitutes a commitment pursuant to which the Company takes all necessary measures, by providing all necessary information concerning the games of chance, so as to minimize their potential negative impact.

The “Responsible Gaming” Policy sets the general principles for the responsible conduct of all games of chance provided by OPAP, either offline or online, under the scope of which fall the players, the OPAP personnel, and the OPAP Agencies’ Network.

It also sets forth the principles and the content of OPAP’s commitment, aiming at minimizing the potential negative consequences for society as a whole, caused by games of chance. It is applied in accordance with and complementary to the existing Greek, EU and International Legislation and the Regulatory Framework on games of chance and Responsible Gaming.

The present Policy is a tool that aims at defining the way that the principles of Responsible Gaming must be incorporated into the Company’s operations, as well as in the behavior of its employees and partners, and relates to all games of chance operated by OPAP, offline and/or via any other means and way of conduct.

Towards this end, the principles for the operational framework of the games of chance are established in order to ensure:

- The provision of timely and comprehensive information to the player regarding one’s participation in games of chance in order for him/her to make decisions, being fully aware of the rules of conduct of the games he/she selects to participate in. It is expressly clarified that the participation in games of chance constitutes the outcome of each player’s free and independent personal choice (unstimulated gambling).
- The provision of information regarding the established structures that provide assistance and support both to players who encounter problems caused by excessive participation in games of chance, and to their families.

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- The protection of minors by prohibiting their entry and stay at OPAP Agencies, and more specifically, by prohibiting their participation in games of chance provided by the Company.
- The protection of persons under the age of 21 and of self-excluded players by prohibiting their entry into the areas where PLAY games of chance are provided as well as by prohibiting their participation in the said games. The ongoing consultation held with organizations for the prevention and support of Players experiencing problems caused by their excessive participation in games of chance, with specialized therapists, researchers, employees, agents and similar companies involved in the games of chance industry, to further understand and monitor the phenomenon of problematic gaming behavior.

3. The objective and strategy of OPAP on Responsible Gaming

In 2018, OPAP was awarded the Level 4 Certification in Responsible Gaming by the **World Lotteries Association (WLA)**, as well as the Certificate of Alignment with the Standards on Responsible Gaming by the European Lotteries Association. The aforementioned bodies certified in the most official way possible that OPAP takes effective measures on Responsible Gaming, in accordance with standards and specifications established by the said bodies.

The long-standing objective of OPAP is to secure a responsibly established environment for all those who wish to participate in the games of chance provided by the Company in the context of entertainment.

The pursuit of this goal is secured through a framework of principles and values that define the Company's daily operation and practices. The main objective and corporate values of OPAP also clearly define its responsibility towards all social groups, to which its business activity is addressed. OPAP's **priority** is the **respect towards the consumer** on one hand, and the **protection of minors and other vulnerable social groups against the eventual harmful repercussions caused by the Company's activity** on the other hand. For this reason, the Company proceeds to setting the present Responsible Gaming Policy, by setting rules and by undertaking commitments towards the Players, its employees and partners, as well as towards the society in general, aiming at the responsible and effective implementation of the best possible practices during the conduct of the games of chance.

In order to achieve the objective of Responsible Gaming, OPAP has developed a Strategy for Responsible Gaming, which is structured on **three main pillars**:

- Players.
- OPAP Personnel
- OPAP Agencies' Network Agents, Venue Managers, Operators, and Agencies' personnel in general.

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In addition, OPAP implements a series of other actions to support its Responsible Gaming strategy, which include:

- The drafting of a special **OPAP Personnel Policy** on Responsible Gaming (Section 2.1 hereinafter).
- The drafting of a specific Policy on Responsible Gaming for Agents and the Agencies' personnel in general (Section 2.2 hereinafter).
- The adoption of specific rules exclusively applied to the Agencies providing PLAY games of chance.
- The integration of Responsible Gaming principles to all **advertising and commercial communication activities** and the drafting of a specific **OPAP Commercial Communication Policy on Responsible Gaming** (Section 2.3 hereinafter).
- The promotion of the active participation of all **stakeholders** in order to establish a continuously open dialogue and a partnership for actions to be taken in the context of Responsible Gaming.
- The continuous monitoring of problematic gaming behavior regarding games of chance.
- The integration of Responsible Gaming principles and features into the **games of chance design**.
- The **referral to support and treatment bodies** and the support of programs relating to problematic participation in games of chance.
- The integration of Responsible Gaming principles and features into PLAY and online games.
- The adoption of **reporting, measurement, and certification mechanisms** to ensure the implementation of Responsible Gaming principles.

4. Responsible Gaming and Players

The decision to participate in one or more games of chance constitutes a person's free and independent choice. OPAP commits to providing all necessary information relating to its games of chance, so that players can decide if and how they will play, by making their decision in accordance with both their personal choices and their individual background.

Players may find information on the games, the conduct rules, and the winning odds within the frame of each one of them, as well as information on where they can refer to for assistance in case they encounter problems related to the excessive participation in games of chance.

