

INTEGRATED
ANNUAL REPORT



20

**Leading a world
of entertainment**

19

Leading a world of entertainment

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**“2019
was
another
successful
year”**

Kamil Ziegler
Executive Chairman

Message from the Chairman

Dear shareholders and stakeholders,

I am pleased to present to you OPAP's Integrated Report for 2019, which provides a detailed overview of the company's results and progress at a business, operational and sustainability level. The Integrated Report covers all issues of material importance to OPAP, reflecting our focus on the values of accountability, transparency and responsibility.

Overall, 2019 was another successful year for OPAP. Gross Gaming Revenue (GGR) reached approximately 1.620 billion euros, up 4.7% year-on-year. EBITDA increased 16.7% to 412.6 million euros, and net profit rose 41.2%, amounting to 202.4 million euros. In line with our commitment to distribute the bulk of free cash flow to shareholders, OPAP distributed an extraordinary dividend of 1 euro per share, on 10 February 2020. The Board of Directors also proposed to the Annual General Meeting the distribution of 0.30 euro per share as ordinary dividend.

In 2019, we continued implementing investments with a positive effect on our annual performance. The conclusion of the VLTs network roll-out, which was launched in 2017, was definitely a highlight, involving significant investments by OPAP and its partners, creating thousands of jobs and tackling illegal gambling in Greece. Moreover, we enhanced our ongoing corporate responsibility programs in the areas of Health, Sport and Employment, which focus on building a better future for the younger generation.

Turning to 2020 now, the COVID-19 pandemic brought challenges, activity disruption and sizeable revenue losses, as our stores' network was forced to suspend operations. Thus, our focus turned to protecting OPAP's financial and liquidity position. Our healthy balance sheet and strong cash balance are important tools for limiting the crisis's effects and putting OPAP back on track, as the economy gradually recovers.

Moreover, we extended our social contribution to support the efforts of healthcare authorities in Greece and Cyprus. Among other things, we delivered 500,000 surgical masks and medical equipment to three Greek public hospitals tasked with tackling the pandemic. Additionally, we took initiatives for our OPAP and PLAY store partners, aiming to relieve immediate financial pressure and help them make use of government support measures.

The COVID-19 crisis forces companies to navigate through uncharted territory. Yet, I am confident that we can address the challenges, achieve our strategic goals and enter a new phase in OPAP's evolution. In this framework, I would like to refer to the recent changes in OPAP's top management.

After four years as CEO and Executive Board Member, Damian Cope left OPAP on 31 May 2020. On behalf of OPAP's Board of Directors and personally as well, I would like to wish Damian all the best for the future and also to warmly thank him for his significant contribution to OPAP's solid results and to the progress achieved across all of the company's strategic priorities, including the technology, network and product modernization initiatives.

Until a new CEO is appointed, Jan Karas, as Acting CEO, assumes all CEO responsibilities, with the exception of Human Resources duties, which are exercised by Deputy CEO, Odysseas Christoforou. I am convinced that OPAP's top management has the skills and the experience to deliver the leadership needed by the company today and to lay the foundations for future growth.

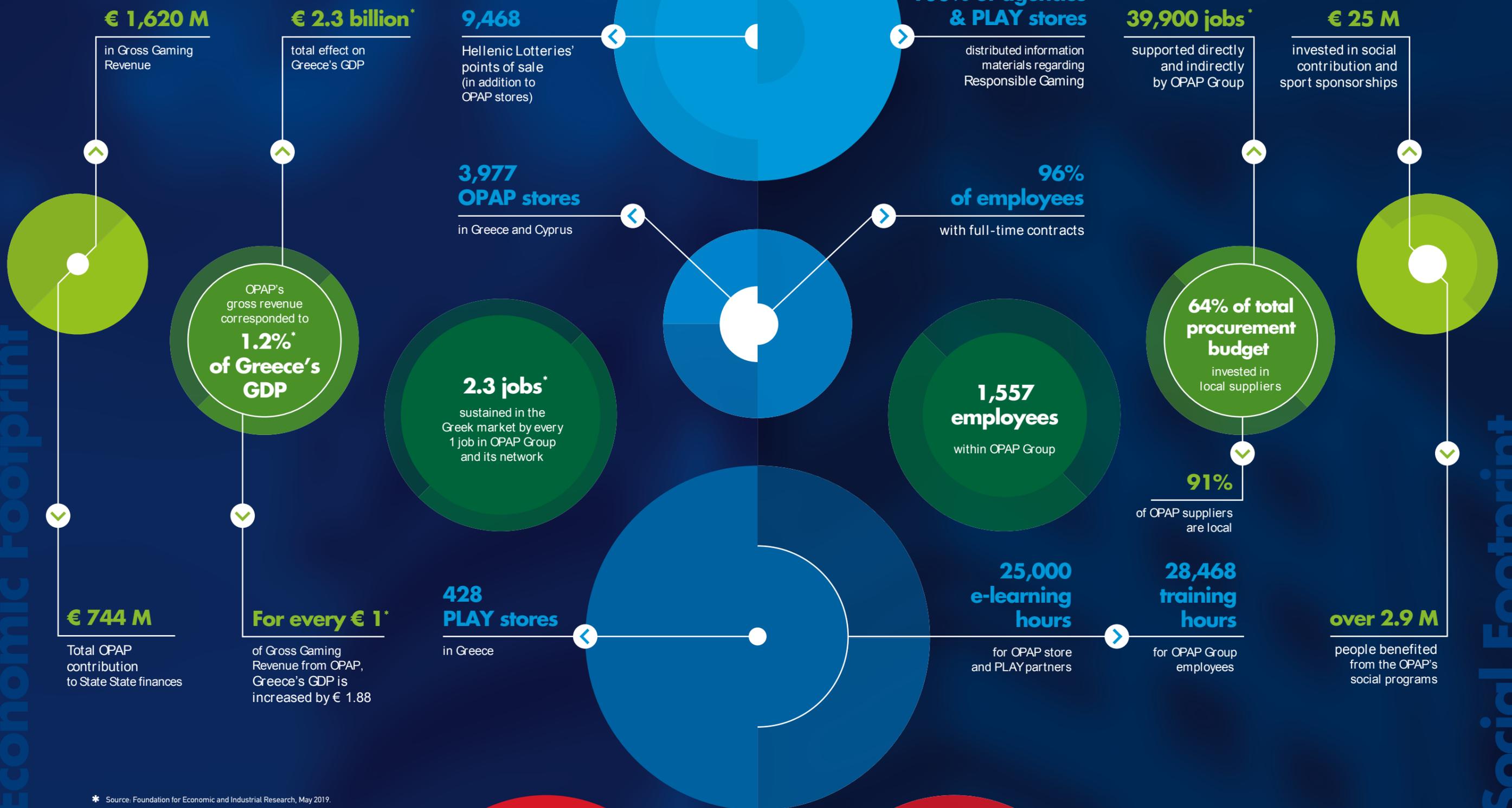
In closing, I would like to thank all the OPAP colleagues for making 2019 another successful year. I am confident that everyone's hard work and professionalism will play a great role in overcoming the COVID-19 crisis too. I would also like to thank our shareholders, stakeholders, agents and business partners for their support.

Thank you,

Kamil Ziegler
Executive Chairman

B. Our Socio-Economic Impact

OPAP Group is the leading gaming organization in Greece and Cyprus, with a vision to establish itself as a world class gaming entertainment company. Through our operations in 2019, we achieved solid results, delivering a significant socio-economic impact.



Economic Footprint

Social Footprint

* Source: Foundation for Economic and Industrial Research, May 2019.

Who we are

CHAPTER C



In this section

- 1. Our Company
- 2. Our Industry
- 3. Our Games Portfolio
- 4. Our Technology Capabilities



C. WHO WE ARE

C.1 Our Company

OPAP is the leading gaming company in Greece and one of the most renowned in its industry worldwide. Founded in 1958, the company operates and manages numerical lotteries, sports betting games, horseracing mutual betting, lotteries, instant win games and video lottery terminals (VLTs) in Greece. Moreover, OPAP holds a leading position in the sector in terms of embedding the global Responsible Gaming principles in its operations.

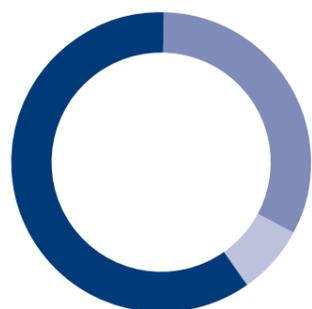
The vision for 2020 is to establish OPAP as a world-class gaming entertainment company. Long-term strategic priorities focusing on customers, people, network, products and digital-technology capabilities have been established and placed at the center of actions towards the realization of the vision. Moreover, OPAP holds a prominent position among corporate social champions in Greece. Through its extensive Corporate Responsibility program, which focuses on Health, Sports and Employment, the company supports Greek society in practice.

OPAP Group of Companies

Company	Holding	Country of Incorporation	Main Activity
OPAP S.A.	Parent company	Greece	Numerical, lottery games and sports betting
OPAP Cyprus LTD	100%	Cyprus	Numerical and lottery games
OPAP Sports LTD	100%	Cyprus	Sports betting
OPAP International LTD	100%	Cyprus	Holding company, services
OPAP Investment LTD	100%	Cyprus	Holding company, services
Hellenic Lotteries S.A.	83.5%	Greece	Lotteries
Tora Direct S.A.	100%	Greece	Payment services
Tora Wallet S.A.	100%	Greece	eMoney institution
Horse Races S.A.	100%	Greece	Horse races, mutual betting on horse races
Neurosoft S.A.	67.72%	Greece	Provision of software services
TCB Holdings LTD	36.75%	Malta	Online betting

Our shareholder structure consists of 321.6 million authorized common shares listed in the Athens Exchange with a par value of € 0.30 per share.

Shareholder structure on 31.12.2019



60%

Remaining Free Float

32.7%

Emma Delta Hellenic Holdings Limited

7.3%

Sazka Group

C.1.1. Our Brand

In 2019, the OPAP brand remained focused on its purpose to deliver world-class gaming entertainment, within a trusted environment, by enabling customers to "Live the Game" in daily life, beyond winning or losing. This was inherent in everything that was planned and communicated: games, stores and experiences.

Moreover, as a trusted organization, OPAP continued to interact with its customers via the "mathetonopap.gr" platform, which is designed to answer questions regarding OPAP operations and games.

Through a tailor-made credibility campaign, OPAP provided clear answers to 3 questions most frequently asked by customers about our games: 1) Why we never get to know the names of major prize winners; 2) Is it possible for OPAP to know where winning SCRATCH tickets are in specific batches; 3) Who guarantees the validity of draws?

OPAP "Live the Game"

Various initiatives were implemented in 2019 to further capitalize on our brand, in 2019. Among other projects, we created the first interactive underground passage in Greece, which inspired by the "world of OPAP" and branded with our slogan "Live the Game". We managed to transform a dull, grey underground passage into a visit-worthy city landmark, with the help of renowned artist "b.", who has created murals and projects and held exhibitions in Miami, New York, London, Beijing, Tokyo, Rio De Janeiro etc. OPAP installed motion sensor lights, interactive drum pads, neon signs and music to the formerly ordinary underground passage, turning it into another OPAP-led opportunity for fun in the city.



Sports Events - Experiential Pillar

In 2019, we focused on creating unique entertainment experiences for our audiences, as part of our brand proposition. In this framework, we sponsored 19 events in 12 different cities reaching out to more than 300,000 people.

In addition, through this pillar, we managed to raise OPAP's sponsorships awareness to the first place by reaching 69%, whereas the 2nd place contender achieved a 55% score, according to research results.

It is also worth mentioning that through these events, OPAP scored higher in crucial research indicators, with relevant positive opinions rising from 39% to 45%. Additionally, research shows that people enjoy events in which they can actively participate and events related to a contemporary way of living.

OPAP Champions

The OPAP Champions program ran for the second consecutive year in 2019. Through this program, OPAP supports upcoming athletes and helps them to step up and overcome their daily difficulties, by sponsoring their daily training needs and helping them build their public profile. In 2019, the OPAP Champions team achieved great results both in sport and their studies, while significantly increasing their followers on social media.

Apart from their very active sports program, the athletes are very keen in participating and supporting almost every sponsorship, corporate social responsibility event and activity that OPAP organizes.

On top of that, the audience of our social media channels actively follow the athletes and is exhibiting an invested interest in them. This is evident from social media "likes" and "views", and subsequently from the high engagement rate, reaching 4.58%, the company's highest (approximately 3% for the rest of the company's assets).

"Game Time" powered by OPAP

In July 2019, we launched "Game Time", OPAP's first-ever sports entertainment show, broadcast every Friday at OPAP stores across Greece and OPAP's social media channels, to showcase upcoming sporting action in major leagues and competitions. The program aims at providing unique and exclusive content for OPAP customers, aligned with our entertainment brand positioning. Each week, leading sporting stars and experts visit OPAP headquarters for interviews. In 2019, 21 weekly episodes were produced, which were heavily reproduced on social and mainstream media, thus increasing engagement and visibility among various audiences.



C.1.2. Our Regulatory Framework

Similar to most European countries, the Greek gaming sector is regulated and controlled by an independent administrative authority, the Hellenic Gaming Commission (HGC).

The HGC's objectives are to regulate and control the gaming sector and set standards to ensure that gaming and betting in Greece are organized and conducted in a lawful, transparent and fair manner, are not subject to illegal activities or exploitation, and that the interests of players and society is protected.

Activities of the HGC are conducted within a series of regulations that either refer to the overall gaming sector (e.g. Decision no. 129/2/07.11.2014, as currently in force, Decisions no. 155/6/24.04.2015, 163/6/09.07.2015, 166/5/23.07.2015 in accordance with Law no. 4557/2018, concerning tackling money laundering and terrorism financing) or that relate to specific games or gaming categories.

Gaming Concession

On 15.12.2000, in accordance with Article 27, paragraph 2A of Law no. 2843/2000 (GG A' 219/12.10.2000), we entered a 20-year concession agreement with the Hellenic Republic and have been granted the exclusive right to conduct, manage, organize and operate numeric, sport forecasting and betting games by any appropriate means relevant to the current technology.

The agreement was extended in December 2011 and is valid until October 12, 2030 except for online sports betting activities, for which OPAP is currently under a temporary licensing regime as explained in the [Online Gaming](#) section.

Under the terms of the concession agreement and in accordance with the terms of Article 27, paragraph 9A of Law no. 2843/2000, OPAP was granted the exclusive right to operate and manage any new sports betting games in Greece as well as the right of first refusal to operate any new games permitted by Law. According to subparagraph C, paragraph 9 of said Law, the right of first refusal shall apply in favor of OPAP for a period of 20 years after the publication of Law no 2843/2000 and more precisely until 12.10.2020.

Lottery Concession

The Lottery Concession, which was ratified by Law no. 4183/2013, granted OPAP the right to exclusively operate Hellenic State lotteries.

VLT License

According to the provisions of Article 39 of Law no. 4002/2011 and following the issuance of the relevant decision (VLTs license) of the Minister of Finance (GG B' 2503/4.11.2011) and the conclusion of the VLTs Agreement dated 4.11.2011 between OPAP S.A. and the Hellenic Republic, we initially held an exclusive 10-year license to install and operate 35,000 Video Lotteries Terminals (VLTs) in Greece, out of which 16,500 would have been installed and operated directly by OPAP through its network, while 18,500 would have been operated by concessionaires, to which OPAP would have conceded, against consideration and following an international tender, the right to install and operate them.

However, the amendment of Article 39 and 40 of Law no. 4002/2011 in November 2017, under the provisions of Article 3 and 4 of Law no. 4499/2017, led to the respective amendment of the VLTs license on 17.1.2018 (GG B' 77/22.1.2018) and of the VLTs agreement on 19.1.2018. The number of VLTs was reduced to 25,000 self-operated machines and the VLTs license duration was extended to 18 years, starting from the 11th of January 2017, according to Article 39 paragraph 4 Law no. 4002/2011 and the HGC's decision no. 331/3/7.6.2018 (GG B' 3048/27.7.2018), which confirmed the start date of commercial operation of the first VLT, while also indicating OPAP's obligation to ensure deployment of all VLTs until 31 December 2019 (Article 40 paragraph 1 of Law no. 4002/2011). Following formal certification by the Hellenic Gaming Commission (HGC) the Company successfully met this target within the predetermined deadline.

The HGC issued the Decision no. 225/2/25.10.2016 (GG 3528 B'/01.11.2016), regarding the installation and operation of VLTs (2016 VLTs Regulation).

On April 2, 2019, the Council of the State issued a ruling (CoS Decision no. 632/2019) that annulled the Hellenic Gaming Commission's (HGC) Decision no. 225/2/25.10.2016.

The adverse impact of the CoS decision was ultimately addressed by issuance of an Act of Legislative Content ("PNP" per the Greek acronym on 27 June 2019), providing that:

- (a) The (overall) Games Regulation provided for in Law no. 4002/2011 shall be issued not as a Presidential Decree, but as a decision of the Minister of Finance, following an opinion by the HGC.
- (b) For a transitional period of 12 months after the publication of the PNP and until the issuance of said general Games Regulation, the provisions of the 2016 VLTs Regulation shall continue to apply with the force of law.
- (c) Within a period of three (3) months following the issuance of the above mentioned Games Regulation (in the form of a Ministerial Decision as mentioned above) and, in light thereof, the HGC shall review afresh any gaming halls, machines and games' certifications issued under the 2016 VLTs Regulation provisions and their validity will be either confirmed (if found conformant to said general Regulation) or replaced with new certifications.

The above provisions were finally enacted by Article 86 of Law no. 4623/2019, which was published on 9 August 2019 (GG A' 134). More specifically, Article 86 paragraph 2 of said Law, stipulates that the 2016 VLTs Regulation shall continue to apply with the force of law for a transitional period of 12 months after the publication of Law no. 4623/2019 until issuance of said general Games Regulation.

Consequently, the (overall) Games Regulation provided by Law 4002/2011, shall be issued until 9.8.2020, not as a Presidential Decree, but as a decision of the Minister of Finance, following an opinion by the HGC, since the 2016 VLTs Regulation shall not apply beyond that date.

Horse Racing Concession

After abiding to all terms and conditions provided on the Accession Agreement between Hellas Horse Races S.A. and Hellenic Republic Asset Development Fund, the company holds the exclusive right to organize and conduct land-based and online horseracing mutual betting in Greece for 20 and 5 years respectively, with its horse racing operations commencing in January 2016.

Online Gaming

On 19.07.2019, the Council of State issued a ruling that annulled the Hellenic Gaming Commission's decision 105/2/16.05.2014, which regulated the offering of online fixed-odds betting by OPAP S.A.

Law no. 4635/2019 (Government's Gazette A' 167/30.10.2019) amended Law no. 4002/2011 regarding online sports betting activities. The new law defines details for the licensing of operators, technical requirements for the operation of the information system and other prerequisites the operators should comply with. According to the new law, a new temporary licensing regime system was introduced, by which two types of licenses are available: online betting license and other online games license, until the definite award of online licenses under the terms and conditions of the new online law.

OPAP is also supervised by a three-member Supervisory Committee, which is established by the provisions of Article 28, paragraph 3A of Law no. 4002/2011, in order to ensure that OPAP and its agents comply with the legislation in force and OPAP's contractual obligations towards the Hellenic Republic.

The Committee specifically monitors OPAP's conduct regarding the following topics:

Compliance with the terms of the gaming concession, the VLTs' license and the gaming legislation.

- Protection of consumers against excessive participation and crimes related to games of chance.
- Protection of minors and other vulnerable groups.
- Reliability of games and players' winnings.
- Protection of personal data.
- Payment of taxes and participation of the Hellenic Republic.

C.1.3. Memberships

OPAP Group companies participate in a number of organizations and committees, relevant to their operation.

Organizations	<ul style="list-style-type: none"> World Lottery Association (WLA) European Lotteries Association (EL) Hellenic Federation of Enterprises (SEV) Hellenic Network for Corporate Social Responsibility European Pari Mutuel Association (EPMA) (Horse Races) Global Lottery Monitoring System (GLMS) Hellenic Institute of Customer Service Hellenic Institute for Entrepreneurship & Sustainable Development
Working Groups	<ul style="list-style-type: none"> European Lotteries Public Affairs Coordination Working Group (ELPAC) European Lotteries Sport Working Group (EL Sport) European Lotteries Security and Integrity Working Group* World Lottery Association Security and Risk Management Working Group*

* OPAP participated in these working groups until Summer 2019.



C.1.4. Recognitions

In 2019, we received more than 30 awards, in the fields of communications, sponsorships, social and digital media, among others. We have gained great brand recognition through our performance, also contributing to increased team morale and customer attraction.

Award Event/ Awarding Authority	Type of Award/ Distinction	Category	Reason
Ermis Media Awards	Gold award	Games advertising	Creative flipbook in print promoting Scratch "Second Chance"
2019 IAB MIXX Awards	Gold award	Cross-media integration	Pame Stoixima offline – interactive video for "Navagoi" campaign
Sports Marketing Awards	Platinum Award	Best sports sponsorships	
	Platinum Award	Sports brand of the year	
	Gold Award	Public Relations Strategy - Media Campaign	The Hoops for Hope campaign
	Gold Award	Sponsorship of Team - Athletic Club Association	OPAP sponsorship of the Hellenic Wheelchair Basketball Federation (HWBF)
	Gold Award	Design - Branding	The materials' upcycling program "Let Them Live Again"
	Gold Award	Engagement – Experiential	"Contribution Squad"
	Gold Award	Sponsorship of Athletic Event – Program	Kerkida OPAP
	Gold Award	Kids – Youth – Grassroots	OPAP Sports Academies Festivals
2019 Event Awards	Gold Award	Thematic events - sports	Laser Football – OPAP "Live the Surprise"
	Gold Award	Thematic events – philanthropic	OPAP contribution squad at the Authentic Athens Marathon
	Gold Award	Best brand and experiences – pop-up	OPAP Sports Academies Festivals
Sales Excellence Awards	Two Gold Awards	Distinction in sales and business development	505 new OPAP stores in one year
	Gold Award	Distinction in education and development of sales	OPAP stores sales team reorganization
	Gold Award	Distinction in organizing and sales techniques	Automated processes, projects and reports for more efficient sales management
Marketing Sales Awards	Gold Award	Distinction in retail marketing	Mega Play stores
National Customer Service Awards	Gold Award - Contact center of the year	Sales operation	

C. WHO WE ARE

C.2 Our Industry

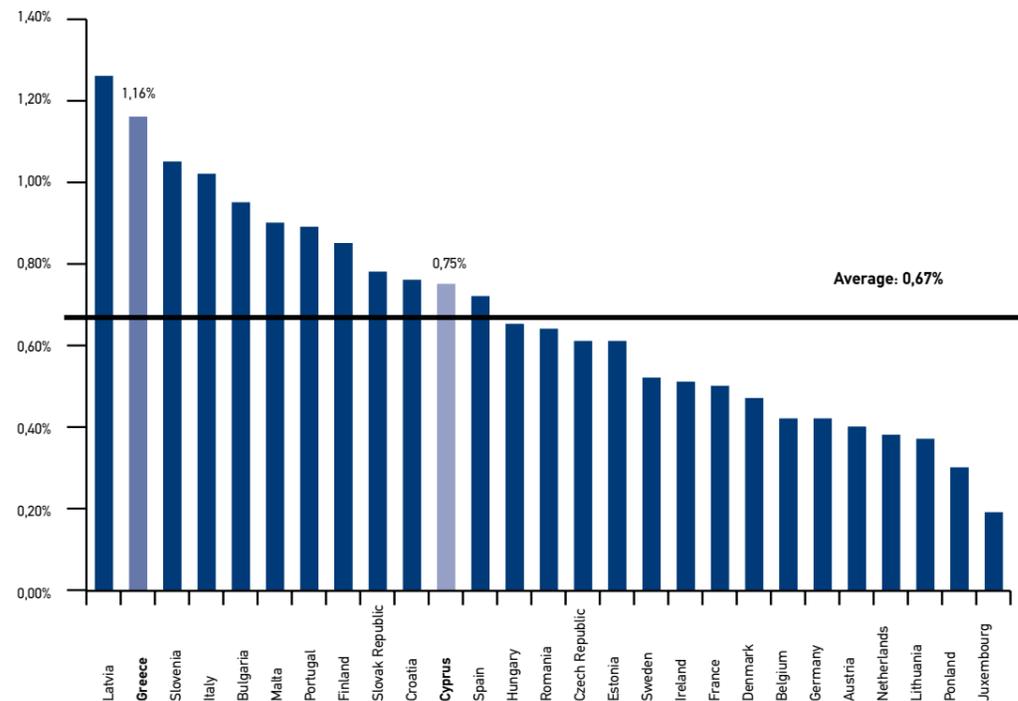
As one of the most established and dynamic business sectors, the Greek gaming market consists of the following six main sub-sectors:

- Numerical games.
- Sports betting and horseracing mutual betting.
- Video Lottery Terminals (VLTs).
- Instant and passive lotteries.
- Casinos (includes all games played in casinos).
- Online offshore.

In 2019, Gross Gaming Revenues (GGR) from regulated operators in Greece were estimated to be approximately € 2.2 billion and the Greek gaming sector accounted for 1.16% of the country's GDP (Gross Domestic Product).

According to H2 Gambling Capital (H2GC, the leading source of data regarding the global gambling industry), Greece ranks 2nd, among the 27 EU countries, in GGR as a % of GDP. In the same category, Cyprus ranks above average among the 27 EU countries

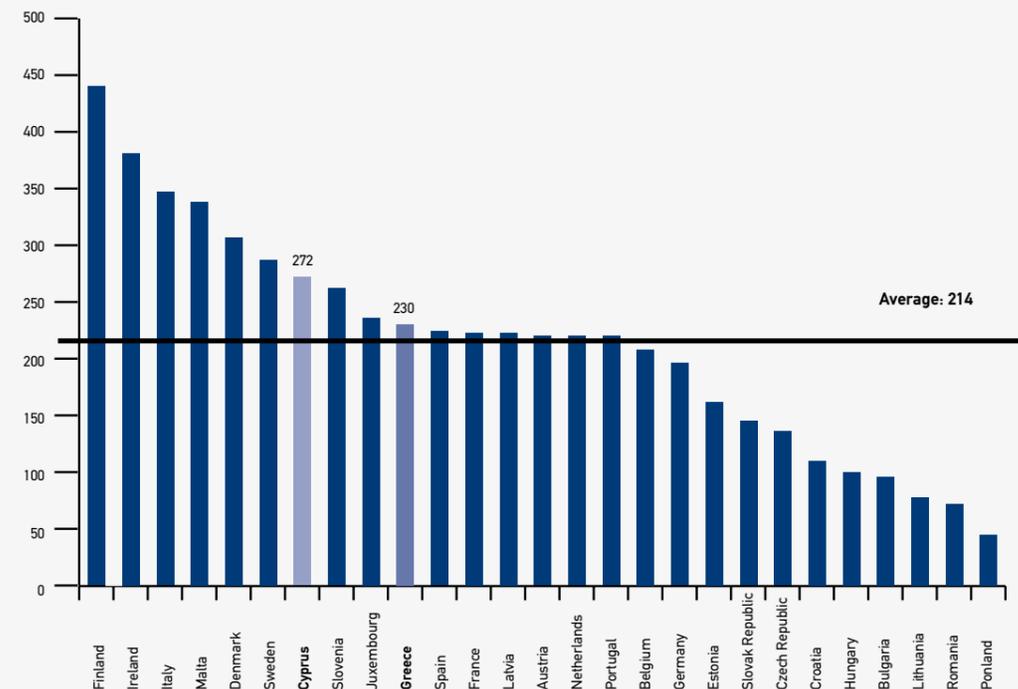
GGR as % of GDP (All 27 EU countries)



Source: H2GC, April 2020. Greek numbers have been adjusted for OPAP's reported figures.

Gross Gaming Revenue in 2019

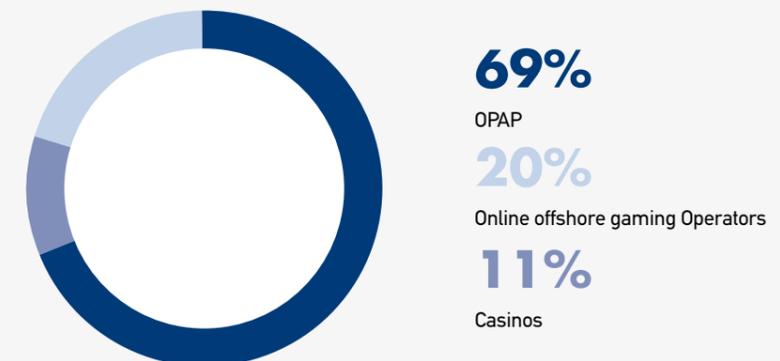
GGR in Europe per adult in 2019



Source: H2GC, April 2020. Greek numbers have been adjusted for OPAP's reported figures.

Based on 2019 figures for Greece, OPAP held a 69% GGR market share, mainly due to the success of higher VLTs contribution and sustained KINO performance.

2019 GGR in the Greek Gaming sector





C. WHO WE ARE

C.3 Our Games Portfolio

C.3.1. Our Products and Services

Our Games Portfolio is divided into fixed odds betting games (with the final amount being fixed and made known to players at the time of betting) and mutual betting games (where all bets of a particular type are collected and then the yield is calculated by distributing the concentrated bets to the winners).



The following pages elaborate on the betting and numerical games that have been at the top of our customer's preferences, since the initiation of our betting operations in the market, as well as games that have recently been introduced to the market and are steadily gaining popularity. These games have been the centerpiece of our success, generating the majority of our Gross Gaming Revenue.

C.3.2. Betting Games

The sports betting games category includes the fixed odds game PAME STOIXIMA and [PAME STOIXIMA Virtual Sports](#) and the mutual betting games PROPO, PROPOGOAL, HORSE RACING STOIXIMA.



PAME STOIXIMA is a betting game released in 2000. The game includes constant fixed betting odds and pari-mutuel betting odds (only apply for horse racing) and requires the player to correctly predict the result or outcome of a sporting or entertainment event. Players can place their bets either through our retail network across our nationwide stores or online through the new Pamestoixima.gr platform available on web or mobile.

In 2019, we managed to enhance our sportsbook product by offering an even wider range of events and betting markets, both for pre-match and live, while also launching new promos which enhanced our customer's value proposition. The new Live Channel in stores offers all day live content broadcasting with in-play data and ultimately boosts in-play betting and was piloted successfully in 2019. Furthermore, the new OPAPP mobile app offers players the ability to cash-out their bets wherever they are and be paid in stores, as well as easier bet slip creation and live bet tracking. We also improved our players' in-store experience by upgrading our Digital Signage touchpoints across Pame Stoixima screens.



Since January 2016, PAME STOIXIMA offers pari-mutuel betting on Horse Races. We offer Greek races from Markopoulo Park and a daily schedule of 27-30 races in common pools from the largest providers worldwide.



In May 2017, OPAP launched PAME STOIXIMA-Virtual Sports across all agencies, in order to offer a new sports betting experience to sports enthusiasts. The Virtual Sports platform features simulated virtual football matches, with advanced and highly realistic computer graphics, where players are called to predict the outcome of matches. Players submit their predictions over-the-counter and through Opapbet terminals (SSBTs). There are 270 virtual matches offered every day. The game software determines virtual teams' dynamics, based on objective historical data from the respective actual teams, real-life results and their actual ranking.

In November 2018, we launched a second Virtual Football channel, called Matchday. In contrast to the existing Virtual Football product which offers the opportunity to bet on one match, Matchday simulates 8 matches simultaneously, enabling multiples and system betting. Matchday is presented in the form of a league (e.g. Greek Super League, Premier League, etc.) and features a variety of statistics and betting markets.

In 2019, all initiatives aimed to further upgrade customers' experience, with relevant product enhancements. Starting in the second quarter, Virtual Matchday introduced new simplified screens while the main single-match Virtual Football product enhanced its offering with new screens, new slip options and two new markets, that up until then were only available via Opapbet terminals (SSBTs). Moreover, the new slip for Virtual Football offered a consecutive games option, a feature well welcomed by players. The enhancements continued until the end of the year, by adding useful messages on product screens, triggering players' interest and facilitating relevant betting.

All product enhancements resulted in customer base increase, bringing 5% more players in the game (vs last year) and higher customer satisfaction.

C.3.3. Numerical Lottery Games

Numerical Lottery Games were the games that contributed the most to our Gross Gaming Revenue and consist of six games: the fixed odds games KINO, SUPER 3 and EXTRA 5, as well as the mutual games TZOKER, LOTTO and PROTO.



KINO was launched in 2003 and is offered in all agencies since 2004. KINO is currently our most successful game. The game involves an electronic integrated encryption system which generates random numbers. The player is required to select between 1 or 12 numbers. The electronic system then draws 20 numbers from a total of 80. Depending on how many numbers the player has chosen to play with and how many numbers from the player's selection coincide with the system's draw, the respective earnings are calculated. Draws are held every 5 minutes with a total of 180 draws taking place per day.

Additional features for the player include:

- "KINO BONUS" is the last number of the draw. If one selects to play with KINO BONUS, he/she is then eligible for multiple wins.
- "Odds-Evens" allows the player to choose if a KINO draw result will have more odd or even numbers or if there will be a tie.
- "COLUMNS" requires the player to predict which Column (out of 10) will have the most numbers drawn.

Throughout 2019, more than € 1.4 billion were distributed to all KINO players. Furthermore, the offering of KINO through self-service betting terminals (SSBTs) was successfully launched in May 2019 and is currently provided through SSBTs in around 1.900 OPAP stores.



TZOKER was launched in 1997 and it is the most popular game in OPAP's portfolio. The player must correctly predict 5 numbers (basic numbers), which are drawn from a range of 45 numbers (1 to 45), and an additional number drawn from a range of 20 numbers (1 through 20). Players can play in single columns or systems (e.g. full, standard or a combination) and claim winnings from 8 categories.

TZOKER has gained extensive appeal throughout our player base and has become the most popular game of chance in Greece due to - among others - its impactful commercial advertisements and the large amounts of winnings for players.

In its 21 years of operation, the game has distributed more than € 1 billion to 1st tier winners and an additional € 1.5 billion to the winners of other tiers. The highest winning amount of the game in a single draw was € 19.3 million and was distributed on 15/04/2010.

In March 2019, OPAP for the first time in Greece, offered the most popular lottery game online aiming to make TZOKER more accessible and convenient to play through any type of device whether smartphone, tablet or computer. OPAP launched a dedicated playable website and application enabling players to test their luck with TZOKER. The "tzoker.gr" platform was designed in-house focusing on an omni - channel customer experience, while protecting personal data, securing transactions and remaining compliant with regulations.

To make playing experience more fun, online exclusive features were introduced at tzoker.gr, such as the ability to save favorite numbers, resubmit the same slip with one-click, notification and instant credit of winnings. Moreover, we made loyalty offers, based on behavioral and playability criteria. A dedicated, in-house Customer Support Team is available to help customers at any time, while the Online Operations Team facilitates and continuously improves all customer-facing procedures.

In 2019, more than 140,000 customers have tested their luck online at tzoker.gr and have shared winnings of more than € 12 million.

C.3.4. Video Lottery Terminals



Video Lottery Terminals (VLTs) are electronic machines, certified by the Hellenic Gaming Commission and are used to conduct games of chance. OPAP commenced its VLTs operations in 2017 and completed the roll-out of 25,000 VLTs at the end of 2019 in Play Gaming Halls as well as in selected agencies. In 2019, we further enriched the product proposition with more than 25 new games, totaling 100 Play games offered. In April 2019, OPAP launched one of the biggest worldwide Jackpot pool in VLTs with 25,000 machines participating in a 3 level national Jackpot.

Each terminal is a stand-alone machine with a random-number generator, in which the outcome of each wager is random. In order for players to access the games of chance conducted through VLTs, players must be over 21 years of age and are required to submit the Individual Player Card (IPC) issuance application form and abide with the terms of the [Accession Agreement](#). Through this procedure players receive their individual IPC, acknowledging the terms of issuance, management and operation of the IPC and of the agreement.

C.3.5. Passive and Instant Lotteries

Since 2014, Hellenic Lotteries S.A. (member of the OPAP Group of Companies) has been operating Passive and Instant Lotteries. We offer three different types of games under the umbrella of Passive Lotteries, namely LAIKO (a weekly jackpot draw game, which also offers a prize of € 100,000 per week), ETHNIKO (the only subscription game in Greece in which every player participates with his/her unique number) and STATE Lottery (also known as NEW YEAR's Lottery, which is the most traditional draw game and its draw takes place in New Year's Eve). Instant lotteries include the "SCRATCH Luck in an instant" (SCRATCH) brand, which consist of games requiring players just to scratch-off the playing area of the ticket, to find out if they have won and receive their potential winnings immediately.



In 2019, ETHNIKO Lottery game had its first year of a redesigned offering, increasing the overall number of winners. ETHNIKO's new editions are more affordable, reducing the number of renewals from 6 to 4, and increasing significantly the number of winners who can win between € 200 and € 5,000.

In 2019, the LAIKO Christmas Special Edition established its presence as a thematic and seasonal game of luck.



SCRATCH games have been successful due to their:

- high winning rates, e.g. up to € 1,000,000;
- their diversity with different themes and 5 different price tiers of € 1, € 2, € 3, € 5 and € 10; and
- their extensive sales network.

In 2019, SCRATCH expanded its customer base to over 1.3 million players, reaching more customers with innovative concepts like gifting games. For 2020, the aim is to sustain the market penetration, while improving on playing frequency with novelties like non-monetary prizes and regular payment games.

Passive and Instant Lotteries are available at OPAP agencies and street vendors, while SCRATCH games are also available at convenience stores, kiosks, gas stations, super markets and post offices.

C. WHO WE ARE

C.4 Our Technology Capabilities

In 2019, technology continued to be a key enabler for the achievement of objectives spurring from our eight strategic priorities, thus taking OPAP a step closer to the fulfillment of the 2020 Vision. Our performance in this field was driven by two pillars: the management of the successful delivery of all major vendor operating Service Level Agreements (SLAs) and the delivery of internal SLAs for all in-house solutions.

Throughout 2019, OPAP managed to harness technology and its new internal capabilities to deliver new gaming propositions to customers with minimum additional investment in hardware and software assets, building on the foundation of the technology transformation program, which was successfully completed the previous year.

OPAP fostered technology innovation and launched products in new channels, such as Tzoker Online and KINO on Self Service Betting Terminals (SSBTs). OPAP has adopted best practice industry standards in the delivery of these new products, such as agile delivery methodologies, which underpin ongoing innovation.

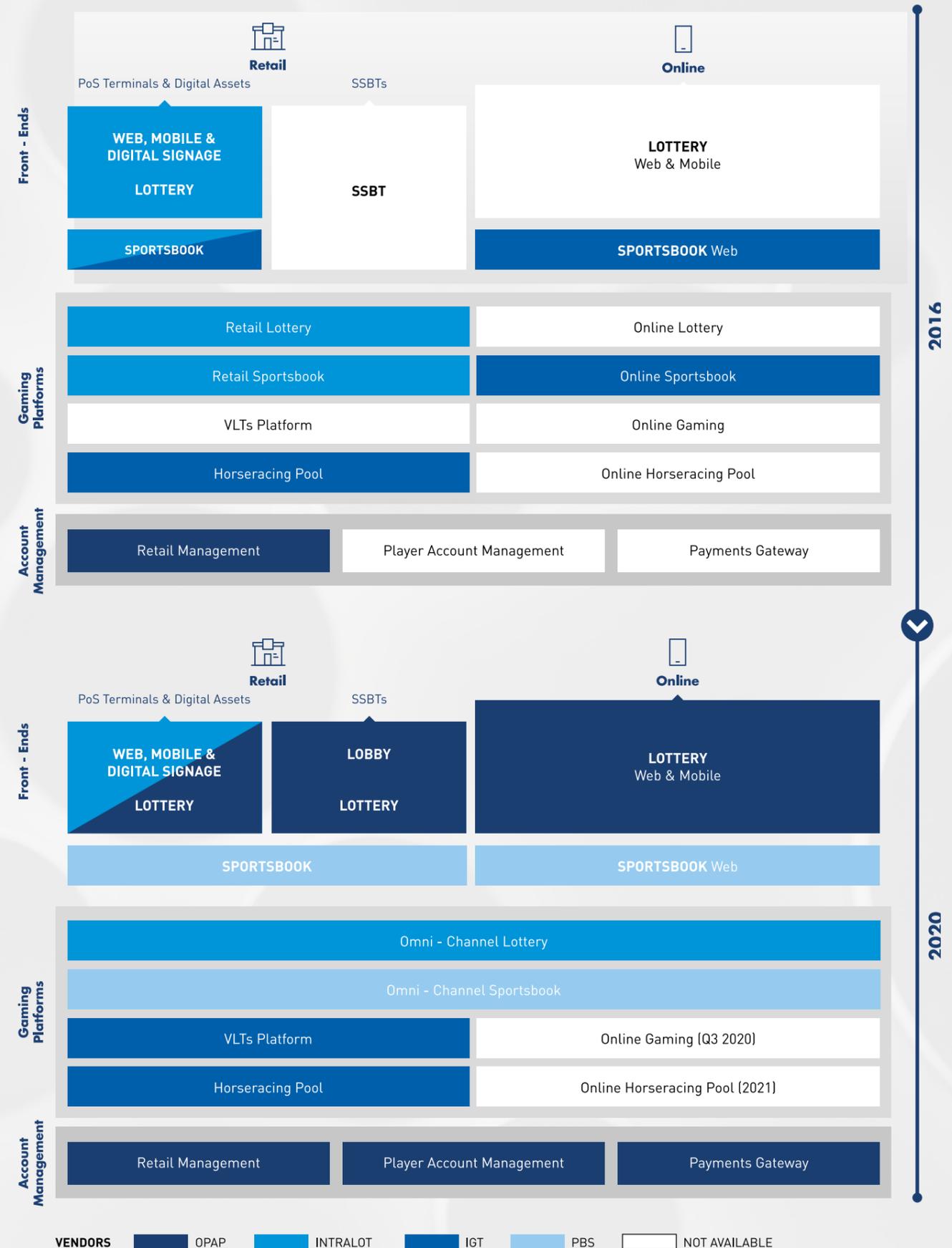
OPAP also introduced brand new game features, such as the VLT Jackpot, and reinvigorated its engagement with players through the launch of the OPAP loyalty program, refreshing its overall gaming proposition.

In addition, OPAP achieved the restructuring of key technology platforms, transitioning to new generation solutions, like Intralot LOTOS 10 for numerical games, and migrating Pamestoixima.gr to a new Playtech BGT Sports platform. These are state-of-the-art gaming platforms by international standards and will enable OPAP to achieve a faster time-to-market introduction of new game features across retail and digital channels.

[See section for details on Progress made since 2016](#)



Progress made since 2016



Corporate Governance

Establishing a robust governance framework

We have established a robust and structured governance framework that is transparent, fair and disciplined and in which our strategic priorities and core values are firmly embedded.

The following pages present part of the key features of our framework. For more information on our Corporate Governance framework, please refer to the [2019 Annual Financial Report](#) and our [corporate website](#).

CHAPTER D

In this section

1. Chairman's Statement
2. Governance and Leadership
3. Members and Relevant Experience
4. Audit Committee Report
5. Remuneration and Nomination Committee Report
6. Executive Committees
7. Corporate Responsibility Management

D. CORPORATE GOVERNANCE

D.1 Chairman's Statement

The Board believes that implementing and maintaining high governance standards underpin our business objectives and our drive to create and maximize shareholder value whilst managing the business effectively, responsibly and with integrity, so that we demonstrate accountability and maintain the trust of all of our stakeholders. We are constantly seeking to develop our practices and governance framework, in order to ensure that transparency and good governance permeate through the Group at all levels. In addition to compliance with the guidelines from regulatory and governance bodies, the Board wishes to ensure that high ethical standards are reflected in our business behavior and culture through OPAP's Group Code of Conduct, which was approved by the Board in 2015 and amended in 2016. The Company's management and employees have acknowledged in writing that they have read and understood the Code and that they will adhere to and comply with its principles and provisions, as amended from time to time.

The Company updated its Code of Conduct in 2018. The updated Code, which establishes a structured framework applicable to OPAP S.A. and its subsidiaries and proves that OPAP is a transparent organization acting in accordance with the principles and rules of the Code of Conduct, as well as its legal and regulatory obligations, was approved under the Resolution of the Meeting of the Board of Directors of OPAP S.A. that was held on 13 December 2018.

The Company has established a structured framework of policies, processes, principles and roles to ensure that OPAP S.A. and its subsidiaries comply with the applicable legal, regulatory and contractual framework and take preventive measures to limit possible risks.

In this respect, OPAP S.A. applies a Whistleblowing Policy, under the responsibility of the OPAP Group Regulatory and Compliance Officer, which applies in case of violation of the Code of Conduct or other serious violation of the applicable framework. The Company has therefore established the Whistleblowing Complaints Policy by which employees can and should report to the Company valid allegations of known or suspected alleged Improper Activities.

Furthermore, the Company established an Audit Committee which, among other things, monitors the effectiveness and adequacy of the risk management framework, the policies and systems of the Company and the Group. It also monitors the effectiveness of the system which monitors compliance with the laws and regulations and the results of the administration's research and follows up on disciplinary measures of non-compliance complaints.

Risk Assessment and Management

The Board monitors the level of risk through the Group's major risk assessment process. Remaining committed to building and improving the understanding of the key risks the Group and its business operations are facing, the Group has adopted a relevant framework of reference.

Board Evaluation

The Hellenic Corporate Governance Code recommends that listed companies should undertake an evaluation of the Board at least once every two years based on a predefined process. The Board performs its annual evaluation internally.

Diversity

OPAP S.A. is an equal opportunities' employer that promotes an inclusive and diverse culture, and is committed to the promotion of equality through our workforce, customers, retailers and society. The Company operates based on the principles of corporate diversity and inclusion. The Board reiterates its view that facilitating and promoting diversity, in its broadest sense, has helped propel the Company's success to date. A standing practice is to ensure that the Company's Top executives, in particular, are open to fresh thinking and must include personnel from different backgrounds, who bring new ideas to the table. It is OPAP's policy to make decisions regarding recruitment and selection, remuneration, career development and training, transfers, promotion and succession planning based solely on merit – i.e. the skills, experience, qualifications and potential of the individual connected to the job – without regard to gender, age, sexuality, family circumstances, marital status, disability, religion, political preference, trade unionism or any other classification protected by the applicable law. Reference to the above policy is also made in the Code of Conduct of OPAP Group which is accessible in the [Company site](#).

Explanation on Non-conformities with the Code

The Board recognizes that the objective of the Code is to facilitate management's delivery of business success in a transparent and responsible manner. The Code does not impose a rigid set of rules and recognizes that certain actions and behaviors do not automatically imply poor governance. The Board provides an explanation for the following areas:

- The Board composition is considered satisfactory since it is comprised in its majority of non-executive directors from various industries, nationalities, and age groups. In addition, 4 independent members of the Board have been appointed, although Greek law requires a minimum of 2 independent Board of Directors, as they meet the requirements set out in the article 4 par. 1 of Law No. 3016/2002 and in the Hellenic Corporate Governance Code.
- Apart from strengthening the number of independent board members (currently 4 instead of 3), we also welcomed the first lady member of the Board of Directors in the context of enhancing diversity. It is further noted that the Board of Directors has two non-executive Vice-Chairmen, and the Audit Committee Chairman is an independent non-executive member of recognized international standing in the area of auditing.
- The Remuneration and Nomination Committee is composed of Non-Executive Directors, who are independent from executive tasks, including the two Vice-Chairmen of the Board and is considered adequate to fulfill its purpose.

Kamil Ziegler,
Chairman of the BoD
Athens, 31 March 2020

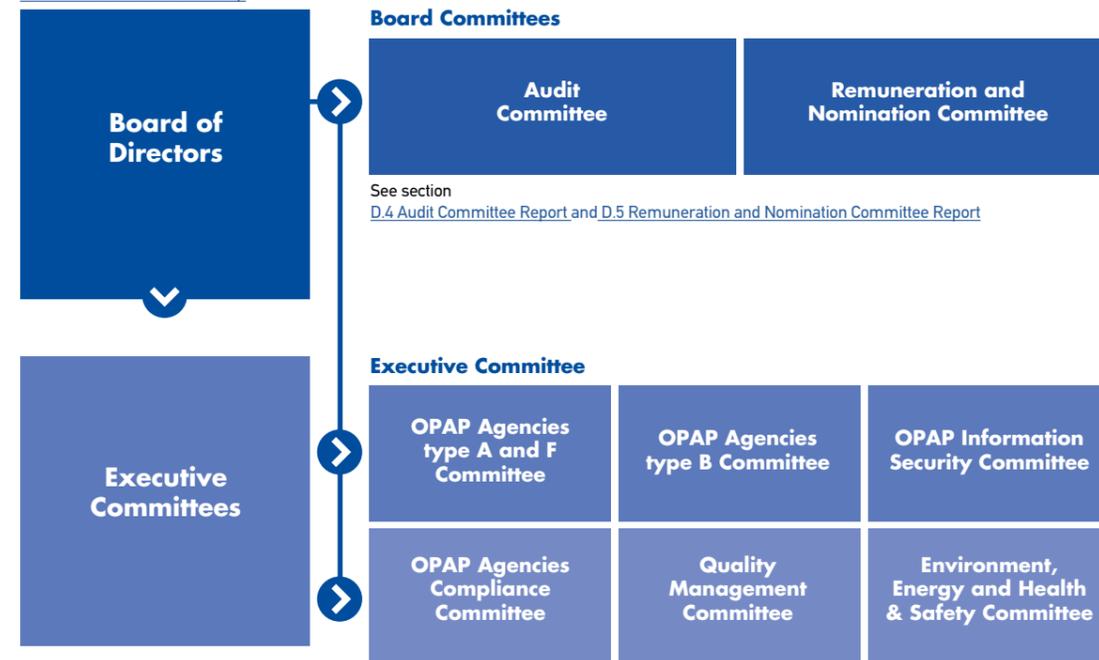
D. CORPORATE GOVERNANCE

D.2 Governance and Leadership

OPAP's governance structure enables the group to implement its strategic priorities and create value.

Corporate Responsibility Management

See section [D.2 Governance and Leadership](#)



See section [D.3.2 Meet Our Executive committee](#)

See section [D.6 Executive Committees](#)

Corporate Governance is the way in which OPAP is governed and controlled and we have adopted the Hellenic Corporate Governance Code, which is issued by the Hellenic Council of Corporate Governance (ESED), in order to facilitate a common understanding among our employees and generate added value for all our stakeholders.

The Corporate Governance framework:

- Delivers the structure, through which we set and manage our objectives, determine the methods to achieve them and monitor the Management's performance.
- Establishes standards of governance and best practices and promotes transparency.
- Reflects the policies and procedures to achieve good governance practices.

