



# CODE OF CONDUCT

APPROVED BY VIRTUE OF BOD DECISION

DAMIAN COPE  
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# OPAP CODE OF CONDUCT

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## Message from the Chief Executive Officer

Dear colleagues,

For the last 60 years, OPAP has been the leading gaming company in Greece and one of the most recognized in the gaming industry worldwide. Our long-standing commitment is to deliver meaningful contributions, both for the Company and the society, in which we operate, by steadfastly maintaining our ethics and integrity.

In this context, I am pleased to present the revised OPAP Group Code of Conduct, which continues to be a declaration of the highest possible standards of ethical business conduct, guiding our daily decisions and actions, and uniting all of us at OPAP under our Core Values.

The Code outlines our behaviors, explains our commitments and expectations towards our stakeholders, and provides guidance to all OPAP People, including our Board of Directors, Chief Officers, and all other employees, to meet their obligations, show respect to one another in the workplace and act with integrity towards our customers and partners.

Therefore, I encourage you to carefully read our Code and refer to it often for guidance. The Executive Committee (ExCo) and I are confident that all of us will embrace and act in line with OPAP's Code. Working together under this framework we will be able to continue to drive sustainable growth for society, and create value for our people, our customers, and our shareholders in the future.

**Thank you,**  
**Damian Cope**  
**Chief Executive Officer of OPAP**

## 1. INTRODUCING THE OPAP GROUP CODE

### 1.1 PURPOSE AND SCOPE OF THE CODE

The OPAP Group Code of Conduct (hereinafter the “Code”) outlines our principles and provides guidance to all our People (hereinafter Stakeholders) of what is expected of their behavior and business conduct.

This Code of Conduct is for everyone working for and with OPAP Group, including our subsidiaries OPAP Services S.A., Hellenic Lotteries S.A., Horse Races S.A., Neurosoft S.A, OPAP Cyprus Limited and OPAP Sports Limited, but may in the future be extended to other companies acquired or controlled by OPAP S.A.

Its purpose is to reinforce OPAP Group’s strong dedication to the highest standards of business conduct.

The Code acts as a general guideline to behavior, where no other specific standards apply. Many policies are referred in the Code. Any failure to comply with the standards contained in this Code may result in actions, civil and criminal liability. The Company may address a written notice to a Stakeholder who fails to comply with this Code or may take any disciplinary action it finds appropriate, including termination of service, taking into account the severity of the breach of the Code of Conduct.

### 1.2 DEFINITIONS

<b>STAKEHOLDERS</b>	All OPAP Group employees, Members of Board of Directors and external partners providing services to OPAP Group under contract.
<b>KEY MANAGEMENT PERSONNEL</b>	Persons having authority and responsibility for planning, directing and controlling the activities of the entity, directly or indirectly as provided in IAS 24.
<b>TRADERS</b>	Employees involved in the trading of a range of major sports areas, being responsible to change the Odds when there is Gap with market price.
<b>DATA CHAMPIONS</b>	Employees who act as the liaison between the Data Protection Officer and their teams to support on-going monitoring of the company’s compliance with applicable data protection laws and regulations.

### 1.3 USING THE CODE

The Code provides guidance on issues that may arise during service at OPAP Group and indicates whom to contact if someone thinks that himself/herself, or another Stakeholder, may have breached these rules.

Since no code of conduct can address all specific cases, all Stakeholders are responsible to adhere to the principles set out in this Code in a responsible way and with the exercise of good business judgment. If there are particular questions arising under this Code or uncertainty of how to act, communication with the immediate manager is often the best course of action, or alternatively contacting the Chief People Officer (see 'Raising concerns related with Human Resources policies and processes within the Organization' section 1.6 below) or the Regulatory & Compliance Officer (see "Whistleblowing Complaints Policy" section 6 below).

## 1.4 EXPRESSING OUR VALUES

The reputation of the OPAP Group brand as an organization acting with integrity, is vital for sustaining trust in its operations. OPAP Group must also safeguard the good reputation of all subsidiaries companies included in the Group. Operating with the values and principles of this Code is of fundamental importance and is a responsibility of each and every one of us.

As part of achieving our Company's 2020 Vision and shaping the right culture, our 4 Core Values, Fun, Dynamism, Passion and Fairness, were defined by our employees from all over the OPAP Group.

