

RESPONSIBLE GAMING POLICY of HELLENIC LOTTERIES S.A.

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1. Definitions

- “HELLENIC LOTTERIES S.A.” or “HELLENIC LOTTERIES” or the “Company” shall refer to company HELLENIC LOTTERIES S.A.

- The terms “HELLENIC LOTTERIES S.A. Points of Sale Network” or “Points of Sale Network” shall refer, in the framework of the present Policy, to:
 - a. the Wholesalers;
 - b. the Retailers;
 - c. OPAP S.A. Agents;
 - d. the Salesmen;
 - e. the Mini Markets;
 - f. the Kiosks;
 - g. Hellenic Post (ELTA) and any other point of sale, in which State Lotteries of HELLENIC LOTTERIES S.A. are provided.

- “State Lotteries” include:
 - a. Popular (Laiko) Lottery;
 - b. National (Ethniko) Lottery;
 - c. Special State Social Solidarity Lottery (Eidiko Kratiko Lacheio yper Koinonikis Antilipseos) or New Year's Eve (Protochroniatiko) Lottery;
 - d. Instant (Stigmiaio) State Lottery;
 - e. Housing (Stegastiko) Lottery;
 - f. European Lottery.

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

It shall be clarified that the information given by HELLENIC LOTTERIES S.A. does not constitute the provision of advice or incitement to consumers to participate in the games it conducts. In any case it is pointed out that the participation in games of HELLENIC LOTTERIES constitutes a personal choice of the consumer himself/herself, which is based on the need to satisfy one’s natural propensity to entertainment.

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2. Scope and content of the present

The present Policy on “Responsible Gaming” of HELLENIC LOTTERIES is addressed to all stakeholders engaged to its activities, and constitutes the self-commitment that the Company takes all necessary measures, by providing all necessary information concerning its games, so as to minimize their potential negative impact.

The Responsible Gaming Policy sets the general principles for the responsible conduct of games of chance provided by HELLENIC LOTTERIES S.A., under the scope of which players, HELLENIC LOTTERIES S.A. personnel, and the HELLENIC LOTTERIES S.A. Points of Sale Network fall.

It also defines the principles and the content of HELLENIC LOTTERIES S.A.’s commitment, as a member of OPAP Group companies, which aims at the elimination of the potential negative impact of games of chance to the society, as a whole. It is in accordance with and supplementary to the existing Greek, EU and international legislative and regulatory framework on games of chance, as well as to Responsible Gaming. Towards this direction, the principles for the operational framework of the games of chance are established in order to safeguard:

- The provision of timely and complete information to the player regarding one’s participation in games of HELLENIC LOTTERIES, in order for him/her to make decisions being fully aware of the rules of conduct of the games he/she selects to participate in. It is explicitly clarified that the participation in games of HELLENIC LOTTERIES is the result of free and independent personal choice of each player (unstimulated gambling).
- The provision of information regarding the existing bodies that assist and support players who encounter problems related to their excessive participation in games of HELLENIC LOTTERIES, as well as their families.
- The protection of minors through the prohibition of their participation in games provided by the Company.

3. Objective and strategy of HELLENIC LOTTERIES S.A. on Responsible Gaming

In 2018, HELLENIC LOTTERIES S.A. was awarded the Responsible Gaming Level 4 Certification by the **World Lotteries Association (WLA)**. The aforementioned body has certified, in the most official way, that HELLENIC LOTTERIES S.A. takes effective measures on Responsible Gaming, based on standards and specifications established by the said body.

HELLENIC LOTTERIES S.A.’s long-standing objective is to safeguard a responsibly developed environment for all those who wish, in the context of their entertainment, to participate in the games of chance provided by the Company.

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

In order to achieve the objective of Responsible Gaming, HELLENIC LOTTERIES S.A. has developed a strategy for Responsible Gaming, which is structured on **three main pillars**:

- Players.
- HELLENIC LOTTERIES S.A. Personnel.
- HELLENIC LOTTERIES S.A. Points of Sale Network: Agents, Managers of Agencies, Agencies' personnel in general, Retailers (street vendors, mini markets, kiosks) and Wholesale Partners (Wholesalers, Distributors).

