

CORPORATE RESPONSIBILITY REPORT 2015



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A. Message from the CEO

Dear Stakeholder,

At OPAP we recognize that the sustainability of our operation is driven by our focus on conducting our business with responsibility and ethics. On that principle we are constantly working on integrating more responsible ways of operating across the board, while contributing effectively to social well-being.

On that principle and despite the significant shift of the financial landscape in 2015, we demonstrated agility, commitment and consistency, bringing into life our purpose “Entertainment I trust”. Our great gains in each one of our corporate responsibility focus areas and our positive impact in the community make us particularly proud each and every day. Moreover, it fills us with endurance to maintain our leading performance and honor the trust of the Greek community.

It is my pleasure to share with you our Corporate Responsibility Report, which has been prepared according to the Global Reporting Initiative's G4 Guidelines and provides a platform for, both, sharing our results and setting the ground for future achievements.

Creating a safe and respectful environment for our players

In 2015, our company received a rare distinction that underpins our commitment to Responsible Gaming and acknowledges that our strategy is on the right track. OPAP S.A.

and Hellenic Lotteries S.A. have received a Level 3 certification from the World Lottery Association, becoming the only companies in Greece to have been certified.

We will continue to set demanding targets that drive fundamental change within the gaming sector.

Fostering a better future for the young generation

In a period of time when societal needs are evolving at a blistering pace, we have strengthened our community focus on scale effective programs making a long-lasting impact to more than 1.7 million of people in the country.

Our well-articulated, concrete and solid Corporate Responsibility Strategy, which remains our guiding compass, has led us to the significant results that we are proudly sharing with you in this report. More specifically, in 2015, OPAP delivered two fully renovated floors in the Children's Hospitals, “Agia Sophia” and “P&A Kyriakou” and today we continue our work, aiming to achieve a complete upgrade of the Hospitals' medical infrastructure for our children. In the pillar of youth sports, the “OPAP Sports Academies” program offers a step-change on sport education. Today, our company supports 125 Sports Academies in 48 prefectures of Greece, instilling sports values to 10,400 children and standing by the side of 20,000 parents.

Valuing the talent of our people

Through this report, I would like to express my sincere appreciation to all our employees, who have always been the cornerstone of our successful operation as a business. The effort, passion and commitment of all people at OPAP made a difficult year to be remembered for some significant achievements that we are proud of.

Future outlook

Our results in 2015 reflect our determination to seize opportunities and consequently deliver sustainable long-term growth.

By sharing our experience, documenting and identifying the challenges that lie ahead, we are certain that OPAP will continue to be motivated by opportunities and play a significant part in positively shaping a better future for youth in Greece.

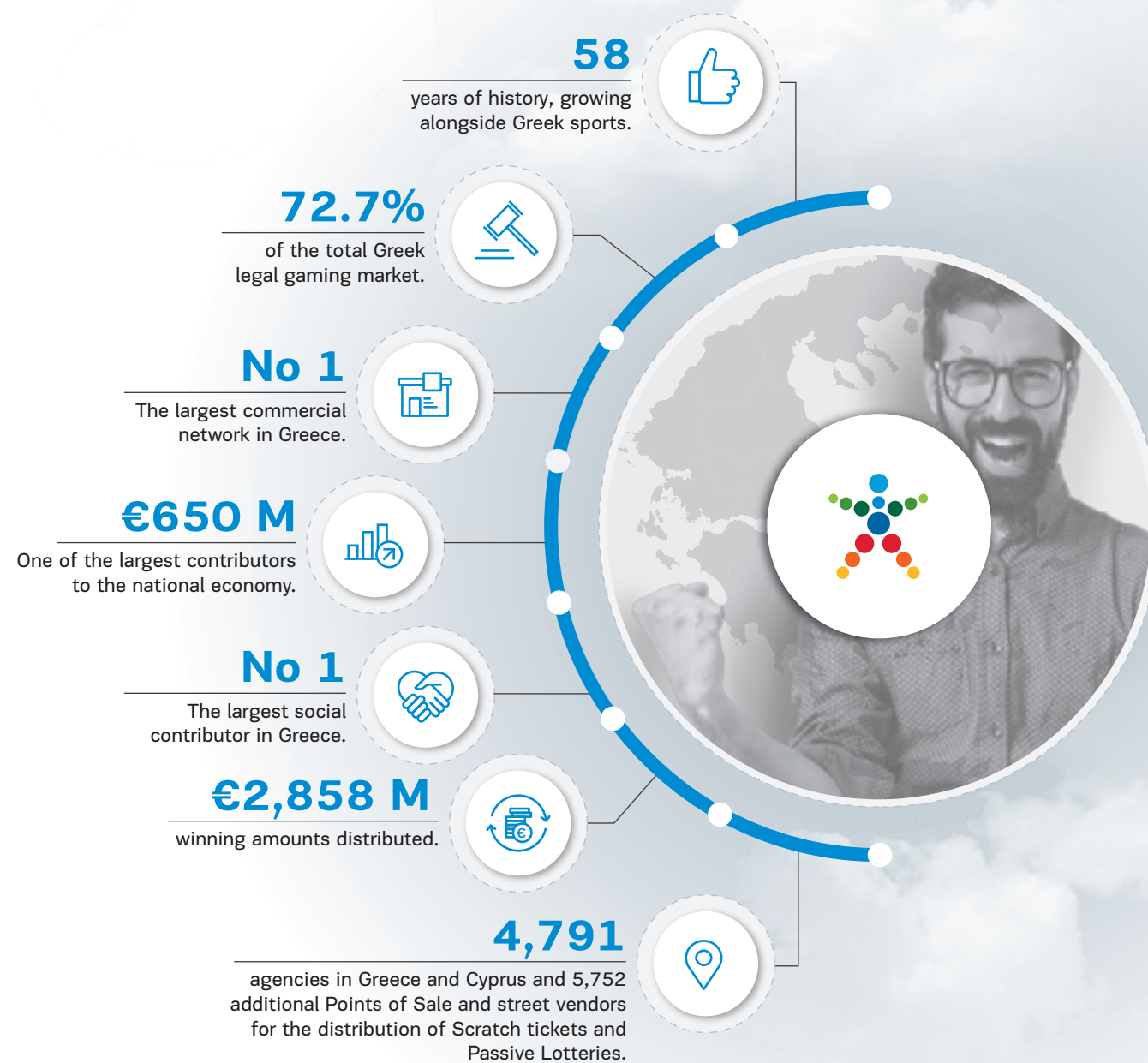
Have a pleasant read,

Kamil Ziegler
Chairman of the BoD and CEO

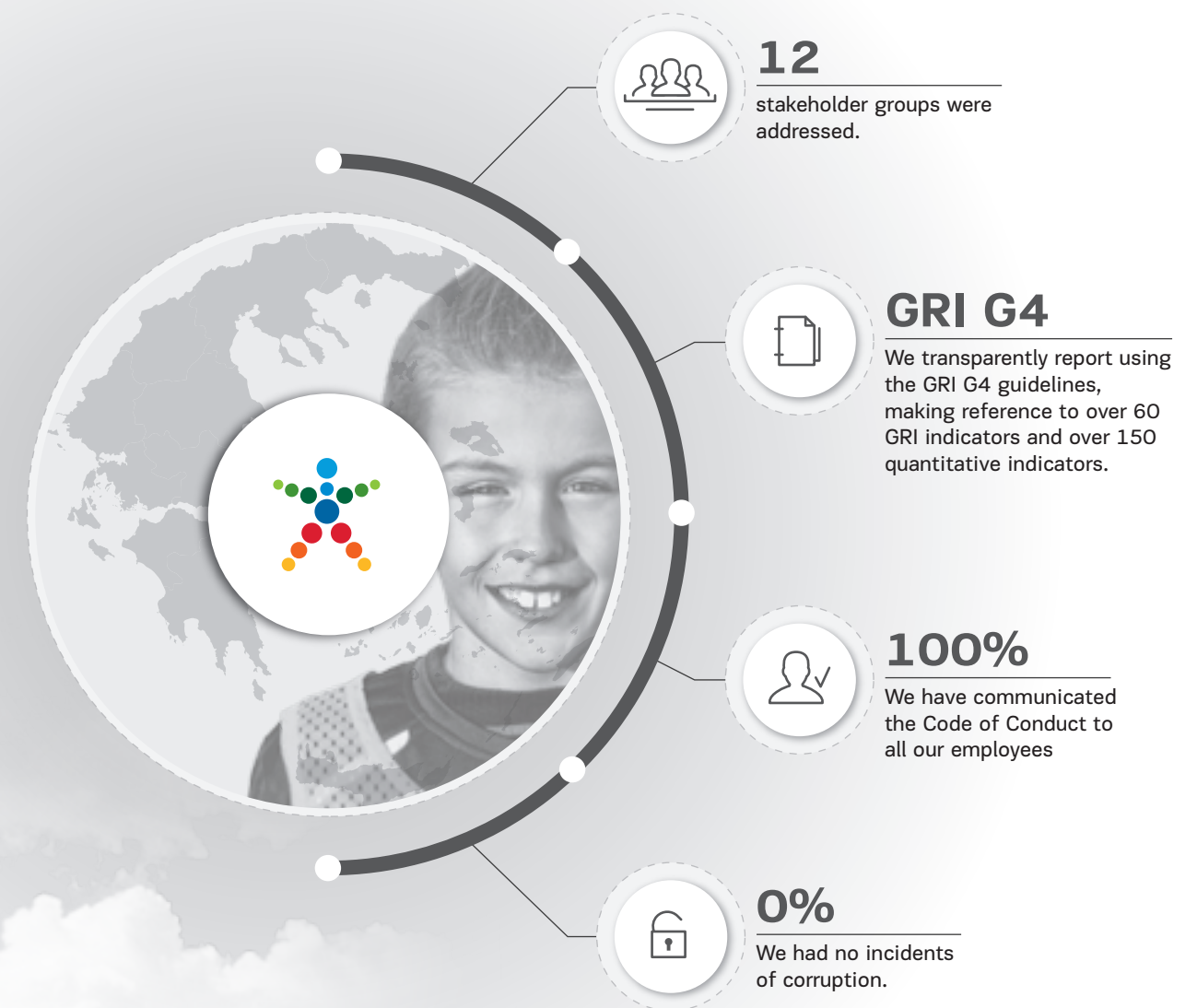


B. At a glance

Who we are

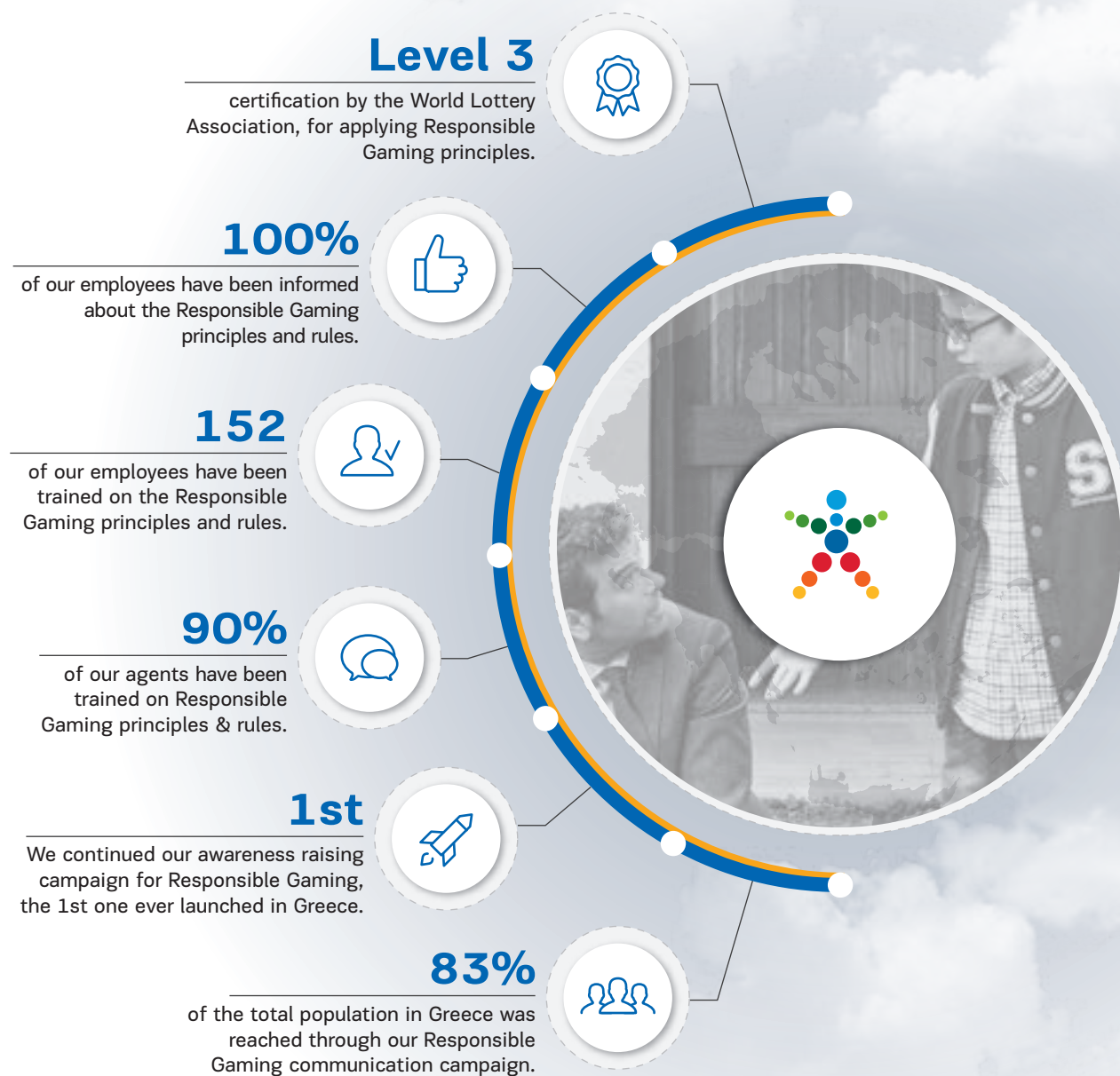


Operating Responsibly Internally

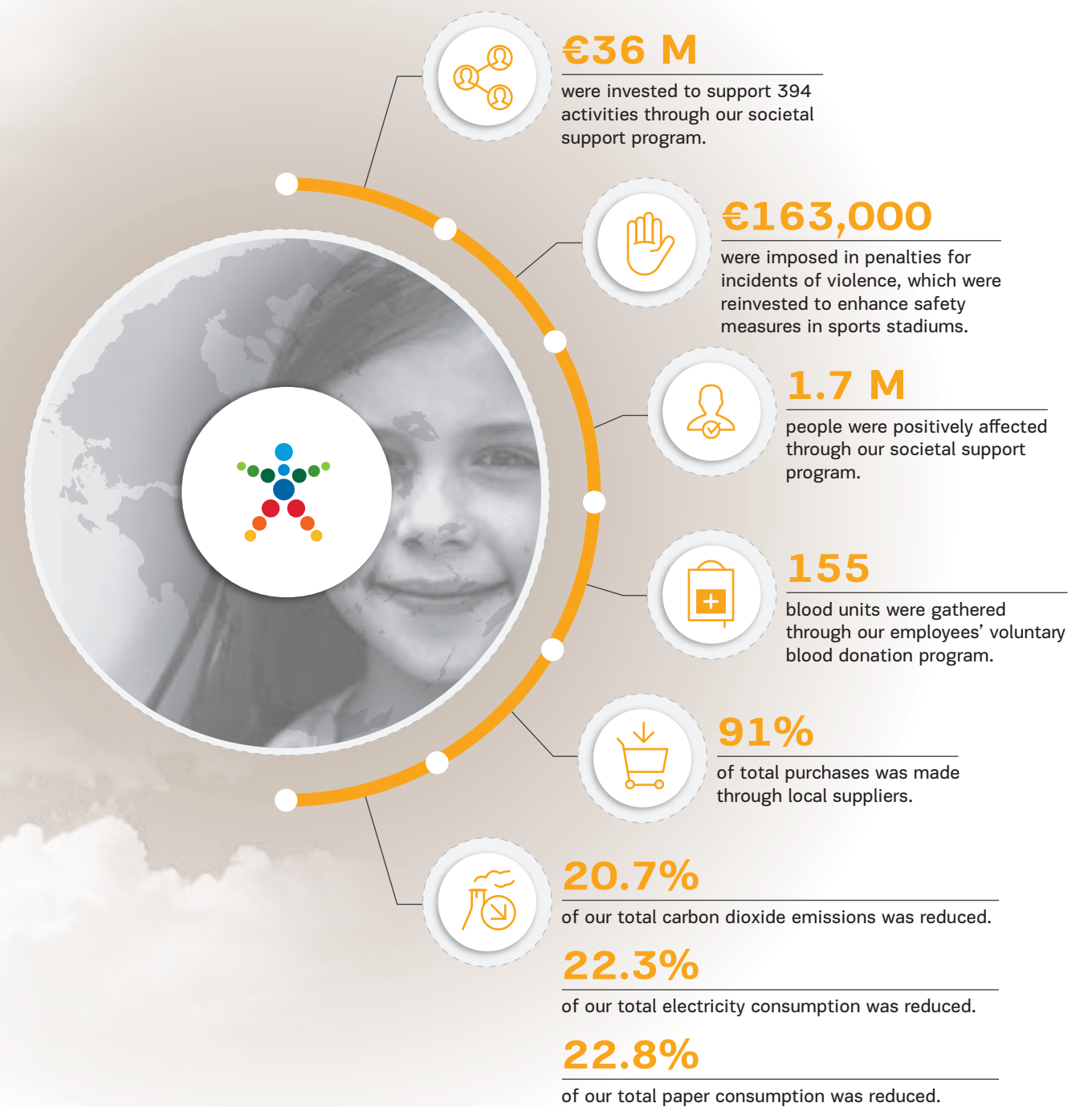


B. At a glance

Protecting our players

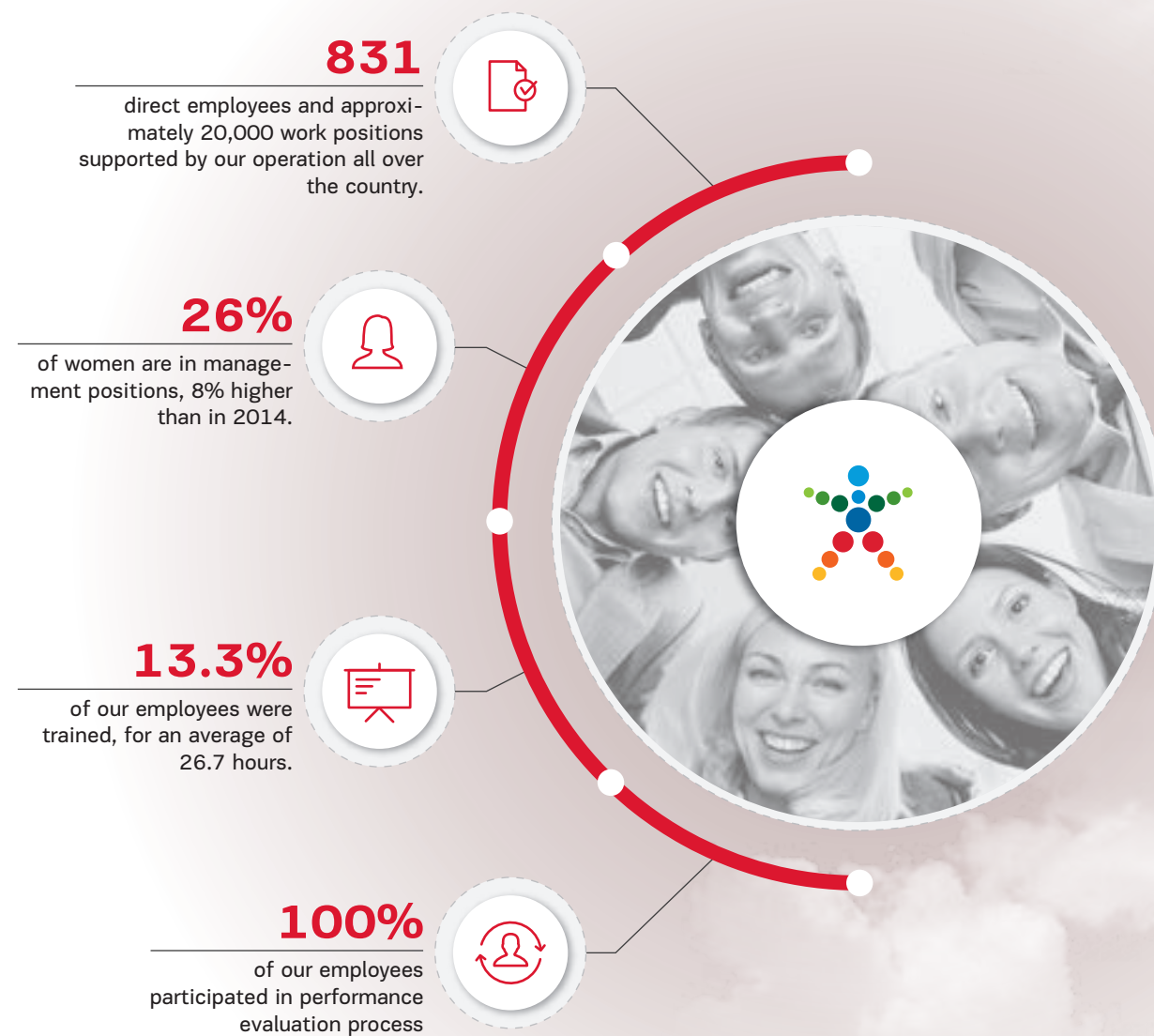


Supporting our Society

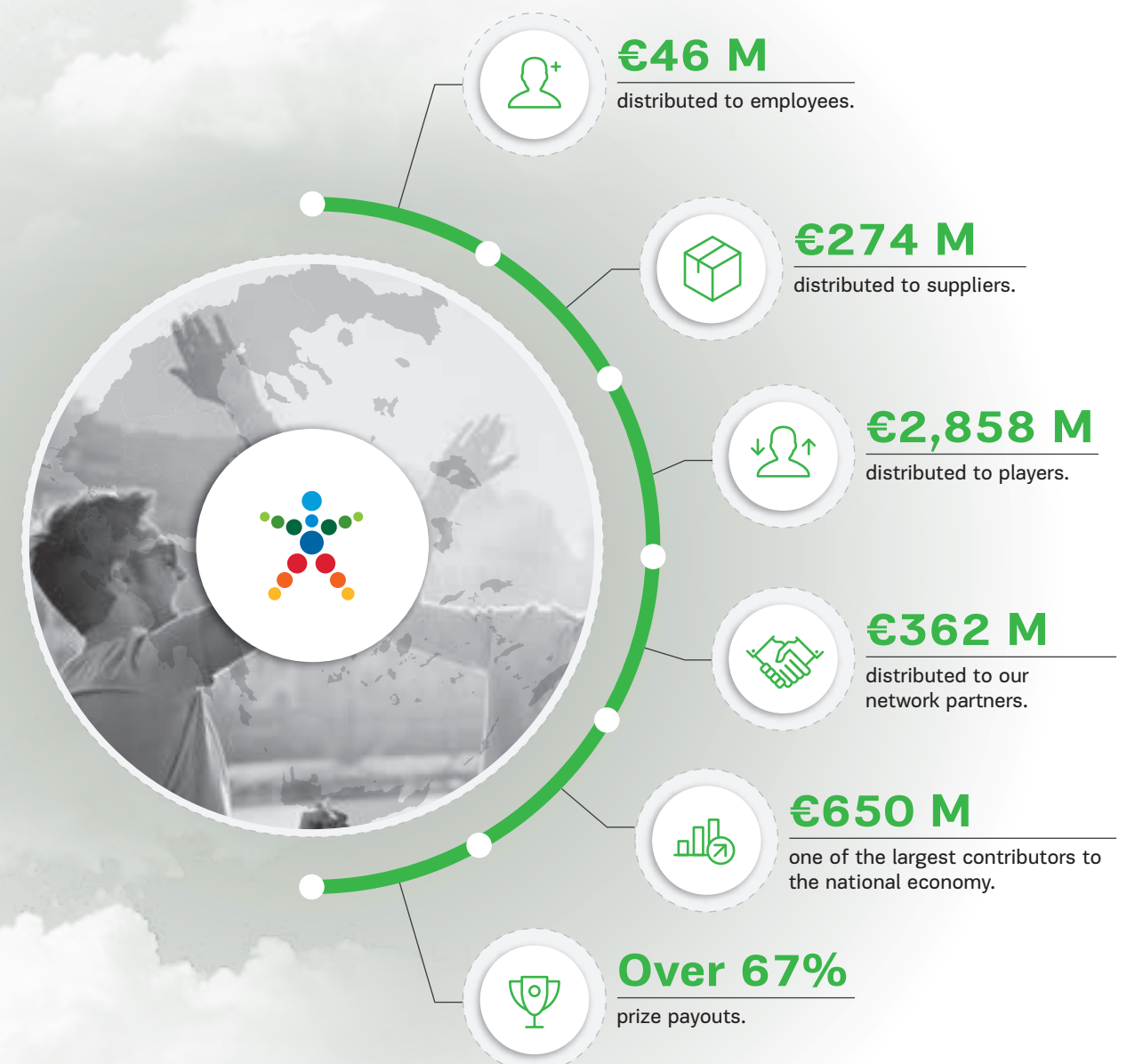


B. At a glance

Caring about our employees



Achieving Financial Results



C. Who we are

We are the exclusive operator for numerical lottery and sports betting games in Greece and an industry leader in Responsible Gaming and Corporate Responsibility.



C. Who we are

About OPAP

Our Company

OPAP, the leading gaming company in Greece and the exclusive operator of all Numerical Lotteries, Sports Betting games and Horseracing Mutual betting, was established in 1958 and listed on the Athens Exchange in 2001.

Through a joint venture, OPAP is also the exclusive operator of the State Lotteries and Instant Win Games (Scratch) and also holds the exclusive license to operate Video Lotteries Terminals (“VLTs”) in Greece.

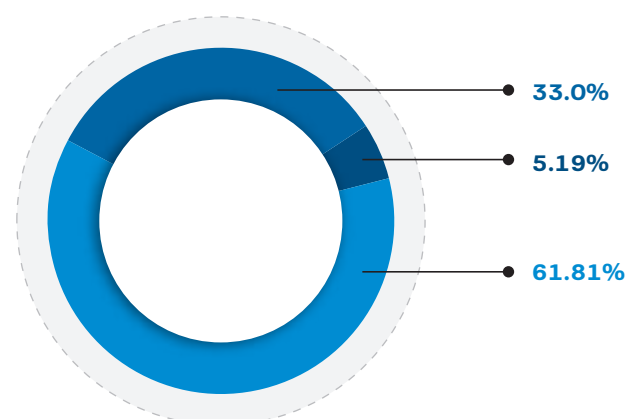
OPAP Group of Companies includes the parent company OPAP S.A. and its subsidiaries. This is the organizational structure of OPAP Group of Companies.