Board Role

The Board of Directors (BoD) is the supreme administrative body of the Company that mainly formulates the company's strategy and growth policy, while supervising and controlling its its management and administration of corporate affairs and pursuing its corporate purpose.

The BoD is competent to decide on every issue concerning the company's assets management, administration, representation and its operations in general, as well as to take all appropriate measures and decisions that assist the company in achieving its objectives, except for issues falling within the exclusive competence of the General Meeting, according to the provisions of the law or the Articles of Association.

Board Composition

The Board of Directors and the General Meeting of shareholders enhanced the number of independent members of the Board of Directors, as well as gender diversity among Board Members. The above initiatives have complemented the previous choices regarding the distinction of the role of the Chairman from that of the Chief Executive Officer and the appointment of two non-executive Vice-Chairmen. The Board meets regularly in principle, once per month, and organizes additional meetings (including by telephone, video-teleconference or written resolution) to review specific matters which it has reserved for decision. In 2019, there were fifteen regular Board meetings (plus thirteen additional meetings via rotation). There were eight Audit Committee meetings and six Remuneration Committee meetings.



Board Member Name	Position	Attendance	Representation	Executive Member	Independent Member
Kamil Ziegler	Chairman	15	-	☑	
Damian Cope	Chief Executive Officer	15	-	☑	
Spyridon Fokas	A' Vice-Chairman	15	-		
Pavel Šaroch	B' Vice-Chairman ¹	14	1		
Pavel Mucha	Chief Financial Officer ²	5	-	☑	
Katarina Kohlmayer	Member ³	2	-		
Robert Chvátal	Member ⁴	15	-		
Christos Kopelouzos	Member	8	7		
Stylianios Kostopoulos	Member	15	-		
Dimitrakis Potamitis	Member	13	2		☑
Rudolf Jurcik	Member	14	1		☑
Igor Rusek	Member	15	-		☑
Nikolaos Iatrou	Member ⁵	9	-		☑
Michal Houst	Chief Financial Officer ⁶	9	1	☑	
Pavel Horak	B' Vice-Chairman ⁷	11	3		
Marco Sala	Member ⁸	-	6		

¹ Mr. Pavel Šaroch, on 27.11.2019, by decision of the Board of Directors, was appointed as B' Vice-Chairman (in replacement of the resigned Mr. Pavel Horak).

² Mr. Pavel Mucha, on 26.09.2019, by decision of the Board of Directors, was appointed as Executive Member and Chief Financial Officer (in replacement of the resigned Mr. Michal Houst).

³ Mrs. Katarina Kohlmayer, on 27.11.2019, by decision of the Board of Directors, was appointed as Non-Executive Member (in replacement of the resigned Mr. Pavel Horak).

⁴ Mr. Robert Chvátal, on 27.11.2019, by decision of the Board of Directors, was appointed as Member of Remuneration & Nomination Committee (in replacement of the resigned Mr. Pavel Horak).

⁵ Mr. Nikolaos Iatrou, on 26.06.2019, by decision of the Board of Directors, was appointed as Non-Executive Member (in replacement of the resigned Mr. Marco Sala) and on 13.12.2019 by decision of the Extraordinary General Meeting of Shareholders was elected as Independent Non-Executive Member.

⁶ Mr. Michal Houst served as Executive Member and Chief Financial Officer until 26.09.2019.

⁷ Mr. Pavel Horak served as B' Vice-Chairman and Non-Executive Member as well as Member of the Remuneration & Nomination Committee until 27.11.2019.

⁸ Mr. Marco Sala served as Non-Executive Member until 25.06.2019.

Initial selection of BoD Members is conducted by the BoD itself, which delegates the relevant screening process to the Remuneration and Nomination Committee. The selection criteria taken into account are professional experience and expertise and are further defined by the Remuneration and Nomination Committee while, at the moment, there is no separate consideration of gender diversity during their selection. The company measures year-on-year progress to ensure improving diversity balance.

Main Delegation Subjects

The main subjects that the Board delegated in 2019 were the following:

- Significant business projects.
- Interest and capital expenditure projects.
- Final approval of annual budgets, business plans, organizational structure, advertising and sponsorships program.
- Approval of Financial Statements and shareholder communications.
- Treasury policies and changes to borrowing facilities or currency transactions.
- Regulatory compliance issues and related policies.
- Significant transactions with related parties.
- Review and approval of recommendations from the Committees of the Board.
- Protection of legal interests of the Company.

Members' Responsibilities

We have clearly defined our Board Members' responsibilities, as outlined below, to facilitate adherence to good Corporate Governance practices.

CHAIRMAN

According to the company's Articles of Association and Internal Rules and Regulations, there is a clear division of responsibilities between the Chairman and the CEO, which is a significant change compared to the past, when the position and duties of the Chairman of the BoD and CEO were unified. The Chairman presides over meetings of the Board of Directors, organizes and directs its work, and reports on it to the ordinary Shareholders General Meeting. The Chairman's competences are indicatively outlined below:

- Chair and ensure that Board meetings allow open debate and encourage effective contribution from individual Members, allocating adequate time for the discussion of key issues.
- Encourage dialogue between the company, its shareholders and other stakeholders and facilitate the Board's understanding of shareholders' and other stakeholders' concerns.
- Oversee the induction, information and support provided to directors.
- Lead the annual performance evaluation of the Board and its Committees.
- Determine the items of the agenda (including items that may have been recommended by the Vice Chairman or any other BoD member), schedule meetings in a way that ensures that the majority of BoD Members are present and send Members the necessary material to assist debate and decision-making in due time.
- Ensure that the BoD complies with its obligations towards its shareholders, the Company, the supervisory authorities, the law and the Company's Articles of Association.
- Represent and bind the Company where a resolution of the BoD is issued

CHIEF EXECUTIVE OFFICER

The CEO is vested with all powers necessary to act in all circumstances on behalf of the Company. He exercises these powers within the limits of the corporate purpose, in accordance with the rules set forth by the law and the Company's Articles of Association, and subject to the relevant resolutions of the Shareholder Assembly and the BoD.

The CEO is also in charge of all Company departments, directs their work, makes the necessary decisions within the context of the legal and regulatory framework governing the Company's operations, the Articles of Association, the approved projects and budgets, Board decisions as well as the Business and Strategic Plan.

The CEO's competences indicatively include:

- Supervise company business and financial policy.
- Monitor and assume responsibility for the Company's financial results and profitability.
- Monitor internal organization and take appropriate measures to promote and utilize human resources and proposes that the BoD approves the drafting of new regulations and organizational charts.
- Approve employee recruitment, as appropriate.
- Define the company's strategic targets, in cooperation with the BoD and the Executive Management.
- Set targets and KPIs and monitor the Management's performance.
- Delegate the day-to-day management of the company's business to each of the Executive Committee's Officers, acting individually, jointly or as sub-committee.
- Acquire and dispose businesses and approve unbudgeted capital expenditure projects, subject to a limit per transaction defined by the BoD in each case.
- Represent and bind the company against third parties for signing payment orders, bank checks, payment of salaries, insurance contributions and payment of taxes and fees of any nature to the State.
- Represent the company judicially and extrajudicially and sign every document from or addressed to the company, instruct advisers and instigate legal proceedings on behalf of the company in respect of matters for which no further collective Board authority is required by the law or the Articles of Association.
- Oversee the company's day-to-day operations and supervise each Unit's performance on its tasks.

NON-EXECUTIVE MEMBERS

Non-Executive BoD Members do not perform executive or managerial duties, but they contribute and help the BoD with the following indicative competences:

- Constructively challenge and help to develop strategy proposals.
- When necessary, submit reports individually or jointly to the Shareholders' Assembly Meetings, separately from the BoD reports.
- Following their appointment, participate in BoD Committees or any other working group or ad-hoc committees formed and perform the duties assigned to them
- Provide international and operational experience and knowledge and understanding of global financial issues for the sectors in which OPAP operates and their corresponding challenges.
- Manage conflicts of interest.

D. CORPORATE GOVERNANCE

D.3 Members and Relevant Experience

D.3.1. Meet our Board

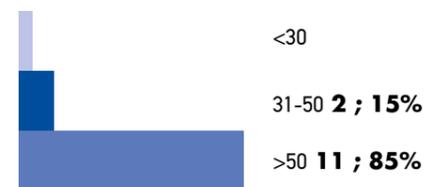
We are proud to have a Board of Directors whose members have strong academic and professional backgrounds and diverse skillsets. The majority of our board members have had numerous years of international experience in commercial and investment banking.

Also, the majority of our members have held high ranking positions in gaming and betting companies and therefore possess extensive knowledge on the gaming and betting market, helping OPAP to deliver key strategic decisions to become a world class gaming entertainment company.

Gender Distribution
(number of BoD Members ; percentage)



Age Distribution
(number of BoD Members ; percentage)



Member Dependence
(number of BoD Members ; percentage)



Experience in Gaming Industry
(number of BoD Members ; percentage)



Member Nationalities



Kamil Ziegler
CHAIRMAN OF THE BOARD

Mr. Kamil Ziegler is the Executive Chairman of OPAP S.A.

In 1984 Mr. Ziegler graduated from the University of Economics, Faculty of Trade, in Prague. In 1996 he graduated from the Southern Graduate School of Banking at the Southern Methodist University in Dallas, Texas. He began his professional career at the State Bank of Czechoslovakia where he served in different managerial positions: he worked as an Executive Director for Finance at Komerční banka, Prague, and then as a deputy CEO and Board member at Czech Savings Bank.

Thereafter, he was appointed Chairman of the Board and CEO in the Czech state-owned Consolidation Bank. After that he served as Chairman of the Board and CEO in Raiffeisenbank Czech Republic. He also held the position of Executive Director for Finance and Board Member in the PPF Group. His last executive appointment was as the CEO and proxy holder in SAZKA A.S., the largest Czech lottery organisation, where he is currently serving as a Board member.

Mr. Ziegler has been a member of the Board of Directors and member of Supervisory Boards of many companies in the Czech Republic, Netherlands and Cyprus.



Damian Cope
CHIEF EXECUTIVE OFFICER

Mr. Damian Cope was appointed Chief Executive and an Executive Board Member of OPAP S.A. with effect from July 2016.

Mr. Cope has a law degree from Bristol University, England and over twenty years' experience in the gaming industry having held a number of senior roles across both retail and digital operations. Prior to joining OPAP Mr. Cope was Managing Director, International and Group Strategy Director of the leading UK bookmaker Ladbrokes Plc (now part of GVC Group). At Ladbrokes Mr. Cope had responsibility for all non-UK, betting and gaming activities, across both retail and digital channels. This included regulated businesses in Spain, Belgium, Denmark, Ireland and Australia.

Mr. Cope was also a Board Director of Sportium Apuestas Deportivas, the Spanish sports betting JV with Cirsa Group. Previously Mr. Cope was Group Chief Information Officer and Managing Director, Ecommerce for the Gala Coral Group, the leading UK operator of betting, bingo and casino activities. He also held senior management positions at Rank Group Plc and Blue Square.





Spyridon Fokas
A' VICE-CHAIRMAN

In 1977 Mr. Spyridon Fokas graduated from the Law School of the National and Kapodistrian University of Athens, whilst during 1977-1978 he undertook post-graduate studies in shipping law at the University College London.

As an Attorney-At-Law Mr. Fokas has been a member of the Piraeus Bar Association since 1980 and practices law specializing in the sectors of maritime and corporate law. He is also a member of the Hellenic Maritime Law Association.

Mr. Fokas is a member of the Hellenic Union of Maritime Law, the Hellenic Association of Maritime Lawyers as well as the General Council of Hellenic Federation of Enterprises (SEV) and the Greek Jockey Club (FEE).



Pavel Šaroch
B' VICE-CHAIRMAN

Mr. Pavel Šaroch graduated from the University of Economics, Prague. Having specialized in investment banking and economic management of corporations since 1995, Mr. Šaroch has served in management positions with securities trading firms such as Ballmaier & Schultz CZ and Prague Securities. From 1999 to 2001, he was Member of the Board of Directors at I.F.B., which focuses on organizational and economic consultancy, management of private investment projects. In 2001, he was appointed Deputy Chairman of the Supervisory Board of ATLANTIK finanční trhy and subsequently became a member of the company's Board of Directors.

Mr. Šaroch is a member of the Boards of Directors of the parent company of KKCG investment group KKCG AG and of individual holding companies that belong to the Group. In KKCG a.s. he represents the position of the Chief Investment Officer.

Moreover, he is a member of the board of directors of SAZKA Group a.s. and its subsidiaries.



Pavel Mucha
CHIEF FINANCIAL OFFICER

Mr. Pavel Mucha has officially assumed his role as Chief Financial Officer at OPAP, on 1 October 2019.

He held the position of Chief Financial Officer in Czech company Sazka, the national lottery operation of Czech Republic, which is a member of SAZKA Group. In total, he has 26 years of professional experience, holding finance roles, in consultancy (Price Waterhouse), pharmaceutical (Wyeth Whitehal) and FMCG companies (Rothmans/BAT and Stock Spirits Group). With Sazka he has four years of professional experience in the gaming market.



Katarina Kohlmayer
MEMBER

Mrs. Kohlmayer had been a senior investment banker with experience in corporate finance, reporting and accounting, international M&A, equity and debt capital markets and bank financing transactions. Her previous professional roles include managing director's positions in London and Moscow, at Morgan Stanley and VTB Capital. As of 2014, she serves as Board Director and CFO at KKCG, one of the largest Czech-led private investment group, active in 4 main investment areas: lotteries and gaming, oil and gas and chemicals, technology and real estate.

During her professional career, she has specialized in M&A transactions and their financing in Central and Eastern European countries, Russia and CIS. Mrs. Kohlmayer is an alumna of the University of Economics in Bratislava as well as holds an MBA from Harvard University.



Robert Chvatal
MEMBER

Mr. Robert Chvatal graduated from Prague School of Economics where he studied Business Administration. Mr. Chvátal began his professional career in 1991 with Procter & Gamble and Benckiser before spending 15 years in mobile telecommunications as Chief Marketing Officer for T-Mobile Czech, and later as CEO of T-Mobile Slovakia and T-Mobile Austria.

Since 2013, he joined lottery sector by being appointed the CEO and a member of the BoD of Sazka a.s., which, following a turnaround, has become one of the fastest growing lottery companies globally.

In 2017 Mr. Chvátal was appointed as CEO of SAZKA Group, while since the same year he serves as an OPAP Board Director. Mr. Chvátal has also been elected since 2015 as the 1st Vice-President of the European Lotteries and Executive Committee member of Eurojackpot – pan European jackpot scheme.



Christos Kopelouzos
MEMBER

Mr. Christos Kopelouzos is currently the CEO of Copelouzos Group with business activities in the area of Natural Gas, Renewable Energy, Electricity Production and Trading, Real Estate, Concessions, Airports and Gaming.

Mr. Kopelouzos was born in Athens. In 2002, he completed his studies at the City University/City Business School in the field of Investment and Financial Risk Management.





Stylianos Kostopoulos
MEMBER

Mr. Stylianos Kostopoulos graduated from Aristotle University of Thessaloniki, Faculty of Positive Sciences, holding a Degree in Applied Mathematics. Since 1989, Mr. Kostopoulos has held numerous managerial positions in the Financial and Banking sector, mostly in BNP Paribas and Omega/Proton Bank, being responsible for Wealth Management, Corporate and Investment Banking, Credit Analysis, Loan Administration and Customer Services.

Since 2006, he has joined Aegean Oil, heading the Family Office of the Founders and being BOD member, CFO, Financial Advisor and Treasurer in various companies. In parallel, since 2013, he has served as Member of the BoD of EMMA DELTA VCIC and its affiliates.



Igor Rusek
MEMBER

Dr. Igor Rusek graduated from the Faculty of Law at the University of Basel, Switzerland, where he undertook post-graduate studies in international private law. He has served for many years as a member of Boards of Directors of various international groups of companies and has managed for two decades in this capacity the organization of internal audits, accounting standards and corporate governance under applicable international standards. From 1994 to 2001, he was Associate Attorney at ATAG Ernst & Young, auditing and consulting firm in Basel. In 2001 he was appointed Partner and Member of Executive Committee at ATAG Private and Corporate Services Ltd (ATAG PCS).

During his role as CEO of ATAG PCS from 2007 – 2018, Dr. Rusek also had the Chair of the Compliance Audit Team and was mainly responsible for Audit and Tax Audit Procedures in companies which are administrated by ATAG PCS, as well as their Corporate Governance. While continuing his responsibilities for ATAG PCS's Audit and Tax Procedures, Dr. Rusek is also currently the President of the Board of Directors and partner of ATAG Attorneys Ltd, a law firm which roots reach back to 1917 founded ATAG, a leading Swiss advisory company.



Dimitrakis Potamitis
MEMBER

Mr. Dimitrakis Potamitis graduated from the Athens University of Economics and Business (former ASOEE). Mr. Potamitis' professional career began in 1968, as a junior auditor at PricewaterhouseCoopers International Limited (PwC). His main expertise was shipping and banking audits. Since 1982 and up until 2004, Mr. Potamitis was a PwC Partner in charge of Piraeus Office-Greece, while from 2004 up to 2008 he acted as a Consultant. From 2008 and up until today he is an Independent, Non-Executive Board Member of Aegean Baltic Bank S.A. and Chairman of the Audit Committee, as well as Member of the Remuneration Committee (from 2012) of the aforementioned bank.

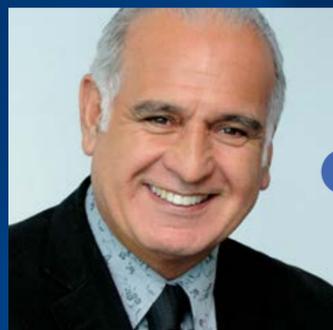
Mr. Potamitis has also provided specialist consultancy and advisory services in matters related to the audit of the Financial Statements of companies in the shipping industry. He is a Member of the Hellenic Institute of Public Accountants – Auditors.

In 2017, Mr. Potamitis was appointed as Chairman of the Audit Committee in Resolute Asset Management S.A., a specialist real estate asset management and non-performing loan servicing firm. Furthermore in 2018 Mr. Potamitis was appointed as a member of the Quality Review Council of Hellenic Accounting and Auditing Standards Oversight Board (HAASOB/ELTE), acting as a quality reviewer of the financial statements of non-listed companies.



Nikolaos Iatrou
MEMBER

Mr. Nikolaos Iatrou has completed his studies in Management and Organizational Behavior and has extensive experience in financial services. In 1991 he co-founded Hellenic Securities S.A. that 11 years later was acquired by Marfin S.A. Up until 2005 he was holding the positions of Chairman and Managing Director of Marfin Hellenic Securities S.A. as well as several other managerial positions within MARFIN BANK. In 2007 he founded SILK Capital Partners, a boutique Corporate Finance firm, mainly active in debt restructuring as well as in M&A and business development. Since 2015 he is BoD member and was also a member of the investment committee of NBG PANGEA REIC. He is a member of the Hellenic Olympic Committee and Mentor in ENDEAVOR Greece.



Rudolf Juncik
MEMBER

Mr. Rudolf Juncik studied Ancient and Oriental Languages as well as History at Charles IV University in Prague. Mr. Juncik is currently the Owner and Executive Director of the Prestige Oblige, Private Management and Consultants FZ LLC in Dubai. Previously, he served as the CEO of MAF Hospitality (Property) in Dubai and as President of the Oberoi International Group in New Delhi. He has also worked as a Special Advisor to the CEO of Air France Group in Paris and as Managing Director of Forte/Meridien Hotels in Paris.

Additionally, Mr. Juncik has served as a Senior Vice President of Meridien, based in Athens. He has also worked as a French foreign trade Advisor and as a COO of the Casino Royal Evian in France.



Executive Member
 Non Executive Member
 Independent Non Executive Member
 Member of the Audit Committee
 Member of the Remuneration and Nomination Committee

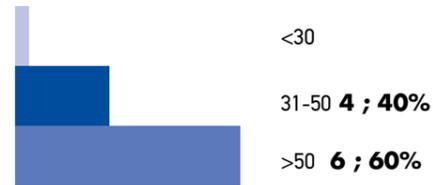
D.3.2. Meet our Executive Committee

Our Executive Committee, as of 31.12.2019, consisted of senior executives and members of the board. The committee is responsible for providing organizational oversight to OPAP's main operations, participates in the company's strategic planning and advises the board on relevant business matters.

Gender Distribution
(number of Executive Committee Members ; percentage)



Age Distribution
(number of Executive Committee Members ; percentage)



Member Nationalities



A strong mix of Greek and International players



Damian Cope
CHIEF EXECUTIVE OFFICER

Damian was appointed Chief Executive and an Executive Board Member of OPAP SA with effect from July 2016. Damian has almost twenty years' experience in the gaming industry having held a number of senior roles internationally, across both retail and digital operations.



Odysseas Christoforou
DEPUTY CEO

Odysseas has held management positions at Arthur Andersen and Ernst & Young South East Europe, while later he served as General Manager of Communication at Emporiki Bank and Bank of Cyprus. From 2008 to 2014 he served as Senior Executive to the Governor of the Bank of Greece. Since 2014 he is Chief Corporate Affairs Officer at OPAP. In June 2019, he was officially granted the new role of Deputy CEO in effect as of 1st July 2019.



Nancy Verra
CHIEF REGULATORY AND COMPLIANCE OFFICER

Nancy is the Chief Regulatory and Compliance Officer of OPAP Group and joined OPAP in 2015. She is a member of the Athens Bar Association since 2000 and litigates in Supreme Court and Council of State. Nancy has more than 20 years professional experience in positions with high legal responsibility in companies listed in ATHEX, having handled successfully top litigation, legal and regulatory cases. She has also served as a BoD member in ERGOSE S.A. and in National Regulatory Authority for Railways.



Pavel Mucha
CHIEF FINANCIAL OFFICER

Pavel officially assumed his role as Chief Financial Officer at OPAP, on 1 October 2019. He held the position of Chief Financial Officer in Czech company Sazka, the national lottery operation of Czech Republic, which is a member of SAZKA Group. In total, he has 26 years of professional experience, holding finance roles, in consultancy (Price Waterhouse), pharmaceutical (Wyeth Whitehal) and FMCG companies (Rothmans/BAT and Stock Spirits Group). With Sazka he has four years of professional experience in the gaming market.



Spyros Linaras
CHIEF PEOPLE OFFICER

Spyros joined the OPAP family as Chief People Officer in February 2020. He is a senior Human Resources professional with 25+ years of experience in multinational FMCG groups across Europe, US, Asia, and Greece. Previously, he was leading the HR function for Arla Foods Germany, a division of the large European food business Arla Foods Group, which has around 19,000 employees. Prior to that he worked for almost twenty years in a variety of HR roles at PepsiCo, and before that he started his career with Procter & Gamble.



Michele Fusella
CHIEF TECHNOLOGY OFFICER

Michele started his career in the gambling industry in 2000, joining Coral-Eurobet, while later he held director IT positions in Gala Coral Group, Ladbrokes Plc and Sportium Apuestas Deportivas. He joined OPAP in August 2016.



Jan Karas
CHIEF COMMERCIAL OFFICER

Jan joined OPAP in 2014 to lead the development and operation of OPAP stores channel and Indirect Sales channels. Previously he held several senior executive positions in Marketing, Sales and Product development in the Telecommunications sector.



Petr Matejovsky
CHIEF ONLINE OFFICER

Petr joined OPAP in 2013 as CMO, and is currently serving the role of CCO, previously he held different positions in Telefónica Czech Republic. Petr is an experienced marketing professional with an extensive record of achievements, having experience in the management of key cross-company and transformation projects.



Vaios Karantinos
CHIEF RETAIL OFFICER

Vaios has been with OPAP since 2014, and currently leads the VLTs roll-out as Chief Operating Officer – Gaming Halls. He started his career in Sales by holding executive roles at WIND Hellas for 17 years, where he quickly became a member of the management team.

D.4 Audit Committee Report

Overview

The Audit Committee was originally appointed by the General Meeting of Shareholders of OPAP S.A., in October 2013, while the term of office of the current Audit Committee initiated on 25.04.2018 following its election by the General Meeting of shareholders.

As an independent body, the Audit Committee is able to oversee the affairs of OPAP S.A. ethically and with responsibility. This duty is its main role at present and in the future. The activities undertaken by the Committee include activities in different fields such as review of the financial information subject to regulation, control of market risks, oversight of management model, monitoring the independence of the statutory auditor and appraising the business of the Internal Audit division.

Members and their Roles

The Audit Committee consists of three independent and non-executive members. The Members of the Audit Committee were elected for a term of four years, with decision taken by the Shareholders in April 2018, in the context of the Annual General Assembly.

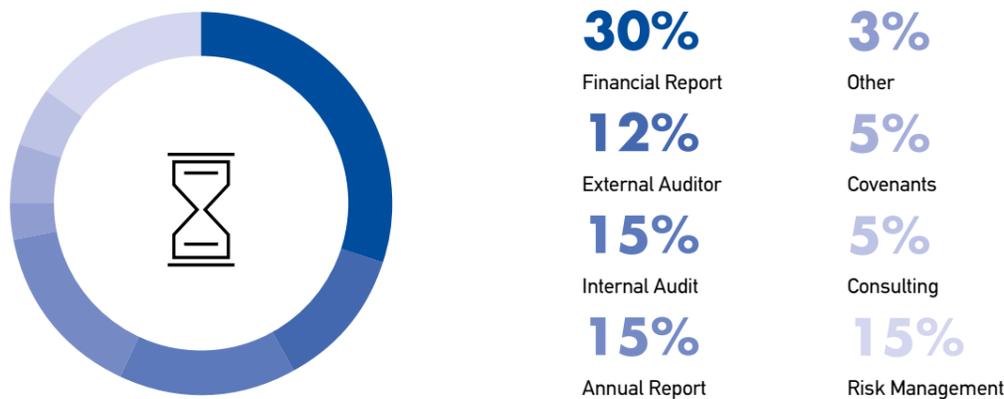
The Audit Committee consists of three non-executive members and held 8 meetings in 2019.

Board Member Name	Position	Attendance
Dimitrakis Potamitis	Chairman	8
Igor Rusek	Member	8
Rudolf Jurcik	Member	8

Audit Committee Meetings

The Audit Committee met 8 times in 2019 at the premises of the Company.

Time spent by the Audit Committee



Major Duties of the Audit Committee

- Monitor the drafting of the financial statements and report on the annual, half-yearly and quarterly financial statements.
- Inform the Board of Directors of the audited entity about the outcome of the statutory audit and explain how the statutory audit contributed to the integrity of the financial information and what was the role of the audit committee in that process.
- Monitor the financial reporting process and make recommendations or proposals to ensure its integrity.
- Report to the Board of Directors any change in accounting policies balance sheet risk and off-balance sheet risk.
- Propose the appointment of statutory auditors to the Board of Directors, for subsequent referral to the General Meeting of Shareholders.
- Grant pre-approval for the provision of non-auditing services by the statutory auditor's audit company to the Company and subsidiaries of the Group, and the respective fees.
- Oversee internal audit services, ensure the quality and risk management of the Company and, where applicable, its internal audit unit, with regard to the financial information of the audited entity without infringing the independence of that entity. Also, the Audit Committee shall report on the process of selection, appointment, reappointment, removal and remuneration of the Internal Audit Head and on Internal Audit division budget.
- Be fully aware of the financial information reporting process and internal audit systems.
- Review and monitor the independence of statutory auditors or audit firms.
- Oversee the selection process of statutory auditors or audit firms.
- Liaise with the external auditors so as to receive information on any matters that could jeopardize the latter independence and any other matters relating to the financial auditing process.

Audit Committee 2019 Activities

- Reviewing the integrity of the Company's Annual Report, semi-annually and quarterly financial reporting.
- Reviewing the effectiveness and performance of our external auditors assessing their independence and recommending their appointment.
- Reviewing the risks anticipated by the company and mitigation actions taken by the company.
- Reviewing the Operational Incidents Investigation reports.
- Discussing on Reputation risks.
- Reviewing the Committee's terms of reference.
- Reviewing AML report.
- Reviewing reports from Legal team regarding claims against and in favor of the Company.
- Discussing on new laws and related Government issues.
- Reviewing subsidiaries results and financial positions.
- Meeting with Chairman, CEO, Internal Audit Director, External auditors, Legal and other senior members.
- Reviewing external and internal reports on IT security risks and controls and Third party controls in Data Centers.
- Discussing on Good will – impairment.
- Reviewing internal audit reports on Related party transactions, Revenue recognition
- Reviewing trade receivables for bad debts.

Conclusion

Based on our review we believe that the organization OPAP S.A has reasonable systems of internal and risk management controls as well as an effective system for ensuring compliance with laws and regulations, code of conducts/Ethic and whistleblowing.

The Committee has been supported by key personnel /departments, particularly by the Internal Audit department, which adds value to the Organization.

Dimitris J. Potamitis,
Audit Committee Chairman

D. CORPORATE GOVERNANCE

D.5 Remuneration and Nomination Committee Report

Overview

The Remuneration and Nomination Committee, as it was renamed by the 26.05.2016 Board of Directors' decision, is responsible for deciding on the fees that encourage good customer service, are fair to all our employees and are aligned with the interests of all of our shareholders.

Members and their Roles

The Remuneration and Nomination Committee consists of three non-executive members and held 6 meetings in 2019.

Board Member Name	Position	Attendance
Pavel Šaroch	Chairman	6
Spyridon Fokas	Member	6
Pavel Horak*	Member	5
Robert Chvátal*	Member	-

*Mr. Robert Chvátal, on 27.11.2019, by decision of the Board of Directors, was appointed as Member of the Remuneration and Nomination Committee in replacement of the resigned Mr. Pavel Horak.

Major Duties of the Remuneration and Nomination Committee

The primary objective of the Remuneration and Nomination Committee is to assist the Board of Directors in carrying out its duties in the following areas:

- Ensure that there are adequate procedures for the evaluation of the Chairman's, non-executive Board Members', executive Board Members' remuneration, as well as Board and Board Committees remuneration.
- Ensure that the Company adopts, monitors and implements appropriate policies and remuneration procedures.
- Ensure that disclosures regarding remunerations meet the disclosure objectives of the Board of Directors and of all relevant legal requirements.
- Review the Board's executive members' and executive officers' succession plans on a regular basis to maintain an appropriate balance of skills, experience, expertise and diversity in the management of the Company, providing advice to the Board accordingly.
- Evaluate candidates and propose new members for the Board of Directors.

Remuneration Regime

Bonus schemes were adopted that build incentives via specific KPIs. Established criteria include quantitative benchmarking based on the overall Company performance, taking into account key profitability metrics. Qualitative criteria also apply, focusing on managerial skills, training and development of the working teams, project deliveries, external communication etc.

Bonuses and other variable remuneration arrangements are common practice for companies listed in the FTSE100 index. Research has shown that 99% of executives working in the FTSE100 companies at the Executive Committee level and above have a ratio of variable to fixed remuneration in excess of 1:1. At OPAP, this ratio of variable to fixed remuneration is only applicable to the Chairman of the Board and the Chief Executive Officer.

The Remuneration Policy of the company applies to the remuneration of all Board members. It is designed to reflect fair payment conditions for all employees and align the Board's remuneration with the interests of our shareholders. The objective of the Remuneration Policy is therefore to meet market practice, to serve the Company's strategic vision, its shareholders, clients and wider stakeholders.

The Remuneration Policy was approved by the Shareholders of the Company at the 2019 Annual General Meeting.

The Company, in compliance with its legal obligations, will submit the Remuneration Report of 2019 for discussion at the Annual Ordinary General Meeting of 2020, ensuring that the Report is prepared and published in accordance with the requirements of the applicable law. In particular, the Remuneration and Nomination Committee prepares a clear and comprehensible remuneration report, which contains a comprehensive overview of remuneration for the last financial year, with the minimum content specified by Law 4548/2018. The remuneration report for the last financial year is submitted to the regular General Assembly for discussion as a separate item on the agenda. The shareholders' vote on the remuneration report is advisory. The Board of Directors should explain in the next remuneration report how the above result of the vote was taken into account at the regular General Assembly.

Long-term Incentive Scheme

The Board of Directors of the Company, following a recommendation of the Remuneration and Nomination Committee, on 28.3.2017, approved a Long-term incentive scheme with distribution of part of the Company's net profits to Executive Members of the BoD and other Key Management Personnel of the Company, excluding the CEO.

The program's duration is 3 years, for 2017-2019. The targets relate to a) the profitability of the Company for the 3-year period mentioned above and b) the Company's share price increase in Athens Exchange. Finally, the scheme defines that the maximum amount to be distributed to up to 30 beneficiaries is € 7,000,000.

Any decision about a potential program for 2020-2022 has yet to be made.

Conclusion

We hope that the remuneration report will ensure sufficient transparency of the remuneration of the BoD members and the relevant policies that form it. This framework seeks to create long-term corporate value by confirming that the incentive structure strikes a balance between the long-term and short-term performance of Board members as well as promoting meritocracy, so that the Company attracts talents, which will effectively manage it.

Pavel Šaroch,
Chairman of the Remuneration Committee

D. CORPORATE GOVERNANCE

D.6 Executive Committees

We have established a number of executive committees that report, consult and advise our BoD on various business matters and support the effective operation of the company.

OPAP Agencies type A' and F' Committee

In 2018, the "Agencies Committee" was renamed as "OPAP Agencies type A' and F' Committee". The Committee, having an advisory and consultative role to the company's Board of Directors, is responsible for evaluating issues related to OPAP agencies, with (type F) and without (type A) VLTs.

Opinion giving duties of the committee involve the termination of agency contracts, spatial planning for new agencies, provision of additional agencies to existing agents, introduction of new partners into the agencies' network or any other relevant issue that the Committee considers pertinent for the BoD to decide.

Furthermore, the Committee has executive powers regarding relocations, expansions, transfers, consensual termination of agencies' contracts and the support of the infrastructure upgrade of agencies.

OPAP Agencies type A' and F' Committee composition

Position	Role
Executive Member of BoD	Chairman
Chief Operating Officer - Retail	Vice-Chairman
OPAP Stores Retail Team Director	Member
Sales Operations Team Director	Member
Retail Support Team Head	Member
Regulatory and Compliance Team Director	Member
Lawyer from Regulatory and Compliance Team	Member

OPAP Agencies type B' Committee

In 2018, "OPAP Agencies type B' Committee" was established. The Committee, having an advisory and consultative role to the company's Board of Directors, is responsible for evaluating issues related to OPAP PLAY stores. Consultative duties of the committee involve the termination of agency contracts, spatial planning for new agencies, provision of additional agencies to existing agents, introduction of new partners into the agencies' network and relocations.

Furthermore, it has executive powers regarding transfers, expansions, sublease of property, refurbishment of agencies, approvals for the provision of health-regulated or other services at an agency, consensual termination of the agency's contract and the support of agencies' infrastructure upgrade.

OPAP Agencies type B' Committee composition

Position	Role
Executive Member of BoD	Chairman
Chief Operating Officer - PLAY games	Vice-Chairman
Gaming Halls Sales Team Director	Member
Gaming Halls Operations Team Director	Member
Partners' Support Supervisor	Member
Regulatory and Compliance Team Director	Member
Lawyer from Regulatory and Compliance Team	Member

OPAP Agencies Compliance Committee

In 2018, the OPAP Agencies Compliance Committee was established, in order to assure the transparent implementation of the network's compliance monitoring process. OPAP network's compliance is a strategic priority for the OPAP Group. The Compliance Committee has an advisory and consulting role to the company's Board of Directors. More specifically, it has an advisory authority on matters such as the imposition of penalties and fines for agencies above a certain financial threshold, the termination of agency agreements and other relevant issues the Committee considers pertinent for the BoD to decide.

Furthermore, the Committee has executive powers on compliance matters, such as the issuing of written warnings and imposition of fines, the submission of proposals to the BoD for the imposition of severe sanctions, the management of non-compliant agencies, and the implementation of the compliance monitoring process.

OPAP Agencies Compliance Committee composition

Position	Role
Chief Corporate and Regulatory Affairs Officer	Chairman A
Chief Operating Officer - Retail A	Vice-Chairman
Chief Operating Officer - PLAY Games B	Vice-Chairman
Regulatory and Compliance Director	Member
Retail Excellence Team Director	Member
OPAP Stores Team Director	Member
Gaming Halls Sales Team Director	Member
Responsible Gaming Team Director	Member
Security and Risk Management Team Director	Member
Anti-Money Laundering Officer	Member
Network Regulatory and Compliance Manager	Member

OPAP Information Security Committee

In 2019, a new Committee was formed regarding the Information Security of the Group. The responsibilities of the Information Security Committee (ISC) are described as follows:

- Monitor and review the Information Security Management System (ISMS) to ensure its continuing suitability, adequacy and effectiveness.
- Review major security incidents and, where appropriate, recommend strategic improvements to address any underlying root causes.
- Identify significant trends and changes to information security risks.

Members of this Committee are the following:

OPAP Agencies Compliance Committee composition

Position	Role
Chief Executive Officer	Chairman
Deputy Chief Executive Officer	Member
Information Security Officer	Member
Chief Financial Officer	Member
Chief Technology Officer	Member
Group Audit Director	Member
IT Security Officer	Member
Data Privacy Officer	Member

Management Systems Committees

The Management Systems Committees, namely the Quality Management Committee and the Environment, Energy and Health and Safety Committee, are responsible for overseeing all activities related to our management systems and:

- Establish and substantiate OPAP's corporate policies relevant to the management systems.

- Decide on any corrective and preventive actions.

- Recommend improvement actions to the BoD.

- Secure adequate resources (materials and services).

OPAP Management Systems Committees composition

Position	Role	Quality Management Committee	Environment, Energy and Health and Safety Committee
Executive Member of BoD	Chairman / Top Management representative on Management Systems	☑	☑
Operational Finance Director	Member / Management Systems Representative	☑	☑
Quality Management Systems Team Manager	Member	☑	☑
Total Rewards and Employee Relations Team Director	Member	☑	☑
Facilities Management Team Director	Member	☑	☑
Learning and Development Team Director	Member	☑	☑
Infrastructure and Operations Team Director	Member	☑	
Customer Intelligent and CRM Team Director	Member	☑	
Contact Center Team Head	Member	☑	
Security & Risk Management Team Director	Member		☑
CSR & Public Relation Team Director	Member		☑
Regulatory & Compliance Team Director	Member	☑	☑
Applications Team Director	Member	☑	
Gaming Team Director	Member	☑	
Play Games Product & Vendors Team Director	Member	☑	
Sports Team Director	Member	☑	
Retail Support Team Director	Member	☑	

D.7 Corporate Responsibility Management

OPAP adopts a holistic approach to corporate responsibility, where the accountability for responsible operation lies within each department and each employee.

To assure the holistic and responsible management of our operational issues, we have established the appropriate organizational structures, as follows.

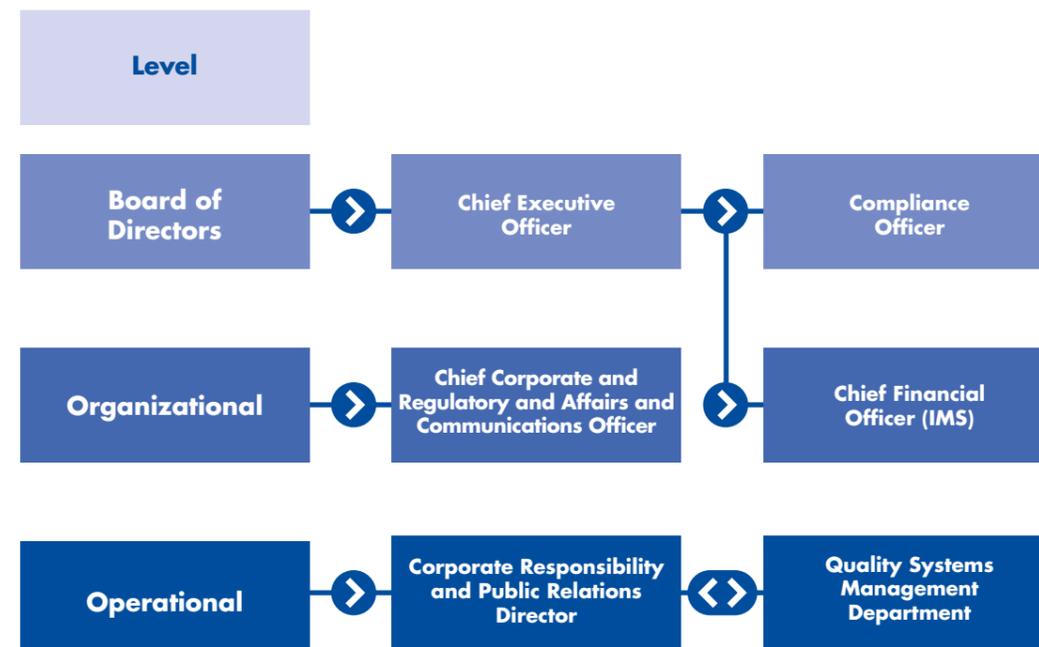
At the Board level, our corporate responsibility agenda is driven by the Chief Executive Officer. The Board oversees OPAP's performance and strategy on various areas of our sustainability strategy, such as internal operation, people development and network enhancement issues that could have an effect on the overall reputation and financial performance of the Company. The Board approves the larger social programs and initiatives and gets informed about OPAP's corporate responsibility performance.

At an organizational level, the Chief Corporate and Regulatory and Affairs and Communications Officer (who also serves as the Deputy CEO) is responsible for identifying the strategic risks, setting standards and targets and reviewing the performance regarding corporate responsibility.

At an operational level, the Corporate Responsibility and Public Relations Director is responsible for cooperating with other departments in order to diffuse responsibilities, policies and practices, and has established a close collaboration with the Quality Systems Management Team.

We have also appointed specific executives who are responsible for mitigating risks as well as defining and sustaining the strategies that reflect our corporate responsibility objective, by coordinating and implementing relevant programs and activities.

Corporate Responsibility Management





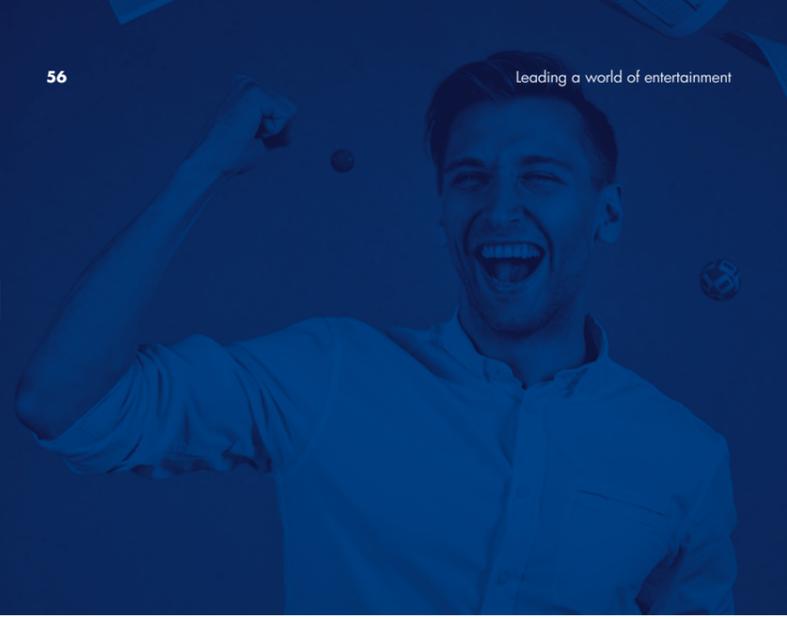
Company Value Creation

CHAPTER E **In this section**

1. Business Model
2. How we Create Value
3. Operating Responsibly
4. Risk Management
5. Stakeholder Engagement
6. Customer Satisfaction

E. COMPANY VALUE CREATION

E.1 Business Model



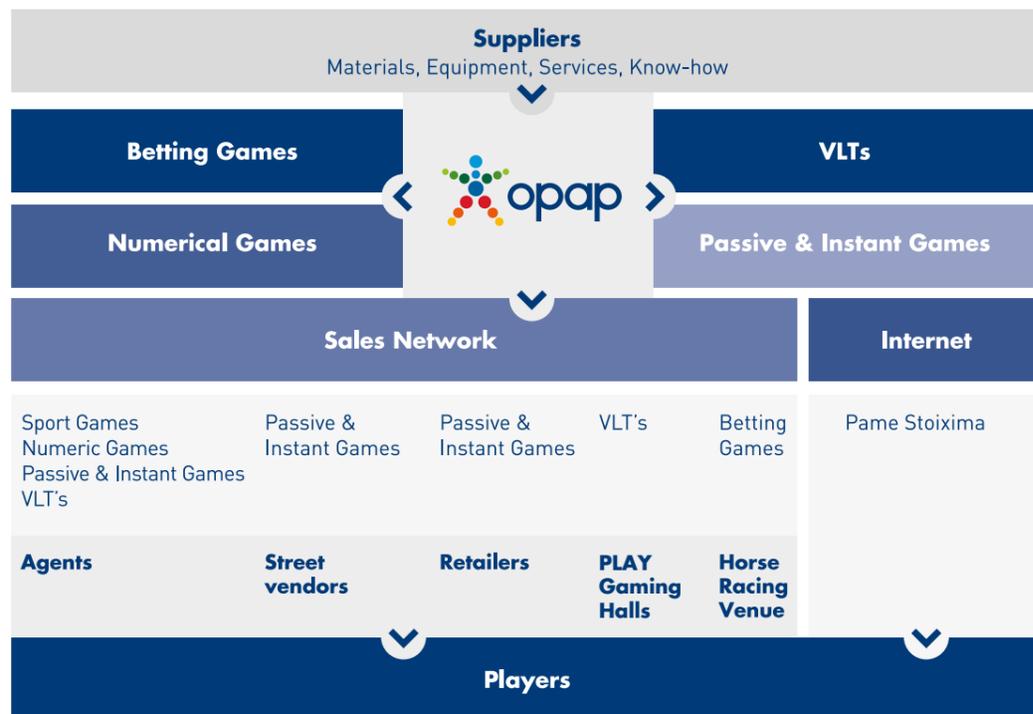
We offer numerical and betting games. Betting games have the final amount of winning revenues fixed and made known at the time of betting, while in numerical games, all bets of a particular type are collected and then the yield is calculated by distributing the concentrated bets to the winners.

To deliver our products and services, aside from our own operations, we utilize resources from our suppliers (materials, equipment, services and know-how), which are used to organize, operate and sustain our games of chance.

All our products and services are available through our sales network, which includes OPAP agencies (where we also provide the necessary equipment, IT systems and services such as training), street vendors and other various retailers (for selling SCRATCH tickets and passive lotteries) and PLAY Gaming Halls (for VLTs), as well as the Horseracing venue in Markopoulo.

Customers can also place their bets through specially designed online platforms, namely www.pamestoixima.gr for PAME STOIXIMA, our sports betting game, and through www.tzoker.gr for TZOKER, our numeric game.

Our Operations



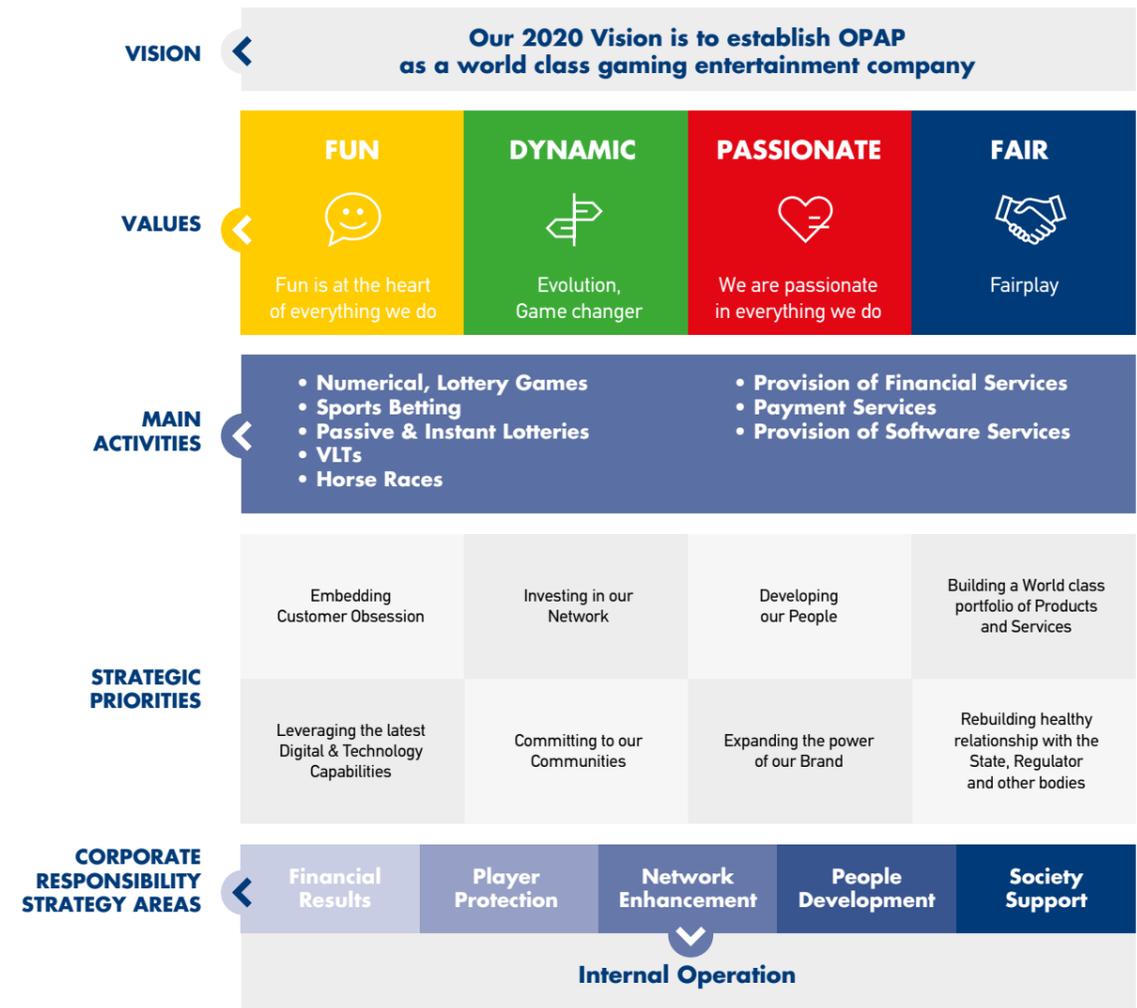
E.1.1. Our Business Model

Our business model lays out the key decision-making foundations that govern our actions and initiatives in order to achieve our business goals, deliver top-quality products and services, foster employee training and development, maintain strong communication channels with our agents and suppliers and fulfill our corporate responsibility mandate.