In this respect, the Company's strategy aims at protecting players through a series of actions:

- The provision of accurate and continuous information via:

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- the design and implementation of a Responsible Gaming awareness campaign on Mass Media and the OPAP Agencies' Network
 - the embedding of messages on Responsible Gaming on all coupons-playslips and other means used for the conduct of games of chance
 - the embedding of messages on Responsible Gaming on all playslips, coupons and other means used for the conduct of OPAP games of chance, and the provision of Company relevant informational material on the Responsible Gaming principles and the impact that excessive participation in games of chance may entail
 - the placement of labels on Responsible Gaming in Agencies and PLAY Stores, as well the provision of special Points of Information within the said areas
 - the OPAP partners' Network communication portal that provides any required information on the games of chance offered by OPAP.
 - the development of a Responsible Gaming corporate website (to include a dedicated section on Responsible Gaming) corporate.opap.gr/etairiki-upeuthinotita, which will include information on Responsible Gaming principles and rules, the helpline/ support program, a players' self-assessment questionnaire as well as other Responsible Gaming issues
- Measures to protect Players' private life and the confidential character of personal data, including the information related to their gaming activity
 - The implementation of a players' protection process via self-exclusion, implemented by OPAP and/or relatives (for online games and PLAY games)
 - The integration of gaming behavior control mechanisms to online and PLAY games
 - The provision of the option to Players to submit their complaints on Responsible Gaming via its Agencies' Network, its call center and/or the specific complaint form found on OPAP website The implementation of processes regarding the handling of complaints with regard to Responsible Gaming.
 - The development and implementation of an efficient referral mechanism to support and treatment bodies for Players experiencing problems caused by their excessive participation in games of chance

4.1. Research

OPAP aims at implementing a systematic approach for the conduct and recording of its customers' gaming behavior with regard to Responsible Gaming, as well as for the integration of the results to its operation in order to identify areas for improvement, related to the games of chance and processes.

In this context, OPAP promotes the research on the topics of excessive participation in games of chance, the protection of minors and of vulnerable social groups, in cooperation with independent

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research institutes and treatment providers. It monitors and analyzes relevant data, presents the relevant results to stakeholders and to the public, sponsors scientific conferences, and participates in the design of programs promoting the understanding of problematic gaming, as well as in the design of interventions for the prevention and treatment of problems related to excessive participation in games of chance.

4.1.1. Games Design, Online Games, and PLAY Games

OPAP ensures that the principles of Responsible Gaming are integrated into the games it offers and conducts.

In particular, the Company takes the following measures:

- Observance of games' design process, which complies with the European and International Responsible Gaming Standards, and describes:
 - The assessment of possible risk factors for every new or existing type of game, and
 - The implementation of effective strategies for the mitigation of the negative impact that may arise from all types of games
- The embedding of messages on Responsible Gaming on all playslips, coupons and other means used for the conduct of OPAP games of chance, and the provision of relevant Company informational material on Responsible Gaming principles and on the impact that the excessive participation in games of chance may have

With regard to online games and PLAY games, OPAP has those mechanisms in place that aim at protecting the interests of Players within the context of Responsible Gaming (age verification, setting time and spending limits, self-exclusion etc.), in compliance with all obligations deriving from the applicable regulatory and legislative framework, and ensures that all necessary information on the principles and rules on Responsible Gaming is included in the Company websites, in the websites offering online games of chance, as well on PLAY gaming machines' monitors.

4.1.2. Special Rules on Player Protection regarding online gaming

In compliance with the provisions of the Ministerial Decision 79835 EΞ 2020 (GG B 3265/05.08.2020) as applicable (the "Online Gaming Regulation"), a Player may - if they wish so - request that the Company has them temporarily or indefinitely excluded or request that they temporarily refrain from their participation in the conduct of online games. The Company ensures that the player does not participate in online games following their exclusion or refraining throughout their duration, as follows:

- The indefinite exclusion is set by the player. Where the Player requests his/her indefinite exclusion, OPAP shall immediately deactivate his/her Electronic Player Account, and terminate the contractual relationship. The Electronic Player Account can only be re-activated at the

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player's request, after the lapse of at least one (1) year as of their exclusion and only following the conclusion of an Accession Agreement.

- The temporary exclusion is set by the player for a period of at least one (1) month. OPAP shall forthwith block the Electronic Player Account ("blocked" status), pursuant to article 23 of the Online Gaming Regulation, and keep the aforementioned status throughout the temporary exclusion period.
- OPAP shall provide the Player with the possibility to temporarily refrain from participating in the Games for twenty-four (24) hours. Provided that the Player opts to temporarily refrain, OPAP shall forthwith block the Electronic Player Account, pursuant to article 23 of the Online Gaming Regulation, and keep its "blocked" status throughout the temporary refraining period.
- OPAP shall notify the excluded Player, as well as in the case of five (5) temporary refrainings on the option to receive consultation and support by a Hellenic rehabilitation center, and notify the HGC pursuant to the Authority Guidelines on information that relate to excluded persons, via the Safe Arrangement.
- OPAP shall ensure that a Player listed on the Excluded Persons' Record kept by the HGC cannot create an Electronic Account or participate in any way in online games organized and operated by OPAP for as long as they are included in the said registry
- OPAP shall ensure that the forwarding of commercial communication material to excluded players is prohibited. The said prohibition shall enter into effect following the lapse of twenty-four (24) hours as of the player's exclusion and for as long as the said exclusion is in force.

4.1.3. Referral to Treatment

As previously mentioned, OPAP commits to the protection of vulnerable social groups and players demonstrating excessive participation in games, and within this context, the Company sets the priority of the development and implementation of a comprehensive plan and method for the referral of players to support and treatment bodies for the handling of any problematic behaviors that may be associated with the excessive participation in games of chance.