In addition, HELLENIC LOTTERIES S.A. also implements a series of other actions to support its Responsible Gaming strategy, which include:

- The drafting of a specific HELLENIC LOTTERIES S.A. Personnel Policy on Responsible Gaming (Section 2.1 below).
- The drafting of a specific Policy on Responsible Gaming for the Partners and the personnel in general (Section 2.2 below).
- The integration of Responsible Gaming principles to all **advertising and commercial communication** activities and the drafting of a special **HELLENIC LOTTERIES S.A. Commercial Communication Policy on Responsible Gaming** (Section 2.3 below).
- The promotion of the active participation of all **stakeholders** in order to establish a continuous open dialogue and partnership in Responsible Gaming activities.
- The continuous monitoring of problematic playing behavior regarding HELLENIC LOTTERIES games.
- The integration of Responsible Gaming principles and features to **the designing of game of chance**.
- The **referral to support and treatment bodies** and the support of programs related to problematic participation in HELLENIC LOTTERIES games.
- The adoption of **reporting, measurement and certification mechanisms** to safeguard the implementation of Responsible Gaming principles.

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4. Responsible Gaming and Players

HELLENIC LOTTERIES S.A. commits to provide any necessary information relating to the games it conducts, so that the players can decide if and how they will play, by making their decision according to their personal choices and their personal background.

Players can find information on the games, the conduct rules and the winning chances in each one of them, as well as information about where they can refer to for help in case they encounter a problem related to excessive participation in HELLENIC LOTTERIES games.

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

- The provision of accurate and continuous information via:
 - the design and implementation of a Responsible Gaming awareness campaign through the Media, at the HELLENIC LOTTERIES S.A. Points of Sale Network;
 - the incorporation of messages on Responsible Gaming in all State Lottery tickets;
 - the incorporation of messages on Responsible Gaming in all State Lottery tickets and other means used for the conduct of HELLENIC LOTTERIES S.A. games of chance, and the provision by the Company of relevant informational material on Responsible Gaming principles and on the impact that the excessive participation in games of chance may have;
 - the placement of signage on Responsible Gaming at the points of sale;
 - the communication channel of HELLENIC LOTTERIES S.A. with partners of its Network, at which any necessary information is provided regarding the offered games of chance ;
 - the development of a corporate website (including a dedicated section on Responsible Gaming) <https://www.opapcsr.gr/h-desmeush-mas/>, providing information on Responsible Gaming principles and rules, the helpline/support program, the players' self-assessment questionnaire, and other Responsible Gaming issues.
- The adoption of measures to protect players' private life and the confidential nature of their personal data, including information related to their gaming activity.
- The provision to players of the option to submit complaints on Responsible Gaming through its Points of Sale Network, its call center, and/or through the channels posted on HELLENIC LOTTERIES S.A. website. The implementation of processes regarding the handling of complaints with regard to Responsible Gaming.
- The development and implementation of an effective referral mechanism to support and treatment bodies for players with problems related to their excessive participation in HELLENIC LOTTERIES games.

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4.1. Research

HELLENIC LOTTERIES S.A. aims at implementing a systematic approach for the conduct and recording of research on its customers' gaming behavior regarding Responsible Gaming, and for the integration of its results to its operation, in order to identify areas for further improvement in its games and processes.

In this context, HELLENIC LOTTERIES S.A. promotes the research on excessive participation in its games and on the protection of minors and of vulnerable social groups, in cooperation with independent research institutes and treatment providers. It monitors and analyzes relevant data, presents the results to involved parties and to the public, supports scientific conferences, and participates in programs that promote the understanding of problematic gaming, and in the design of interventions for the prevention and treatment of problems related to excessive participation in games of chance.

4.1.1. Game Design

HELLENIC LOTTERIES S.A. ensures the integration of Responsible Gaming principles to the games it designs and conducts.

In particular, the Company takes the following measures:

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

4.1.2. Referral to Treatment

As mentioned above, HELLENIC LOTTERIES S.A. commits to the protection of vulnerable social groups and of players with excessive participation in games of chance, and within this framework, the Company sets as a priority the development and implementation of a comprehensive plan and method for the referral of players to support and treatment bodies for the treatment of any problematic behaviors that may be associated with the excessive participation in its games.