Our vision is to establish OPAP as a world class gaming entertainment company and ensure the company's growth, expansion of operations and profit generation. The implementation of the 2020 Vision is supported by our 4 core values (Fun, Dynamic, Passionate and Fair). These values form the basis for developing a modern working environment and motivating our employees throughout the Group.

We have established a set of 8 strategic priorities that will help us generate, capture and sustain value for the company and all our stakeholders, both in the short and in the long term, and at the same time safeguard OPAP's future success. Along with its 8 strategic priorities, OPAP is further focusing on certain initiatives centered around 5 essential pillars (see section E.1.3 Our Strategy).

We operate under the World Lottery Association (WLA) and responsible gaming standards and strive to transform our business excellence into social contribution through an integrated corporate responsibility strategy, as visualized in the model presented below.



E.1.2. Our Values

Fun

“Fun is at the heart of everything we do”

Every day, we create together opportunities to play, win, reward, celebrate and offer a unique entertaining experience to our customers. We combine pleasure and performance across our business while we encourage a healthy work and life balance.

Dynamic

“Evolution, Game changer”

We strive to excel, continuously re-invent ourselves and facilitate the growth of the gaming entertainment industry. As pioneers, we always seek to, innovative, inspire and offer a world-class experience to our customers.

Passionate

“We are passionate in everything we do”

We work together as one team to deliver our common purpose of creating value for our stakeholders. We are customer-focused, operating with a bold and decisive attitude in providing the ultimate gaming experience and inspiring each other to achieve the best of ourselves.

Fair

“Fairplay”

Our working environment is inclusive and of equal opportunities. We operate with respect and integrity, cultivate an open transparent environment and solidify our position as a leading and trusted group of companies.



E.1.3. Our Strategy

Guided by our 2020 Vision to establish OPAP as a world-class gaming entertainment company, we have established our strategic framework, which is driven by 8 strategic priorities.

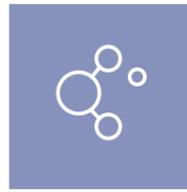


Embedding customer obsession

OPAP is a consumer-facing business serving millions of customers. The customer is at the center of everything we do. So, we intensify our actions to better understand our customer, increase our internal focus and continuously respond to changing customer behavior.

Investing in our network

Our network consists the basis of our business activities. OPAP aims to develop its agencies to be the customer's local entertainment destination through significant investments in the agencies themselves, introducing a number of products and services. The Company also places emphasis on the alignment of its interests with those of its agents and on the increase of the level of support that is provided to them.



Developing our people

Our people are one of the key assets of the Company. OPAP aims to build high-performing teams, while attracting new talent to the Group, further developing the existing people through the expanded OPAP Academy program and creating stronger bonds between the Company and its people through a number of initiatives, including more regular two-way internal communications.

Building a world class portfolio of products and services

Our aim is to offer a broad range of attractive, new and improved products and services for our customers and our network, researching ideas from around the global gaming world.



Leveraging the latest digital and technology capabilities

The transformation of the role of Digital & Technology within the Group consists one of our key objectives. We continue to invest in modern solutions, which will provide an improved level of control and flexibility to the ongoing delivery and improvement of OPAP's products for the customers, setting at the same time the basis for future strategy.

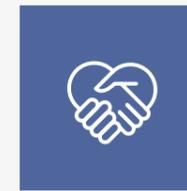


Expanding the power of our brand

The OPAP brand has a remarkable level of recognition both in Greece and Cyprus consisting one of our most important assets. By re-establishing our brand's identity and making the most of our powerful "anthropaki" logo, the Company can further extend the reach and impact of its brand, as well as strengthen its dedication to maintain a strong and consistent emotional connection with its customers.

Enhancing healthy relationships with the state, regulator and other bodies

OPAP strives for an ongoing and effective cooperation with the Regulator and other significant public bodies at local and international level, maintaining an open dialogue and establishing a better mutual understanding for items of common interest.



Committing to our communities

OPAP understands that it has an important role within the communities in which it operates both in Greece and Cyprus, targeting the creation of long-term, meaningful benefit so as the Company contributes to building a brighter future. OPAP displays strong commitment for health, sports and employment. In addition, OPAP focuses on stakeholders' engagement. The Company adopts and develops the highest standards of integrity and responsibility which are part of an integrated Responsible Gaming strategy.

Benefiting from the foundations that have been set in the previous two years, in 2020 and beyond, along with its 8 strategic priorities OPAP is further focusing on certain initiatives within the following 5 pillars:

- **Entertainment**

The OPAP team is working on offering ever-improving customer entertainment aiming to cement OPAP's position as a true entertainment brand. At the core of this initiative is the offering of more engaging products and content, the continuation of REX 2020 in order to create an outstanding customer experience, as well as the Company's brand further development into an entertainment brand.

- **Online**

We focus on accelerating online customer engagement and additional revenue generation through changing the game online, offering a superior digital experience and accelerating delivery capabilities.

- **New ventures**

We aim to develop and introduce additional new services complementing gaming and attracting new customers by finalizing the implementation of projects mainly related to TORA DIRECT S.A. and TORA WALLET S.A., by fully leveraging the OPAP network.

- **Information**

This pillar involves building registered customer databases and maximizing value by data analysis and insight-generation.

- **High Performance**

We are seeking further improvements both internally and across the various operating channels by further improving our network operations, enhancing the way we work internally and digitalizing our operations.

E.1.4. Our Corporate Sustainability Strategy

Our corporate sustainability comprises of 6 key focus areas. These focus areas reflect our mandate to achieve financial prosperity and create value for both society and the environment.

Internal Operation

We aim to operate in a responsible manner by embedding responsibility into our business, and at the same time, improve our competitiveness and create value for all our stakeholders.

See sections [D. Corporate Governance](#) and [E. Company Value Creation](#)

Financial Results

We seek to align our continuous support to society with healthy financial results, in order to facilitate a sustainable business. Therefore, we built our long-term corporate strategy in a transparent way that satisfies the needs of shareholders and the investment community, creates value for all stakeholder groups, contributes to the country's development and economic sustainability, while at the same time strengthens our presence in the gaming industry.

See section [F.1 Achieving Financial Results](#)

Player Protection

We understand that the responsible management of our business is imperative, due to the possible risks and consequences that might arise from excessive participation in games of chance. Therefore, we seek to establish an environment, in which a fair, reliable and safe gaming experience is provided to those who choose to use the products and services offered by our Company, for their own entertainment.

See section [F.2 Protecting our Players](#)

Network Enhancement

Recognizing that we operate in a highly challenging economic situation, we dedicate our efforts to the development of our sales network and the creation of more jobs. Our aim is to place our customers at the top of our priorities and provide the resources to improve our network partners' operations at every level.

See section [F.3 Enhancing our Network](#)

People Development

Our People are at the heart of everything we do, bringing value and contributing to the achievement of our long-term strategic objectives, which lead us towards our 2020 Vision. We are committed to creating a unique experience for all OPAP People; one that reflects our high performing culture and values. We focus on being a great place to work by placing our People at the center of our strategy.

See section [F.4 Developing our People](#)

Society Support

Social contribution transcends our business activities and we have the responsibility to support social growth and prosperity. Thus, we are committed to supporting and generating benefits for various different stakeholders and underprivileged social groups, facilitating our supply chain's growth and responsible operation, as well as protecting the environment and reducing our potential impact on climate change and resource usage.

See section [F.5 Supporting our Society](#)

Acknowledgement of our sustainability performance



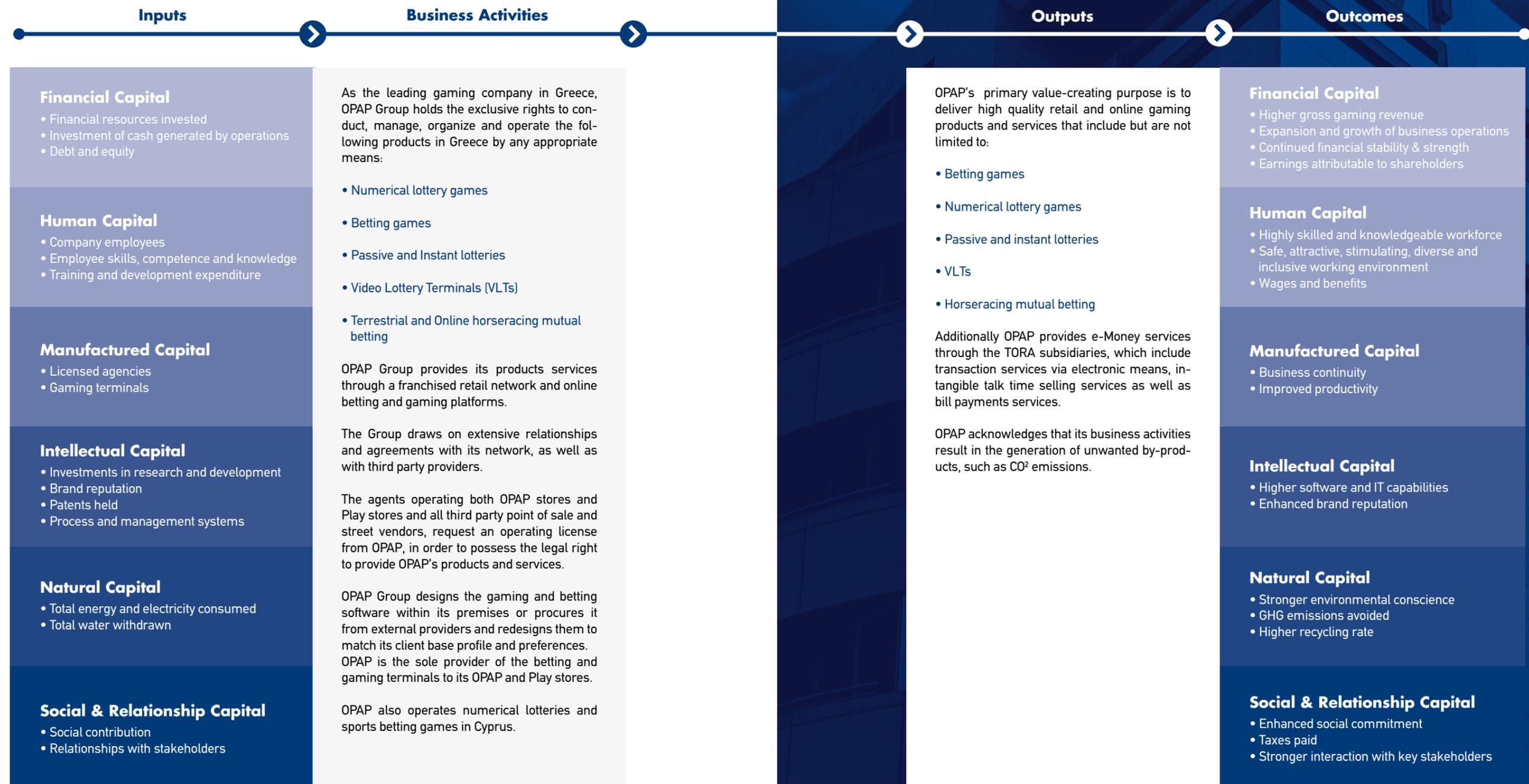
We communicate our corporate sustainability strategy and performance, and respond to investors and ESG analysts' requests for information.

OPAP has been included in the Financial Times Stock Exchange 4Good (FTSE4Good) Emerging Index, which assesses listed companies in emerging markets with a positive financial, environmental and social performance, based on a range of corporate social responsibility criteria.

Its inclusion in the FTSE4Good index demonstrates OPAP's commitment to build a comprehensive sustainability strategy by embedding sustainable ESG practices into its business management.

E.2 How we Create Value

Through our business model we create our leading products and services and implement our mandate of creating sustainable value for our stakeholders. The chart below illustrates the value creation process of our business. It outlines how each form of capital is utilized and subsequently transformed through our business activities, thus enabling the creation of value for OPAP and our stakeholders.



2019 Value Scoreboard

The scoreboard presents OPAP Group's 2019 key figures in Greece and Cyprus.

Our resources (key inputs)

Value created (key outcomes)

Financial Capital			
€ 408.6 M Net debt	€ 771.9 M Total equity	€ 96.5 M Share Capital	€ 57 M Utilized for investments
Human Capital			
1,557 Employees	39% Women in total workforce	€ 340,000 Invested in employee training courses	
Manufactured Capital			
3.977 OPAP stores	428 OPAP Play stores	25.000 Play-game machines (VLT)	€ 98.3 M Property, plant and equipment
Intellectual Capital			
OPAP brand as the leading entertainment company in Greece		€ 1.066 M Intangible assets	
Natural Capital			
6,117 MWh Electricity consumption	5,486 MWh Vehicle fleet consumption		
Social & Relationship Capital			
€ 25 M Investments through OPAP's societal support program	91% Local suppliers		

Financial Capital			
€ 1,620 M Gross Gaming Revenue	€ 412.6 M EBITDA	€ 4,468 M Ammounts wagered	€ 279.3 M Net cash from operating activities
Human Capital			
84% Employees trained	321 courses Training courses completed	€ 79 M Employee wages and benefits	
Manufactured Capital			
€ 21.5 M Depreciation			
Intellectual Capital			
€ 78 M Amortization		€ 30.3 M Goodwill	
Natural Capital			
5,574 tn Co2-eq Total GHG emissions		10,920 kg Office paper recycled	
Social & Relationship Capital			
>2.9 M Number of people benefited from OPAP's societal support program		2.3 job positions Sustained in the Greek market by 1 position in OPAP Group and network*	

* Source: Foundation for Economic and Industrial Research, May 2019.

E. COMPANY VALUE CREATION

E.3 Operating Responsibly

We recognize that in order to enhance our performance, we ought to have a decisive, disciplined and transparent working environment. Our objective is to set the correct guiding principles and ensure that our mission and values are sufficiently communicated among employees. Sound guiding principles can help OPAP better serve the public interest and prevent the intangible value of its reputation from declining. Therefore, we have firmly established a range of standards and mechanisms that allow us to fulfill our objective and operate responsibly.

E.3.1. Compliance

We closely monitor the regulatory and legal framework related to our activities, in order to apply its relevant provisions. It must be noted that in 2019, no penalties were imposed regarding compliance issues by the respective regulatory authorities, such as the Hellenic Gaming Commission.

In 2019, OPAP put its Compliance Module Application in practice. Through this active compliance management tool, OPAP is able to automate its Network Compliance Monitoring Process, reduce the time needed to manage all compliance risks and use technology to optimize business processes.

CODE OF CONDUCT

Our [Code of Conduct](#) outlines the main principles and behavioral rules, as well as provides guidance to all members (i.e. Board of Directors, Chief Officers, managers and employees) on issues that may arise within OPAP. The Code was updated in 2018 and was communicated to all employees in early 2019. All employees were asked to acknowledge and accept its guiding principles and provisions. The code covers the following theme areas:

- governing principles and company values,
- operational framework,
- personal and business integrity,
- protection of assets and customers of OPAP Group,
- people: respect for the individual, equal opportunities, diversity,
- whistleblowing complaints policy and
- ensuring stakeholders' awareness.

The Code of Conduct strictly prohibits all employees to offer, solicit or accept gifts, donations, in cash or in any other form, and any benefit related to the performance of their duties. They may only be allowed to accept or offer non-cash gifts/hospitality of value not more than €150 arising out of customary business practices. In this case, pre-approval must be received from the immediate manager and the fact that a gift was offered or received must be reported to the Chief Regulatory and Compliance Officer, who maintains a gifts and hospitality registry. Gifts should be transparent, infrequent and should not be offered or accepted during contractual negotiations, tender processes or if aware that one is imminent with a supplier. Offering hospitality/tickets to events should be solely for the purpose of OPAP Group employees building business relationships. It is important that gifts or hospitality never influence business decision-making processes, or cause others to perceive an influence.

OPAP Group is committed to maintaining the highest standards of ethics and integrity in the way it does business in Greece and Cyprus. Fraud, bribery and corruption in all forms are illegal and unacceptable.

It must be noted that in 2019 there were:

- No confirmed incidents of corruption or pending lawsuits related to corruption or relevant sanctions imposed by respective authorities.
- No legal accusations of corruption filed against the company or pending accusations of corruption or legal fines imposed on grounds of corruption against the company.

RAISING CONCERNS AND WHISTLEBLOWING

The Company is committed to conducting its business with honesty, integrity and fairness and expects all stakeholders to maintain these high standards. However, all organizations face the risks of things going wrong from time to time. The company has established the Whistleblowing Complaints Policy by which employees can and should report valid allegations of known or suspected improper activities, in good faith and without the fear of retaliation, to their immediate manager and the Chief Regulatory and Compliance Officer respectively.

Any person can file a complaint or concern in one of the following ways:

- Via an electronic platform accessible to the stakeholders by sending an email to whistleblowing@opap.gr
- By contacting the number 210 5798193
- Via a personal hearing

Complaints received under the Whistleblowing Complaints Policy will be reviewed under the oversight of the Audit Committee, by the company's Chief Regulatory and Compliance Officer, the Internal Audit Team, or such other persons as the Audit Committee or the Chief Regulatory and Compliance Officer determine to be appropriate.

The above policy aims to encourage people to immediately report suspected incidents and guarantees that their concerns will be taken seriously and investigated as appropriate.

In 2019, two complaints were raised through the whistleblowing mechanism. Both complaints were appropriately dealt with and were subsequently closed.

INTERNAL RULES AND REGULATIONS

Our [Internal Rules and Regulations](#) are prepared in compliance with the applicable legislative framework and based on the company's Articles of Association. They describe the way we regulate the organization and the operation of the company in order to ensure:

- Business integrity.
- Transparency of business activities.
- Control over management and how management decisions are made.
- Compliance with legislation and the Concession Agreement's obligations.

In 2019, following significant changes of the provisions of Law 4548/2018, OPAP proceeded with updating its Internal Rules and Regulations, which are expected to be finalized within 2020, so as to meet the requirements set by new online draft regulations. Additionally, the Policy on the handling of inside information and the prevention of market abuse, which constitutes part of the Internal Rules and Regulations, has been updated and approved.

ADHERING AND FOLLOWING FAIR COMPETITION RULES

The regulated gaming market in Greece consists of the following operators, licensed by the Hellenic Republic: OPAP S.A., Hellenic Lotteries S.A., Horse Races S.A. and casinos.

Additionally, 24 online gaming operators, which are not licensed in Greece but hold gaming licenses from other EU Member States, are legally allowed to provide services in Greece pursuant to Law no. 4002/2011, as modified, establishing a transitory regime.

We recognize our responsibility to follow fair competition practices and refrain from engaging in any activities non-compliant with competition law. Indicatively, within this context we:

- Comply with the relevant competition laws and legislation.
- Do not adopt illegal or unethical business practices.
- Do not allow our employees to share confidential information with third parties.
- Enable all our employees to seek guidance or advice from the Chief Regulatory and Compliance Officer regarding activities which could potentially breach competition law.

In 2019, OPAP did not receive any antitrust complaints, anti-competitive behavior or monopoly practices complaints, or any fines/ non-monetary sanctions on these issues. Agents who refused to sign the new OPAP Agency contract submitted several petitions for interim measures/ lawsuits, claiming that OPAP has breached competition law in force, by terminating their agency contracts in February and March 2017. All respective petitions for interim measures (and respective temporary orders) were rejected by competent courts. With regards to pending lawsuits, thirty-one (31) decisions have been issued by the Athens First Instance Court by virtue of which respective argumentation raised by the claimants was rejected.

It is also noted that in 2019, OPAP made filings to Greek and Cyprus regulatory and competition authorities regarding the Stoiximan transaction. On 04.11.2019, the Company was informed for the approval of the merger control notification regarding OPAP's Stoiximan investment by the Hellenic Competition Commission (HCC) (HCC/01.11.2019). The transaction is additionally subject to clearance by the Cyprus' Commission for the Protection of Competition and the competent gaming regulatory authorities. Following the above clearance and the final closing of the transaction, the Company will gain joint control together with two shareholders of TCB Holdings Ltd ('TCB') in Greek and Cypriot operations of GML Interactive Ltd ('GML'), 100% subsidiary of TCB.



E.3.2. Integrated Management System

At OPAP S.A. we implement an Integrated Management System (IMS) in accordance to international standards. Each [Management System](#) takes into consideration the structure and requirements of the other systems. Within the context of our IMS, we operate the following Management Systems:

- ISO 9001 Quality Management System certified by Lloyd's Register Quality, since 2004.
- ISO 14001 Environmental Management System certified by Bureau Veritas, since 2004.
- ISO 50001 Energy Management System, certified by Bureau Veritas, since 2018.
- OHSAS 18001 Occupational Health and Safety System certified by Bureau Veritas, since 2017.

INTEGRATED MANAGEMENT SYSTEM

 ISO 9001 QUALITY MANAGEMENT SYSTEM <hr/> Certified by Lloyd's Register Quality, since 2004.	 ISO 14001 ENVIRONMENTAL MANAGEMENT SYSTEM <hr/> Certified by Bureau Veritas, since 2004.
 ISO 50001 ENERGY MANAGEMENT SYSTEM <hr/> Certified by Bureau Veritas, since 2018.	 OHSAS 18001 OCCUPATIONAL HEALTH & SAFETY SYSTEM <hr/> certified by Bureau Veritas, since 2017.

It must be noted that within 2019, we:

- Successfully completed the re-certification of our Quality Management System according to ISO9001:2015 and our Environmental Management System according to ISO14001:2015.
- Trained 138 new employees on our Management Systems through the Corporate Induction program

[See F.4.4 Training and development](#)

E.3.3. Anti-Money Laundering

We comply with the applicable framework and the Hellenic Gaming Commission's Decision no. 129/2/2014, as currently in force, which introduced measures to prevent money laundering and terrorism financing in the gaming sector.

OPAP has an "[Anti-Money Laundering and Counter Terrorism Financing Policy](#)" in place for OPAP S.A., Hellenic Lotteries S.A., and Horse Races S.A. which applies to all employees, agents and salesmen of OPAP products. The AML/CTF Policy describes a set of principles and procedures to minimize the risk of using OPAP's products for money laundering and terrorism financing.

As mandated by the Policy, the AML Compliance Officer, who is appointed by the Board of Directors and notified to the Hellenic Gaming Commission, is responsible to continuously assess AML risks and submit recommendations to the Board of Directors, in order to effectively mitigate those risks.

The Board of Directors also receives and assesses an AML semi-annual Report with the actions and the measures taken to prevent money laundering and terrorism financing.

AML/CTF PROGRAM

OPAP conducts regular audits to internal stakeholders and its network, in order to ensure their compliance with the Policy and the AML/CTF requirements.

During these audits, we review the following:

- Compliance of the network with the AML/CTF Policy.
- Proper implementation of the Know your Customer (KYC) procedure for new and existing players.
- Compliance with procedures to identify and report suspicious transactions.
- Proper record keeping.
- Review of player behavior in order to provide winning certificates to players.

Furthermore, we have introduced a digital platform (www.winningscertificates.gr), which enhanced our KYC and AML procedures with regards to issuing winnings certificates and significantly improved the efficiency of the issuing process.

As a result of the above-mentioned practices, within 2019, we:

- Performed 821 AML audits to our network.
- Identified 15 violations of procedures from agents and imposed monetary fines.
- Imposed € 67,000 worth of fines regarding non-compliance with law and regulations to our agencies.
- Submitted 64 reports to the Hellenic Financial Intelligence Unit for suspicious or unusual transactions involving 93 individuals.

In 2019, no legal actions regarding incidents of money laundering and terrorism financing were taken against OPAP and no fines or sanctions were imposed to OPAP for AML/CTF issues. We had no incidents of contract termination or no renewal due to money laundering violations.

AML/CTF TRAININGS

We provide continuous training on AML/CTF issues for our employees and agents and we inform and notify them in case there are changes in the regulatory framework.

Within 2019:

- The AML Team and the AML Officer attended a series of training courses.
- The mandatory AML e-training course, which had started in 2018, was concluded with the participation of the majority of the network.
- A similar mandatory AML e-training was also completed by all OPAP, Hellenic Lotteries and Horse Races employees.
- We communicated messages to the entire retail network to inform them about their key obligations under the AML Regulation and our relevant AML Policy.

Anti-Fraudulent Activity and Investigations

In 2014, we established the Anti-Fraud Team (AFT), which co-operates end-to-end with all teams and Divisions across the company and the companies of the Group. The Team is responsible for the investigation and tackling of internal and external fraudulent activities across OPAP network, OPAP and all its subsidiaries and products. Furthermore, the team cooperates and reports any findings of fraudulent nature to the authorities, responds to their inquiries and supports any legal actions taken thereafter.

The AFT is a vital part of the OPAP Security and Risk Management Team, covering both online and retail areas. With regards to retail, the AFT participated actively in the launch of the checks and balances for the OPAP network of Cyprus in 2019. At the same time, the AFT ensures that none of the benefits of the incentive schemes offered by OPAP to its customers have already or will in the future be abused or manipulated by high risk customers.

The AFT reviewed half of the 125,000 individual online payments that took place in 2019, which amounts to approximately € 10 million. Subsequently, 31 accounts were blacklisted due to concrete findings of inappropriate or illegal activity, while approximately 1,800 accounts were discontinued as duplicates.

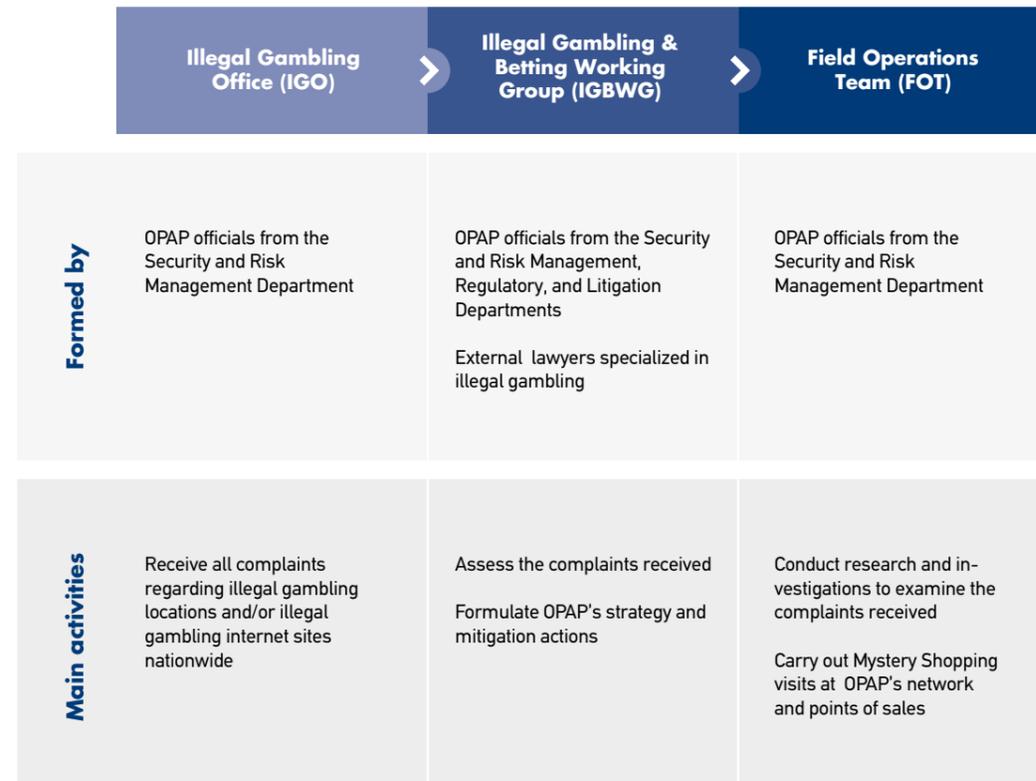
425 accounts were investigated as they were reported to have utilized data which was stolen from an unknowing third party or used without their consent. In some cases, cooperation with prosecuting authorities was established to fulfill the investigation. Furthermore, 1,441 cases were investigated as the card used for transactions was either used without consent or stolen from the rightful owner.

It should be mentioned that the cases of bonus abuse in 2019 reached approximately 2,500 amounting a total of € 260,000, while dispute and chargeback requests for the retail network was recorded at approximately 130 cases, of which 80 were generated by the prosecuting authorities and 50 from systemic banks.

In 2019, five cases required detailed investigation from the AFT, based on intel and indicators that gave an early warning. The result of the detailed investigations provided answers that were not alarming for OPAP, nonetheless the value gained was the experience and proactive measures that were implemented.

E.3.4. Addressing Illegal Gambling

Acknowledging our role as the leading gaming company in Greece, we strive to address the issue of illegal gambling in the market. Illegal gambling practices not only endanger the industry's reputation but more importantly, the players' wellbeing. Therefore, we make every effort to support the authorities in their battle against the illegal gambling phenomenon, either online or offline, and at the same time work towards establishing a fair and accessible-to-all gaming environment that offers entertainment to the general public.



The Illegal Gambling Office (IGO), internally established in 2017, is responsible for receiving all complaints regarding illegal gambling activities nationwide. Complaints can be reported through its telephone lines, 210 5798362 and 210 5798363, and through email at igISOo@opap.gr. The IGO collaborates with the Illegal Gambling and Betting Working Group (IGBWG) and supports it in drafting the strategy of the company regarding the mitigation of the illegal gambling phenomenon.

The IGBWG, established in 2017, meets every week and deals with the complaints, received by the IGO regarding illegal gambling locations and/or illegal gambling internet sites. The IGBWG assesses the cases and decides on the best course of action as well as formulates OPAP's strategy against illegal gambling.

Apart from formally forwarding all complaints to the relevant authorities, the Security and Risk Management Team of OPAP, assists the authorities by deploying the Field Operations Team (FOT). The FOT, established in 2017, conducts further research and investigations to examine the complaints received, in order to gather additional market intelligence that can be of use to the relevant authorities. In addition, the FOT carries out Mystery Shopping visits at OPAP's agencies and Gaming Halls. FOT is also responsible for:

- Giving official testimonies regarding illegal locations and/or websites for which FOT members have gathered market intelligence. Alternatively, an official complaint is forwarded to the relevant authorities, signed by the head of OPAP's Security and Risk Management Department. The testimonies of the FOT members are given to local prosecutors and/or police authorities (i.e. Financial Police, Cyber Crime Unit etc.), as stated in the guidelines provided by IGBWG.
- Continuous monitoring of locations and websites that have operated or operate illegally, on a regular basis, providing updates to the authorities regarding any developments.
- Supporting the owners of OPAP stores and OPAP Gaming Halls when they are facing cases of break-ins, robberies and thefts.

Addressing Illegal Gaming in 2019



Inspecting our Points of Sale

We defined an explicit internal Mystery Shopping Process in order to realize the optimal monitoring of our network given the available resources.

The main goal of the new process is to provide checks and balances and thus a clear view of our network, making sure that legal and regulatory framework concerning e.g. Responsible Gambling is respected nationwide and as of 2019, in Cyprus also.

This is monitored by uniformly issuing Mystery Shopping visits across our entire network – OPAP agencies, Play Gaming Halls and Hellenic Lotteries points of sale.

In 2019, the FOT included the OPAP network of Cyprus in its portfolio. The sample of visits showed a high level of compliance to legal and regulatory framework. The excellent cooperation with the Management of Cyprus and the acceptance of the project from both the Cyprus network and Cyprus authorities highlighted the cornerstone of a new era for OPAP.

In addition to Mystery Shopping visits, the Security and Risk Management Team of OPAP, performs CCTV footage reviews, exclusively for the OPAP Play network, that further support the monitoring of compliance to the relevant policies and procedures.

FOT's inspections and Mystery Shopping visits at OPAP stores in 2019

3,590

inspections and Mystery Shopping visits were conducted at our sales points, covering 40% of the total number of OPAP agencies and Play Gaming Halls.

4,026

CCTV footage reviews were conducted, covering all OPAP Play Gaming Halls.

Internet Gambling Inspections

The Security and Risk Management Team performs checks and investigations on internet gambling sites. Specifically, the inspections focus on sites available to users from Greece and websites that are on the blacklist of the Hellenic Gaming Commission (HGC).

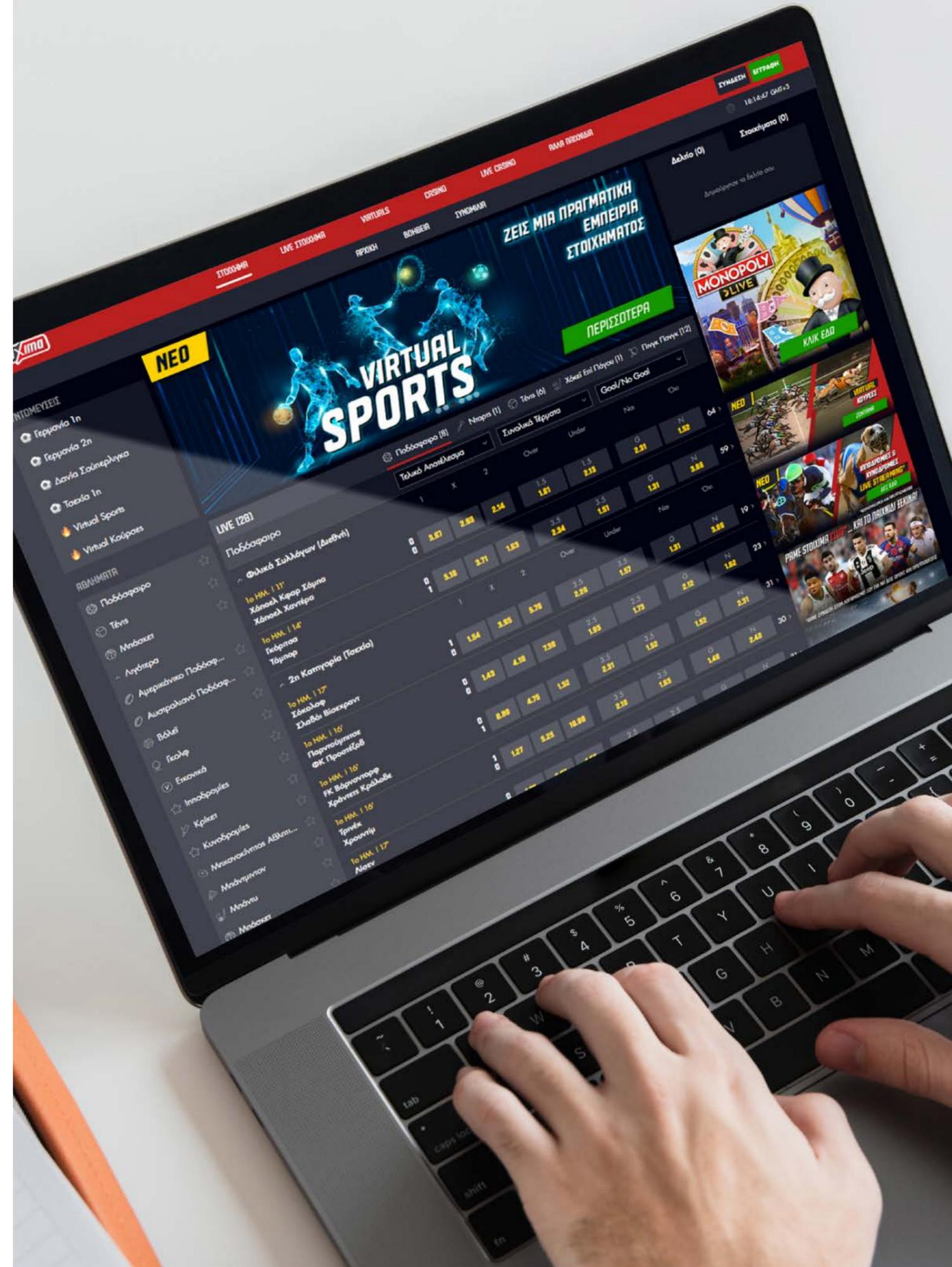
Regarding internet sites that are available to users from Greece, the main areas of concern are compliance, commercial policy and licensing. For websites on the blacklist of the HGC, the focus is on the accessibility (or lack thereof) of the sites in question and their attempts to bypass the blockage by generating sites with a similar URL address.

All findings produced from the inspections are forwarded to the Regulatory, Competition and Compliance Team, which carries out the appropriate follow-up actions for each case.

Raising Awareness

In 2019, OPAP raised awareness about illegal gambling by:

- Informing OPAP's Area Sales Representatives about illegal activity in their respective areas of responsibility, while receiving valuable feedback.
- Informing relevant stakeholders (e.g. local authorities, police) to raise awareness on the matter.

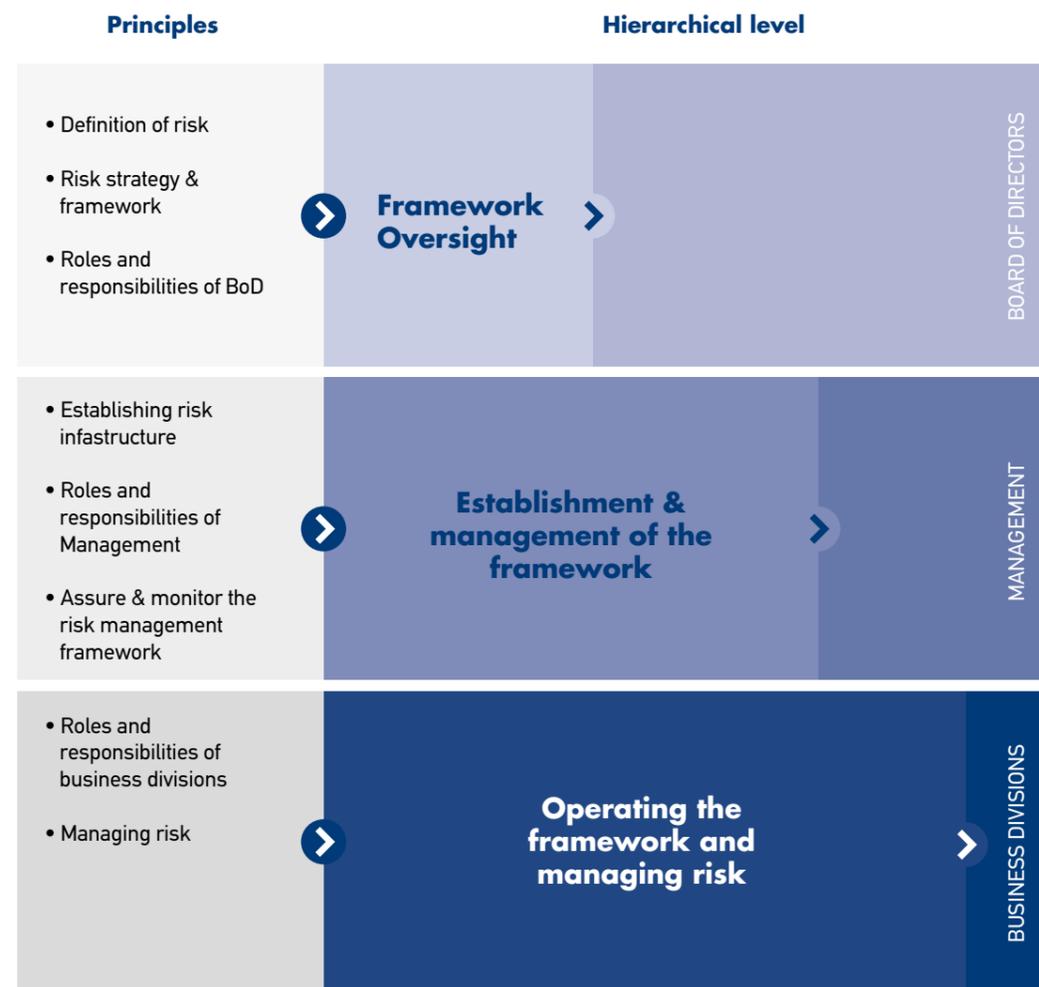


E. COMPANY VALUE CREATION

E.4 Risk Management

We apply extensive internal controls and use risk management systems. Internal controls and audits are planned based on identified risks and the results of the internal audits are fed back to the risk management process.

In 2019, OPAP's BoD approved a new risk management framework outlining principles and defining respective roles and responsibilities.



Internal Controls and Audits

We have established a System of Internal Controls based on best international practices, designed to assure we will achieve:

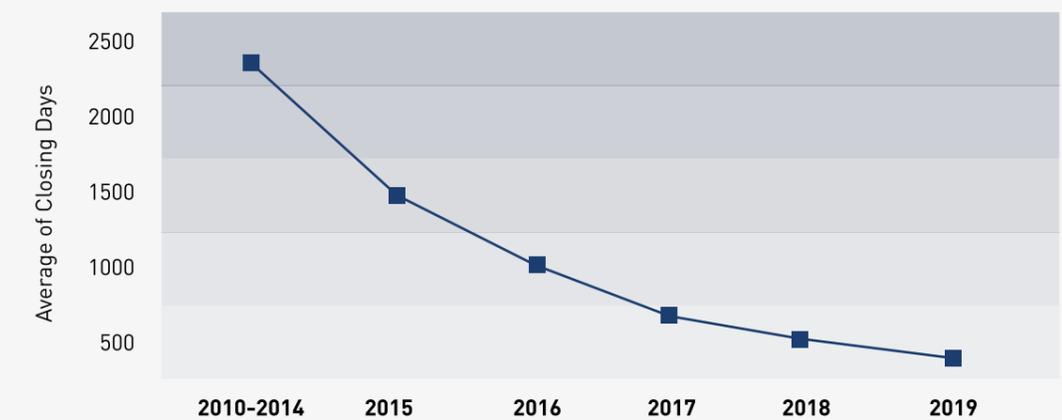
- Efficiency and effectiveness of the work.
- Reliability and completeness of the financial and management reporting.
- Compliance with the applicable legal and regulatory framework.

In 2019, OPAP made significant progress towards achieving its strategic priorities relating to Internal Audit, including supporting enterprise-wide digital initiatives, or enabling continuous auditing, or strengthening collaboration with other Governance, Risk and Compliance (GRC) teams, and adopting lean and agile ways of working and reporting.

The Internal Audit Team complies with International Standards for the Professional Practice of Internal Auditing and uses MetricStream integrated GRC solution for internal audit management, risk management, compliance management, and issue management. With the use of this solution, the Internal Audit Team managed to close twice as many internal audit issues, while also doubling auditor productivity and reducing the total internal audit costs.

Following the results of internal audits conducted within 2019, management considered all findings and the appropriate teams decided upon the design and implementation of corrective measures. In addition, issues were resolved and closed in significantly accelerated time year-over-year by 80%.

Days (average) to Close Audit Issues



Risk Management

We follow a comprehensive annual enterprise wide approach to identify, measure and prioritize key risks that may affect the achievement of our strategic objectives.

The risk registry incorporates elements of the Internal Controls – Integrated framework (COSO model 2013). We have identified 10 major risk categories, each of which comprises of relevant subsequent risks. These risks are identified and discussed in workshops or during Project Steering Committees and one-on-one interviews with Chief Officers.

The main risks and measures identified for 2019 are presented in the following table.

Risk Category	Risk	Existing Measurements/ New Mitigating Actions
Strategic External	<ul style="list-style-type: none"> • Competition Risk • Customer Wants Risk • External Fraud Risk • Regulatory Risk • Tax Change Risk • Technological Innovation Risk • Country Political-Economic Risk • Pandemic Event Risk 	<ul style="list-style-type: none"> • Development of new products, by using new technology, to increase customers and customer loyalty. • Establishment of a risk and security team that monitors external fraud risks. • Engagement and communication with authorities, regulators and other key stake holders, to continually monitor the changing regulatory/legal landscape, especially for licensing of games of chance in Cyprus. • Maintenance of the required tax planning resources and development of contingency plans. • Formation of a Crisis Team and monitoring of the developments from the COVID 19 outbreak closely, following guidance from the local health authorities and adhering to the requirements implemented by the Greek and Cypriot government. The Group has implemented contingency plans
	Strategic Internal	<ul style="list-style-type: none"> • Business Model / Planning / Strategy Risk • Business Portfolio Risk • Organizational structure Risk • Succession Planning Risk

Risk Category	Risk	Existing Measurements/ New Mitigating Actions
Strategic Sustainability	<ul style="list-style-type: none"> • Reputation, Image and Branding Risk • Shareholders Value Risk 	<ul style="list-style-type: none"> • Monitoring of specific KPIs and targeted communication with stakeholders. • Disclosure of non-financial information using GRI Standards. • Enactment of the WLA-ISO certified management systems.
Compliance	<ul style="list-style-type: none"> • Anti-Money Laundering Risk • Compliance Risk • Privacy Risk • Responsible Gaming Risk 	<ul style="list-style-type: none"> • Monitoring of the correct implementation of the new Corporate Law requirement by the Legal Team • Revision of Anti-money laundering policies.
Operational-People	<ul style="list-style-type: none"> • Performance Incentives Risk • Skills and Knowledge Development Risk 	<ul style="list-style-type: none"> • Establishment of goals, development of plans and performance appraisals for all Group employees. • Provision of e-learning material related to the Group processes, ethics and culture
Operational-Information	<ul style="list-style-type: none"> • Confidentiality Risk • Technology and Systems Changes Risk • Availability Risk • Data Integrity Risk 	<ul style="list-style-type: none"> • Monitoring of high availability third party Service Level Agreements (SLA). • Monitoring of the GDPR action plan by the Data Protection Officer. • Operation of anti-tampering systems. • Deployment of Technology and Systems Changes procedures. • Certified according to the World Lottery Association Security – WLA-SCS/ISO 27001 standard. • Establishment of an Information Security Committee to review the status of group cybersecurity measures and semi-annually report to the BoD

Risk Category	Risk	Existing Measurements/ New Mitigating Actions
Operational-Process	<ul style="list-style-type: none"> Business Interruption Risk Capacity / Scalability / Performance Gap Risk Channels Effectiveness Risk Customer / Agent Satisfaction / Relationship Management Risk Process Risk Product / Service Failure Risk Third Party Management / Outsourcing Risk 	<ul style="list-style-type: none"> Monitoring of long-term outstanding receivables on a regular basis. Monitoring of each shop on a monthly basis by sales representatives, providing guidelines and support, when needed. Resolution of player related issues by VLT and sports betting online management. Establishment of dedicated project and product teams, with a special delivery plan to be followed. Implementation of third-party management and SLA monitoring processes.
Reporting-Credit	<ul style="list-style-type: none"> Credit Concentration Risk Settlement Risk Interest Rate Risk 	<ul style="list-style-type: none"> Collection of agents' guarantees. Processing of agents' settlements through the TORA payments gateway by the Credit Team, TORA Operations and Product Team. Hedging of floating interest loans via an interest rate swap.
Reporting-Financial	<ul style="list-style-type: none"> Budget and Planning Risk Operations Measurement Risk 	<ul style="list-style-type: none"> Budget forecast preparation, monitoring and revision by the new Central Analysis and Reporting Team.
Public Reporting	<ul style="list-style-type: none"> Financial Reporting Risk 	<ul style="list-style-type: none"> Provision of assurance of Financial Statement figures by a big four audit firm.

Ensuring Business Continuity

In order to ensure our uninterrupted operation, we:

- Have included our information security requirements, related to continuity, in our Business Continuity Management Policy.
- Have identified, classified and rated processes and information assets for their required recovery time and point objective, during our Data Asset inventory's development.
- Have developed disaster recovery plans for critical and essential information systems and infrastructure and have established alternative sites/facilities to support recovery of business operations and IT systems at any time.
- Follow specific backup policies for information and information systems.
- Use systems that guarantee high availability for critical business applications related to games' operations and availability.
- Have tested the relevant parts of the business continuity plan due to the impact of, the post balance sheet event as of 31 December 2019, COVID-19 in our daily working practices.

Addressing Coronavirus (COVID-19) Impact

OPAP has three clear objectives during this exceptional period:

- Protecting the health, safety and wellbeing of our employees, agents and communities.
- Taking mitigation steps to minimize impact ahead of the future resumption of business.
- Protecting the financial position of the Group.

OPAP has implemented several measures to ensure the normalcy of operations to the extent possible, invoking business continuity plans where appropriate, that will also safeguard a quick ramp-up of the business once government limitations are reduced. In addition, large parts of the Group continue to operate on a 'business as usual' basis, albeit while more than 98% worked from home.

Per order of the government relevant to COVID-19 restrictions, OPAP stores and PLAY Gaming Halls in Greece were ordered to be closed as well as retail shops in Cyprus. In addition, the horse racing facility at Markopoulo Park was closed. Moreover, the nationwide lockdown and traffic restrictions in place in Greece restricted street vendors for the distribution of Hellenic Lotteries' products (Scratch and Passive lotteries). Online operations throughout this time operated normally and experienced an increase in registrations and activity. We also provided guidance to our agents' network on how to benefit from Government relief measures and offered tailor-made support where necessary.

We directly supported the competent bodies, by proceeding to the donation of medical supplies and equipment, offered 'OPAP in the Neighborhood' program's mobile health units at the disposal of public health system, delivered a modern infectious diseases unit as part of the children's hospital renovation program, and supported the Cypriot Government with funding for the acquisition of medical equipment and a public information campaign.

FINANCIAL IMPACT

It is anticipated that these developments will materially impact the company's financial performance in 2020. The extent of the impact depends on factors including the duration of the outbreak, how much longer restrictions remain in place, any further measures taken by governments, and the extent of the subsequent economic disruption. The retail business of OPAP operates exclusively a model through commercial representatives (agents) that are compensated with a commission based on actual gaming revenues, while revenue sharing agreements also exist with vendors for a number of our largest products, notably VLTs and Sportsbetting. This operating model helps to support a relatively low fixed cost base, allowing OPAP to better manage the impact on profitability.

BALANCE SHEET

Given the current circumstances, the uncertainty and rapidly changing nature of the situation, OPAP is aiming to maximize its liquidity within the Group. OPAP is already protecting its cash flow by pro-actively managing its capital expenditure and working capital as well as identifying opportunities for cost savings that will not impact the long-term success of the Group.

BUSINESS CONTINUITY

OPAP has implemented a number of measures to ensure normal operations (to the limited extent those are being offered currently), invoking business continuity plans where appropriate, that will also safeguard a quick ramp-up of the business. In addition, large parts of the Group continue to operate on a 'business as usual' basis, albeit working from home.

Management remains vigilant regarding the extent of COVID-19 impact and OPAP will continue to ensure best practices are implemented for effective business continuity.

Identifying the most Material Issues for our Sustainable Operation

OPAP is continuously informed about the global economic, environmental and social issues that are surrounding the business community and strives to ensure that these global issues are taken into consideration during the development of our sustainability strategy. As the leading gaming Company in Greece we acknowledge the sheer size of our business operations and the subsequent impacts it can incur on the economy, the environment and society.

Therefore, we identify the issues that are most material for our sustainable development and our stakeholders. In 2017, we identified and prioritized these issues through a 4-phase methodology, as follows:

PHASE 1: SUSTAINABILITY CONTEXT

Potential material issues were identified by evaluating OPAP's operation and strategy, future trends and current global industrial practices. Through this process, we identified 38 issues.

