

Policy on Granting Winnings Certificates of OPAP Group

1. Purpose and Scope

OPAP Group, in alignment with decision no. 554/5/15.04.2021 of the Hellenic Gaming Commission (HGC), as amended and applicable, shall grant, for tax use, following the request of any beneficiary and holder of a Greek TIN, a Winnings Certificate for the right previous fiscal year (fiscal year “N-1”), for the entirety of the eligible winnings (set out per case below, in Chapters A and B) that derived from the gaming Activity of the applicant during such period (of fiscal year N-1), in companies OPAP S.A., HELLENIC LOTTERIES S.A. And HORSE RACES SINGLE MEMBER S.A.

The relevant requests for the granting of a Winnings Certificate on behalf of the beneficiaries shall be submitted exclusively remotely (through the Internet), once a year (fiscal year of request submission or fiscal year “N”). In particular, the said requests shall be submitted through website <https://winningscertificates.opap.gr/>, until the 31st of October of each year. The deadline for the online request submission may be extended upon Company’s decision, which shall be communicated through its website, www.opap.gr. In no case shall the Company issue a Certificate for winnings paid prior to the fiscal year exactly preceding the one of the request submission (e.g. Certificate for winnings of N-2 fiscal year).

2. Definitions and Abbreviations

| | |
|------------|----------------------------|
| HGC | Hellenic Gaming Commission |
| TIN | Tax Identification Number |
| VLT | Video Lottery Terminal. |
| Tax Office | Public Taxation Office |

3. Winnings Certificate of Games of Chance conducted Online or through an Individual Player Card (Named Participation Games)

As regards games conducted online or through an Individual Player Card (for participation in games through VLT-type gaming machines), a Winnings Certificate before taxes shall be granted for the entirety of the net winnings that occurred, based on his/her total Gaming Activity during the right previous fiscal year (N-1). Therefore, a condition for the eligibility of the said winnings for the granting of a Winnings Certificate shall be the positive result after the deduction of the total betting cost from the total gross winnings.

In any case, a relevant Winnings Certificate shall be granted only if the applicant, when submitting the winning participation, was over the minimum age of 21 years (unless otherwise specified in the Regulatory Framework governing the games of OPAP S.A.). For winnings deriving from entries

submitted by the interested person while not meeting the requirement above, no Winnings Certificate shall be issued.

Moreover, in case of winnings from games conducted through VLT-type gaming machines, the interested person shall have declared his/her TIN to stores of the relevant network or to the call center of OPAP S.A. prior to the submission of his/her request.

4. Winnings Certificate of Land-based Games of Chance (Anonymous Participation Games)

As regards games conducted through the land-based network and in which participation is mainly anonymous (thus, with the exception of games that require the existence of an Individual Player Card), a Winnings Certificate shall be issued for the entirety of the winnings that derive from tickets of gross winnings of at least one thousand (1,000) EUR each, which have been submitted during the right previous fiscal year (N-1), under the condition that the repayment of the respective tickets has been conducted by issuance of a relevant payment order to a bank and the Player has filed the said order to one of the cooperating Credit Institutions. Therefore, a condition for the eligibility of the said winnings for the granting of a Winnings Certificate shall be their repayment through the cooperating Credit Institutions.

Upon every online request for the granting of a Winnings Certificate, based on the declared Player's TIN, the entirety of payments of winnings conducted exclusively through Payment Service Providers during the right previous fiscal year is automatically retrieved, as such payments are included in the held record of winnings payments of the Group's Companies. In case payments are detected that concern winnings having been paid by all three Companies of the Group, three requests (one for each Company) shall be systemically created and three different Winnings Certificates shall be issued, namely one for OPAP S.A., one for HELLENIC LOTTERIES S.A., and one for HORSE RACES SINGLE-MEMBER S.A., with the entirety of the individual payments concerning each Company.

In any case, as regards land-based games, a relevant Winnings Certificate shall be granted only if the applicant, when submitting the winning participation, was over the minimum age of 18 years (unless otherwise specified in the Regulatory Framework governing the games of OPAP S.A.). For winnings deriving from entries submitted by the interested person while not meeting the requirement above, no Winnings Certificate shall be issued.

Moreover, as regards the granting of a Certificate of Winnings that derived from games not supporting group participation at the moment of payment of the respective consideration (e.g. STOIXIMA, KINO, SCRATCH, Ethniko/ Laiko Lottery), but allowing the proportional division of potential winnings later on, provided that a relevant Solemn Declaration of Co-beneficiaries (according to the specific provisions in the relevant winnings payment process <https://corporate.opap.gr/en/winnings-payment-circular>) has been timely submitted, the Winnings Certificate may be granted to each one of the co-beneficiaries exclusively under the condition that the above process of division of the relevant winnings has been abided and that each one of the co-beneficiaries has submitted a request, within its framework, according to the specific provisions of the present by using the below corporate website: <https://winningscertificates.opap.gr/>.

Only the electronic version of this document is considered to be valid and updated.

5. Certificate of Winnings Deriving from A Mixed (Anonymous and Registered) Participation in Games

Provided that, as regards a specific applicant, there are winnings deriving from both games conducted through the land-based network of OPAP agencies (having been collected exclusively through Payment Service Providers), and from games conducted online or through an Individual Player Card, a single Winnings Certificate shall be issued in the name of the applicant, which shall separately include the amounts per case that derived from each participation category.