In this respect, the Company supports the Therapy Center for Dependent Individuals (KETHEA-ALFA) for the operation of the **Helpline 1114**, which provides support and telecounseling to persons experiencing problems from excessive participation in games of chance, as well as to their relatives and/or friends. Information and support are also provided via email at 1114a@kethea-alfa.gr.

Thanks to this program, both players and their relatives/ friends receive support and guidance.

OPAP shall ensure that the information regarding the referral to support and treatment bodies is included in all corporate websites, the means used for the conduct of games of chance (e.g. playslips, coupons, program etc.), the informational material, as well as in advertising and communication

activities. Furthermore, OPAP shall ensure that its employees and all of its Agents are aware and able to provide relevant information to players, their relatives and friends, when required.

5. Responsible Gaming and OPAP Personnel

OPAP continuously commits to improving personnel awareness of Responsible Gaming principles. The Company shall ensure that Responsible Gaming principles are adopted by all of its employees and integrated to all relevant corporate processes and policies. To this end, the present OPAP Personnel Policy on Responsible Gaming has been developed.

5.1. Objective

The OPAP Personnel Policy on Responsible Gaming highlights the importance of full compliance with Responsible Gaming principles, while at the same time it informs the Company personnel on the rules and principles that must govern its general conduct.

5.2. Scope

The OPAP Personnel Policy on Responsible Gaming constitutes an integral part of the overall Responsible Gaming Policy, and is implemented by all OPAP personnel, who shall abide by and follow the principles and rules included herein, and shall aim at them being adhered to by all of their partners.

5.3. Rules and Principles

OPAP personnel is not allowed to participate in PLAY games and in games of chance operated online by the Company (via the internet).

OPAP Trading personnel in particular, who are responsible for the organization and conduct of fixed-odds betting games, is not allowed to participate in the aforementioned games of chance nor in the fixed-odds betting game (PAME STOIXIMA) conducted offline via the Agencies' Network.

5.4. Provision of Information

OPAP implements a comprehensive awareness campaign on Responsible Gaming, which includes informational material distributed to all personnel, as well as other relevant actions regarding Responsible Gaming. The main message of its awareness campaign communicates the core rules of Responsible Gaming:

- Play for Fun

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- Take frequent breaks
- Set a time and a spending limit
- You do not play if you are under 18 years old
- With regard to PLAY games and the games offered online (via the internet) in particular, you do not play if you are under 21 years old.

All OPAP employees are expected to be able to recognize the campaign's main message and the aforesaid Responsible Gaming core rules.

5.5. Training

OPAP implements a comprehensive training program on Responsible Gaming addressed to all of its employees. The said program also includes special training seminars, addressed to specific employee groups (such as Call Center and Sales Team employees). Reviewing of the training program is performed on an annual basis. Furthermore, OPAP makes sure that all newly-hired personnel is accordingly informed and trained.

OPAP People Team, with the support of the Responsible Gaming Team, is responsible for the design and implementation of the relevant training program on an annual basis, as well as for the assessment of the employees' awareness on Responsible Gaming, via relevant questionnaires and the annual Employee Survey.

OPAP shall endeavor to provide all means, including technological ones, for the proper execution and enhancement of the training program.

5.6. Training Objectives

The majority of employees working at OPAP offices does not have direct contact with Players-clients. Nonetheless, its training on Responsible Gaming is deemed necessary to ensure that those working at OPAP are aware of the strategy and the priorities of the Company in this field, as well as to promote the integration of the Responsible Gaming principles as an integral part of its new business initiatives.

OPAP provides training to its personnel on the principles and rules of Responsible Gaming, so that they are able to:

- understand the main principles and rules of Responsible Gaming.
- provide Players with information concerning the rules of Responsible Gaming, as well as with information on where to ask for support, in case they present a problematic behavior caused by the excessive participation in games of chance.
- provide OPAP Agents and other Company partners with the necessary information on Responsible Gaming.

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- comply with the prohibition of entry to minors, to those accompanying minors, to those who are under 21, and to self-excluded persons from PLAY games within the areas of conduct of OPAP games and with the prohibition of their participation in the said games, and to comply with the protection of vulnerable social groups.
- recognize signs of problematic behavior.
- handle cases of problematic behavior of Players, brought to their attention, with discretion and sensitivity possible, and take necessary measures for the elimination of such behavior.

The said training enhances OPAP's expectations and the comprehension of key actions associated with educating Players about issues that relate to Responsible Gaming. The said training aims at adding to the overall strategy of OPAP on Responsible Gaming, and provides the Company's personnel with the necessary knowledge, in order for it to be able to respond to eventual Players' requests regarding Responsible Gaming and the referral to support and treatment bodies.

5.7. Compliance with training requirements

The training on Responsible Gaming is mandatory for all OPAP personnel, while participation in training programs is supervised by OPAP People Team.

5.8. Reporting incidents

All employees are expected to report incidents of Players' problematic behavior or of minors' participation in the games provided by OPAP that may be brought to their attention. OPAP Legal, Regulatory and Compliance Team is responsible for receiving, recording and handling reports of such cases.