### **FUN**

**Fun is at the heart of everything we do!**

**Every day, we create together opportunities to play, to win, to reward, to celebrate and to offer a unique entertaining experience to our customers. Our way of working combines enjoyment and performance across our business while we encourage work and life balance.**

### **DYNAMIC**

**Evolution, Game changer!**

**We are a modern organisation, leading the game, committed to excellence across the board, continuously re-inventing ourselves and driving forward the gaming entertainment industry. As pioneers, we always seek inspiring, innovative, flexible solutions to offer world-class experience to our customers.**

### **PASSIONATE**

**We are passionate in everything we do.**

**We act as one team towards a common purpose, produce high value for our stakeholders. We are customer-focused with a bold and determined attitude delivering the ultimate gaming experience and inspiring each other to achieve the best of ourselves.**

## FAIR

### Fairplay!

**Everyone matters and is treated equally. We operate with respect and integrity in a responsible and inclusive manner, cultivating an open and transparent environment, always safeguarding that we are a leading and trusted group of companies.**

#### 1.5 WHAT IS EXPECTED OF OUR PEOPLE?

- Always comply with the law, regulations and license obligations that apply to OPAP Group's business activities.
- Carry out daily activities in compliance with this Code of Conduct.
- Act with honesty, integrity in our dealings internally and externally.
- Pursue best interest of OPAP Group.
- Respect Individuals and their human rights and never discriminate against anyone.
- Pursue equality of opportunity and inclusion for all employees through our policies and practices.
- Respect Diversity.
- If anyone thinks that these have been breached, there is an opportunity to raise concerns or complain (see 'Raising concerns related with Human Resources policies and processes within the Organization section below) or blow the whistle (see "Whistleblowing Complaints Policy" below).
- Read and acknowledge this Code by accepting it electronically or signing the Statement of Compliance and by returning it to the Total Rewards & Employee Relations Team. Total Rewards & Employee Relations Team will include the Statements in the individual employees' files. Stakeholders who have already acknowledged previous versions of the Code are obliged to familiarize themselves and acknowledge the provisions of any subsequent versions.

In case a person exercises managerial responsibilities he/she should also:

- Ensure that his/her team knows about the Code of Conduct and how it affects them.
- All Stakeholders have acknowledged the Code of Conduct in written or electronically. In case of written acceptance, they must return the attached Statement of Compliance to the Total Rewards & Employee Relations Team, who informs Regulatory & Compliance Officer via consolidated report.
- Act responsibly and professionally if his/her direct reports bring to his/her attention any allegations that the Code has been breached.

## 1.6 RAISING CONCERNS RELATED WITH HUMAN RESOURCES POLICIES AND PROCESSES WITHIN THE ORGANIZATION

The Code seeks to set out how the professional conduct of Stakeholders should be within the Organization. If you think there is a misconduct and you want to raise a concern or a complaint related with human resources policies and processes, you are encouraged, in the first instance to contact your immediate manager.

If a concern is submitted through a reporting line manager, the reporting line manager will attempt to resolve it. In case the line manager considers that he may not resolve the concern, he/ she will report it to the Total Rewards & Employee Relations Director or the Chief People Officer. If it is an 'Ask HR' question (without any specific incident being reported), the employee is advised by the line manager or the Total Rewards & Employee Relations Director or the Chief People Officer on - who to address to- so as to resolve the question.

When an official concern/complaint is received by the Rewards and Employee Relations Director or the Chief People Officer, they shall: Acknowledge receipt and as soon as possible, assign responsibility to review or investigate, in case further investigation is necessary. This may involve contribution from other Teams depending on the case, take feedback from Stakeholders involved, take appropriate action as required and report outcome back to the person who filed the complaint. Should there be solid ground for complaint, the Rewards and Employee Relations Director or Chief People Officer will update the electronic registry with the final outcome of the complaint.

OPAP will not tolerate retaliation against an employee for raising a complaint in good faith. Accordingly, OPAP Group will make best effort to protect the confidentiality of Stakeholders who do raise concerns or complaints. On the other hand OPAP will not tolerate misguiding complaints which are not addressed in good faith which will have consequences.



## 2. OPERATIONAL FRAMEWORK



### 2.1 LEGAL AND REGULATORY COMPLIANCE

OPAP Group is committed to strict compliance with all laws that apply to its business activities. Moreover, every Stakeholder has a personal responsibility to maintain the highest level of integrity, security and regulatory compliance in their day to day activities.