PHASE 2: MATERIALITY ANALYSIS BY OPAP MANAGEMENT

Most of these issues had already been included in the risk register of OPAP, which comprises of the full list of risks identified and assessed by the Senior Management (i.e. Chief Officers). The CEO and the BoD monitor the process and its results.

For each issue, OPAP Senior Management had its potential impact and likelihood of occurrence assessed.

The new issues that had not been assessed during the formal risk management process, were assessed at a second phase by members of the Senior Management.

PHASE 3: STAKEHOLDER ENGAGEMENT

To assess stakeholders' expectations and interests, we used the feedback and messages that we had received from our stakeholders through our communication with them. We also used the findings of all available surveys conducted in the year. Information was retrieved from various sources, functions and units of our operation.

PHASE 4: PRIORITIZATION

The outcomes from the above phases were combined to generate the materiality map (presented below), which depicts the significance of all issues to OPAP and its stakeholders.

We acknowledge all issues as important for our sustainable development, focusing on the issues identified as material for OPAP and our stakeholders.

OPAP MATERIALITY MAP



E. COMPANY VALUE CREATION

E.5 Stakeholder Engagement

Stakeholders are defined as anyone who influences or is influenced by our operations, throughout our value chain and across our operations. It is of paramount importance for OPAP to conduct a systematic and regular dialogue with them, in order to respond to their needs and expectations, in an effort to improve ourselves, both in the short and long term.

In 2019, we reviewed our stakeholder groups and decided to reconfigure them, by merging some of the initial groups to new ones. This will enable us to improve our stakeholder engagement process.

The stakeholders recognized by OPAP are:

- Employees (including employees, Board of Directors, management team, trainees)
- Players and Prospective Players
- Sales / Distribution Network (including agents, street vendors, retailers)
- Shareholders, Investors and Analysts (including shareholders, bondholders, private investors, institutional investors, funds and asset managers, analyst organizations and associations, rating agencies)
- Society (including media, suppliers, industry members and associations, non-governmental and academic organizations, state, government authorities and local communities, European Lottery Association, World Lottery Association, NGOs, institutions, academic organizations, treatment providers association)

Through our engagement with our stakeholders we utilize a range of methods of interaction to understand their main issues of interest.

EMPLOYEES

Our employees are our most valuable asset. To understand our employees, we conduct an annual employee survey to gain feedback on our employees' attitude, motivation and satisfaction with regards to our operations. We have found that the main issues of concern for our employees are the issues of code compliance, health and safety, equality and fairness and labor practices.

We actively communicate with our employees, on a daily basis, using internal communication means such as regular e-mail announcements and monthly internal newsletters. Promoting our values to our employees is also a very important part of our approach. Therefore, we organize internal awareness campaigns, corporate and social events and encourage our employees to participate in them.

[See sections E. Company Value Creation and F.4 Developing our People](#)

PLAYERS AND PROSPECTIVE PLAYERS

We firmly abide to our mandate of promoting responsible gaming and responsible communication by using various means of communication. We communicate the principles of responsible gaming to our players and the general public by organizing awareness campaigns, publishing press releases and articles and posting regular posts on our social media. In addition, we carry out annual satisfaction surveys, via our contact center, to learn more about our players' experiences with our products and services. Our engagement practices with our players and the general public have revealed highly instructive results and show that the key issues that concern them are players' privacy, the company's donations and societal support activities and its business entrepreneurship activities.

[See sections E.6 Customer Satisfaction, F.2 Protecting our Players and F.5.1 Responsible Donations and Sponsoring](#)

SHAREHOLDERS, INVESTORS AND ANALYSTS

OPAP sheds great importance in creating value for its shareholders and investors. OPAP publishes annual and quarterly reports presenting its financial data demonstrating the company's financial performance. Together with annual and quarterly reports, we publish our environmental and social performance in our annual Integrated report and on our website, assisting analysts in producing credible valuations for our organization. We also organize and participate in press conferences, roadshows, investors meetings and special events. The key issues concerning our shareholders, investors and analysts include but are not limited to financial and operational performance, strategy, governance as well as anti-corruption, public involvement, corporate responsibility, donations and support.

[See all sections of this Report](#)

SALES / DISTRIBUTION NETWORK

OPAP's licensed agents, street vendors and retailers are the immediate administrators of our products and services. We place great importance on their work and thus continuously communicate with them to help them develop their capabilities. We organize one-to-one meetings, awareness campaigns and offer training schemes to disseminate material regarding responsible gaming and new products and services. From our continuous communication we have found that the issues that concern our partners in our sales network include, but not are not limited to, customer satisfaction, customer privacy, money laundering, network compliance, responsible gaming, responsible communication and financial transparency.

[See sections E. Company Value Creation, F.1 Achieving Financial Results, F.2 Protecting our Players and F.3 Enhancing our Network](#)

SOCIETY

Supporting our work to create a positive impact on the society, are our partnerships with local and international NGOs, academic organizations, associations, media, industries, and suppliers. Additionally, within this context it is important to note that we heavily value and consistently seek to improve our relationships with the State, government authorities and local communities in the areas we operate. We engage with these partners by organizing formal communication channels, meetings, special events and collaborations as needed to strengthen relationships and preserve our reputation as the leading gaming company in Greece and Cyprus. A significant aim of our work is to make an impact through societal support programs. Our commitment to working with societal stakeholders remains at the core of our daily operations, which is why we aim to consistently communicate and collaborate on topics of concern to these partners.

[See all sections of this Report](#)

E. COMPANY VALUE CREATION

E.6 Customer Satisfaction

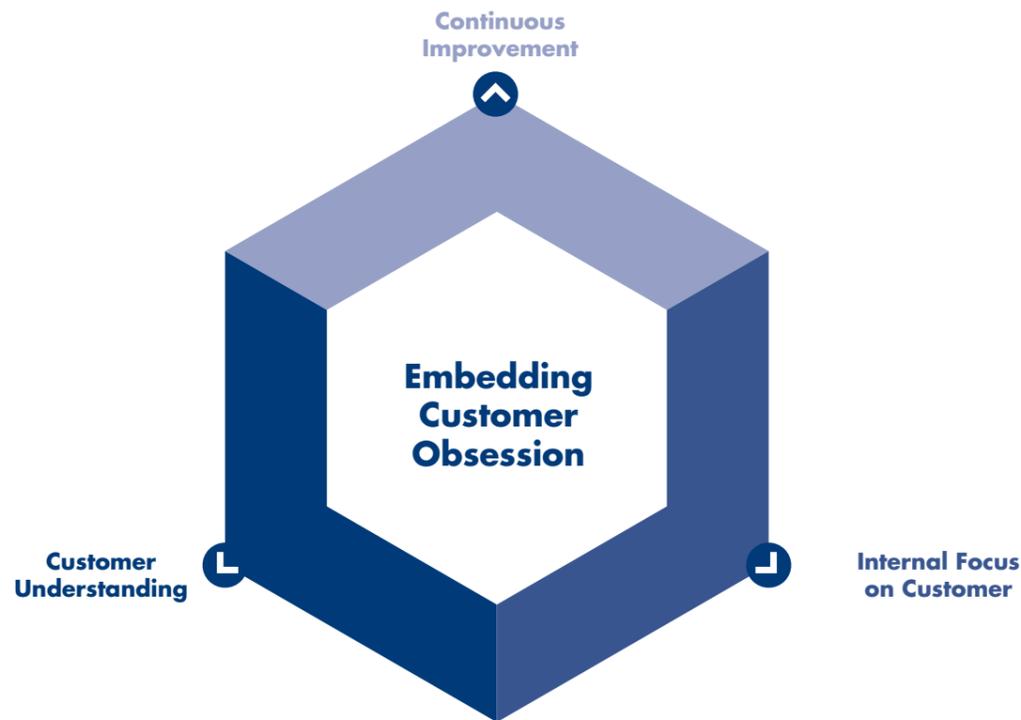
We implement a series of initiatives highlighting our reciprocal, sincere and trustful relationship with our customers.

In our efforts to systematically manage and engage with our customers, we have designed a specific framework, which consists of three comprehensive, tangible and easy to address focus areas: customer understanding, internal focus on customer and continuous improvement.

All customer service activities are performed in accordance with OPAP's ISO9001 Quality Management System, ensuring that processes are managed in a systematic way.

We support all our customers, i.e. players and retail channels (e.g. agencies, Play Gaming Halls, Hellenic Lotteries distribution network, Tora's products, online PAME STOIXIMA), through two Contact Center platforms, the Retail Contact Center and Online Contact Center.

Customers Approach



Customer Understanding

Understanding our customers is the key to effectively respond to their needs and create opportunities for the future.

In 2019, our Research team contacted 46,000 customers through more than 76 regular and ad-hoc research studies and 242 focus groups, in order to understand and monitor customer satisfaction, brand reputation and the reactions of our players to new games and game features designed for either online or offline environments.

Quarterly integrated Tracking Reports and relevant in-depth analyses on playability, customer satisfaction, brand reputation and corporate social responsibility areas were conducted and produced actionable insights regarding:

- **Customers' experience on OPAP's Sport betting propositions** (either in the retail setting or online platforms) including the overall satisfaction regarding the users' experience with the Self-service Betting Terminals.
- **Customer drivers and barriers, better understanding of needs**, (both covered and uncovered), overall satisfaction for our recently launched lottery platform (namely Tzoker.gr) as well as collecting new online game ideas.
- **Customer awareness, perceptions and attitudes towards our brand and corporate social responsibility activities** as well as the communication channels we use.
- **Overall satisfaction and experience of the games and the treatment received in our gaming halls** for our Play players. A dedicated study was also performed measuring our players' reaction to the enforcement of anti-smoking laws.
- **Creation of new Strategic Customer Segments** that enrich our understanding of drivers and barriers of key players' satisfaction through additional variables (demographic, behavioral and attitudinal).

Our Customer Relationship Management (CRM) and Customer Intelligence (CI) team contribute to better customer understanding through the following pillars:

- **Data Infrastructure:** The team enhanced datamarts used for all analytical tasks by adding flags depicting customer behavior patterns at each certain point of time. Additionally, new data infrastructure was designed for the automation of relevant and prompt CRM (loyalty) offers on Online Tzoker and OPAP Loyalty scheme.
- **Behavioral Segmentation/Predictive Modeling:** Various playability prediction models were developed for optimizing customer targeting with CRM offers.
- **CRM Campaigns Optimization:** An on-going process was established for monitoring and evaluating the targeted one-to-one communications and customer rewards. Generated insights were used for further optimizations so as to maximize players' satisfaction and campaigns' return on investment.

83% of our players

claim that their experience with OPAP was either as expected or even better, exceeding their expectations.

52% of the surveyed population

agree/strongly agree with the statement that OPAP guarantees right of operation of games, which rose to 73% of players in the 4th quarter.

Internal Focus on Customer

We encourage all OPAP employees to understand our customers better through various initiatives, such as the following:

- “Adopt a shop” program, was continued throughout 2019, where almost all employees visited an OPAP agency and gained a first-hand understanding of customers’ experience. A specific online survey was created to collect our employees’ feedback on customers’ experience; the form was updated quarterly, based on the new launches of the company, to provide the employees with better insights on customer perceptions and how customers’ experience can be improved.
- “Voice of the Customer” activations, in the context of which, we conducted “Contact Center visits” for our employees, during which they listened to live customer calls and talked with the Contact Center personnel who answer those calls. This experience allowed our employees to gain better insight of our players and agents, as well as learn the Contact Center basic principles.
- “Know Your Customer” activations, where over 250 employees participated as observers in customer focus groups to gain a better understanding on our customers’ way of thinking. They also visited our Contact Center to experience the type of service offered to agents and players.
- “National Customer Service Week” celebration, when various actions were organized to facilitate organization-wide information diffusion about our Contact Center and customers, as well as their needs.
- Active member of the Hellenic Institute of Customer Service aiming to continuously share best practices for Customer Service Excellence.

Continuous Improvement

We aim to continuously improve the quality of our customer insights, in order to retain our customer experience. Therefore, in 2019, we:

- Continued monitoring our overall Customer Satisfaction score which is included in our key performance indicators. The score was monitored monthly by the Research Team, aiming to further enhance customers’ overall satisfaction with OPAP. 83% of our customers stated that their experience with OPAP was as they expected it to be or exceeded their expectations.
- Designed a new customer satisfaction study for tzoker.gr, aiming to enhance our understanding of players’ needs. The study was conducted internally in 2019. We will continue to monitor online players’ needs to further improve our online proposition.
- Retained the “Adopt the Shop” attendance score in our key performance indicators for 2019. The score was monitored by the Research Team every quarter and aims to strengthen employees’ engagement with the company’s retail network. The team records employees’ visit rate and their post-event feedback on specific changing quarterly topics (depending on the launches) regarding their experience with the customers, the games, the agency and the agents. More than 90% of our employees participated in the “Adopt a Shop” initiative for almost all quarters of 2019.
- Performed over 150,000 outbound calls to inform and support agents on various issues such as digitalization roll outs, new TORA services and online promotion.



- Transformed the Retail Contact Center support model from “multiskilled” to “Experts” by creating dedicated service lines for the following areas:
 - First level technical support
 - Financial / credit control
 - Play stores commercial
 - TORA services
- Developed the Operational Excellence structure, a cross-functional set up, focused on enhancing our understanding of Customers’ needs, business performance optimization and improving our networks’ daily operations. In 2019, Operational Excellence managed to set up SLAs for more than 1,900 types of issues, deliver 16 critical initiatives for network support and optimize processes for direct and qualitative network feedback.
- Began a journey of CRM transformation that included the implementation of a new campaign and B2C CRM platform, aiming to deliver step change in our CRM capabilities (instant automated offers embedded with artificial intelligence).

Furthermore, in 2019, we organized 2 reward and loyalty programs, as follows:

- **OPAP 1st Reward program for our retail players**

Following Hellenic Gaming Commission’s approval, on 3rd December 2019 we launched OPAP’s 1st Loyalty program, “OPAP Rewards” for our retail players. The program allows OPAP to engage with our retail players, build closer relationship and improve contact effectiveness, by distributing many different and unique prizes via weekly draws.

At the launch phase, more than 2,500 stores were branded all over Greece (our Christmas campaign) and a series of CRM activities took place to notably promote the awareness of the program.

- **OPAP Play loyalty program**

Following the enforcement of GDPR regulation in 2018 enabling OPAP to update loyalty consent from Play games’ customers, 2019 has been the year of loyalty for the registered base of OPAP. For additional information on the program:

[See section F.3.2 Supporting our Network](#)

Monitoring our Customer Service Performance

We monitor our customer service performance aiming for continuous improvement.

As stated above, in 2018 we launched the post-contact satisfaction survey to track satisfaction from the service provided and collect respective feedback. We also conducted monthly market research to measure our agents' and customers' satisfaction from our Contact Center.

Support through the Contact Center in 2019

Source	Agents	Players
Total contacts (inbound, outbound) (number)	1,103,058	384,901
Service Level (contacts answered in 30") (%)	68	67
Abandoned Call Rate (%)	14	16
Post Contact Satisfaction Index (%)	83	61
First Contact Resolution (%)	80	72
Customers' issues solved within 1 day (%)	75	92

Complaints Management

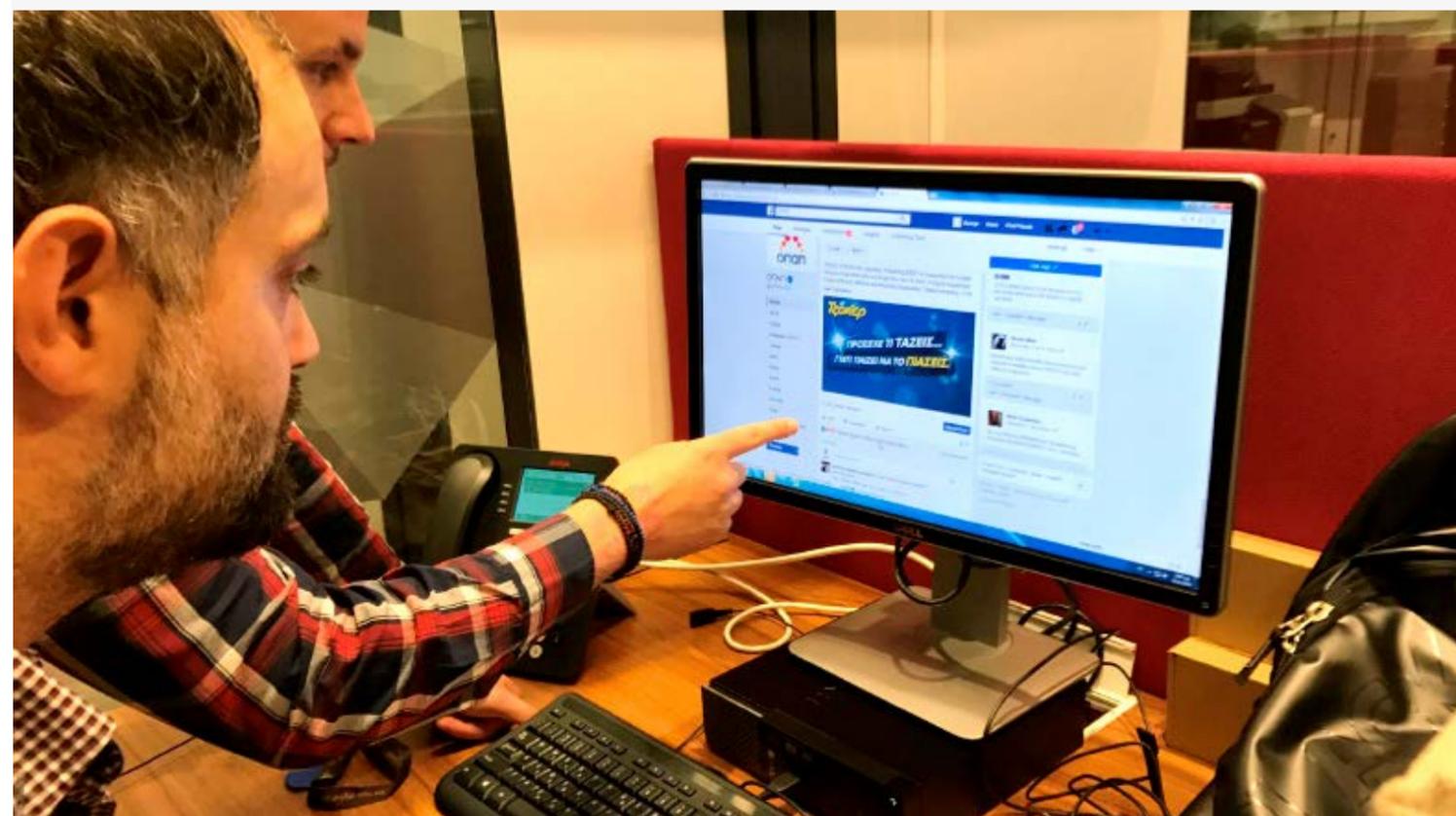
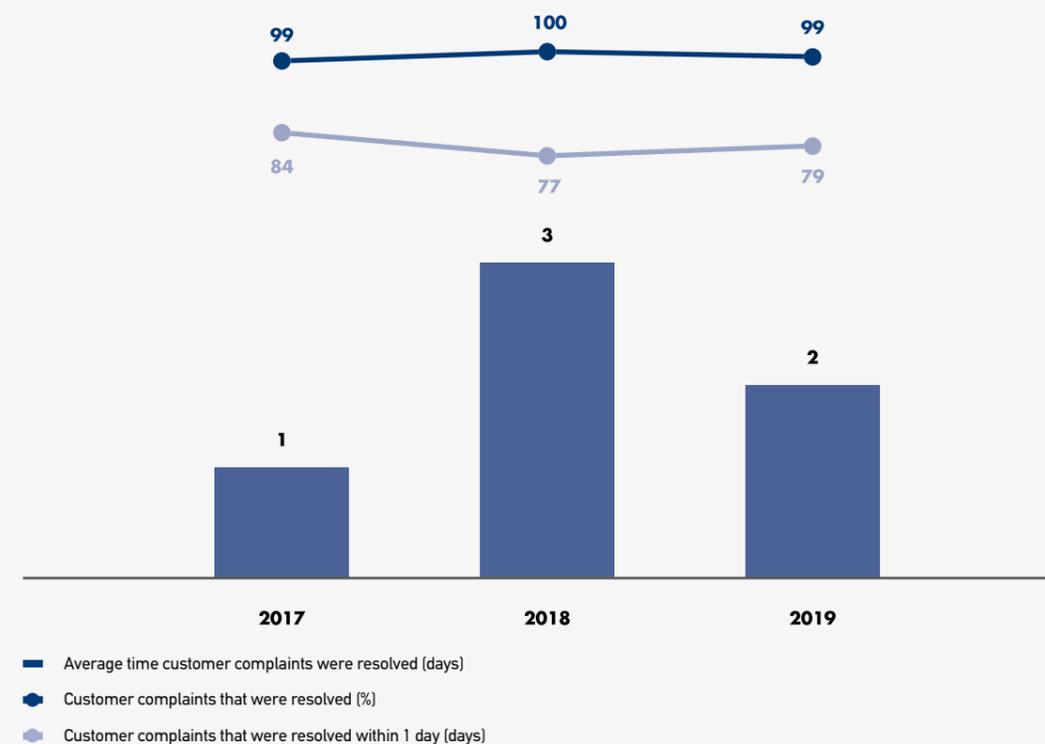
OPAP handles all complaints stated by agents and /or players based on a predefined grievance mechanism characterized by visibility, alerting and reporting mechanisms at every escalation level and status of the complaint. Complaints can be made through our available contact channels (phone, email, web) and are processed by a corporate ticketing system (OTRS) where each complaint receives a unique ID kept throughout its lifecycle. The system also enables the relevant categorization of the complaint thus the priority status and / or targeted closing timeline.

In 2019, through our interactions with players and agents, we received:

- 141,452 complaints, out of which 99% were resolved.
- 47,226 complaints related to advertising and marketing communications or product and service information (e.g. labelling) or product and service use (e.g. VLTs loyalty offers, misprinted slips, errors in terminals).
- 35,250 complaints related to the quality of our products and services.
- 9,012 complaints related to the reliability of our products and services.

In 2019, we solved almost 100% of our customers' complaints. 79% of complaints were solved within a day, dropping the average complaints resolution time to 2 days.

Complaints Management



Achieving Financial Results

Facilitating a sustainable business

Our objective

We seek to align our continuous support to society with healthy and sustainable financial results, in order to facilitate a long-term sustainable business. Therefore, we built our long-term corporate strategy in a transparent way that satisfies the needs of shareholders and the investment community, creates value for all stakeholder groups, contributes to the country's development and economic sustainability, while at the same time strengthens our presence in the gaming industry.

Key achievements in 2019

- € 1,620 million GGR.
- € 412.6 million EBITDA.
- € 57 million utilized in investments.

Key targets for 2020

- Increase revenue stream from online channel.
- Review of the cost base, applying proper mitigation actions to ensure minimum effect by Covid-19 global pandemic.
- Maximization of liquidity, ensuring appropriate cash management.

CHAPTER F.1

In this section

1. Financial Results
2. Financial Statements
3. Economic Value Generated

F. PERFORMANCE AND OUTLOOK

F.1.1. Financial Results

Achieving Healthy and Sustainable Financial Results

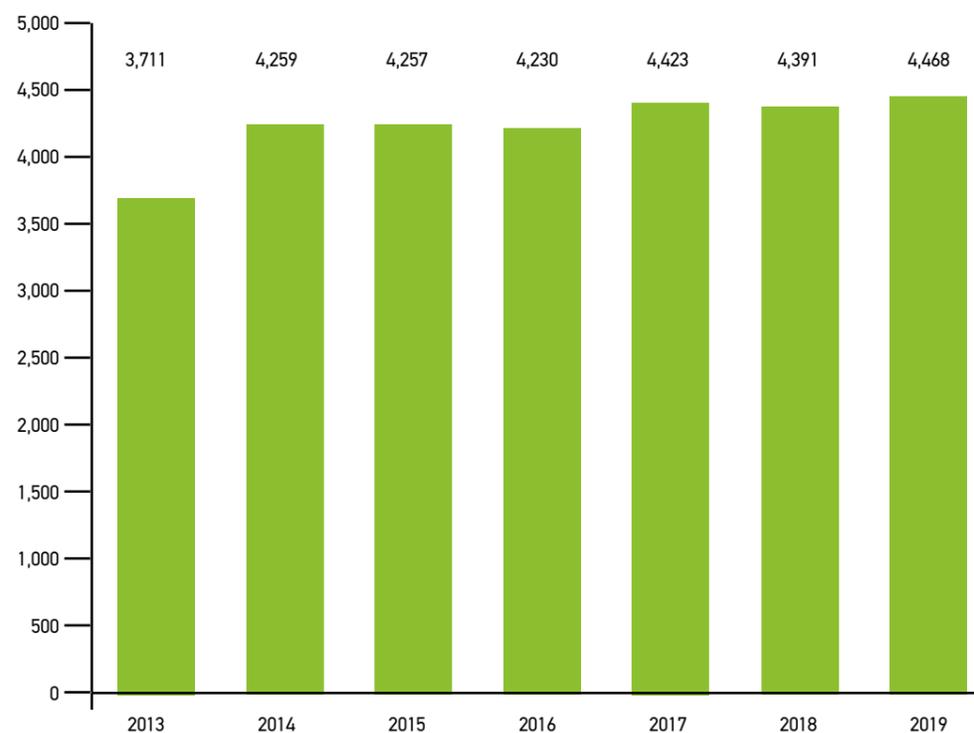
For OPAP, economic development is one of our primary targets since it contributes directly and indirectly to Greece's economic prosperity.

This section presents key consolidated financial figures for the last six years, while additional financial information can be found in our Annual Financial Reports.

OPAP had another strong year in 2019 that was accompanied by increased financial performance in all metrics. In particular:

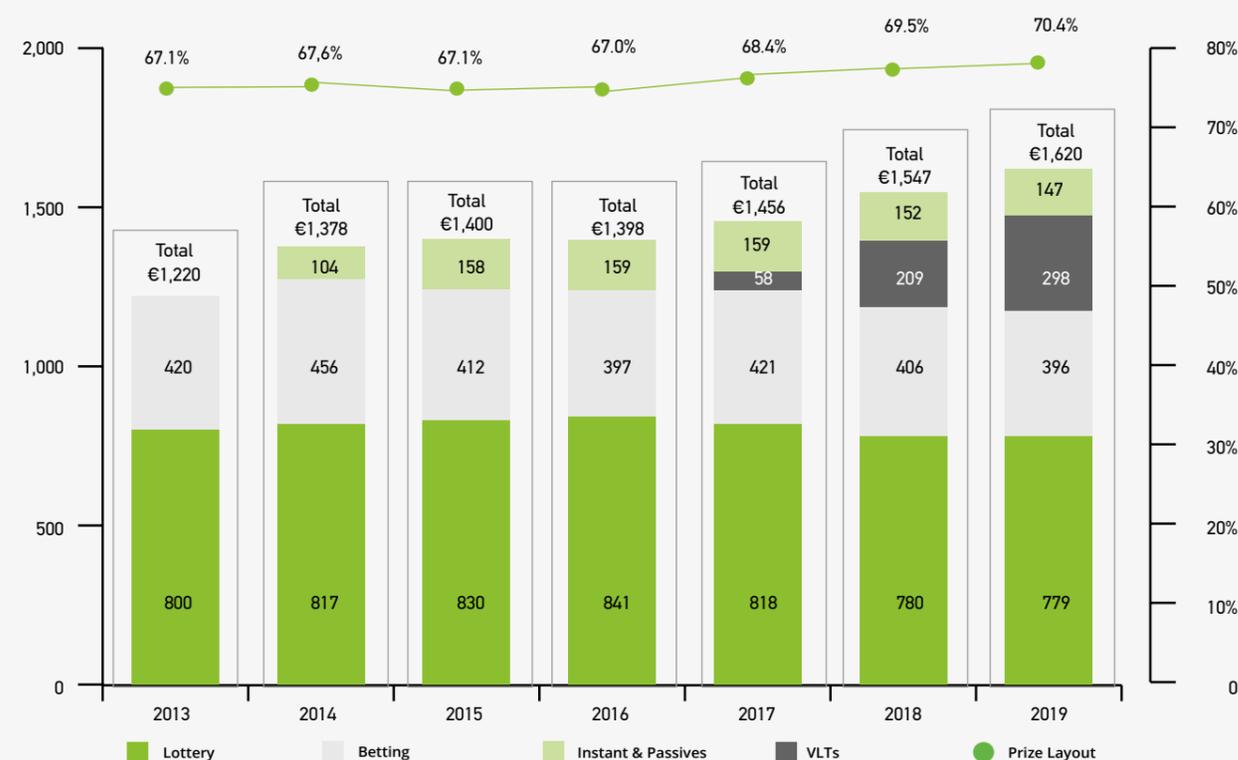
- Gross Gaming Revenue (GGR) increased by 4.7% at € 1,619.9 million (FY 2018: € 1,547.0m), as a result of increased VLTs contribution and sustained sports betting and KINO performance.
- EBITDA increased to € 412.6 million (FY 2018: € 353.7 million), driven by top-line growth, effective cost containment actions as well as significant Stoiximan contribution.
- Net Profit stood at € 202.4 million (FY 2018: € 143.3 million) with a 41.2% year-on-year increase, aided by increased operating profitability and lower effective income tax rate.
- Strong financial standing, with Net Debt at € 408.6 million and Net Debt/EBITDA ratio of 1.0x.

Amounts wagered (€m)



Note: Excluding VLTs

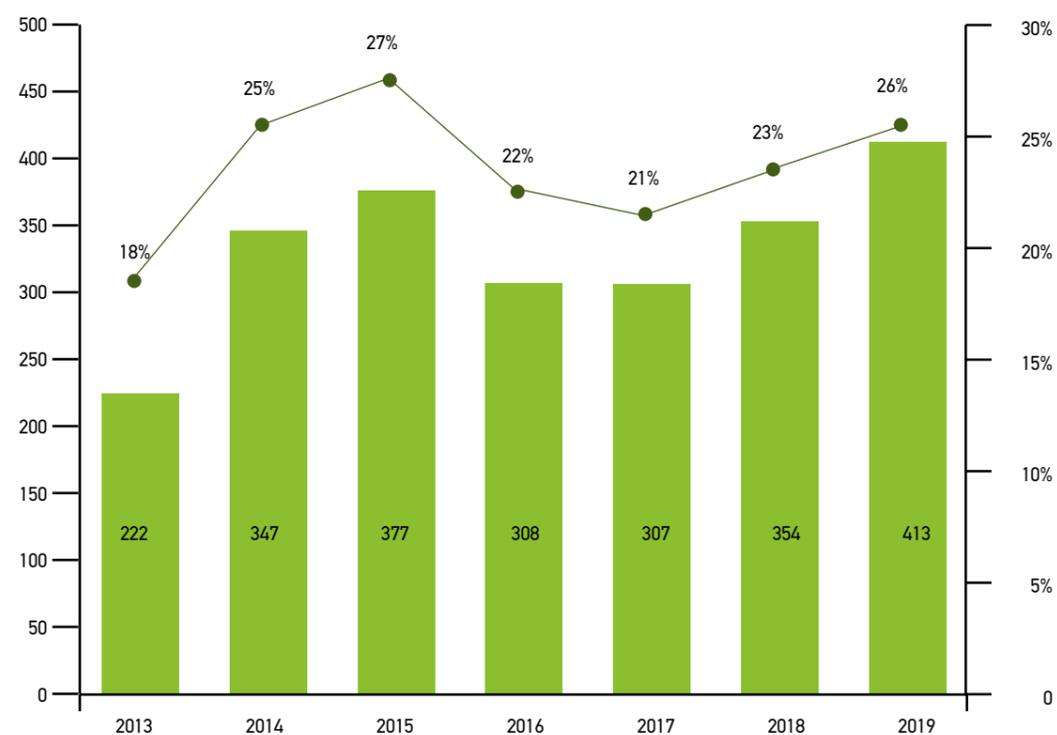
Revenue (GGR) per category & Prize Payout (%)



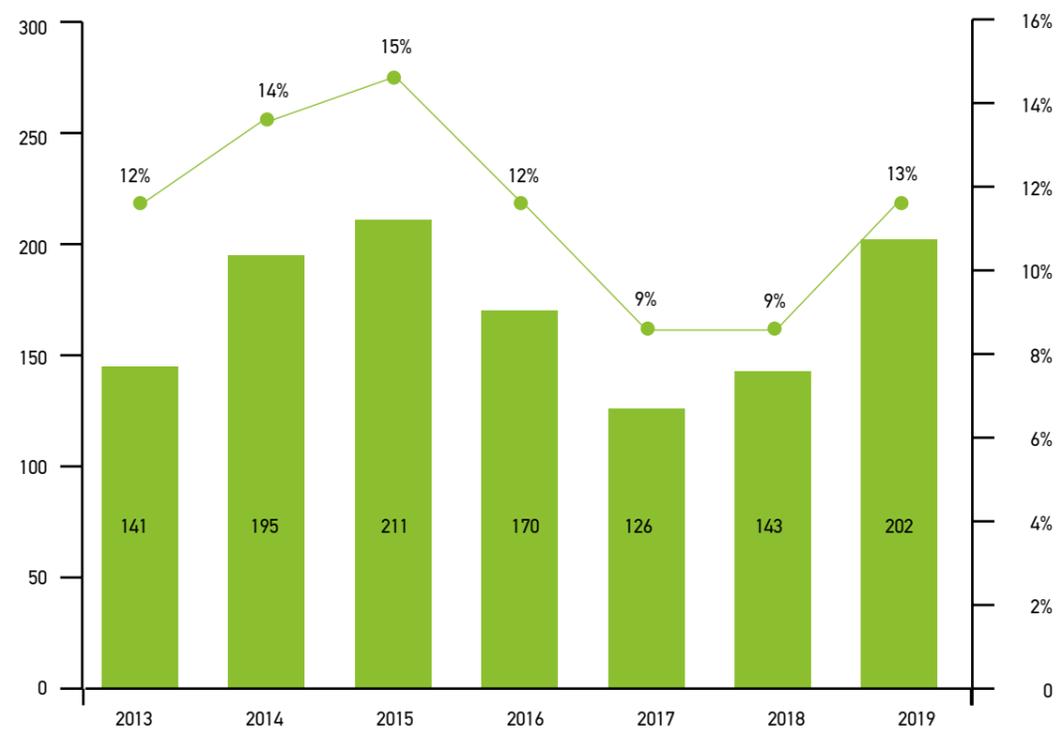
Note: Payout excluding VLTs



EBITDA (€m) & EBITDA margin (%)



Net Profit (€m) & Net Profit margin (%)



Cash flows in thousand euros

(Amounts in thousand euros)	2013	2014	2015	2016	2017	2018	2019
Net cash flows from operating activities	273,874	284,505	198,436	94,301	244,925	253,110	279,330
Net cash flows used in investing activities	-130,181	32,850	-39,067	-52,315	-123,769	-109,447	-49,030
Net cash flows used in financing activities	-269,239	-261,998	-155,093	-70,158	-148,578	-198,442	221,519
Net increase /decrease in cash and cash equivalents	-125,546	55,357	4,276	-28,172	-27,421	-54,779	451,819

Transparently Disclosing Significant Transactions

As part of being transparent in our financial reporting process, we disclose significant transactions within OPAP Group of companies and other related parties (as defined by IAS 24). The amounts of expenses and income undertaken in 2019, and the balances of payables and receivables as at 31.12.2019 for the Group and the company, arising from transactions between related parties are presented in the following tables.

Company's transactions with related parties in thousand euros (eliminated for consolidation purposes)

Company	Expenses / Assets' Purchase	Income	Payables	Receivables
OPAP SERVICES S.A.	5,053	67	-	-
OPAP SPORTS LTD	-	1,500	-	-
OPAP CYPRUS LTD	700	31,138	20,163	15,318
OPAP INVESTMENT LTD	16	-	10,411	-
HELLENIC LOTTERIES S.A.	-	6,126	27	2,985
HORSE RACES S.A.	4	356	10	1,200
TORA DIRECT S.A.	307	330	131	3,705
TORA WALLET S.A.	231	299	113	1,384
NEUROSOFT S.A.	8,525	-	1,361	-

Group's companies' transactions with related companies (not eliminated for consolidation purposes)

Company	Expenses - Assets' Purchases	Payables
(Amounts in thousand euros)		
Related companies	3,532	374



Providing Equal and Transparent Updates to all the Investment Community

We strive to be transparent in our communication with our shareholders. The Investor Relations Team is responsible to manage the interactions and communications with shareholders, institutional investors and financial analysts. The investor relations program includes:

- Regular one-on-one and group meetings with institutional investors
- Presentations of annual and interim financial statements
- Participations in international investor events and roadshows related to either Gaming, Emerging Markets and/or Greece - South Eastern Europe
- Investor conferences

Transaction and balances with Board of Directors members and management personnel

(Amounts in thousand euros)		Group	Company
Category	Description	01.01-31.12.2019	01.01-31.12.2019
Management personnel	Salaries	3,570	3,570
	Other compensations	53	53
	Cost of social insurance	191	191
Total		3,813	3,813

(Amounts in thousand euros)		Group	Company
Category	Description	01.01-31.12.2019	01.01-31.12.2019
Board of directors	Salaries	881	371
	Cost of social insurance	101	65
Total		982	436

(Amounts in thousand euros)		Group	Company
Liabilities from BoD' compensation & remuneration		01.01-31.12.2019	01.01-31.12.2019
BoD and key management personnel		268	176
Total		268	176

It must be noted that:

- From the above, the transactions and balances with the subsidiaries have been eliminated from the consolidated Financial Statements of Group.
- No financial assistance was received from the Greek State within 2019.

Share price and volume in thousand euros



F. PERFORMANCE AND OUTLOOK

F.1.2. Financial Statements

Statement of Financial Position

As of 31 December 2019 and for the year then ended (Amounts in thousands of euro)	Group		Company	
	31.12.2019	31.12.2018*	31.12.2019	31.12.2018*
Non - current assets				
Intangible assets	1,065,733	1,122,920	933,089	972,679
Property, plant and equipment	98,308	111,467	95,138	88,421
Right-of-use assets	64,036	-	32,627	-
Investment properties	1,703	903	1,703	903
Goodwill	30,275	34,275	-	-
Investments in subsidiaries	-	-	362,987	270,725
Investments in associates	54,158	50,089	-	-
Long - term receivables	1,467	2	-	2
Other non - current assets	27,855	47,151	29,290	44,709
Deferred tax assets	19,894	17,359	-	-
Long - term investments	6,630	600	-	-
Total non - current assets	1,370,059	1,384,765	1,454,835	1,377,439
Current assets				
Cash and cash equivalents	633,815	181,996	450,297	101,563
Inventories	6,962	10,662	2,745	1,053
Trade receivables	161,158	140,186	70,905	45,405
Current income tax assets	4,436	-	4,429	-
Other current assets	60,204	46,879	33,259	22,413
Short - term investments	3,285	8,858	-	-
Total current assets	869,860	388,581	561,636	170,434
Total Assets	2,239,918	1,773,347	2,016,471	1,547,873

* The Group has applied IFRS 16 using the modified retrospective approach. Under this approach, the comparative information is not restated.

Statement of Financial Position

As of 31 December 2019 and for the year then ended (Amounts in thousands of euro)	Group		Company	
	31.12.2019	31.12.2018*	31.12.2019	31.12.2018*
Equity				
Share capital	96,487	95,700	96,487	95,700
Share premium	24,294	-	24,294	-
Reserves	31,522	32,212	30,266	30,955
Treasury shares	(14,497)	(14,497)	(14,497)	(14,497)
Retained earnings	615,982	609,339	620,030	605,071
Equity attributable to owners of the Company	753,788	722,754	756,579	717,229
Non-controlling interests	18,104	36,782	-	-
Total equity	771,892	759,536	756,579	717,229
Non-current liabilities				
Loans	1,045,580	650,260	995,301	601,351
Lease liabilities	57,649	-	27,663	-
Deferred tax liability	23,528	15,462	21,015	12,701
Employee benefit plans	2,989	4,807	2,570	4,409
Provisions	8,517	27,015	8,515	26,893
Other non-current liabilities	3,361	2,236	2,524	1,271
Total non-current liabilities	1,141,624	699,779	1,057,588	646,625
Current liabilities				
Loans	6,784	191	20,004	20,011
Lease liabilities	7,130	-	5,157	-
Employee benefit plans	3,578	-	3,578	-
Trade payables	184,054	177,459	76,867	65,168
Current income tax liabilities	1,755	12,785	-	9,571
Other current liabilities	123,101	123,597	96,697	89,270
Total current liabilities	326,403	314,031	202,304	184,019
Total liabilities	1,468,027	1,013,811	1,259,892	830,644
Total Equity & Liabilities	2,239,918	1,773,347	2,016,471	1,547,873

* The Group has applied IFRS 16 using the modified retrospective approach. Under this approach, the comparative information is not restated.

Income Statement

As of 31 December 2019 and for the year then ended (Amounts in thousands of euro)	Group		Company	
	01.01-31.12.2019	01.01-31.12.2018*	01.01-31.12.2019	01.01-31.12.2018*
Amounts wagered	4,468,280	4,390,861	3,722,199	3,644,812
Revenue (GGR)	1,619,896	1,547,015	1,369,923	1,294,097
GGR contribution and other levies and duties	(533,718)	(507,080)	(464,716)	(442,800)
Net gaming revenue (NGR)	1,086,178	1,039,935	905,207	851,297
Agents' commissions	(387,341)	(381,090)	(319,878)	(312,796)
Other NGR related commissions	(76,738)	(60,692)	(61,641)	(44,141)
Other operating income	149,361	128,788	64,754	41,768
Other operating cost	(98,437)	(91,940)	(8,049)	-
Share of profit of associates	8,470	89	-	-
	681,493	635,089	580,394	536,128
Operating expenses	(268,914)	(281,400)	(215,362)	(247,186)
Payroll expenses	(82,306)	(76,052)	(67,974)	(63,471)
Marketing expenses	(60,939)	(63,994)	(46,350)	(46,507)
Other operating expenses	(118,541)	(138,364)	(96,770)	(135,458)
Net impairment losses on financial assets	(7,128)	(2,990)	(4,269)	(1,751)
Profit before interest, tax, depreciation and amortization (EBITDA)	412,579	353,689	365,032	288,942
Depreciation, amortization and impairment	(116,315)	(114,308)	(79,717)	(71,149)
Results from operating activities	296,264	239,381	285,314	217,793
Finance income	3,108	2,887	1,276	1,091
Finance costs	(30,190)	(26,368)	(25,776)	(23,711)
Dividend income	-	-	7,500	4,836
Profit before tax	269,181	215,900	268,315	200,008
Income tax expense	(67,083)	(70,599)	(62,702)	(64,818)
Profit for the period	202,098	145,301	205,612	135,190
Profit is attributable to:				
Owners of the Company	202,381	143,312	205,612	135,190
Non-controlling interests	(283)	1,988	-	-
Profit after tax	202,098	145,301	205,612	135,190
Basic and diluted earnings per share in €	0.6356	0.4511	0.6457	0.4256

* The Group has applied IFRS 16 using the modified retrospective approach. Under this approach, the comparative information is not restated.

Statement of Profit or Loss and other Comprehensive Income

As of 31 December 2019 and for the year then ended (Amounts in thousands of euro)	Group		Company	
	01.01-31.12.2019	01.01-31.12.2018*	01.01-31.12.2019	01.01-31.12.2018*
Profit for the period	202,098	145,301	205,612	135,190
Actuarial gains/(losses)	(221)	(101)	(218)	(127)
Related tax	53	25	52	32
Total items that will not be reclassified to profit or loss	(168)	(77)	(166)	(96)
Loss from valuation of hedging derivatives	(1,253)	(1,057)	(1,253)	(1,057)
Attributable income tax	301	264	301	264
Total items that may be reclassified to profit or loss	(952)	(793)	(952)	(793)
Other comprehensive income/(loss) for the period, net of tax	(1,120)	(870)	(1,118)	(889)
Total comprehensive income/(loss) for the period	200,978	144,431	204,495	134,301
Total comprehensive income is attributable to:				
Owners of the Company	201,258	142,439	204,495	134,301
Non-controlling interests	(280)	1,992	-	-
Total comprehensive income net of tax	200,978	144,431	204,495	134,301

* The Group has applied IFRS 16 using the modified retrospective approach. Under this approach, the comparative information is not restated.



Statement of Changes in Equity

A) Consolidated Statement of Changes in Equity

As of 31 December 2019 and for the year then ended (Amounts in thousands of euro).

Attributable to owners of the Company

GROUP	Share capital	Share premium	Reserves	Treasury shares	Retained earnings	Total	Non-controlling interests	Total equity
Balance at 1 January 2018*	95,700	-	32,882	(9,039)	595,168	714,711	44,752	759,463
Profit for the period	-	-	-	-	143,312	143,312	1,988	145,301
Other comprehensive income/(loss)	-	-	(793)	-	(80)	(873)	4	(870)
Total comprehensive income for the period	-	-	(793)	-	143,232	142,439	1,992	144,431
Transactions with owners of the Company								
Acquisition of treasury shares (Note 21)	-	-	-	(5,458)	-	(5,458)	-	(5,458)
Share capital increase expenses of subsidiaries	-	-	-	-	(301)	(301)	(69)	(370)
Share capital decrease of subsidiary	-	-	-	-	-	-	(6,261)	(6,261)
Other movements	-	-	-	-	(1,539)	(1,539)	-	(1,539)
Reserves of subsidiaries	-	-	122	-	(122)	-	-	-
Dividends provided for or paid	-	-	-	-	(127,098)	(127,098)	(3,632)	(130,730)
Total transactions with owners of the Company	-	-	122	(5,458)	(129,060)	(134,396)	(9,961)	(144,357)
Balance at 31 December 2018	95,700	-	32,212	(14,497)	609,340	722,754	36,782	759,536
Balance at 1 January 2019*	95,700	-	32,212	(14,497)	609,340	722,754	36,782	759,536
Profit for the period	-	-	-	-	202,381	202,381	(283)	202,098
Other comprehensive income/(loss)	-	-	(952)	-	(171)	(1,123)	3	(1,120)
Total comprehensive income for the period	-	-	(952)	-	202,210	201,258	(280)	200,978
Transactions with owners of the Company								
Share capital increase (Note 19)	787	24,294	-	-	-	25,081	-	25,081
Share capital increase expenses	-	-	-	-	(97)	(97)	-	(97)
Statutory reserve (Note 20)	-	-	262	-	(262)	-	-	-
Dividends provided for or paid (Notes 29 & 22)	-	-	-	-	(190,302)	(190,302)	(3,304)	(193,607)
Total transactions with owners of the Company	787	24,294	262	-	(190,661)	(165,318)	(3,304)	(168,623)
Changes in ownership interests								
Acquisition of NCI without a change in control (Note 22)	-	-	-	-	(4,906)	(4,906)	(15,094)	(20,000)
Total changes in ownership interests	-	-	-	-	(4,906)	(4,906)	(15,094)	(20,000)
Balance at 31 December 2019	96,487	24,294	31,522	(14,497)	615,983	753,788	18,104	771,892

* The Group has applied IFRS 16 using the modified retrospective approach. Under this approach, the comparative information is not restated.

B) Separate Statement of Changes in Equity

As of 31 December 2019 and for the year then ended (Amounts in thousands of euro).

COMPANY	Share capital	Share premium	Reserves	Treasury shares	Retained earnings	Total equity
Balance at 1 January 2018*	95,700	-	31,748	(9,039)	598,614	717,023
Profit for the period	-	-	-	-	135,190	135,190
Other comprehensive income/(loss)	-	-	(793)	-	(96)	(889)
Total comprehensive income for the period	-	-	(793)	-	135,094	134,301
Acquisition of treasury shares (Note 21)	-	-	-	(5,458)	-	(5,458)
Other movements	-	-	-	-	(1,539)	(1,539)
Dividends provided for or paid	-	-	-	-	(127,098)	(127,098)
Balance at 31 December 2018	95,700	-	30,955	(14,497)	605,071	717,229
Balance at 1 January 2019*	95,700	-	30,955	(14,497)	605,071	717,229
Profit for the period	-	-	-	-	205,612	205,612
Other comprehensive income/(loss)	-	-	(952)	-	(166)	(1,118)
Total comprehensive income for the period	-	-	(952)	-	205,447	204,495
Share capital increase (Note 19)	787	24,294	-	-	-	25,081
Merger with OPAP SERVICES S.A. (Note 11)	-	-	-	-	86	86
Statutory reserve (Note 20)	-	-	262	-	(262)	-
Share capital increase expenses	-	-	-	-	(9)	(9)
Dividends provided for or paid (Note 29)	-	-	-	-	(190,302)	(190,302)
Balance at 31 December 2019	96,487	24,294	30,266	(14,497)	620,030	756,579

* The Group has applied IFRS 16 using the modified retrospective approach. Under this approach, the comparative information is not restated.