COMPANY	HOLDING	HEAD QUARTERS	MAIN ACTIVITY
OPAP S.A.	Parent Company	Greece	Numerical Lotteries & Sports Betting games
OPAP Cyprus LTD	100%	Cyprus	Numerical Lotteries
OPAP Sports LTD	100%	Cyprus	Sports Betting games
OPAP International LTD	100%	Cyprus	Holding company, Services
OPAP Services S.A.	100%	Greece	Sports events, Promotions, Services
OPAP Investment LTD	100%	Cyprus	Holding company, Services
Hellenic Lotteries S.A.	67%	Greece	Lotteries
Payzone Hellas S.A.	100%	Greece	Payment Services
Horse Races S.A.	100%	Greece	Horseracing Mutual betting
Neurosoft S.A.	30%	Greece	Provision of Software Services
Glory Technology LTD	20%	Cyprus	Provision of Software Services

Shareholder structure

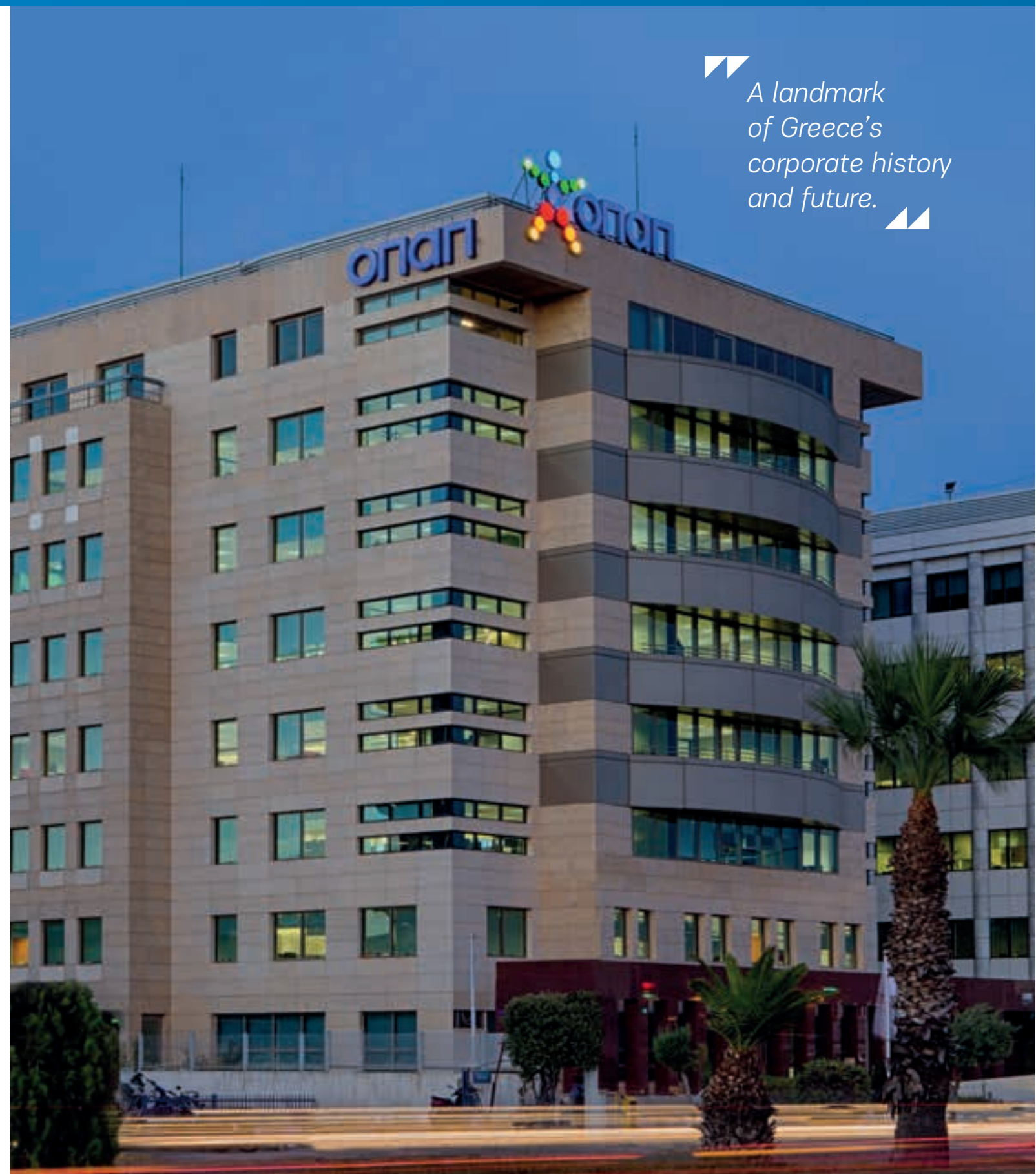
This is OPAP's shareholder structure:

● Remaining free float ● Emma Delta Hellenic Holdings Ltd ● Baupost Group L.L.C.



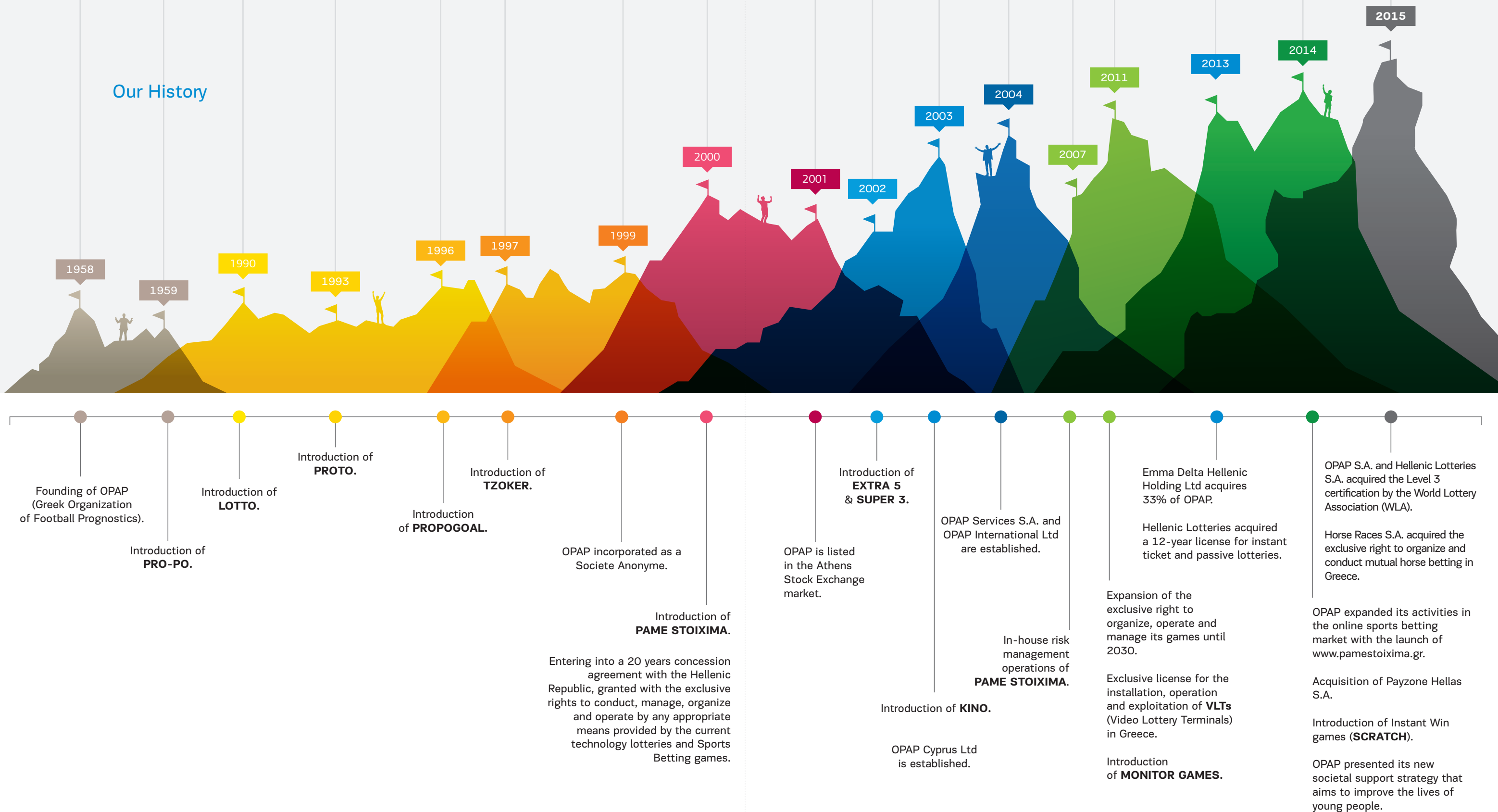
*Data refer to 31/12/2015

A landmark
of Greece's
corporate history
and future.



C. Who we are

Our History



C. Who we are

Our Vision, Mission, Values and Principles

The importance of responsible operation has been incorporated as an integral part in our corporate culture, expressed through our vision, values, principles and mission.

Our Vision

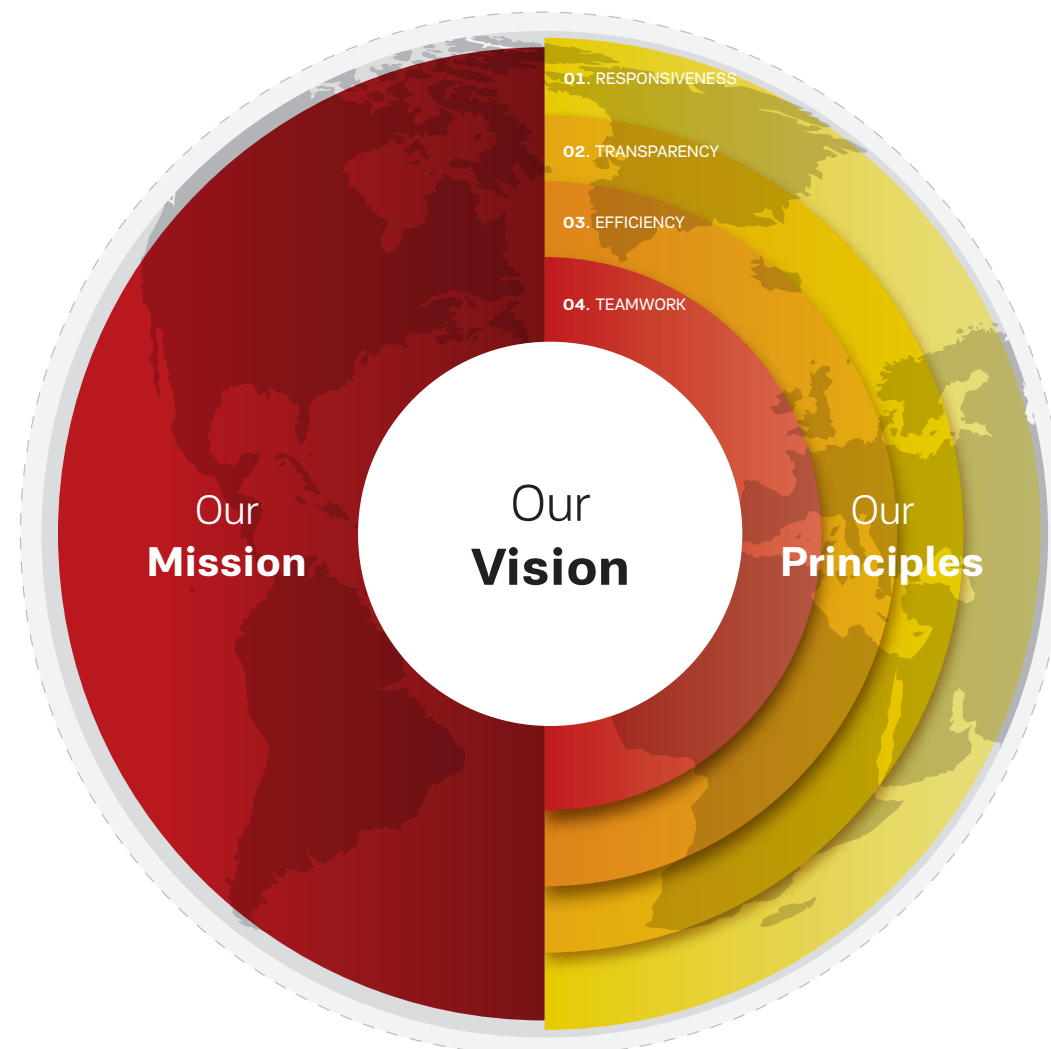
To become a model corporate entity in the Greek market, by entertaining our players in a responsible way, rewarding our stakeholders and improving the lives of people in our communities.

Our Mission

- Be a Best in Class Company
- Be a role-model of efficiency
- Be an agent of social contribution

Our Principles

- 01. **RESPONSIVENESS**
- 02. **TRANSPARENCY**
- 03. **EFFICIENCY**
- 04. **TEAMWORK**



01. 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.

02. 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.

03. INNOVATION

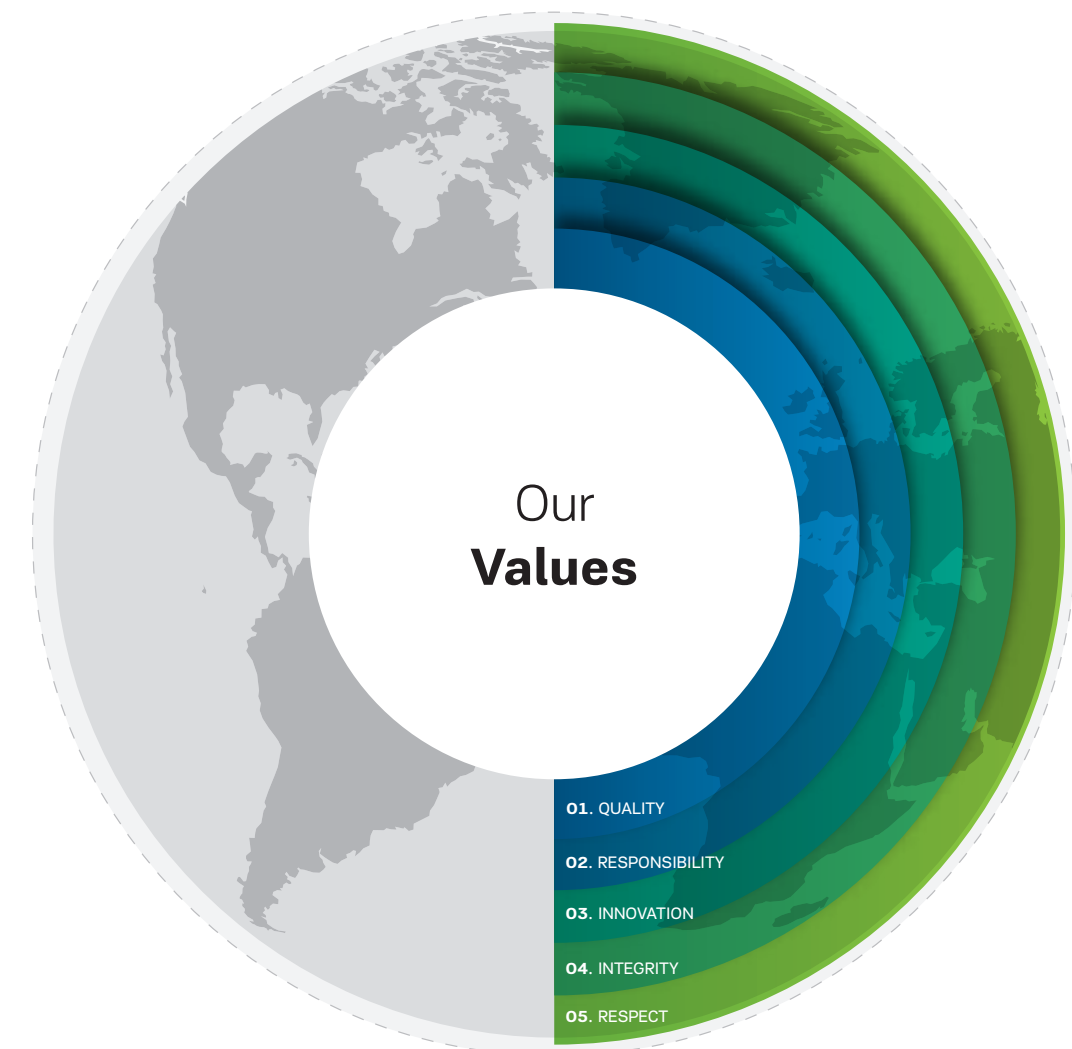
Innovation is the basis of our success and it is a competitive advantage, which allows us to meet the needs of our customers, to create opportunities and to define the future of our business.

04. INTEGRITY

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

05. 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.



C. Who we are

Our memberships in national & international organizations

We are members of the following national and international organisations:

Organizations

- World Lottery Association (WLA)
- European Lotteries Association (EL)
- Hellenic Federation of Enterprises
- Hellenic Network for Corporate Social Responsibility
- Global Lottery Monitoring System (GLMS)

Committees

- World Lottery Security and Risk Management Committee
- European Lotteries Public Affairs Coordination Committee (ELPAC)
- European Lotteries Sport Committee (EL Sport)
- European Lotteries Public Order & Security Committee

Our efforts are recognized

We continuously strive to maximize our performance and even though awards and recognitions don't drive our efforts, they constitute a significant honor especially originating from well-respected institutions. In 2015, we were proud to receive:

- The TRUE LEADERS award in ICAP Group's "TRUE LEADERS 2015", for simultaneously meeting four measurable and objective criteria, based on our published financial results.
- The first place among the top 50 companies in Greece in Direction Business Network's "Protagonists of the Greek Economy", for presenting the highest cumulative profits before taxes in 2010-2014.
- A recognition of our participation in the Eu-

ropean week of Sport #Be Active, an initiative of the European Commission to promote sport and physical activity across Europe, by the Ministry of Culture and Sports, General Secretariat of Sports.

- An honorable distinction in the "33rd Authentic Marathon's Award Ceremony", organized by the Hellenic Athletics Federation (SEGAS), for our "Route of Contribution" initiative.

- The Best App award in the "Social Responsibility" category during the "InfoCom Mobile World & Apps Awards 2015" conference's Mobile & Apps Awards, for the mobile application "Route of Contribution".

- 3 awards in the "Social Media Awards 2015", two of which in the "Mobile App" and "Mobile Campaign" categories, for the mobile application "Route of Contribution".

- 3 awards in the "Mobile Excellence Awards 2015" in the "Entertainment & Events Mobile Applications", "Tool or Utility Application for Smartphone / Tablet" and "Mobile Advertising Campaign" categories, for the mobile applications "Route of Contribution" and OPAPP.

- 2 awards in the "e-volution Awards 2015" in the "Mobile Apps" and "Multi-channel commerce" categories, for the mobile application OPAPP.

- 13 awards in the Ermis Awards 2015, one of which was an Ermis Integrated Campaign award.

We continuously strive to maximize our performance.



C. Who we are

2. About our industry

The Gaming sector

Similarly to the practices followed in most European gaming sectors, the Greek gaming sector is regulated and controlled by an independent administrative authority, the Hellenic Gaming Commission (HGC), and comprises of the following three main sub-sectors:

- Lottery (OPAP and Hellenic Lotteries).
- Casinos (includes all games played within casinos).
- Betting (mainly sports betting, but includes also horseracing betting).

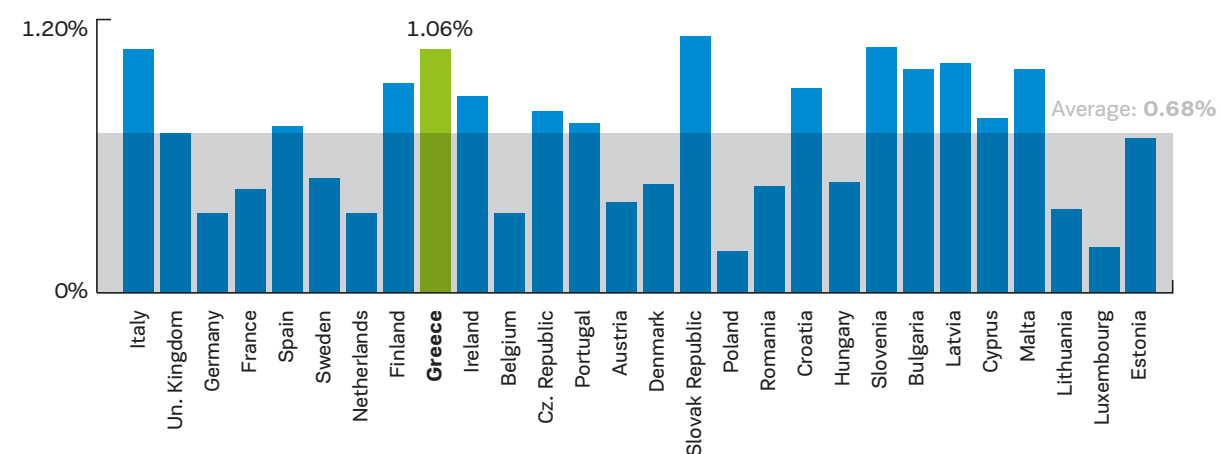
Greece retains its gaming rank amongst European countries, demonstrating resilient year-on-year performance. In 2015, Gross Gaming Revenues (GGR - revenues minus prize payouts to lottery and betting winners) from regulated operators was estimated to be approximately €1.83 billion.

In terms of Gross Domestic Product, the Greek gaming sector accounted for 1.06% of GDP for the year ended December 31, 2015.

This brings Greece at the 4th place in Europe, according to the H2GC, the leading source of data regarding the global gambling industry.

Gross Gaming Revenues as % of GDP (all 28 EU countries)

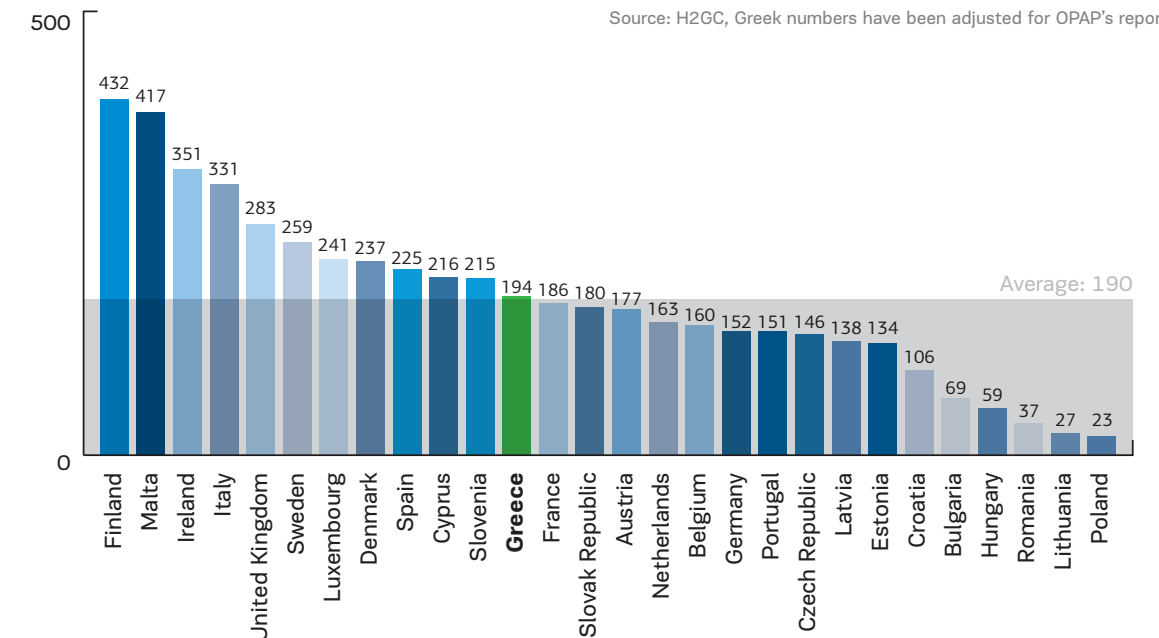
Source: H2GC, Greek numbers have been adjusted for OPAP's reported figures



The per adult gaming expenditure in Greece stands marginally above the average of the EU Countries at €194 per annum (with an estimated adult population of 9.5 million), according to H2GC, revised for 2015 OPAP reported figures.

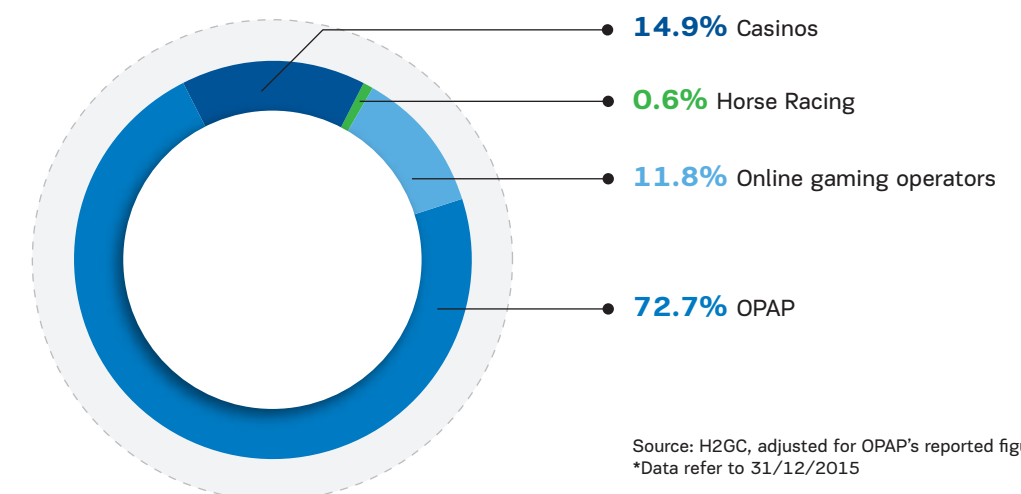
GGR in Europe per Adult 2015 (€)

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



Gross Gaming Revenues in the Greek Gaming Sector

According to H2GC's numbers for Greece in 2015 (revised for OPAP's actual figures), OPAP held a 72.7% GGR share due mainly to the success of KINO, Scratch tickets and the incorporation of passive lotteries. The Greek casino sector, which consists of 9 licensed casinos, generates 14.9% of the total sector's Gross Gaming Revenue.



C. Who we are

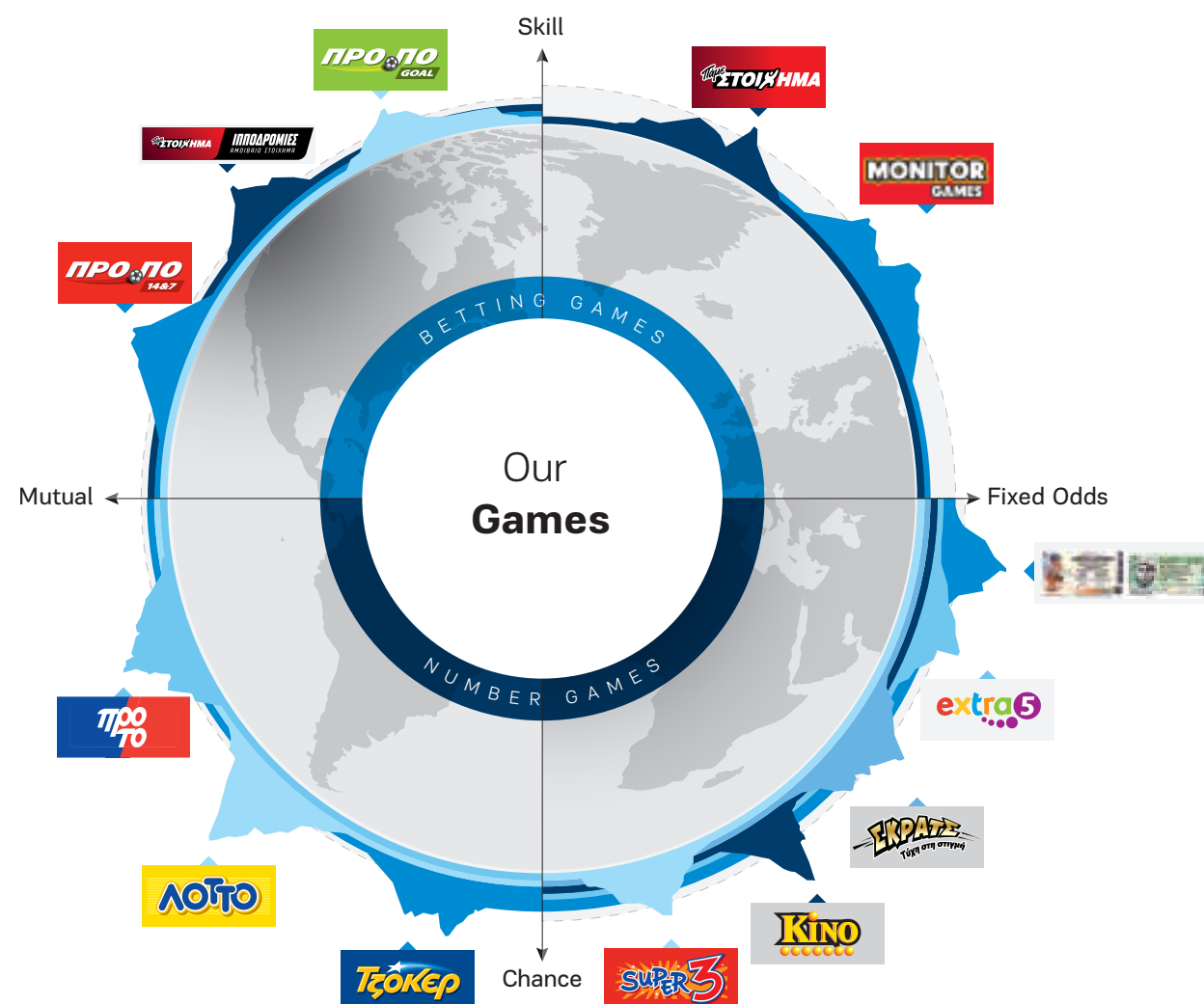
3. About our Products & Services

Our products and services

Being the leading company in the Greek gaming sector with the largest retail network, OPAP efficiently offers its products to customers. The main orientation of the company is to improve and develop its games portfolio, as it strengthens its presence in the gaming

industry and ensures that OPAP meets the needs and protects the interests of its customers in the best possible way and, at the same time, supports and creates value for the communities it operates in.