### 2.2 ADVERTISING, SALES PROMOTIONS AND CORPORATE COMMUNICATION

All OPAP Group advertising and other public communications will be legal, decent and truthful, will comply with the relevant regulatory framework and respect the rules of responsible gaming.

All sales promotion activity must be fair, tasteful and decent and must not result in any reputational risk for OPAP Group. All sales activity must respect the privacy of our customers and comply with the relevant Group Policies.

Company's Stakeholders may receive inquiries from the public or the media. The Stakeholder should only ask the name of the person making the inquiry and the organization for which he or she works and should be politely referred to the competent Chief Officer, to the office of the Chairman of the BoD, to the CEO's office or to the Chief Corporate & Regulatory Affairs Officer who is OPAP Group's assigned spokesman.

### 3. PERSONAL AND BUSINESS INTEGRITY



#### 3.1 CONFLICTS OF INTEREST

##### 3.1.1 CONFLICTS OF INTEREST

All Stakeholders have a duty of loyalty to the Company. Conflict of Interest may arise when Stakeholders are pursuing personal interests that conflict, or may conflict to the Company's interests. The objective is a consistent process for avoiding and managing potential conflict of interest. This includes for all Stakeholders to declare and register potential conflicts.

All Stakeholders are required to:

- Avoid any situation that could result in a direct or indirect interest that conflicts with the interests of OPAP Group.
- Mitigate and record action taken – If an unavoidable situation creates a potential conflict of interest, Stakeholders must agree how the potential conflict will be managed or resolved with their immediate manager, Regulatory & Compliance Officer and CEO, and register the information following the process described below.

Examples of actual and potential conflicts which must be avoided or immediately resolved:

1. If a Stakeholder knows that any member of his/her family (children, spouse, domestic partner, children of Stakeholder's spouse or domestic partner and dependants of Stakeholder or dependants of Stakeholder's spouse or domestic partner), should be, or become, involved with any competitor, supplier or other than player in circumstances which could lead to a potential conflict of interest with OPAP Group, then this fact must be drawn to the immediate manager's attention as soon as possible.
2. Stakeholders and their family members as defined above, should not hold investments in companies that are major suppliers, partners or agents of OPAP Group.
3. Stakeholders should not hold a directorship, an appointment, a main or ancillary employment in other enterprises, another significant source of annual income (exceeding 100.000 euros), a beneficial interest held in a family or business trust, other professional interests which constitute a potential conflict e.g. participation in professional bodies, unions, NGOs, Athletic Organizations etc.

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### 3.1.2 MANAGING POTENTIAL CONFLICTS

To promote transparency and protect all parties involved, Stakeholders are required to inform the Company and register any potential conflicts, including the measures that have been agreed to ensure the conflict does not materialize.

Stakeholders should disclose potential conflict of interest using the "Special Declaration" Form. Details of current suppliers can be obtained from the Procurement Division and the form mentioned above by the Regulatory & Compliance Officer.

Stakeholders should notify their immediate manager and the Regulatory & Compliance Officer of all actual or potential conflicts of interest, consulting the Code of Conduct. The Regulatory & Compliance Officer will maintain a register of such declarations and advise accordingly. Decision on how it will be managed is agreed between Stakeholder and the Regulatory & Compliance Officer, while the Regulatory & Compliance Officer updates the register accordingly and informs the Chairman and the CEO of the Company. The register is regularly monitored by the Compliance Office.

Stakeholders must immediately inform the Regulatory & Compliance Officer in regards with any change that affects the potential conflict of interest.

Stakeholders are expected to act for the benefit of OPAP Group and not to be influenced by any personal interest that may arise from other individual or business concerns. Stakeholders must abstain from any business activity where private interests would prevent them from taking an objective decision. Should the conflict of interest not be declared in the "Special Declaration Form" by the Key Management Personnel

and to the Regulatory & Compliance Officer by the relevant Stakeholders, it would automatically be considered as a violation of the Code of Conduct.

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### 3.1.3 SPECIAL REQUIREMENTS FOR THE MEMBERS OF THE BOD AND KEY MANAGEMENT PERSONNEL

In particular, members of the Board of Directors and any third party to whom their power is entrusted, have a duty of loyalty to the Company and are required to comply with the provisions of the Articles of Association of the Company and the relevant legislative framework as in force.

## 3.2 GIFTS AND DONATIONS

It is prohibited to offer, solicit or accept gifts, donations in cash or any other form and any benefit related to the performance of the Stakeholders duties.