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

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HELLENIC LOTTERIES S.A. ensures that the information regarding the referral to support and treatment bodies is included in all corporate websites, the means used for the conduct of games of chance (e.g. tickets, Guides, program etc.), the informational material, as well as in advertising and communication activities. Furthermore, HELLENIC LOTTERIES S.A. ensures that the Company's personnel and all its Partners are aware and can provide relevant information to the players and their relatives and friends, when needed.

5. Responsible Gaming and HELLENIC LOTTERIES S.A. Personnel

HELLENIC LOTTERIES S.A. continuously commits itself to the best personnel understanding of Responsible Gaming principles. The Company ensures that Responsible Gaming principles are adopted by all its employees and integrated to all relevant corporate processes and policies. For this reason, the present HELLENIC LOTTERIES S.A. Personnel Policy on Responsible Gaming has been developed.

5.1. Purpose

The HELLENIC LOTTERIES S.A. Personnel Policy on Responsible Gaming stresses the importance of the full compliance with Responsible Gaming principles, while at the same time informs the personnel of the Company regarding the rules and principles that shall govern the general conduct of the personnel.

5.2. Scope

The HELLENIC LOTTERIES S.A. Personnel Policy on Responsible Gaming constitutes an integral part of the overall Responsible Gaming Policy, and is implemented by all employees of HELLENIC LOTTERIES S.A., who are obliged to abide by and follow the principles and rules contained in this Policy, as well as aim at their implementation by all their partners.

5.3. Rules and Principles

The personnel of HELLENIC LOTTERIES S.A., as well as of OPAP S.A., is not allowed to participate in the games of chance provided through VLTs and in the games provided online (through the Internet) by OPAP Group, in accordance with the Code of Conduct of OPAP Group.

5.4. Information

HELLENIC LOTTERIES S.A. implements a comprehensive awareness campaign on Responsible Gaming, which includes informational material distributed to the personnel and other relevant actions

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regarding Responsible Gaming. The main message of its awareness campaign communicates the basic rules of Responsible Gaming:

- Play for the joy of the game.
- Take frequent breaks.
- Set a time and a spend limit.
- You do not play if you are under 18 years old.

All HELLENIC LOTTERIES S.A. employees shall be able to recognize the campaign's main message and the above Responsible Gaming basic rules.

5.5. Training

HELLENIC LOTTERIES S.A. implements a comprehensive training program on Responsible Gaming addressed to its employees and to OPAP employees. The program also includes special training seminars addressed to specific groups of employees (e.g. Call Center employees, Sales Team). Reviewing of the training program is performed periodically. Furthermore, HELLENIC LOTTERIES S.A. makes sure that all newly hired employees of the Company are informed and trained accordingly.

The Human Resources Division of OPAP S.A., with the support of the Responsible Gaming Team, is competent for the design and implementation of the relevant training program on an annual basis, as well as the assessment of the employees' awareness on Responsible Gaming, through relevant questionnaires and employee surveys.

HELLENIC LOTTERIES S.A. shall make every possible effort to provide all means, including technological means, for the proper execution and enhancement of the training program.

5.6. Training Objectives

Even though the majority of employees working at HELLENIC LOTTERIES S.A. offices does not have direct contact with players-clients, its training on Responsible Gaming is deemed necessary so that all people working at HELLENIC LOTTERIES S.A. be aware of the strategy and the priorities of OPAP Group in this field, as well as of the integration of Responsible Gaming principles as an integral part of its new business initiatives.

HELLENIC LOTTERIES S.A. provides training to its personnel according to the principles and rules of Responsible Gaming, so that the employees are able to:

- understand the main principles and rules of Responsible Gaming;
- provide the players with information concerning the rules of Responsible Gaming, as well as information on where to receive support, in case they present a problematic behavior in terms of excessive participation in its games of chance;
- provide Agents and other partners of the Company with information on Responsible Gaming;

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- monitor compliance with the prohibition of minors and of persons accompanying minors, from entering venues where the games of HELLENIC LOTTERIES S.A. are conducted and from participating thereto, and monitor the protection of vulnerable social groups.
- recognize signs of problematic behavior;
- handle with discretion and sensitivity possible cases of unacceptable behavior of Players, brought to their attention, and take necessary measures for the elimination of such behavior.