The company's products by category are the following:



SPORTS & BETTING GAMES

PROPO	PROPOGOAL	PAME STOIXIMA	PAME STOIXIMA HORCE RACING	MONITOR GAMES
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NUMERIC GAMES

LOTTO	TZOKEP	KINO
PROTO	EXTRA 5	SUPER 3

INSTANT GAMES

SCRATCH

PASSIVE LOTTERIES

LAIKO (POPULAR)	ETHNIKO (NATIONAL)	KRATIKO
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GAMING MACHINES (not yet operational)

VIDEO LOTTERY TERMINALS (VLT's)

* The schematic positions our games in terms of fixed odds to mutual odds, as well as requiring more skills to relying more on chance.

In 2000, OPAP entered a 20-year concession agreement, with the Hellenic Republic, according to which the company has been granted the exclusive right to conduct, manage, organize and operate, by any appropriate means relevant to the current technology, numeric, sport forecasting and betting games.

The agreement was extended with the Addendum concluded in November 2011 and is valid till October 12, 2030 except for PAME STOIXIMA and MONITOR GAMES, for which OPAP has exclusive right to offer them online until October 12, 2020. Under the terms of the concession agreement and in accordance with the terms of Article 27, paragraph 9a of Law no. 2843/2000, OPAP was also granted with the exclusive right to operate and manage any new sport betting games in Greece, as well as it reserves the right of first refusal of the right to operate and manage any new game, in case the law allows the conduct of this game. Additionally, since 2011, OPAP holds an exclusive license to install and operate 35,000 Video Lottery Terminals (VLTs) in Greece for a total cost of €560 million (the exclusive license will be valid for 10 years). Of the 35,000 VLTs licensed, 16,500 will be installed and operated

by OPAP in a network of gaming halls to be utilized exclusively for VLTs operations, while the remaining 18,500 will be put up for a public international tender to be installed and run by sub-concessionaires. The project is suspended since July 2015.

In 2014, OPAP Investment Limited, subsidiary of OPAP S.A., was announced as the provisional successful bidder in the international public tender conducted by the Hellenic Republic Assets Development Fund (HRADF), for the exclusive right to organize and conduct mutual betting on horse races in Greece for 20 years. The transaction has been approved by the Court of Auditors and within 2015 was also approved by the competition authorities. After completing all terms and conditions provided on the April 24, 2015 Accession Agreement between Hellas Horse Races S.A. and HRADF, including the certification of the agreement and its appendices from the Greek Parliament, the company holds as of 8th January 2016, the exclusive right to organize and conduct terrestrial and online mutual horseracing betting in Greece for 20 and for 5 years respectively, with its operations being scheduled to commence in January 2016.

C. Who we are

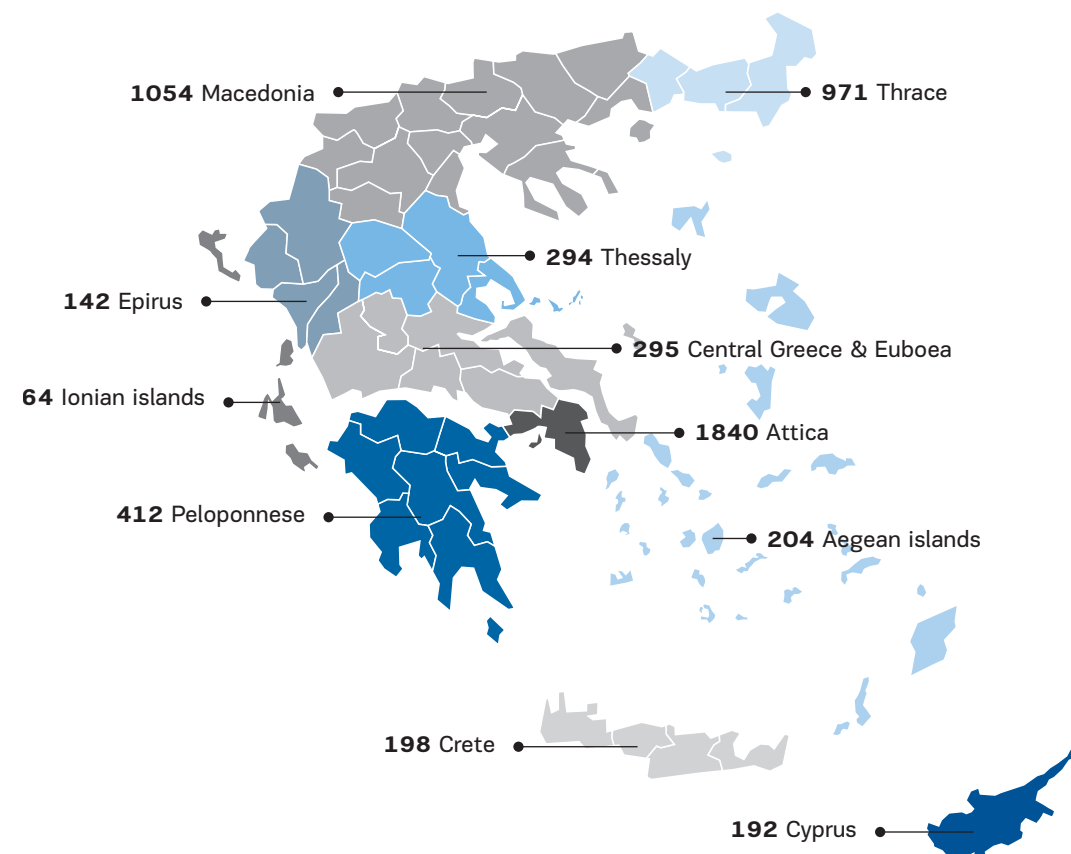
Our Value Chain

We operate one of the largest retail networks in Greece and Cyprus

Our distribution network is one of the largest exclusive commercial networks in Greece, which in recent years has been subject to major efforts to upgrade its image, improve its functionality and enhance its infrastructure.

We offer the games we operate and the services we provide through 1 owned store, 4,599 dedicated and branded agent branches throughout Greece and 192 in Cyprus, while there are also 5,752 points of sales and street vendors for the distribution of Scratch tickets and passive lotteries.

The map shows approximately the geographical distribution of our agencies.



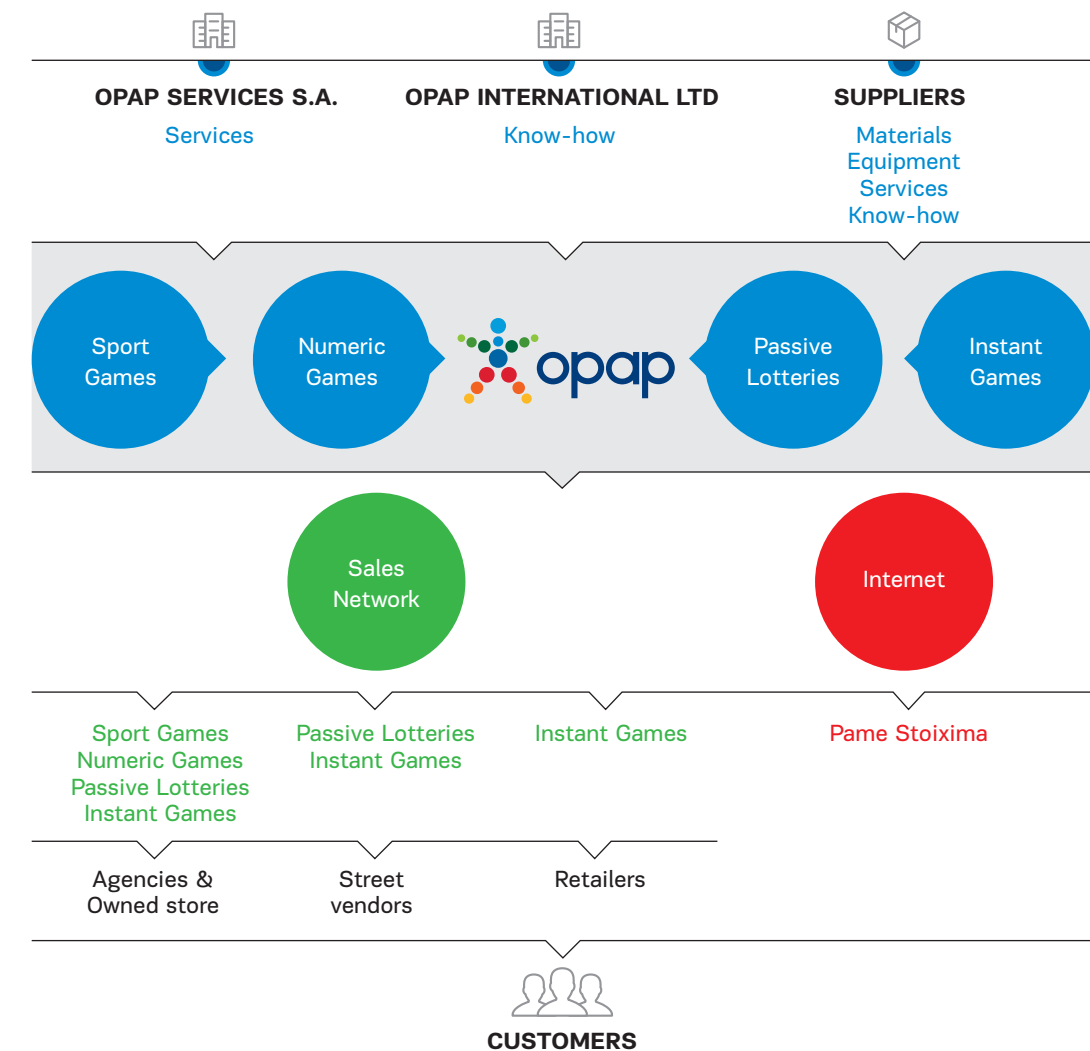
*Data refer to 31/12/2015

For our operation, we utilize resources from OPAP Services S.A. and OPAP International LTD (services and know-how) and other suppliers (for materials, equipment and miscellaneous services), which are used to organize, operate and conduct our games of chance.

All our products and services are available through our sales network, which includes our

corporate store and OPAP agencies (where we also provide the necessary equipment, IT systems and services such as training), as well as street vendors and other various retailers (for selling scratch tickets and passive lotteries).

Especially for the PAME STOIXIMA, players can also place their bets through a specially designed online platform (www.pamestoixima.gr).



1. CORPORATE RESPONSIBILITY
2. MATERIAL ISSUES & STAKEHOLDER ENGAGEMENT
3. CORPORATE GOVERNANCE & COMPLIANCE

I. Operating Responsibly Internally

Our Philosophy

We are convinced it is imperative to develop our business, while being mindful of social consequences, since a responsible approach is the only way to ensure consistent value creation for both internal and external stakeholders.


Therefore, it is vital for us to enhance our corporate reputation, build trustworthy relationship with different stakeholders and at the same time, make a positive difference in the communities where we operate.

Our Objective

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

Our Priorities

- We utilize appropriate Organizational Structures
- We operate based on Management Systems
- We identify areas of focus
- We identify material issues
- We interact with our stakeholders
- We focus on quantitative results
- We embed responsibility into the way we operate
- We operate a BoD according to Hellenic Corporate Governance Code Principles
- We operate a number of committees
- We apply Internal Controls and Risk Management Systems



*“We incorporate
responsibility
in our daily
operations.”*

I. Operating Responsibly Internally

1. Corporate Responsibility

Your Opinion...

Responsible Behavior

According to a survey conducted to a total of 313 citizens in November-December 2015, out of the **71%** of participants that believe that companies should act in a socially responsible way, **19%** do not buy products or services from companies that do not act in a socially responsible way and **52%** do not consider it as a driver for purchasing products or services by itself.

Your Opinion...

Perceived Image

According to a survey conducted to a total of 313 citizens in November-December 2015, **70%** of participants believe that OPAP is a "contemporary company, reflecting the trends", **59%** believe that OPAP is a "company with good reputation" and **51%** believe that OPAP is a "reliable company".

We utilize appropriate Organizational Structures

As a result of its major shift in its Corporate Responsibility philosophy within 2014, OPAP now adopts a more holistic approach to Corporate Responsibility, rather than solely focusing on donations, sponsorships and financial support.

Consequently, the accountability for responsible operation lies within each department and each employee within our company, without being solely the responsibility of a specific department. Nevertheless, managing responsible operation issues overall, requires creation of appropriate organizational structures, data collection for performance evaluation and presentation to our Stakeholders.

- At Board level, our Corporate Responsibility agenda is driven by the Chairman of the

Board, while at organizational level the Chief Marketing Officer is responsible to identify the strategic risks, set standards and targets and review performance regarding Corporate Responsibility.

- The Chief Marketing Officer is supported by the Head of Corporate Responsibility Department, who at operational level, cooperates with other departments in order to diffuse responsibilities, policies and practices, and has established a close collaboration with the Quality Systems Management Department.

- At the same time, we have appointed specific executives, responsible for key issues such as Compliance, who coordinate and implement relevant programs and activities.

LEVEL	Corporate Responsibility Management	
BOARD OF DIRECTORS	Chairman of the Board	Compliance Manager
ORGANIZATIONAL	Chief Marketing Officer	Chief Financial Officer (IMS)
OPERATIONAL	Head of Corporate Social Responsibility Department	Quality Systems Management Department

We operate based on Management Systems

OPAP S.A. and its subsidiary OPAP Services S.A. have implemented an Integrated Management System (IMS) in accordance with international standards, where each of the three sub-systems take the structure and the requirements of other systems into account, which facilitates effective monitoring and continuous improvement. Within the context of IMS, we use the following systems, certified by the following International Certification Associations:

- ISO 9001:2008 Quality Management System, certified by Lloyd's Register Quality.
- ISO 14001:2004 Environmental Management System, certified by Bureau Veritas.

- ISO 14001:2004 Environmental Management System, certified by Bureau Veritas.
- SA 8000:2008 Social Accountability System, certified by Bureau Veritas.

We identify areas of focus

Corporate Responsibility at OPAP is allocated at five main areas, as derived through an internal analysis and dialogue with our stakeholders, which compose our Corporate Responsibility framework.

We use this Framework to systematically organize and manage all Corporate Responsibility issues, as well as to avoid focusing on programs and activities, not related to the nature of our business.

Corporate Responsibility Framework



I. Operating Responsibly Internally

2. Material Issues & Stakeholder Engagement

We identify material issues

In each one of the areas of Corporate Responsibility, we recognize the Material Aspects, as a result of a respective four-phase process to identify those aspects we should focus on in a systematic way:

Phase 01

In the Sustainability Context phase, potential aspects were identified by reviewing future trends and current global industry practices, developing a pool of over 80 aspects to be considered.

Phase 02

In the Materiality Analysis phase, these aspects were analyzed in terms of associated Risk (relevant to economic, environmental and social impacts), creating a pool of 36 main aspects to be considered, based on:

- The potential significance of each aspect on our stakeholders.

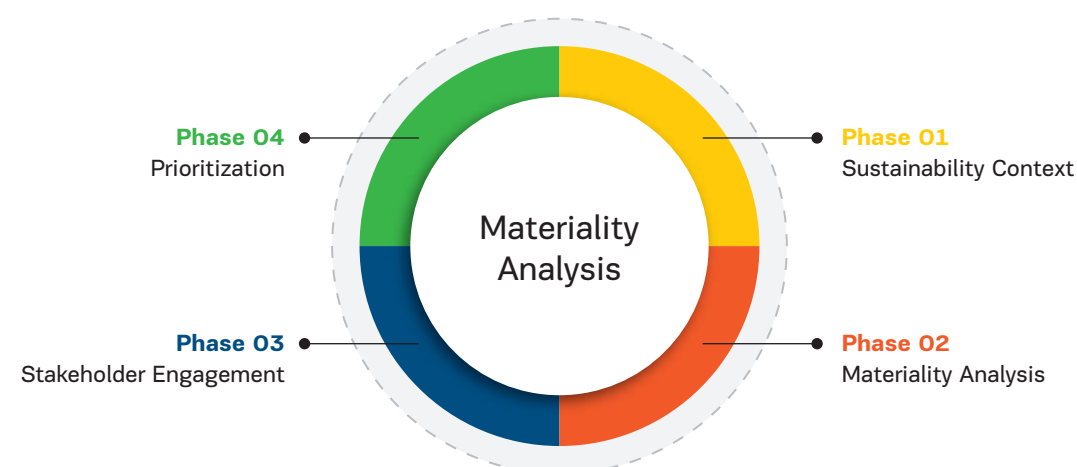
- The potential likelihood of each aspect occurring.

Phase 03

In the Stakeholder Engagement phase, stakeholders' expressed expectations were utilized, where available, through taking into consideration stakeholder engagement input, from various sources, in a non-exhaustive way.

Phase 04

In the Prioritization phase, the outcomes of the above phases were combined in terms of Risk and Expectations, the outcome of which defines, the main aspects OPAP should focus on.



Corporate Responsibility Materiality Analysis



I. Operating Responsibly Internally

We interact with our Stakeholders

We define stakeholders as anyone who influences or is influenced by our operations. For this reason, we define these groups and conduct a systematic and regular dialogue with them, as a decisive factor in our effort to correspond to needs and expectations of society.

*We address 12
Stakeholder groups*

Stakeholder Categories



The table describes our stakeholders groups, methods we apply to establish an open dialogue with them, topics raised by them (which are related to Corporate Responsibility), as well as respective sections of this

Report, where our related programs and answers to these topics can be found. This dialogue is applied throughout the year, without distinct activities taking place as part of the Report preparation process:

Stakeholder Engagement

STAKEHOLDER	METHODS OF INTERACTION	MAIN ISSUES OF INTEREST	RESPONSE WITHIN THE REPORT
Regulatory Bodies (e.g. Hellenic Gaming Commission)	<ul style="list-style-type: none"> Meetings Presentations Reports Recommendations Correspondence 	<ul style="list-style-type: none"> Risk Management and Compliance (incl. applicable legal and regulatory framework) Responsible Gaming Responsible Communication (incl. compliance with Commercial Communication Regulation) Products and Services Labeling Customer Privacy Economic Transparency 	Internal Operation: I-2 Player Protection: II-1, 2 Financial Results: V-1, 2
Players	<ul style="list-style-type: none"> Surveys Points of Sales Social media Call center Awareness campaigns Websites (corporate, product and Responsible Gaming) Press Releases Articles / Interviews 	<ul style="list-style-type: none"> Responsible Gaming Responsible Communication (incl. compliance with Commercial Communication Regulation) Customer Privacy Customer Satisfaction 	Player Protection: II-1-3
Network (Agents, Street Vendors, Retailers)	<ul style="list-style-type: none"> Meetings Presentations Trainings Awareness campaigns Social media Sales portal Call center Responsible Gaming material Product communication material 	<ul style="list-style-type: none"> Responsible Gaming Responsible Communication (in compliance with Commercial Communication Regulation) Customer Privacy Customer Satisfaction Economic Transparency 	Player Protection: II-1-3 Financial Results: V-2
Suppliers	<ul style="list-style-type: none"> Supplier evaluation (annually) Meetings Personal communication Press releases Articles / Interviews Social media Call center 	<ul style="list-style-type: none"> Supplier Assessment for Labor Practices Operational Support Responsible Buying Economic Transparency 	Society Support: III-2 Financial Results: V-1, 2
Industry Associations (e.g. European Lottery Association, World Lottery Association)	<ul style="list-style-type: none"> Written commitment Meetings Formal communication 	<ul style="list-style-type: none"> Anti-Competitive Behavior Anti-Competitive Compliance Responsible Gaming Responsible Communication (in compliance with Commercial Communication Regulation) Customer Privacy 	Player Protection: II-1, 2

I. Operating Responsibly Internally

STAKEHOLDER	METHODS OF INTERACTION	MAIN ISSUES OF INTEREST	RESPONSE WITHIN THE REPORT
Employees	<ul style="list-style-type: none"> Employee engagement survey (Annually) Intranet Corporate & social events Internal awareness campaigns Internal communication Trainings/Seminars Performance Appraisal (Annually) 	<ul style="list-style-type: none"> Code Compliance Work Positions Employee Benefits Training & Development Health and Safety Equality and Fairness Child Labor Forced Labor Labor Association Labor Practices Grievances Employee Satisfaction 	Internal Operation: I-2 Employee Care: IV-1-3
State	<ul style="list-style-type: none"> Attendance in organizations and associations Discussion with representatives at national & local level 	<ul style="list-style-type: none"> Corporate Responsibility Corporate Governance Public Involvement Anti-Corruption Anti-Competitive Behavior Anti-Competitive Compliance Responsible Gaming Responsible Communication (in compliance with Commercial Communication Regulation) Economic Transparency 	Internal Operation: I-1, 2 Player Protection: II-1, 2 Financial Results: V-1, 2
Local Communities	<ul style="list-style-type: none"> Meetings Written communication Local events 	<ul style="list-style-type: none"> Society Support Donation and Sponsorship Environmental Compliance 	Society Support: III-1, 3
Citizens	<ul style="list-style-type: none"> Surveys (annually) Call center Press releases Articles / Interviews Social media Websites (corporate, product & Responsible Gaming) Communication campaigns 	<ul style="list-style-type: none"> Responsible Gaming Responsible Communication (in compliance with Commercial Communication Regulation) Customer Satisfaction Society Support Donation & Sponsorship 	Player Protection: II-1-3 Society Support: III-1
Organizations (e.g. NGOs, Institutions, Academic Authorities, Treatment Providers)	<ul style="list-style-type: none"> Meetings Collaborations Surveys Websites (corporate, product and Responsible Gaming) Social media Written communication 	<ul style="list-style-type: none"> Corporate Responsibility Anti-Corruption Public Involvement Responsible Gaming Responsible Communication (incl. compliance with Commercial Communication Regulation) Society Support Donation and Sponsoring Energy Use CO2 Emissions Material Consumption Waste Handling Water Consumption Equality and Fairness 	Internal Operation: I-1, 2 Player Protection: II-1, 2 Society Support: III-1, 3 Employee Care: IV-2
Media	<ul style="list-style-type: none"> Press releases Interviews / Articles Websites (corporate, product and Responsible Gaming) Press conferences Special events Meetings 	<ul style="list-style-type: none"> All 	Internal Operation: I-1-3 Player Protection: II-1-3 Society Support: III-1-3 Employee Care: IV-1-3 Financial Results: V-1-3
Shareholders	<ul style="list-style-type: none"> Annual Reports (annually) Quarter Reports (quarterly) Websites (corporate, product and Responsible Gaming) Road shows Press releases Meetings 	<ul style="list-style-type: none"> All 	Internal Operation: I-1-3 Player Protection: II-1-3 Society Support: III-1-3 Employee Care: IV-1-3 Financial Results: V-1-3

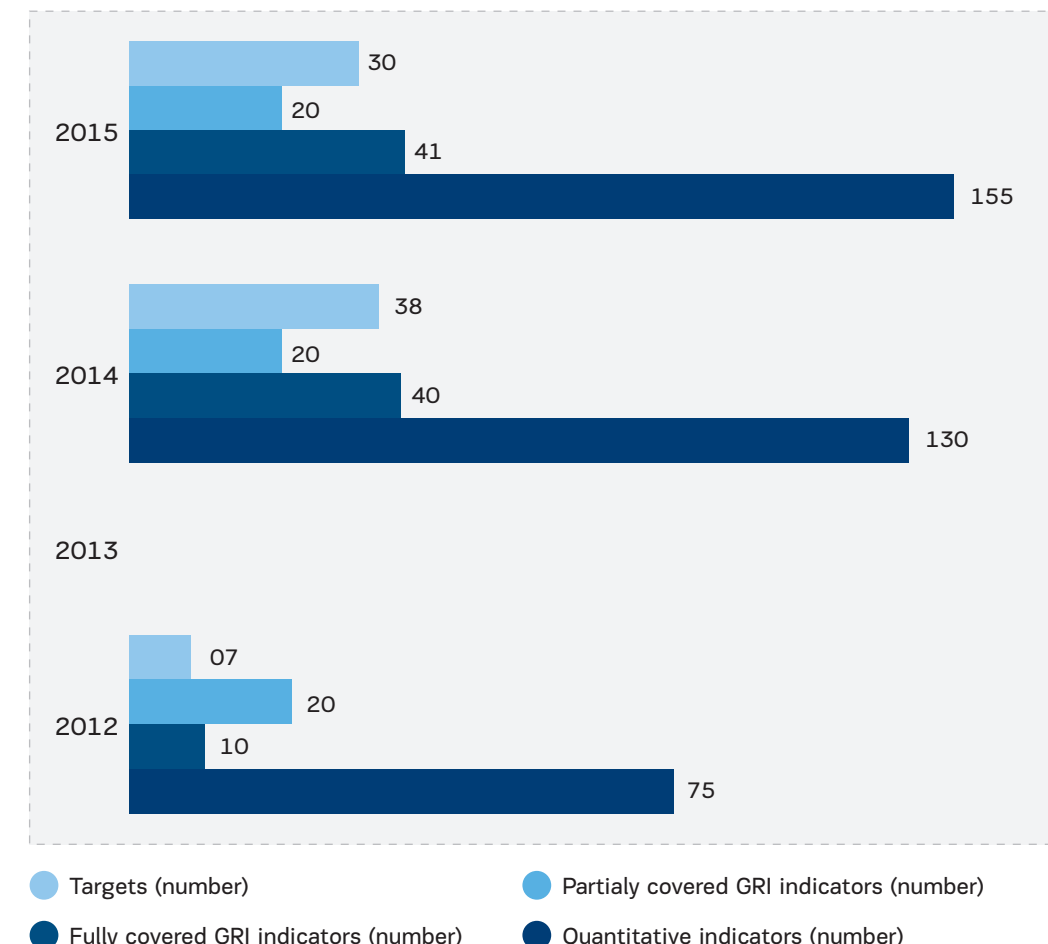
We focus on quantitative results

We aim to continuously present our activities and operations with qualitative and quantitative objectives and data (general indicators, as well as GRI indicators) within the Report.

These objectives and indicators are used to evaluate our performance internally and can be also used by the stakeholders to review our performance.

We transparently report using the GRI G4 guidelines, making reference to over 60 GRI indicators and over 150 quantitative indicators

Quantitative Data within the Report



I. Operating Responsibly Internally

3. Corporate Governance & Compliance

We embed responsibility into our way of operating

Code of Conduct

In 2015, the Board of Directors approved OPAP's Code of Conduct, which outlines the main company operating principles and employees' behavioural rules, as well as provides guidance to all members (i.e. Board of Directors, Chief Unit Officers, managers and employees) on issues that may arise within OPAP and indicates whom to contact if someone thinks that himself/herself, or another member, may have breached these principles.

portunities, Diversity.

- **Whistle blowing:** Implementation – Violations, Whistle blowing complaints.
- **Ensuring Stakeholders' awareness.**

Good Practice...

Political Contributions

OPAP's Code of Conduct firmly dismisses any payment, commission or donations to any political party or elected officer and strictly prohibits offering of financial or other advantage to any candidate for, or holder of, a position of public office or a political party in all jurisdictions. It must be noted that in 2015, no donations on behalf of our company were made to politicians and political parties.

Good Practice...

Gifts and Donations

Any gifts and donations towards OPAP's employees is subject to the provisions within the Code of Conduct, which strictly prohibits all OPAP's employees to offer, solicit or accept gifts, donations in cash or any other form and any benefit related to their performance and cannot 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.

Employees are only allowed to accept non-cash gifts with an indicative value below €250, which arise out of ordinary and standard business practices.

Good Practice...

Raising Concerns & Whistle blowing

All our employees are obliged to adhere to the principles defined in our Code of Conduct within the scope of their business activities and responsibilities.

If they suspect that the Code and its principles are not followed, employees and Board of Directors/Chief Officers can report their concerns to their immediate manager and Compliance Officer respectively.

In cases where employees, for whatever reason, cannot speak to their immediate manager, they can report their concern anonymously, through the whistle blowing mechanism that has been established, by any of the following means:

- Send an email to whistleblowing@opap.gr.
- Contact the number 2105798193.
- Via a personal hearing.

In any case, the Code protects the confidentiality of anyone who raises concerns, considering as a serious disciplinary offence every attempt to prohibit or deter them from raising such concerns.

Within 2015, there were no reports or complaints raised through the whistle blowing mechanism.

Internal Rules and Regulations

OPAP's Internal Rules & Regulations are prepared in compliance with the provisions of Article 6 of Law no. 3016/2002 as in force and also on the basis of the company's Articles of Association, as in force, and generally in line with the legislative framework applying to the company. Within 2015, OPAP began

the process to revise and replace them by drafting a new version of the Internal Rules & Regulations.