6. Responsible Gaming and OPAP Agencies

OPAP's Network of Agencies is the main touchpoint of Players with the conducted games of chance. Training and compliance of all those participating in the OPAP Network of Agencies with the regulatory framework and the Company rules on Responsible Gaming constitutes an essential part of OPAP's strategy.

OPAP ensures that all of its Agents, Venue Managers, Operators and employees working in the OPAP Network are aware of, adopt, and implement Responsible Gaming principles in their daily operations.

6.1. Objective

OPAP Agencies' Responsible Gaming Policy promotes all relevant rules and principles, which should govern the behavior and professional conduct of Agents, Venue Managers, Operators, as well as of all OPAP Network employees.

6.2. Scope

OPAP Agencies' Responsible Gaming Policy constitutes an integral part of the Company's overall Responsible Gaming strategy. Its scope includes all OPAP Agents, Venue Managers, Operators, and all OPAP Network employees, who are obliged to abide by and follow the principles and rules contained set forth by the Policy as well as to see to its proper implementation.

6.3. Rules and Principles

6.3.1. Basic Rules

OPAP Agents, Venue Managers, Operators, and OPAP Network employees:

- Provide players with information concerning the rules of Responsible Gaming
- Prohibit minors from entering and staying at the Agencies Prohibit persons under 21 and self-excluded players from accessing and staying at the installation and operation areas of PLAY games, within Type F and Type B Agencies.
- Prohibit adults from entering and staying at the Agencies, when they are accompanied by minors
- Prohibit minors from participating in games of chance
- Prohibit persons under 21 and self-excluded players from participating in PLAY games
- Prohibit persons who show signs of being under the influence of alcohol or of other addictive substances or show signs of drowsiness, and when it is generally evident that their overall condition cannot guarantee the conduct of Responsible Gaming from participating in games or from entering a store
- Do not pay winnings to minors
- Do not hand in OPAP games tickets and slips to minors
- Do not lend players money
- Do not accept alternative means of payment or of credit
- Provide a Point of Information including informational material on Responsible Gaming and on OPAP games of chance, as well as special signs supplied by OPAP
- Do not encourage excessive participation in games of chance

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- Do not underestimate the problem and react against signs of problematic gaming behavior
- Do not play on behalf of a player
- Persons involved in the operation of Type A and Type F Agencies are prohibited from participating in the games of chance offered online (via the internet)
- Persons owning or working in a Type F or Type B Agency are prohibited from participating in PLAY games in the said venues
- Verify the age of a player in case of doubt
- Handle eventual unacceptable player behavior with discretion and sensitivity, and take the necessary measures for the elimination of such behavior
- Do not issue an Individual Player Card (IPC) for persons who wish to participate in PLAY Games, but do not meet the specifications set forth by the competent Regulatory Authority
- Prohibit players from participating in games of chance via gaming machines, using IPCs belonging to third parties
- Encourage players to take breaks from their participation in games of chance
- Encourage players who show signs of compulsive participation in the games of chance to set themselves under a self-exclusion status
- Assist players, their relatives, and friends in handling problems relating to excessive participation in games of chance by referring them to the competent services of prevention and treatment.
- Encourage players to set limits as to the amount of time and money that they are willing to spend on gaming
- Report incidents of player unacceptable behavior related to Responsible Gaming to OPAP

6.3.2. Minors' protection against the participation in games of chance

The entry and stay of minors at OPAP's Network, as well as their participation in OPAP games **is prohibited**. Especially with regard to Agencies offering PLAY games of chance, it is strictly prohibited to persons under the age of 21 as well as to self-excluded persons to enter into and participate in PLAY games. It is clarified that with regard to Type F Agencies, the said prohibition applies to the aforementioned people accessing the dedicated PLAY games installation and operation area, as well as to them participating in PLAY games. OPAP Agents, Venue Managers, Operators and all OPAP Network employees are obliged to ensure full compliance with the said prohibition.

Labels/ signs supplied by OPAP prohibiting minors from entering the Agency and participating in games of chance must be visibly and distinctly placed both at the entrance and within Type A and Type F Agencies at all times. Type B Agencies must visibly and distinctly hold labels/ signs supplied by OPAP with regard to the prohibition of entry and of participation of persons under 21 and of self-

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excluded persons in PLAY games. Furthermore, the dedicated area found within Type F Agencies, where PLAY gaming machines are installed, must accommodate a corresponding special prohibition sign. It should be stressed that the said special sign must be placed both on the outside and on the inside of Agencies. All employees of the OPAP Network shall fully comply with this prohibition and follow the process of clients' age verification, when in doubt.

6.3.3. Age verification – process

When OPAP Agents or their OPAP Agencies' Network employees are not certain of a person's age, they are obliged **to request the said person to present his/her Police identity card (ID card) or passport upon their entry into the Agency.**

Subsequently, and in any of the following cases, namely: a) the potential player does not carry an ID card or a passport, b) the player has been self-excluded, c) the player is under the age of 18 or 21 respectively, d) the player cannot have an Individual Player's Card issued, since he/she does not meet the relevant conditions, e) the player owns another IPC, f) the player is included in an exclusion list, g) the player shows signs of being under the influence of alcohol or of other addictive substances or shows signs of drowsiness and generally, when it is obvious that his/her overall condition cannot guarantee the conduct of Responsible Gaming, then the OPAP Agents, Venue Managers, Operators and OPAP Agencies Network **shall**:

- Expressly prohibit minors from entering and staying within the Agency as well as from participating in OPAP games of chance.
- Expressly prohibit excluded players and persons who are under the age of 21 from entering, staying within, and participating in the dedicated PLAY games installation and operation area, located in Type F and Type B Agencies.
- Forthwith inform OPAP with regard to the said incident.