Cash Flow Statement

As of 31 December 2019 and for the year then ended (Amounts in thousands of euro)	GROUP		COMPANY	
	01.01-31.12.2019	01.01-31.12.2018*	01.01-31.12.2019	01.01-31.12.2018*
Profit before tax	269,181	215,900	268,315	200,008
Adjustments for:				
Depreciation & Amortization	107,666	96,767	79,717	71,149
Net finance costs	27,054	23,449	16,987	17,772
Employee benefit plans	1,649	1,573	1,594	1,501
Provisions for bad debts	2,299	2,990	2,024	1,751
Write-off of trade receivables	1,132	-	1,068	-
Other provisions	(16,079)	(1,823)	(16,082)	(1,789)
Provision for obsolete inventories	1,160	-	1,160	-
Impairment losses on intangible assets & goodwill	8,650	17,541	-	-
Exchange differences	29	32	12	13
Impairment of investment in subsidiary	-	-	8,336	27,202
Impairment of other current assets	4,712	-	2,245	-
Share of profit from associates	(8,470)	(89)	-	-
(Profit)/loss from investing activities	25	(34)	(2)	(34)
Other non-cash items	69	-	2,755	2,755
Total	399,077	356,307	368,129	320,327
Changes in Working capital				
(Increase) / decrease in inventories	2,540	(2,742)	8,199	875
(Increase) / decrease in receivables	(34,162)	(19,513)	(18,412)	4,039
Increase / (decrease) in payables (except banks)	12,936	(17,107)	2,677	(37,281)
Increase in taxes payable	2,162	14,394	2,261	15,648
Total	382,552	331,338	362,854	303,608
Interest paid	(24,273)	(26,555)	(21,754)	(23,813)
Income taxes paid	(78,949)	(51,674)	(69,966)	(43,724)
Net cash inflow from operating activities	279,330	253,110	271,133	236,071
Proceeds from sale of tangible & intangible assets	61	55	41	53
Additional consideration for the acquisition of associate & subsidiary	(22,000)	(48,000)	-	-
Loan repayments from third parties	3,956	5,106	651	3,382
Loan repayments from subsidiaries	-	-	6,000	700
Share capital increase of subsidiaries	-	-	(123,000)	(15,982)
Loans granted to third parties	(2,191)	(16,290)	-	-
Loans granted to Group companies	-	-	(6,100)	(750)
Increase of cash due to merger of OPAP SERVICES S.A.	-	-	3,268	-
Purchase of intangible assets	(25,482)	(30,154)	(18,206)	(28,263)
Purchase of property, plant and equipment	(9,297)	(21,968)	(8,144)	(15,551)
Dividends received	4,400	-	1,500	4,836
Interest received	1,978	1,935	1,026	740
Net change in short-term & long-term investments	(456)	(131)	-	-
Net cash outflow from investing activities	(49,030)	(109,447)	(142,964)	(50,835)

	GROUP		COMPANY	
	01.01-31.12.2019	01.01-31.12.2018*	01.01-31.12.2019	01.01-31.12.2018*
Proceeds from loans & borrowings	451,600	260,180	450,000	270,000
Payments of loans & borrowings	(50,098)	(290,752)	(56,048)	(290,661)
Transaction costs related to loans & borrowings	(1,765)	(1,750)	(1,765)	(1,425)
Acquisition of treasury shares	-	(5,458)	-	(5,458)
Share capital increase expenses	(97)	(370)	(9)	-
Share capital return of subsidiaries	-	(6,261)	-	-
Payment of lease liabilities	(9,681)	-	(6,478)	-
Dividends paid	(168,440)	(130,731)	(165,136)	(127,099)
Tax on prior year dividends	-	(23,300)	-	(23,300)
Net cash inflow/(outflow) from financing activities	221,519	(198,442)	220,565	(177,943)
Net decrease in cash and cash equivalents	451,819	(54,779)	348,734	7,293
Cash and cash equivalents at the beginning of the period	181,996	236,775	101,563	94,270
Cash and cash equivalents at the end of the period	633,815	181,996	450,297	101,563

* The Group has applied IFRS 16 using the modified retrospective approach. Under this approach, the comparative information is not restated.



Operating Segments

As of 31 December 2019 and for the year then ended.

GROUP 01.01-31.12.2019	Lotteries	Sports Betting	Instant & Passives	VLTs	Telecommunication & eMoney services	Other	Total
Revenue (GGR)	778,558	396,203	147,478	297,658	-	-	1,619,896
GGR contribution and other levies and duties	(257,704)	(135,959)	(50,758)	(89,297)	-	-	(533,718)
Net gaming revenue (NGR)	520,854	260,244	96,720	208,361	-	-	1,086,178
Agents' commission	(183,930)	(92,429)	(39,149)	(70,585)	-	(1,248)	(387,341)
Other NGR related commission	(111)	(17,989)	(12,843)	(45,795)	-	-	(76,738)
Other operating income	-	1,404	61	-	94,642	53,254	149,361
Other operating cost	-	-	-	-	(85,090)	(13,347)	(98,437)
Share of profit of associates	-	8,470	-	-	-	-	8,470
	336,812	159,700	44,789	91,981	9,553	38,659	681,493
Operating expenses	(112,315)	(62,916)	(14,715)	(42,216)	(10,603)	(26,148)	(268,914)
Depreciation, amortization and impairment	(24,836)	(21,785)	(16,807)	(41,653)	(301)	(10,933)	(116,315)
Results from operating activities	199,660	74,998	13,267	8,112	(1,351)	1,578	296,264
GROUP 01.01-31.12.2018	Lotteries	Sports Betting	Instant & Passives	VLTs	Telecommunication & eMoney services	Other	Total
Revenue (GGR)	779,944	406,244	152,168	208,659	-	-	1,547,015
GGR contribution and other levies and duties	(259,123)	(139,710)	(45,651)	(62,598)	-	-	(507,080)
Net gaming revenue (NGR)	520,821	266,535	106,518	146,061	-	-	1,039,935
Agents' commission	(190,194)	(98,778)	(40,597)	(50,135)	-	(1,387)	(381,090)
Other NGR related commission	(308)	(14,936)	(14,413)	(31,035)	-	-	(60,692)
Other operating income	-	1,151	75	-	89,721	37,840	128,788
Other operating cost	-	-	-	-	(81,923)	(10,017)	(91,940)
Share of profit of associates	-	89	-	-	-	-	89
	330,320	154,061	51,583	64,891	7,798	26,436	635,089
Operating expenses	(125,710)	(74,226)	(17,009)	(33,490)	(8,879)	(22,086)	(281,400)
Depreciation and amortization	(22,072)	(14,622)	(17,444)	(37,017)	(260)	(22,893)	(114,308)
Results from operating activities	182,537	65,213	17,130	(5,616)	(1,342)	(18,542)	239,381

Geographical Segments

Group's operations are in Greece and Cyprus. Greece is the country of incorporation of the Company and of the subsidiaries OPAP SERVICES S.A., HELLENIC LOTTERIES S.A., HORSE RACES S.A., TORA DIRECT S.A., TORA WALLET S.A. and NEUROSOFT S.A.

For the year that ended on 31 December 2019	Greece	Cyprus	Total
Amounts wagered	4,176,694	291,586	4,468,280
Revenue (GGR) and Other operating income	1,672,827	96,430	1,769,257
Net gaming revenue (NGR)	1,007,916	78,262	1,086,178
Segment Assets	2,002,853	237,066	2,239,918
Segment Liabilities	1,442,064	25,963	1,468,027

For the year that ended on 31 December 2018	Greece	Cyprus	Total
Amounts wagered	4,111,785	279,076	4,390,861
Revenue (GGR) and Other operating income	1,583,926	91,877	1,675,803
Net gaming revenue (NGR)	964,356	75,579	1,039,935
Segment Assets	1,654,579	118,767	1,773,347
Segment Liabilities	986,008	27,803	1,013,811



F. PERFORMANCE AND OUTLOOK

F.1.3. Economic Value Generated

Distributing Significant Economic Value Generated to our Stakeholders

We seek to create economic value not only for our shareholders, but also for our other stakeholders, as it is particularly important during the current challenging economic situation. We are committed to utilizing the positive value generated by our business to benefit different stakeholders. Therefore, our turnover ensures that we return significant financial resources back to society, towards our players (through pay-out to lottery and betting winners), our network (through a commission-based agents' agreement), our shareholders (through dividends), our suppliers (through purchases), our employees (through wages, benefits and insurance payments), providers of capital (through interest paid for loans), the Hellenic Republic (through its participation in GGR, corporate taxes and other taxes and duties) and investments. Within 2019, OPAP Group:

- Paid out over € 2,848 million to players.
- Distributed over € 387 million to its network.
- Distributed over € 168 million to its shareholders.
- Paid over € 245 million to suppliers (excluding investments).
- Distributed over € 79 million for employees.
- Paid over €24 million to providers of capital.
- Paid over € 744 million to the Hellenic Republic, out of which € 511 million were GGR contribution and € 77 million were corporate taxes.
- Utilized c. € 57 million in investments.

Economic Value Distribution (in €M)



*Amount refers to wages, benefits and insurance payments.

**Amount refers to the Hellenic Republic's participation in GGR, corporate taxes and other taxes and duties.

***excluding investments.

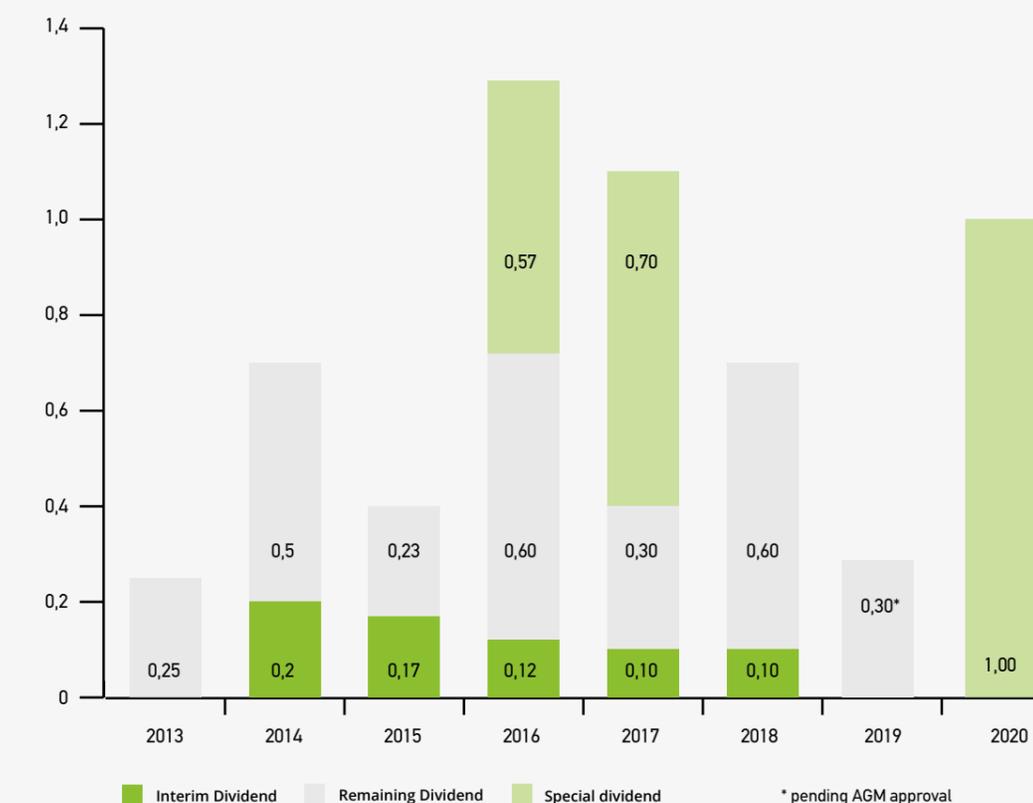
An important parameter that illustrates our commitment to create economic value for our stakeholders as well as our transparent practices, is our obligation to return undistributed winnings of players (amounts from winning tickets that were never collected), along with the rounding up of winnings in every winning category, back to the Hellenic Republic.

Specifically, the undistributed winnings for 2019 (as registered in the financial statements on 31.12.2019) were € 15 million, compared to € 18.3 million in 2018.

Our dividend policy remained aligned with our principle to distribute the bulk of our Free Cash Flow excluding any investments. It must be noted that:

- The total remaining gross dividend per share (DPS) paid for the fiscal year 2018 was € 0.70. For the fiscal year 2019, it has been proposed to the AGM, scheduled for 25 June 2020 and DPS of 0.30. It is noted that in February 2020 a special dividend of € 1.00 per share has already been distributed.
- Earnings per share (EPS) in 2019 were approximately € 0.64, compared to approximately € 0.45 in 2018.

Dividend distribution



	2013	2014	2015	2016	2017	2018	2019
Dividend per share (€)	0.25	0.70	0.40	1.29	1.10	0.70	0.30
Dividend payout (%)	59.6	112.4	60.5	241.4	277.0	155.2	47.2

Protecting our Players

Establishing a safe gaming experience

Our objective

We understand that the responsible management of our business is imperative, due to the possible risks and consequences that might arise from excessive participation in games of chance. Therefore, we seek to establish an environment, in which a fair, reliable and safe gaming experience is provided to those who choose to use the products and services offered by our company, for their own entertainment.

Key achievements in 2019

- Strengthened the communication strategy of Responsible Gaming to ensure players understand how to play responsibly.
- Empowered agents to detect and handle problematic playing behavior.
- Maintained high Responsible Gaming standards in everything we do.

Key targets for 2020

- Provide more Responsible Gaming tools to our players on our online platform (pamestoixima.gr).
- Enhance OPAP Group Responsible Gaming tools in the new online regime.
- Revamp the Responsible Gaming communication strategy to ensure players understand rules and believe in OPAP's commitment to keeping them safe.

CHAPTER F.2

In this section

1. Responsible Gaming
2. Draw Credibility and Data Security

Our progress against 2019 targets

75%
ACHIEVED

25%
IN PROGRESS



ΜΠΟΡΕΙ ΝΑ ΣΟΥ ΑΛΛΑΞΕΙ ΤΗ ΖΩΗ

F.PROTECTING OUR PLAYERS

F.2.1. Responsible Gaming

Our Strategic Approach

Our Responsible Gaming Framework is based on the World Lottery Association's (WLA) framework and consists of activities that aim to ensure responsible and sustainable growth.



Within this Framework, we have developed Responsible Gaming Policies, as follows:

- OPAP / Hellenic Lotteries Employee Policy on Responsible Gaming.
- OPAP Agents / Hellenic Lotteries Points of Sale Network Policy on Responsible Gaming.
- OPAP / Hellenic Lotteries Communication and Advertising Policy on Responsible Gaming.
- OPAP Play Gaming Hall Network Policy on Responsible Gaming.

Responsible Gaming Framework

These policies define all the necessary measures that companies are advised to take in order to minimize the potential negative impact from participation in games of chance. The policies address three main target groups:

- Employees
- Agents and Play stores venue managers / Points of Sale and their employees
- Players

Expanding our responsibility practices into our sphere of influence, all of our agencies are required to neither employ any person below the legal work age limit, nor to tolerate or disregard potential physical or other illegal harassment of any kind or forced and coercive labor in any of their facilities.

INTERNATIONAL CERTIFICATION FOR RESPONSIBLE GAMING

In 2018, two international associations awarded us (OPAP S.A. and Hellenic Lotteries S.A.) with the highest distinctions globally for our commitment in protecting consumers and ensuring a safe environment for our players. In particular, WLA awarded us with the WLA Responsible Gaming Certificate Level 4, which is the highest level of Responsible Gaming Certification globally, moving forward from the Level 3 certification we received in 2015.

In addition, the European State Lotteries and Toto Association/ European Lotteries (EL) awarded us with the Statement of Alignment with the EL Responsible Gaming Standards for our true dedication to consistently applying Responsible Gaming principles in our strategy and operation.

All certifications are valid until 2021. These certifications serve as a testament to the effectiveness of our Responsible Gaming programs and the benefit they bring to all our stakeholders towards safeguarding the joy of the game.





Educating our Employees on Responsible Gaming Practices

We inform, educate and engage with our employees on Responsible Gaming, in order to ensure their compliance with the respective principles and rules, as defined through our policies and practices. All of our employees have been informed about our Responsible Gaming strategy through internal awareness campaigns, where basic rules of Responsible Gaming as well as our respective achievements were addressed. Indicatively, within 2019, we:

- Briefed and trained all our employees on responsible gaming, covering topics such as the protection of minors and excessive playing. In 2019, we revised the content of the induction training from the previous year's version, to ensure all information is fully up to date. We informed our new employees about our Responsible Gaming Policy, with material that is also available on the company's intranet site. In 2019 we redesigned the Responsible Gaming section of our company's intranet and updated the content to make it more attractive and useful to employees.
- Offered a mandatory online training course on OPAP's Responsible Gaming strategy, priorities and related regulatory framework to all employees. The online training content was updated in 2019.
- Conducted specialized training sessions in Responsible Gaming to frontline employees, in collaboration with KETHEA.
- Offered our employees and senior management the opportunity to learn more about addiction by hosting a session with two former gambling addicts who shared their personal testimonies with us.

Ensuring our Network's Commitment to Responsible Gaming

Our contractual agreements with all our sales agents include a number of clauses, which refer to their responsible operation. We operate two dedicated sections on Responsible Gaming and Corporate Responsibility in the opapnet, opapnet|play and opapnet|laheia portals, which are available to our network. In addition, we have distributed the Hellenic Lotteries Points of Sale Network Policy on Responsible Gaming to all distributors of instant win games and passive lotteries tickets.

Our agents are obliged to comply with "The protection of the Greek society from addiction to games of chance, the protection of minors and the protection of the consumer". Non-compliance with the principles and rules of responsible operation constitutes a reason to impose penalties (ranging from a warning to termination of the agency's agreement).

We inform our agents and PLAY stores operators about the requirements of responsible operation and we make sure that they comply with OPAP's principles and rules.

TRAINING ON RESPONSIBLE GAMING

In 2019, 100% of OPAP's sales agents were briefed and trained on Responsible Gaming respectively. All new agents were trained on Responsible Gaming. More specifically, we:

- Trained 580 agents and agents' employees (including all 512 new agents and their employees), 650 PLAY stores operators and their employees and 65 Points of Sale's personnel (wholesalers and distributors to cascade training to Point of Sale such as kiosks, mini markets and supermarkets) on responsible operation.
- Updated the e-learning training course on Responsible Gaming for our agents, with over 1,692 agents and agents' employees trained.
- Developed a dedicated Responsible Gaming module for agent's VLTs training resulting in over 951 agents, store operators and employees in agencies with installed VLTs trained.
- Trained 313 wholesalers, distributors and street vendors on Responsible Gaming rules and principles.
- Communicated Responsible Gaming messages to all agents, wholesalers and street vendors.
- Uploaded announcements about Responsible Gaming on portals, the dedicated online communication platforms (opapnet, opapnet|play and opapnet|laheia) for agents and staff of OPAP stores, PLAY stores and Hellenic Lotteries partners and points of sale respectively.

Agents, PLAY stores venue managers and their employees are trained to identify a player's problematic behavior, as well as provide advice to mitigate the consequences of excessive playing and suggest relevant treatment referral providers.

MONITORING NETWORK'S RESPONSIBLE GAMING PRACTICES AND PERFORMANCE

Indicating our commitment to ensure proper compliance with the Responsible Gaming rules and principles, we monitor our agencies' and Play stores' compliance with the basic rules of Responsible Gaming. Compliance with the Responsible Gaming rules is assessed through the FOT's Mystery Shopping visits ([see section E.3.4 Addressing Illegal Gaming](#)), where the following aspects, among others, are inspected:

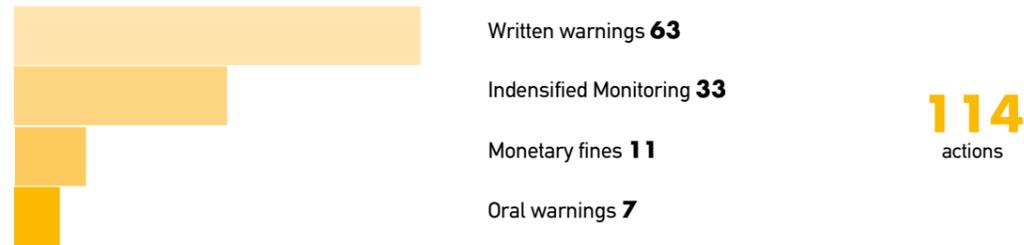
- Entry of minors in agencies and under 21-years of age in PLAY stores.
- Minors' participation in games of chance (under 21 years of age for PLAY games).
- Presence of Responsible Gaming mandatory materials.

In case agents are identified as being non-compliant with their obligations in the above areas, OPAP reserves the right to terminate their agreement.

During 2019, we performed 1,672 unique shop visits to our network (approximately 40% of our network), where 66 cases of high severity violations on behalf of our agents regarding their responsible operation were reported, which led to a total of 114 actions from OPAP, including monetary fines.



Remedial actions taken for high severity Responsible Gaming violations*



* High severity Responsible Gaming violations refer to underage/self-excluded persons' participation in games.

INFORMING OUR PLAYERS TO ENSURE THEIR PROTECTION

The cornerstone of our Responsible Gaming initiatives is our players, hence our efforts to provide all necessary information related to our games, enabling them to decide for themselves if they will play and how to play, according to their personal choices and circumstances.

65%

of people believe that OPAP "promotes responsible participation in games for money"

90%

of people are aware that participation in OPAP's games of chance is allowed only for people over the age of 18. It is our intention to increase this percentage even further until it reaches 100%.

87%

of people accept the company as a part of society

92%

of people are aware that in OPAP's games of chance one should play within limits.

36%

of people are not aware that entrance in OPAP agencies is not allowed to adults who accompany minors. This further encourages our commitment to continue educating the public around Responsible Gaming, including agencies, and especially targeting middle age and older adults.

Source: OPAP 2019 surveys.

"OUTSIDE THE LINES, THERE IS NO GAME" CAMPAIGN

In 2019, we continued our informational campaign "Outside the lines, there is no game" within our network and on the internet, which reaffirms our commitment to create a safe environment for players and protect minors and sensitive social groups. The campaign's objective is to sensitize and raise awareness among players and the general public about the two basic rules of Responsible Gaming:

- Don't exceed your limits.
- Don't play unless you're at least 18 years old.

REMOTE GAMING CHANNELS (ONLINE GAMING)

We monitor players' participation in online gaming for OPAP S.A.'s games conformity with the applicable legal and regulatory framework in force including the current online sports betting regulation. Indicatively:

- We provide all necessary information on game odds in our gaming website www.pamestoixima.gr.
- We only allow people above 21 years old to register and use our gaming website. We request the necessary documentation to verify their personal data within 30 days (in case personal data are not submitted within 30 days, the player's account closes).
- We allow only one account per user and we always verify a player's email address, prior to verifying his/her electronic account.
- We inform self-excluded players about treatment referral.
- We maintain a record of players who want temporary or permanent exclusion from online participation (players provide an explicit consent to be registered in such records) and do not allow said players to register with a new account or connect to the gaming system.

In addition, we allow players to:

- Regulate their gaming experience, as they can apply playing limits of their choice to participate in our online gaming services (e.g. set the maximum amounts that can be deposited per day, week or month, set their maximum betting amount per day).
 - Request for a temporary or permanent exclusion from participating in online gaming (temporary exclusion cannot be valid for a period of less than one month and in permanent exclusion players can re-register after their accounts have been closed for one year), with OPAP deactivating their accounts.
- It must be noted that a maximum deposit amount of €800 per player is set by law, which no player can exceed before their verification.

OPAP monitors the operation of online players' accounts and in cases of infringement of the concession agreement, OPAP proceeds with closing said accounts.

VIDEO LOTTERY TERMINALS (VLTs)

Due to the launch of VLTs, we have included aspects related to the VLTs in the Responsible Gaming framework for OPAP S.A., conforming with the provisions of the applicable legal and regulatory framework in force. Indicatively, we:

- Allow operation of PLAY stores in specific operating hours.
- Prohibit installation of ATM machines inside or in front of PLAY stores.
- Require that all PLAY stores follow specific requirements regarding signing and labeling stickers
- Require the use of a strictly personal Individual Player Card, which includes information about the player's spending and frequency, in order to set their playing limits.
- Prohibit employees, partners and operators from playing VLTs games at their own premises.
- Require players to present an identity document with a photo and date of birth (e.g. identity card, driver's license or any other similar official document) every time they are about to enter a PLAY store or the dedicated VLTs area within an agency.
- Integrate playing behavior control mechanisms to VLTs, by setting time and spending limits and warning messages to the player reaching these limits.
- Record extreme incidents and problematic behaviors.
- Include self-exclusion options (either for a 6-month period or permanent) to prevent participation in VLTs, which cannot be revoked for a 6-month time period.
- Prohibit entry to PLAY stores or participation in games to individuals who show signs that they are under the influence of alcohol or other addictive substances or sleepiness or whose physical and mental condition cannot guarantee the conduct of Responsible Gaming.
- Provide information about support and treatment to players and their families in cases of excessive participation.
- Ensure the availability of informational material with clear instructions on the rules governing the games and information on the winning chances for each game.

The above requirements are mandatory for all partners and operators in PLAY stores and agencies with VLTs, along with their employees. We continuously monitor the network's compliance with our Responsible Gaming framework and proceed with proactive or remediating actions, if deemed necessary.

INSTORE COMMUNICATION

We comply with all legal labeling requirements to inform the general public, players and their relatives, as indicated below:

- We updated the door sticker on the doors of our agencies to ensure customers are aware that minors, as well as adults accompanying minors, are not allowed to enter. We also created a new handout for points of sale to emphasize the related regulation and OPAP's commitment to its implementation.
- All our agencies and PLAY stores have clear labeling stickers, which indicate that participating in games is only allowed to players above 18 and 21 years of age respectively and encourage players to play within their limits.
- All our agencies and Play stores distribute information material regarding Responsible Gaming and operate a Responsible Gaming information point, where people can ask questions about Responsible Gaming.
- All advertising material and commercial advertisements for games include relevant labeling with the Responsible Gaming logo, the regulator, the legal age limit, the KETHEA- ALFA helpline number (1114), as well as the adverse consequences that may occur from irresponsible participation in games of chance.
- All relevant game guides are accessible by players and include Responsible Gaming messages, as well as information on game odds, age restrictions, the regulator, prohibition of selling on credit and the dedicated helpline.
- All our above-the-line campaigns (including TV and radio spots, as well as print campaigns) carry the Hellenic Gaming Commission's disclaimer.
- Extensive information on Responsible Gaming is available through our corporate website, our dedicated Responsible Gaming website and on every game's website.
- Posters are located in all of our agencies and Play stores to inform players about the basic rules of Responsible Gaming.

PLAYER SELF-CHECK

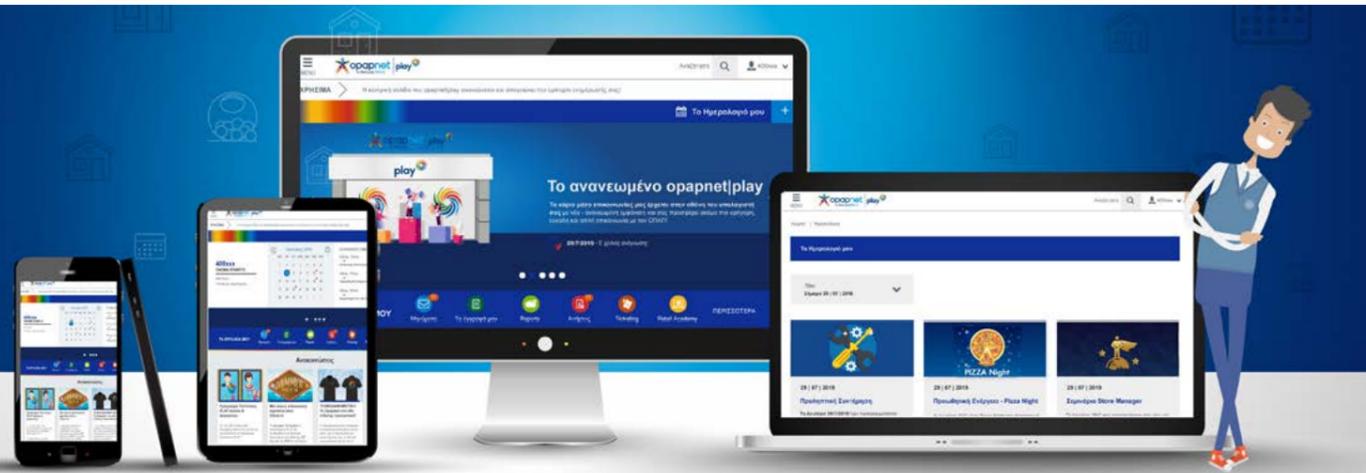
We have developed a self-assessment questionnaire, based on the Canadian Problem Gambling Index, in order to help players identify if they are experiencing any issue with excessive play. An interactive version of the questionnaire is also available at our [website](#), featuring nine easily understandable questions, as well as virtual characters and animations. Upon completing the questionnaire, the player receives an overall score, which indicates the level of control the player has when playing.

WEBSITE INFORMATION

We have created a dedicated section on Responsible Gaming in our Corporate Responsibility [website](#), which provides Responsible Gaming information to the general public. Similarly, Responsible Gaming messages and relevant information have been incorporated in all company websites.

MOBILE APPLICATION

We have included a dedicated Responsible Gaming section in our OPAPP mobile application, which informs players about the Responsible Gaming principles and the KETHEA-ALFA helpline number (1114).



New opapnet portals



Responsible Gaming in Cyprus

OPAP Cyprus follows similar responsible gaming principles and values as OPAP S.A. Its objective is to establish a responsible and safe entertainment environment, where customers are respected, and minors and vulnerable social groups are protected against eventual harmful consequences caused by the company's activities. In late 2018, OPAP Cyprus issued its new Responsible Gaming Policy, which was communicated to all employees and agents.

All agents had relevant responsible gaming material distributed. In every agency there is a tv set (called Carousel), which displays relevant content to our customers, communicating information on how to "play" responsibly. We evaluate and assess the agencies' performance and compliance regarding the implementation of OPAP's responsible gaming principles, by performing "mystery shopping" inspections.

We offer training and support tools to our agents, as part of our Responsible Gaming Policy, focusing on procedures for identifying age limits and signs of problematic behavior among players, as well as providing information on referral of clients, exhibiting problematic behavior, to competent support and treatment bodies. In October 2019, 100% of OPAP Cyprus sales agents were briefed and trained on Responsible Gaming, compliance and anti-money laundering.

OPAP Cyprus, in association with the Ministry of Health, has established a national phone line (1444) to support people dealing with addiction to gaming.



Responsible Advertising and Marketing

In order to ensure that our communications are responsible, we fully comply with HGC's Decision no. 163/4C/09.07.2015, "Regulating gaming commercial communication issues" (GG B' 1824) as currently in force, which defines the principles for gaming operators' communications, promotion, marketing and advertising activities and, generally, every aspect of commercial communication.

The Decision sets the general main principles of the gaming commercial communication that includes, among others, the following:

- Refraining from targeting high risks groups through advertising and marketing activities.
- Refraining from misleading the public about the odds of winning and the amounts that can be won.
- Refraining from offering irrational incentives, to attract more players promising guaranteed wins anytime.
- Describing in a clear way that profit is purely a matter of chance.
- Refraining from conveying the message that playing is a way of getting rich or a way out of financial difficulties.
- Refraining from offending ethics and traditions and encouraging racial discrimination or any discrimination regarding ethnicity, religion, gender or age.
- Refraining from associating playing with substance use and violence, sexual exploitation or illegal conduct.

According to the Code of Conduct and the Communication and Advertisement Policies on Responsible Gaming for both OPAP S.A. and Hellenic Lotteries S.A., available on our corporate intranet for all our employees, we ensure that all our advertising and other public communications are legal, decent and truthful, comply with the relevant regulatory framework and respect the rules of Responsible Gaming.

All sales promotion activities are approved by the competent regulatory body (three-member Supervisory Committee and/or the Hellenic Gaming Commission). We ensure they are decent, fair to participants, do not cause disrepute, respect participants' privacy and conform to the current regulatory framework and the corporate policies in force. Within this context, we have briefed all communication agencies and cooperate with them on policies and practices regarding what they can communicate, in line with our Responsible Gaming principles.

As a result, in 2019, there were no relevant fines or other sanctions imposed by respective authorities.

Working with all Stakeholders on Promoting Responsible Gaming

We constantly promote dialogue and seek to build consensus together with key stakeholders, to ensure that the principles of Responsible Gaming are disseminated to the general public.

In 2019, we presented our Responsible Gaming strategy to the Hellenic Gaming Commission and engaged and collaborated with various stakeholders, who included among others:

- The World Lottery Association (WLA)
- The European Lotteries (EL)
- Various academic institutions, such as the Athens University of Economics and Business
- The Therapy Center for Dependent Individuals (KETHEA)
- Adolescent Health Unit

We participated in a jointly organized two-day corporate responsibility-Responsible Gaming seminar by the World Lottery and European Lotteries Associations, during which we advanced our knowledge and skills related to Responsible Gaming and exchanged ideas and good practices with lottery members from around the world.

OPAP is a founding member of the European Lotteries (umbrella organization of National Lotteries operating games of chance for the public benefit in Europe) and the World Lottery Association, which participated and financially supported the Council of Europe's and European Union's Joint Project "Keep Crime out of Sport+" (KCOOS+). The aim of the project is to support EU countries to implement the Macolin Convention's key provisions. As the only

legally binding international treaty promoting global co-operation to tackle the manipulation of sports competitions, the adoption of the Macolin Convention is a historic milestone for fair play and integrity in sport. The Convention covers all topics relative to the fight against match-fixing including national and international cooperation, the sharing of information, national platforms, criminal provisions, whistle-blowers protection, education and prevention, conflicts of interest, and measures against illegal sports betting.

The European Lotteries Association supported the ASPIRE (Activity, Sport, Play for the Inclusion of Refugees in Europe) project, led by ENGSO, which is an international project that focuses on the social inclusion of refugees. ASPIRE seeks to establish methods on how sports clubs can better support the social inclusion of migrants and refugees, capitalizing on the wide popularity of sports and other forms of physical activity.

OPAP is a founding Member of the Global Lottery Monitoring System (GLMS) which is a key partner of the IntegriSport project. The IntegriSport project, which is co-funded by the EU ERASMUS+ program, will run from January 2020 until December 2021 and takes on a unique approach, developing and disseminating a comprehensive education program focusing on protecting grassroots (U16-18) and women's football players in Belgium, Cyprus, Czech Republic, Greece, and Malta from threats of sport manipulation (match fixing) and other related sport-regulatory or criminal activities. The project is coordinated by the CSCF Foundation for Sport Integrity, together with its 7 partners, the football federations of Belgium Cyprus, Czech Republic, Greece and Malta as well as the Global Lotteries Monitoring Systems (GLMS), and Ghent University. UEFA and the Council of Europe are supporting organizations. The project will include data collection, desk research, implementation and evaluations.

Within 2019, OPAP supported 4 Responsible Gaming activities, as follows:

- The Helpline 1114 by KETHEA-ALFA.
- The "12th State of the Art Adolescent Medicine Course" conference, organized by the Adolescent Health Unit of the Children's Hospital "Panagioti & Aglaia Kyriakou" and the Hellenic Association for Adolescent Medicine.
- The Youth Power intervention program of the Adolescent Health Unit.

TREATMENT REFERRAL PLAYER HELPLINE

We collaborate with the Therapy Center for Dependent Individuals (KETHEA ALFA) and we offer psychological support and advice not only to players but also to their family members.

Players who consider themselves addicted or at risk of becoming addicted to gaming (as well as their family members or friends), can contact the dedicated Helpline 1114 by KETHEA-ALFA, established in cooperation with OPAP in 2011, at a cost of a single local rate unit for consultation. Support information and services are also available via email at 1114a@kethea-alfa.gr. The line is supported by OPAP, operates Monday to Friday from 09:00-21:00 and is staffed by dedicated professionals. In 2019, there were 1,712 calls made to the helpline.

We receive KETHEA's monthly reports with statistical data about the helpline's operation, which are analyzed internally to record data such as callers' demographic characteristics, their playing habits, as well as their behavior in terms of playing frequency and spending amounts.

INTERVENTION PROGRAM

In collaboration with the Adolescent Health Unit, we have designed the "Youth Power" educational intervention program that addresses pre-teenage children. The program, which utilizes an experiential learning approach, was continued in 2019 in order to:

- Inform and educate children on high risk issues such as addictive substances, excessive gaming, alcohol, smoking, risks and dangers on the Internet and school bullying.
- Provide the necessary information and develop their skills (e.g. strengthen their self-esteem, critical thinking).
- Strengthen children's positive thinking and promote healthy life choices.
- Facilitate relationships among young people.
- Sensitize parents and teachers

F.PROTECTING OUR PLAYERS

F.2.2. Draw Credibility and Data Security

Ensuring Credibility and Transparency of Draw Processes

The credibility of our draw processes is the single most safeguarding measure that sustains our relationship of trust with our players.

We therefore place great importance on our draw processes to be perceived as being indisputably credible and objective by all our customers. For our operations, our top priority is to tackle credibility issues even further, instilling our game mechanism transparency and Responsible Gaming philosophy into all touchpoints and agents.

Draw Credibility in Mechanical Lottery Machines

With regards to the draw credibility in games that run through mechanical lottery machines, the following actions have been established:

- An independent 5-member Draw Committee (appointed by the Ministry of Culture and Sports), responsible for examining and ensuring the reliability of draws in LOTTO, PROTO and TZOKER.
- A specific draw regulation (Joint Ministerial Decision no. 7905/27.02.2009 GG B' 430/10.03.2009), which describes in detail all procedures that must be followed during the draws, as well as all the necessary corrective actions to apply in case of malfunction.
- An independent 15-member Audit Committee (appointed by the Ministry of Culture and Sports, Law no. 2843/2000), responsible for ensuring the reliability of draws. A file containing all participations for every draw, locks via a hash key and is transferred to an independent Computerized System. Only after data is secured and verified, the Audit Committee gives the final go to start the draw.
- Additional procedures to further ensure the uninterrupted operation of all mechanical lottery machines used for draws.
- The 24/7 monitoring of the drawing hall, where the draws are conducted, through a high-quality security system, and permission of access is granted only to authorized personnel.
- All draws are open to the public and are broadcasted live from a nationwide TV station.

24/7

monitoring of the drawing hall

2

independent Committees responsible for ensuring the reliability of draws

360

draws every year open to the public and broadcasted live

Draw Credibility in Random Number Generators

We have systematically followed a number of key practices to ensure draw credibility in games that utilize random number generators. More specifically, the following actions have been established:

- Independent integrated secure cryptographic systems generating random numbers in SUPER 3, EXTRA 5 and KINO games, which are certified on a regular basis by academic, educational or research institutions in Greece and abroad.
- A specific draw regulation (Joint Ministerial Decision no. 7905/27.02.2009 GG B' 430/10.03.2009), which describes all procedures to record numbers from every electronic draw after they are generated.
- An independent 15-member Audit Committee (appointed by the Ministry of Culture and Sports, Law no. 2843/2000), responsible for ensuring the reliability of draws. The Audit Committee verifies both participation and winners files' hash keys ensuring that there is no kind of external breach in the system.
- Electronic draw systems are located in secure areas, protected by special security and access control systems.
- A single way communication process between the Random Number Generator (RNG) system (created and maintained by Patras University's Computer Technology Institute and Publication) and our own central system which accepts betting from all customers, developed to ensure that the RNG system does not monitor the numbers chosen by players. The file with all participations closes and locks via a hash key when finalized and the system creates a different hash key to lock drawn numbers, which ensures the process's credibility and transparency.

It must be noted that in 2019, there were no legal actions on behalf of players regarding credibility of draws



Ensuring Information Security

We implement several security controls to prevent security breaches, such as unauthorized data retrieval and storage and accidental or intentional destruction of information to ensure confidentiality, integrity and availability of information, games' operation and customer service provision.

Due to the criticality of our operations, we apply a wide set of controls and practices to ensure information security, which specifically include:

- An Information Security Management System to overview the security of information confidentiality, integrity and availability.
- Information Security Committee meetings for security, held at least semiannually, to identify significant information security risk trends, review serious information security incidents and recommend mitigation actions.
- Regular risks assessments to identify and prioritize information security vulnerabilities and define appropriate risk treatment plans.
- Regular security awareness and training sessions on information security, latest cyber threats and good practices, either through induction class courses or our e-learning platform.
- Administrative and technical controls to protect information, including intellectual property, stored on electronic and computing devices.
- Implementation of security by design practices to effectively ensure protection of information at all stages, at rest, in use or in transit, based on a combination of technologies, such as firewalls, intrusion detection and prevention systems and security information and event management systems.
- Data centers' physical and environmental security protection, with appropriate temperature and humidity conditions, protection against earthquakes and lightning strikes, fire detection and suppression, as well as a CCTV system.
- Access controls for all building facilities, which enforce restrictions on higher risk areas containing sensitive or critical information.
- Controls on gaming systems, including hardware encryption devices, which ensure protection of information stored in terminal machines and central database or transferred between systems.
- An independent 15-member Committee dealing with winners proclamation and objection trials for all games of OPAP S.A.' with 15 regular and 15 alternate members (public servants) to monitor and verify the integrity and credibility of transactions for all OPAP's games processed by the Central System, declare winning tickets and evaluate any potential objections (not applicable for online betting, as there is no regulatory obligation).

All employees are obliged to promptly report any potential information security incident to the Security Incident Handling Team through email or phone. Examples of incidents include observed or suspected unauthorized action, misuse of information assets and security vulnerability or threat.

Within 2019, all security operations were performed successfully against our performance indicators regarding service downtimes, security testing, security incident service level agreements and security awareness.

Our Information Security Management System was certified in accordance with ISO 27001: 2013 Standard and WLA Security Control Standard: 2016 (WLA-SCS:2016), making OPAP the only Greek company that holds the latter certification. The certifications cover the design, development, operation, management and security requirements for lotteries, fixed odds, mutual betting, numerical lotteries, sport betting and VLT operations. They are among the most acclaimed and demanding security standards internationally and affirm that our products comply with the most demanding information security and game integrity requirements. Additionally, they showcase our commitment to continuous improvement, as well as to developing leading products and services, which ensure customer satisfaction. The certification process, which required an extensive company-wide audit, was conducted by TUV Hellas.

We have a strong IT-security, as we have:

- Established a 24/7 Cyber-Security Operations Center for prompt notifications on security alerts and corresponding incident response procedures.
- Established monthly automated scans on public-facing IT Systems, simulating a "hacker's eye" on the corporate digital footprint.
- Strengthened utilized cloud services, as an expansion to the on-premise security policy in effect.
- Incorporated latest cyber-security tools and platforms to support the organization's evolving technology landscape.

Protecting Personal Data

The issue of personal data privacy is particularly important for delivering our products and services to our users. For this reason, in 2019, we performed several actions, such as:

- Defined an annual compliance program to achieve effective monitoring of compliance with the applicable data protection legal framework and internal policies (such as the Data Protection and Privacy by Design Policies) in line with the information security management system adopted and monitored by the Information Security Office.
- Provided support on pending items, in the context of our continuous compliance monitoring, to ensure timely implementation of required actions and changes.
- Implemented appropriate technical and organizational measures to comply with the Data Protection Legal Framework.
- Revised all privacy notices in order to ensure full transparency and clearly communicate to our players and all other data subjects the purposes for which we collect and process their personal data.
- Conducted training of staff and key management personnel, including an e-learning course on Data Protection as part of the mandatory training for all employees.
- Applied all necessary measures to protect players' personal data in the context of high winnings payment and issuance of winning certificates.
- Conducted risk assessments and audits, on a regular basis, to identify and prioritize data security vulnerabilities and define appropriate risk treatment plans. In 2019, no complaints were received by outside parties or regulatory bodies concerning data breaches. A phishing incident was identified and was subsequently handled in accordance with the provisions of the EU GDPR and our internal data breach management process. We addressed the issue with the Hellenic Data Protection Authority (HDPA) and the case is now closed.
- Identified high risk areas and performed data protection impact assessments.
- Executed data processing agreements with all suppliers who act as data processors and several controller-to-controller agreements in cases where disclosure of personal data to/from business partners is required.



Enhancing our network

Achieving common goals

Our objective

Recognizing that we operate in a challenging economic environment, we dedicate our efforts to the development and upgrade of our sales network.

Our aim is to place our customers at the top of our priorities and provide the resources to improve our network partners' operations at every level.

Key achievements in 2019

- Developed 399 new stores and renovated 155 stores.
- Continued to develop our network, reaching a total of 823 certified stores according to REX 2020 standards.
- Launched Play games Jackpot.

Key targets for 2020

- Continue to develop our network, aiming at certifying 400 additional OPAP stores according to REX 2020 standards.
- Roll out new satellite equipment in OPAP stores.
- Complete optimization of VLTs rollout and Self Service Betting Terminals.

CHAPTER F.3

In this section

1. Investment and Transformation
2. Supporting our Network
3. Training our Partners

Our progress against 2019 targets

90%
ACHIEVED

10%
IN PROGRESS



F.3 ENHANCING OUR NETWORK

F.3.1. Investment and transformation

Our distribution network is one of the largest exclusive commercial networks in Greece, as we offer our games and services through 3,778 dedicated and branded OPAP stores throughout the country, while a further 9,468 points of sale and street vendors are utilized to distribute SCRATCH tickets and passive lotteries. In addition, our network includes 428 PLAY stores in Greece and 199 OPAP stores in Cyprus.

Geographical distribution of our network

Position	OPAP stores	OPAP PLAY stores	Hellenic Lotteries' Points of Sale
Attica	1,464	190	4,229
Macedonia and Thrace	919	102	1,850
Western Greece	244	20	547
Thessaly	236	26	498
Central Greece	181	17	386
Crete	183	19	525
Peloponnese	193	18	453
Aegean Islands	178	20	537
Epirus	122	11	254
Ionian Islands	58	5	189
Total	3,778	428	9,468

* Excluding OPAP stores.

Investing Consistently in our Network

We are committed to maintain a sales network that offers a state-of-the-art product and service portfolio to the wider customer base, as well as contribute to our network's smooth and successful operation, by investing in our agents' operations and systematically supporting them through various initiatives.

We propose new locations for development to our agents and indicate investment opportunities to establish a new agency, during which we:

- discuss investment opportunities with our agents,
- select the right location and the proper store to accommodate all our products,
- take into account our corporate identity rules and local restrictions, and
- create a modern agency from scratch.

We have implemented various initiatives to upgrade our network's image, improve its functionality and enhance its infrastructure, in our attempt to highlight our improved game portfolio.

In 2019 we continued our network development by building 399 new OPAP stores, delivering 155 OPAP store renovations (on top of the 505 new OPAP stores and renovations within 2018) and we certified another 639 OPAP stores according to REX 2020 standards (823 in total since the program initiation in 2018). We continued enhancing our stores' visibility with more than 130 PLAY store façade renovations across the network which were subsidized by OPAP. We improved gaming areas in order to make the Play stores even more customer friendly.

Moreover, we deployed new technological equipment and new products, specifically:

888

Digital Signage players rolled out in our network

25,000

PLAY game machines (VLTs) have been installed (6,040 VLTs were installed in 2019)

6,154

Opapbet terminals (SSBTs) have been installed (786 SSBTs were installed in 2019)

2,865

OPAP stores were certified with Tora Wallet Services

125,932

customers registered in our on-line games (Pamestoixima.gr and tzoker.gr)

PLAY Stores Initiatives

DIGITAL TRANSFORMATION OF PLAY STORES

In 2019, we used technology to transform our PLAY stores. Through the use of digital signage, interactive tools and audio solutions (live sound messages and broadcasting, multiple audio zones), we have created an audiovisual multiplex retail experience supported by vivid screens and audio media within PLAY stores.

As part of this development, we digitalized promotions (product launches and retail promos) across our network, quickly covering national and local needs. In 2019, more than 100 digital spots, 600 digital banners and 400 audio jingles were produced that were solely used within the Play stores.

We also developed and successfully launched the new "Push Notification" feature only on OPAP and PLAY store screens, which creates further value in the Digital Signage investment of our network, with no extra costs for our partners and OPAP.

OPAP PLAY GAME MACHINES

We completed the installation of PLAY game machines in the Greek market. Starting in 2017 with only 100 machines, by the end of 2019 there were **25,000 PLAY game machines** installed throughout our network in Greece, providing an exciting entertainment experience to more than 440,000 registered players.



LAUNCHING PLAY GAMES JACKPOT



On the 19th of April, the world's largest land-based Jackpot arrived exclusively at PLAY and OPAP stores.

PLAY game machines are connected to a common Jackpot mechanism, collecting every day and every minute remarkably large amounts that our customers can claim by playing the Play game of their preference anywhere in Greece.

In 2019 our PLAY games Jackpot offered a total of **€ 15,418,204.51**.

The launch was supported with a national Jackpot communication campaign, which premiered on May 6th presenting 18 different promotional materials, which embellished more than 360 PLAY stores and 1,900 OPAP stores, an advertising campaign at bus stops in approximately 10 major cities, distribution of promotional brochures throughout Greece, content for OPAP and PLAY store screens, as well as new jingles in PLAY stores and supportive educational materials for our partners.

OPAP MEGA PLAY STORES

Following the success of our first MEGA PLAY store in Volos city, we added four new MEGA PLAY stores to our network, which began operating in 2019, thus counting five MEGA PLAY stores in total.

Our new MEGA PLAY Store in Peristeri, Athens, has advanced design, technologies and customer offerings. The store is equipped with the brand new element "Tower of Top Games".

Our new Mega PLAY store in Ampelokipi, Athens opened in November, in the "ANESIS" building, one of the most historic buildings in Athens. The new store brings a theatre, a summer cinema and the unique Play experience together in one building, thus offering our customers a unique entertainment experience.

The MEGA PLAY store in Corfu began its operation in September 2019. It is the first flagship store that was developed through the renovation of a standard PLAY store.

The MEGA PLAY Store in Thessaloniki began its operation in November 2019. In the first month of operation the store welcomed more than 1,800 visitors. The store has 100% paperless communication via Digital Signage screens and directional audio equipment, spacious gaming and privé areas, and event hosting areas.



Ensure OPAP Network Compliance with Commercial Standards

At the end of 2018, we started the audit of minimum standards with a common goal to complement the applicable regulatory and contractual compliance of the network, building up a strong Compliance Framework in 2019. In the second half of 2019, we added certified REX 2020 stores in our audit to enhance the focus on customers within our stores and optimize the overall experience offered. The focus list consisted of 9 items for standards in OPAP stores and 24 items for REX stores in order to maximize their commercial success.

Overall, in 2019, 93% (normalized percentage across all KPIs used) of OPAP stores network were compliant with commercial standards.

Retail Excellence Program 2020 (REX 2020)

In 2018, with a common goal of transforming our stores into unique entertainment destinations, we introduced for the first time the Retail Excellence 2020 (REX 2020) program. In 2019, we continued the same program which aims to continuously enhance the competitiveness and profitability of the network by providing the optimal customer experience in our stores.

REX 2020 is an integrated support program created to assist our partners, to maximize their commercial success in 5 pillars:

- Network development pillar: establish an optimal store type and size in the ideal spot, to maximize the potential of the market
- Look and feel: set an ideal in-store atmosphere
- Agent and staff: provide specialized training to the stores' employees, ensuring the proper customer experience in the store
- Digital assets: install a digital-content projector that creates an immersive digital experience
- Products and services: optimize the support and promotion of all our products and services

This program applies to all new, renovated and existing stores. To actively support the diffusion of this visionary program, our company funds our network by offering loans of up to € 10,000,000 (for constructions and big renovations) and € 2,000,000 (for the installation of digital signage equipment) for all of our stores.

5 pillars

NETWORK DEVELOPMENT	>
LOOK AND FEEL	>
AGENT AND STAFF	>
DIGITAL ASSETS	>
PRODUCTS AND SERVICES	>

The program's objective is to increase the competitiveness of our stores and upgrade our customers' experience. Retail teams and OPAP's partners can decide what is the best solution to adopt, based on the directions of the "REX 2020 design guidebook" which was updated during 2019 in accordance with our network's standards. This lays out the requirements and minimum commercial standards that agencies have to fulfil in order to get certified as a "REX 2020" agency.

By the end of 2019, 639 new stores had been certified, reaching a total of 823 certified stores, and 626 new loans and subsidies had been approved. At the same time, we aim to reach 1,080 certified stores by the end of the 2020 and continue to apply the program's best practices.

F.3 ENHANCING OUR NETWORK

F.3.2. Supporting our Network

Operational Excellence Team

As part of our commitment to continuously invest and develop our network, we collect feedback from every available agent / touchpoint daily, and provide suggestions for actions and initiatives to enhance our offering and achieve our common goals.