Code of Corporate Governance

We have clearly defined Corporate Governance by adopting the Hellenic Corporate Governance Code, in order to manage our operations, facilitate a common understanding on behalf of our employees, as well as generate added value to all our Stakeholders.

Within 2015, OPAP revised its Corporate Governance Declaration and incorporated it into the 2014 Annual Report, in order to reflect the changes and developments occurred within 2014.

Good Practice...

Political Contributions

We describe Corporate Governance as the way in which OPAP is governed and controlled, with the Hellenic Corporate Governance Code, issued by the Hellenic Council of Corporate Governance (ESED) in October 2013, being adopted by the company in 2014. Corporate Governance:

- Constitutes the structure, through which we set and manage our objectives, determine the methods to achieve them and enables the monitoring of the Management's performance throughout the implementation of the aforementioned elements.

- Establishes standards of governance and best practices, as well as promotes enhanced transparency for all our activities.

- Reflects the policies and procedures we have adopted for achieving good governance practices.

We have communicated our Code of Conduct to 100% of our employees

The Code has been communicated to all employees, who have signed for its acknowledgment and acceptance and that they will adhere to and comply with its guiding principles and provisions on the following issues:

- **Governing principles and company values.**
- **Operational Framework:** Legal and Regulatory compliance, Advertising, Sales promotions and Corporate communication.
- **Personal and business integrity:** Conflicts of interest, Competition law, Social media, Prohibition of play, Money laundering, Fraud, bribery and corruption, Cooperating with Government Investigations, Corporate Responsibility Report, Environment, Health and Safety, Business monitoring and control.
- **The resources of OPAP Group and its customers:** Confidentiality, Insider trading, Intellectual property, OPAP Group assets, Information security, Physical security, Data protection (company data, records and reports), Player services, Player protection, Preventing excessive and underage play.
- **People:** Respect for the individual, Equal op-

I. Operating Responsibly Internally

We operate a BoD according to Hellenic Corporate Governance Code Principles

The Board of Directors (BoD) is the supreme administrative body of the company that mainly formulates the company's strategy and growth policy, supervises and controls its management and administration of corporate affairs and realizes its corporate purpose

- The Board of Directors consists of between seven and thirteen members, with term of office for Board Members being four years. In 2015, the Board of Directors comprised of two Executive Members and ten Non-Executive Members.
- The Chairman of the BoD has also the role of the Chief Executive Officer (dual role). For this reason the Board of Directors has appointed two Non-Executive Vice-Chairmen.
- The 2 Executive Directors are employed by the company or provide services to the latter by performing managerial duties.
- The 10 Non-Executive Members do not perform managerial duties for the company.

BoD Composition

NAME	ROLE	EXECUTIVE MEMBER	INDEPENDENT MEMBER
Kamil Ziegler	Chairman & Chief Executive Officer	✔	✘
Spyros P. Fokas	A' Vice-Chairman	✘	✘
Pavel Horak	B' Vice-Chairman	✘	✘
Michal Houst	Member - CFO	✔	✘
Christos Kopelouzos	Member	✘	✘
Georgios Melisanidis	Member	✘	✘
Marco Sala	Member	✘	✘
Pavel Saroch	Member	✘	✘
Konstantin Yanakov	Member	✘	✘
Rudolf Jurcik	Member	✘	✔
Dimitrakis Potamitis	Member	✘	✔
Igor Rusek	Member	✘	✔

*Data refer to 31/12/2015

However, they may draft independent assessments, especially with respect to the strategy, performance and assets of the company, and may forward them to the Board of Directors and the General Meeting. The number of Non-Executive Members of the Board of Directors cannot be less than 1/3 of the total number of members and, should any fraction arise, it is rounded up to the next integer number.

- The 3 Independent Non-Executive Directors do not have a shareholding in excess of 0.5% of OPAP's share capital and do not have any relationship of dependence on the company or its affiliated entities within the meaning of Article 4(1) of Law no. 3016/2002. The Independent Members may submit reports and other separate statements than those submitted by the Board of Directors to the General Meeting of the company's shareholders, if they so deem necessary.

- Any issues relating to the remuneration paid to the company's top management executives and internal auditors, as well as the overall corporate remuneration policy is set by the Board of Directors and the Remuneration Committee. The fees and any other compensation paid to the Non-Executive Members are defined according to Codified Law no. 2190/1920 and are commensurate with the time they allocate to Board meetings and to discharge the duties assigned to them pursuant to Law no. 3016/2002, as in force each time.

- Initial selection of BoD Members is conducted by the Board Members collectively. The criteria that are taken into account are their professional experience and expertise, while, at the moment, there is no separate consideration of gender and other diversity indicators during their selection.

The company does not set specific targets in absolute percentage terms to deter artificiality in the process; it measures progress year on year to ensure an improving picture on

gender balance which it contributes to the company's growth and success.

- BoD oversees performance related to sustainability issues, through oversight of the Integrated Management System (for quality, environmental and social responsibility management). The BoD appoints a Member to cooperate with the responsible person for the company's Integrated Management System, in order to ensure that the systems are functioning, to promote the awareness of the system requirements to all employees.
- BoD performs a self-assessment on the achievement of the action program drafted within the context of the previous year's Annual Report and the Chairman evaluates each Director's performance through one-to-one discussions with other Directors.

Policy...



Transparency of Shareholders

According to a formal corporate Procedure and the applicable legislation, as well as the Internal Rules and Regulations, all BoD Members and a number of top executive managers have to formally and semiannually inform OPAP's BoD, regarding their participation in other companies as a Shareholder of over 10% (direct or indirect) and other business and professional activities that may lead to potential conflicts of interest with OPAP S.A. and its subsidiaries.

I. Operating Responsibly Internally

We operate a number of Committees

The Board of Directors is supported by a number of Committees associated with responsible operation, such as the:

Audit Committee

The Committee consists of three Independent Non-Executive Members and is established for the primary purpose to assist the BoD in fulfilling its oversight responsibilities for the financial reporting process, the system of internal control, the internal audit performance, the external auditor's appointment, remuneration and independence and OPAP's process for monitoring the risk management system, compliance with laws and regulations and implementing the Code of Conduct.

Management Systems Committees

The Committees oversee all activities in relation to the company's management systems (ISO9001, ISO14001, SA8000) and:

- Establish OPAP's policy and substantiate corporate policies as required by management systems.
- Decide on any corrective and preventive actions pertaining to the management systems.
- Recommend improvement actions to the Board of the company.
- Secure the adequate resources (materials and services) for the effective implementation of management systems.

It consists of the following members, with possible participation of advisors to support the Management Systems Department, without voting rights.

Management Systems Committees

POSITION	ROLE	QUALITY MANAGEMENT COMMITTEE	ENVIRONMENT & SOCIAL ACCOUNTABILITY COMMITTEE
Executive Director of BoD	Chairman / Top Management representative on Management Systems	✓	✓
Procurement & Quality Director	Member / Management Systems Representative	✓	✓
Organosis Director	Member	✓	✗
Infrastructure & Operations Director	Member	✓	✗
CRM Director	Member	✓	✗
Customer Service Director	Member	✓	✗
Human Resources Director	Member	✗	✓
Facilities Director	Member	✗	✓
Security Director	Member	✗	✓
Head of Corporate Social Responsibility Department	Member	✗	✓
Northern Greece Responsible	Member	✓	✓

Remuneration Committee

The Committee consists of a Non-Executive Member as the Chairman and the two Non-Executive BoD's Vice-Chairmen as members and decides the remuneration and benefits policy to attract, retain and motivate executive directors and senior management, as well as major remuneration plans for OPAP S.A. and its subsidiaries as a whole, while presenting relevant proposals to the BoD.

The Committee is empowered to recommend granting of share options under the existing share option plans and considers the appropriate balance between fixed and variable remuneration and between short and long-term variable components of remuneration.

General and Specific Agent Issues

The Committee consists of an Executive Member, 5 Non-Executive Members and one representative of the Agents.

The main responsibility of the Committee is to evaluate issues related to agents' operations (license transfers, relocations, license removals etc.)

POSITION	ROLE
Executive Director of BoD	Chairman
Chief Sales Officer	Member
OPAP Stores Director	Member
Lawyer	Member
Sales Operation Director	Member
Sales Support Manager	Member
Representative of Agents	Member

We apply Internal Controls and Risk Management Systems

System of Internal Controls

We maintain a system of internal controls, in order to safeguard our assets, as well as detect and address major risks, which includes:

- The Audit Committee.
- The Internal Audit, which is an assurance and consulting activity designed to ensure compliance with policies and procedures, in order to add value, improve the company's operational effectiveness and help to accomplish its objectives, being responsible to:
 - Establish a systematic and disciplined approach to evaluate the effectiveness of risk management, control and governance processes.
 - Recommend appropriate measures to improve their efficiency and effectiveness.
 - Monitor the implementation of corrective actions.
- The Security and Corporate Risks Management Division, which consists of the Department of Physical Division, the VLTs-HL Security Division and the Department of Anti-Fraud, to determine and develop security policies, corporate risk management system, as well as monitor their implementation.

• The Compliance Office, which monitors and ensures compliance with the applicable legal and regulatory framework governing the company and the operation of its games, as well as the Internal Rules and Regulations, procedures and Code of Conduct.

• The Quality Systems Management Department, to plan, control and ensure the implementation of the integrated management system applied by the company in accordance to the requirements of International Standards. Based on the procedure we have established,

I. Operating Responsibly Internally

all of our departments are audited at least once per year, with possible unscheduled audits conducted, based on the department's status, importance and results of previous audits, through which:

- We review the effective implementation of the Integrated Management System.
- We determine the compliance with the ISO 9001:2008, ISO 14001:2004 and SA 8000:2008 Standards.

The outcomes of internal audits are:

- The Audit Reports, which are presented by the IMS Manager to OPAP's management team and record all findings and observations, including the nonconformities and the areas for improvement.
- The Audit Nonconformity Reports, which record cases of nonconformity and weaknesses in the IMS, along with the corrective action, the employee responsible to implement the required correction and the respective deadline.
- The Improvement Action Lists, which record the necessary corrective actions.

Following the results from 13 internal and external audits conducted within 2015:

- All findings were taken into consideration and the appropriate departments and functions decided upon the design and implementation of corrective measures.
- Remedial actions were completed for more than 54% of total open audit findings.

Risk Management

We follow a comprehensive annual enterprise wide approach to identify, measure and prioritize key risks that may affect the smooth opera-

tion and the achievement of the company's strategic objectives. OPAP's BoD monitors the risk level through the major risk assessment process, which is facilitated by the Internal Audit with the cooperation of the Risk Unit, prior being presented to the Audit Committee and submitted to the BoD.

The risk registry incorporates elements of the Internal Controls - Integrated framework (COSO model 2013) and includes risk categories such as:

- **Strategic External:** Customer Wants, Technological Innovation, Stakeholder Expectations, Sovereign-Country-Political, Legal, Regulatory, Competition, Industry, Financial Markets, Catastrophic Loss-Natural hazard, Third Party Problems, External Fraud, Labour Market, Corruption, Channels Availability.
- **Strategic Internal Governance:** Environmental Scan, Business Model / Planning / Strategy, Product Lifecycle, Business Portfolio, Acquisitions & Partnerships, Organizational Structure, Risk Management, Code of Conduct, Ethics & Values, Board Effectiveness, Succession Planning.
- **Strategic Sustainability:** Reputation, Image & Branding, Shareholders Value, Stakeholder Relations.

Within 2015

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

Achievements 2015 and Objectives 2016

WE SAID	PROGRESS	WE WILL	BY
Re-structure our Integrated Management System	100% <div></div>	Upgrade our Integrated Management System in compliance with new versions of ISO standards	2018
		Recertify OPAP S.A. and OPAP Services S.A. according to ISO 9001:2008, ISO 14001:2004 and SA 8000:2008 standards	2016
Train employees on Integrated Management System	25% <div></div>	Train 70% of employees on Integrated Management System	2016
Revise our Corporate Governance Declaration	100% <div></div>		
Revise our Internal Rules and Regulations	50% <div></div>	Finalize and approve the revised Internal Rules and Regulations	2016
Issue our Code of Conduct acknowledged by all OPAP BoD members, employees and suppliers	75% <div></div>		
Apply a Comprehensive Risk Reporting procedure to the Audit Committee and the BoD	0% <div></div>		

II. Protecting our players

Our Philosophy

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

In this frame, we create and offer the best products and services to players, by adopting the highest standards of integrity and responsibility.

Our Objective

We aim to provide entertainment and fun through our games of chance, exclusively to adults, while protecting players and society in general from compulsive gaming.

Our Priorities

- We operate within the regulatory framework
- We are monitored by an Audit Committee
- We follow fair competition rules
- We cooperate with investigation authorities
- We monitor illegal gaming
- We follow the principles and practices of Responsible Gaming
- We ensure reliability and transparency of products and services
- We deploy Responsible Gaming within our operations
- We educate players to play responsibly
- We advertise our products with responsibility
- We provide information to players
- We ensure protection of personal data
- We seek to satisfy our customers' needs



“We ensure responsible use of our products and services by our customers.”

1. RESPONSIBLE GAMING

2. RESPONSIBLE ADVERTISEMENT
3. CUSTOMER SATISFACTION

II. Protecting our players

1. Responsible Gaming

We operate within the regulatory framework

The Hellenic Republic has adopted a framework for the gaming sector, which enables extensive public control.

As a result, the Hellenic Gaming Commission (HGC) was formally established in 2012 as an independent administrative authority, responsible for the regulation, supervision and control of games of chance offered within the Greek Territory.

The objectives of HGC are to establish the regulatory framework and set the standards, which aim to ensure that gaming and betting are organized and conducted in a transparent and fair manner and are not subject to illegal activities or exploitation, as well as protect the interests of players and society (especially vulnerable groups and minors).

The regulatory activities of HGC are conducted within a series of regulations that either refer to the overall gaming sector (horizontal regulations such as the Decision no. 129/2/7.11.2014, as currently in force following announcement occurred with decisions 155/6/24.4.2015, 163/6/9.7.2015, 166/5/23.7.2015 in accordance to the provisions of Law no. 3691/2008, as amended by Law no. 3932/2011, concerning tackling money laundering and terrorism financing), or relate to specific games or gaming category, or its processes by their respective operators.

We are monitored by an Audit Committee

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

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

- Compliance with the terms of the Gaming Concession, the VLTs License and the gaming legislation.
- Protection of consumers against excessive participation and crime related to games of chance.
- Protection of minors and other vulnerable groups.
- Reliability of games and players' winnings.
- Protection of personal data.
- Payment of taxes and participation of the Hellenic Republic.

OPAP's BoD (or the people to whom the relevant decision making authority have been delegated to) should provide any relevant recommendations, decisions or other documents prior to any decision being taken to the Committee, regarding the aforementioned topics.

- OPAP is obligated to refrain from adopting any decision or entering into a contract for which the Committee has expressed in written its reasoned disagreement.

- In case the Committee considers that OPAP does not comply with its contractual obligations towards the Hellenic Republic or existing legislation, it immediately informs the Hellenic Gaming Commission in order to assume proper corrective measures.

We follow fair competition rules

The gaming regulated market in Greece consists of the following 12 operators, licensed by the Hellenic Republic: OPAP S.A., Hellenic Lotteries S.A., Horse Races S.A. and nine casinos.

In 2011, through the provision of Article 50, paragraph 12 of Law no. 4002/2011 and via a procedure that lasted from 14 December 2011 until 31 December 2011, 24 betting companies, which have been operating illegally in Greece, have entered into a transitory regime allowing their operation, subject to compliance with the obligation to pay GGR tax, until the process for future licensing would be launched to interest parties, without violating OPAP's legal rights.

Following a long legal procedure, in 2014 the Plenary of the Hellenic Council of State issued two decisions that it is unquestionably considered that OPAP's exclusive right to organize games is totally aligned with European Union's laws and regulations, decisions that are irrevocable and no appeal can be raised against them before a National or EU Court.

The Council of State based its judgment on the indisputable fact that the Greek regulatory framework governing the conduct of OPAP S.A. games is particularly strict and consistent, due to the enhanced regulatory and audit mechanisms of the independent gaming Commission, as well as the substantial restrictions that have been established to effectively tackle relevant crime, illegal money trading and protect vulnerable groups from irrational participation in the games of chance.

It must be noted that in 2015, as far as OPAP S.A. is aware, no antitrust complaint based on Articles 101 and 102 TFEU against OPAP S.A. or other legal action based on Articles 101 and 102 TFEU (or the national law equivalents) was notified to OPAP S.A. and no relative fines or sanctions were imposed.

We cooperate with investigation authorities

Good Practice...



Tackling Money Laundering and Terrorism Financing

OPAP is fully compliant with the Hellenic Gaming Commission's decision 129/2/2014, as currently in force, which introduced measures to prevent money laundering and terrorist financing by participants in the gaming and betting sector.

As the decision mandates, OPAP S.A. and Hellenic Lotteries S.A. issue a winning certificate after the submission of a relevant request.

The provisions applicable to the payment of winnings were amended following the imposition of capital controls, explicitly stating that payments of gross profits before taxes that exceed €1,500 per playslip, are only made through credit or payment institutions established and operating legally in Greece

II. Protecting our players

or in another Member State of the European Union or of the European Economic Area. In this case, players are required to verify their identity by demonstrating their ID card or a valid passport or other document proving their identity.

Payments for gross profits before taxes between €200 and €1,500 per playslip, can be paid, after the player's request, either through credit or payment institutions or with cash through an OPAP agent.

In 2015, the Board of Directors approved the Policy on the "Prevention of the use of gaming products for the purpose of money laundering and terrorism financing" (Anti Money Laundering - AML Policy) for OPAP S.A. and Hellenic Lotteries S.A., which is mandatory for all employees, agents and salesmen of OPAP products. The Policy describes a set of principles and procedures to minimize the risk of using OPAP's products for money laundering and terrorism financing, structured around the following areas:

1. Introduction

Purpose, Regulatory and Statutory Framework, Compliance with the Policy, Policy Governance, Annual Evaluation of AML Policy, Internal Notifications of the Policy

2. AML Compliance Officer

Appointment, Duties, Reporting, Independence and Accessibility

3. Internal Procedures

Risk Based Approach, Know your Customer (KYC), Payments of Profit

4. Monitoring and Reporting

General, Suspicious or Unusual Transactions, Monitoring

5. Reporting of Suspicious or Unusual Transactions

Dispatch of Reports to the Hellenic Financial Intelligence Unit (HFIU), Reported Players, Reported Cases, Internal Reporting, Protection of Reporting Persons

6. Record Keeping

7. Audits

8. Employee & OPAP's Network Training

As mandated by the Policy, the AML Compliance Officer, who is appointed by the Board of Directors and notified to the Hellenic Gaming Commission, is responsible to continuously assess the risks arising from existing and new players, as well as existing or new services, and recommend to the Board of Directors the adoption of measures and/or additions and/or changes to OPAP's systems and procedures, in order to effectively mitigate those risks. The Board of Directors also receives and assesses a semi-annual Report with the audits conducted and the weaknesses found, the number of reports for Suspicious and Unusual Transactions submitted, the number and content of the respective trainings implemented, as well as the measures taken and procedures applied to prevent money laundering and terrorism financing.

AML/CTF Trainings

We provide training courses for our employees and agents on Anti-Money Laundering/Counter-Terrorism Financing issues, in order to ensure that they are familiar with them and fully understand the repercussions for non-adhering with the AML Policy.

Within this context, we implement the following categories of training courses:

- In-house training and presentations to agents by the AML Compliance Officer.
- Hands-on training.

- Regular communication and reminders on the AML Policy.

Additionally, we inform and notify our employees and agents in case there are changes in the regulatory framework and issue written instructions regarding handling of certain cases.

Within 2015

- The AML Compliance Officer participated in relevant training courses and conferences.
- We conducted trainings to employees in our Agents Care Department, in order to assist in the AML checking of winning certificates requests.
- We conducted trainings on the applicable AML legal and regulatory framework to agents, focusing on their relevant obligations.

Good Practice...



Investigating Gaming Revenues

OPAP submitted to the Hellenic Gaming Commission, as instructed, all the relevant information for 2010-2014 gaming certificates, which included:

- Full details of all those who requested winning certificates, along with the amount of each certificate (amount played and amount won) and the issued date.

- The winning tickets included in each certificate, with the individual amount per ticket.

- The time, place and agency (with the agent's full details), where the tickets were played, with the individual amount per ticket.

The Hellenic Gaming Commission forwarded the above material to the Anti-Money Laundering, Counter-Terrorist Financing and Source of Funds Investigation Authority, as well as the Financial and Economic Crime Unit, in order to proceed with investigations within their jurisdiction. Similar information for previous years will also be sent to the competent authorities.

We monitor illegal gaming

The company has an established internal and external mechanism for advice on ethical and responsible behavior of players and reporting of illegal gaming sites.

- The line for reporting illegal gaming sites is 2109239920 (daily 9:00-17:00) and 6970000462 (24hrs) and the respective email address is paranomostixima@opap.gr.

- The illegal gaming team reports daily and monthly to OPAP management the cases of illegal gaming sites and fraudster third parties who were identified and convicted.

In 2015, there were 856 actions, which led to 5,974 arrests of individuals and 8,609 confiscations of illegal gaming equipment, compared to 829 actions, 4,833 arrests of individuals and 7,885 confiscations in 2014.

II. Protecting our players

We follow the principles and practices of Responsible Gaming

Good Practice...



International Certification for Responsible Gaming

In 2015, OPAP S.A. and Hellenic Lotteries S.A. acquired the Level 3 certification – with Level 4 being the highest – by the World Lottery Association (WLA) for the application of the principles of Responsible Gaming into their daily operations.

WLA is a member-based organization which aims to uphold the highest ethical standards of Responsible Gaming, upon the core values of responsibility, integrity, professionalism, innovation and creativity. The members of WLA are expected to actively commit to the principles of Responsible Gaming under the relevant certification, with the evaluation of each member being conducted by an independent team of experts. The certification demonstrates how successful Responsible Gaming programs and initiatives are applied, in relation to the benefit and interests of all Stakeholders.

It must be noted that although OPAP S.A. and Hellenic Lotteries S.A. submitted their application for the Level 2 certification, WLA awarded them both with the Level 3 certification, making them the only Greek companies to acquire such a certification.

This constitutes the greatest recognition by WLA for OPAP's consistent planning and implementation of the principles of Respon-

sible Gaming, along with a clear confirmation of its commitment to protect players and the society in general, serving as a model organization in the Greek gaming sector.



Responsible Gaming refers to a series of actions designed to protect and prevent the general public and especially minors and other vulnerable social groups from excessive participation in games of chance. Within this frame, consumers are provided with timely, accurate and sufficient information about the products, terms and conditions of their use, as well as the possible risks and consequences that might arise through participation in games of chance.

OPAP's experience in the gaming industry demonstrates that a Responsible Gaming approach should incorporate and govern all management activities of its business, in order to safeguard the interests of players and the community in general.

We achieved Level 3 certification by the World Lottery Association, for applying Responsible Gaming principles.

Responsible Gaming Framework

The Responsible Gaming framework for both OPAP S.A. and Hellenic Lotteries S.A. reflects the one adopted by the World Lottery Association (WLA) and consists of the following elements:



II. Protecting our players

1. Research

Understand Responsible Gaming and the problems related to excessive playing through implementing gaming-related researches, disseminating relevant information and integrating Responsible Gaming principles into its daily operations.

2. Employees

Provide information and training to all employees regarding Responsible Gaming principles, as well as ensure that Responsible Gaming is an integral part of their daily operations.

3. Sales Agents

Educate and support its retail network to comply with Responsible Gaming regulatory framework and the company's principles and rules.

4. Game Design

Offer socially responsible products, incorporate Responsible Gaming principles in the design phase of new games and evaluate the social impact of its games.

5. Player Education

Undertake awareness and informational campaigns about the potential risks connected to games of chance, moderate and balanced game behavior as well as the importance of protecting minors.

6. Remote Gaming Channels

Comply with Responsible Gaming objectives for all online gaming products, enlarge player base, limit expenditure and impose industry leading age control and product access standards.

7. Advertising and Marketing

Develop and apply a self-regulation code, in addition to applicable legislation on advertising games to ensure appropriate and transparent communication.

8. Treatment Referral

Support help services and help lines for players and their families who face problems related to gaming.

9. Report and Measure

Create annual report on the commitments undertaken, the activities carried out and the results achieved related to Responsible Gaming.

10. Stakeholder Engagement

Develop strong working relationships with key Stakeholders in order to exchange information and improve all elements of Responsible Gaming.

Policy...

Responsible Gaming Policy

Within 2015, the Board of Directors approved the new Responsible Gaming Policy for OPAP S.A. and Hellenic Lotteries S.A., which reinforces its commitment to undertake all necessary measures to minimize the potential negative impact from participation in games of chance. The Policy addresses 3 main target groups:

- Players.
- Employees.
- Agents/Points of Sales and their employees.

In order to support its Responsible Gaming strategy, OPAP and Hellenic Lotteries have launched the following distinct policies within their overall Responsible Gaming Policy:

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

We ensure reliability and transparency of products and services

Reliability and transparency in relation to the operation of our games and provision of services are ensured by several security measures designed to protect our information technology system from breaches in security, such as illegal retrieval and illegal storage of data and accidental or intentional destruction of data.

Our security measures cover our data processing system, our software applications, the integrity and availability of data and the operation of our online network.

Security mechanisms (online & offline)

Our information system ensures the integrity of data stored in our terminals and central database, as well as their flow via our network. This is achieved by using a priority security model at terminal, network and central information system level.

This system has the processing capability to announce winners in all winning categories within a very short time frame.

An independent Audit Committee, which is titled "Audit Committee dealing with winners proclamation and objection trials for all games of OPAP S.A.", consisting of 15 regular and 15 alternate members (public servants), is responsible to monitor and verify the integrity and credibility of transactions for all OPAP's games processed by the

Central System, declare winning tickets and evaluate any potential objections (established in accordance with the provision of the Article 27, paragraph 5 of Law no. 2843/2000).

Draw credibility in mechanical lottery machines

Regarding the draw credibility in games that utilize mechanical lottery machines, the following have been established:

- An independent five-member Draw Committee to ensure the reliability of draws in LOTTO, PROTO and JOKER, with its members appointed by the Minister of Culture and Sports.
- A specific Draw Regulation i.e. a Joint Ministerial Decision (no. 7905/24-02-2009 GG B' 430/10-03-2009), which describes all procedures that have to be followed during the relevant draws, as well as all the necessary corrective measures that have to be applied in case of malfunction in one of the mechanical lottery machines.
- Procedures that ensure the uninterrupted operation of all mechanical lottery machines used for the draws, in compliance with all requirements stated by the corresponding manufacturer.
- All draws are open to the public and are broadcasted live from a nationwide TV station.

II. Protecting our players

Draw credibility in random number generators

Regarding the draw credibility in games that utilize random number generators, the following have been established:

- Independent integrated secure cryptographic systems generating random numbers to conduct electronic draws in SUPER 3, EXTRA 5 and KINO games, which are certified on a regular basis by academic, educational or research institutions in Greece and abroad.

- A specific Draw Regulation i.e. a Joint Ministerial Decision (no. 7905/24-02-2009 GG B' 430/10-03-2009), which describes all procedures needed to record the numbers from every electronic draw after they are generated, so as to prohibit data alteration or corruption.

- Electronic draws systems are located in secure areas, protected by special security and access control systems.

It must be noted that in 2015, there were no formal complaints by players regarding credibility of draws.

We deploy Responsible Gaming within our operations



Research

We aim to implement a systematic approach in order to conduct and document research, disseminate information and integrate the

principles of Responsible Gaming into our daily operations.

As we consider it our obligation to contribute to society's understanding of problematic gaming, we go beyond our financial support to independent research organizations and welcome industry dialogue that gives us the opportunity to strive for Responsible Gaming best practices every day.

Good Practice...



Intervention Program

Within 2015, OPAP designed an educational intervention program titled "Youth Power" that addresses pre-teenage children, in collaboration with the Adolescent Health Unit of the "Panagiotis & Aglaia Kyriakou" Pediatric Hospital.

The program utilizes an experiential approach, in order to:

- Inform and educate children on a series of high risk issues such as addictive substances, excessive gaming, alcohol, smoking, risks and dangers on the internet and school bullying.
- Strengthen children's positive thinking.
- Promote healthy life choices.
- Provide the necessary information to protect themselves from the aforementioned risks.
- Sensitize parents and teachers.