In case of foreign young nationals, they shall be requested to present an equivalent valid identification document issued by a public authority, such as a residence permit, a passport, a special ID card for aliens of Greek descent, an alien's identification card proving their date of birth.

In addition, the Agents, Venue Managers and Type A and Type F Agencies employees are prohibited from paying winnings to minors and from processing their tickets and games playslips.

6.3.4. Recognizing Players' problematic behavior

OPAP Agents and OPAP Agencies employees shall be aware that the following signs may be indicative of a player's problematic behavior:

- The participation in the games of chance becomes the most important and interesting thing in his/her life.

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- The amount of time and money spent on games of chance is escalating.
- Does not know when to stop playing.
- Unsuccessfully tries to stop playing or reduce his/her playing frequency.
- Becomes irritable when trying to stop or reduce playing.
- Lies about how much he/she plays.
- Steals or commits other illegal actions in order to play games of chance.
- Risks his/her relationships, job, family life or a good opportunity for the sake of playing games of chance.
- Spends more money on games of chance than he/she can actually afford.
- Feels guilty when playing.
- Persons close to him/her complain about his/her participation in games of chance.
- Borrows money to play.

6.3.5. Support and referral to support and treatment bodies

All OPAP Agents, Venue Managers, Operators and all OPAP Agencies Network employees shall be able to provide assistance to players presenting a problematic playing behavior.

Within this framework, Agents shall communicate to players demonstrating a problematic behavior that:

- Money that was intended to be spent on other purposes should not be spent on games of chance.
- When losing, they should not continue playing with the expectation that they are going to come even.
- They should not think of gaming as a solution to everyday problems.
- They should not borrow money to play.
- They should not consider the money they spent on gaming as a form of investment.
- They should not lie to their relatives and friends about the time and money spent on gaming.
- They should take breaks from their participation in games of chance, so that they are conscious of the duration of their participation.
- They should ask for help if they feel that their participation in the games of chance is no longer a form of entertainment to them.

Additionally, it is important that all Agents provide useful information to players, as well as to their relatives or friends, by referring them to the competent bodies for counseling and treatment.

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It is important that the Agents advise Players showing signs of a problematic behavior, as well as their relatives and friends **to call 1114, the helpline of KETHEA-ALFA for the handling of problems related to excessive participation in games of chance**, which was set up and operates with the support of OPAP.

6.3.6. Training of OPAP Agencies' Network

OPAP implements an integrated Responsible Gaming training program, which is reviewed on an annual basis. Participation of OPAP Agents, Venue Managers, Operators and all OPAP Agencies Network employees is mandatory for all training programs on Responsible Gaming, and attendance is supervised by OPAP's Retail Operations Division. Trainings are delivered:

- At OPAP training centers, located in Athens and Thessaloniki.
- Locally, at a prefecture or at a regional level, in a city or venue meeting the implementation conditions of each training.
- Via the internet using an electronic training platform (e-learning), if the training topic allows for it, aiming at providing direct access to knowledge both to Agents and the Agency's personnel, while at work or at home.
- Within the Agency premises, during working hours (on the job training).

6.3.6.1. Training objectives

It is a core priority for OPAP to provide training on Responsible Gaming rules and principles to all its OPAP Agencies' Network, thus complementing its strategy, given that the Agencies are the main touchpoint with clients. At the same time, the said training promotes knowledge with regard to the Company priorities on Responsible Gaming and the integration of Responsible Gaming principles in its daily business operation.

OPAP trains its Agents, Venue Managers, Operators and OPAP Agencies Network employees so that they are capable of implementing the Basic Rules of Responsible Gaming in their Agencies.

6.3.6.2. OPAP Agencies' employees

Agents, Venue managers, and Operators are obliged to provide all agency employees with appropriate training and detailed information regarding the principles, rules, and HGC decisions governing Responsible Gaming.

More specifically, they are obliged to ensure that all employees comply with the rules of Responsible Gaming, as well as that they are properly trained to inform players on the Responsible Gaming principles. Agents shall be responsible for any actions or omissions of their employees that violate their regulatory and contractual obligations, including the provisions of the present Policy.

6.3.7. Raising awareness and providing information

OPAP implements a comprehensive Responsible Gaming awareness campaign, which includes informational material regarding Responsible Gaming distributed to all Agencies, as well as other relevant actions (e.g. Responsible Gaming messages sent to OPAP Agents' terminals, display on the Agency screens). The main message of its awareness campaign communicates the core rules of Responsible Gaming:

- Play for Fun
- Take frequent breaks
- Set a time and a spending limit
- You do not play if you are under the age of 18
- With regard to PLAY games and the games offered online (via the internet) in particular, you do not play if you are under the age of 21.

All OPAP Agents, Venue Managers, Operators, and OPAP Agencies Network employees are expected to be able to recognize the campaign's main message and the aforementioned Responsible Gaming core rules.

6.3.8. Reporting incidents

OPAP Agents and OPAP Agencies employees shall report incidents related to Responsible Gaming to OPAP, following a procedure posted on allwynnet and allwynnetplay respectively, the official communication hub between the Company and its partners. Legal, Regulatory and Compliance Team is responsible to receive, register and handle reports of such incidents.