The training enhances HELLENIC LOTTERIES S.A.'s expectations and understanding of key actions associated with educating Players regarding issues relating to Responsible Gaming. This training aims at complementing the broader strategy of HELLENIC LOTTERIES S.A. on Responsible Gaming, and provides the Company's employees with the necessary knowledge, in order for them to be able to respond to eventual Players' requests for information regarding Responsible Gaming and for their referral to support and treatment bodies.

5.7. Compliance with Training Requirements

The training on Responsible Gaming is mandatory for all HELLENIC LOTTERIES S.A. employees, while the participation in training programs is monitored by the Company's Human Resources Division.

5.8. Reporting Incidents

All employees shall report incidents of Players' problematic behavior or of minors' participation in the games provided by HELLENIC LOTTERIES S.A. that may be brought to their attention. HELLENIC LOTTERIES S.A. General Division of Legal, Regulatory and Compliance Affairs is responsible for receiving, recording and handling reports of such incidents.

6. Responsible Gaming and HELLENIC LOTTERIES S.A. Points of Sale

HELLENIC LOTTERIES S.A.'s Points of Sale Network is the main point of contact of the Players with its conducted games. The training and compliance of all those participating in HELLENIC LOTTERIES S.A.'s Network with the regulatory framework and the rules of the Company on Responsible Gaming constitutes an essential part of its strategy.

HELLENIC LOTTERIES S.A. ensures that OPAP S.A. Retailers, Wholesalers, Agents and all employees working in HELLENIC LOTTERIES S.A.'s Network are aware of, adopt, and implement Responsible Gaming principles in their daily operations.

6.1. Purpose

With the Responsible Gaming Policy of HELLENIC LOTTERIES S.A. Points of Sale Network, the relevant rules and principles that shall govern the conduct and professional practice of Agents, Managers of Agencies, Retailers and Wholesalers, as well as all HELLENIC LOTTERIES S.A. Network employees, are promoted.

6.2. Scope

The Responsible Gaming Policy of HELLENIC LOTTERIES S.A. Points of Sale Network constitutes an integral part of the Responsible Gaming strategy. Its scope applies to all Agents of HELLENIC LOTTERIES S.A.'s Network, Managers of Agencies, Retailers and Wholesalers, as well as all HELLENIC LOTTERIES S.A. Network employees, who are obliged to abide by and follow the principles and rules contained in the Policy, as well as to see to their proper implementation.

6.3. Rules and Principles

6.3.1. Basic Rules

Regulatory and Contractual Obligations

Based on the provisions of the General Regulation on the Conduct and Control of State Lotteries, as applicable, the sale of State Lotteries to minors, namely to persons younger than 18 years of age, is prohibited.

The partners, Agents, Managers of Agencies, Retailers and HELLENIC LOTTERIES S.A. Network employees:

- Shall provide players with information on Responsible Gaming rules.
- Shall prohibit minors from entering and staying at the Agencies.
- Shall prohibit adults from entering and staying at the Agencies, when they accompany minors.
- Shall prohibit minors from participating in HELLENIC LOTTERIES games.
- Shall prohibit the participation in the games and/or the access to the store to those who seem to be under the influence of alcohol or other addictive substances, or seem to be drowsy, and in general when it is obvious that their general state cannot guarantee the conduct of Responsible Gaming.
- Shall not pay winnings to minors.
- Shall not hand tickets of HELLENIC LOTTERIES S.A. games to minors.
- Shall not lend money to players.
- Shall not provide alternative means of payment or credit.

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- Shall provide an Information Point with informational material on Responsible Gaming and on HELLENIC LOTTERIES S.A. games of chance, as well as special signage supplied to them by the Company.
- Shall not encourage the excessive participation in HELLENIC LOTTERIES S.A. games.
- Shall not underestimate the problem and shall take action when they identify signs of problematic gaming behavior.
- Shall not accept to play on behalf of a player.
- Shall verify the age of a player in case of doubt.
- Shall handle eventual unacceptable behavior of players with discretion and sensitivity and take the necessary measures for the elimination of such behavior.
- Shall encourage players to take breaks from their participation in games of chance.
- Shall assist players and their relatives and friends to handle the problems relating to excessive participation in HELLENIC LOTTERIES S.A. games of chance by referring them to the competent services of prevention and treatment.
- Shall encourage players to set limits as to the amount of time and money that they are willing to spend on gaming.
- Shall report to HELLENIC LOTTERIES S.A. incidents of unacceptable behavior of players related to Responsible Gaming.