Stakeholder Engagement

The importance of building strong working relationships with key Stakeholders is a critical factor in the success of the Responsible Gaming framework for OPAP S.A. and Hellenic Lotteries S.A., in order to promote Responsible Gaming as broadly as possible and encourage a better understanding of the gaming's social impact.

Therefore, apart from collaborating with independent academic institutions, we also form strategic partnerships with the medical community, media, treatment providers and NGOs via one-to-one meetings, collaborations and sponsorships.

Good Practice...



Engaging with Various Stakeholders

Within the context of its Responsible Gaming activities, OPAP presented within 2015 its Responsible Gaming strategy to:

- Hellenic Republic's representatives, in one-to-one meetings of OPAP's Chairman and CEO.

- The Hellenic Gaming Commission and journalists.

Additionally, in 2015, OPAP engaged and collaborated with various Stakeholders, who are directly concerned about Responsible Gaming and include among others:

- The Hellenic Gaming Commission and the three member Audit Committee, as mandated by our operations.

- The World Lottery Association (WLA).

- The European Lottery Association (ELA).

- Media (both TV and print), in order to promote our Responsible Gaming awareness campaign.

- Various academic institutions, such as the National and Kapodestrian University of Athens in order to design and implement a training program for our agents and employees.

Additional activities within 2015

OPAP has supported 11 Responsible Gaming activities, such as:

- The "8th State of the Art Adolescent Medicine Course – Addiction Behaviors in Adolescence Round Table", organized by the Health Adolescent Unit of the "Panagiotis & Aglaia Kyriakou" Pediatric Hospital with 650 participants.
- The "4th International Elife Congress – Prevention and treatment of high-risk online behaviors", organized by the Hellenic Association for the Study of Internet Addiction with 767 participants.

II. Protecting our players



Remote Gaming Channels (online gaming)

We abide by the strictest practices to monitor players' participation in online betting for OPAP S.A.'s games (not applicable for Hellenic Lotteries S.A., as it does not offer any online games), in order to maximize the entertainment offered and, at the same time, protect the players and the society as a whole:

- We utilize https (hypertext transfer protocol secure) as a communications protocol for secure communication over a computer network, which is designed to withstand eavesdropping attacks that can lead to gaining access to players' accounts and sensitive information.
- We include information on game odds in all online game guides.
- We only allow people above 21 years old to register and use our betting website. We request the necessary documentation in order to verify their personal identification data within 30 days (in case personal data are not submitted within 30 days, the player's account closes) by using three different and secure ways of verification:
 1. Visit an OPAP agency and carry their identification documents with them.
 2. Use the players' IBAN number, which is operated by Interbanking Systems S. A. (DIAS S.A.), the national payment system of Greece.
 3. Send a phone or a public utility bill with the player's name on it and can be contacted by any appropriate means (e.g. phone call,

letter, SMS), in order to verify his/her personal information.

- We always verify a player's email address, prior to verifying his/her electronic account.
- We allow only one account per user.
- We only allow people with internet access from within the Greek territory to participate in our betting website.
- We have set a maximum total deposit amount of €800 per player, which no player can exceed before their verification.
- We allow a maximum amount of €1,200 per bet for pre-game betting and €600 for live betting, from all online players.
- We always verify that players have access to their payment account, in order to ensure that money is correctly refunded.
- Players can see their betting activity in detail (e.g. winnings and losses, deposits).
- Players are able to regulate their betting experience in accordance with their wishes and needs, as they can apply limits within which they can participate in our online betting services by setting the maximum amounts that can be deposited per day, week or month or by setting their maximum betting amount per day.
- Players can set their playing limits of their choice.
- In case players request a deposit limit increase, at least 24 hours have to elapse before the relevant request can be implemented. However, in case players request to decrease their deposit or playing limits, this can be done instantly.



Zero data breach

No online breaches and no cases of lost usernames or passwords were reported in 2015.

- Players can choose to take a break from participating in online gaming for a short period of time, such as 24 hours (temporary exclusion period).
- Players can request for a temporary or permanent exclusion from participating in online gaming (temporary exclusion cannot be valid for a period of less than one month and in permanent exclusion players can re-register after their accounts have been closed for one year), with OPAP ensuring that they cannot participate in gaming online after the submission of an exclusion request, by deactivating their accounts.
- We inform players that have excluded themselves from participation about treatment referral.
- Players that are detected with problematic behavior are immediately informed about the self-exclusion and/or the limits setting option.
- We maintain a record of the players who want temporary or permanent exclusion from online participation (players provide an explicit consent to be registered in such records) and do not allow players to register with a new account or connect to the Gaming system, in case they are listed on it.

- We investigate all accounts opened in order to avoid the possibility that players requested for self-exclusion have opened a new account.

- Players can also request to close their electronic account whenever they want, through a specified process.

- We do not send marketing material to players who are temporarily or permanently self-excluded from participating in online gaming.



Employees

We inform and educate our employees about Responsible Gaming, in order to ensure that players and vulnerable groups are constantly protected and ensure their compliance with the principles and rules of Responsible Gaming.

All our employees have received information through a targeted awareness raising campaign, which included specially designed branding in our premises, an employee leaflet and a mouse pad with the basic principles of Responsible Gaming, while employees from the Customer Care Department and Sales Department have already been trained, in order to properly handle calls received from people who are facing problems due to excessive play and instill the main messages of Responsible Gaming to our sales network respectively.

Additionally, within 2015, we:

- Provided regular informative updates regarding Responsible Gaming, as part of our internal communication plans.

II. Protecting our players



100%

of our employees have been informed about the Responsible Gaming principles and rules



152

employees have been trained on the Responsible Gaming principles and rules

- Incorporated employee awareness relevant trainings on Responsible Gaming in our annual Responsible Gaming Action Plan.
- Distributed and informed all our employees (including new hires) about our Responsible Gaming Policy, which is also available in our intranet.
- Trained 152 employees on the Responsible Gaming principles and practices.
- Designed online training courses for our employees across departments in collaboration with the National and Kapodestrian University of Athens, in order to be aware of the Responsible Gaming strategy, priorities and regulatory framework, as well as targeted training sessions addressing specific departments, such as our Contact Center.



Sales Agents

The contractual agreements signed with agents include a number of clauses, which refer to the responsible operation of agents, according to OPAP's Values and Principles.

Indicatively, agents are obliged by the terms of the agreement they have signed with OPAP (article 2, fundamental principles) to comply with "The protection of the Greek society from addiction to games of chance, the protection of minors and the protection of the consumer".

Non-compliance of agents with the basic Responsible Gaming rules constitutes a reason for imposing penalties (ranging from warning, to termination of agency's agreement).

Good Practice...



Minors Protection

In order to prohibit minors from participating in games of chance, all OPAP agencies are obliged to clearly and distinctly place relevant signs at their entrance at all times.

Furthermore, according to OPAP's Responsible Gaming Policy, all employees of OPAP agencies are obliged to follow the established procedure of clients' age identification and require an ID card (or an equivalent document, such as passport or residence permit, clearly showing the date of birth), in case of any doubt.

If the individual is identified to be a minor, agents and their employees must:

- Explicitly prohibit the minor's participation in OPAP's games of chance.
- Point out the adverse consequences that may arise from their participation in games of chance.
- Immediately notify OPAP S.A. of such incident.



90%

of our agents have been trained on Responsible Gaming principles and rules

It must be noted that in 2015, 9 cases of non-compliance on behalf of our agents regarding their responsible operation were reported. All cases were directly addressed and all the relevant sanctions were imposed, including monetary fines.

As players utilizing OPAP's products and services are served through our agents, training these agents becomes imperative in our effort to ensure Responsible Gaming.

Therefore, we inform our agents about Responsible Gaming and make sure that they comply with the Responsible Gaming regulatory framework and OPAP's principles and rules, with approximately 90% of them been informed and trained on the principles of Responsible Gaming. In particular, within 2015, we:

- Made the OPAP Agents Policy on Responsible Gaming available to all agents through the Agents' portal, with 90% of them signing and formally declaring that are aware of the Policy on Responsible Gaming.
- Distributed the Hellenic Lotteries Points of Sales Network Policy on Responsible Gaming to all distributors of Instant Win games and state Lotteries tickets.
- Trained 671 agents and agent's employees throughout OPAP's commercial network and 1,435 Points of Sales (such as kiosks, mini markets, supermarkets and wholesalers) throughout Hellenic Lotteries' distribution network on Responsible Gaming.

- Communicated Responsible Gaming messages to all agents, wholesalers and street vendors, through OPAPNET Agent's portal, Genion technology and smartphones respectively.

- Uploaded announcements on the Agents' portal, in order to inform them about our policies and relevant regulations.

- Provided access to a dedicated online platform to our agents and their employees, where they can find information about Responsible Gaming issues.

- Sent messages to be displayed on Video Lotteries Terminals on a regular basis.

Did you know...



Symptoms of Excessive Playing

Players who might face issues due to excessive gaming, show symptoms of at least 5 of the following 11 behaviors, according to DSM - IV (Diagnostic Statistical Manual of Mental Disorders of the American Psychiatric Association):

1. Constantly think about games and find difficult to abstain from playing.
2. Continue to play when losing, expecting to break even.
3. Borrow money that they cannot afford to pay back.
4. Have repeatedly tried to quit or reduce playing but with no success.
5. Playing is a way of avoiding their personal everyday problems.

II. Protecting our players

6. Believe that playing is an easy way to earn money.
7. Risk losing their job or/and being isolated from their families.
8. When in the process of playing less or when trying to quit, they become irritable and aggressive.
9. Feel bad and become aggressive when losing.
10. Reach a point where they face financial problems and are in debt.
11. Commit illegal actions in order to continue playing.

Therefore, through OPAP's Responsible Gaming Training Program, agents and their employees are able to identify and distinguish the signs that can be indicative of a player's problematic behavior, as well as provide the necessary advices to mitigate the consequences of excessive playing and the respective referral to competent bodies for counseling and treatment.



Report and Measure

As part of the ongoing evaluation of our programs and communication, we have developed information gathering procedures that effectively allow us to manage and implement our Responsible Gaming activities.

Based on the Responsible Gaming framework:

- We have developed our Responsible Gaming Action Plan, which is managed by the Chief Marketing Officer and the Head of Corporate Social Responsibility Department, who is responsible to develop the action plan, implement relevant cross-functional actions, as well as coordinate and monitor the Responsible Gaming actions implemented by all Units.
- The Head of Corporate Social Responsibility Department receives data from a cross-functional team with Responsible Gaming Coordinators amongst high-level managers for all main functions (Sales, Gaming Operations, Human Resources and Legal), which are used to improve relevant actions and report to Stakeholders.
- We have identified KPIs for each element of the Responsible Gaming framework.
- We constantly review researches, reports and related Responsible Gaming documents

Good Practice...



Assisting Players with Problematic Behavior

The provision of useful information concerning Responsible Gaming to players presenting problematic playing behavior, as well as their relatives or friends, is a crucial element of OPAP's efforts to minimize the potential negative impact of participation to games of chance.

According to the Responsible Gaming Policy, agents and their employees are not allowed:

- To lend money to players.
- To accept alternative forms of payment or credit.
- To underestimate the problem and take no action when they recognize signs of players' problematic behavior.
- To accept playing on behalf of a player.

online submitted by WLA members, in order to be informed about best practices which can be incorporated into our Action Plan.

- We consult with the WLA and EL on their experiences and strategies.

We provide information to players

We undertake every possible effort to sensitize the general public, players and their relatives regarding the potential consequences associated with the irresponsible participation in games of chance, provide useful guidance to players as well as inform everyone about how they can receive practical support or information for any excessive involvement with gaming.

We comply with all labelling legal requirements that are applicable to all our agencies and products, as indicatively mentioned below:

- All our agencies have clear labeling which indicates that participating in games is only allowed to players over 18 years old.
- All our agencies distribute information material regarding Responsible Gaming.
- All games by OPAP S.A. and Hellenic Lotteries S.A. feature advertising material and commercial advertisements, that include relevant labeling with the Responsible Gaming logo, the respective regulator (the Hellenic Gaming Commission), the legal age limit (according to the specific instructions of HGC), the KETHEA - ALFA

helpline number (1114), as well as the adverse consequences that may occur due to irresponsible participation to games of chance.

- All games by OPAP S.A. and Hellenic Lotteries S.A. include Responsible Gaming messages, as well as information on game odds, age restrictions, the regulator, prohibition of selling on credit and the dedicated helpline in all relevant game guides.

- All our above-the-line campaigns (including TV and radio spots, as well as print campaigns) have the disclaimer of the Hellenic Gaming Commission.

- Extensive information on Responsible Gaming is also available through our corporate website, our dedicated Responsible Gaming website and in every game's website.

We educate players to play responsibly

In order to properly inform the players, we provide them with all necessary information related to games, so that they can decide if they will play and select how to play, according to their personal choices and their personal background.

In particular, players have access to information about the game and rules of participating, the possibilities of profit for each one of them, as well as where they can refer to for help in case of excessive play.

II. Protecting our players

Good Practice...



Awareness Campaign

Within 2015, OPAP continued its integrated informational campaign, which was first launched in 2014 and includes print, TV, radio, outdoor and internet sites, for its above-the-line communication, as well as Points of Sales, in order to inform general public about the two basic rules of Responsible Gaming.

It has been the first campaign about Responsible Gaming ever launched in Greece, with the overarching message "The Game Is Fun Only When You Play It Responsibly", which proves the company's commitment to players' education.

The campaign includes messages regarding age restrictions, treatment referral, possible consequences of excessive playing ("Regular participation in games of chance may lead to addiction problems and loss of wealth") and information about the regulatory authority.

The Responsible Gaming campaign which took place within 2015 achieved an 83% outreach and exposure of message in the second wave of broadcasting, compared to 92% in 2014.



83%

reach of our Responsible Gaming communication

We continued our awareness raising campaign for Responsible Gaming, the 1st one ever launched in Greece



Printed Communication

OPAP has developed special posters for its agencies and has issued and communicated an informative brochure, regarding Responsible Gaming.

Issues addressed within this brochure include:

- Players that might face problems.
- Identify problematic behaviors (self-assessment questionnaire).
- What factors lead to excessive play.
- How you can help a player regain control.
- Basic rules for compliance with Responsible Gaming.
- Relationship of young people with lucky games.
- Referral program.

The leaflet is available to all OPAP agencies in Greece.

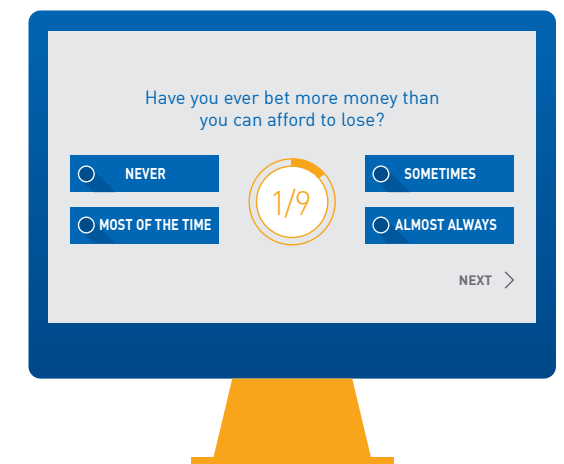


Player Self-Check

Within the above mentioned informative leaflet, OPAP has included a self-assessment questionnaire, based on the Canadian Problem Gambling Index, helping players identify if they face an issue with excessive play.

An interactive version of the questionnaire is also available at the dedicated website <http://responsiblegaming.opap.gr/>, featuring nine easily understandable questions, as well as characters and animations, in order to ensure a user friendly experience.

Upon completing the questionnaire, the player can see the total score based on how correct answers are to the questions asked, which indicates the level of control during gaming.



1. RESPONSIBLE GAMING
2. RESPONSIBLE ADVERTISEMENT

3. CUSTOMER SATISFACTION

II. Protecting our players

Website Information

OPAP has created the first dedicated website about Responsible Gaming (<http://responsiblegaming.opap.gr/>), which provides relevant information and informs the general public about the practices it follows, as well as the main characteristics and profile of Responsible Players, structured around the following sections:

- Responsible Gaming
- Responsible Advertising
- Responsible Sales Network
- “Do you play for the Game”, which includes the player’s self- assessment questionnaire
- Support Program

The website focuses on promoting Rules, such as:

- **Don't play unless you're at least 18 years old**
- **Don't play online unless you're at least 21 years old**

- **Don't exceed the limits you've set for yourself**

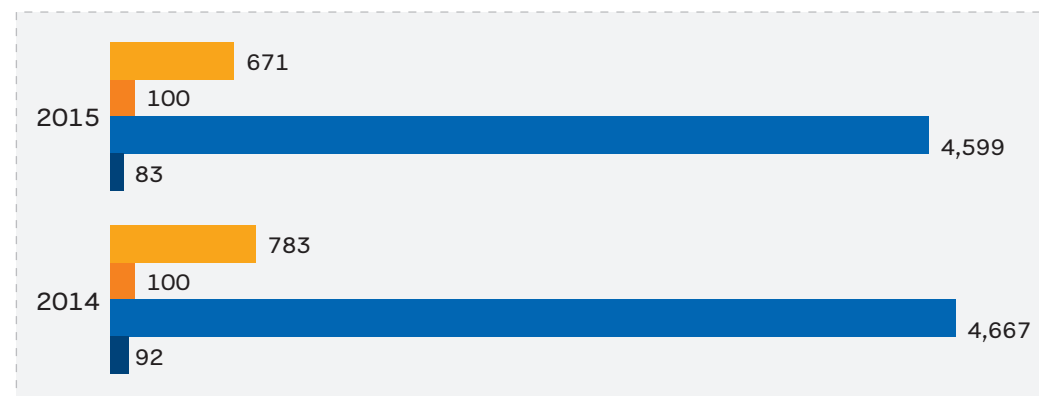
Similarly, Responsible Gaming messages and relevant information have been incorporated in all company websites, which also refer to our dedicated Responsible Gaming website.

Mobile Application

OPAP has also included a dedicated Responsible Gaming section in its “OPAPP” mobile application for smartphones, where players can be informed about the Responsible Gaming principles, as well as the KETHEA - ALFA helpline number (1114).

As a result of our practices, in 2015 there were no fines for non-compliance with laws and regulations concerning the provision and use of our products and services by the relevant authorities.

Responsible Gaming Awareness



- Agents & agents' employees trained on Responsible Gaming (number)
- Agents subjected to awareness campaigns (%)
- Points of sale distributing information leaflets (number)
- Outreach of Responsible Gaming campaigns (%)

2. Responsible Advertisement

We advertise our products with responsibility

Good Practice...



Advertising & Corporate Communication

According to the Code of Conduct and the Communication and Advertisement Policy on Responsible Gaming for both OPAP S.A. and Hellenic Lotteries S.A., which has been disseminated to all employees involved in advertising and marketing with additional briefings and training of external collaborators on what they communicate, OPAP ensures that all advertising and other public communications are legal, decent and truthful, comply with the relevant regulatory framework and respect the rules of Responsible Gaming.

Additionally, all sales promotion activities are fair to participants, aesthetic and decent, do not in any way bring any disrepute, respect the privacy of participants and conform to the relevant corporate policies.

OPAP is fully compliant with the Decision no. 106/2/23.5.2014 (B 1368) of the Hellenic Gaming Commission (HGC) entitled: "Regulating gaming commercial communication issues", as amended and consolidated by the Decision no. 108/2/06.06.2014, which defines the principles that must be applied by gaming operators for their communications, promotion, marketing and advertising activities and, generally, everything that falls within the concept of commercial communication. The model guide of HGC constitutes an additional tool to assist in preparing and

submitting commercial communication plans. Some of the main issues concerning responsible advertising and marketing which are addressed in the above HGC's Decision are:

- Do not target high risks groups through advertising and marketing activities.
- Do not mislead the public about the odds of winning and the amounts that can be won.
- Do not offer illogical incentives in order to attract more players with the promise that they will win anyway.
- Describe in a clear way that profit is purely a matter of chance.
- Do not convey the message that playing is a way of getting rich or a way out of financial difficulties.
- Do not offend ethics and traditions and do not encourage racial discrimination or any discrimination regarding ethnicity, religion, gender or age.
- Do not associate playing with use of substances and do not involve violence, sexual exploitation or illegal conduct.
- Request, in every single occasion, the permission from winning players to appear to the media.

It must be noted that, according to the legislation in force regarding commercial communication of games of chance, both OPAP S.A. and Hellenic Lotteries S.A. are obliged to inform the HGC about their communication plans and actions before their implementation, in order to confirm their compliance with the regulatory requirements.

II. Protecting our players

Within 2015, there were no formal complaints to respective authorities concerning advertising and marketing activities and product or service information (e.g. product labeling).

As a result of our practices in 2015, there were no cases of campaigns being withdrawn after release, no cases of non-compliance with regulations and voluntary codes concerning advertising and marketing communications, product and service information and labeling, while no relevant fines were imposed by respective authorities.



1114

helpline which provides psychological support



1,144

calls made within 2015 compared to 1,006 calls in 2014

Good Practice...



Treatment Referral Player Help-line

Players who consider themselves addicted or in risk of becoming addicted with gaming, can contact the dedicated Therapeutical Support Phone Help-line 1114 by KETHEA-ALFA, which was established in cooperation with OPAP in 2011, at a cost of a single local rate unit, while support information and services are also available via email at 1114a@kethea-alfa.gr.

The line is supported by OPAP (making it the only company in Greece that supports a help line), operates Monday-Friday from 09:00-21:00 and is staffed by dedicated professionals such as sociologists and psychologists, who offer their services to players, their relatives and friends who are forced to manage similar situations.

Within 2015, there were 1,144 calls made to the help line, compared to 1,006 calls in 2014.

OPAP receives from KETHEA monthly reports with statistical data about the help-line's operation, which are then analyzed internally in order to record data such as the demographic characteristics of callers, their playing habits in terms of games or different gaming activities, as well as their behavior in terms of frequency of playing and spending amounts.

It must be noted, that in March 2015, OPAP renewed its agreement with KETHEA-ALFA for two more years, in order to continue its support, monitoring and analysis of the relevant data.

We ensure protection of personal data

The issue of personal data security is particularly important for OPAP, which is taken into account in transactions, as we carry out millions of transactions - payments each year, either through our retail network or through banks we work with.

For this reason we:

- Constantly upgrade our computer systems in order to ensure their reliability.

- Equip our agencies with terminals securely connected to our data processing center via dedicated lines.

- Ensure that all critical processes, including playing and winning ticket identification as well as payment and financial settlement with the agents, occur via the central system.

- Issue a winning certificate, upon player request, according to the provision of the decision of Hellenic Gaming Commission no. 129/2/7-11-2014 (GG B' 3162/25-11-2014) and to the Games Organization, Operation and Conduct General Regulation (Ministerial Decision no. 2167/22-1-2009, GG B' 78) as currently in force. The winning certificate serves as a tax document for the player.

- Record a set of technical data, such as IP addresses and browsers used by our visitors, without associating such data with any information that could be used to identify visitors/users.

- Process online players' personal data only for the purposes for which they are collected, such as the provision of online betting services to them.

- Do not disclose personal data collected in case they are necessary (such as in subscription to a mailing list, purchase of products etc.), to any third party unless otherwise compelled by law.

- Apply all necessary measures to protect player's personal data during the process of issuing the winning certificates.

- Have certified our Information Security Management System according to ISO 27001 and the Lotteries security control requirements, as defined by the Security control Standards (ScS) of World Lottery Association (WLA).

- Use an information system for online gaming to ensure the protection of data stored in terminal machines and central database.

- Comply with the Laws no. 2472/1997 and no. 2774/1999, as well as the Decisions of the Hellenic Data Protection Authority, regarding our Data Collection and Management Policy.


As a result of our practices, we did not receive any formal complaint in 2015 regarding privacy issues or loss of personal data and no relevant fines were imposed by respective authorities.

II. Protecting our players

3. Customer Satisfaction

We seek to satisfy our customers’ needs

We strive to cultivate a reciprocal, sincere and trustful relationship with our customers, by offering responsible and quality products and services. Consequently, we seek new ways to create products and services that serve our customers’ needs.

Good Practice...

Quality Management System

OPAP has developed a certified Quality Management System according to ISO9001:2008, for both OPAP S.A. and OPAP Services S.A., in order to ensure that processes are managed in a systematic way.

The scope of the system includes all activities: design, development, administration, operation and management of gaming product and services.

The system addresses in a systematic way:

- Legislative compliance
- Social responsibility
- Continuous support of agents
- Responsible and objective advertisement
- Protection of players’ private data
- Employee awareness for legislative compliance
- Documented procedures for all business operations

We monitor our performance

To improve customer service, we:

- Developed a complaints management process within 2015.
- Developed a centralized complaints management information system within 2015, in order to record, monitor, manage and assign all complaints and queries received.
- Monitor, on a monthly basis, the number of information queries and complaints, through our telephone center. In 2015, we received 394,568 incoming contacts, with the corresponding percentage of answered contacts being 88%.
- Monitor, on a monthly basis, the case handling efficiency (i.e. how long it takes to resolve a problem).
- Monitor, on a monthly basis, complaints regarding our agencies.

CUSTOMER CONTACTS	2015
Total contacts (number)	394,568
Information (number)	337,196
Average time to resolve complaints (days)	0.7
Complaints received (number)	9,051
Complaints resolved (number)	9,004

Within 2015

Within 2015, the average experience of the call, based on the results of the Satisfaction Survey for calls regarding our agents reached 83%.

Achievements 2015 and Objectives 2016

WE SAID	PROGRESS	WE WILL	BY
Acquire the 2nd Level WLA certification regarding Responsible Gaming for OPAP.	100% <div></div>	Acquire the 4th Level WLA certification regarding Responsible Gaming for OPAP.	2018
Acquire the 2nd Level WLA certification regarding Responsible Gaming for Hellenic Lotteries.	100% <div></div>	Acquire the 4th Level WLA certification regarding Responsible Gaming for Hellenic Lotteries.	2018
Run an awareness raising campaign regarding Responsible Gaming.	100% <div></div>		
Renew the collaboration with KETHEA help-line.	100% <div></div>		
		Conduct an employee survey regarding Responsible Gaming.	2016
Inform and educate our employees about Responsible Gaming.	100% <div></div>	Prepare a training program about Responsible Gaming for employees and agents.	2016
Inform and educate our agents about Responsible Gaming.	100% <div></div>	Conduct an agents survey regarding Responsible Gaming.	2016
Design an intervention for minors play.	100% <div></div>	Launch the pilot phase of the intervention educational program in public and private schools.	2016
Handle end to end complaints and requests handling.	100% <div></div>	Set performance indicators for complaints handling.	2016
		Resolve 85% of complaints received within 1 working day.	2016

III. Supporting our society

Our Philosophy

We believe that corporate growth goes side by side with social growth and prosperity, a principle we have followed throughout the 58 years of our operation in Greece. Thus, one of our key objectives is to build and maintain community trust and support, since the contribution to their sustainable development is also an investment in our own future.

Our Objective

We aim to utilize our business success and invest time, experience and resources to bring back hope to Greece's youth and to secure a better future for them.

Our Priorities

- We extensively contribute to Society
- We ensure transparency of donations & sponsorships
- We cultivate the importance of volunteer contribution
- We responsibly select our suppliers
- We support our suppliers and our local suppliers
- We influence our supply chain
- We follow Legislation
- We reduce our environmental footprint
- We manage use of raw materials
- We recycle or efficiently dispose materials
- We reduce air pollutants
- We monitor water consumption
- We assess our impact on biodiversity

*“We support the society
we conduct our business in.”*



III. Supporting our society

1. Responsible Donations & Sponsoring

We extensively contribute to Society

Following the redesign of our societal support strategy within 2014, we focus on large-scale initiatives that make a difference by meeting large-scale needs in three different areas, namely Health, Sports and Employment.

At the same time, we continue to invest in Responsible Gaming, as the foundation of our operations, and do not neglect to support Sensitive Social Groups & Communities, responding to stand alone needs of Greek society.

