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OPAP GROUP CODE OF CONDUCT

Approved by virtue of BoD Decision
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JULY 2016

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OPAP Group Code of Conduct

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1. Introducing the OPAP Group Code

1.1 Purpose and scope of the Code

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

The definition of OPAP Group currently refers to OPAP S.A., OPAP Services S.A., Hellenic Lotteries S.A., OPAP Cyprus Limited and OPAP Sports Limited but may in the future be extended to other companies controlled by OPAP S.A.

The definition of Stakeholders includes Members of Board of Directors, Chief Unit Officers, Managers and Employees of the OPAP Group.

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 disciplinary or other penalties internally or externally.

1.2 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 Compliance Officer (see ‘Raising Concerns’ section below).

1.3 What is expected of all Stakeholders?

- Acknowledge this Code by signing the Statement of Compliance and by returning it to the HR/ Organosis & Internal Communication Division. HR/ Organosis & Internal Communication Division will gather all the statements and return them to the Compliance Officer. Stakeholders who have already acknowledged previous versions of the Code are obliged to familiarize themselves with the provisions of any subsequent versions.
- Always follow the law and license regulations that apply to OPAP Group’s business activities.
- If anyone thinks that these have been breached, there is an obligation to raise concerns (see ‘Raising concerns’ section below).

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

- Ensure that his/her team knows about the Code and how it affects them.
- All team members (including manager) have signed the Statement of Compliance attached and returned it to the HR/ Organosis & Internal Communication Division. HR/ Organosis & Internal Communication Division will gather all the statements and return them to the Compliance Officer.

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- Act responsibly and professionally if his/her direct reports bring to his/her attention any allegations that the Code has been breached

1.4 Raising concerns

The Code seeks to set out how Stakeholders should act on behalf of the business. If you suspect that the Code, or the laws that underpin it, are not being followed, you have an obligation to report it.

Who should I contact if I consider that the Code may have been breached?

In the first instance you should contact your immediate manager in case you are an employee or the Compliance Officer if you are a member of the Board or Chief Officer. If you cannot speak to your immediate manager for any reason, you can contact the number 210 5798193 (see "Whistleblowing Complaints", page 15).

Stakeholders will not be penalized for speaking up. Accordingly, OPAP Group will make all proper efforts to protect the confidentiality of Stakeholders who do raise concerns. Any attempt to deter Stakeholders from raising proper concerns will be treated as a serious disciplinary offence.

2. Governing principles and company values

The positive reputation of OPAP Group and trust in its integrity are vital for sustaining public confidence in its operations. OPAP Group also recognizes its responsibility to safeguard and uphold the good reputation of all companies included in the Group. Operating within the terms of this Code and upholding the OPAP Group values is of fundamental importance and is every Stakeholder's responsibility.

- **Our Principles**

- ✓ Responsiveness
- ✓ Transparency
- ✓ Efficiency
- ✓ Teamwork

- **Our Values**

- ✓ **Quality**


Quality is an expression of our goal to offer reliable products and services. In all aspects of our operations the focus shall be on customers' needs and expectations.

- ✓ **Responsibility**

We are responsible towards our customers, shareholders and all stakeholders for fulfilling our commitments, accepting the responsibility for our actions and developing a culture of Responsible Gaming.

- ✓ **Innovation**

Innovation is the basis of our success and it is a competitive advantage, which allows us to meet the needs of our customers, to create opportunities and to define the future of our business.

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✓ **Integrity**

We balance what our customers and business partners ask from us with what people of the communities we operate in, expect from us.

✓ **Respect**

Respect our customers, employees, partners and the people of the communities we operate in. Respect starts with listening openly and honestly to the diversity of people and ideas around us.

• **Our main Focus:**

- ✓ Growth and efficiency
- ✓ Responsible Gaming

All Stakeholders are expected to adhere to OPAP Group's values and principles in their business dealings. All Stakeholders must conduct themselves in an ethical manner in accordance with this Code in all dealings on behalf of OPAP Group.

3. Operational Framework

3.1 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.

3.2 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 to participants, tasteful and decent and must not in any way bring OPAP Group into disrepute. All sales activity must respect the privacy of participants and conform to the relevant Group Policies.

Company' Stakeholders may receive inquiries from representatives of the news media. The Stakeholder should only identify the person making the inquiry and the organization for which he or she works. The person, depending on the inquiry, should be politely referred to the competent Chief Unit Officer, to the CEO's office or to the Chief Corporate Communication & Public Relations Officer who is OPAP Group' s assigned spokesman.

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4. Personal and business integrity

4.1 Conflicts of interest

Conflict of Interest may arise when Stakeholders are pursuing personal interests that run contrary to the Company's interests. In order to avoid any possible conflict of interest between position within OPAP Group and relationships with third parties, Stakeholders must seek OPAP Group's permission before becoming involved with any company or firm which is, or may be, a competitor or supplier, or other than player of the Group.

Similarly, if a Stakeholder knows that any member of his/her family, or any other person with a close personal relationship, 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.