6.3.2. Protection of Persons that have not Reached the Age required by Law from the Participation in HELLENIC LOTTERIES Games of Chance

The sale of State Lotteries to minors is prohibited. The owners and employees at the Points of Sale are obliged to impose such strict prohibition.

Prohibitive signs provided by HELLENIC LOTTERIES S.A. shall be, at any time, clearly and distinctly, placed in the interior and exterior of the points of sale, concerning the responsible conduct of games, the minimum permitted age for participation in the games of chance, etc.

The special signs provided by HELLENIC LOTTERIES for the prohibition of entry of minors in the agencies and of their participation in the games of chance shall be always placed, clearly and distinctly, at the entrance. A respective obligation applies both to Retailers and to Wholesalers, whom HELLENIC LOTTERIES S.A. provides with pins or stickers of relevant content, which they are obliged to place on themselves or at visible points of their point of sale (e.g. at the front glass side of the kiosk, etc.). All employees of the agencies are obliged to fully comply with this obligation and to follow the procedure of age identification of customers, in case they are in doubt.

6.3.3. Age Identification – Procedure

Whenever Agents and employees of HELLENIC LOTTERIES S.A. Points of Sale Network are not sure about the age of a person, they shall be obliged **to request the demonstration of his/her Police identity card (ID card) or passport** .

Subsequently, and in any of the following cases, namely: a) if the potential player does not carry an ID card or passport; or b) the player is younger than 18 years of age; c) the player seems to be under the influence of alcohol or other addictive substances, or seems to be drowsy and, in general, when it is obvious that his/her general state cannot guarantee the conduct of Responsible Gaming, the partners, Agents, Managers of the Agencies and employees of HELLENIC LOTTERIES S.A. Points of Sale Network **are obliged:**

- To explicitly prohibit the entry and stay of the minor at the Point of Sale and his/her participation in HELLENIC LOTTERIES S.A. games.
- To immediately notify HELLENIC LOTTERIES S.A. of such incident.

In case of foreign young nationals, the demonstration of an equivalent, valid identification document issued by a Public Authority, such as residence permit, passport, expatriate identification card/ foreign identification card, showing the person's date of birth, shall be requested.

Salesmen and employees of HELLENIC LOTTERIES S.A. Points of Sale Network shall guarantee that, in case a minor is accompanied by a parent or an adult, the entry in the Agency and the participation in HELLENIC LOTTERIES S.A. games shall be conducted only by the adult person. In this case, they shall advise the adult that the entry and stay of minors at the Agency, as well as their participation in HELLENIC LOTTERIES S.A. games are prohibited.

In addition, HELLENIC LOTTERIES S.A. Points of Sale and their employees, including OPAP Agents, shall not pay winnings, nor hand tickets to minors.

6.3.4. Recognizing Players' Problematic Behavior

Agents and employees of HELLENIC LOTTERIES S.A. Agencies shall be aware that the following signs may be indicative of a player's problematic behavior:

- When the participation in HELLENIC LOTTERIES games becomes the most important and interesting thing in his/her life.
- When the amount of time and money spent on games is escalating.
- When he/she does not know when to stop playing.
- When he/she unsuccessfully tries to stop playing or reduce his/her playing frequency.
- When he/she becomes irritable when trying to stop or reduce playing.
- When he/she lies about how much he/she plays.
- When he/she steals or commits other unlawful actions to play HELLENIC LOTTERIES games.

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- When he/she risks his/her relationships, job, family life or a good opportunity for the sake of playing HELLENIC LOTTERIES games.
- When he/she spends more money on games of chance than he/she can actually afford.
- When he/she feels guilty when playing.
- When persons close to him/her complain about his/her participation in HELLENIC LOTTERIES games.
- When he/she borrows money to play.