It 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 immediate manager and the fact that a gift was offered or received must be reported to the Regulatory & Compliance Officer, who maintains a gifts and hospitality registry.

Any gift of value exceeding €150 may still be accepted or offered after obtaining pre-approval from the Chairman of the Board, the Chief Executive Officer and the Regulatory & Compliance Officer.

Gifts should be transparent, infrequent and should not be offered or accepted during contractual negotiations or a tender process 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.

Where there is any uncertainty if offers, invitations or acceptance of corporate gifts or hospitality from/to third parties should be refused, or returned to the third party, Stakeholders should contact the Regulatory & Compliance Officer.

## 3.3 COMPETITION LAW

OPAP Group wishes to create trust with customers and with its network through free and fair competition. OPAP Group does not seek competitive advantages through illegal or unethical business practices and it abides by all applicable competition laws in all countries where it operates.

Robust set of controls are in place so as to ensure that the risk of breaching competition law is eliminated. Such controls indicatively include risk assessments conducted before implementing business decisions,

action plans developed to mitigate potential risks, training is offered to Stakeholders and competition law specialists' support is sought before taking competitively sensitive business decisions.

Infringement of competition legislation may expose the OPAP Group companies to serious fines and reputational harm. Furthermore, a Stakeholder who is responsible for such violation may be subject to civil and criminal liability, in accordance with applicable laws as well as to termination of his/her service in the OPAP Group. Therefore, where there is any doubt regarding the lawfulness of any communication, contract, commercial practice or activity, all Stakeholders are encouraged to consult with the Regulatory & Compliance Officer before embarking on any activity which could potentially lead to a breach of competition law. In serious cases, Stakeholders are encouraged to escalate their concern to the Chairman of the BoD and/or the CEO.

### 3.4 SOCIAL MEDIA

Many OPAP Group Stakeholders have personal profiles on different social media and use these platforms for interaction with friends and family as well as promoting favorite brands.

It is important for all Stakeholders to exercise caution when making any reference to OPAP taking into consideration the relevant corporate policies.

Stakeholders must respect the privacy of their colleagues and of third parties and refrain from uploading personal data and photos of data subjects who have not provided prior explicit consent.

### 3.5 PROHIBITION OF PLAY

OPAP Group personnel shall not participate in games of chance provided through PLAY gaming machines and in the online (through the internet) game of chance of fixed odds betting and numeric games (once this option is activated).

Particularly OPAP S.A. traders shall also be restricted from participation in the fixed-odds betting games conducted through the retail network (land-based) in addition to the above restrictions which apply to all members of personnel.

Furthermore, any stakeholders, who due to their job tasks have access to confidential information concerning the betting games should not:

- Share confidential information with third parties, unless they act in the normal course of their business or within their objectives.
- Provide advice to any third party on the basis of inside information available to them or on the basis of the facts they know and/or control of their role.

OPAP Group has defined a special process for the creation of Test Accounts in the production environment for online betting. Should any Stakeholder wish to open an account that will allow execution of tests for

reasons pertaining to the Stakeholder's job tasks, a relevant request should be submitted to their immediate manager or the Regulatory & Compliance Officer who can advise on the approvals required and the procedures to be followed.

Any breach of these restrictions will be deemed misconduct and will be subject to the provisions of legislative/regulatory framework and this Code of Conduct. If in any doubt on the applicability of the prohibition to you, please contact the Regulatory & Compliance Officer.

### 3.6 MONEY LAUNDERING

Commercial transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, bribery and fraud. Anti-money laundering laws and applicable sector-specific regulation require transparency of payments and the identity of all parties to transactions exceeding the thresholds defined in the relevant framework.

OPAP Group takes all necessary measures to prevent money laundering activities in the area where it operates and within its sphere of influence.

For more information, please consult the OPAP Group Anti Money Laundering Policy, the Policy on Issuance of Winnings Certificates and any other relevant policy.

### 3.7 FRAUD, BRIBERY AND CORRUPTION

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. Stakeholders of OPAP Group must not offer, provide, accept, or promise, either directly or indirectly, any undue financial or other advantage to a public and/or private official for the purpose of obtaining any favorable treatment or business advantage. Stakeholders should immediately report any concerns of fraud, bribery and corruption in accordance to the "Whistleblowing Complaints Policy".

In addition, it is OPAP Group policy never to solicit, accept or give unauthorized information during the bidding process such as source selection criteria or competitive information. If in doubt, ask by conferring with the Regulatory & Compliance Officer.