To optimize our network operation, in April 2019, the new cross-functional Operational Excellence team was formed with a mission to:

- Collect the real picture of OPAP stores' daily operations by exploiting a variety of means and tools (such as Working Groups, Satisfaction Surveys, etc.).
- Identify the areas in which we need to improve and bring all the involved teams together in order to find and implement the best-fit solution for every issue.
- Measure and evaluate the effectiveness of our actions by systematically monitoring key performance indicators and collecting feedback from our partners on the effectiveness of the provided solutions.

By the end of the year, more than 20 major projects that improve the daily operation of our stores had been implemented thanks to the collaboration of multiple OPAP departments and the coordination of the Retail Operational Excellence team.

Merchandisers

OPAP merchandisers pay 20-30 minutes visits to all our network on a quarterly basis. Merchandisers bring basic material to the stores, organize window branding, monitor compliance with minimum commercial standards (standard and REX stores) and share market insights from the field such us:

- Product / service support (selling stories): We provide assistance and mini training to agents each month based on OPAP's priorities, to be able to offer games / services efficiently.
- Look and feel audits: We map the stores.



Effective communication

In 2019, we utilized and materialized a number of channels and initiatives to maintain an ongoing and effective communication with our partners throughout our network:

- **51,422 one-to-one meetings** between Account Managers and partners in OPAP stores, 10,520 in Play stores and 23,797 in Hellenic Lotteries points of sale.
- **Personal Advisors for OPAP stores** and dedicated team for PLAY stores network to provide personalized and effective partner support and service, as well as to ensure their efficient operations.
- **3 B2B portals opapnet**, opapnet|play and opapnet|laheia and 1 common (3 to 1) mobile application providing daily news and updates access solely to every partner.
- **19 combined working groups** between OPAP employees and partners with 228 participations in total (with around 12 persons per group). More specifically:
 - 3 Hellenic Lotteries working groups
 - 1 Horse Races working groups
 - 6 PAME STOIXIMA working groups
 - 2 Play games working groups
 - 4 Numeric games working groups
 - 3 Tora Wallet working groups
- **2 large-scale events** in 2 cities between OPAP executives and PLAY store partners to communicate common objectives and discuss our network investments.





We leveled up our communications and marketing through several campaigns and events, including:

- A new way to communicate each month's events at a store level was introduced through the new "Event Calendar" Digital Signage and Audio feature, covering thematic events (lucky draws, party night, pizza night, match of the day, ladies' night, burger night, souvlaki night), which were hosted to further enhance customer experience in stores.
- Events and promotional campaigns within stores were organized, following granting the necessary Regulators' approvals, both at national and local levels to enhance fun and celebration in our stores and further enhance customer experience. Indicatively, 3 retail national campaigns and 5 PLAY game promotions, which were carried out throughout Greece, to increase awareness of PLAY stores.

Opapnet Portals and mobile app

In 2019, as part of our continuous efforts to establish a direct communication relationship with our network partners, we kept evolving our 3 B2B portals; opapnet (for OPAP Store partners), opapnet|play (for PLAY store partners) and opapnet|laheia (for our indirect channel of Hellenic Lotteries Points of Sales), which OPAP Store and PLAY Store partners can access through opapnet and opapnet|play respectively and our indirect channel of Hellenic Lotteries Points of Sale can access through opapnet|laheia.

We upgraded our portals into a new increased efficiency platform and redesigned our user interface and experience (UI-UX) design so as to accommodate our partners' need for enhanced communication and support.

The portals redesign included:

- **Upgraded homepage** which includes all the tools and information most frequently searched and used by our partners in a modern environment.
- **New Dynamic Calendar** to enable our partners to organize their time effectively.
- **Updated announcements section** that includes summaries, estimated reading time, and action indication in case an action is required by the user.
- **A new cutting-edge platform** that allows us to further evolve our portal with many new functionalities in the future.

We made several improvements and added new functionalities into our opapnet portals to increase the level of support to our network's day-to-day activities, which included monthly releases, based on our Go-To-Market plan and network needs.

We also delivered our new mobile 3 to 1 application for partners in all 3 networks that brings the most important desktop tools into a portable – mobile environment. Our new application for Android and iOS devices introduces even more features that make the communication with our partners easier than ever:

- **A common application** that provides access to every network. Our partners in all 3 networks are able to browse the content and tools of the network to which they belong through the same application
- **Settlements section** giving access to our partners' settlements and the Combined Payment Facility documents to allow for easy payments

- **Ticketing tool** offering our partners the ability to manage any issue they encounter in their store easily, through their device
- **Tool to transfer and reserve credit limits between gaming platforms**, giving our partners the ability to manage them with increased flexibility and security.

The importance of these portals and mobile application to provide timely and accurate information regarding our partners' operations is indicated by the number of communication activities and the high-level of engagement with our partners through these portals.

OPAP PLAY Loyalty Program

Following the Hellenic Gaming Commission's approval of the PLAY games Loyalty Framework in July 2018, 2019 signified a year of operation for the program and a new series of initiatives to boost customers' experience.

Go-to-Market of New Products

In order to help our partners, increase their customer base and competitiveness, we provide support during the roll-out of new products and services. In 2019, we assisted our partners in taking advantage of the dynamic of our existing and new game launches and retail initiatives through our Go-to-Market agenda which included:

- **Launch of 20 SCRATCH Games** and the new SCRATCH pouch.
- **Launch of Cash Draws for PLAY Games** in OPAP stores.
- **Launch of tzoker.gr**, in accordance with campaigns including loyalty offers approved by the Regulator.
- **Launch of Tora Bill Payments and Tora Remittances** in OPAP Stores, a campaign dedicated on tax payments and the campaign for Road Tax Payment Services with a road assistance offer.
- **Launch of KINO** in Opapbet (SSBTs) terminals.
- **Launch of PAME STOIXIMA promos**, launch of new sports in PAME STOIXIMA (cricket, ping-pong, rugby, Australian football, boxing, MMA and more), pilot of the new sports Live Channel in 120 stores, launch of new PAME STOIXIMA features in OPAPP mobile application.
- **Launch of the new OPAP Loyalty rewards scheme.**
- **Launch of Play Games Jackpot** and 30 new Play Games, as well as the Cash Draws in Play and OPAP stores.
- **Launch of the new National Lottery.**





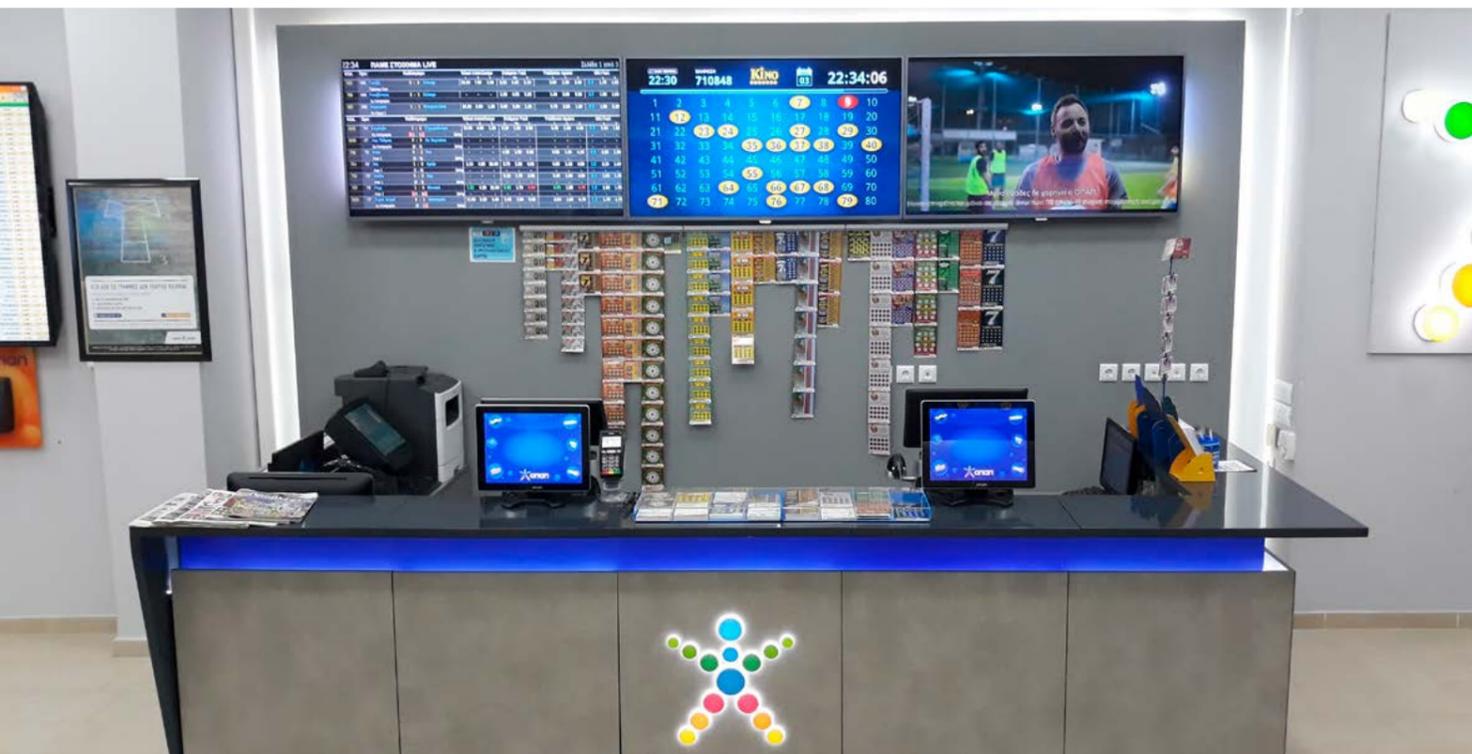
Opapdeals and Subsidy Model

Having demonstrated great success in OPAP stores in 2018, Opapdeals, our agents' benefits program was expanded in PLAY stores in 2019. The new Network Agreement Program offers a comprehensive portfolio of central agreements with leading suppliers in 3 main categories (services, food and beverage, and equipment) aiming to deliver value adding products and services to every PLAY store. Detailed information on more than 20 central agreements can be found in the new dedicated section of our opapnet|play portal created as a "one-stop-shop" page to help our partners navigate through the provided offers, get informed on their benefits and discover how they can register.

In addition to the Opapdeals program, each Play store in our network is eligible to benefit from a monthly Subsidy Model, renewed for 2019 after completing a successful "cycle" in 2018. The Subsidy Model plays a key role in increasing the satisfaction of our customers, through the upgrade of the "entertainment menu" of each store. The model can be used to purchase snack products, coffee and soft drinks in subsidized categories based on the real needs of each store. By the end of 2019, 95% of our network participated in the Subsidy Model.

OPAP Network & anti-smoking law

The new anti-smoking Law 3730/2008, amended and in full force, prohibits smoking and consumption of tobacco products in all public or private, indoors or covered spaces, serving as working environments and in all food and beverage establishments. As part of this development we implemented several initiatives to help our stores fully comply, such as the creation of dedicated non-smoking informational material and outdoor store design-guidelines and the provision of new Opapdeals on necessary outdoor equipment.



Performance Management

OPAP continued to support its partners' performance through performance management and bonus scheme. At OPAP stores, we continued our network performance scheme "Opapleague", for the third consecutive year to motivate our partners to continuously evolve and exceed our expectations. This year, through Opapleague we rewarded our partners with significant prizes, which were offered in the form of extra commissions. In addition, the REX2020 Program was introduced in Opapleague for the first time with a brand-new reward scheme to partners, which offered extra commission for the first calendar quarter after their certification.

Targets were set according to commercial and objective criteria, focusing on the agents' strengths and areas of improvement. Targeting and monitoring are interconnected. Thus, opapnet aimed to provide every partner and our Account Managers with effective monitoring through five new reports, which offered insight on all key performance indicators.

In 2019, PLAY Aces, the new Reward and Recognition Program, was launched for PLAY stores with a mission to distinguish the "Aces" of our network by setting commercial priorities into a clear action plan, setting performance criteria, supporting development, helping performance maximization, and rewarding top monthly results of stores across our network. The program includes monthly tournaments, in which the network participates in 2 teams (based on the monthly amount played) and can win monetary rewards. Every member of the store is involved in Play Aces and contributes to the overall performance of the store. Continuous guidance was provided to each store to help them achieve the best outcome.



F.3 ENHANCING OUR NETWORK

F.3.3. Training our Partners

We provide various training programs to our agents through our sales training team, either at our premises or in broader areas of their agencies, depending on our training plan, in order to ensure their smooth operation. All existing and new trainings (online, on-the-job and classroom) include definitions such as:

- Customer service and customer segmentation
- How to communicate effectively with clients
- How to translate product elements into client benefits

It must be noted that, if deemed necessary, employees from agencies and Hellenic Lotteries points of sale can participate in training programs regarding:

- Games' rules
- Responsible Gaming
- Standard operational procedures and policies

Within this context, we materialized several initiatives to train our agents. More specifically we:

- Created modern interactive training material, for online training to further enhance the wide range of training programs for our sales network.
- Provided on-the-job training within the first days of each OPAP Play store's establishment.

We offered 5,978 classroom training hours for OPAP and Play store agents and staff, Hellenic Lotteries' distributors, street vendors, retail stores, and OPAP stores' and indirect channels' account managers.

5,978

classroom training hours offered for OPAP and Play store agents and staff

25,000

training hours completed by Play and OPAP store partners

8,000

hours on-the-job training offered

4,895

OPAP store partners successfully completed 'Numerics in Apollo' training

90

new e-learning materials created

Network Training Highlights

In 2019, we optimized our training by offering classroom, on-the-job and e-learning classes to our network through OPAP Retail Academy, which was also launched for the first year for Play stores in March 2019. Highlights from the program include:

- **Classroom training:** A total of 4,337 hours of training for OPAP stores and 1,641 hours of training for Play stores were completed. The training was provided to over 413 OPAP store groups (HL and frontliners included) and 1,900 Play store personnel.
- **On-the-job training:** A total of 8,000 hours of training for 522 OPAP stores and 15,720 hours of training for Play stores were completed. This includes the training for the 142 new OPAP stores and 44 new Play stores.
- **e-Learning training:** We relaunched the OPAP Retail Academy platform with new user interface and user-friendly functionalities such as virtual classroom, search button, booking functionality and forum. We enriched our online training to offer new, updated and modern material, including 90 new e-learning materials and 40 documents.

A total of 25,000 training hours were completed by Play and OPAP store partners. The most popular lesson for 2019 was "Numerics in Apollo". 4,895 OPAP store partners successfully completed the course and another 534 completed at least one of the activities.



Νέα Εμφάνιση - Νέες Λειτουργικότητες!

OPAP Stores Training Success Stories

In 2019, we established the presence of our team in new store opening by new partners throughout the network. The aim of this initiative was to ensure smooth operation of the stores from the first day of operation, as well as support the partners in their first transaction with customers and use of terminals. This action was followed by excellent performance of the new OPAP stores and increases in revenue (GGR) brought by new partners to the company compared to the average of the rest of the network.

Furthermore, the Advanced Customer Service Skills course highlights the success of the training provided throughout our network. A total of 16 groups, 188 partners including agents, store managers and employees throughout 9 cities within our network participated in the Advanced Customer Service Skills training, which received a 99% satisfaction grade by trainees.



PLAY Stores Training Success Stories

At the beginning of 2018, we undertook a series of training seminars that would focus on developing the skills of the people in our network and enhancing their knowledge of OPAP Play. We continued this initiative in 2019 conducting a significant number of "Games Specialist" and "Open Days" interactive training seminars, enabling our people in the stores to experience an exciting day of living the product through the eyes of the customer, while also gaining clearer insight into how to focus and improve their in-store experience through the game.

The "Play Store Manager Expert" training seminar was also completed in 2019. The seminar was addressed exclusively to the managers of Play stores and aimed to strengthen their knowledge and skills on the management of their teams as well as their day to day obligations.

A total of 19 groups and more than 350 store Managers and associates participated throughout 8 cities in Greece. The trainings focused on:

- The ideal profile of the Play store Manager
- The service techniques that enhance customer experience
- The development of team selection, staffing and management skills

The feedback from the participants was excellent.

A great place to work

Developing our People

Our objective

Our People are at the heart of everything we do, bringing value and contributing to the achievement of our long-term strategic objectives, which lead us towards the delivery of our 2020 Vision. We are committed to creating a unique experience for all OPAP People; one that reflects our high performing culture and values. We focus on being a great place to work by placing our People at the center of our strategy.

Key achievements in 2019

- Optimized human resources' services, following best practices and technological advancements.
- Continued developing individual development plans via Opapacademy actions, classroom training sessions, online development centers and teambuilding.
- Strengthened the effectiveness of internal communications channels and launched more wellness activations.

Key targets for 2020

- Further enhance the blended learning culture, promoting eLearning while continuing with classroom solutions.
- Boost internship, trainee and internal career opportunities.
- Full launch of Talent Management Schemes.

Our progress against 2019 targets

100%

ACHIEVED



CHAPTER F.4

In this section

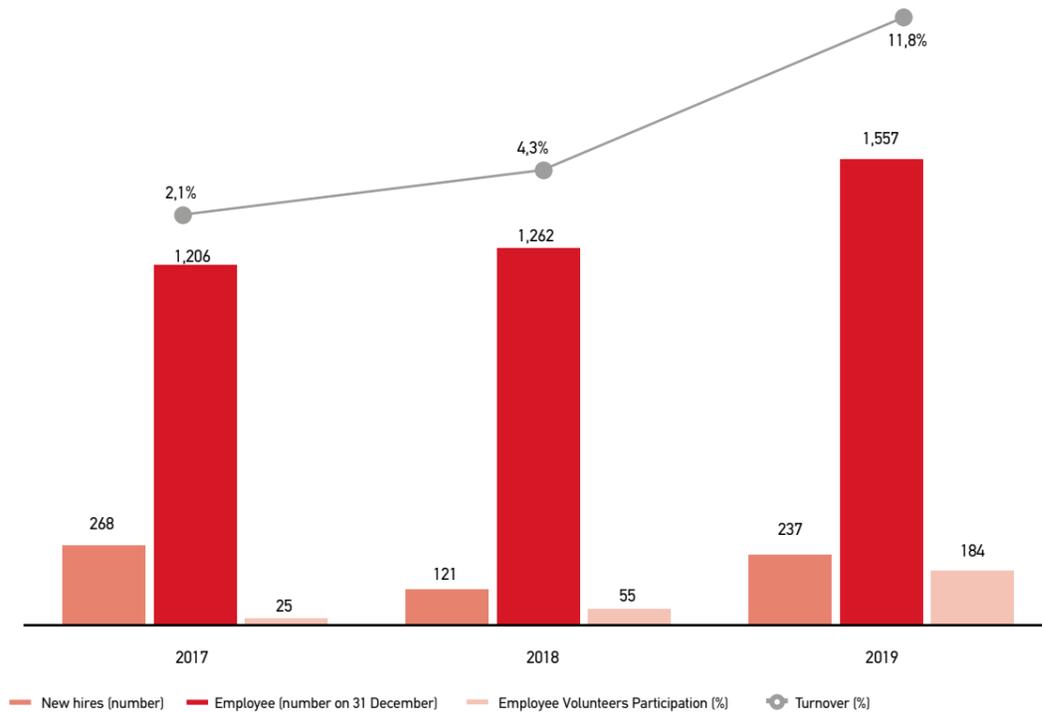
1. Attract and Engage
2. Equality and Fairness
3. Health and Safety
4. Training and Development

F.4 DEVELOPING OUR PEOPLE

F.4.1. Attract and Engage

Achieving our strategic objectives and sustaining our growth, requires the establishment of an engaging work environment. OPAP, as one of the largest and most successful companies in Greece and Cyprus, employs 1,557 employees; a number that can be deemed rather large, considering the economic challenges that the societies we operate in face. In addition to direct employment, we further leverage the creation of additional work positions all over Greece, with approximately 39,900 positions indirectly generated by our operations in Greece.

Employment Trend



*Data for 2017 and 2018 refer to the companies OPAP S.A., HELLENIC LOTTERIES S.A., OPAP SERVICES S.A., TORA DIRECT S.A., HORSE RACES S.A. and TORA WALLET S.A.
*Data for 2019 refers to OPAP Group.

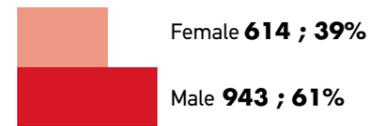
We are committed towards creating a positive, supportive, and dynamic work environment and therefore proud to have had:

- No variations in employment numbers due to seasonality.
- An average employee age of 40 years.
- 52 foreign and 12 employees with disabilities working in OPAP Group.
- An average turnover rate of 11.8%.
- 20 employees who left before completing 12 months of employment.
- Average employment tenure of 6 years.

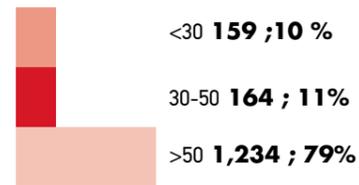


2019 Employee Breakdown

Gender Distribution
(employee number ; percentage)



Age Distribution
(employee number ; percentage)



Employment Type
(employee number ; percentage)



Employment Type
(employee number ; percentage)



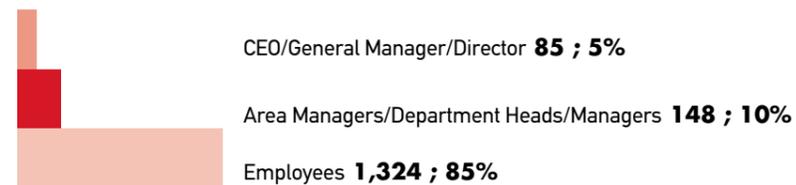
Educational Level
(employee number ; percentage)



Employee Tenure
(employee number ; percentage)



Employment type
(employee number ; percentage)

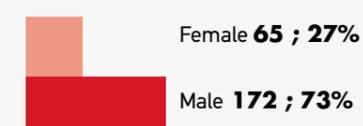


Geographic Distribution
(employee number ; percentage)

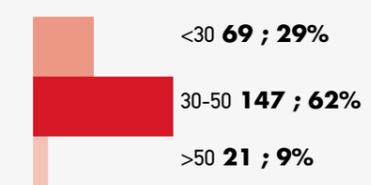


2019 New Hires Breakdown

Gender Distribution
(employee number ; percentage)

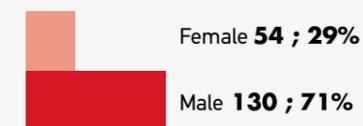


Age Distribution
(employee number ; percentage)

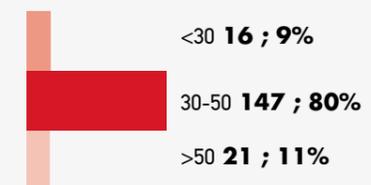


2019 Employee Departures Breakdown

Gender Distribution
(employee number ; percentage)



Age Distribution
(employee number ; percentage)



87%

of eligible employees participated in the 2019 employee survey (equal to 2018).

69%

employee engagement was achieved, reflecting our strong relationship with our employees and our objective to create and enhance a positive work environment. The areas with the highest scores include social responsibility, environment, quality and customer focus, trust in top management, confidence in the clear and promising Company's direction.



Attracting and Identifying the Right Potential Candidates

An integral step to secure OPAP's future growth is to work towards attracting, inspiring and retaining high potential, talented professionals. OPAP as an employer of choice in the Greek market, offers career opportunities and a unique working experience to exceptional professionals and talented young people, within an award-winning working environment.

OPAP commits, through a Recruitment Policy published in our corporate intranet (OPAPopen), to hire its people according to their personal value and to apply the criteria directly related to each role (specific qualifications and abilities). For vacancies which internal candidates are not able to qualify, a search begins in the external market in order to map, attract and utilize the suitable candidates in a valid and credible way.

All candidates are given equal chances of being selected, regardless of their ethnic origin, religion, nationality, sex, age, sexual orientation, family status or disability. This Policy aims to deter any discrimination, unfavorable treatment or harassment of any kind towards candidates.

In 2019, we met with over 850 candidates in person and conducted structured interviews based mainly on digital tools throughout our intensive recruitment and selection process and responded to all 12.500 applicants who sent us their application. In 2019, we hired and welcomed 237 newcomers to various teams across the Group such as Technology, Online, Commercial, Finance and Product teams.

We also communicate with our potential candidates on a regular basis through our corporate site and social media accounts (10.860 clicks on LinkedIn), share information regarding new vacancies in OPAP (in 2019 we announced 86 unique roles) and implement other employability initiatives such as career fairs and visits at OPAP's premises. In 2019, the sourcing and selection process was performed online through the new "PeopleOnline" platform offering an advanced digital (web and mobile) experience to our candidates.

237

newcomers to teams across the Group

12.500

applicants for various positions

Investing in Youth @OPAP

Offering great opportunities to Gen Y and Z is one of our main strategic priorities. In 2019, we met with over 1,600 young professionals during several career initiatives and events, informing them about our performance-oriented mindset and taking the time to understand their professional aspirations. Indicatively, we are present in the following:

	THE AUEB CAREER FAIR	
THE ALBA CAREER FORUM	THE DEREK CAREER DAYS	THE KARIERA CAREER DAYS
THE UNIPI CAREER DAYS	THE KARIERA DEVELOPERS DAY	THE REGENERATION PROGRAM
THE JOB FAIR ATHENS	THE CAREER FAIR 4 ALL	THE DIGITAL MARKETING CAMP

In 2019, following an extensive assessment process consisting of CV screening, online aptitude tests, competency based interviews and further assessment exercises (case studies, presentations) we offered jobs to 69 young professionals targeting those with a STEM background.

Moreover, we offer young professionals the chance to kick-start their careers at a leading and reliable group, through the OPAP Internship Program "Get in the Game!" and from 2019 our new Equine Veterinary Graduate Program "Ride High!" at Markopoulo Park, two programs that provide significant learning and development opportunities.



OPAP Internship Program "Get in the Game!"

Through our OPAP Internship Program, launched in 2017, we collaborate with many educational institutions, offering 1 to 6-month internship programs to undergraduate students. The internships give students the opportunity to learn and gain professional experience in various teams and specialties (e.g. technology, data analysis, marketing, human resources, commercial, retail marketing, finance and legal).

In 2018, we offered internship opportunities to 61 students. These internships helped the students to develop valuable skills and advance their personal and professional skillset. Approximately, 15 interns were hired following the completion of their internship.

In 2019, we set the bar higher than before and we enhanced our collaboration with 23 prestigious educational institutions across Greece, interviewing approximately 199 applicants and finally selecting 58 young students for the opportunity to complete an internship with the organization. 21 interns were offered positions following the completion of their internship. Our vision is to continue offering one of a kind experiences.

At the beginning of the internship, our aim is the smooth integration of the student in OPAP, to ensure a productive experience and the development of the student into a modern professional. We implement a "Buddy" system for interns and set them up with a point of contact and reference within the company throughout the internship. Additionally, induction training offered to new interns aims to familiarize students with the OPAP's structure and procedures, while during the internship, the students are offered basic training courses through the OPAPAcademy e-learning platform.

Program evaluation is carried out through communication and feedback given by both students and managers regularly during follow-up meetings and through the provision of evaluation forms upon the completion of the program. The OPAP Internship Program "Get in the Game!" received very positive feedback from both managers and interns. 95% of managers state they would recommend the intern for a future collaboration and 98% of the interns would suggest the program to a fellow student.

It should be noted that, in the last few years, 20% of OPAP interns who presented exceptional performance were hired through definite or indefinite time contracts.

EQUINE VETERINARY GRADUATE PROGRAM "RIDE HIGH!"

In 2019 we designed and developed the first Equine Veterinary Graduate Program "Ride High!", the only program in Greece targeting graduates of Veterinary Schools. It is an intense 12-month full-time professional clinical program, aiming to help young veterinarians develop both their professional skills and their capacity of identifying and solving horses' medical issues (within the disciplines of equine internal medicine, surgery, anesthesia, orthopaedical and emergency services).

The 2 graduates who are selected after the assessment process, are trained initially through OPAP's Induction Program and then receive on-the-job training by all Horse Racing S.A. teams. However, the main training is provided at the Veterinary Clinic operating at Markopoulo Park, which is the only Equine Veterinary Clinic in Greece and one of the largest in the Balkans area.

The ultimate aim of the program is to prepare the graduates to perform in a high standard level of equine medicine by receiving useful advice from experienced professionals and actively participating in demanding and practical horse care and treatment incidents.

Internship and trainee programs 2019 highlights

- Launch of Equine Veterinary Graduate Program "Ride High!"
- 23 Universities and 115 Departments we cooperate with.
- 21 interns hired (9% of new hires).
- 58 interns onboarded across OPAP Group.
- 95% of managers would recommend interns for a future collaboration.
- 98% of the interns would recommend the program to a fellow student.



Embracing the new “PeopleOnline” platform

In 2019, we continued the integrated, electronic human resources platform “PeopleOnline”, launched in 2018, to automate, further enhance and digitalize the human resources management processes, improving the experience of all employees. The platform includes a range of modules, such as:

- Performance Management and Development module.
- Employee Central module (leaves application, organizational structure, employee profile).
- Recruiting module.
- Careers module.

“PeopleOnline”, is available through all corporate devices (fixed and portable equipment) and mobile phones, making the platform modules more accessible.

Offering Additional Benefits to our People

We offer our employees a range of benefits. Aiming to continuously improve our benefits, we cooperate with a leading insurance company to offer additional services to our employees.

In 2019, the total amount of investment in the private Medical and Life Insurance Plan exceeded € 955,000. This Medical and Life Insurance Plan covers 95% of all our active employees (employees with permanent employment contracts and temporary employment contracts for over one year of OPAP S.A., OPAP Services S.A., Hellenic Lotteries S.A., Horse Races S.A., Tora Direct S.A. and Tora Wallet S.A.), with an annual checkup offered through the health insurance scheme, including digital mammography.

Furthermore, we offer:

- Benefits relevant to business need (i.e. mobile phones, laptops, corporate cars, gas cards).
- Numerous internal and external parking spots for our employees in headquarters, as well as parking spots for all employees in Thessaloniki.
- Participation in the OPAP Employee Assistance Program.

Fostering Work-life Balance for our People

We shed great importance to our employees' dedication towards OPAP. We recognize that balancing professional and personal life, results in higher levels of employee engagement and performance. Therefore, we systematically work to ensure that all employees are able to achieve work-life balance and thus:

- Define clear daily working hours and time schedules for all employees.
- Comply with relevant legislation defining intervals between end of a shift and commencement of the next shift for applicable employees.
- Comply with the legislation on the annual overtime per employee being 120 hours.
- Do not tolerate employees working overtime, under the threat of any sanction (e.g. salary reduction or dismissal).
- Compensate and reward employees for their overwork (i.e. the first hour after the completion of the legal time schedule) and overtime (i.e. the first and second hour after overwork).
- Ensure that employees receive and utilize their entitled leaves (such as paid leaves).
- Grant special leaves to eligible employees when required (e.g. parental leave to new parents, breast feeding and childcare leave to employees, leave for single parent families and student leave).

Work-life balance 2019 highlights

- No employees exceeded the annual maximum overtime limit and all over-times were fully paid.
- 58 female employees requested and were granted parental leave.
- 27 female employees who had received their parental leave returned to the company.
- No employee left the company within 12 months of returning from parental leave.
- 24 employees (16 female and 8 male) were granted student leaves as part of their undergraduate or postgraduate studies.
- OPAP was awarded for the second consecutive year, as one of the ten big companies with over 250 employees with the best work environment in Greece, as part of the Best Workplaces 2019 awards.
- In the HR Awards 2019, OPAP received distinctions for its employee engagement and well-being. Specifically, OPAP received a Gold Award in the “Best CSR Initiative” category for the “Employee Environmental Action Day” initiative and a Bronze Award in the “Workplace Well-being” category for the “Promoting Health, Safety & Well-being @ OPAP” initiative.



Promoting Effective Internal Communications and People Engagement

The main driver of our commitment towards our employees is to engage and motivate employees to utilize their professional passion and sense of belonging within a fast-paced industry, while prioritizing their well-being. By helping every employee to achieve their full capability, we recognize the importance of two-way communication to foster an open dialogue culture and utilize numerous touchpoints to maintain an on-going and effective communication.

We enhance our employees' engagement, integrating our core values and further improving cooperation through various initiatives. Notable initiatives include the entertaining "Happy Fridays" and the "Food for thought sessions" that were launched in 2019 with the aim to enhance collaboration in the organization through presentations that are brief, informal and open to all employees of the company and initiatives that are linked to our strategic priorities.

Additionally, the "Day at the office with our children" is an opportunity to share our daily work experience with our children and spend a fun day at the office and the "Lunch with Chiefs" and "Breakfast with the CEO" encourage employees to interact with Top Management representatives, strengthening communication and sharing information and ideas.

We proudly continue the recognition initiatives "Star Team" and "Star of the Month" that we launched in 2018. Every month all employees and all Teams have the opportunity to be nominated by the Senior Management Team in the respective categories and be awarded for their personal and team achievements by the CEO. In 2019, we further enriched the recognition initiative "OPAP Annual People Awards" that was launched in 2018. At the 2019 Christmas corporate event, we presented the "Star Team of the Year", "Star Employee of the Year" and "Best New Player" recognition awards for the employees' achievements throughout the year.

We also host a number of internal social events and celebrations such as a Christmas corporate event, a summer party, employees' children parties and events at the horse races, as well as events to celebrate our achievements. At the same time, we ensure that through internal efforts, we inform our people about product launches and other key initiatives. During the engaging upcycling activity "Let Them Live Again" our people learned how "OPAP Live the game - 60 YEARS" promotional banners, used in a Marathon, were converted into bags and kits, inspiring them to make original objects through upcycling.

Through corporate videos we aim to update and inform employees on the 2020 Vision, the progress of our strategic priorities, the Game Plan of each year and other important information from the Senior Management. We post content on the corporate intranet (Opapopen) on a regular basis to inform our employees about corporate news, significant initiatives and achievements, benefits and policies, as well as internal events, reaching 66,511 monthly page views.

In 2019, we sent over 360 informative e-mail announcements and 11 monthly OPAPulse newsletters with engaging content from all teams of the organization. Through our internal social platform "Yammer", accumulating 1,085 members, over 850 engaging content posts were published to promote and enhance collaboration, foster employee well-being, share company updates and celebrate achievements.

In addition, we remain active on our social media accounts (i.e. LinkedIn, Facebook and Instagram), sharing our internal engagement initiatives, wellness activities and employees' success stories. Lastly in 2019, over 28 internal communication announcements circulated, regarding corporate responsibility issues.

Our employees also engage in volunteering activities, such as participation in blood donations and fundraising running events. For more information:

 [See section F.5.1 Responsible donations and sponsoring.](#)



F.4 DEVELOPING OUR PEOPLE

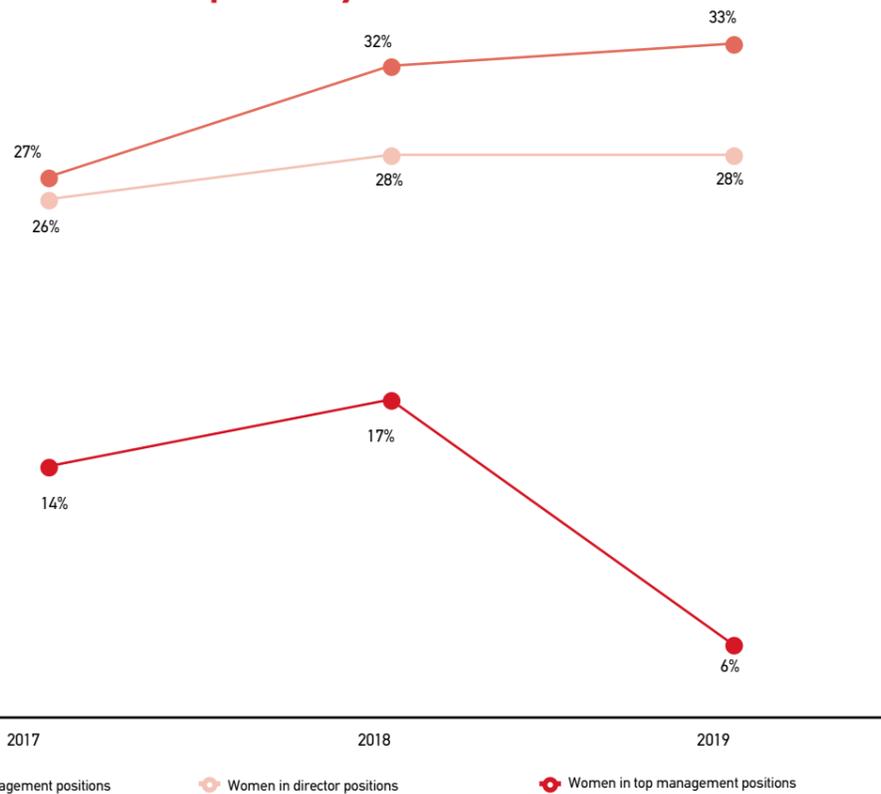
F.4.2. Equality and Fairness

Integrating the notions of diversity, inclusivity and fairness within our core values, we establish a positive work environment which facilitates a performance driven culture. Consequently, we have developed a policy that condemns all forms of discrimination, such as discrimination against race, gender, marital status, political beliefs, religion, origin, sexual orientation, age and disabilities, regarding work issues, such as recruitment and selection, salaries, promotions and career development. We do not tolerate discrimination and treat all employees equally.

OPAP's positive work environment fosters the development and professional advancement of our employees, depending on their actual performance, their abilities to deliver and OPAP's success, rather than through prejudgment and prejudiced criteria.

OPAP, as a fair and equal organization, strives to bridge the gap between men and women in top management levels. We aim to foster a working environment with an open-minded company culture that sets diversity as a top priority. We encourage female employees to reach out for higher management positions and provide support throughout their professional development. We are proud to announce that, in 2019, 28% of directors were women.

Women in Position of Responsibility



*Data for 2017 and 2018 refer to the companies OPAP S.A., HELLENIC LOTTERIES S.A., OPAP SERVICES S.A., TORA DIRECT S.A., HORSE RACES S.A. and TORA WALLET S.A.
 *Data for 2019 refers to OPAP Group.

Not Tolerating Child, Forced and Abusive Labor under any Circumstances

We fully and strictly follow the internationally recognized human rights principles, as described within the UN Universal Declaration of Human Rights.

Through our policies, which have been internally communicated and implemented, we commit ourselves to not encourage and tolerate any coercive or abusive labor in any of our premises. Also, we are committed to employ individuals, who are above the legal work age limit (as defined by the Greek legislation).

As a result of our commitments, in 2019 no operations were identified as having significant risk for incidents of child labor or forced and abusive labor.

Respecting the Right of our Employees to Participate in Employee Unions

Adhering to internationally recognized principles of human rights, we respect the right of employees to participate in employee unions and discuss topics of reciprocal interest through representatives, as well as express openly and freely their opinion, either individually or in groups. Indicatively, in Greece excluding Neurosoft operation, in 2019:

- 26% of our employees participated in Employee Unions.
- All our employees in Greece were covered by the Greek National Collective Bargaining Agreement.
- No operations were identified in which the right to exercise freedom of association and collective bargaining may be at significant risk.
- Less than 2% of our employees participated in two National General Strikes within 2019, organized by the General Confederation of Greek Workers (GSEE), due to governmental policies regarding the National Insurance System and employment-related legislation.
- The total amount of time lost due to strikes was 25 man-days, accounting for less than 0.01% of the total working time.

For major operational changes, we follow, as a minimum, the relevant regulatory requirements for notifying our employees.

Equality and fairness 2019 highlights

- No complaints or grievances regarding labor practices or discrimination incidents or unfair treatment or human rights violation.
- No legal actions regarding human rights issues and no fines or sanctions regarding human rights issues or labor practices were imposed by the respective authorities.
- Establishing a minimum salary, which in all cases was higher than the legal basic salary (or the higher collective agreement salary), as defined by local legislation.
- An almost equal ratio of salary for men and women within similar hierarchical level/area of activity/job family, with statistically insignificant variations, materializing the fact that salaries do not depend on the employees' gender.
- A high percentage of Greeks in management and top management positions*, being 97% and 22% (compared to 97% and 33% in 2018) respectively, while the percentage of Greeks in the BoD was 31%, compared to 33%, in 2018.

*Data refer to OPAP operations in Greece, excluding Neurosoft.

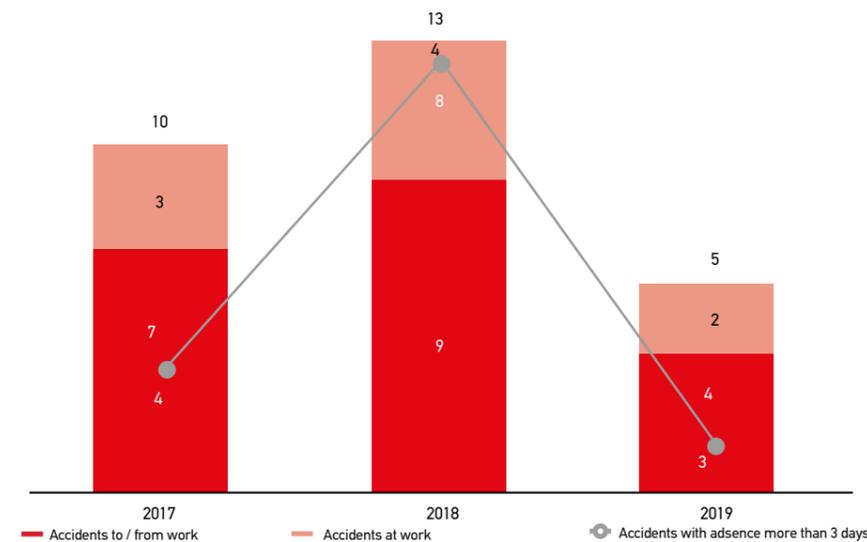
F.4 DEVELOPING OUR PEOPLE

F.4.3. Health and Safety

We believe that ensuring the health and safety of our employees is of the outmost importance, as it is a non-negotiable prerequisite for our employees' well-being and OPAP's successful operation. We focus on following health and safety regulations which ensure suitable and safe work conditions, through a number of systemically implemented practices. Indicatively we:

- Have developed an [Occupation Health and Safety Policy](#) to illustrate our commitment to shape a preventive culture for health and safety at work, which has been communicated to all employees and outlines our activities to continuously improve our workplace.
- Implement a Health and Safety Management System based on the OHSAS 18001:2007 standard for Occupational Health and Safety.
- Perform audits on health and safety practices, within the scope of our Integrated Management System.
- Systemically identify occupational and work conditions risks in written Occupational Risk Assessment Studies, for both OPAP S.A. and OPAP Services S.A.
- Have established a Security Operations Center to monitor security and facilitates communication during emergency events 24 hours a day, 7 days a week.
- Have communicated detailed instructions for emergency evacuations, fire incidents and earthquakes to all employees.
- Conduct regular company-wide evacuation exercises, with two exercises conducted in our premises in Athens and Thessaloniki during 2019, where all employees participated.
- Improved building facilities services provided and upgraded existing infrastructure.
- Improved the air quality of our offices by modifying the systems, to optimize their efficiency.
- Work closely with other teams in all relevant actions needed to successfully pass all ISO audits and maintain certificates.

Employee Accidents



*Data for 2017 and 2018 refer to the companies OPAP S.A., HELLENIC LOTTERIES S.A., OPAP SERVICES S.A., TORA DIRECT S.A., HORSE RACES S.A. and TORA WALLET S.A.
 *Data for 2019 refers to OPAP Group.

Health and safety 2019 highlights

- No losses of OPAP or OPAP partners' employees.
- **573** employees were trained on health and safety issues.
- **2,490** training hours on health and safety issues.
- No high incidence or risk of disease associated with the employees' work. This was confirmed by the fact that no occupational diseases among our employees occurred.
- No serious accidents involving OPAP employees took place.
- No incidents involving a female employee took place.
- No legal actions regarding health and safety issues were imposed.
- No fines or sanctions were imposed by the respective authorities.
- Received the Silver Award for the "Activities for Building Health & Safety Corporate Culture" category at the Boussias Communication 2019 Health and Safety awards.

Wellness and Supportive Initiatives

Aiming to develop our employees, we continue offering high-level benefits and organizing actions that further improve our work experience. Within this context, the Health, Safety and Wellbeing Team (OPAPWellness Team), was established in 2018 and continued its activities in 2019, with the aim to raise awareness and implement initiatives that foster and support health, safety and wellbeing for all. The team comprises of members of the People Team and the Quality Management Systems Team, external partners, and OPAP employees.

In 2019, OPAP continued the supportive OPAP Employee Assistance Program for its employees and their family members in collaboration with a specialized and experienced provider. The program supported 335 employees and family members through 25 informative and interactive workshops and sessions in Athens and Thessaloniki in order to help our employees define, address and resolve key issues that affect them (such as nutrition, stress management, working relations crisis/conflicts management and parental and maternity issues). Employees and their family members may seek assistance in relation to personal matters and relationships, through a dedicated support line, 24 hours a day, 7 days a week.

At the same time, for a second consecutive year, personal safety and self-defense lessons were offered to our employees. Participants had the chance to acquire safety tips and attended demonstrations of basic self-defense exercises to enable them to prevent potential risks and be able to protect themselves under any situation.

Also, we continued, in collaboration with the Red Cross a two-day First Aid seminar where our employees acquired useful knowledge on basic First Aid practices, learning how to act and what to avoid in a case of emergency, receiving a 5-year certification at the end of the program.

In response to our people's needs and their interest on health, safety and wellbeing we launched the OPAPWellness awareness sessions. In 2019, 8 sessions on well-being took place in our Headquarters. Doctors, scientists and leaders in relevant knowledge fields accepted our invitation and presented inspirational speeches on topics such as "Safe driving behavior" by Iaveris, "Effects of Smoking" by two doctors, "Nutrition and health" by A. Papalazarou, "Breast cancer prevention" by doctors and social workers etc. The level of participation was high and so was the level of satisfaction of our people at 94%.

Lastly, our dynamic OPAPWellness activities continued with the aim of promoting Sport and Wellness. In 2019, we organized physical activity initiatives, such as Internal 3-on-3 Basketball, Ping Pong and Table Soccer Championships that attracted the participation of our people.

335

employees and family member supported by OPAP Employee Assistance Program

25

informative and interactive workshops and sessions conducted in Athens and Thessaloniki

8

sessions on well-being took place



F.4 DEVELOPING OUR PEOPLE

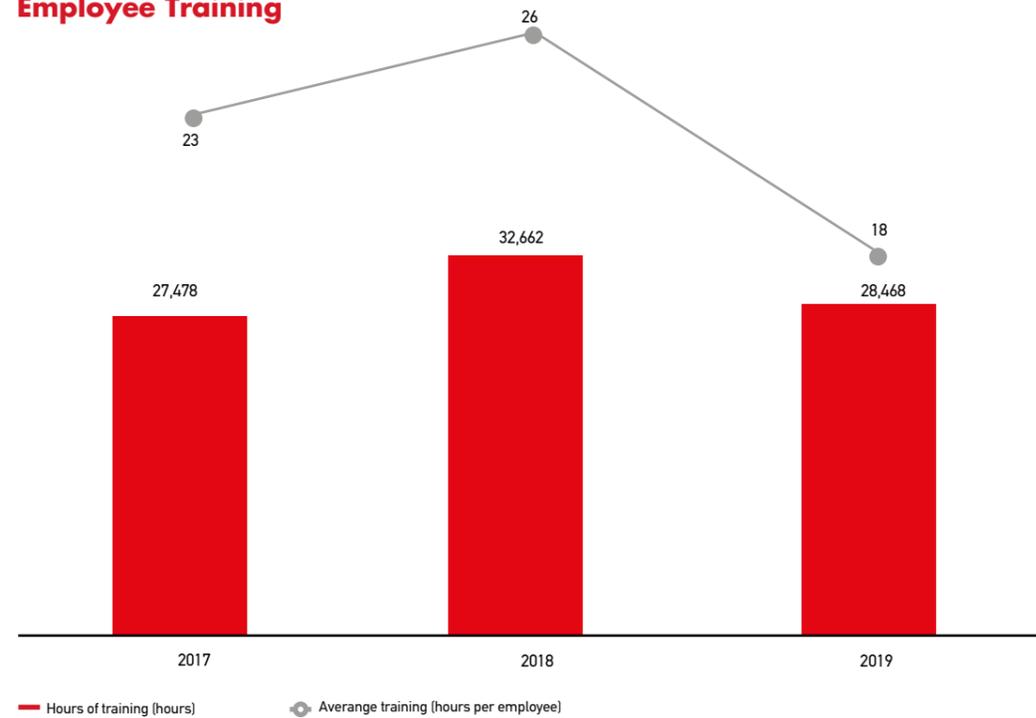
F.4.4. Training and Development

The need to connect our people's training and development with the organization's strategic goals and results led to the creation of OPAPAcademy in 2016, through which we cultivate the development of a common communication language, a single corporate culture and an integrated customer-centric approach towards the internal and external customer. The priorities of Opapacademy are:

- Developing a culture of continuous learning and evolution.
- Creating and maintaining a high-performance mindset.
- Empowering the leadership team.
- Talent development.

Our objective is to train our employees on issues and skills that are linked to their personal development, through various means such as classroom trainings, e-learning trainings, conferences, coaching and on-the-job training by their supervisors.

Employee Training



*Data for 2017 and 2018 refer to the companies OPAP S.A., HELLENIC LOTTERIES S.A., OPAP SERVICES S.A., TORA DIRECT S.A., HORSE RACES S.A. and TORA WALLET S.A.
 *Data for 2019 refers to OPAP Group.

In 2019, the training hours were transitioned to a blended learning approach including both classroom, on-the-job, and e-learning training. The efficiency of online training decreases transactional training hours as information is provided in a structured digital platform, which is typically more condensed than traditional classes. This has resulted in a decrease of our hours of training for 2019.

Training 2019 highlights

- 84% of our employees received training.
- 321 training courses were conducted.
- 70% of our employees in Greece* were trained to develop long-term competencies, in addition to their current responsibilities, on skills such as Management Negotiation, Finance for Non-Financials and PMP Time Management.
- The Opapacademy participants' feedback satisfaction rate reached 90%.
- The total cost of training courses was approximately € 340,000, with a shift in in-house development of training sessions this year.

*Data refer to OPAP operations in Greece, excluding Neurosoft.



E-Learning

Since 2017, our Opapacademy e-learning hub (e-learning platform) has helped our employees enhance their skills and competencies through blended learning, which includes numerous online modules both compulsory and optional. Among the lessons that have taken place over these years are Health and Safety, Microsoft Office and Responsible Gaming.