Stakeholders should not hold financial investments in companies that are major suppliers, partners or agents of OPAP Group, or if they do, they should disclose it using the "Special Declaration" Form. Details of current suppliers can be obtained from the Procurement Division and the form mentioned above by the Compliance Officer.

Stakeholders should notify their immediate manager (in the case of employees) and the Compliance Officer of all actual or potential conflicts of interest. The Compliance Officer will maintain a register of such declarations and advise accordingly. Managers shall maintain a record of any stated actual or potential conflict of their team.

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.

4.1.1 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 non-cash gifts of value indicatively not more than € 250 arising out of customary business practices.


4.1.2 Political contributions

OPAP Group will not pay any retainer or commission or donations to any political party or elected officer nor will OPAP Group offer financial or other advantage to any candidate for, or holder of, a position of public office or a political party in all jurisdictions. OPAP Group's policy is to comply with relevant laws as dictated in any given jurisdiction and other related internal policies.

4.2 Competition law

OPAP Group does not seek competitive advantages through illegal or unethical business practices. OPAP Group is subject to competition laws in all countries where it operates.

Competition law is complicated and wide-ranging; Infringement of competition legislation may expose the OPAP Group companies to serious financial penalties and reputational harm. Furthermore, a Stakeholder who is responsible for such violation may be subject to civil and criminal liability, in

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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 General Legal Counsel before embarking on any activity which could potentially breach competition law.

4.3 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 (i.e. Asset Acceptable Use Policy, Social Media Policy, etc).

4.4 Prohibition of play

As a Stakeholder of OPAP Group you will not be eligible to participate in any OPAP Group offered game, for which applicable law imposes specific participation restriction. OPAP Group will keep you informed on any participation restrictions.

Over and above the prohibitions imposed by the applicable laws and / or statutory regulations, OPAP Group has implemented the following participation restrictions, with respect to betting games offered by OPAP Group, both offline (base landed) and online (via internet):


Stakeholders, who: a) are members of the personnel of the Group, or b) due to their job tasks have access to confidential information concerning the betting games or are directly involved in the process of conducting the game, should not:

- Participate to the betting games regardless of their form, offline (land based) or online (via internet).
- 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.

The aforementioned restrictions / rules are also extended to partners, consultants, individuals and legal persons that are working or are offering their services for the betting games and have become recipients of information in a similar way.

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 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 law and internal policies of OPAP Group. If in any doubt on the applicability of the prohibition to you, please contact the General Legal Counsel and/or the Compliance Officer.

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4.5 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 and Policy on Issuance of Winnings Certificates.

4.6 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 around the world. 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 to their immediate manager (in case of employees) in accordance to the "Whistleblowing Policy" (page 15).


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 your immediate manager or the 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.

4.7 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 Compliance Officer or the General Legal Counsel. 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 General Legal Counsel and the 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 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.

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4.8 Products and Services Quality

OPAP Group provides guidance to Stakeholders based on the related documented procedures of ISO 9001 Quality Management Standard in order to ensure that its products and services meet statutory and regulatory requirements and customers' needs.

4.9 Environment

OPAP develops and implements policy and objectives, aiming at the improvement of the interaction with the environment, in compliance with the legal requirements and the Environmental Management Standard ISO 14001. Having determined the environmental aspects and risks, OPAP seeks ways to control its environmental footprint, through recycling and control of energy and natural resources consumption.

OPAP Group's environmental impact is reported as part of the Corporate Social Responsibility Report.

4.10 Health and Safety

OPAP Group, based on National Labor Laws and International Human Rights Norms, protects and supports its personnel through documented procedures and policies, in compliance with Social Accountability Standard SA8000 and provides its personnel a healthy and clean environment, where they can work with safety.

Stakeholders are expected to comply with the current Health and Safety regulations.

4.11 Business monitoring and control


OPAP Group takes steps to provide for the maintenance of proper accounting methods and the reliability of financial information used within the business or for publication.

It is the Company's policy to maintain books, records and accounts in reasonable detail to reflect accurately and fairly all of the Company's transactions. The Company and its subsidiaries maintain a system of internal accounting controls designed to reinforce policy compliance.

5. The resources of OPAP Group and its customers

5.1 Confidentiality

In OPAP Group we value and protect our confidential information and we respect the confidential information of others. "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. 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 only under OPAP Group's Whistleblowing policy (see "Whistleblowing Policy", page 15), or as required by law or court order. In all such cases, Stakeholders must inform the person responsible for the confidential

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information and/or the General Legal Counsel 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.

5.2 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 corporate intranet.

If you have any question about these issues, please address to the Compliance Officer or the Investors Relations Office.

5.3 Intellectual property

All records, documents, papers (including copies and summaries of them), works 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 their immediate manager or the General Legal Counsel 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.

5.4 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, financial facilities, computer hardware and software, furniture, etc.) and intangible (trade secrets, patents, trademarks, intellectual property, information, etc.) assets. 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 Unit or, in case of employees, to their immediate manager as they come to their attention.

5.5. 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

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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, abuse@opap.gr), following appropriate procedures. In case you need further clarifications, please address Risk & Security Unit.