A Stakeholder who commits bribery while on duty may be subject to civil and criminal liability, in accordance with applicable laws as well as to termination of his/her service with OPAP Group.

### 3.8 COOPERATING WITH GOVERNMENT INVESTIGATIONS

Doing business in a regulated environment, OPAP Group is committed to cooperating with appropriate state inquiries and investigations. All state or regulatory requests for information, documents or investigative interviews must be referred immediately to the Regulatory & Compliance Officer. In the event that an OPAP Group Stakeholder is called upon to provide oral information to a public investigator, he/she may choose to do so but is reminded to provide full and truthful information and notify accordingly the Regulatory & Compliance Officer upon receipt of the investigator's request/subpoena. In those instances where Company documents are requested, Stakeholders are reminded of the obligation to preserve such material but also that such material is OPAP Group property and as such, every Stakeholder must obtain permission to provide such material from the Regulatory & Compliance Officer.

Nothing in this Code should be interpreted as prohibiting or discouraging Stakeholders from testifying, participating or otherwise assisting in any state or administrative, judicial or legislative proceeding or investigation.

## 4. HOW WE PROTECT THE ASSETS AND THE CUSTOMERS OF OPAP GROUP

### 4.1 CONFIDENTIALITY

In OPAP Group we value and protect our information and we respect the information provided by third parties. "Confidential information" is all non-public information relating to the Company, including, but not limited to, information that could be useful to competitors or otherwise harmful to the Company's interests or objectives, if disclosed.



Details regarding the classification of information can be found in Asset Management Policy. Stakeholders will not during their service, or at any time thereafter, disclose or use for purposes other than their service, any confidential information which concerns the affairs of OPAP Group or any past, present, or prospective player, agents, supplier or Stakeholder. This applies also to Stakeholders' personal data, as well as to documents and information entrusted to the OPAP Group by third parties.

Confidential information may be disclosed under OPAP Group's policies or as required by law or court order. In all such cases, Stakeholders must inform the person responsible for the confidential information and/or the Regulatory & Compliance Officer in order to be authorized for any disclosure. All third parties who receive such information will be required to sign a confidentiality agreement. All Stakeholders who use IT systems shall pay particular attention to IT aspects of confidentiality, such as data protection and data security.



## 4.2 INSIDER TRADING

Stakeholders who have access to inside information that may influence the price of the shares or other financial instruments of any listed company of the OPAP Group must keep such information confidential.



Accordingly, they are obliged to refrain from carrying out any transaction in such shares, whether for their own account or for the account of a third person, taking advantage of inside information. In general, they must fully comply with applicable insider trading laws. For this reason, all such Stakeholders are required to be aware of and comply with the applicable laws and regulations and the relevant provisions of the Internal Rules and Regulations of OPAP S.A., which are accessible by all Stakeholders through the opap.gr site.

If you have any question about these issues, please address to the Regulatory & Compliance Officer or the Investor Relations Team.

## 4.3 INTELLECTUAL PROPERTY

All Copyrights (e.g. copyrights to any IP element such as software, source codes, websites, databases, records, documents, designs, papers, including copies and summaries of them etc), as well as Industrial Property rights (such as trademarks, patents, industrial designs, utility models domain names etc.) and any other intellectual property and related rights



('Works') made or acquired by Stakeholders in the course of their service, shall, together with all the worldwide rights, titles, interest in all the Works, be, and at all times remain, the absolute property of OPAP Group.

Stakeholders should promptly disclose to the Regulatory and Compliance Officer any invention, discovery, improvement or design made by them and relating to equipment of a type made, supplied, designed, or in development by OPAP Group or relating to the manufacture of such equipment or otherwise suitable for the purpose of the business of OPAP Group.

Stakeholders agree that all inventions, copyright, design and similar rights in all work done in the course of their service shall belong exclusively to OPAP Group.



#### 4.4 OPAP GROUP ASSETS

Stakeholders are responsible for safeguarding and making proper and efficient use of OPAP Group's assets. Assets include both tangible (premises, equipment, computer hardware, furniture etc.) and intangible (goodwill, patents, trademarks, intellectual property, information etc.) assets, as well as cash and other financial facilities.



Each Stakeholder has an obligation to prevent OPAP Group's assets from loss, damage, misuse, theft, embezzlement or destruction. Any situations or incidents that could lead to theft, loss, misuse or damage of OPAP Group's assets should be reported immediately to Risk & Security Team and/or the competent Team or, in case of employees, to their immediate manager as they come to their attention.