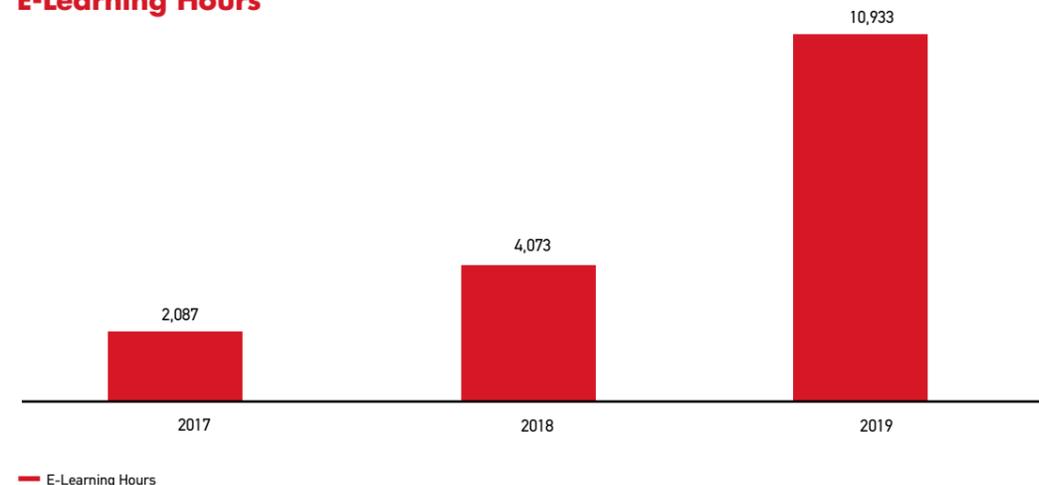
In 2019, we focused further on increasing blended learning methods, which encompass learning solutions via the traditional classroom training as well as enhanced e-learning. In this context, Opapacademy, along with the corporate culture, transitions to adapt to the era of digitization. During 2019, around 39% of the total OPAP employees training hours were carried out through e-learning training courses, in comparison to 16% during 2018. Moreover, the percentage of unique e-learners for 2019 was 91%, which means that 91% of our people participated in at least one e-learning activity. Amongst others, major lessons launched during 2019 were Anti-Money Laundering, Code of Conduct, GDPR, Business English, Earthquake Protection Measures, etc.

At the same time, following the successful launch of our Online Development Centers in 2018, we continued the program and updated our libraries in 2019. The new libraries included 24 courses on a great variety of soft skills, promoting our efforts to enhance knowledge, skills and competencies. More specifically:

- We offered 16 lessons for all OPAP Professionals focusing on the development of teamwork and professional skills.
- We offered 8 lessons as part of a demanding training program adapted to meet the needs and demands of our Management Team.

In addition, we launched a new series of eLearning courses focusing on the UN World Days, aiming to increase awareness and understanding on the purpose of this proceeding for our people. Some of the lessons included in the series were World Earth Day, No Tobacco Day, World Blood Donor Day, World AIDS day, etc.

E-Learning Hours



Classroom Training

We conducted the majority of our classroom training courses at our two state-of-the-art training centers located in our headquarters in Athens and our building in Thessaloniki, which house 100 and 40 seats respectively. Moreover, many of the training courses conducted during 2019, were created in-house from our Learning and Development Team, focusing on satisfying corporate needs and challenges on soft skills.

In 2019, we implemented a broad range of training programs emphasizing:

- Soft skills (e.g. Management, Leadership, Negotiation, Time Management, Presentation Skills, Customer Service Skills, Working in Teams).
- Technical skills (e.g. Finance for non-Financials, Accounting Fundamentals, Business Analytics with Big Data, VMware).
- Certificates (e.g. CFE, ISTQB).
- Information Security Awareness Sessions: weekly informative sessions with rich themes in the context of information protection, aiming to increase preparedness and vigilance against dangers of the digital age.

E-Learning Highlight

In 2019, our e-learning platform was recognized for its creativity, motivation and investment by the Annual HR Award, with a silver award for the category Technology, e-learning and integrated HR MIS.



Induction Program Training

In order to inform and educate our employees on issues related to our Teams, Products, Strategic Priorities, Core Principles and Values, we continue the implementation of our extensive Induction Program. All newly hired employees participate in the Induction Program, within the first month of their employment, which specifically addresses the following:

- Company overview and history.
- Vision and Values.
- Company strategic priorities.
- Product knowledge.
- Code of Conduct.
- Health and Safety.
- Awareness programs on Responsible Gaming, Information Security and the Integrated Management System.
- Teams mapping and team activities.
- Field visits, including two-day visits to OPAP agencies, PLAY Gaming Halls and the Protypo Store.

In 2019, the induction program was successfully completed for 100% of newly hired employees. The program was expanded to also include our interns who participated in our 2019 internship program, with 100% of them completing the program.

Academies Focusing on Individual Development

In 2019, we were able to run five major programs focusing on individual development.

OPAPACADEMY STEPAPI COACHING PROGRAM

This personalized Coaching Program, superseded last year's Leadership Path Program for the Directors of the Group. The program was created to help participants further develop their leadership and managerial skills, in a personalized and focused manner, through one-to-one coaching sessions and follow-up actions.

OPAPACADEMY LEADERSHIP PATH DEVELOPMENT PROGRAM

After its successful implementation last year, we continued this 5-month development program for newly appointed Directors of the Group, to help them develop their leadership and people management skills.

OPAPACADEMY MASTERING YOUR MANAGEMENT SKILLS PROGRAM

This program was designed for the Managers of the Group to help them develop their management and people leading skills.

OPAPACADEMY CUSTOMER SERVICE OVER THE PHONE PROGRAM

The entirety of this program was designed in-house, specifically for all our people serving internal and external customers via phone, e.g. Contact Center Agents. The aim of the training was to develop excellent customer service skills via phone, focusing on specific challenges that participants face during their day-to-day work.



Annual Performance Management and Development Process

OPAP carries out an annual performance management and development procedure for all its employees. The process takes place after the end of the calendar year, where the performance of employees' individual targets for the previous year are assessed. In addition, employees' performance targets for next year and individual development plans are set. Key Program elements are:

- Establishing a Common Competencies Framework for all employees
- All employees to have Individual Goals or Performance Standards based on their hierarchical level
- All employees to have Development Plans

In 2019, we continued the online implementation of our annual performance management and development process through our new "PeopleOnline" platform. All employees received a formal performance review.

Enhancing Internal Career Development Opportunities

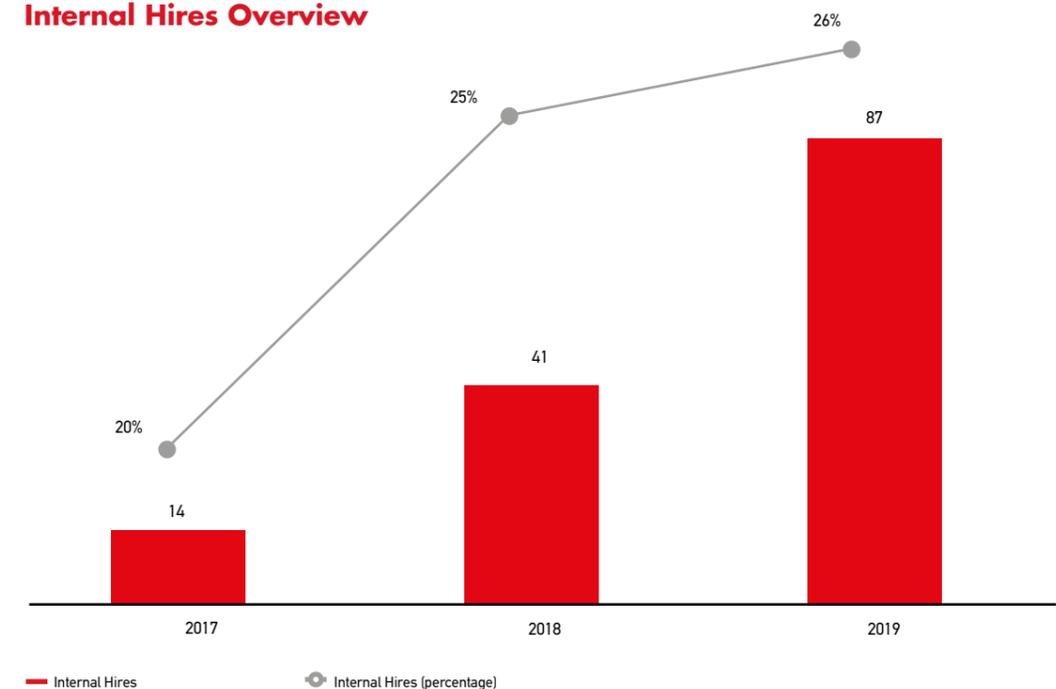
In 2019, by establishing the Internal Career Development Opportunities Procedure, the People Team based on the Employee Survey committed to give priority to the existing human resources for internal staffing, through transparent and meritocratic processes. This Procedure aims to assess and select suitable candidates considering their knowledge, abilities and personal traits, who will be recruited and remain in the Group, becoming high performance employees.

We aim to retain our employees and build on talent, by offering development opportunities and supporting the next steps of their professional careers within OPAP companies. Therefore, our people are able to fully utilize their skills and gain new knowledge, develop new professional skills and further understand the Group's operations through their career.

We consider staffing options using the existing employee database and by announcing job openings on OPAP's corporate intranet, calling interested persons to apply. In 2019, we enhanced the PeopleOnline platform with the "Careers" module, which offers all OPAP employees the chance to grow within OPAP and advance their careers through a digital experience.

In 2019, we published 87 internal job openings of all levels on our corporate intranet. The response was striking as we received 289 applications from employees throughout the whole Group (185 in 2018) resulting in a 56% increase in the participation rate. 87 OPAP colleagues were successfully transferred to new roles internally, enhancing their career, covering 26% of 332 total job openings.

Internal Hires Overview



Supporting our Society

Striving for a better future

Our objective

We believe that our role in society transcends our business activities and we have the responsibility to support social growth and prosperity. Thus, we are committed to supporting and benefiting various different stakeholders and underprivileged social groups, facilitating our supply chain's growth and responsible operation, as well as protecting the environment and reducing our potential impact on climate change and resource usage.

Key achievements in 2019

- Completed the renovation of the 4th floor at the "Aghia Sophia" Children's Hospital and the 2nd floor (Wing A) at the "Panagioti & Aglaia Kyriakou" Children's Hospital.
- Recruited more SMEs in the "OPAP Forward" program with the objective of creating a team of 50 SMEs.
- Ensured that at least 20% of personnel were exposed to environmental awareness initiatives, such as classroom trainings, e-learning courses or monthly newsletters on environmental matters.

Key targets for 2020

- Complete the renovation of "Aghia Sophia" 3rd floor Cardiology Unit (570 m², 20 beds) and "Panagioti & Aglaia Kyriakou" 3rd floor ophthalmology and otolaryngology Unit (610 m², 24 beds).
- Recruit more SMEs in "OPAP Forward" program.
- Continue implementation of recycling, environment and energy programs.

CHAPTER F.5

In this section

1. Responsible Donations and Sponsoring
2. Responsible Procurement
3. Environmental Impact

Our progress against 2019 targets

100%

ACHIEVED



F.5 SUPPORTING OUR SOCIETY

F.5.1. Responsible Donations and Sponsoring

Contributing Responsibly to our Society's Needs

OPAP's mission to create value for its stakeholders emanates from our formal mandate to support social growth and prosperity. We contribute through our social support programs, donations and sponsoring activities. We collaborate with numerous foundations and charitable organizations, receiving public recognitions as well as accredited certifications for our work.

Our social support initiatives focus on three main pillars, namely sports, health and employment. In addition, we continue our long-standing commitment towards responsible gaming and our work supporting sensitive social groups and communities.

Societal Support Focus Areas



Societal Support Program

In recent years, we have made significant financial contributions, striving to make a difference through large-scale initiatives and thus, to contribute to the development of society, secure a better future for the younger generation and have a long-lasting positive impact in the countries we operate in. In 2019, we invested € 25 million to implement 790 activities. We estimate that more than 2.9 million people benefited from our activities.

€25 M

financial investments

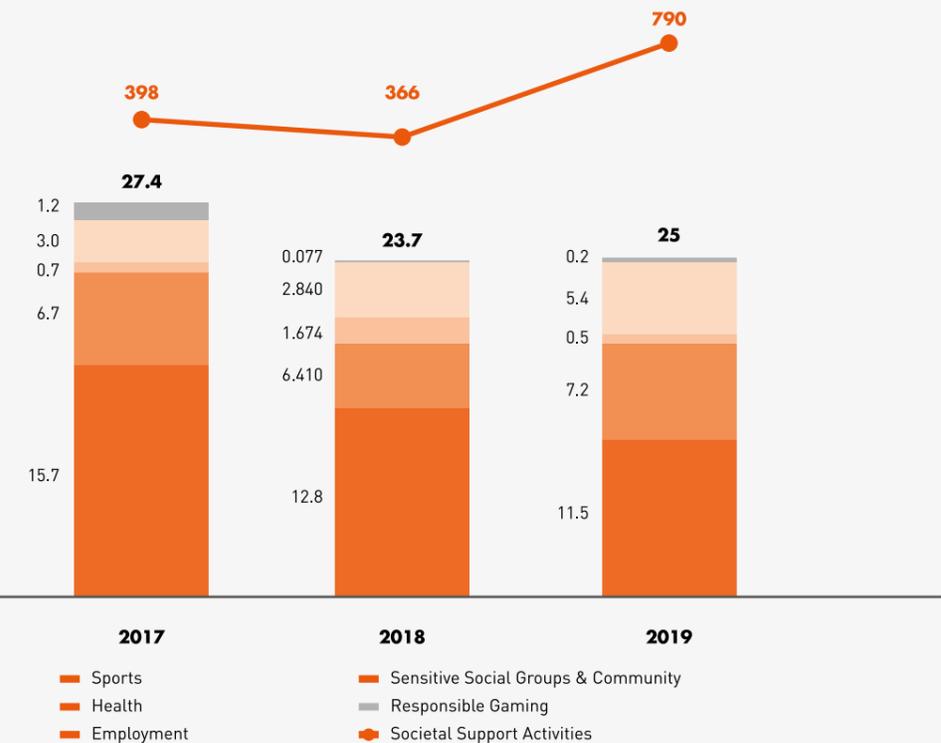
790

activities

2.9 M

people benefited

Societal Support Programm - Investments per focus area & support activities (€ million)



OPAP acting as a “responsible citizen”

We operate in local communities, respecting all citizens' well-being. We are proud to report that, in 2019, we had:

No

Operations

with significant actual and potential negative impacts on local communities and our society.

Cases

of human rights incidents affecting local community.

Cases

of disputes with local communities.

Complaints

or legal actions related to our society impacts.

Relevant fines

or other sanctions imposed by the respective authorities.

Taking measures to ensure responsible sponsoring

We take measures to ensure that donations and sponsorships are responsibly used, in line with the requirements for which they were provided. More specifically:

- We require the recipients of donations and sponsorships to submit sufficient evidence and documentation for their sponsored activities, before we grant them any funds.
- In case of construction projects, we perform on-site inspections and request photographs and other related documentation to ensure that these projects have been performed as agreed.
- In case of sponsorships, an independent contractor conducts monitoring visits and reports any findings to OPAP.

Recognizing the impact of our sport sponsoring practices, both at a local and at a national level, we apply several responsibility practices in our sponsoring contracts with sport teams, such as:

- We include a clause to invest approximately 20% of each contract value to support young people.
- We include a clause against violence (since 2010) to enhance the pivotal component of safety and security in stadiums (e.g. installation of cameras and turnstiles), with relevant clauses being included in most new sponsorship contracts within 2019. In 2019, we imposed over € 200,000 in penalties for incidents of violence in sport stadiums, which were reinvested to enhance safety measures.
- We cooperate with an independent auditing company to monitor expenditures in all contracts.
- We recursively monitor expenditures in centrally managed contracts.

59%

of people asked identified OPAP as the most recognized company in Greece in terms of social support activities.

68%

of players asked verified that they are aware of OPAP's leadership in corporate responsibility.

77%

of people asked identified OPAP as an accepted company by society.

No 1 priority is contributing to society

OPAP was proudly acknowledged for prioritizing its contribution to society (through strong corporate social responsibility programs) and for inviting people to its renovated network supported by honest and right professionals.

Source: OPAP 2019 surveys

Key 2019 Programs and Initiatives

“OPAP Forward” program

Our overall positive impact in the Greek economy is further enhanced by our decision to support entrepreneurship, through the implementation of our integrated program “OPAP Forward”, which serves the pillar of Employment. The objective of the program is to select and provide support to fast-growing Small and Medium Businesses and as a result, to foster the creation of more job opportunities and stimulate financial prosperity in the Greek economy.

OPAP collaborates with the global non-profit organization Endeavor, to ensure the program’s effective implementation. With Endeavor’s support, the selected companies will be able to grow fast, create jobs and contribute to the growth of the economy.

In 2019, the program supported 50 SMEs from various sectors (such as retail, shipping services, food processing, technology, pharmaceuticals) by providing:

- Expert advice and strategic guidance from over 70 successful entrepreneurs and top executives.
- Extensive training by experienced consultants and business executives in key functions of business operations such as business strategy, financial management, human resources management, marketing, sales and communication.
- Access to a network of investors and financing options in collaboration with the National Bank of Greece.
- Support to design a strategic plan and expand their operations and activities in foreign markets.
- Numerous networking opportunities among participating companies and other entrepreneurs, through exclusive events such as workshops

According to data from Endeavor, the program has helped the participating companies create 1,301 new direct jobs and support 8,532 new indirect jobs through the establishment of new collaborations, while at the same time increase their total turnover by 22% (total turnover of € 113 million). In June 2019, OPAP held the first awards ceremony of the program, with great success and dynamic attendance by the business community, to award the stars that participated in the program and stood out in regard to the creation of new jobs and increase in turnover. OPAP awarded 9 companies.

Mentors of the program, who offer their services pro-bono, were also awarded. The mentor who had the most active participation in the program, offering the highest number of consulting hours to participants from 2017 to date, Dimitris Ramfos, Chief Buyer of Sklavenitis Company, received the “Top Mentor 2016-2018” award.



The total results of the 40 companies that are supported by the program, as well as the 10 new SMEs, which enrolled in the dynamic team of “OPAP Forward”, were also presented during the special event organized by OPAP and Endeavor. Ernst & Young was responsible for the categorization of the awards and the results, as an independent body.

“OPAP Forward” program 2016-2019

The supported companies participated in:

580

meetings with the mentors of the program.

194

strategic guidance sessions with the high-end professionals.

60

connections and meetings with large foreign companies.

42

educational seminars.



Children hospital renovation program

Since 2014, we have been continuing our contribution to Health, by implementing the [Children Hospital Renovation program](#) at the Children's Hospitals "Aghia Sophia" and "Panagioti & Aglaia Kyriakou".

Through this program OPAP aims to:

- Upgrade the hospitals' nursing units and outpatient clinics.
- Create a pleasant therapeutic environment to accelerate children's therapy.
- Renovate the hospitals' premises, waiting and examination rooms.
- Improve the working conditions for the medical and nursing staff.

In 2019, both hospital buildings had 64% of their renovation completed. A total of 24 renovation works that included 18 nursing units were completed, covering a total of 11,540 m2 and with a capacity of 415 beds. Specifically, in 2019, the 2nd floor, Wing A', Nursing Unit and the Renal Dialysis Unit reception area at "Panagioti and Aglaia Kyriakou" Children Hospital and the 4th floor Nursing Units at "Aghia Sophia" Children Hospital were delivered.

64%

of the renovation completed

24

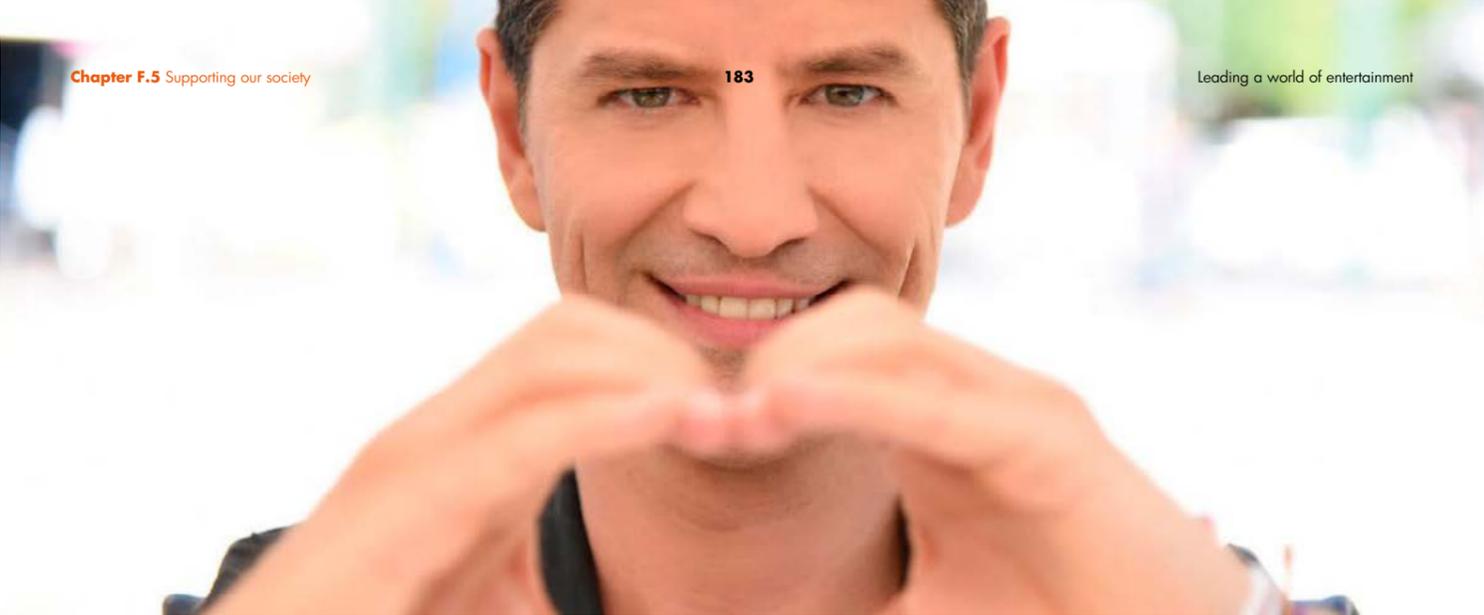
renovation works

18

nursing units completed

415

beds

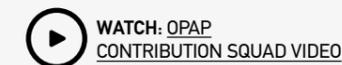


OPAP "Contribution Squad"

Aiming to engage the general public with the children hospitals renovation initiative, we have launched, since 2014, the engaging OPAP "[Contribution Squad](#)" initiative, inviting people to get involved in the project through an engaging and fun mobile app.

Around the time of the Authentic Athens Marathon, OPAP invites the general public to download –for free – the "Contribution Squad" mobile app. The app encourages the public to participate in fun challenges and gather points. OPAP translates the points into actual financial investment for the children hospitals' renovation work.

In 2019, 287,657 people downloaded the "Contribution Squad" mobile app and participated in the engaging challenges. OPAP translated a total of 3,509,000 points into actual investment for the continuation of the renovation work in both children's hospitals. It should be highlighted that this amount of money was only part of the total investment contributed by the company for the renovation project. OPAP used the "Contribution Squad" app as a tool to communicate and engage with the general public and disseminate news about its corporate social responsibility activities and initiatives.



Health: "OPAP in the Neighborhood" preventive health examinations program

Having acknowledged the need for health protection, OPAP, along with "The Smile of the Child", implements a Medical Prevention program. In collaboration with the indicated organization, OPAP operates 4 fully equipped OPAP branded mobile medical units that travel to cities across Greece (including Attica) offering preventive health examinations to both adult and underage populations.

The Preventive Medical Health initiative is part of the new corporate responsibility program "OPAP in the neighborhood" which, aims to respond to significant local community needs, such as the protection of adults and children's health, through preventive health screenings.

The fourth Mobile Multi-Medical Unit, "HIPPOCRATES", was added to the program in 2019. It is staffed with volunteers, doctors, social workers and nursery staff and includes the following fully equipped medical units:

- Pediatric Unit
- Dental Unit
- Ophthalmology Unit
- Otolaryngology Unit

In 2019:

- 24,954 kilometers distance were covered by our Health Mobile Units
- 11,963 participants were examined
- 99 locations across Greece were visited

"OPAP in the Neighborhood" program 2018-2019

42,185 km

distance were covered by our Health Mobile Units

21,891

participants were examined

151

locations across Greece were visited



"Wishing Ornaments" program

Since 2014, OPAP has been standing by the side of NGOs across Greece, that support children in real need, through the "Wishing Ornaments" initiative. The aim of this initiative is to make everyone part of a greater effort, through the fulfillment of simple child wishes. At the same time, OPAP implements infrastructure projects for the children's support organizations, to improve their quality of life.

In 2019, we invited the children supported by "The Smile of the Child", "SOS Children Villages", "Chatzikonsta Foundation" and "Together for Children" organizations to draw their wishes on a simple piece of paper. During the Christmas season, these drawings were exhibited in high traffic Athens and Thessaloniki Malls, where people could choose a child's wish they would like to make true by buying the respective gift. Additionally, for the very first time, people across Greece had the opportunity to fulfill children's wishes through the "Contribution Squad" mobile app.

In total, 10,036 children's wishes came true. The gifts were delivered during a very special event with the participation of well-known celebrities and athletes as well as OPAP employees. Additionally, OPAP proceeded with eight (8) infrastructure works for the participating organizations, which included the:

- upgrade of building facilities in the Kareas, Maroussi and Peristeri "The Smile of the Child" houses
- construction of a small playground for the "The Smile of the Child" house in Kavala
- installation of a heating network for 2 "SOS Children Villages" houses in Vari
- purchase of special equipment for the "Together for Children" therapeutic swimming program
- building repairs of damage caused due to the July 2019 earthquake in "Together for Children" premises
- development of a study area for the "Chatzikonsta Foundation".

"Wishing Ornaments" program 2014-2019

32,319

children's wishes fulfilled

38

construction works completed for NGOs across Greece

“OPAP Sports Academies” program

Having set as a priority to build solid foundations and create value for future generations, we continued the “OPAP Sports Academies” program for the fifth year. Our objective is to instill the values of fair play, devotion, respect and team work in children.

Since the launch of the program in 2015, we have accomplished prosperous results towards our effort to upgrade the athletic education standards. Indicatively:

- 210 amateur football academies participated in our program
- 36 Sports Academies Festivals have been organized all over Greece (such as in Heraklion, Rethymnon, Patras, Argos, Thessaloniki, Peristeri, Ioannina, Xanthi, Volos, Larisa, Katerini and Kallithea).
- 4 OPEN Sports Festivals for children up to 12 years old have been organized in Heraklion, Rethymnon, Patras and Volos
- Over 40,000 children have participated and been supported through the program’s educational initiatives, experiential activities and sports festivals.
- 475 hours of coaching and 4,000 training hours for parents, children and coaches have been carried out.
- Approximately 10,000 children, between the ages of 6 and 12, have been informed on healthier nutrition.
- Over 32,000 parents have been informed and supported on issues related to children’s psychology, nutrition and first aid.
- 26,000 balls, 125 sets of training equipment, 15,100 pairs of shin guards and 7,000 child-size identification markings (badges) have been distributed to the participating academies.
- Over 28,000 children and parents/guardians have participated in the several activities and sports events, organized within the context of our participation in the “European Sports Week #Be Active” that ran for the fourth consecutive year. This is an initiative from the European Commission that aims to promote sport and physical activity across Europe, supported and enacted by the Ministry of Culture and Sports, General Secretariat of Sports.



In 2019, the program has expanded to include basketball by recruiting 50 amateur basketball academies with 5.000 children from all over Greece. Those academies were required to apply for participation in the program and were selected out of 132 academies after a detailed and transparent evaluation process. The academies that apply are all amateur leagues, have an active academy for children up to 12 years old and either a men’s or women’s team and are officially registered to the Hellenic Basketball Federation.

“Sports Academies” program 2019

178

amateur academies, in 49 regional units, were supported

10

Sports Academies Festivals were organized across Greece

4

OPEN Sports Festivals for children were organized

18.000

young athletes were supported

1.000

academy coaches were provided ongoing consultation and training, by continuously enhancing their technical knowledge, through workshops and training sessions

28.000

parents were supported on psychological, pediatric and nutritional issues



MAD for a Cause: We share smiles with children in need

With the key objective of further engaging the general public with good causes, we launched a new initiative through our "Contribution Squad" application in collaboration with MAD TV.

More specifically, successful music artists donated personal items through the Contribution Squad app which people could claim by participating in fun games and collecting enough points in the app. All the points collected were used by OPAP to support the wishes of severely sick children from "Make A Wish" organization.

In total, OPAP was able to make the wishes of 6 children with severe illnesses a reality through the MAD for a Cause campaign.



OPAP Music "All Star Charity Concert"

Entertainment is at the heart of OPAP's business and we constantly strive to deliver new fun experiences for all our customers, through a number of different initiatives. In this context, we organized a charity concert in Markpoulo Park for a good cause.

Fan favourites Sakis Rouvas, Elena Papparizou and Eleni Foureira took the stage giving a unique show to more than 12,000 attendants. OPAP, through the concert, supported the work of Make a Wish Greece, making children's wishes a reality.

Grand Sponsor of the Hellenic Paralympic Committee

OPAP is committed to promoting inclusion, diversity, and excellence, both in the workplace and in the world of competitive sports. As the Grand Sponsor of the Paralympic Committee since 2011, we are proud to participate in the effort of providing opportunities to Paralympic athletes and increasing awareness and popularity of sports for people with impairment.

The Hellenic Paralympic Committee is responsible for developing and growing the Paralympic Movement in Greece as well as the selection of athletes in order to form the Greek National Paralympic Team, which participates in Paralympic Games and National or International Championships. It supports and motivates people with physical and kinetic disabilities, especially young people, to participate in sports through daily training at a high level.



CONTRIBUTING TO THE CYPRIOT SOCIETY

OPAP Cyprus has a strong relationship with the Cypriot society, since its first days of operation. Its core business activities are integrated with its corporate responsibility mandate, through the implementation of societal support programs, aimed at creating value for society and improving citizens' quality of life.

OPAP Cyprus's main objective is the creation of added value to the community of Cyprus. We focus our efforts on the following 5 pillars:

- **Sports:** OPAP Cyprus, contributes to the development of Sports in Cyprus by sponsoring numerous federations, sports associations and athletes. We aim to foster the ideals of sport, fair play and decent competition
- **Health:** We contribute to the upgrade of Cyprus' offered health services
- **Education:** OPAP Cyprus stands next to the country's new generation, by supporting competent bodies and initiatives, aimed at improving the quality of education offered to the youth of Cyprus.
- **Culture:** We are a major sponsor of many cultural events.
- **Environment:** OPAP Cyprus, respects the environment and works towards its protection, organizing actions focusing on a cleaner, more beautiful and humane Cyprus.

50 YEARS OPAP CYPRUS: CHARITY GALA IN SUPPORT OF CRCS CHILDREN THERAPY CENTER "STELLA SOULIOTI"

OPAP Cyprus celebrated its 50th anniversary with a gala event dedicated to children, fully encompassing its long-standing relationship with Cypriot society. On the 13th of November 2019, the company held a charity Gala that both commended OPAP's growth in the last 50 years while also supporting CRCS Children Therapy Center "Stella Soulioti".

All of the funds raised by the charity gala were donated to support the CRCS Children Therapy Center, the only one of its kind in Cyprus. The center treats more than 100 children aged up to 22 years old that live with severe physical disabilities and offers a variety of medical and therapeutic care services.

The event raised over 204 thousand euros, the largest recorded contribution from a single event, for the commendable efforts of the CRCS Children Therapy Center "Stella Soulioti".

Cultivating the Importance of Volunteer Contribution Among our Employees

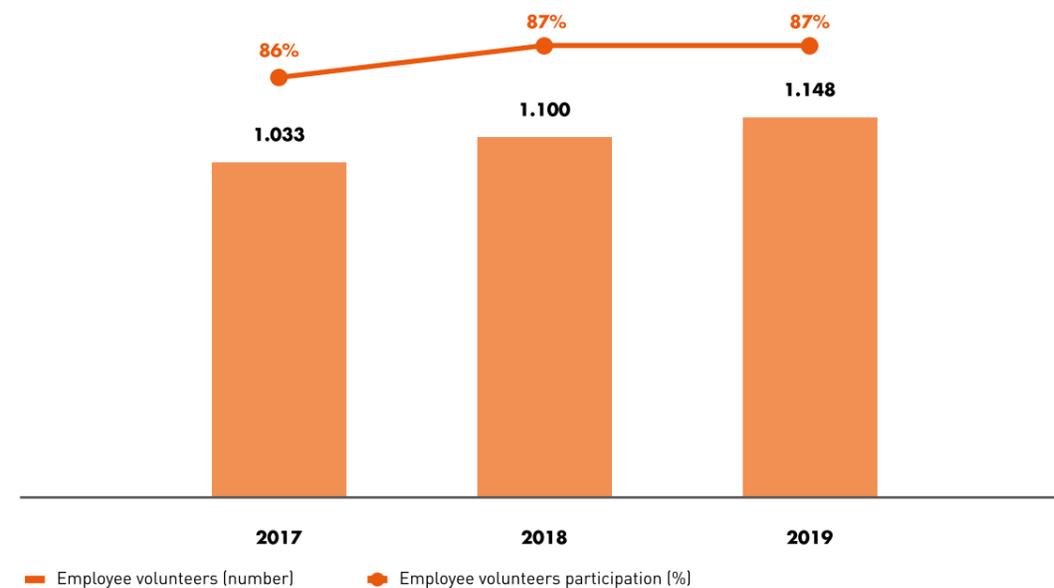
We believe in communicating the importance of volunteer contribution and cultivating the spirit of volunteering among our employees. We encourage our employees to utilize their skills in creating lasting benefits for society, as well as integrating the concept of responsibility in their way of thinking and behaving.

As our engagement with our communities continues to grow, it is our responsibility to turn our employees into enthusiastic contributors of initiatives and programs supported by OPAP, responding to the need for the wider well-being. We consequently promoted a series of volunteering events and facilitated employees' participation within 2019 with 87% of our employees participating in activities in Greece, such as the following:

- Voluntary blood donation drives.
- The "Wishing Ornaments" initiative, enabling OPAP employees to make the wishes of children in need come true.
- The 37th Athens Marathon with a growing number of employees comprising the OPAP Running team each year and offering their support to the renovation of Children's Hospitals "Aghia Sophia" and "Panagioti & Aglaias Kyriakou" through the Contribution Squad CSR mobile app.
- Participation in "Race for the Cure®" in Athens and "Sail for Pink" in Thessaloniki, organized by the Pan-Hellenic Association of Women with Breast Cancer "Alma Zois", aiming to raise awareness on the prevention of breast cancer.
- Collection of gifts by employees for the children of the Ark of the World, non-profit organization.
- Hosting yearly Christmas and Easter Bazaars in our headquarters with participating non-profit organizations to promote corporate responsibility within OPAP.

For one more year, our People lived the joy of contribution, offering hope and support through their participation in important causes

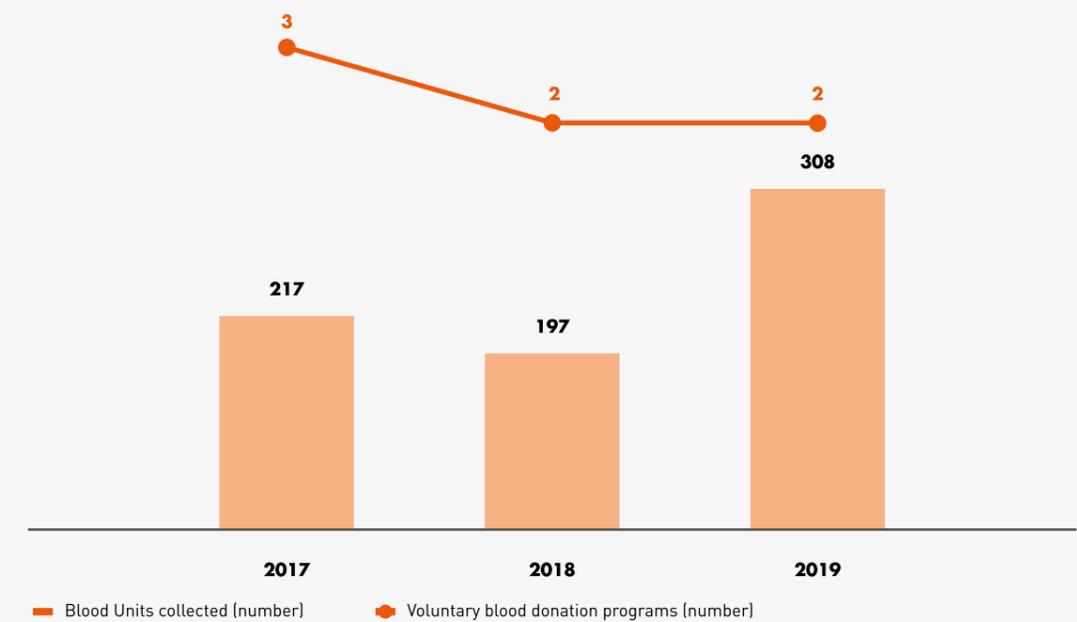
Employee participation in societal support activities



VOLUNTARY BLOOD DONATION

In 2019, we gathered 308 blood units from 2 voluntary blood donations to support the needs of employees, their families, as well as society in general, with 18.8% of gathered blood units utilized for community members' needs. In total, 342 people participated

Blood donation activities



F.5 SUPPORTING OUR SOCIETY

F.5.2. Responsible Procurement

We fully acknowledge that our suppliers' activities and actions can influence our own responsible operation and therefore strive to build a sustainable supply chain. We interact with our suppliers in a transparent and objective manner and offer equal opportunities to all. Our list of suppliers includes suppliers who offer sales and marketing services, office consumables, retail agency consumables, IT infrastructures and applications, telecommunication services, facility services and logistic services.

We utilize our outreach and size to support the local economy in the areas we operate, by collaborating with local suppliers and purchasing locally produced products and supplies. More specifically, in 2019 we:

- Collaborated with 2,923 suppliers throughout Greece and abroad, with approximately 91% of them being local suppliers (2,662 local suppliers).
- Spent 64% of our total procurement budget to local suppliers.

At the same time, we aim to treat our suppliers fairly and adjust our payment terms and bank guarantees to market conditions, by taking into consideration the current financial situation in the Greek market. The payment time of contracts is performed according to the contractual terms or within 60 days from invoicing.

Alocation of purchases per region



Influencing Positively our Supply Chain

Being one of the largest companies in Greece, our size has created the moral obligation to systematically disseminate, deploy and promote the principles of corporate responsibility throughout our supply chain.

Suppliers are expected to operate according to the respective legislative provisions. Therefore, we have included a clause in all formal tenders and agreements with our significant suppliers with an annual spending of over € 50,000, which specifically states the requirement to comply with labor, environmental and occupational health and safety laws and regulations. In 2019, 39% of significant suppliers signed contracts with contractual clauses on sustainability issues (e.g. labor practices, environmental issues, impacts on society, human rights such as child, forced and compulsory labor).

In 2019, OPAP's Supplier Code of Conduct was communicated and signed by all suppliers who signed contracts or participated in tenders with an annual budget over € 100,000.

We maintain a registry of our active suppliers with updated financial and business data on an annual basis, including potential certifications according to ISO 9001, ISO 14001, ISO 27001, OHSAS 18001 and/or other standards.

Becoming more conscious of the environmental and social impact of products acquired, we utilize the registry information mainly regarding suppliers providing products and services with increased environmental and societal impact, such as cleaning and security services.

Evaluating our Suppliers

Since 2017, we have adopted a systematic approach for our annual supplier evaluation process, which includes:

- Quality evaluation for all our significant suppliers, based on the total turnover value and their strategic importance.
- Environmental and health and safety evaluation for our significant suppliers based on their field of operation.

At the same time, we may perform ad-hoc supplier evaluations in cases of specific business requirements (e.g. as part of an upcoming large tender, contract renewal or potential suppliers).

Materializing our supply chain approach into practice within 2019:

- 100% of new suppliers (with contracts over € 50,000) signed that they comply with respective environmental, labor, human rights or society legislative provisions. No formal audits for new suppliers regarding the above issues were conducted.
- 102 significant suppliers were assessed for environmental and occupational health and safety impacts, in Greece, without any further actions.
- There were no cases of suppliers with whom our collaboration was terminated (or not initiated) due to actual or potential compliance issues (e.g. for incidents of corruption, anti-competitive behavior, non-responsible communication or poor health and safety performance).

Supplier evaluation criteria

Type of Evaluation	Criteria
Quality Evaluation	<ul style="list-style-type: none"> • Delivery quantity • Required quality • Time accuracy • Support and communication • Know-how • Number of awards/offers • Cooperation and flexibility • Invoice Accuracy
Environmental Evaluation	<ul style="list-style-type: none"> • Environmental policy • Environmental compliance • Periodical environmental impact assessments • Measures and programs to mitigate environmental impact • Environmental violations and fines
Health and Safety Evaluation	<ul style="list-style-type: none"> • Occupational health and safety compliance • Occupational health and safety in corporate policies • Internal or external health and safety assessments • Top Management commitment to improve work environment • Health and safety violations and fines

F.5 SUPPORTING OUR SOCIETY

F.5.3. Environmental Impact

As a growing business, we are conscious of global environmental issues and work systematically towards minimizing our potential negative impact throughout our operations, by complying with current environmental legislation and relevant provisions, as well as conducting all necessary environmental impact assessments.

Managing Systematically our Environmental Impact

OPAP S.A., through its [Environmental and Energy Policy](#), is committed to conducting business in an environmentally responsible way, acknowledging that protection of the environment, energy saving and conservation of natural resources, as well as the active contribution against climate change are integral parts of responsible and sustainable business development.

As part of our certified Environmental Management System according to ISO14001:2015, we apply appropriate practices to manage our operations in a way that prevents environmental pollution, regarding both our own operations, as well as our main suppliers' operations, through specific provisions in RFPs, awards and contracts.

In this context, we systematically identify and evaluate the environmental impact of our activities. As a result, in 2019 we identified the following environmental aspects as the most important:

- Energy consumption
- Paper consumption
- Life-cycle management of hazardous materials (e.g. electrical equipment, toners, light bulbs).

To further improve our approach, we implement an Energy Management System certified according to ISO 50001 since 2018. The system assures our compliance to the energy management law (Law no. 4342/2015).

Moreover, in June 2019, an Energy Management application was installed at OPAP S.A. premises, enabling our Building Facilities Team to effectively monitor electricity consumptions at our main buildings and investigate any unusual patterns.

Identification & evaluation of the environmental impact of our activities



OPAP acting as a “responsible citizen”

We are proud to report that, in 2019, OPAP S.A. had:

No

- **Environmental**
incidents of any kind.
- **Complaints**
or accusations of violating any environmental legislation.
- **Written notices**
or legal actions by the respective authorities regarding environmental issues.
- **Relevant fines**
or other sanctions imposed, during the scheduled and ad-hoc audits conducted by the respective authorities.

Energy Consumption

Recognizing the risks and opportunities associated with climate change, we seek to reduce our energy consumption and improve overall energy efficiency. To achieve this objective, we identify the sources we can apply targeted initiatives to reduce our environmental footprint.

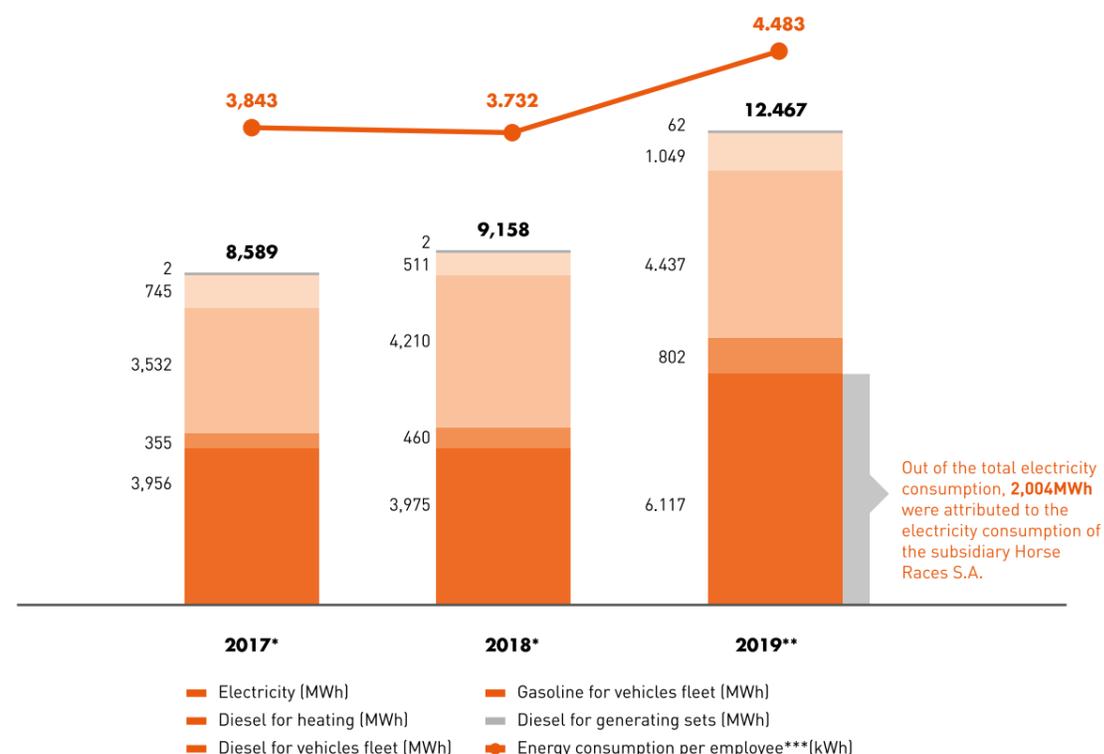
Furthermore, we systematically quantify direct and indirect greenhouse gas emissions from our operations, which primarily result from electricity consumption in our buildings and secondarily from fuel consumption for heating and business trips.

Energy Consumption

Source	2017	2018	2019
Diesel for vehicle fleet (lt)	352,006	419,579	442,226
Gasoline for vehicle fleet (lt)	81,763	56,132	115,247
Diesel for heating (lt)	35,357	45,881	79,913
Diesel for generating sets (lt)	180	180	6,180
Electricity (kWh)	3,955,805	3,974,611	6,116,513

Note: 2017 and 2018 data refer to OPAP S.A., Hellenic Lotteries S.A., OPAP Services S.A., Tora Direct S.A. and Tora Wallet S.A. 2019 data refer to OPAP Group

Energy Consumption



* Data refer to OPAP S.A., Hellenic Lotteries S.A., OPAP Services S.A., Tora Direct S.A. and Tora Wallet S.A.
 ** Data refer to the total amount of energy consumed (per fuel type) by OPAP Group.
 *** Vehicle fuels and energy consumption from Horse Races S.A. are not included.

Electricity consumption disclosed in 2019 is significantly higher than previous years, as data from all OPAP Group companies were included. The high amount of electricity consumed was attributed to the highly energy demanding activities at the stables and racing track of the subsidiary Horse Races S.A.

As part of the ISO 50001 certification, OPAP implemented an energy saving program, that was launched in 2018, we continue to use the installed state-of-the-art equipment and apparatus (motion detectors, LED lighting, solar panels), in order to significantly decrease our energy consumption. In addition, 45 diesel cars (approx. 15% of company fleet) were replaced with gasoline cars. These actions strongly reflect OPAP's commitment to minimize its environmental footprint and promote sustainable growth.

To drive improvement on our climate change impact, OPAP continued to engage into actions and programs aiming to further improve our environmental performance within 2019, mainly through the following initiatives:

- Acquired 106 new Euro 6.2 cars which is approximately 45% of our total fleet (leased and owned vehicles).
- Trained 138 new employees on environmental and occupational health and safety issues through 6 corporate induction sessions.
- Included 2 articles in relation to environmental issues in our corporate newsletter.
- Conducted two e-learning sessions regarding environmental issues, with 156 and 94 participants respectively.
- Conducted 1 open session on the World Environment Day, with 14 participants attending the session.
- Replaced lights in WC with new LED type to reduce energy consumption and minimize maintenance costs.
- Improved energy consumption monitoring by:
 - Redesigning the basement's energy cable lines
 - Installing a heating oil consumption meter
 - Installing electricity consumption meters

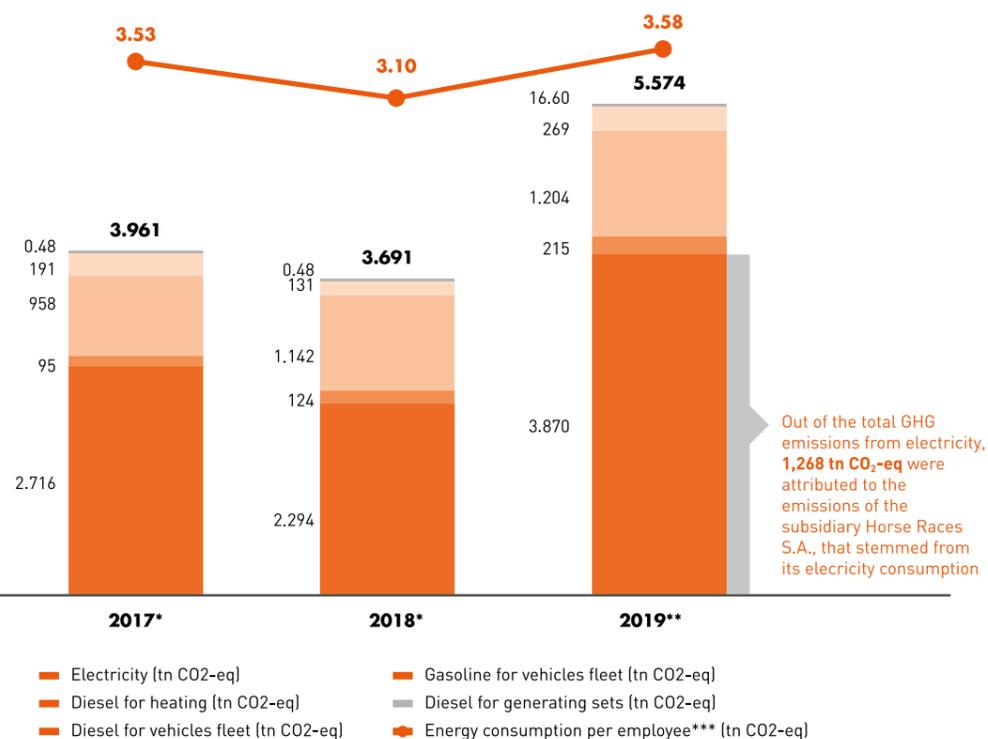
EMISSIONS

We calculate our greenhouse gas (GHG) emissions, using the best available data. We use the emission coefficients of the Greenhouse Gas Protocol to calculate the emissions deriving from the consumption of gasoline for vehicles and diesel for heating, vehicles and generating sets. The emissions from electricity consumption are calculated based on Eurostat's data for national gross electricity production and the data from the national reports submitted to the Secretariat of the United Nations Framework Convention on Climate Change (UNFCCC). Conversion factors for CH4 and N2O emissions are based on the global warming potential values over a 100-year period as described by the UNFCCC.