6.3.9. Contractual obligation

Pursuant to the contractual agreements governing the relationship between OPAP and OPAP Agencies Network partners, the Policies issued by the Company shall be binding to the Agent and constitute an integral part of their Agreement. The Agent, Venue Manager, Operator and their personnel shall comply with the applicable Commercial Policy and other OPAP Policies, including the Policy on Responsible Gaming.

6.3.10. Monitoring compliance with Responsible Gaming rules

Both OPAP and the Hellenic Gaming Commission (HGC) retain their right to monitor the Agents' compliance with Responsible Gaming rules and principles, and in this respect, they conduct relevant inspections at the Agencies.

Monitoring Agents' compliance with Responsible Gaming rules is implemented via any available means, inter alia via the method known as "Mystery Shopping" (secret inspections) and/or the conduct of inspections using Inspectors who present a special OPAP ID card.

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6.3.11. Penalties

Non-compliance of Agents, Venue Managers, Operators and Agency employees with the basic rules of Responsible Gaming entails the imposition of penalties pursuant to the procedure, and in case of repeated non-compliance, it may even constitute significant grounds for terminating the Agreement concluded between OPAP and the Agent.

6.3.12. Responsible Gaming for Agencies where PLAY games of chance are conducted - Specific Rules

6.3.12.1. Agent's obligations

Players shall be solely responsible for selecting the game, the amount of their spending, and the eventual re-betting of their winnings. Nonetheless, the Agent, the Operator, and the Agency personnel shall undertake the obligation towards OPAP to provide players with all necessary information regarding their participation in the games, the operation of PLAY gaming machines, the winnings payment method, and the submission of relevant complaints.

Indicatively, they shall provide information to players regarding their participation in the games, so that they make their decisions while being fully aware of the conduct rules of the games, which they select to participate in, weighing their decisions in relation to their personal choices and financial status. They shall also provide information regarding existing facilities providing assistance and support to players who experience problems due to the excessive participation in games of chance, as well as to their families.

6.3.12.2. Regulatory Framework

The Legislation along with the Regulation (B 3263/05.08.2020) governing the installation and operation of PLAY gaming machines provide for a series of regulations that describe in detail the Policy and the procedures applied by the Company in order to protect the players.

Within this context, OPAP ensures:

- The provision of PLAY gaming machines certified by the competent Regulatory Authority to the Agencies conducting PLAY games of chance.
- the certification of all Stores within which PLAY gaming machines are installed and belong to the OPAP Network. In particular, all Agencies accommodating PLAY gaming machines shall mandatorily display the lawful operation Certification sign mentioning the code number and the Agency Certification type in a prominent position at the Agency entrance.
- The issuance of an Individual Player Card (IPC) OPAP issues an Individual Player Card in all Certified Type B and Type F Agencies, only upon a player's request. It is prohibited to issue an Individual Player Card for persons under the age of twenty one (21) as well as for self-excluded players, and for those who are included in the exclusion list, whereas it should be noted that each player is only allowed to one Individual Player Card. The application for the issuance of an

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Individual Player Card must be accompanied by a copy of a valid ID or Passport. The Individual Player Card is mandatory to participate in the games, and helps the player keep track of the spending amounts spent and frequency in order to be able to set “self-restriction” limits.

- The integration of gaming behavior control mechanisms into PLAY games: Limits in relation to the participation duration and losses, Responsible Gaming and alert messages to the player concerning limits exceeding. In particular, when the player exceeds 80% of the loss limit, a message is displayed on the PLAY gaming machine monitor.
- The option of “Self-exclusion”, of relatives of 1st degree asking to have a player excluded and/or of other additional constraints on the participation in PLAY games, such as indicatively the option to terminate the gaming session and to exclude oneself from participating in the games until 00:00:00 (day stop).
- The provision of information via the helpline (1114 KETHEA-ALFA) for persons and their families who are in need of support on issues of excessive participation in games of chance.
- The provision of informational material on the games and clear instructions on the rules governing the conduct of games of chance, as well as information with regard to the odds of winning of every game of chance. The provision of a Game Guide for every Certified game of chance conducted via the PLAY gaming machines and its availability in digital and/or print form in Agencies conducting PLAY games of chance should be ensured. Game Guides should be accessible to players and thus placed in prominent places within the aforementioned agencies.
- The provision of informational material on Responsible Gaming, describing the support helplines (KETHEEA ALFA), the self-exclusion process, the restrictions a player may set to their gaming behavior etc.
- The immediate cancellation of the Individual Player Card, in cases where:
 - The Player submits a relevant request
 - The Regulatory Authority or OPAP decides to exclude the player

OPAP expects that its partners fully comply with the regulatory framework and the excellent operating standards of the Company.