#### 4.5. INFORMATION SECURITY AND BUSINESS CONTINUITY

Corporate Information (whether in electronic, printed or any other form) is a critical asset of OPAP Group. All corporate information must be given the highest level of protection commensurate with its value, in a way that protects the interests of all stakeholders, reinforces customer trust, ensures compliance with regulatory obligations and protects Group competitiveness and sustainability. Every stakeholder has a personal responsibility on protecting corporate Information in his/hers day to day work. OPAP Group shows a strong commitment towards the protection of Information assets and Business Continuity that is reflected upon its Information Security Management System (ISMS). Incidents regarding information security should be reported immediately (i.e. call 210-5798420 or 7555, or email at [it-helpdesk@opap.gr](mailto:it-helpdesk@opap.gr), [abuse@opap.gr](mailto:abuse@opap.gr)), following appropriate procedures. In case you need further clarifications, please contact Information Security Officer.

#### 4.6 PHYSICAL SECURITY

Stakeholders should always secure their PC, laptop, important equipment and personal belongings, even while in OPAP Group premises. They should always wear their OPAP Group ID card visibly while on site; look out for anyone who 'tailgates' through our doors, and challenge visitors who aren't showing an OPAP Group ID card. Any suspicious activity should be promptly reported to Risk and Security Team.



More details can be found in [Physical & Environmental Security Policy](#). In case you need further clarifications, please contact the Risk & Security Team.

#### 4.7 DATA PROTECTION (PERSONAL DATA, RECORDS AND REPORTS)

If you handle personal information about individuals, you have a number of legal obligations to help ensure that OPAP Group is protecting that information under the applicable Data Protection Legislation (DPL). The DPL applies to all personal information for which OPAP Group is responsible, including both electronic and manually recorded data.



By personal information, we mean any information relating to an identified or identifiable natural person ('data subject').

OPAP Group's policy is to comply with local laws and policies and with directly applicable provisions of the EU Data Protection Framework and particularly with the EU General Data Protection Regulation 2016/679. OPAP Group has issued and implemented a Data Protection Policy (P351). This Policy defines the key principles applied when processing personal data and presents the personal data governance structure, including the role of Data Champions. Each Team has appointed a Data Champion, who acts as a liaison between the Team and the Data Protection Office. The Data Protection Policy and all relevant policies and processes are available on Opapopen.

All activities involving processing of personal data are identified and registered in the Record of Processing Activities. Personal information about individuals that OPAP Group staff may retain, have access to, or learn in the course of their duties, must be processed according the law and applicable regulatory framework and solely for the purposes specified when designing the relevant processing activity, in accordance with internal policies and guidelines.

In addition, breach of the Data Protection Legislation by Stakeholders may be treated as a disciplinary offence and dealt with in accordance with OPAP's Labor Regulation. Further, a breach of DPL may lead OPAP Group to severe fines, amounting to a percentage of 4% of the total annual turnover. Any stakeholder who is in doubt about the applicable legal requirements or considers that the Data Protection Framework has not been adhered to, should raise the matter with the Data Protection Officer ([dpo@opap.gr](mailto:dpo@opap.gr)).

#### 4.8 PLAYER SERVICES

OPAP Group is committed to best practice in the development of services for players and winners of OPAP Group games. OPAP Group provides a range of services for disabled players and winners.



#### 4.9 PLAYER PROTECTION

OPAP Group puts special emphasis to looking after winners. One of the most important decisions for winners to make is whether to opt to go public or remain anonymous. If a winner decides to talk publicly about his/her win, OPAP Group's Corporate & Regulatory Affairs Team could organize a press conference and handle all media interest on his/her behalf, including the press releases.



OPAP Group takes its obligations and duty of care to protect winners' privacy very seriously. Unless a winner agrees to take publicity and signs an agreement to that effect, no information about him/ her can be released by OPAP Group into the public domain. The above do not restrict the right of OPAP Group to release information about the winning slip, such as the location, the amount won etc.

#### 4.10 PREVENTING EXCESSIVE AND UNDERAGE PLAY

OPAP Group has a strategic priority to prevent excessive play and prohibit under-age play according to the Responsible Game framework and Policies of the Company, as well as to monitor OPAP Group games. OPAP Group is committed in the promotion and adherence to the Responsible Gaming principles, as reflected in the Responsible Gaming Policies of OPAP Group companies.