Emissions

Source	2017	2018	2019
Scope 1 (tn CO2-eq.)			
Diesel for vehicle fleet	958	1,142	1,204
Gasoline for vehicle fleet	191	131	269
Diesel for heating	95	124	215
Diesel for generating sets	0.48	0.48	16.60
Natural Gas	0	0	0
Scope 2 (tn CO2-eq.)			
Electricity	2,716	2,294	3,870
Total GHG Emissions (tn CO2-eq.)	3,961	3,691	5,574

GHG emissions

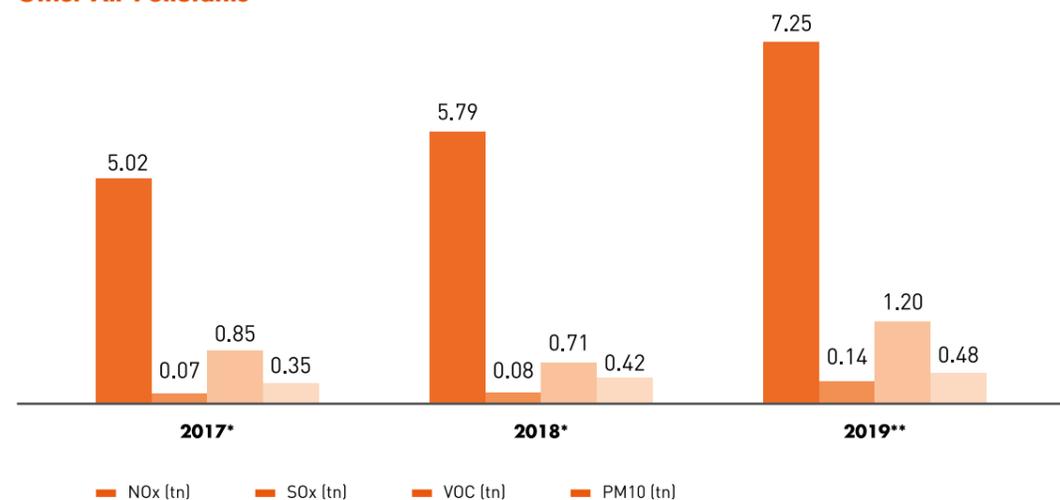


* Data refer to OPAP S.A., Hellenic Lotteries S.A., OPAP Services S.A., Tora Direct S.A. and Tora Wallet S.A.
 ** Data refer to the total amounts of GHG emissions generated (per fuel type) by OPAP Group.
 *** Vehicle fuels and GHG emissions from Horse Races S.A. are not included.

AIR POLLUTANTS

Operating in a non-energy intensive industry, our impact related to other greenhouse gas emissions (NO_x, SO_x, VOC, PM10) is limited. However, we recognize the importance of this issue at a global scale and we therefore monitor our respective impact through our direct energy consumption.

Other Air Pollutants



* Data refer to OPAP S.A., Hellenic Lotteries S.A., OPAP Services S.A., Tora Direct S.A. and Tora Wallet S.A.
 ** Data refer to the total amounts of NO_x, SO_x, VOC and PM10 emitted by OPAP Group.

Paper Consumption

In our efforts to reduce the amount of paper consumed within our premises, we uninterruptedly strive to monitor and report on our paper purchases. In 2019, we purchased around 23 tons of paper.

Life-cycle Management of Hazardous Materials

We recognize the importance of protecting natural resources and therefore operate in a responsible manner, striving to reduce waste and increase our efficiency. Consequently, we:

Monitor	Reduce	Reuse	Recycle	Properly dispose
the use of materials	the use of materials	materials	materials through licensed sub-contractors	hazardous materials

Recycling performance

Material	2017 ¹	2018 ¹	2019 ²
Paper (coupons, playslips, thermal rolls) (kg)	24,840	144,862	1,760
Office paper (kg)	10,241	10,525	10,920
Cartridges – toners (units)	341	434	243
Light bulbs (units)	440	1,039	697
IT hardware and equipment (computers, printers etc.) (units)	1,573	26,175	2,054
Furniture (units)	14	52	15
Domestic batteries (kg)	90	127	112
Plastic (kg)	40	177	83
Aluminum (kg)	15	76	70
Other non-hazardous waste (kg)	-	-	1,997,590 ³
Hazardous waste (kg)	-	-	185 ⁴

1. Data refer to the recycling performance of OPAP S.A., Hellenic Lotteries S.A., OPAP Services S.A., Tora Direct S.A. and Tora Wallet S.A.
 2. Data refer to the recycling performance of OPAP Group.
 3. The non-hazardous waste recycled pertained to effluent and manure (including spoiled straw) from the subsidiary Horse Races S.A. The waste was collected separately and treated off-site by a licensed company.
 4. The hazardous waste recycled pertained to biological waste from the veterinary clinic of the subsidiary Horse Races S.A. The waste was collected and managed by a licensed company.

OPAP S.A. performed a number of actions aiming at improving its waste management performance, as outlined below.

- Recycling programs focusing on the collection of paper, cartridges - toners, light bulbs, domestic batteries, aluminum and plastic caps from beverages, and bottled water are implemented by placing appropriate bins in our facilities, as well as marked bins for the collection of organic waste (e.g. food residues) and food packaging.
- All potentially hazardous waste (i.e. toners, electrical equipment, light bulbs and domestic batteries) is appropriately discharged through licensed contractors.
- A licensed recycling partner directly delivers our recyclable waste to specialized recycling management facilities, instead of municipal recycling bins.
- Appropriate bins for aluminum and plastic are placed in kitchens and office areas to encourage employees to separate their waste.
- All plastic cutlery, spoons and straws are replaced with biodegradable ones.
- The plastic stirrers are replaced by wooden ones.

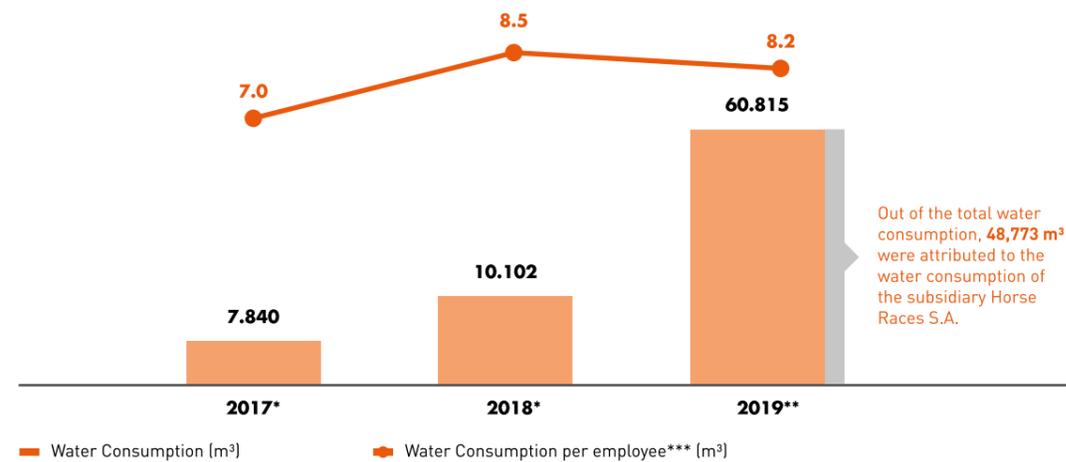
Other Environmental Impacts

WATER CONSUMPTION

Water shortage in many regions and countries around the world is an issue, which requires urgent action. Being conscious of the increasing pressure to contribute towards alleviating water scarcity, our responsible approach has led us to:

- Install water gauges in key areas of our facilities (buildings, gardens) to monitor and reduce water consumption.
- Control and ensure that no significant water leakages or discharges occurred during 2019.

Water Consumption



* Data refer to OPAP S.A., Hellenic Lotteries S.A., OPAP Services S.A., Tora Direct S.A. and Tora Wallet S.A.
 ** Data refer to the total amount of consumed by OPAP Group
 *** Excludes water consumption from Horse Races S.A.

Similar to electricity consumption, water consumption disclosed in 2019 includes data from all OPAP Group companies. The large amount of water consumed was attributed to the high irrigation and hygiene requirements of the subsidiary Horse Races S.A.

REFRIGERANTS

Acknowledging that refrigerants have a detrimental effect on the ozone layer and damage our environment, we use only environmental-friendly refrigerants in our air-conditioning systems. In 2019, 6 kg of refrigerant R134 and 15 kg of refrigerant R410A were respectively added and reported to the relevant Authorities by OPAP S.A.

BIODIVERSITY

We are aware of the alarming rate of biodiversity loss that has taken place over the last decades, due to unsustainable human-induced activities, and we acknowledge that our lives largely depend on the variety of species and ecosystems found on our planet. Taking this important environmental issue into consideration, we are proud to report that all our offices and buildings are located within urban environment without any adjacent protected areas and, therefore, are not subject to any specific biodiversity protection regulations and safeguarding measures.

Environmental guidelines for our network

In our effort to engage with our stores and subsequently protect the environment and ensure a sustainable business operation, we keep our network informed of sound environmental operations by including specific recommendations in our store development guidelines.

These recommendations include actions such as:

Replacement	Rational use	Use	Recycling
of old lighting units with new LED lighting units	of lights and electrical equipment.	of high energy efficiency equipment.	of materials (paper, plastic, batteries, TVs, electrical equipment etc.).

Appendix

CHAPTER G

In this section

- 1 About this Report
- 2 Performance in 2019 and 2020 Targets
- 3 GRI Content Index
- 4 ATHEX ESG Reporting Guide Content Index
- 5 Independent Auditor's Report
(translated from the original in Greek)
- 6 Abbreviations

G. APPENDIX

G.1 About this Report

This is OPAP's 4th Integrated Report. The report covers the financial year from January 1 to December 31, 2019 (unless otherwise indicated). Our Integrated Report aims to provide a balanced and integrated depiction of OPAP's value creation process using both financial and non-financial material.

This report covers all activities (i.e. design, development, organization, operation, handling and management for Numerical Lotteries, Sports Betting games, Horseracing Mutual betting, Passive and Instant Lotteries, and VLTs, as well as support services) of the OPAP Group.

The scope of this year's report was extended to include data for all OPAP Group companies, while there are no significant changes from the previous reporting period in the measurement methods applied in the Report.

This year's report has been restructured in line with the guidelines provided by the International Integrated Reporting Council's <IR> Framework. The social and environmental data and information included in this report have been prepared according to the new Global Reporting Initiative's Sustainability Reporting Guidelines (i.e. GRI Standards).

The separate and consolidated Financial Statements of OPAP have been prepared in accordance with International Financial Reporting Standards (IFRS) as issued by the International Accounting Standards Board (IASB) and interpretations issued by the IFRS Interpretations Committee, as adopted by the European Union and are effective as of 1 January 2018.

The Report has been developed in collaboration with [KKS Advisors](#).

In our continuous effort to improve our integrated reporting process and ensure that we follow the best practice reporting standards and meet the expectations of our stakeholders, we encourage you to forward your comments, thoughts, remarks or proposals regarding the 2019 Integrated Report to:

Mrs Georgia Lassanianou

Corporate Responsibility and Public Relations Director

OPAP S.A.

112 Athinon Av., 104 42, Athens, Greece

E-mail: g.lassanianou@opap.gr

G. APPENDIX

G.2 Performance in 2019 and 2020 Targets

Depicted below are the performance targets set for 2019 and 2020. The 2019 targets also include an index illustrating the status of their attainment as well the relevant report section pertaining to each target.

Our Games Portfolio

2019 Targets	2019 Performance
Launch TZOKER online.	• See section C.3.3 Numerical Lottery Games
Expand KINO offering through SSBTs.	• See section C.3.3 Numerical Lottery Games
Intensify our efforts in order to broaden our online portfolio.	• See section C.3.2 Betting games and C.3.3 Numerical Lottery Games

Index key: • Achieved, • In progress, • Not achieved

2020 Targets

- Introduce new game features for KINO.
- Launch a 20 Years 360° anniversary campaign for Pame Stoixima.
- Full roll-out of Live Sports Channel "Λεπτό προς Λεπτό" bringing our customers closer to the action with 16/7 live content broadcasting.
- Launch a new upgraded Retail Mobile App that will allow players to create a full (betting) slip on their mobile.
- Launch in-play push notifications, a new OPAPP feature, that aims to provide automated in-play events information to the retail Play Store players after placing a bet and scanning their ticket on their device.
- Relaunch an upgraded Racing Channel that will offer both Horse Races and Greyhound Races live from 8.00 am until midnight.

Operating Responsibly

2019 Targets	2019 Performance
Aim for 27 % of our surveyed customers to state that their customer experience was better than what they expected.	• See section E.6 Customer Satisfaction
Achieve 95% visitation rate per quarter among eligible employees, within the "Adopt a shop" program.	• See section E.6 Customer Satisfaction
Aim for 65% of the surveyed population to believe that OPAP guarantees right of operation of games.	• See section E.6 Customer Satisfaction

Index key: • Achieved, • In progress, • Not achieved

2020 Targets

- Aim for 90% of customers to state that their customer experience was the same or better than what they expected.
- Aim for 60% of our agents to state that they are rather satisfied or completely satisfied with their collaboration with OPAP.

Protecting our Players

2019 Targets	2019 Performance
Strengthen the communication strategy of Responsible Gaming to ensure players understand how to play responsibly.	• See section F.2.1 Responsible Gaming
Empower agents to detect and handle problematic playing behavior.	• See section F.2.1 Responsible Gaming
Optimize the access to referral and treatment for players exhibiting mental and psychological problems.	• See section F.2.1 Responsible Gaming
Maintain high Responsible Gaming standards in everything we do.	• See section F.2.1 Responsible Gaming

Index key: • Achieved, • In progress, • Not achieved

2020 Targets

- Set up a clear process for agents identifying and managing problematic playing behavior and further improve communication with players.
- Provide more Responsible Gaming tools to our players on our online platform (Pamestoixima.gr).
- Provide Responsible Gaming training to all network.
- Enhance OPAP Group Responsible Gaming tools in the new online regime.
- Revamp the Responsible Gaming communication strategy to ensure players understand rules and believe in OPAP's commitment to keeping them safe.

Enhancing our Network

2019 Targets	2019 Performance
Complete VLTs rollout and add 1,500 Self Service Betting Terminals along with the optimization of the setup/allocation in existing OPAP stores.	• See section F.3.1 Investment and Transformation
Continue our network development with 300 new OPAP stores and 150 OPAP store renovations.	• See section F.3.1 Investment and Transformation
Continue to develop our network, aiming at certifying 800 OPAP stores according to REX 2020 standards.	• See section F.3.1 Investment and Transformation
Secure OPAP stores network compliance on commercial standards (85%) measured across all KPIs.	• See section F.3.1 Investment and Transformation
Enhance OPAP agents' overall satisfaction (80%).	• We continue to work towards our goal of enhancing customer satisfaction (80%), reaching 64% of agents' overall satisfaction in 2019, and 68% in the 4th quarter.
Continue and evolve performance management with performance bonus schemes in 2019 for OPAP stores and PLAY network.	• See section F.3.2 Supporting our Network
Launch an e-learning training platform for PLAY store partners.	• See section F.3.3 Training our Partners
Complete PLAY game machines roll-out.	• See section F.3.1 Investment and Transformation
Enhance PLAY stores visibility with the opening of facades across the network.	• See section F.3.1 Investment and Transformation
Launch PLAY games Jackpot at OPAP stores and Play network.	• See section F.3.1 Investment and Transformation

Index key: • Achieved, • In progress, • Not achieved

2020 Targets

- Continue our network development with 200 new OPAP stores and 200 OPAP store renovations.
- Continue to develop our network, aiming at certifying 400 additional OPAP stores according to REX 2020 standards.
- Complete optimization of VLTs rollout and Self Service Betting Terminals and setup/allocation in more than 2,500 OPAP stores (total of 13,850 Live VLTs in PLAY stores and 24,366 Live VLTs in OPAP stores).
- Focus on retailer profit and loss to increase retailer profitability by 15% in OPAP stores reaching a total of 90% and 80% for PLAY stores.
- Secure OPAP stores network compliance on commercial standards (85%) measured across all KPIs.
- Launch new Customer Treatment policy across network (central agreements, manual development and food and beverage thematic events), live in at least 100 stores.
- Launch a solid and future proof audio solution for the OPAP stores network including music, sound messaging and OPAP product integration (from pilot to roll-out).
- Launch a new design of a mini OPAP store.
- Acquire glass dispensers for Scratch in all OPAP stores.
- Roll out new satellite equipment in OPAP stores.

Developing our People

2019 Targets	2019 Performance
Optimize human resources' services, following best practices and technological advancements.	• See sections F.4.1 Attract and Engage and F.4.4 Training and Development
Continue developing individual development plans via Opapacademy actions, classroom training sessions, online development centers and teambuilding.	• See section F.4.4 Training and Development
Enrich Internal career opportunities and continue the internship program.	• See sections F.4.1 Attract and Engage and F.4.4 Training and Development
Strengthen the effectiveness of internal communications channels and launch more wellness activations.	• See sections F.4.1 Attract and Engage and F.4.2 Equality and Fairness

Index key: • Achieved, • In progress, • Not achieved

2020 Targets

- Further enhance the blended learning culture, promoting eLearning while continuing with classroom solutions.
- Enhance internal career opportunities.
- Full launch of the Succession Planning and Talent Management Schemes.
- Further enhance our people's engagement and well-being.
- Bring our people closer to OPAP's brand, products, sponsorships, social responsibility with engaging internal activations and events.
- Enhance employer branding and provide a unique candidate experience.
- Boost internship and trainee programs.

Supporting our Society

2019 Targets	2019 Performance
Complete the renovation of the 4th floor at the "Aghia Sophia" Children's Hospital.	• See section F.5.1 Responsible Donations and Sponsoring
Complete the renovation of the 2nd floor (Wing A) at the "Panagioti & Aglaia's Kyriakou" Children's Hospital.	• See section F.5.1 Responsible Donations and Sponsoring
Implement the "Wishing Ornaments" initiative online and offline for all people across Greece.	• See section F.5.1 Responsible Donations and Sponsoring
Organize 10 Sports Academies Festivals across Greece.	• See section F.5.1 Responsible Donations and Sponsoring
Realize at least 3 OPEN Sport Academies festivals, accessible for all people.	• See section F.5.1 Responsible Donations and Sponsoring
Recruit more SMEs in "OPAP Forward" program with the objective of creating a team of 50 SMEs.	• See section F.5.1 Responsible Donations and Sponsoring
Continue to implement OPAP's recycling programs.	• See section F.5.3 Environmental Impact
Maintain energy and environmental certifications, exhibiting zero non-conformances.	• See section F.5.3 Environmental Impact
Ensure that at least 20% of personnel are exposed to environmental awareness initiatives, such as classroom trainings, e-learning courses or monthly newsletters on environmental matters.	• See section F.5.3 Environmental Impact

Index key: • Achieved, • In progress, • Not achieved

2020 Targets

- Complete the renovation of "Aghia Sophia" 3rd floor Cardiology Unit (570 m², 20 beds).
- Complete the renovation of "Panagioti & Aglaia's Kyriakou" 3rd floor ophthalmology and otolaryngology Unit (610 m², 24 beds).
- Recruit more SMEs in "OPAP Forward" program.
- Implement the "Wishing Ornaments" initiative online and offline for all people across Greece.
- Continue implementation of OPAP's recycling programs.
- Continue implementation of environment and energy programs.
- Maintain environmental and energy certifications, exhibiting zero non-conformances.

G. APPENDIX

G.3 GRI Content Index

OPAP's 2019 Integrated Report has been prepared in accordance with the GRI standards at "core" level.

GRI Standards	Disclosure	Section / Comments
GRI 101 Foundation 2016		
General Disclosures		
	Organizational Profile	
	102-1 Name of the organization	See sections C.1 Our Company and G.1 About this Report
	102-2 Activities, brands, products, and services	See section C3. Our Games Portfolio
	102-3 Location of headquarters	See sections C.1 Our Company and G.1 About this Report
	102-4 Location of operations	See section C.1 Our Company
	102-5 Ownership and legal form	See section C.1 Our Company
	102-6 Markets served	See sections C.1 Our Company and C3. Our Games Portfolio
	102-7 Scale of the organization	See sections F.1.1 Financial Results, F.3.1 Investment and Transformation and F.4.1 Attract and Engage
	102-8 Information on employees and other workers	See section F.4.1 Attract and Engage
	102-9 Supply chain	See sections E.1 Business Model and F.5.2 Responsible Procurement
	102-10 Significant changes to the organization and its supply chain	See section C.1 Our Company
	102-11 Precautionary Principle or approach	See sections E.3 Operating Responsibly, E. 4 Risk Management and F.5.3 Environmental Impact
	102-12 External initiatives	See sections F.2.1 Responsible Gaming, F.4.2 Equality and Fairness and G.1 About this Report
	102-13 Membership of associations	See section C.1.3 Memberships
	Strategy	
	102-14 Statement from senior decision-maker	See section A. Messages from the Chairman and the CEO
	Ethics and Integrity	
	102-16 Values, principles, standards, and norms of behavior	See sections E.1 Business Model and E.3.1 Compliance
	Governance	
	102-18 Governance structure	See section D.2 Governance and Leadership
GRI 102 General Disclosures 2016		

Stakeholder Engagement		
102-40 List of stakeholder groups		See section E.5 Stakeholder Engagement
102-41 Collective bargaining agreements		See section F.4.2 Equality and Fairness
102-42 Identifying and selecting stakeholders		See section E.5 Stakeholder Engagement
102-43 Approach to stakeholder engagement		See section E.5 Stakeholder Engagement
102-44 Key topics and concerns raised by stakeholders		See section E.5 Stakeholder Engagement
Reporting Practice		
102-45 Entities included in the consolidated financial statements		See sections C.1 Our Company, F.1.1 Financial Results, F.1.2 Financial Statements and G.1 About this Report
102-46 Defining report content and topic boundaries		See sections E.4 Risk Management and G.1 About this Report
102-47 List of material topics		See sections E.4 Risk Management and G.3 GRI Content Index
102-48 Restatements of information		See section G.1 About this Report
102-49 Changes in reporting		See sections C.1 Our Company and G.1 About this Report
102-50 Reporting period		See section G.1 About this Report
102-51 Date of most recent report		See section G.1 About this Report
102-52 Reporting cycle		See section G.1 About this Report
102-53 Contact point for questions regarding the report		See section G.1 About this Report
102-54 Claims of reporting in accordance with the GRI Standards		See section G.3 GRI Content Index
102-55 GRI content index		See section G.3 GRI Content Index
102-56 External assurance		See sections G.1 About this Report and G.5 Independent Auditor's Report
Economic Performance		
GRI 201 Economic Performance 2016	201-1 Direct economic value generated and distributed	See section F.1 Achieving Financial Results
Market Presence		
	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	See section F.4.2 Equality and Fairness
GRI 202 Market Presence 2016	202-2 Proportion of senior management hired from the local community	See section D.3.2 Meet our Executive Committee
Indirect Economic Impacts		
	203-1 Infrastructure investments and services supported	See sections F.1.3 Economic Value Generated and F.3.1 Investment and Transformation
GRI 203 Indirect Economic Impacts 2016	203-2 Significant indirect economic impacts	See sections E.2 How we Create Value, F.3.1 Investment and Transformation, F.4.1 Attract and Engage, F.5.1 Responsible Donations and Sponsoring and F.5.2 Responsible Procurement
Procurement Practices		
GRI 204 Procurement Practices 2016	204-1 Proportion of spending on local suppliers	See section F.5.2 Responsible Procurement
Material Issues: Anti-Corruption and Money Laundering		
	103-1 Explanation of the material topic and its boundary	The impacts of this issue occur within the company and its retail network. This issue can impact the company's reputation and financial performance. See section E.3 Operating Responsibly
GRI 103 Management Approach 2016	103-2 The management approach and its components	
	103-3 Evaluation of the management approach	

GRI 205 Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures 205-3 Confirmed incidents of corruption and actions taken	See sections E.3.1 Compliance and E.3.3 Anti-Money Laundering See sections E.3.1 Compliance and E.3.3 Anti-Money Laundering
Material Issue: Anti-Competitive Compliance and Behavior		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue occur within the company. This issue can impact the company's reputation and financial performance. See section E.3.1 Compliance
GRI 206 Anti-competitive Behavior	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	See section E.3.1 Compliance
Materials		
GRI 301 Materials 2016	301-1 Materials used by weight or volume 301-2 Recycled input materials used	See section F.5.3 Environmental Impact See section F.5.3 Environmental Impact
Energy		
GRI 302 Energy 2016	302-1 Energy consumption within the organization 302-2 Energy consumption outside of the organization 302-3 Energy intensity	See section F.5.3 Environmental Impact See section F.5.3 Environmental Impact See section F.5.3 Environmental Impact
Water		
GRI 303 Water 2016	303-1 Water withdrawal by source	See section F.5.3 Environmental Impact
Biodiversity		
GRI 304 Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	See section F.5.3 Environmental Impact
Emissions		
GRI 305 Emissions 2016	305-1 Direct (Scope 1) GHG emissions 305-2 Energy indirect (Scope 2) GHG emissions 305-6 Emissions of ozone-depleting substances (ODS) 305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	See section F.5.3 Environmental Impact See section F.5.3 Environmental Impact See section F.5.3 Environmental Impact See section F.5.3 Environmental Impact
Effluents and Waste		
GRI 306 Effluents and Waste 2016	306-2 Waste by type and disposal method 306-3 Significant spills 306-4 Transport of hazardous waste	See section F.5.3 Environmental Impact See section F.5.3 Environmental Impact See section F.5.3 Environmental Impact
Environmental Compliance		
GRI 307 Environmental Compliance 2016	307-1 Non-compliance with environmental laws and regulations	See section F.5.3 Environmental Impact

Material Issue: Supplier HSEQ Assessment and Practice		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue occur in the company's supply chain and are directly linked to the company's operation via its relationship with suppliers. See section F.5.2 Responsible Procurement
GRI 308 Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria 308-2 Negative environmental impacts in the supply chain and actions taken	See section F.5.2 Responsible Procurement See section F.5.2 Responsible Procurement
GRI 414 Supplier Social Assessment	414-1 New suppliers that were screened using social criteria 414-2 Negative social impacts in the supply chain and actions taken	See section F.5.2 Responsible Procurement See section F.5.2 Responsible Procurement
Material Issue: Work Positions		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue occur within the company's workforce. The issue can impact the employees' performance and engagement and is directly linked to the company's human resources practices. See section F.4.1 Attract and Engage
GRI 401 Employment 2016	401-1 New employee hires and employee turnover 401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees 401-3 Parental leave	See section F.4.1 Attract and Engage See section F.4.1 Attract and Engage See section F.4.1 Attract and Engage
Labor/Management Relations		
GRI 402 Labor/Management Relations	402-1 Minimum notice periods regarding operational changes	See section F.4.2 Equality and Fairness
Occupational Health and Safety		
GRI 403 Occupational Health and Safety	403-2 Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities 403-3 Workers with high incidence or high risk of diseases related to their occupation	See section F.4.3 Health and Safety See section F.4.3 Health and Safety
Training and Education		
GRI 404 Training and Education 2016	404-1 Average hours of training per year per employee 404-2 Programs for upgrading employee skills and transition assistance programs 404-3 Percentage of employees receiving regular performance and career development reviews	See section F.4.4 Training and Development See section F.4.4 Training and Development See section F.4.4 Training and Development
Material Issue: Equality and Fairness		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue occur within the company's workforce. The issue can impact the employees' performance and engagement and is directly linked to the company's human resources practices. See sections F.4.1 Attract and Engage and F.4.2 Equality and Fairness

GRI 405 Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	See sections D.3 Members and Relevant Experience, F.4.1 Attract and Engage and F.4.2 Equality and Fairness
	405-2 Ratio of basic salary and remuneration of women to men	See section F.4.2 Equality and Fairness
Non-discrimination		
GRI 406 Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	See section F.4.2 Equality and Fairness
Freedom of Association and Collective Bargaining		
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	See section F.4.2 Equality and Fairness
Child Labor		
GRI 408 Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	See section F.4.2 Equality and Fairness
Forced or Compulsory Labor		
GRI 409 Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	See section F.4.2 Equality and Fairness
Human Rights Assessments		
GRI 412 Human Rights Assessments 2016	412-1 Operations that have been subject to human rights reviews or impact assessments	See section F.4.2 Equality and Fairness
Local Communities		
GRI 413 Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	See section F.5.1 Responsible Donations and Sponsoring
	413-2 Operations with significant actual and potential negative impacts on local communities	See section F.5.1 Responsible Donations and Sponsoring
Material Issue: Product and Service Labelling		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary	The impacts of this issue occur at the company's retail network. The issue can induce problematic behavior and is directly linked to the company's products and services. See section F.2.1 Responsible Gaming
	103-2 The management approach and its components	
	103-3 Evaluation of the management approach	
GRI 417 Marketing and Labelling 2016	417-1 Requirements for product and service information and labelling	See section F.2.1 Responsible Gaming
	417-2 Incidents of non-compliance concerning product and service information and labelling	See sections F.2.1 Responsible Gaming and E.6 Customer Satisfaction
	417-3 Incidents of non-compliance concerning marketing communications	See sections F.2.1 Responsible Gaming and E.6 Customer Satisfaction
Material Issue: Customer Privacy		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary	The impacts of this issue affect the company's customers. The issue can impact the company's reputation and is directly linked to the company's business practices. See section F.2.2 Draw Credibility and Data Security
	103-2 The management approach and its components	
	103-3 Evaluation of the management approach	

GRI 418 Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	See section F.2.2 Draw Credibility and Data Security
Material Issue: Responsible Gaming		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary	The impacts of this issue affect the company's customers. The issue can induce problematic behavior and is directly linked to the company's products and services. See section F.2.1 Responsible Gaming
	103-2 The management approach and its components	
	103-3 Evaluation of the management approach	
Material Issue: Responsible Communication		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary	The impacts of this issue occur between the company and its stakeholders. The issue can impact the company's reputation and is directly linked to its business relationships. See section F.2.1 Responsible Gaming
	103-2 The management approach and its components	
	103-3 Evaluation of the management approach	
Material Issue: Customer Satisfaction		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary	The impacts of this issue occur between the company and its customers. The issue can impact the company's reputation and financial performance and is directly linked to its business relationships. See section E.6 Customer Satisfaction
	103-2 The management approach and its components	
	103-3 Evaluation of the management approach	
Material Issue: Network Compliance		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary	The impacts of this issue occur within the company's retail network. The issue can impact the company's reputation and is directly linked to its business relationships with its retail network. See sections E.3.3 Anti-Money Laundering, E.3.4 Addressing Illegal Gaming and F.2.1 Responsible Gaming
	103-2 The management approach and its components	
	103-3 Evaluation of the management approach	
Material Issue: Internet and Data Safety		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary	The impacts of this issue affect the company's customers. The issue can impact the company's reputation and is directly linked to the company's security practices. See section F.2.2 Draw Credibility and Data Security
	103-2 The management approach and its components	
	103-3 Evaluation of the management approach	
Material Issue: Donation and Support		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary	The impacts of this issue occur within the society in which the company operates. The issue can impact the company's reputation and is directly linked to its corporate responsibility practices. See section F.5.1 Responsible Donations and Sponsoring
	103-2 The management approach and its components	
	103-3 Evaluation of the management approach	
Material Issue: Public Involvement		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary	The impacts of this issue occur between the company and its stakeholders. The issue is directly linked to the company's business relationships and engagement practices. See section E.5 Stakeholder Engagement
	103-2 The management approach and its components	
	103-3 Evaluation of the management approach	

Material Issue: Corporate Governance		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary	The impacts of this issue occur within the company. The issue can impact the company's financial performance and is directly linked to its governance practices and principles. See section D. Corporate Governance
	103-2 The management approach and its components	
	103-3 Evaluation of the management approach	
Material Issue: Code Compliance		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary	The impacts of this issue occur within the company. This issue can impact the company's reputation and financial performance. See section E.3.1 Compliance
	103-2 The management approach and its components	
	103-3 Evaluation of the management approach	
Material Issue: Economic Transparency		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary	The impacts of this issue occur within the company. The issue can impact the company's financial performance and is directly linked to its business practices. See sections F.1.1 Financial Results and F.1.2 Financial Statements
	103-2 The management approach and its components	
	103-3 Evaluation of the management approach	
Material Issue: Corporate Responsibility		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary	The impacts of this issue occur within the company. This issue can impact the company's reputation and financial performance. See section E.1 Business Model
	103-2 The management approach and its components	
	103-3 Evaluation of the management approach	

G. APPENDIX

G.4 ATHEX ESG Reporting Guide Content Index

OPAP's 2019 Integrated Report presents information according to the Athens Stock Exchange ESG Reporting Guide.

ESG Metric ID	Metric Title	Section / Comments
Environmental		
C-E1	Scope 1 emissions	See section F.5.3 Environmental Impact
C-E2	Scope 2 emissions	See section F.5.3 Environmental Impact
C-E3	Energy consumption within the organization	See section F.5.3 Environmental Impact
Social		
C-S1	Female employees	See section F.4.1 Attract and Engage
C-S2	Female employees in management positions	See section F.4.2 Equality and Fairness
C-S3	Turnover rates	See section F.4.1 Attract and Engage
C-S4	Employee training	See section F.4.4 Training and Development
C-S5	Human rights policy	See section F.4.2 Equality and Fairness and Code of Conduct
C-S6	Collective bargaining agreements	See section F.4.2 Equality and Fairness
C-S7	Supplier assessment	See section F.5.2 Responsible Procurement
A-S1	Stakeholder engagement	See sections E.4 Risk Management and E.5 Stakeholder Engagement
A-S2	Employee training expenditure	See section F.4.4 Training and Development
A-S3	Gender pay gap	See section F.4.2 Equality and Fairness
SS-S8	Customer satisfaction	See section E.6 Customer Satisfaction
SS-S9	Customer grievance mechanism	See section E.6 Customer Satisfaction
Governance		
C-G1	Sustainability oversight	See section D.7 Corporate Responsibility Management
C-G2	Business ethics policy	See sections E.3.1 Compliance and E.3.3 Anti-Money Laundering
C-G3	Data security policy	See section F.2.2 Draw Credibility and Data Security
A-G1	Business model	See sections E.1 Business Model and E.2 How we Create Value
A-G2	Materiality	See section E.4 Risk Management
A-G3	ESG targets	See section G.2 Performance in 2019 and 2020 Targets
SS-G1	Business ethics violations	See sections E.3.1 Compliance and E.3.3 Anti-Money Laundering

G. APPENDIX

G.5 Independent Auditor's Report

(translated from the original in Greek)

To the Shareholders of ORGANIZATION OF FOOTBALL PROGNOSTICS S.A.

Report on the Audit of the Separate and consolidated Financial Statements

Our opinion

We have audited the accompanying separate and consolidated financial statements of ORGANIZATION OF FOOTBALL PROGNOSTICS S.A. (Company and Group) which comprise the consolidated statement of financial position as of 31 December 2019, the separate and consolidated statements of profit or loss and other comprehensive income, changes in equity and cash flow statements for the year then ended, and notes to the separate and consolidated financial statements, including a summary of significant accounting policies.

In our opinion, the consolidated financial statements present fairly, in all material respects the separate and consolidated financial position of the Company and the Group as at 31 December 2019, their separate and consolidated financial performance and their separate and consolidated cash flows for the year then ended in accordance with International Financial Reporting Standards, as adopted by the European Union and comply with the statutory requirements of Law 4548/2018.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs), as they have been transposed into Greek Law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the separate and consolidated financial statements section of our report.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Independence

During our audit we remained independent of the Company and the Group in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code) that has been transposed into Greek Law, and the ethical requirements of law 4449/2017 and of Regulation (EU) No 537/2014, that are relevant to the audit of the separate and consolidated financial statements in Greece. We have fulfilled our other ethical responsibilities in accordance with Law 4449/2017, Regulation (EU) No 537/2014 and the requirements of the IESBA Code.

We declare that the non-audit services that we have provided to the Company and its subsidiaries are in accordance with the aforementioned provisions of the applicable law and regulation and that we have not provided non-audit services that are prohibited under Article 5(1) of Regulation (EU) No 537/2014.

The non-audit services that we have provided to the Company and its subsidiaries, in the period from 1st of January 2019 to 31 December 2019, are disclosed in the note 45 to the separate and consolidated financial statements.

Key audit matters

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the separate and consolidated financial statements of the current period. These matters were addressed in the context of our audit of the separate and consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion of these matters.

KEY AUDIT MATTER

Revenue Recognition Based on Complex Information Systems – Gross Gaming Revenue
(Note 3.4. Revenue recognition, accounting for Payout to the winners and other Operating Income)
(separate and consolidated financial statements)

At 31 December 2019, Gross Gaming Revenue amounted to €1.61 bn for the Group and €1.36 bn for the Company.

The Group and the Company operate in a regulated environment and have a variety of revenue streams across its operations. The revenue streams involve a large volume of daily transactions being recorded, processed, computed, and accounted for using highly-complex interconnected IT systems (both in house and third-party ones), with a number of different and specialised bases for calculating revenue.

The accuracy and completeness of the amounts recognized from these revenue streams are highly reliant on Information Technology (IT) systems, and / or automated processes and controls (i.e. calculations, reconciliations) implemented in and / or using these systems.

The nature, complexity and the increased use of the aforementioned Information Technology (IT) systems combined with the large volume and complexity of transactions being processed on a daily basis increase the risk over the effective inter-connectivity of the IT systems and data, and the risk around the degree of reliability of the amounts recognized from these revenue streams.

The audit approach relies on the effectiveness of controls over IT systems, which is critical to the financial reporting, and the overall information security resilience of the Group and the Company.

HOW OUR AUDIT ADDRESSED THE KEY AUDIT MATTER

We assessed the information security resilience of the Group and the Company by evaluating the design and implementation of key IT processes and controls over financial reporting. More specifically, we assessed the overall IT environment including the administration of access, changes and daily IT operations for key layers of underlying infrastructure (i.e. application, operating system, database) for the systems in scope of the audit and tested the operating effectiveness of the aforementioned processes and controls. In addition, in order to place reliance on the system generated information (i.e. data and reports), and any IT dependent or automated controls (i.e. interfaces, calculations, reconciliations) implemented in these systems, we have also relied on business process controls, and performed analytical, and substantive procedures as part of our audit.

For the instances where, at a Company and Group level, the aforementioned systems and / or related processes and controls were outsourced to third parties, we obtained and evaluated the respective assurance reports, issued by the auditors of the Service Organizations, in order to obtain an understanding of the nature of the services being provided, and assess whether the third party services were operating as intended, and we evaluated relevant complementary controls in order to ensure the reliable revenue recognition.

Based on the audit procedures we performed, we did not identify any material discrepancies in the revenue recognised during the year.

KEY AUDIT MATTER

Impairment assessment of Intangible assets and Goodwill

(Note 2.2 Important accounting decisions, estimations and assumptions, 3.11 Impairment of non-financial assets, Note 6 Intangible assets and Note 10 Goodwill) (separate and consolidated financial statements)

At 31 December 2019, intangible assets amount to €1.06 bn for the Group and €0.93 bn for the Company and are presented at cost less accumulated depreciation and any impairment. Management tests annually, whether there are impairment indicators in non-financial assets. At 31 December 2019, Goodwill amounts to €30.2 mn and is measured at cost less any accumulated impairment losses. Goodwill is tested annually for impairment.

The financial and operating performance of certain Group's companies has indications that the carrying amount exceeds the recoverable amount and thus an impairment assessment has been performed for the concession right of the subsidiary Horse Races SA. For goodwill impairment test purposes, an assessment has been performed for the following three cash generating units ('CGUs'): Neurosoft SA, Cyprus Sports Ltd and Tora Direct SA.

Management determines the recoverable amount of each cash-generating unit as the greater of its value in use and its fair value less costs to sell.

The calculations for intangibles impairment tests use cash flow projections based on financial budgets approved by management covering a one-year period and cash projections for the remaining period of the use of the concession right.

The calculations for goodwill impairment tests use cash flow projections based on financial budgets approved by management covering a one-year period and cash projections for four additional years.

This is a key audit matter for our audit given that management, in determining the recoverable amount exercised judgement in calculating the future cash flows, (e.g. expectations on market development, and discount rates applied to future cash flow forecast).

Details on the assumptions used are included in *Note 6 "Intangible assets" and in Note 10 "Goodwill"*.

In the year ended 31 December 2019, an impairment charge of €4.0 mn was recognized with respect to the intangible assets of the subsidiary Horse Races SA. and an impairment charge of €4.0 mn was recognized to Goodwill with respect to Neurosoft SA.

HOW OUR AUDIT ADDRESSED THE KEY AUDIT MATTER

We evaluated management's overall impairment testing process, including process for identifying indicators for impairment, preparation of impairment testing models as well as their review and approval.

The key assumptions assessed per case included, the revenue growth rates, margin trends and discount rates.

We discussed extensively with management, the suitability of the impairment model and reasonableness of the assumptions and with the support of our valuation specialists we performed the following procedures:

- Benchmarking key assumptions in management's valuation models with market trends and assumptions made in the prior year.
- Testing the mathematical accuracy of the cash flow models and agreeing relevant data to approved business plans.
- Assessing the reliability of management's forecast through a review of actual performance against previous forecasts.
- Assessing the sensitivity of impairment tests to changes in significant assumptions

We validated the appropriateness of the related disclosures included in the Notes, in the financial statements. Based on our procedures, we consider management's key assumptions to be within a reasonable range.

KEY AUDIT MATTER

Impairment assessment of investments in subsidiaries (Note 2.2 Important accounting decisions estimations and assumptions and Note 11 Investment in subsidiaries) (separate financial statements)

At 31 December 2019, the Company has investments in subsidiaries of € 362.9 mn. These investments are accounted for at cost adjusted for any impairment occurred and are tested for impairment when indications exist that their carrying value may not be recoverable.

The financial and operating performance of certain Group's companies has indications that the carrying amount exceeds the recoverable amount and thus an impairment assessment has been performed for the subsidiary Horse Races SA.

The recoverable amount of the investments in subsidiaries is determined on value in use calculations, which requires the use of assumptions. The calculations use cash flow projections based on financial budgets approved by management covering a one-year period and cash projections for four additional years.

This is a key audit matter for our audit given that management, in determining the recoverable amount exercised judgement in calculating the future cash flows, (e.g. expectations on market development, and discount rates applied to future cash flow forecast.)

In the year ended 31 December 2019, an impairment charge of €8.3 mn was recognized with respect to the Company's investment in subsidiary Horse Races SA.

HOW OUR AUDIT ADDRESSED THE KEY AUDIT MATTER

We evaluated management's overall impairment testing process, including process for identifying indicators for impairment, preparation of impairment testing models as well as their review and approval.

The key assumptions assessed per case included the revenue growth rates, margin trends and discount rates.

We discussed extensively with management the suitability of the impairment model and reasonableness of the assumptions and with the support of our valuation specialists we performed the following procedures:

- Benchmarking key assumptions in management's valuation model with market trends and assumptions made in the prior year.
- Testing the mathematical accuracy of the cash flow models and agreeing relevant data to approved business plans.
- Assessing the reliability of management's forecast through a review of actual performance against previous forecasts.
- Assessing the sensitivity of impairment tests to changes in significant assumptions

We validated the appropriateness of the related disclosures included in the Notes, in the financial statements.

Based on our procedures, we consider management's key assumptions to be within a reasonable range.

KEY AUDIT MATTER*Impact of COVID-19*

(Note 2 Basis of Preparation, Note 47. Subsequent events)

The Company and the Group prepares its financial statements using the going concern basis of accounting. We focused on the appropriateness of the going concern basis of accounting given the potential impact that the recent outbreak of COVID-19 will have on the Company's and Group's operations and financial position. The ability of the Group to continue operating as a going concern is dependent on Management's ability to maintain liquidity in order to meet its current financing and operating obligations.

Management has also considered the impact of COVID-19 on the Company's and Group's future operating results and specifically the cashflows. The outbreak of COVID-19 and the related restrictions that were adopted by Government has resulted in the suspension of the Company's and Group's gaming store operations which negatively impacts future cash inflows.

Management performed sensitivity analysis over their cash flow forecasts to factor in the impact of an extended suspension of gaming operations stemming from COVID-19 and also considered the impact on the local and global economy.

Management's assessment of the going concern basis of accounting is based on cash flow projections which are dependent on significant management judgement and can be influenced by management bias.

HOW OUR AUDIT ADDRESSED THE KEY AUDIT MATTER

In assessing the appropriateness of the going concern basis of accounting used in preparing the financial statements, we:

- Obtained Management's assessment of the impact of COVID-19 on its future cashflows, including their analysis of future liquidity requirements. We discussed with Management the key assumptions made and assessed their plans to mitigate potential liquidity shortfalls.
- Obtained evidence over Management's underlying cash flow projections by evaluating these against relevant external and internal sources as deemed necessary. We compared revenues and cost assumptions against historical information including assessing the probability of achieving assumed cost reductions.
- Checked the mathematical accuracy of Management's cash flow forecasts.
- Performed independent sensitivity analysis to assess the impact of changes in the key assumptions underlying the cash flow forecast such as a further suspension of operations beyond Management's assessment.
- We evaluated Management's conclusion that there are no material uncertainties with respect to going concern.
- Reviewed the adequacy and appropriateness of Management's going concern and other relevant disclosures in the financial statements.

Following the performance of the above procedures, including the assessment of Management's underlying assumptions used in their assessment, and due to the Company's and Group's significant cash reserves, we satisfied ourselves that, even though the impact of COVID-19 on the Company and the Group is expected to negatively impact the Group's operating results and cash flows, Management's use of the going concern basis of accounting is appropriate.

Other Information

The members of the Board of Directors are responsible for the Other Information. The Other Information, which is included in the Annual Report in accordance with Law 3556/2007, is the Representation of the Members of the Board of Directors, the Board of Directors Report, (but does not include the annual financial statements and our auditor's report thereon), which we obtained prior to the date of this auditor's report.

Our opinion on the separate and consolidated financial statements does not cover the Other Information and except to the extent otherwise explicitly stated in this section of our Report, we do not express an audit opinion or other form of assurance thereon.

In connection with our audit of the separate and consolidated financial statements, our responsibility is to read the Other Information identified above and, in doing so, consider whether the Other Information is materially inconsistent with the separate and consolidated financial statements of our knowledge obtained in the audit, or otherwise appears to be materially misstated.

We considered whether the Board of Directors Report includes the disclosures required by Law 4548/2018 and the Corporate Governance Statement required by article 152 of Law 4548/2018 has been prepared.

Based on the work undertaken in the course of our audit, in our opinion:

- The information given in the Board of Directors' Report for the year ended at 31 December 2019 is consistent with the separate and consolidated financial statements,
- The Board of Directors' Report has been prepared in accordance with the legal requirements of articles 150, 151, 153 and 154 of Law 4548/2018,
- The Corporate Governance Statement provides the information referred to items c and d of paragraph 1 of article 152 of Law 4548/2018.

In addition, in light of the knowledge and understanding of the Company and Group ORGANIZATION OF FOOTBALL PROGNOSTICS S.A. and their environment obtained in the course of the audit, we are required to report if we have identified material misstatements in the Board of Directors' Report and Other Information that we obtained prior to the date of this auditor's report. We have nothing to report in this respect.

Responsibilities of Board of Directors and those charged with governance for the separate and consolidated financial statements

The Board of Directors is responsible for the preparation and fair presentation of the separate and consolidated financial statements in accordance with International Financial Reporting Standards, as adopted by the European Union and comply with the requirements of Law 4548/2018, and for such internal control as the Board of Directors determines is necessary to enable the preparation of separate and consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the separate and consolidated financial statements, the Board of Directors is responsible for assessing the Company's and Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless Board of Directors either intends to liquidate the Company and Group or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Company's and Group's financial reporting process.

Auditor's responsibilities for the audit of the separate and consolidated financial statements

Our objectives are to obtain reasonable assurance about whether the separate and consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these separate consolidated financial statements.

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the separate and consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's and Group's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Board of Directors.
- Conclude the appropriateness of Board of Directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's and Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the separate and consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company and Group to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the separate and consolidated financial statements, including the disclosures, and whether the separate and consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the consolidated financial statements. We are responsible for the direction, supervision and performance of the Company and Group audit. We remain solely responsible for our audit opinion.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the separate and consolidated financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report.

Report on other legal and regulatory requirements

1. Additional Report to the Audit Committee

Our opinion on the accompanying separate and consolidated financial statements is consistent with our Additional Report to the Audit Committee of the Company.

2. Appointment

We were first appointed as auditors of the Company by the decision of the annual general meeting of shareholders on 22/05/2019.

PricewaterhouseCoopers S.A.
Certified Auditors-Accountants
268, Kifissias Avenue
152 32 Halandri
SOEL Reg.113

Athens, 1 April 2020
The Certified Auditor Accountant

Konstantinos Michalatos
SOEL Reg.No 17701

G. APPENDIX

G.6 Abbreviations

Term	Refers to
AFT	Anti-Fraud Team
AML	Anti-Money Laundering
B2B	Business-to-Business
BoD	Board of Directors
CEO	Chief Executive Officer
CRM	Customer Relationship Management
CTF	Counter Terrorism Financing
EBITDA	Earnings Before Interest, Taxes Depreciations and Amortization
EL	European Lotteries
ESG	Environmental, Social and Governance
FOT	Field Operations Team
GDP	Gross Domestic Product
GDPR	General Data Protection Regulation
GGR	Gross Gaming Revenue: wagers minus prize payouts to winners
GHG	Greenhouse Gas Emissions
GLMS	Global Lottery Monitoring System
GRI	Global Reporting Initiative
H2GC	H2 Gambling Capital – independent providers of gambling market data and estimates
HGC	Hellenic Gaming Commission
IFRS	International Financial Reporting Standards
IGO	Illegal Gambling Office
IMS	Integrated Management System
KETHEA	Therapy Center for Dependent Individuals
KPI	Key Performance Indicator
NGR	Net Gaming Revenue
REX	Retail Excellence Program
SLA	Service Level Agreement
SME	Small and Medium Enterprises
SOC	Security Operations Center
SSBT	Self Service Betting Terminals
UNFCCC	United Nations Framework Convention on Climate Change
VLT	Video Lottery Terminals
WLA	World Lottery Association