6.3.5. Assistance and Referral to Support and Treatment Bodies

All Agents, Managers of Agencies, and all employees of HELLENIC LOTTERIES S.A. Points of Sale Network shall be able to provide assistance to players demonstrating a problematic playing behavior.

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

- He/she should not spend on HELLENIC LOTTERIES money earmarked for other purposes.
- When losing, he/she should not continue playing with the belief that he/she is going to come even.
- He/she should not think of gaming as a solution to his/her everyday problems.
- He/she should not borrow money to play.
- He/she should not consider the money he/she spent on gaming as a form of investment.
- He/she should not lie to his/her relatives and friends about the time and money spent on gaming.
- He/she should take breaks from his/her participation in HELLENIC LOTTERIES games, so that he/she is conscious of the duration of his/her participation.
- He/she should ask for help if he/she feels that his/her participation in HELLENIC LOTTERIES games is no longer a form of entertainment for him/her.

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

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

6.3.6. Training of HELLENIC LOTTERIES S.A. Points of Sale Network

HELLENIC LOTTERIES S.A. implements a comprehensive Responsible Gaming training program, which is reviewed periodically. Participation of Agents, Managers of the Agencies, Wholesalers, Distributors and of the personnel of HELLENIC LOTTERIES S.A. Points of Sale Network shall be mandatory for all training programs of HELLENIC LOTTERIES S.A. on Responsible Gaming, and attendance shall be supervised by the competent Division of HELLENIC LOTTERIES S.A. Trainings are conducted:

- At OPAP S.A. training centers, in Athens and Thessaloniki.
- Locally, per prefecture or region, in a town and place that meets the conditions of implementation of each training.
- Through the Internet, via an online training platform (e-learning), if applicable based on the subject of the training, aiming at the direct access of the trainee to knowledge from their place of work or residence.
- Within the Agency, during its working hours (on the job training).

6.3.6.1. Training Objectives

It is a core priority for HELLENIC LOTTERIES S.A. to provide training on Responsible Gaming rules and principles to HELLENIC LOTTERIES S.A. Points of Sale Network, complementing OPAP Group strategy, given that the said Network is the main point of contact with customers. At the same time, through the provided training, HELLENIC LOTTERIES S.A. raises awareness of the Company's Responsible Gaming priorities and the integration of Responsible Gaming principles to its daily business operations.

Its Salesmen are requested to sign a special declaration form, upon completion of their induction training by HELLENIC LOTTERIES S.A., stating that they acknowledge the main Responsible Gaming principles and rules.

The partners having concluded a Wholesale contract with HELLENIC LOTTERIES S.A. are obliged to ensure that all Retailers of their Network receive information and training on Responsible Gaming rules and principles, according to the instructions given to them by HELLENIC LOTTERIES S.A.

6.3.6.2. Employees at Points of Sale

HELLENIC LOTTERIES S.A. Network's Salesmen are obliged to provide their employees with appropriate training and information regarding the principles, rules and HGC decisions governing Responsible Gaming.

The HELLENIC LOTTERIES S.A. Points of Sale Network is obliged to ensure that all its employees comply with the rules of Responsible Gaming, as well as that they are properly trained to inform Players on Responsible Gaming principles. HELLENIC LOTTERIES S.A. Points of Sale shall be responsible for

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any actions or omissions of their employees that violate their regulatory and contractual obligations, including violations of the provisions of the present Policy.

6.3.7. Raising Awareness and Providing Information

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

- Play for the joy of the game.
- Take frequent breaks.
- Set a time and a spending limit.
- You do not play if you are under 18 years old.

All Salesmen and employees of HELLENIC LOTTERIES S.A. Points of Sale Network are expected to be able to recognize the campaign's main message and the aforementioned Responsible Gaming basic rules.

6.3.8. Reporting Incidents

Agents and partners of HELLENIC LOTTERIES S.A. Network shall report incidents related to Responsible Gaming to the Company, following the procedure posted on opapnetlaxeia, the official online communication point of the Company with the partners. The General Division of Legal, Regulatory and Compliance Affairs is responsible for receiving, recording and handling reports of such incidents.