Our focus pillars

01. HEALTH

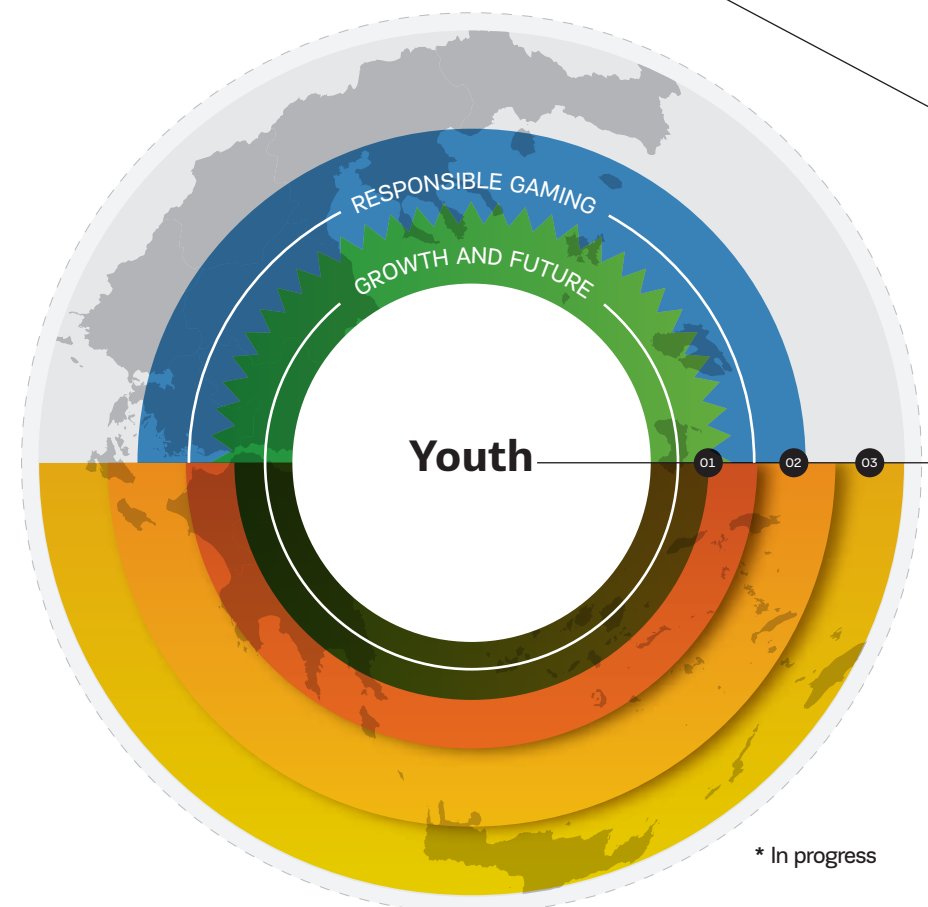
Supporting the well being of the Greek society

02. SPORTS

Supporting the future of Greek sports

03. EMPLOYMENT*

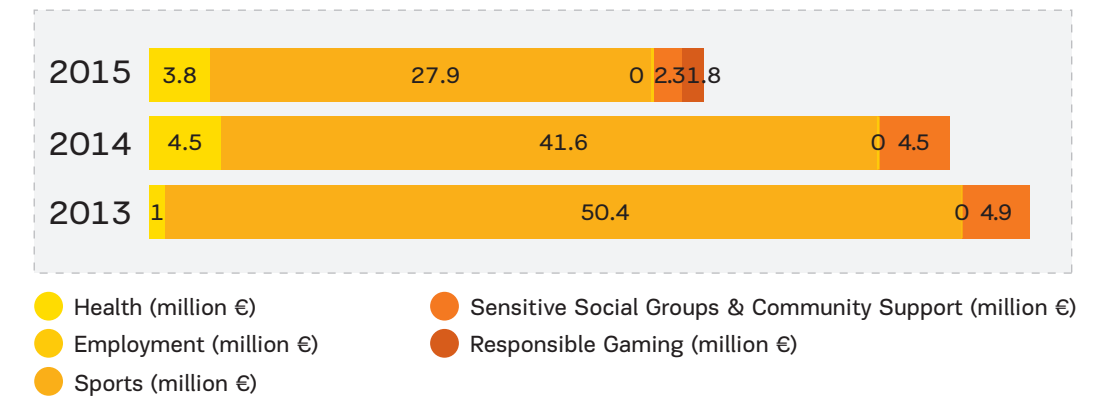
Supporting the growth of the Greek society



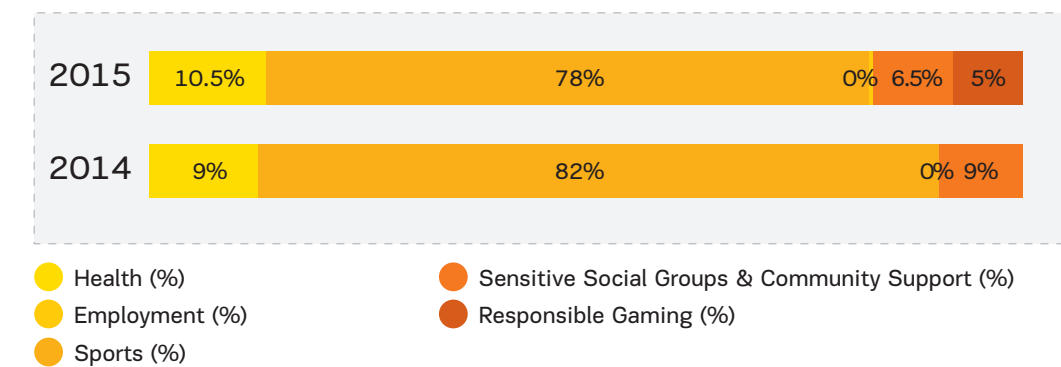
Overall, OPAP has deployed in the last years an extensive societal support program, which included 394 activities in 2015 and 250 in 2014, with a total investment of €36 million in 2015 and €48 million in 2014 (based on the reporting model implemented in 2015 to quantitatively analyze our overall social support).

€36.000.000
were invested to support
394 activities through
our societal support
program.

Societal Support Program - Investments



Societal Support Program - Investment Allocation



1. RESPONSIBLE DONATIONS & SPONSORING

2. RESPONSIBLE PROCUREMENT
3. ENVIRONMENTAL IMPACT

III. Supporting our society

Good Practice...



Responsible Sponsoring

We recognize the importance of our sponsoring practices as they can change people's lives on local and national level.

Since our objective is to reflect the core values that are essential for our responsible operations, in our sponsorships contracts, which include central contracts (e.g. Super League and Volley League), as well as individual contracts (e.g. contracts with the National football team or football and basketball clubs):



€163,000

imposed as penalties in 2015 for incidents of violence which were reinvested to enhance safety measures in sport stadiums

- We have included a clause that approximately 20% of the contract's value will be invested in young people.

- We have introduced clauses against violence since 2010, in order to enhance safety and security in stadiums (e.g. installation of cameras and turnstiles). It must be noted that relevant clauses were included in all new sponsorships contracts within 2015.

- We cooperate with an independent auditing company to monitor expenditures in all contracts.

- We recursively monitor expenditures in central contracts.

Consequently only in 2015, over €163,000 were imposed as penalties for incidents of violence, compared to €196,000 in 2014, which were reinvested to enhance safety measures in sports stadiums.



20%
OF THE CONTRACTS
will be invested
in young people



1. RESPONSIBLE DONATIONS & SPONSORING

2. RESPONSIBLE PROCUREMENT
3. ENVIRONMENTAL IMPACT

III. Supporting our society

Health

Good Practice...



Renovation of two major Children's Hospitals in Greece.

Building on its already rich contribution to the Health sector and prioritizing the improvement of living conditions for children, OPAP undertook in April 2014 the initiative to renovate the two most important, oldest and largest Children's Hospitals in Greece; "Aghia Sophia" and "Panagioti & Aglaia Kyriakou".

OPAP's Hospitals renovation program that comes at a difficult time for Greece, aims to operationally and technically upgrade to its full extent the Hospital Nursing Units and Outpatient Clinics in need, create a pleasant therapeutic environment for the sick children and their relatives via the proper design, chromatic treatment and the entire renovation of hospital premises, waiting and examination rooms of young patients and improve the working conditions for the medical and nursing staff.

This ambitious renovation project is already in full development so that the two Public Pediatric Hospitals that are dedicated in serving children from all over Greece, offer their medical services in high-quality conditions.

In particular by demonstrating consistency between words and actions, OPAP in 2015 delivered two completely renovated floors to "Aghia Sofia" and "Panagiotis & Aglaia Kyriakou" Children's Hospitals. Specifically,

the works that have been completed are the following:

- Replacement of the main elevator at the Children's Hospital "Panagiotis & Aglaia Kyriakou".
- Renovation of the two Nursing Units of the 5th floor of the "Aghia Sofia" Hospital, which extend to an area of 1,800 square meters and have a capacity of 50 beds and Neonatal Increased Care Unit with a capacity of 50 in-cubators.
- Renovation of Nursing Unit on the A' Wing of "Panagioti & Aglaia Kyriakou" 3rd floor, with 550 square meters total area and capacity of 30 beds.
- Repair and partial replacement of the hospitals' equipment and special internal decoration aiming to create an appropriate therapeutic environment for the children's rehabilitation in complete accordance with the contemporary medical concepts.
- Preparatory studies and works for the projects that will be implemented in 2016.

It is scientifically proven, that the quality of the patient's environment plays an important role during someone's therapy. Thus OPAP aims to reform the therapeutic environment of these two Hospitals, using creativity and imagination to build a pleasant place for children.

The whole visual approach at Pediatric Hospital "Aghia Sofia" is inspired from the historical, social and intellectual evolution of mankind, presenting the great achievements of human intellect as a game. Also, the main theme at Children's Hospital "Panagioti & Aglaia Kyriakou" is child's games with moving and famous items that travel us from the earthly environment to the clouds along with children's imagination.

Quotes about the program

"We welcome OPAP S.A.'s initiative to undertake the renovation of the Nursing Departments of the Pediatric Hospitals, the first phase of which has already been implemented. And we hope for the continuation of our cooperation in the future with new actions"



EMMANOUIL PAPASAVVAS

Joint Governor of Interconnected Hospitals "Aghia Sophia" & "Panagiotis & Aglaia Kyriakou"

"I express our heartfelt thanks to our major sponsor OPAP.

The impressive renovation and decoration we all admired will offer our young patients a more pleasant and functional environment. I believe other sponsors will follow OPAP's example acting always in accordance with legal procedures and the consent of the Ministry of Health"



MARIONGA FRAGAKI

President of "Panagioti & Aglaia Kyriakou" Hospital



III. Supporting our society

Health

Good Practice...



Route of Contribution

On the occasion of the 33rd Authentic Marathon of Athens, and following the success of the previous year, OPAP as a Grand Sponsor of the Athens Marathon invited everyone to actively download the innovative mobile application “Route of Contribution” and support virtually the Company’s Renovation Project of the two major Children’s Hospital; “Agia Sofia” and “Panagioti & Aglaia Kyriakou”

Specifically, via the “Route of Contribution” application, OPAP gave everyone the opportunity to play, run and contribute by participating in 9 challenges which gradually “unlocked” in a space of four weeks until the day of the Athens Marathon. Responding correctly to the quiz questions, running the distances required, taking selfies, inviting friends and sharing with them on social media, anyone could virtually contribute up to 20 euros. Even on the day of the 33rd Marathon, on November 8th, all the application users, runners, visitors, even television



613,000 €

virtually raised from all actions of the Athens Marathon



82,500

users downloaded the application

viewers could further raise the amount that OPAP would offer with one simple “check in”. More than 82,500 users downloaded the application and thousands of people visited the website of the program www.diadromi-prosforas.gr, participating and offering to this important cause.

The entire virtual contribution amount was gathered and converted automatically by OPAP into financial support for the renovation of the two pediatric hospitals, with the overall amount exceeding €613,000 from all actions of the Athens Marathon, which constitutes a part of OPAP’s total investment for the renovation of the two hospitals.

Good Practice...



Evaluation of Health Parameters in Greek student population

The “Evaluation of Students’ Physique, Eating Habits and Physical Activity” program, which is supported by OPAP and is implemented since 2012 in all schools of Greece by Harokopio University, evaluates health parameters of Greek student population over time.

The program includes an annual recording of physical characteristics, dietary habits, physical activity and fitness of students in all educational levels, as well as their assessment for all students, free of charge.

The program documents and assesses health parameters in an extensive number of students. More specifically, during 2014-2015, a total of 360,015 students participated from 3,978 schools (kindergartens, primary, secondary and high schools). According to the results of the project “Assessment of



360,015

students participated from 3,978 schools (kindergartens, primary, secondary and high schools)

Students Body Composition, Dietary Habits and Physical Activity Level” for the school year 2014-15, 23% and 10% of the students were classified as overweight and obese, respectively, with boys presenting higher rates of obesity compared to girls (11% vs. 9%).

The problem of excess adiposity was mainly detected at 8 to 11 year-old children, since almost 4 out of 10 students who were in the onset of puberty were overweight or obese.

The regions of Greece with the highest rates of overweight or obese children were those of the Southern Aegean (38%), North Aegean (37%) and the Ionian Islands (35%), while the lowest rates were observed in the regions of Epirus (30%), West Greece (30%) and Thessaly (31%).



Additional activities within 2015

OPAP has supported 6 activities within the Health Sector, such as:

- The 13th National Torch Relay of Voluntary Blood Donors, organized by the Panhellenic Federation of Voluntary Blood Donors (POSEA).
- The maintenance of the medical equipment donated to the Pediatric Hospital “Panagiotis & Aglaia Kyriakou”.
- The employees’ voluntary blood donation to the Pediatric Hospital “Aghia Sofia”.

III. Supporting our society

Sports

Good Practice... Sports Academies



Children are the future of the world and they are the ones that can make it a better place.

Based on this fact, OPAP developed the innovative program “Sports Academies”. In particular, the program serves real needs in sports and creates value for the future generation, benefiting in a holistic way all the interested parties.

Through a solid, concise and effective activation, today, OPAP supports 125 amateur academies in 48 prefectures of the country, which have been selected through a transparent and innovative online procedure, standing by 10.400 young athletes and their 20.000 parents, while it has enrolled coaching experts, to provide ongoing consultation and training to the 450 academy coaches and continually enhance their technical knowledge.

Academies that participate in the program benefit from an integrated educational program which includes:

- A dedicated website (www.sportsacademies.opap.gr), which allows parents, children and coaches to receive information and support from experts.
- A scientific team of specialized pediatricians, psychologists and nutritionists, who

offer scientific support, directions and advice to parents, children and coaches, for better physical and psychological health.

- A team of coaches with great experience in training 7 to 10 year-old children, who organize workshops, visits the academies and participates in training sessions, in order to provide proper directions to the academies’ coaches, based on UEFA international standards.
- An Ambassadors team, consisting of current and former athletes known for their ethos, that serve as role models, participate in the football festivals organized by OPAP and offer valuable advice to children.
- Insurance coverage for all children during training and games.
- High quality sports gear for all children, ensuring high standard training conditions for all of them.

It must be noted that within the context of the “Sports Academies” program, in 2015 we implemented trainings with a total duration of 2,000 hours to parents, children and coaches, based on our solid belief that proper training is a program’s fundamental principle and the key to provide the best sports experience to children.

Our vision is a network of academies that serves as “schools of life”, where every child can participate, every child can play and every child can learn that:

- It’s not so important how many goals you scored, but how hard you have tried.
- It’s not about the passes you gave, but the bravos you said.
- It’s not about the times you celebrated the victory, but the times that you compassed with the losing team.

Quotes about the program

“It is an exceptional initiative that aims to communicate the fundamental principles of fair play, balanced nutrition and psychological health, through a popular sport. The key objective of the nutritional dimension of the program is the formation of a framework that will promote both children sport skills, but also their health, in general.”



ANASTASIOS PAPALAZAROU
Dietitian and President of the NGO “Child Nutrition”

“Children are immensely benefited through the program, since our objective is to encourage them in playing football regardless their level. Through OPAP’s program, the Academies will improve their operation and will provide the children with the best possible mediums for their training.”



KOSTAS TSANAS
Manager of the program’s Team of Coaches, Youth National Team Head Coach, Hellenic Football Generation Grassroots Manager



III. Supporting our society

Good Practice...



Hellenic Paralympic Committee

OPAP is committed to promoting inclusion, diversity and excellence, both in the workplace and in the world of competitive sports.

As the Grand Sponsor of the Paralympic Committee, we are proud to participate in the effort of providing opportunities to Paralympic athletes and increase awareness and popularity of sports for people with disability.

Our motivation comes from Paralympic athletes themselves. These elite performers, who have conquered adversity through hard work, self-confidence, and single-minded determination to achieve excellence in their sports and lives, continually inspire us.

In this context we invest, since 2011, in offering them the needed resources to reach the maximum of their potential.

Our motivation comes from Paralympic athletes themselves.

Quote about the program

"It is a fact that without OPAP's help, the Paralympic Movement would not have been able to achieve all its distinctions in world championships and participate in top sport events. OPAP is on our side and this is a great honor for us!"



GEORGE FOUNTOULAKIS

President of the Greek Paralympic Committee and National Sport Federation for Persons with Disabilities

Additional activities within 2015

OPAP has supported over 180 activities within the Sports Sector, such as:

- The Paralympic Track and Field National Team
- The Greek Golf Federation for the Greece-Cyprus Golf cup
- The donation of athletic equipment to various athletic clubs and unions
- The Hellenic Judo Federation
- The construction of a stadium in Serres
- The teams competing in Super League, Football League, Basket League and Volley League
- The Hellenic National Football Team
- The KAPPA 2000 Cultural Sports Centre for people with disabilities

Employment

Our overall positive impact in the Greek economy is further enhanced by our decision to support entrepreneurship, through the implementation of an integrated program in the area of employment.

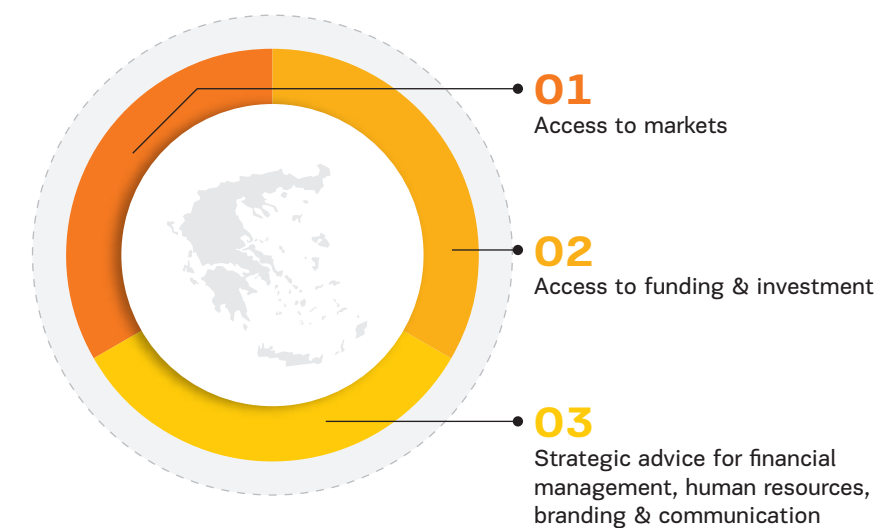
In particular, OPAP, committed to its strategic decision to offer a better future to youth, designs an integrated social program that aims to bring back hope to Greece. The mission of the program is the selection and integrated support of developing companies,

that constitute the backbone of our economy, so that their growth will lead to job creation and wealth generation for the Greek market.

The objective of the program is to stimulate employment in Greece and to create a strong business network that will provide a new viewpoint to the local market.

More specifically, through strategic advice and coaching, the program aspires to offer:

Small - Medium Businesses



III. Supporting our society

Sensitive Social Groups & Community Support

Despite redesigning our societal support strategy to three focus pillars (Health, Sports and Employment), OPAP continues its long-standing contribution to support Sensitive Social Groups & Community, responding even to the increasing stand alone needs of Greek society.

Good Practice...



Wishing Ornaments

For the second consecutive year, OPAP implemented its “Wishing Ornaments” activity, in order to support the “Together for Children” association, a non-profit NGO that works in the field of child welfare and offers every form of assistance to children and young people.

Thousands of people in Athens and Thessaloniki, as well as employees of OPAP, embraced the OPAP’s call and contributed to offer joy and happiness to children supported by the association by making their wishes come true.



3,273

children's wishes come true

Their impressive participation resulted in making 3,273 children's Christmas wishes come true, twice as many compared to the previous year.

Besides collecting and offering presents, OPAP significantly assists the organization’s mission and goals, through its contribution to improve the living conditions in 13 Institutions that are supported by the association.

In particular, OPAP carries out construction, repair and maintenance works, as well as supply of technological equipment and modernization of services and facilities for the unions supported by the association.

It must be noted that within 2015, OPAP fully delivered the construction works that were part of its 2014 “Wishing Ornaments” action, which included the construction of a modern playground for the “Smile of a Child” organization and small-scaled infrastructure activities to the “SOS Children Villages”.



Good Practice...



Music Loves Autism

OPAP supports the “Music Loves Autism” programme for the 2015-2016 period, organized by the Onassis Cultural Centre for the fourth year, which is addressed to children who are on the broad spectrum of autism and their parents and aims to help them to work with the senses and improve their sensory capacities.

The programme takes place at the Onassis Cultural Centre, but also features workshops at other locations, such as Ioannina, Kilkis, Agrinio, Santorini, Volos, Rethymno, Thessaloniki, Lamia, Mytilene and Chania.

The workshops feature musical activities specifically designed to meet the individual wishes and capabilities of children, in order to motivate them, enable them to interact with their environment, develop communication

skills with special emphasis given on the development of non-verbal communication and obtain positive experiences, both individually as well as a family.

Within a safe and entertaining environment and with the participation of specialized professionals, such as musicologists/music therapists and musicians, children experiment with musical instruments and later on take part in various improvisational games based on music.

The programme consists of two circles for each one of the following age groups:

- Children 5-7 years old and their parents.
- Children 8-11 years old and their parents.

Besides the Onassis Cultural Centre, 3 workshops took place in Kilkis, Lamia and Thessaloniki within 2015, with 6 two-hour musical workshops for children and their parents and a two-hour experiential workshop for adults in each city, with 64 children and 64 parents participating in the musical workshops and 59 adults in the experiential workshop.

Additional activities within 2015

OPAP has supported over 196 activities to support Sensitive Social Groups and Community, such as:

- Digitalization of the historic Library in the Holy Theological School of Halki, in collaboration with the Ecumenical Patriarchate, concerning the extension of the Library’s data storage system and the digitalization of its cultural documents, which include rare books and priceless manuscripts.
- Food provision and donation to the Athens Public Nursery.
- Cultural artistic events during the Cultural Festival Prespa 2015.
- The 5th Annual Congress Capital Link CSR in Greece with the subject “Entrepreneurship – Innovation – Society”, organized by Capital Link Hellas.
- The activities of various NGOs and charitable institutions, such as the Social Initiative Association of Veria “Initiative for the Child”, the Lighthouse for the Blind of Greece and the Greek Down Syndrome Association.

III. Supporting our society

We ensure transparency of donations and sponsorships

We gathered 155 blood units through our employees' voluntary blood donation program.

To ensure that donations and sponsorships are utilized as per the requirement for which they were approved:

- Their recipients are required to attach and submit the necessary documentation before they are paid.
- In cases of construction projects, we perform on-site inspections and we additionally ask for photographs and other related documentation as a proof that they have proceeded and carried out the project.
- In cases of sponsorship benefits implementation, an independent contractor conducts monitoring visits and all findings are reported.

We cultivate the importance of volunteer contribution

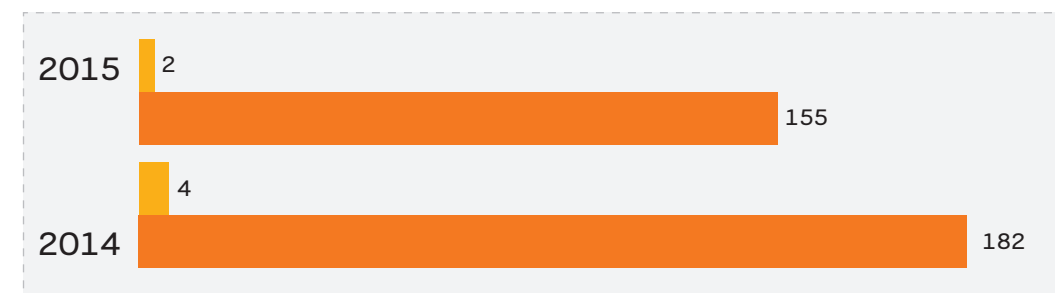
We believe that it is our responsibility as a company to cultivate the importance of volunteer contribution to our employees, in order to utilize their skills for the good of society, as well as integrate the concept of responsibility in their way of thinking and behavior.

In 2014, our employees participated in a voluntary food contribution for the children, which was later doubled by OPAP S.A. and offered to the Athens Public Nursery School.

The voluntary blood donation at OPAP began in 2005 and takes place every six months at our headquarters. Following the relevant initiative of our Group's Employee Unions, we have established a Blood Bank with a large number of available blood units, as a result of our employees' participation and voluntary cooperation with respective hospitals.

Within 2015, we implemented two blood donation programs and gathered in total 155 blood units, out of which 90 were utilized for our employees' needs.

Voluntary Blood Donation



● Voluntary blood donation programs (Number) ● Blood units collected (Number)

2. Responsible Procurement

We responsibly select our suppliers

Since we are one of the largest companies in the Greek market, we can significantly influence our suppliers' responsible operations. Therefore, we fully recognize the role that we can and should play to promote the principles of Corporate Responsibility in our supply chain.

OPAP follows the principles of transparency and equal opportunity in its interaction with suppliers, aligned with the Corporate Governance principles, and takes every possible measure to ensure the objectivity of procurement processes.

We support our suppliers and our local suppliers

Our suppliers are more than 2,100 throughout Greece and abroad, with 88% of them being local suppliers. In order to enhance national and local development, we seek to utilize local suppliers for our purchases, with the percentage of procurement spending from local suppliers reaching 91% in 2015, compared to 98% in 2014.

91% of total purchases were made through local suppliers.

Considering the current financial situation in Greece, we adjust our payment terms and bank guarantees to market conditions and assist our suppliers to overcome the present financial conditions. Indicatively, the average actual payment time in 2015 remained at 30 days, as in 2014.

We influence our supply chain

OPAP includes in all formal tenders and agreements with its suppliers a clause, which specifically states that the supplier is required to comply with Labor, Environmental and Occupational Health and Safety laws and regulations and possesses all licenses required for lawful operation, which shall be provided upon request with reasonable notice.

Following the new Procurement Policy developed in 2015, suppliers are registered with updated financial and business data on a yearly basis from the beginning of 2016, stating if they are currently certified according to ISO 9001, ISO 14001, ISO 27001, SA 8000, OHSAS 18001 and/or other standards, with particular attention given to suppliers for products and services with increased impact to environment and society, such as cleaning and security services, as well as distribution of materials to agents. As part of the new Supplier Registry and Supplier Evaluation form, suppliers in all tenders are requested to report if they are certified for the above standards, with certified suppliers being generally preferred in tenders of over €50,000. Monitoring of existing and new suppliers is performed through the Review of Suppliers' Environmental Performance, as well as the Review of Suppliers' Corporate Social Accountability Principles, which assesses issues such as:

- Use of Social Accountability Systems (such as SA8000 or ISO26000)
- Labor legislation
- Health & Safety of employees
- Freedom of association
- Work-life balance
- Work conditions

In 2014, we requested from a 25% sample of suppliers to provide information regarding environmental, labor, human rights and impacts on society practices. Based on information from this sample, we did not recognize any actual or potential negative environmental, labor, human rights or society impacts.

III. Supporting our society

3. Environmental Impact

We follow legislation

We aim to comply with the current environmental legislation and its relevant provisions. Therefore, in order to ensure compliance with the law and minimize our environmental impact, we conduct all necessary environmental impact assessments. It must be noted that within 2015, OPAP was not accused of violating any environmental legislation and no respective fines were imposed, during the scheduled and ad-hoc audits conducted by the relevant authorities.

We systematically manage our environmental impact

Good Practice...



Environmental Management System

Although OPAP is a labor-intensive services company without being involved in manufacturing activities, it has developed a certified

Environmental Management System according to ISO14001:2004, for both OPAP S.A. and OPAP Services S.A., in order to ensure that potential impacts on the environment due to its operations, are addressed and reduced in a systematic way. The scope of the system includes all activities: design, development, administration, operation and management of gaming products and services.

As part of this system, OPAP identifies and evaluates the environmental impact of its activities, structured around 5 steps:

1. Identify environmental aspects
2. Determine environmental impacts
3. Evaluate environmental impacts
4. Issue and review environmental aspects evaluation
5. Define measures and monitor actions and performance

Through the above procedure, we have identified the following environmental aspects as the most important:

- Printing and copying materials
- Paper
- Electricity
- Electrical equipment

Energy Consumption

SOURCE	CONSUMPTION 2013	CONSUMPTION 2014	CONSUMPTION 2015
SCOPE 1			
⌵ Diesel - Heating (lt)	24,000	22,748	46,000
⌵ Natural Gas (m³)	20,752.6	13,369	4,284.6
SCOPE 2			
💡 Electricity (KWh)	6,417,357	6,384,272	4,960,391*

* Electricity consumption refers to all our buildings (in Athens, Kifisia, Thessaloniki, as well as our owned store).