6.3.13. Individual Player Card (IPC):

6.3.13.1. Terms and conditions of Issuance

The Individual Player Card (IPC) shall be issued solely in the name of a natural person who is older than twenty one (21), and provided that he/she acts on his/her own behalf. The IPC shall not be issued when:

- OPAP has repeatedly submitted reports to the AML/CTF Authority regarding the applicant, as per the data that is kept by OPAP

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- the HGC has prohibited the issuance of an Individual Player Card in the name of a particular person
- the applicant's name is included in a list of enforcement, administrative or judicial authority, or in a list compiled by an international body, due to his/her implication in illegal activities
- the applicant has previously requested OPAP to be excluded from participating in the conduct of games via gaming machines (self-exclusion request)
- the applicant already holds another Individual Player Card
- upon the submission of an IPC issuance application, the applicant presents antisocial behavior (e.g. signs of drug or alcohol use, violence) that does not guarantee his/her free will or is indicative of defect of will upon the conclusion of the Agreement, and the conduct of Responsible Gaming.

For every Player only one IPC shall be issued.

In accordance with the legislative and regulatory framework, the player shall be the only person using the IPC. Transferring an IPC in any way or handing over thereof to a third person or the use thereof by a third person upon a player's authorization, as well as the communication of the player's Personal Identification Number (PIN) to a third person are prohibited.

6.3.13.2. Process of IPC Issuance

The Individual Player Card is issued by OPAP by concurrently attaching the Accession Agreement, following a relevant application (Registration Application) submitted to any Agency conducting PLAY games of chance, as well as to points authorized by OPAP that employ properly trained personnel and own the infrastructure that enables communication with the CIS.

The application shall be accompanied by a copy of a valid identity card or passport. OPAP has the right - on a case-by-case- basis - to request the submission of additional documents regarding the cross-checking of the applicant's details, whereas the player shall provide any kind of assistance necessary regarding his/her identification process.

The application serves as a solemn declaration towards OPAP and the HGC as to the accuracy and veracity of the details therein declared, and as to the non-inclusion of the applicant in the categories of persons for which no IPC may be issued in accordance with the present terms.

In case the application is accepted, the IPC is immediately issued and delivered to the player in person by the Agency personnel.

In case the application is rejected due to the non-fulfillment of the terms and conditions governing the issuance of an IPC, the Agency personnel shall state the rejection as well as the reason for the said rejection in the relevant application field. If the applicant wishes to receive more information, he/she may address OPAP in writing. The applicant has the option to submit his/her objections to OPAP in writing.

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6.3.13.3. Exclusion of Player – Gaming Participation Restrictions

A player may, by his/her own volition, be excluded from participating in the conduct of Games (self-exclusion). Self-exclusion is carried out following a self-exclusion request, either prior to the issuance of the IPC or following its issuance, which results in the player being excluded from participating in the games.

A self-exclusion request prior to the issuance of an IPC shall only be accepted for an indefinite time period through a written application submitted to any Agency (following personal details verification) conducting PLAY games of chance or to OPAP Group HQs.

All players have the right to submit a self-exclusion request following an IPC issuance, in accordance with to the process set forth by the Company that has been posted on the Company official communication hub, namely Allwynnet / Allwynnetplay regarding the following cases:

- Self-exclusion for an indefinite period of time, which leads to termination of the contractual relationship.
- Self-exclusion for a particular time period, at least for 1 month, without being able to lift the exclusion.

In this case, the player may activate the self-exclusion option either by calling the OPAP Call Center that will immediately activate the player's self-exclusion upon his/her personal details' verification or by filling out the relevant self-exclusion form in an Agency, which the Agents, Operators, and Agency employees shall immediately forward to OPAP in accordance with the applicable process..

In the case of self-exclusion for an indefinite period of time, followed by a simultaneous termination of the contractual relationship, the re-activation of the EPA prior to the lapse of the time period as of the self-exclusion request submission, as set by the competent Regulatory Authority (HGC) in the Regulation (1 year) is not possible. The activation of an Electronic Player's Account is performed upon simultaneous conclusion of the Accession Agreement following a relevant request (Account Re-activation Application).

In the case of temporary self-exclusion, lifting of the exclusion is not provided for and the EPA remains deactivated throughout the temporary self-exclusion period.

In the frame of the principles of Responsible Gaming and in order for OPAP to protect its players, it also proceeds to the exclusion of players upon request of his/her spouse or 1st degree relative, in accordance with the applicable process.

7. OPAP Commercial Policy on Responsible Gaming

Pursuant to decision no. 79292 ΕΞ 2020 issued by the Minister of Finance “Enactment of Regulation regarding the Commercial Communication of Games of Chance” as applicable, Commercial Communication in the area of the provision of the games of chance services shall be implemented within a strict context, ensuring consumers’ and players’ protection.

Commercial Communication shall mean any advertising, promotion, and communication activity, direct or indirect, regarding games of chance, within and out of the agencies of the OPAP network, including all mass media such as TV, radio, internet, Social Media, ads in printed material or outdoor advertising, personalized communication, i.e. sms or other means of modern technology, exclusively conducted, and only if an express relevant consent has been previously provided by the players.

Commercial Communication must be reasonable and strictly limited to actions that are required so that consumers are directed to games operated by License Holders, thus promoting the principles of Responsible Gaming in an accurate manner. OPAP ensures that Responsible Gaming principles are integrated in all its communication and advertising activities. Any Commercial Communication plan is drafted in compliance with the principles of Responsible Gaming.

7.1. Objective

The objective of OPAP’s Commercial Communication Policy on Responsible Gaming is to provide guidance to both OPAP employees and to its external partners involved in any direct or indirect way in commercial communication actions for games of chance, in compliance with the principles and the rules of Responsible Gaming.