6.3.9. Contractual Obligation

According to the terms of the Agreements governing the relation between HELLENIC LOTTERIES S.A. and its partners, the Policies issued by the Company are binding to them and constitute an integral part of their Agreements. The Agents, Managers of Agencies and the personnel employed in general, as well as the State Lotteries Retailers and Wholesalers shall comply with the eventually applicable Commercial Policy and other HELLENIC LOTTERIES S.A. Policies, including the Policy on Responsible Gaming.

6.3.10. Monitoring Compliance with Responsible Gaming Rules

Both HELLENIC LOTTERIES S.A. and the Hellenic Gaming Commission (HGC) have the right to monitor the Network's compliance with Responsible Gaming rules and principles and, in this respect, conduct relevant inspections at the Agencies or other points.

The monitoring of compliance of the Points of Sale Network with Responsible Gaming rules is conducted through any available means, inter alia through persons appearing with the use of mystery shopping techniques (Mystery Shoppers) and/or the conduct of inspections using Auditors.

6.3.11. Sanctions

Non-compliance of Agents, Managers of Agencies and of Agencies' employees, as well as of State Lotteries Retailers and Wholesalers with the basic rules of Responsible Gaming entails the imposition of sanctions according to the relevant procedure, and in case of re-occurrence of non-compliance, it may even constitute significant cause for termination of the Agreement concluded between HELLENIC LOTTERIES S.A. and the Partner.

7. HELLENIC LOTTERIES S.A. Commercial Communication Policy on Responsible Gaming

According to decision no. 79292 EΞ 2020 of the Minister of Finance titled "Establishment of Games Regulation on the Commercial Communication of Games of Chance" (GGI 3260 B/5.8.2020), as applicable, Commercial Communication in the sector of provision of services of games of chance shall be implemented within a strict framework on the protection of consumers and Players.

Commercial Communication shall mean any advertising, promotion, and communication action, direct or indirect one, on games of chance, in the interior and exterior of OPAP Points of Sale Network, including all mass media, such as TV, radio, Internet, social media, advertisement in printed material or outdoor areas, personalized communication, namely communication through text messages or other means of modern technology, conducted solely and exclusively provided that an explicit relevant consent has been previously provided by the Players.

Commercial Communication shall be reasonable and strictly limited to any actions required so that consumers be directed to Games conducted by License Holders, thus clearly promoting the principles of Responsible Gaming. HELLENIC LOTTERIES S.A. ensures that Responsible Gaming principles are incorporated in all commercial communication actions of the Company. Any Commercial Communication plan shall be drafted in compliance with Responsible Gaming principles.

7.1. Purpose

The purpose of HELLENIC LOTTERIES S.A. Commercial Communication Policy on Responsible Gaming is to provide guidance both to HELLENIC LOTTERIES S.A. employees and to its external partners that are involved, in any direct or indirect way, in commercial communication actions on games of chance, by observing the Responsible Gaming principles and rules.

7.2. Scope

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

The agents, employees of OPAP agencies network and State Lotteries Retailers and Wholesalers shall strictly comply with the content of the present Policy, and shall see to the use, solely and exclusively, of the communication material on Responsible Gaming that is approved by the competent regulatory authorities, in accordance with the recommendations/ instructions/ announcements of HELLENIC LOTTERIES S.A. Any commercial communication material shall expressly mention the age limit for the participation in HELLENIC LOTTERIES games, the addiction and loss of property risks that may be entailed in the excessive involvement in the games, as well as helpline 1114, which is created and operated by OPAP S.A. in cooperation with KETHEA for the psychological support of players and of their relatives.

7.3. Rules and Principles

Commercial Communication on Games of Chance shall be governed by the following basic principles:

- The participation in Games shall be the result of free and independent personal will of the Players and it shall not be a result of deceit, pressing challenge or incitement.
- Commercial Communication shall be implemented within a strict framework on the protection of consumers and Players in the sector of service provision. Furthermore, Commercial Communication shall be reasonable and strictly limited to any actions required so that consumers be directed to Games conducted by License Holders, thus clearly promoting Responsible Gaming.
- HELLENIC LOTTERIES S.A. shall make sure that, during the planning of each Commercial Communication activity, Games are not rendered mundane, and that no positive image in relation to the fact that part of the revenues deriving from their conduct is destined for activities of public interest is promoted.