5.6 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 Unit. In case you need further clarifications, please contact the Risk & Security Unit.

5.7 Data protection (Company 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.


Personal information about individuals that OPAP Group staff may retain, have access to, or learn in the course of their duties, must not be disclosed without good reason and justification otherwise than accordance with the law.

In addition, breach of the DPL by Stakeholders may be treated as a disciplinary offence and dealt with in accordance with OPAP’s Labor Regulation. Any member of staff, who considers that the policy has not been adhered to, should raise the matter with the immediate manager (in case of employees) or the Compliance Officer.

It is recognized that Data Protection laws, policies, and definitions vary between jurisdictions. For the avoidance of doubt, OPAP Group’s policy is to comply with local laws and policies with respect to Data Protection and you must ensure you are aware of, and comply with, local requirements if obtaining and processing personal data abroad. If in doubt, ask by conferring with immediate manager (in case of employees) and Head of Information Security and Data Protection or the Compliance Officer.

5.8 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.

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5.9 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 Communications Division could organize a press conference and handle all media interest on his/ her behalf, including the press releases.

If winners request anonymity, 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 and time it was played, the amount won etc.

5.10 Preventing excessive and underage play

OPAP Group is committed to preventing excessive and under-age play in its design, promotion, and monitoring of 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.

6. Our people

6.1 Respect for the individual

OPAP Group treats its Stakeholders with respect while it is expected that its managers shall fulfil their responsibilities regarding the training and development of their subordinates. Office hours, leaves and other administrative rules are included in OPAP's Labor Regulation. In case you need clarifications, talk to your immediate manager or the Administration Unit.


6.2 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 informally and confidentially with their immediate manager in the first instance or the Administration Unit.

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

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6.3 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.

7. Whistleblowing Policy

7.1 Implementation - Violations

Implementation of this Code is obligatory. All Stakeholders are obliged to familiarize themselves with the contents of the Code and the relevant procedures and are accountable for compliance with its rules and principles.

Likewise, Compliance is obliged to brief Stakeholders about the Code, its amendments (if any) and the relevant procedures, to encourage them to adopt a positive, open-minded working attitude, to feel that they can easily express their concerns and to implement measures after investigations have been carried out. General information on the Code policies and relevant procedures should be provided by HR/Compensation & Benefits to every new employee. All new employees should sign upon recruitment the Statement of Compliance of the Code. HR/ Organosis & Internal Communication Division should forward all forms to the Compliance Officer. The Statements of Compliance (of existing and new employees) are kept by the Compliance Officer.


Compliance with the Code is everyone's responsibility and no one can justify an unethical act by saying that it was directed by someone in a superior position. Support and familiarization is offered, where required, in order to ensure the full understanding of rules and principles set forth in the Code. Where there is confusion or doubt, clarifications should be sought out by Stakeholders through their immediate manager, the Compliance Officer or the General Legal Counsel.

All Stakeholders should sign the attached Statement of Compliance and return it to the Compliance Officer.

Any Stakeholder who violates the Code may be subject to performance or disciplinary consequences including termination of service, subject to local laws and regulations. Where an action is also in breach of the law, the Stakeholder in breach may be subject to civil or criminal law consequences.

7.2 Whistleblowing complaints

Stakeholders who have genuine concern about matters which they believe may violate the Code are encouraged to seek advice from their immediate manager or the Compliance Officer or the General Legal Counsel.

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OPAP Group has assigned to the Compliance Officer the task of receiving whistleblowing complaints from Stakeholders or business partners.

Please note that if the complaint contains a reference to natural persons, it must not contain information which is sensitive personal data.

OPAP Group cannot dismiss, threaten, harass or discriminate in any way against a Stakeholder who blew the whistle and will protect any Stakeholder who raises a concern honestly. However, it is a violation of the Code to knowingly make a false accusation, lie to investigators, or interfere or refuse to cooperate with a Code investigation. Honest reporting does not mean that you have to be right when you raise a concern; you just have to believe that the information you are providing is accurate.

Methods for making a whistleblowing complaint


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

- By sending an email to 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.

If a whistleblowing complaint is submitted, the Compliance Officer is obliged to immediately examine the incident the complaint relates to and to obtain information about whether such an incident is well-founded or not. The Compliance Officer cannot leave the incident unexamined.

All information relating to the whistleblowing complaint must be treated as confidential OPAP Group information.

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8. 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
- 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

9. Review

Provision for information when amendments are made.

Owner: The Compliance Officer

Authorized by: OPAP S.A. Board of Directors

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Statement of Compliance

To the Compliance Officer of ☐ OPAP S.A. /OPAP Services S.A. ☐ Hellenic Lotteries S.A.

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. I am presently unaware of any violation of the Code of Conduct that I have not reported as required.

Please sign here:..... Date:.....

Please print your name:.....

Please return the signed and completed Statement to the HR/Organosis & Internal Communication Division. HR/Organosis & Internal Communication Division will gather all the statements and forward them to the Compliance Officer