6. Winnings Certificate - Individual Features and Conditions for Granting

As it has already been mentioned, the winnings certificate shall be granted, exclusively, to Players having a Greek TIN, and shall at least mention the following:

- a. The details and the number of the Player's ID card or passport.
- b. His/her Tax Identification Number.
- c. In separate parts:
 - aa. The total amount spent by the Player for his/her Participation in the Games.
 - bb. The total amount of gross attributed winnings during the reference period.
 - cc. The total amount of withheld tax on the winnings, in accordance with the applicable provisions.
 - dd. The total amount of net winnings attributed during the reference period.

The Group shall bear no responsibility as regards the correct presentation of the above details on the tax statement of each Certificate's beneficiary.

For the granting of the Winnings Certificate, the following are mandatorily required:



1. The creation of an individual electronic account on website <https://winningscertificates.opap.gr>, through which the applicant may submit his/ her request. Upon submission of the request, all personal details of the applicant shall mandatorily be declared, as well as the details of the procedural representative (e.g. lawyer, accountant or any other person), provided that such person has been appointed (full name, profession, phone number, e-mail and TIN).
2. The certification and verification of the individual details of the applicant Player. In particular, the electronic registration and attachment of all necessary pieces of information and supporting documents are required for this purpose, in accordance with Annex II of HGC decision, and more specifically: a) The latest tax return document of the applicant, and b) a Solemn Declaration (article 8 of L. 1599/1986) including: the Player's personal details, e-mail, exercised profession, as such are declared by the Player upon creation of his/her Individual Player Account, the details of the procedural representative, the exact text as

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indicated by the provided instructions in the page of Player's profile, in the relevant platform. The Solemn Declaration shall have been issued through gov.gr, or the signature of the Player in the Solemn Declaration shall have been authenticated by a competent authority. In the second case, a copy of both sides of his/her ID card shall be also attached to the same file of the Solemn Declaration. OPAP Group reserves the right to ask, at any time, at its discretion, for additional details and documents from the eventual applicant to safeguard the provisions of the regulatory framework on anti-money-laundering.

3. In the case of co-beneficiaries, a separate online Winnings Certificate request shall be submitted by each co-beneficiary through website: <https://winningscertificates.opap.gr>.
4. In the event that there is a discrepancy between the details in the "Bank Payment Request", in which case the winnings are credited to the beneficiary's IBAN, the Player may submit an online request for the issuance of a Winnings Certificate through website: <https://winningscertificates.opap.gr>.
5. The verification process of a Player's identity shall be repeated whenever there are doubts regarding the accuracy and completeness of the data provided.
6. If the details filled in the online request are proven to be false or inaccurate upon checking, or if it derives from the analysis of payments that the due processes regarding the entries, the games and the payments of the corresponding amounts were not met, the Winnings Certificate shall not be granted.
7. Concerning every online request for a Winnings Certificate that is approved by OPAP S.A., an update shall be sent to the declared e-mail of the applicant (and of the procedural representative, if appointed), who shall then log in the platform to complete the process of Certificate receipt. The online file shall be kept in the applications' history of the Player for any future use, for a period not exceeding two (2) years. Beyond that period, the Player shall not be able to find and print the file of the complete Certificate out of his/her applications history in the platform.
8. OPAP Group, also according to the provisions of the relevant HGC regulatory framework, shall reserve the absolute right to reject a Winnings Certificate granting request in case the conditions of Player's identity certification and verification have not been met, as well as in case it knows or has serious indications or suspects that the Player aims, through his/her Gaming Activity, at money laundering or financing of terrorism. The applicant shall be informed of the rejection of his/her request through an automated e-mail to be directly sent by the platform.

7. Records

| s/n | Record Title | Record Type   | | Retention Time | Responsible |
|-----|---|--|--|----------------|-------------|
| 1 | Requests and Winnings Certificates (platform winningscertificates.opap.gr) | ✓ | | 2 years | AML Team |

Annex 1: (554/5/15.04.2021)

Certification and verification of Player's identity upon issuance of the Winnings Certificate

The minimum information required for the certification of the identity of the Players at the time of issuance of Winnings Certificates, as well as the required documents for the verification of the aforementioned information, are, indicatively, the following:

| DATA FOR THE CERTIFICATION OF THE PLAYER'S IDENTITY | INDICATIVE DOCUMENTATION FOR THE VERIFICATION OF THE PLAYER'S IDENTITY (INDIVIDUALLY OR JOINTLY, AS APPROPRIATE) |
|---|---|
| Full name and father's name | ID card or valid Passport Identity of persons serving in the Police and in the Army (Military Identity Card) |
| ID or Passport number and issuing authority | |
| Date and place of birth | |
| Current home address Contact phone number | Recent phone, power, water supply bill Lease Agreement submitted to the tax authorities (Tax Office) Tax return document or other documents issued by the tax authorities (Tax Office) License of permanent residence in Greece, in force |
| Profession | Employer's certification Tax return document or other documents issued by the tax authorities (Tax Office) Copy of recent salary bill Professional identity/ General Commercial Registry (GEMI) Certificate Insurance body document |
| Tax Identification Number (TIN) Social Security Number | Tax return document or other documents issued by the tax authorities (Tax Office) |

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