The above Policies are addressed to all stakeholders engaged to OPAP Group activities and constitute a self-commitment that the Company takes all necessary measures, by providing all necessary information concerning games of chance, so as to minimize their potential negative impact. In this respect, the Company supports the Therapy Center for Dependent Individuals (KETHEA-ALFA) for the operation of the Helpline 1114, which provides psychological support and telecounseling to persons encountering problems from excessive participation in games of chance and their relatives and friends.

## 5. OUR PEOPLE



### 5.1 RESPECT FOR THE INDIVIDUAL

OPAP Group treats all its Stakeholders with respect while it is expected that its' Stakeholders shall fulfil their responsibilities. All policies are accessible via the intranet. In case you need clarifications, talk to your immediate manager or the Total Rewards & Employee Relations Director.

### 5.2 EQUAL OPPORTUNITIES

OPAP Group is firmly committed to providing equal opportunities to all its Stakeholders and will not tolerate any illegal discrimination or harassment of any kind.

OPAP Group recruits and promotes on the basis of suitability for a position without discrimination on grounds of ethnic origin, religion, nationality, gender, sexual orientation, marital status, age, or disability. OPAP Group's policy is to comply with applicable laws and policies with respect to discrimination.

If a Stakeholder believes that he/she has been discriminated he/she should raise their concern confidentially with their immediate manager in the first instance or the Chief People Officer in accordance with 'Raising concerns related with Human Resources policies and processes within the Organization'.

OPAP Group will respect his/her confidence, fully investigate the situation and take action as quickly as possible.

### 5.3 DIVERSITY

It is the responsibility of each of us to respect the diversity of individuals and cultures among our Stakeholders and within the communities in which we operate. We can only achieve a high level of Stakeholder involvement and teamwork by understanding and respecting the differences among our Stakeholders. We also recognize that the diversity within our communities and marketplaces should be reflected among our Stakeholders who serve those communities and marketplaces. We embrace diversity at all levels of OPAP Group and will maintain a work environment where all Stakeholders develop and contribute to their full potential in achieving our business goals. Avoiding discrimination on the basis of gender, age, race, religion, or national origin, and promoting equal opportunity to all qualified individuals is the responsibility of every Stakeholder. We must always be vigilant to avoid discrimination and promote equal opportunity in every decision.

## 6. WHISTLEBLOWING COMPLAINTS POLICY



### 6.1 WHISTLEBLOWING COMPLAINTS

The Company is committed to conduct 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, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

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. This Policy aims to:

- I. Encourage people to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and it will remain confidential.
- II. Provide people with guidance as to how to raise those concerns.
- III. Reassure people that they should be able to raise genuine concerns in good faith.

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work, hereafter called "Improper Activities". Improper Activities include, but are not limited to:

- a) questionable accounting, internal accounting controls or auditing matters, including the following:
  - fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
  - fraud or deliberate error in the recording and maintaining of financial records of the Company;
- b) public disclosures made by the Company that may not be complete or accurate;
- c) violations of the Company's Code of Conduct, and internal policies and procedures, except for HR related issues;
- d) violations of laws applicable to the Company;
- e) wire fraud, mail fraud, bank fraud, or any fraud against the Company's shareholders or under statute;
- f) forgery or alteration of documents;
- g) misappropriation or misuse of Company resources, such as funds or other assets;
- h) authorizing or receiving compensation for goods not received or services not performed; or

any other activity being a criminal activity, a danger to health and safety, a damage to the environment, a bribery, a negligence, a conduct likely to damage the Company's reputation, an unauthorized disclosure of confidential information; a misconduct by any supplier, the deliberate concealment of any of the above matters.

If the employee is uncertain whether something is within the scope of this Policy, it should seek advice from the Company Regulatory & Compliance Officer.

## 6.2 PROCESS IN CASE OF A WHISTLEBLOWING COMPLAINT. HOW SHOULD I BLOW THE WHISTLE?

### 6.2.1 WHO SHOULD I CONTACT IF I HAVE A WHISTLEBLOWING COMPLAINT TO REPORT?

All officers, directors and employees are required to report to the Regulatory & Compliance Officer all evidence of activity by a Company department or employee that may constitute Improper Activities providing as much specific information as possible including names, dates, places and events that took place and the employee's perception of why the incident(s) constitute an Improper Activity. These reports should be factual rather than speculative or conclusory and should contain specific information to allow for proper assessment of the nature, extent and urgency of the issues raised in the report. Such reports may



be submitted in a confidential and anonymous manner, are encouraged to be made in writing so as to assure a clear understanding of the issues, but may also be oral.