We reduce our environmental footprint

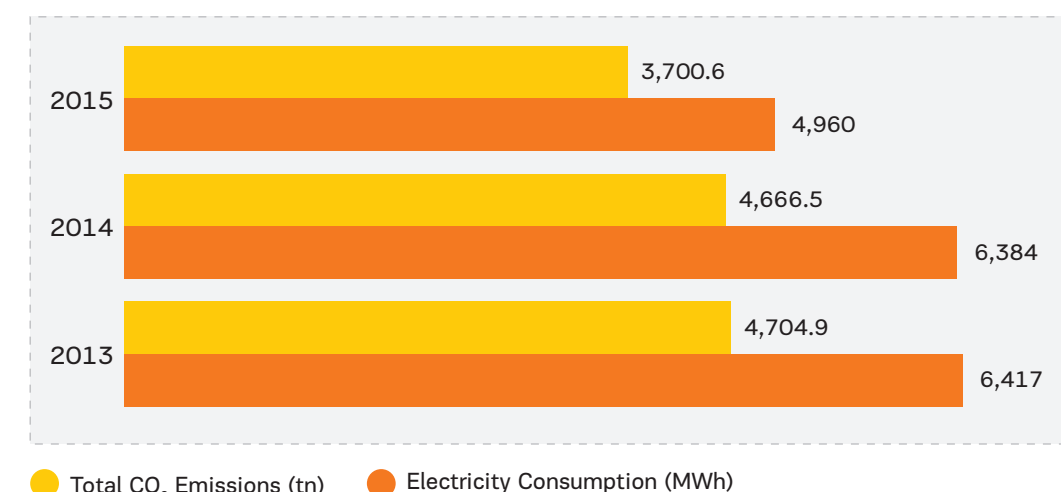
In order to identify the sources from which we can reduce our environmental footprint, we quantify direct and indirect greenhouse gas emissions sources from our operations, which primarily results from electricity consumption in our buildings and secondarily from fuel consumption, as shown below:

Within 2015

- We moved out from our building in Kifisia.
- We relocated our offices in Thessaloniki to a site where no heating diesel or natural gas consumption is required, while its electricity consumption was 87% lower compared to 2014.
- We assigned distribution of playslips to external partners, thus reducing the scheduled routes of corporate vehicles.
- We reduced the total number of owned vehicles, by selling vehicles in excess.

As a result of our practices, the average electricity consumption per employee reduced to 6,295 KWh, compared to 9,822 KWh in 2014.

Electricity Consumption and CO₂ Emissions



● Total CO₂ Emissions (tn) ● Electricity Consumption (MWh)

* Electricity consumption refers to all our buildings (in Athens, Kifisia, Thessaloniki, as well as our owned store).

III. Supporting our society

We manage use of raw materials

We recognize that raw materials are not inexhaustible.

Within this context, it is our priority to use natural resources as efficiently as possible and reduce resulting waste from any corporate activity.







Therefore, we:

- Acquire materials with a relatively lower environmental impact, such as light bulbs
- Monitor use of materials
- Reduce use of materials
- Reuse materials
- Recycle materials
- Properly dispose materials

We recycle or efficiently dispose materials

Waste associated with OPAP's activities are a direct result from operations in our buildings (i.e. paper, toners, cardboard), according to the following classification:

Materials Recycling

MATERIAL	RECYCLED BY	RECYCLING 2013 (kgr)	RECYCLING 2014 (kgr)	RECYCLING 2015 (kgr)
 Paper	VECO / Aberiadis	46,340	2,410	47,895
 Cartridges-toners	EcoLink	102 (units)	-	310 (units)
 Light bulbs	Kosmopoulos	-	27 (crates)	2,320 (units)
 Domestic batteries	AFIS	80 (with additional 1,881.5 kgr recycled from our agencies)	63 (with additional 1,816.2 kgr recycled from our agencies)	120 (with additional 1,520.9 kgr recycled from our agencies)
 IT hardware and equipment (computers, printers etc.)	Kosmopoulos	2.159 (units)	15 (units)	2,587 (units)
 Furniture	Kosmopoulos	-	-	678 (units)



Employee awareness

We prepared the training materials on environmental awareness for our employees, without however conducting relevant seminars or trainings within 2015.



Recycling containers

Used materials are not waste, but they can be recycled for new products. For this reason, we have placed containers to collect and forward for recycling paper, cartridges - toners electronic equipment, as well as domestic batteries in our facilities.



Paper

In 2015, we consumed 16.9 tons of paper, a quantity reduced by 22.8%, compared to the 21.9 tons in 2014. At the moment, we do not use recycled or FSC certified paper or any other recycled materials.



Light bulbs

In 2015, we used economy bulbs to replace all old light bulbs that were sent to recycling (2,320 units).



Cartridges-toners

In 2015, we acquired 505 cartridges and toners and forwarded over 60% of them for recycling, as they were used. At the same time, we included specific instructions on our corporate intranet, to which all employees have access, concerning the proper way to use and handle toners.

We reduce air pollutants

Refrigerants: Within 2015, we used R407 and R410 in our air-conditioning systems, which do not harm the Ozone layer, as their Ozone Depleting Potential (R-11 equivalent) is zero.

Air pollutants: During the relevant inspections within 2015, there were zero over the limit cases in pollutants such as carbon monoxide and volatile organic compounds (VOCs), while it must be noted that no significant sulphur and nitrogen oxides emissions are generated due to our operations.

We reduced our total carbon dioxide emissions by 20.7%, our electricity consumption by 22.3% and our paper consumption by 22.8%

III. Supporting our society

We monitor water consumption

Did you know... Water consumption

According to a study conducted by the international environmental organization WWF, Greece is placed second worldwide in the per capita water consumption, with an average annual consumption of 2,389 cubic meters, which is almost twice as high as the average world consumption of 1,243 cubic meters, an indication of how poorly managed water resources are in our country.

Being conscious of the responsible approach required on this issue, OPAP aims to contribute to alleviate the water shortage phenomenon. Among other, we implement the following actions:

- Water supply is exclusively through the public water supply networks, therefore we do not affect other water sources.

- We monitor and reduce water consumption, based on water gauges installed in key areas in our facilities (buildings, gardens).

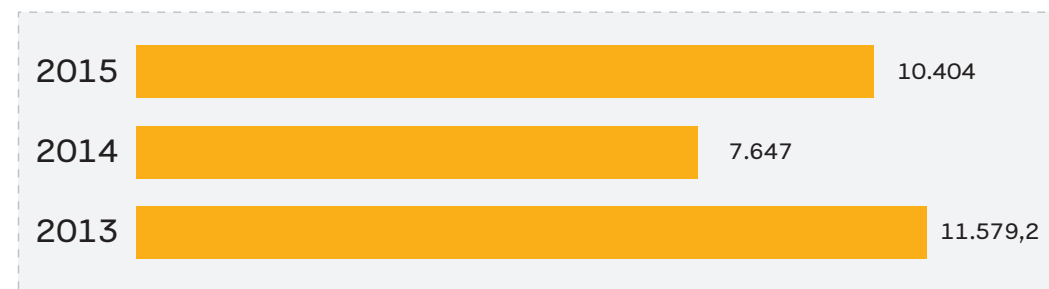
- We ensure that there are no significant water leakages or discharges and no spills of other liquids. It must be noted that within 2015, there were no significant water leakages or discharges and no significant spills of chemicals or fuels took place.

Our total water consumption in 2015 was 10,404 m³, compared to 7,647 m³ in 2014, with an average water consumption of 13.2 m³ per employee.

We assess our impact on biodiversity

All our offices and buildings are located within urban environment without any adjacent protected areas or areas of high biodiversity value outside protected areas and, therefore, are not subject to any specific biodiversity protection regulations and safeguarding measures.

Water consumption



● Water consumption (m³)

*Water consumption refers to our buildings in Athens, Kifisia and Thessaloniki.

Achievements 2015 and Objectives 2016

WE SAID	PROGRESS	WE WILL	BY
Include clauses against violence - safety in all new sponsorships contracts.	100%		
Renovate 2 floors of Pediatric Hospitals "Aghia Sophia" and "Panagioti & Aglaia Kyriakou".	100%	Renovate 2 floors and central staircases of Pediatric Hospitals "Aghia Sophia" and "Panagioti & Aglaia Kyriakou".	2016
Construct a modern playground at the "Smile of a Child" organization.	100%		
Implement infrastructure activities at the "SOS Children's Villages" in Vari.	100%	Implement construction, repair and maintenance activities to facilities and technological equipment of the "Together for Children" association.	2016
Support a network of 125 amateur sport academies in Greece.	100%	Organize 10 Sports Academies Festivals across Greece. Design and launch an integrated program on employment.	2016
Train employees on environmental awareness in company's sites.	25%	Train 70% of employees on environmental awareness.	2016
Replace old burnt light bulbs with economy bulbs.	100%		
Implement at least one collection and recycling program for old light bulbs and electronic equipment waste.	100%	Implement at least one collection and recycling program for waste light bulbs and electronic equipment waste.	2016
Recycle at least 70% of paper consumed.	100%	Recycle at least 70% of paper consumed in our office.	2016
Collect and recycle at least 40 kgr of domestic batteries (with an additional 1,000 kgr from our agencies).	100%	Collect and recycle at least 45 kgr of domestic batteries (with an additional 1,000 kgr from our agencies).	2016
Collect and recycle at least 70% of used cartridges-toners.	75%	Collect and recycle all used cartridges-toners.	2016
Review environmental performance via questionnaires in 50% of OPAP S.A.'s suppliers/contractors.	0%	Review environmental performance via questionnaires in 50% of suppliers/contractors with an annual spending of over €100,000.	2016
Consume less than 30,000 lt of diesel for heating.	0%		
Achieve electricity consumption per employee lower than 7,600 KWh.	100%		
Achieve water consumption per employee lower than 15 m ³ .	100%		

IV. Caring about our employees

Our Philosophy

We recognize that achieving our strategic objectives and maintain our growth is closely connected to the performance of our employees. Therefore, we create work positions and promote a work environment of transparency, responsibility, respect, equality and safety, while providing training and development opportunities for our employees.

Our Objective

We aim to create a work environment, which is safe, fair and facilitates the professional development of our employees.

Our Priorities

- We create work positions
- We monitor employees' satisfaction
- We offer additional benefits
- We ensure Health and Safety in our work environment
- We commit ourselves to being fair
- We do not tolerate child, forced and abusive labour
- We respect the right of employees to participate in employee unions
- We train our employees
- We develop our employees
- We employ effective internal communication tools

*“We establish
a positive work
environment
for our employees”*

1. EMPLOYMENT CONDITIONS

2. EQUALITY & FAIRNESS
3. TRAINING & DEVELOPMENT

IV. Caring about our employees

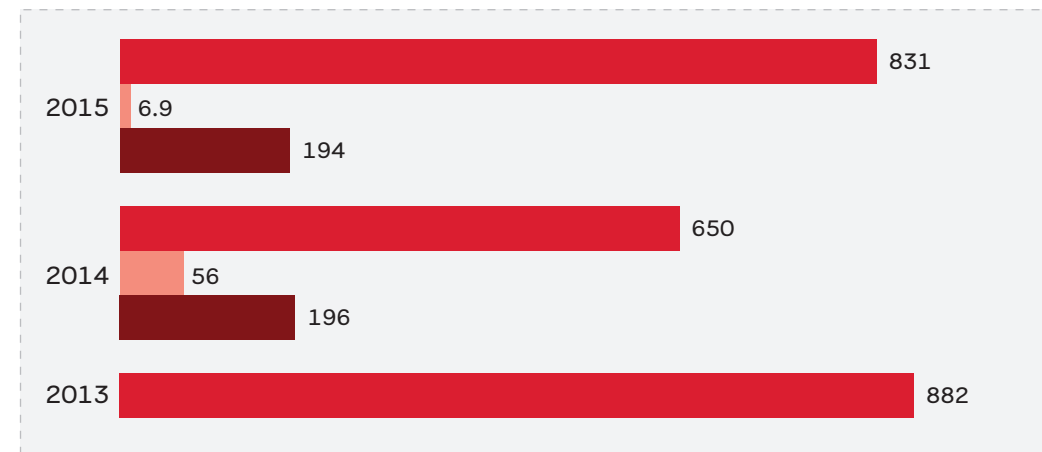
1. Employment Conditions

We create work positions

OPAP employs 831 employees in Greece, while our business activity indirectly generates approximately 20,000 work positions in our OPAP agencies network all over Greece, an especially important parameter considering the current economic crisis.

We directly employ 831 employees, while we support approximately 20,000 work positions all over the country.

Human Resources



● Employees (number) ● Turnover (percentage) ● New hires (number)

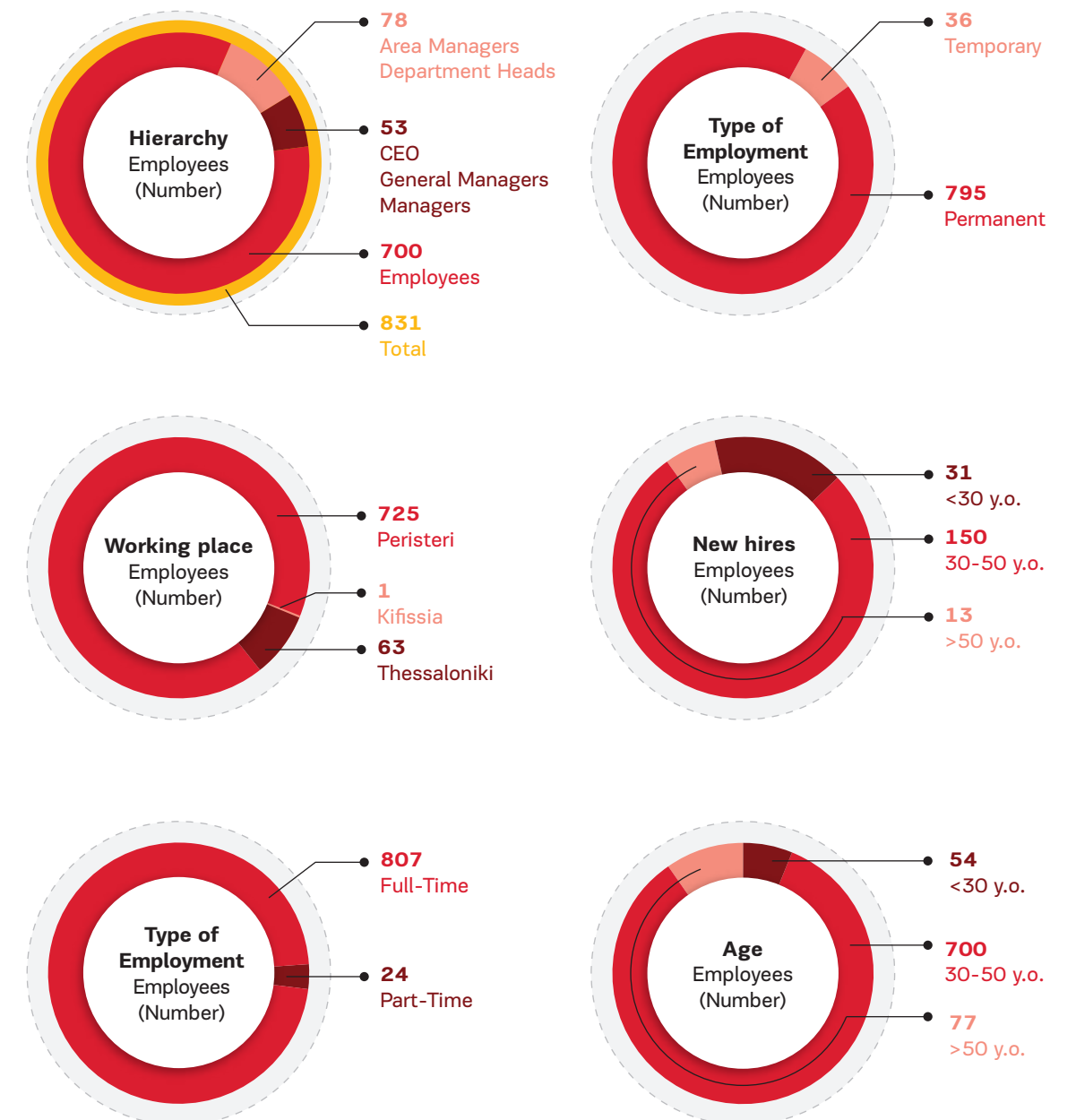
*Data refer to 31/12/2015; include OPAP S.A., OPAP Services S.A., Hellenic Lotteries S.A., Horse Races S.A. and Payzone Hellas S.A.

**2014 and 2013 data include OPAP S.A., OPAP Services S.A., OPAP International LTD and Hellenic Lotteries S.A.

Some of the main characteristics of our employees are:

- 95.6% of employees have permanent contracts
- 97% of employees are employed full-time
- The average age of our employees is 39 years
- The average turnover rate is 6.9%
- There are no variations in employment numbers due to seasonality
- There were 21 external partners working with OPAP during 2015

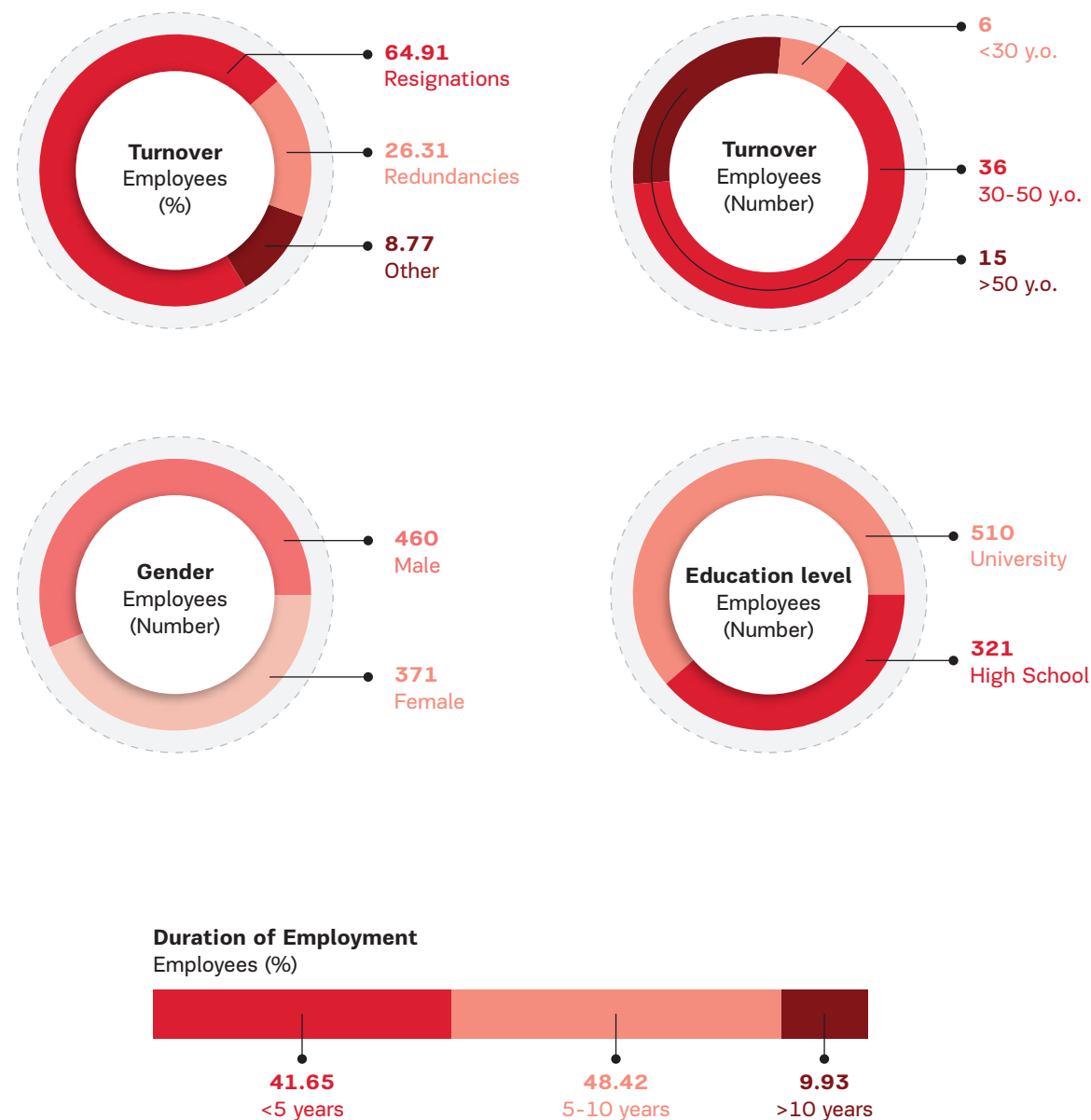
Employee Distribution



1. EMPLOYMENT CONDITIONS

2. EQUALITY & FAIRNESS
3. TRAINING & DEVELOPMENT

IV. Caring about our employees



*Data refer to 31/12/2015

We monitor employees' satisfaction

In 2014 we launched an Employee Engagement Survey for the first time, in order to capture employees' perception on issues such as management, organization, collaboration, compensation and working environment, without however conducting a similar one within 2015.

The 2014 survey was completed by 71.2% of eligible employees and the high score of employees' engagement (84%) verified that employees share the same vision and values with the company, as indicated by the areas with the highest scores, which were customer service orientation, pride in working for OPAP and clear understanding of Group roles.

On the other hand, further focusing on training, development and growth were identified as areas for improvement.

In March 2015, OPAP's employees participated in six focus groups, in order to be informed and discuss the results of the Employee Engagement Survey, as well as propose their ideas about the company's next steps.

Based on their attendance and participation, OPAP formed an Employee Engagement Action Plan, which primarily focuses on the Performance Appraisal Process and the Training and Development Plans.

We offer additional benefits

Besides legally regulated benefits, we aim to apply a unified policy for our employees' care and support.

Therefore:

- We offer a Life Insurance and Medical plan, which covers 93.2% of all our active employees (permanent employees of OPAP S.A., OPAP Services S.A., Hellenic Lotteries S.A. and Horse Races S.A.) effective April 1st 2014, in collaboration with a specialized insurance broker, with an annual checkup offered through the health insurance scheme.

- We offer additional benefits to permanent employees according to business needs, as indicated below:

Benefits

	(Percentage of employees covered)
Mobile phones	49.4%
Laptops	42%
Corporate cars	17.4%
Gas cards	20%

Within 2015

All 12 female employees who received their eligible parental leave returned to the company.

IV. Caring about our employees

We ensure Health and Safety in our work environment

It is our priority to establish a safe work environment for our employees.

Therefore, we focus on following health and safety regulations and ensuring suitable work conditions, by implementing the following main actions:

- We occupy one doctor and two nurses for emergency cases.
- We perform respective audits on Health and Safety practices, within the scope of our Integrated Management System.
- We have identified occupational and work conditions risks, which are recorded in written

Occupational Risk Assessment Studies, for both OPAP S.A. and OPAP Services S.A.

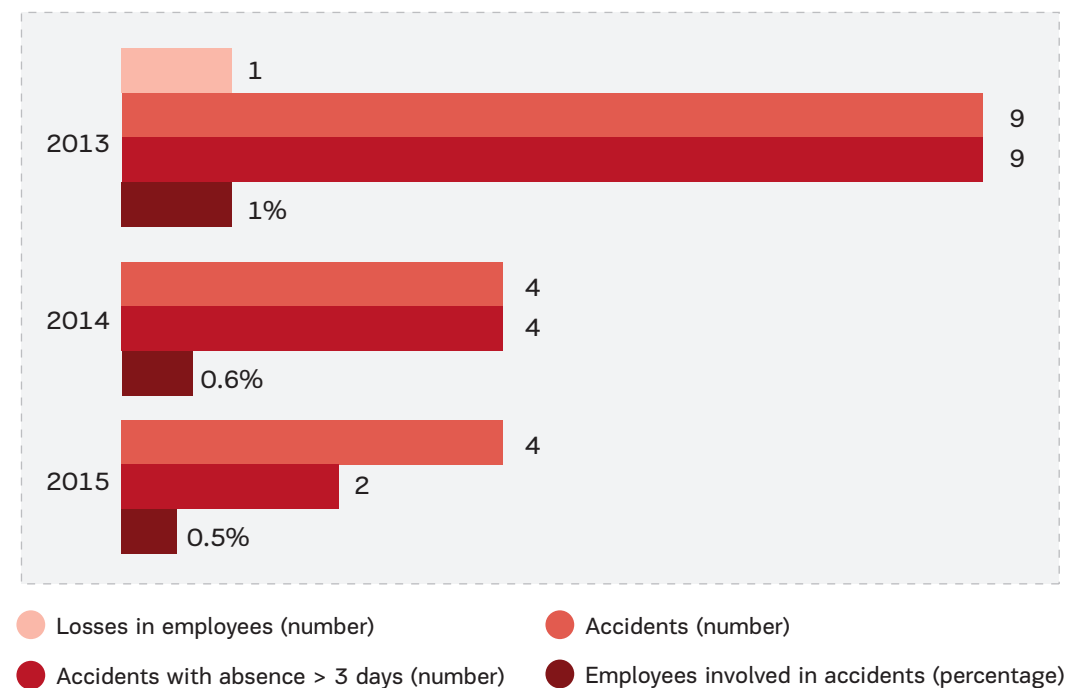
- We conducted 2 evacuation exercises in our premises in Athens and Thessaloniki.

The results of our approach are reflected in the table, where incidents related to Health and Safety are summarized.

It must be noted that:

- There are no employees with high incidence or risk of disease associated with their work within OPAP.
- There were no serious accidents involving OPAP employees.
- There was only one incident involving a female employee.

Health and Safety



2. Equality & Fairness

Good Practice... Social Accountability Management System

OPAP has developed a certified Social Accountability Management System according to SA8000, for OPAP S.A. and OPAP Services S.A., in order to ensure that its procedures are aligned with the principles of respecting human rights.

We commit ourselves to being fair

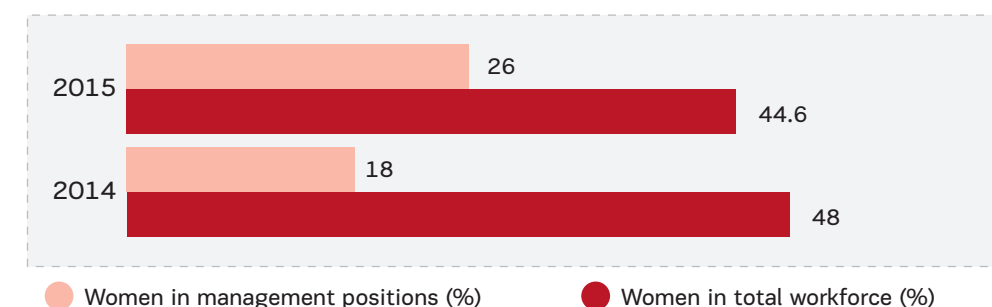
Our policy is not to discriminate due to race, gender, marital status, political beliefs, religion, origin, sexual orientation, age and disabilities, regarding work issues, such as recruitment and selection, wages, promotions and career development.

Our commitment relies upon the principle of equal treatment of our employees, which allows their development and professional advancement to solely depend on their performance, their abilities and needs of OPAP.

It must be noted that:

- There were no complaints or grievances regarding discrimination incidents or unfair treatment within OPAP.
- There were no complaints or grievances regarding human rights violation or labor practices.
- The minimum salary at OPAP was in all cases higher than the legal basic salary (or the higher collective agreement salary), as defined by local legislation.
- The proportion of salary for men and women is almost equal, within similar hierarchical level/area of activity/job family, with statistically insignificant variations.
- The percentage of women in management positions is 26%, while the percentage of women within the overall workforce is maintained above 44%, compared to 18% and 48% respectively in 2014.
- The percentage of women in department management positions is 31%, while the percentage of women in division director positions and top management positions is 23.2% and 21.4% respectively.
- The percentage of Greek nationals in top management positions is 36.4%, compared to 10% in 2014, while the percentage of Greeks in the BoD is 41%.

Gender Distribution



IV. Caring about our employees

We respect the right of employees to participate in employee unions

As described in our policies and the internationally recognized principles of human rights, we respect the right of our employees to openly and freely express their opinion, either individually or in groups.