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- To this end, HELLENIC LOTTERIES S.A. drafts Commercial Communication plans, in accordance with the provisions of the Gaming Regulation on the Commercial Communication of Games of Chance, which are submitted for approval to the Hellenic Gaming Commission, in accordance with the provisions in the above Regulation. The actions implemented via each approved, per the above, Commercial Communication plan shall be always implemented by strictly observing Responsible Gaming principles, as well as by implementing the relevant decisions/ instructions of the Hellenic Gaming Commission. No commercial communication action shall be communicated unless previously approved by the competent Regulatory Authorities.
- Any commercial announcement addressed to the personnel or the partners of HELLENIC LOTTERIES, or to the wider audience through radio, TV and online media, as well as through advertisements in press media or outdoors, shall always comply with the provisions of the existing regulatory framework, as well as of the Regulation, during both the design and production, and the implementation of the said actions.
- Commercial announcements through TV broadcasting shall comply with the provisions of P.D. 109/2010 (A 190). Commercial announcements through radio and TV media shall be displayed during the advertising broadcast time, in accordance with the applicable provisions. No covert advertisements shall be executed. Any Commercial Announcement shall be directly acknowledged as an announcement of commercial promotion, of advertisement of OPAP Group services of games of chance, regardless of its type and of the medium used for its display.
- HELLENIC LOTTERIES S.A. ensures that:
 - The aforementioned rules and principles are strictly observed by all agents and employees of OPAP agencies Network, by HELLENIC LOTTERIES S.A. partners, by the employees in retail points of sale, as well as by its external partners/ suppliers (including advertising agencies) in the sector of Commercial Communication, by using all suitable means to this end (such as, indicatively: dispatch of announcements/ instructions, conduct of training seminars, etc.).
 - Commercial Communication shall fully comply with the eventually applicable relevant regulatory framework.

8. Stakeholder Engagement

HELLENIC LOTTERIES S.A. attributes great importance to the development of strong working relationships with all key stakeholders (stakeholder engagement), aiming at exchanging information and improving all pillars of Responsible Gaming strategy. In this framework, HELLENIC LOTTERIES S.A., as part of OPAP Group:

- Promotes the continuous participation of stakeholders and the mobilization of the academic and medical community, of Universities, Media and NGOs, via meetings in person and strategic partnerships, collaborations, sponsorships etc.
- Explores opportunities to give speeches to conferences and events related to its games.

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- Aids treatment bodies regarding the support to Players encountering problems related to excessive participation in HELLENIC LOTTERIES games.
- Cooperates with independent academic institutions for the conduct of researches on gaming issues.
- Promotes dialogue and cooperation with regulatory authorities and international organizations.
- Supports the continuous sharing of knowledge, dialogue and communication with all stakeholder groups, taking into account their views.

9. Report, Measurement and Certification

HELLENIC LOTTERIES S.A. monitors and gathers data relating to all aspects of Responsible Gaming, as well as data regarding the efficiency and effectiveness of its Responsible Gaming actions. The relevant monitoring mechanisms and performance indicators are reviewed constantly in order to be aligned with the Company's Responsible Gaming strategy and commitments. The data are analyzed and assessed based on transparent procedures, while relevant information is provided to the stakeholders through the Annual Results Report and the Annual Integrated Report of OPAP Group, as well as through other reporting mechanisms. To enhance its accountability in terms of Responsible Gaming, the Company focuses on the certification provided by international organizations.

10. Annual Review of the Responsible Gaming Policy

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

11. Revision History

Version	Date	Owner	Comments/ Main Changes
1	20/07/2022	Savvas Iliopoulos	Initial Version issued in 2015 is replaced by the present Policy.

12. Document Approvals

	Name	Title
Owner	Savvas Iliopoulos	Responsible Gaming Expert
Reviewed & Approved	Katerina Giannakakou-Razelou	Legal Manager- RG & Corporate Compliance
Approved	Nancy Verra	Chief Legal, Regulatory & Compliance Officer
Approved	BoD Meeting 06 / 29.06.2022	

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