The Regulatory & Compliance Officer shall address the complaint to the Audit Committee, so as to conduct a thorough investigation. The Company will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of complaints regarding Improper Activities.

The Regulatory & Compliance Officer will be responsible for any other person that he may designate on matters arising under this Policy. The Regulatory & Compliance Officer's responsibilities under this Policy include:

- a) administering, implementing and overseeing ongoing compliance under the Whistleblowing Complaints Policy;
- b) administering procedures to assure that such reports of Improper Activities will be collected, reviewed promptly, treated or resolved in an appropriate manner, and retained;
- c) making himself available to discuss with employees any complaints raised or reports filed;
- d) administering procedures that enable employees to submit reports of Improper Activities and related concerns in a confidential and anonymous manner.

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## 6.2.2 INVESTIGATION PROCEDURE AND OUTCOME

Complaints received under this Policy will be reviewed under the oversight of the Audit Committee, by the Company's Regulatory & Compliance Officer, the Internal Audit Team, or such other persons as the Audit Committee or the Regulatory & Compliance Officer determine to be appropriate. All remedial actions required should be assessed in accordance with applicable legislation and Company's policies and procedures.

Once the employee has raised a concern, an initial assessment will be carried out to determine the scope of any investigation. The employee will be informed of the outcome of the assessment and may be required to attend additional meetings in order to provide further information.

In some cases the Audit Committee may appoint an investigator or team of investigators including people with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable the Company to minimize the risk of future Improper Activities.

The Company's aim will be to keep the employee informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the employee receiving specific

details of the investigation or any disciplinary action taken as a result. The employee should treat any information about the investigation as confidential.

The Audit Committee and the Regulatory & Compliance Officer should individually or jointly decide to escalate to the Chairman, and/or CEO, and/or the Board of Directors the outcome of the investigation procedure following the complaint so as for them to decide if further action needs to be taken according to article 1.1 of the present Code.

### 6.3 DOCUMENT RETENTION POLICY

The Regulatory & Compliance Officer will maintain a registry of all complaints, tracking their receipt, investigation and resolution and shall prepare a periodic summary report thereof for the Audit Committee, the Chairman of the BoD and the CEO. Copies of complaints and such journal will be maintained in accordance with the Company's document retention policy.

### 6.4 METHODS FOR MAKING A WHISTLEBLOWING COMPLAINT

Any person who wants to 'blow the whistle' can do so in one of the following ways:

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

Complaints can also be sent anonymously. However, this should only be done in exceptional cases, since complaints under a name are clearly more credible and offer the opportunity to communicate directly with the person raising the complaint for clarifications and additional information while examining this complaint.

## 7. ENSURING STAKEHOLDERS' AWARENESS

It is important that Stakeholders understand what OPAP Group expects of their behavior and the way they conduct business. To ensure this, OPAP Group will:

- Ensure a copy of the Code, as applicable at any given time, is available to all Stakeholders through the Opapopen
- Ensure that all OPAP Group Stakeholders have formally acknowledged this Code
- Promote the Code to all Stakeholders
- Conduct educational training with Stakeholders in order to increase awareness of the Code



## STATEMENT OF COMPLIANCE

To the Regulatory & Compliance Officer of:

<input type="checkbox"/>	OPAP S.A. /OPAP Services S.A.
<input type="checkbox"/>	Hellenic Lotteries S.A.
<input type="checkbox"/>	Horse Races S.A.
<input type="checkbox"/>	Neurosoft
<input type="checkbox"/>	OPAP SPORTS
<input type="checkbox"/>	OPAP CYPRUS

I have read, understood and acknowledged the principles and provisions contained in the OPAP Group Code of Conduct. I understand that this Statement refers to the Code of Conduct as currently in force and as amended from time to time, provided such amendments have been communicated by OPAP Group. I will adhere to and comply with such principles and provisions.

Please sign here: .....

Date: .....

Name: .....

*Please return the signed and completed Statement to the Total Rewards & Employee Relations Team. Total Rewards & Employee Relations Team will gather all the statements, archiving them in the employees' personal records and provide the Regulatory & Compliance Team with the respective copies.*