7.2. Scope

OPAP Commercial Policy on Responsible Gaming constitutes an integral part of the overall Responsible Gaming Policy. It is implemented in all commercial communication, promotion and advertising actions realized both by the Company employees and by its external partners, who are obliged to fully comply with the principles and the guidelines included in the present Policy, including the OPAP Commercial Communication Policy.

Agents and employees of OPAP agencies network shall strictly comply with the content of the present Policy and shall see to the exclusive use of the approved communication material on Responsible Gaming, in accordance with the recommendations/ instructions/ announcements of OPAP, as per the specific provisions below under 2.3.2 of the present Policy. All commercial communication material expressly mention the participation age limit regarding the games of chance, the addiction and loss of property risks eventually entailed in the excessive involvement in the games of chance, as well as the helpline 1114, designed and implemented by OPAP in cooperation with KETHEA for the psychological support of players and of their relatives.

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7.3. Rules and Principles

Commercial Communication of Games of Chance is governed by the following basic principles:

- The participation in the Games of Chance shall be the result of the free and independent personal will, and it shall not be a result of deceit, challenge or incitement.
- Commercial Communication shall be implemented within a strict frame of protection for consumers and players in the area of the provision of services. Furthermore, commercial communication must be reasonable and strictly limited to all actions required so that consumers are directed towards the Games of Chance conducted by License Holders, thus promoting Responsible Gaming in a clear manner.
- OPAP sees to not depict the Games as trivial or to promote a positive image of the Games when designing any Commercial Communication action, with regard to the fact that part of the revenues from their conduct may be intended or spent on charitable activities.
- To this end, OPAP drafts Commercial Communication plans, in accordance with the provisions of the Gaming Regulation on the Games of Chance Commercial Communication, which are submitted to the competent Regulatory Authorities for approval, and more specifically: the Commercial Communication plans, which are prepared by OPAP are submitted for approval both to the 3-member Audit Committee of OPAP of article 28, par. 3A of L. 4002/2011, as applicable in the context of the preventive supervision performance, and following their approval they are submitted to the Hellenic Gaming Commission, pursuant to the provisions of article 9 of the Regulation. The actions, which are implemented via each approved Commercial Communication plan as per the aforementioned, are always realized in strict compliance with the principles of Responsible Gaming, as well as in the context of the relevant decisions/ instructions of the Hellenic Gaming Commission. No commercial communication action shall be communicated unless previously approved by the competent Regulatory Authorities.
- All commercial announcements either addressing the personnel or the partners of OPAP or the wider audience via radio, TV and internet media, as well as via ads in print media or outdoor ads shall always comply with the provisions of the regulatory and legal framework in force, as well as of the Regulation, both during the design and production, and the implementation of the said actions.
- Commercial announcements via TV broadcasts shall comply with the provisions of PD 109/2010 (A 190). Commercial announcements via radio and TV media shall be displayed on airtime that complies with the relevant provisions. No covert advertisements shall be executed. All Commercial Announcements shall be directly acknowledged as an announcement of commercial

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promotion, of OPAP games of chance services advertisement, regardless of their form and medium used for their display.

- OPAP shall ensure that:
 - The aforementioned rules and principles are strictly observed by all agents and employees in OPAP agencies Network, by OPAP employees, as well as by its external partners/ suppliers (including advertising agencies) in the sector of Commercial Communication by using all suitable means (indicatively: announcement/ instructions, conduct of training seminars etc.).
 - Commercial Communication shall fully comply with the regulatory and legal framework in force.

8. Participation of Stakeholders

OPAP attributes great importance in the development of strong working relationships with key stakeholders (stakeholder engagement), aiming at exchanging information and improving all pillars of the Responsible Gaming strategy. In this context, OPAP:

- promotes the continuous participation of stakeholders and the mobilization of the academic and medical community, of Universities, Media and NGOs via one-to-one meetings and strategic partnerships and collaborations, sponsorships etc.
- explores opportunities to give speeches at conferences and events relating to games of chance.
- assists treatment providers regarding the support of players encountering problems due to excessive participation in games of chance.
- cooperates with independent academic institutions for the conduct of research on gaming issues.
- promotes the dialogue and cooperation with regulatory authorities and international organizations.
- supports the continuous sharing of knowledge, the dialogue and communication with all stakeholders, taking into account their views.

9. Report, Measurement and Certification

OPAP monitors and gathers data relating to all aspects of Responsible Gaming, as well as data regarding the efficiency and effectiveness of its Responsible Gaming actions. The relevant monitoring mechanisms and performance indicators are reviewed constantly in order to be aligned with the Company's Responsible Gaming strategy and commitments. Data is analyzed and assessed based on transparent procedures, whereas relevant information is provided to all stakeholders through the Company's Annual Results Report and the Annual

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OPAP Integrated Report, as well as through other reporting mechanisms. To enhance its accountability in terms of Responsible Gaming, the Company focuses on the certification provided by international organizations.

10. Annual Review of the Policy on Responsible Gaming

The present Responsible Gaming Policy is subject to annual review and revision (as well as to ad hoc revision, per case, in time periods that are less than a year, if this is imposed by the provisions of the applicable legislation or the circumstances), in order to ensure that it is fully compliant with the provisions of the Greek and EU legislation on the games of chance, as well as with the Responsible Gaming framework and principles set forth by the World Lottery Association and by European Lotteries.