It must be noted that:

- Approximately 45% of OPAP's employees participate in Employee Unions.
- 100% are covered by the Greek National Collective Bargaining Agreement.
- No operations in which the right to exercise freedom of association and collective bargaining may be at significant risk have been identified.
- 22 of our employees (approximately 2.6% of our total workforce) participated in two National General Strikes within 2015, organized by the General Confederation of Greek Workers (GSEE), due to governmental policies regarding the National Insurance System and employment-related legislation. The total amount of work hours lost due to strikes was 39 working days.
- Our company follows, as a minimum, the relevant regulatory requirements regarding operational changes.



45%

of our employees participate in Employee Unions

We do not tolerate child, forced and abusive labor

We respect the internationally recognized principles of human rights, as these are described within the UN Universal Declaration of Human Rights and the ten Principles of the UN Global Compact.

Based on these principles, we are committed not to employ any person below the legal age work limit (as defined by the Greek legislation).

We are also committed not to encourage or tolerate any coercive or abusive labor in any of our premises.

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

3. Training & Development

We train our employees

Induction Training: Within the first two months of their employment, all new hired employees participate in an Induction Training program, which aims to familiarize them with the company and accelerate their integration into OPAP's corporate culture.

Through its experiential nature, featuring a wide range of corporate presentations, videos, site visits, icebreakers-teambuilding exercises and role playing, the training addresses the following:

- Company profile and history
- Vision and Values
- OPAP ID - Living the brand
- Products
- Business Units (strategy, organization, policies and procedures)
- Professional appearance and behavior
- Corporate Responsibility
- Code of Conduct
- Health and Safety
- Responsible Gaming, IT security and ISO awareness

Orientation Training: The integration of new hired employees continues with the Orientation Training, where their immediate supervisor informs them about the department's operation, through:

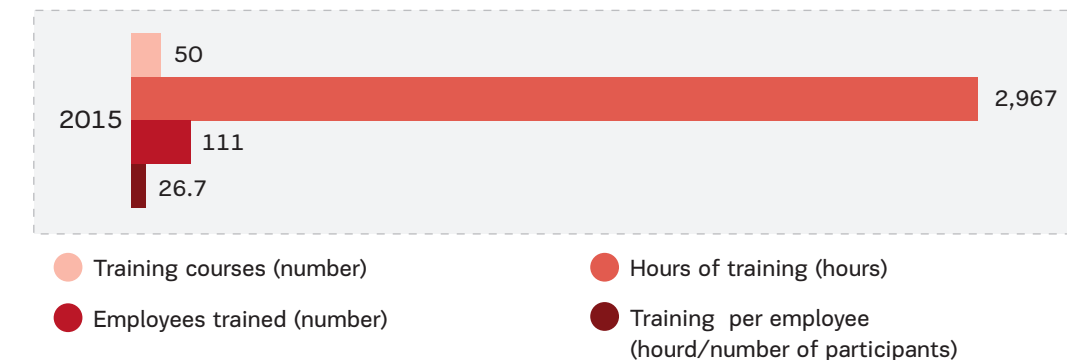
- Meetings with the department's employees
- On-site visit
- Information on technical issues
- Familiarization with the department's systems and procedures
- Information on Health and Safety issues

OPAP implements a wide range of training programs, as we fully understand the importance of continuous and proper training to our employees, in order to ensure the proper implementation of our corporate strategy and long-term business success.

For this reason, we train our employees in areas such as:

- Soft skills (e.g. Leadership)
- Technical skills (e.g. Accounting, Procurement, SharePoint)
- Certificates (e.g. PMP, TOGAF)

Employee Training



IV. Caring about our employees



13.3%

of our employees were trained, for an average of 26.7 hours

Additionally, we conduct training courses to develop our employees' knowledge and skills according to the principles of lifelong learning, rather than support their current employability.

Within 2015:

- We conducted 50 training courses with the participation of 111 employees.
- We trained 13% of our employees on skills development.
- The total duration of training courses was 2,967 hours, averaging 26.7 hours per participant.
- The total cost of training courses was €146,408.

Good Practice...



OPAP Academy

In 2015, OPAP launched the OPAP Academy, as an initiative to link employees' training and development with OPAP's strategic objectives and performance results, as well as actively involve all employees to achieve business results.

With the objective to enhance employees' commitment to perform and be proud members of OPAP, OPAP Academy aims to cultivate the new unified corporate culture and common communication platform through a structured Training plan throughout 2016 and 2017, based on the following strategic priorities:

- Establish a continuous learning and development culture.
- Build and sustain a high performing mindset.
- Strengthen leadership team's competencies.
- Develop our talent pool.

OPAP Academy's key role is to:

- Re-engineer and enhance our competencies.
- Promote teamwork and interpersonal relations.
- Increase our customer orientation.
- Encourage our "out of the box" thinking.
- Empower initiative and effectiveness.

To design and structure OPAP Academy, we mapped all training needs across units and levels, based on several meetings conducted with all Unit Heads and Division Directors, in order to:

- Clarify competencies and skills-based training requirements per employee.
- Use diagnostic methods to ensure identification of all employees training needs.
- Align training priorities in 2016 and 2017.
- Capture all current and future organizational changes in accordance with their business plan.

After the launch of OPAP Academy, we implemented the 2-day "Leaders of High Performing Teams" workshop, with the participation of 37 Senior Level Managers/Directors, from all Units in mixed groups.

We develop our employees

Policy...



Business Priorities and Individual Development Plans

According to a formal corporate Policy, OPAP collects all Individual Development Plans from the annual Performance Appraisal system and clusters the proposed training needs in the following theme areas:

- Business Skills.
- Technical Skills.
- PC Skills.
- Business English.



IV. Caring about our employees

Training needs are further exemplified and prioritized through meetings with Managers and Department Heads, based on each employee's competencies and skills, as well as each department's current and future requirements, according to their strategic planning.

Once meetings are completed, training needs are processed, analysed and included in OPAP's preliminary Annual Training Plan. The analysis of training needs first occurs for each employee, then by department/division/unit and finally for the entire company, taking into account:

- The various groups of participants from different departments per theme area.
- The implementation timetable based on a 2-year prioritization of training needs.
- The duration of each training program.

For the first time in 2015, OPAP implemented a Performance Appraisal system for all employees' categories, based on:

- Specific objective criteria.
- Job performance.
- Professional competencies.
- Knowledge about OPAP's targets and objectives.

By taking into account our employees' current set of skills, as well as the abilities and areas of improvement for each employee:

- We plan the required actions to achieve desired results.

- We decide on how to develop our employees and help them achieve professional objectives, as well as advance their career prospects.

- We consider our employees' development plans for drafting our Training plan.

- We determine ways to improve productivity.

Within 2015

all of our employees were assessed within the context of our Performance Appraisal system.

100% of our employees participated in performance evaluation process.

Policy...

Career Development Opportunities

According to a formal corporate policy, which initially applies to non-managerial positions only, OPAP seeks to cover job vacancies, whenever they arise, giving priority to its existing human resources, thus providing the employees with the opportunity to:

- Work in different work areas.
- Move on the same level in different Divisions.
- Work in a different location.

Internal Advancements

It is important for OPAP to support the development of its employees, in order to achieve their personal goals and development plans. All job postings are communicated with an internal announcement through the corporate Intranet, where all employees who comply with the required profile can submit their application.

Within 2015

5.7% of permanent job openings were covered by internal candidates.

Job Rotation

Following the company's overall restructuring, OPAP is in the process of establishing job rotation for its employees, in order to keep them motivated and provide the opportunity to acquire additional knowledge and experience.

Job Descriptions

In our attempt to help increase individual and organizational effectiveness, we believe that every employee position has to be accompanied by a suitable job description, as a written statement of a specific position.

As a result, there is a valid job description for every single position within OPAP.

We employ effective internal communication tools

To create a homogeneous corporate culture, we have established a systematic dialogue with our employees, via internal communication processes, utilizing various means, such as:

- The internal network (intranet), where employees are timely informed on corporate news, benefits and policies.
- Mass emails to all employees, in order to become aware of all HR policies, organizational updates or important corporate information.
- Informative leaflets, in order to ensure that all employees are informed about key Group actions (e.g. regarding Responsible Gaming).
- Information posters in all buildings, in order to raise awareness regarding projects such as Health & Safety and Employee Engagement Survey.
- Social activities, such as a pre-Christmas corporate event and a party for employees' children.

Achievements 2015 and Objectives 2016

WE SAID	PROGRESS	WE WILL	BY
Introduce Code of Conduct	100% ██████████	Develop and launch a Graduate Trainee program	2016
Develop Job Descriptions for all positions	100% ██████████	Develop and launch a Talent Management Plan	2016
Implement a Performance Appraisal System for all employees	100% ██████████	Conduct a Performance Appraisal for all employees	2016
Conduct an Employee Engagement Survey	0% ▬	Conduct an Employee Engagement Survey	2016
Develop an annual Education & Training Plan based on the Performance Appraisal System	100% ██████████		
		Conduct at least 1 evacuation exercise at our premises	2016

V. Achieving Financial Results

Our Philosophy

We seek to align our continuous support to society with economic development, in order to facilitate a long-term sustainable business and strengthen our presence in the Greek gaming industry.

Therefore, we built our long-term corporate strategy on economic responsibility towards our shareholders, strive to create value to different stakeholder groups and contribute to the country's development and economic sustainability, by utilizing our resources and financial size.

Our Objective

We aim to maintain our leading position in the Greek gaming industry, while achieving positive financial results and contribute to the country's development.

Our Priorities

- We achieve financial results
- We distribute economic value generated to our Stakeholders
- We help our network develop
- We deploy responsibility to our network
- We train our agents and their employees

“We achieve positive financial results for our company & our partners”



V. Achieving Financial Results

1. Financial Results

Your Opinion...

Economic Value

According to a survey conducted to a total of 313 citizens in November-December 2015, **46%** of participants believe that OPAP “returns money to the society”.

Your Opinion...

Distributing Winnings

According to a survey conducted to a total of 313 citizens in November-December 2015, **56%** of participants believe that OPAP “ensures that the winners receive their profits”.

We achieve financial results

The economic development for OPAP, as for any other company, is our primary purpose since it contributes directly and indirectly to the country's economic development.

The main results for the 2012-2015 period are presented in the following table, while additional financial information can be found in our Annual Financial Statements.

Within 2015

- As in previous years, OPAP did not receive any financial assistance from the Government.
- OPAP revised its sales reporting approach to collect, manage and report data, according to a new commercial channel's needs, which was adopted to increase operational efficiency.

Financial Results

	2012	2013	2014	2015
Total equity (million €)	1,162.5	1,125.3	1,235.1*	1,202.8
Total short – term liabilities (million €)	303.9	400.4	457.9*	325
Total long – term liabilities (million €)	264.4	75.6	59.8*	181
Amounts wagered (million €)	3,972	3,711	4,259	4,257
Revenue (GGR) (million €)	1,320*	1,220	1,378	1,400
EBITDA (million €)	674	225	347	377
Net profit (million €)	506	145	195*	211
Corporate taxes (million €)	104	56	68	141
Total taxes (incl. VAT) (million €)	220	442	562	650
Payments to suppliers (million €)	286	295	290	274
Total dividend (million €)	230	182	144	213.6
Cost of employees (million €)	48	55	58	46.1
Prize payouts (%)	67.2	67.1	67.5*	67.1
Payout to players (million €)	2,670	2,491	2,881	2,858
Commissions to network partners (million €)	333	313	359	362.4
Investments (million €)	-	129**	7***	9.6****

*Restated for reasons described within the 2015 Annual Report, available at www.opap.gr.

**Includes the share of OPAP INVESTMENT LTD to the share capital and reserves of HELLENIC LOTTERIES S.A.

***Includes the acquisition of the 90% share of PAYZONE S.A.

****Includes the share capital increase of Horse Races S.A. and the acquisition of the remaining 10% share of PAYZONE S.A.

2. Economic Value Generation

We distribute economic value generated to our stakeholders

We seek to create economic value not only for our shareholders, but also for our other Stakeholders, as it is particularly important during the current challenging economic situation.

Our turnover and operations ensure that we return significant financial resources back to society, towards our players (through payout to lottery and betting winners), our network (through commissions), our shareholders (through dividends), our suppliers (through purchases), our employees (through wages,

benefits and insurance payments) and towards the Hellenic Republic (through its participation and corporate taxes).

Within 2015

- Paid out over **€2,858** million to players.
- Distributed over **€362** million to its network.
- Distributed over **€213** million to its shareholders.
- Paid over **€274** million to suppliers.
- Distributed over **€46** million to employees.
- Paid over **€650** million to Hellenic Republic.
- Utilized over **€9** million in investments.

Economic Value Distribution



*Amount refers to wages, benefits and insurance payments.

**Amount refers to total taxes and participation of the Hellenic Republic.

V. Achieving Financial Results

3. Network Support

We help our Network develop

The current challenging economic situation in Greece makes every effort which facilitates creating direct and indirect job positions and cultivates know-how, particularly important.

Therefore, we strive for our network's commercial success and sustainability, especially for our agents, providing:

- Support in establishing a modern agency.
- Training the employees of the agency.
- Knowledge and know-how.
- IT systems.

We deploy responsibility to our Network

We demand from all our agencies neither to employ any person below the legal work age limit, nor to tolerate or disregard potential physical or other illegal harassment of any kind, exploitation or the forced and coercive labor in any of their facilities (see section II-1 for details).

Within 2015

- We launched two dedicated sections regarding Responsible Gaming and Corporate Responsibility in the OPAPNET portal.
- We developed merchandising guidelines regarding Responsible Gaming materials and monitored their proper implementation.
- We communicated our campaigns within agencies either through consistent merchandising or video displays from the agencies' TV panels.

We train our agents and their employees

We have established and provide various training programs to our agents, which are carried out either at our premises or in broader areas of their agencies, depending on our training plan.

It must be noted that, if deemed necessary by agents, Hellenic Lotteries distributors and sales channels, their respective employees can participate in training programs implemented by OPAP, such as:

- Games rules.
- Responsible gaming.
- Standard operational procedures.

Achievements 2015 and Objectives 2016

WE SAID	PROGRESS	WE WILL	BY
Improve portal for effective and prompt communication.	100% <div></div>	Update the dedicated Responsible Gaming section in the OPAPNET portal with basic principles, respective policies, trainings and contact information.	2016
Ensure effective activation of stores during launch and post-launch periods.	100% <div></div>		
Develop clear merchandising guidelines.	100% <div></div>	Place new communication materials in Points of Sales, according to the merchandising guidelines and the regulator's requirements.	2016
Revise reporting approach to fit the future operational and performance needs.	100% <div></div>	Update performance management blueprint to reflect operational needs and build reporting team to support all channels.	2016

D. Information about the Report

*Welcome to the
8th Corporate
Responsibility
Report of OPAP.*

Within this Report, we display the approaches we have followed and the results we have achieved to support sustainable development and responsible operation.



D. Information about the Report

1. About this Report

Principles of the Report

The Report follows:

- For the structure and content, the guidelines “Sustainability Reporting Guidelines” (publication G4, 2013) of the Global Reporting Initiative (GRI).

- For the presentation of quantitative data, the EFQM’s RADAR Card.

Scope of the Report

The Corporate Responsibility Report:

- Refers to the period 1/1/2015 -31/12/2015 (unless is indicated otherwise in certain points).

- Refers to all activities of OPAP Group of Companies operating in Greece, namely OPAP S.A. and all its subsidiaries, with the exception of OPAP Cyprus LTD, OPAP Sports LTD, OPAP International LTD, OPAP Investment LTD and the affiliated companies (Neurosoft S.A. and Glory Technology LTD), which are only included in financial results.

- Addresses all our operations (design, development, organization, operation, handling and management for Numerical Lotteries, Sports Betting games, Horseracing Mutual betting, State Lotteries and Instant Win games, as well as support services).

Restrictions of the Report

We recognize limitations in the Report (limitations we intend to handle in future publications), such as:

- Setting quantitative targets, in all programs described within this Report.

- Expanding our quantitative measurement system.

- Following external assurance of the Report principles and content.

Data of Report

Aligned with our effort to display more quantitative results, the Report:

- Contains, as a norm, quantitative results for the last three years.

- Contains, as a norm, quantitative data from direct measurements, with exceptions of estimations displayed being clearly indicated.

- Data presented, have been collected internally by respective accountable departments.

Level of Report

The Report is prepared and self-declared to be in accordance with the “Sustainability Reporting Guidelines” (version G4, 2013) of Global Reporting Initiative (GRI), at “Core” level.

Development of Report

The Report has been developed in collaboration with **STREAM Management**



(www.stream-eu.com)

Feedback

Kindly forward your comments, thoughts, remarks or proposals regarding this Report to:

Main symbols

For convenient reading of this Report, please pay attention to the following symbols, which are widely used:



Good Practice...

Indicates examples of good practices implemented by OPAP.



Policy...

Indicates sections from formal corporate Policies.



Did you know?

Indicates information of particular interest.



Your opinion...

Indicates findings from reputation surveys.

Mrs Georgia Lassanianou
Head of Corporate Social
Responsibility Department

OPAP S.A.
Leoforos Athinon 112
10442, Athens
e-mail: g.lassanianou@opap.gr

D. Information about the Report

2. Summary Table

INDICATOR	2012	2013	2014	2015
I. INTERNAL OPERATION				
Quantitative Indicators in the Report (number)	75	NR	130	155
GRI Indicators in the Report (number - full/partially)	13/20	NR	40/20	41/20
Targets in the Report (number)	7	NR	38	30
II. PLAYER PROTECTION				
Legal actions for anti-competitive behavior (number)	NR	NR	0	0
Employees informed about Responsible Gaming (%)	NR	NR	100	100
Agents subjected to awareness raising campaigns (%)	NR	NR	100	100
Points of Sales distributing Responsible Gaming leaflets (number)	NR	NR	4,667	4,599
Outreach of Responsible Gaming campaigns (%)	NR	NR	92	83
Calls made to player help-line (number)	NR	NR	1,006	1,144
III. SOCIETY SUPPORT				
Societal support activities (number)	304	400	250	394
Societal support spending (million €)	16.86	56	48	36
Blood units gathered (number)	NR	NR	182	155
Purchases conducted from local suppliers (%)	NR	NR	98	91
Total CO ₂ emissions (tn)	NR	4,704.9	4,666.5	3,700.6
Electricity consumption (MWh)	1,717.6	6,417.4	6,384.3	4,960.4
Water consumption (m ³)	3,041.2	11,579.2	7,647	10,404
Paper consumption (tn)	NR	24.2	21.9	16.9
IV. EMPLOYEE CARE				
Employees (number)	238	882	650	831
Full-time employees (%)	NR	NR	99.8	97
Women in overall workforce (%)	NR	NR	48	44.6
Accidents (number)	3	9	4	4
Fatalities (number)	NR	1	0	0
Hours of training (hours)	NR	NR	NR	2,967
V. FINANCIAL RESULTS				
Amounts wagered (million €)	3,972	3,711	4,259	4,257
Net profit (million €)	506	145	195	211
Cost of employees (million €)	48	55	58	46.1
Prize payouts (%)	67.2	67.1	67.5	67.1
Payments to suppliers (million €)	286	295	290	274
Investments (million €)	-	129	7	9.6

*All data for 2012 refer only to OPAP S.A., all data for 2013 and 2014 refer to OPAP S.A., OPAP International LTD, OPAP Services S.A. and Hellenic Lotteries S.A.

**Financial results for all years refer to the entire OPAP Group of Companies.

***NR = Not Reported

3. GRI Table

The correspondence between the content of this Report and the Global Reporting Initiative's (GRI G4 version 2013) General and Specific Standard Disclosures, is presented in the following table.

• Coverage of Indicators is characterized as Full (F) or Partial (P).

• General Standard Disclosures of GRI required for "Core" application level are indicated in grey background.

• Material Aspects of GRI for the organization (based on the Materiality Analysis conducted), are indicated in grey background.

• Boundaries of GRI indicators are indicated on the Table.

• No external assurance has been conducted for the Material Aspects.

General Standard Disclosures Table

GENERAL STANDARD DISCLOSURES	REPORT SECTION	COVERAGE/OMISSION	BOUNDARY OF MATERIAL ASPECTS
STRATEGY & ANALYSIS			YES (COMPANY)
G4-1	A	F	
G4-2	A, I-2, II-1, III-1,3, V-2	P	
ORGANISATIONAL PROFILE			YES (COMPANY)
G4-3	C-1, D-1	F	
G4-4	C-3	F	
G4-5	C-1, D-1	F	
G4-6	C-1, C-3	F	
G4-7	C-1	F	
G4-8	C-1, C-3	F	
G4-9	IV-1, V-1,2	F	
G4-10	IV-1	F	
G4-11	IV-2	F	
G4-12	C-3	F	
G4-13	C-1	F	
G4-14	III-3	F	
G4-15	A, D-1	F	
G4-16	C-1	F	
IDENTIFIED MATERIAL ASPECTS & BOUNDARIES			YES (COMPANY)
G4-17	V-1, D-1	F	
G4-18	I-2	F	
G4-19	I-2, D-3	F	
G4-20	I-2, D-3	F	
G4-21	I-2, D-3	F	
G4-22	A, D-1	F	
G4-23	A, D-1	F	

3. GRI TABLE

4. GLOSSARY
5. FEEDBACK FORM

D. Information about the Report

GENERAL STANDARD DISCLOSURES	REPORT SECTION	COVERAGE/ OMISSION	BOUNDARY OF MATERIAL ASPECTS
STAKEHOLDER ENGAGEMENT			YES (COMPANY)
G4-24	I-2	F	
G4-25	I-2	F	
G4-26	I-2	F	
G4-27	I-2	F	
REPORT PROFILE			YES (COMPANY)
G4-28	D-1	F	
G4-29	A, D-1	F	
G4-30	D-1	F	
G4-31	D-1	F	
G4-32	D-3	F	
G4-33	D-1,3	F	
GOVERNANCE			YES (COMPANY)
G4-34	I-3	F	
G4-35	I-1	P	
G4-36	I-1,3	F	
G4-38	I-3	F	
G4-39	I-3	F	
G4-41	I-3	P	
G4-43	I-3	P	
G4-46	I-3	F	
G4-52	I-3	F	
ETHICS AND INTEGRITY			YES (COMPANY, CUSTOMERS, SUPPLIERS)
G4-56	C-1, I-3, II-1, IV-2	F	
G4-58	I-3	P	

Specific Standard Disclosures Table

DMA AND INDICATORS	REPORT SECTION	COVERAGE/ OMISSION	BOUNDARY OF MATERIAL ASPECTS
ECONOMIC			YES (COMPANY)
Economic Performance			Yes (company)
G4-DMA	V-1,2	F	
G4-EC1	V-1,2	F	
G4-EC3	IV-1	P	
G4-EC4	V-1	F	
Market Presence			Yes (company)
G4-DMA	IV-2	F	
G4-EC5	IV-2	P	
G4-EC6	I-3, IV-2	F	
Indirect Economic Impacts			
G4-DMA	III-1,2, V-1-3	F	
G4-EC7	III-1	P	
G4-EC8	III-1,2, V-1-3	F	
Procurement Practices			Yes (company, suppliers)
G4-DMA	III-2	F	
G4-EC9	III-2	F	
ENVIRONMENTAL			YES (COMPANY)
Materials			Yes (company)
G4-DMA	III-3	F	
G4-EN1	III-3	P	
G4-EN2	III-3	F	
Energy			Yes (company)
G4-DMA	III-3	F	
G4-EN3	III-3	F	
G4-EN4	III-3	P	
G4-EN5	III-3	P	
G4-EN6	III-3	P	
Water			Yes (company)
G4-DMA	III-3	F	
G4-EN8	III-3	F	
G4-EN9	III-3	F	
Biodiversity			
G4-DMA	III-3	F	
G4-EN11	III-3	F	
G4-EN12	III-3	P	
Emissions			Yes (company)
G4-DMA	III-3	F	
G4-EN15	III-3	P	
G4-EN16	III-3	P	
G4-EN19	III-3	P	
G4-EN20	III-3	F	
G4-EN21	III-3	P	

3. GRI TABLE

4. GLOSSARY
5. FEEDBACK FORM

D. Information about the Report

DMA AND INDICATORS	REPORT SECTION	COVERAGE/ OMISSION	BOUNDARY OF MATERIAL ASPECTS
Effluents and Waste			Yes (company)
G4-DMA	III-3	F	
G4-EN22	III-3	F	
G4-EN23	III-3	P	
G4-EN24	III-3	F	
G4-EN26	III-3	F	
Compliance			Yes (company)
G4-DMA	III-3	F	
G4-EN29	III-3	F	
Supplier Environmental Assessment			
G4-DMA	III-2	F	
G4-EN33	III-2	F	
SOCIAL			
LABOR PRACTICES AND DECENT WORK			YES (COMPANY)
Employment			Yes (company)
G4-DMA	IV-1	F	
G4-LA1	IV-1	F	
G4-LA2	IV-1	P	
G4-LA3	IV-1	F	
Labor/Management Relations			Yes (company)
G4-DMA	IV-2	F	
G4-LA4	IV-2	F	
Occupational Health and Safety			Yes (company)
G4-DMA	IV-1	F	
G4-LA6	IV-1	P	
G4-LA7	IV-1	F	
Training and Education			
G4-DMA	IV-3	F	
G4-LA9	IV-3	P	
G4-LA10	IV-3	P	
G4-LA11	IV-3	F	
Diversity and Equal Opportunity			Yes (company)
G4-DMA	IV-1	F	
G4-LA12	IV-1	F	

DMA AND INDICATORS	REPORT SECTION	COVERAGE/ OMISSION	BOUNDARY OF MATERIAL ASPECTS
Equal Remuneration for Women and Men			Yes (company)
G4-DMA	IV-2	F	
G4-LA13	IV-2	F	
Supplier Assessment for Labor Practices			Yes (company, suppliers)
G4-DMA	III-2	F	
G4-LA15	III-2	F	
Labor Practices Grievance Mechanisms			Yes (company)
G4-DMA	IV-2	F	
G4-LA16	IV-2	F	
HUMAN RIGHTS YES (COMPANY)			
Non-discrimination			Yes (company)
G4-DMA	IV-2	F	
G4-HR3	IV-2	F	
Freedom of Association and Collective Bargaining			Yes (company)
G4-DMA	III-2, IV-2	F	
G4-HR4	III-2, IV-2	F	
Child Labor			Yes (company, network)
G4-DMA	III-2, IV-2, V-3	F	
G4-HR5	III-2, IV-2, V-3	F	
Forced or Compulsory Labor			Yes (company, network)
G4-DMA	III-2, IV-2, V-3	F	
G4-HR6	III-2, IV-2, V-3	F	
Supplier Human Rights Assessment			
G4-DMA	III-2	F	
G4-HR11	III-2	F	
Human Rights Grievance Mechanisms			
G4-DMA	IV-2	P	
G4-HR12	IV-2	P	

D. Information about the Report

DMA AND INDICATORS	REPORT SECTION	COVERAGE/ OMISSION	BOUNDARY OF MATERIAL ASPECTS
SOCIETY			YES (COMPANY)
Local Communities	III-1-3 III-1-3	F F	Yes (company)
G4-DMA			
G4-SO1			
Anti-corruption	I-3, II-1 I-3, II-1 I-3, II-1 I-3	F P P F	Yes (company)
G4-DMA			
G4-SO3			
G4-SO4			
G4-SO5			
Public Policy	I-3 I-3	F F	Yes (company)
G4-DMA			
G4-SO6			
Anti-competitive Behavior	II-1 II-1	F F	Yes (company)
G4-DMA			
G4-SO7			
Compliance	II-1 II-1	F F	Yes (company)
G4-DMA			
G4-SO8			
Supplier Assessment for Impacts on Society	III-2 III-2	F F	
G4-DMA			
G4-SO10			
PRODUCT RESPONSIBILITY			YES (COMPANY, CUSTOMERS, NETWORK)
Product & Service Labeling	II-2 II-1 II-2	F F F	Yes (company, customers, network)
G4-DMA			
G4-PR3			
G4-PR4			
Marketing Communications	II-2 II-2	F F	Yes (company, customers, network)
G4-DMA			
G4-PR7			
Customer Privacy	II-1,2 II-1,2	F F	Yes (company, customers)
G4-DMA			
G4-PR8			
Compliance	II-1 II-1	F F	
G4-DMA			
G4-PR9			

4. Glossary

Please pay attention to the following, frequently used terms:

TERM	REFERS TO
“Agent”	The individuals associated exclusively with OPAP on activities related to gaming and handle, through their agencies, the placement of the company’s games to the Greek market.
“B-4, II-2 etc.”	The area and section of this Report (e.g. used in the GRI, Global Compact and Stakeholder Tables). For example, the term “II-2” makes reference to area 2 (Responsible Gaming), section 2 (Responsible Advertisement).
“Carbon dioxide”, “CO ₂ ”	The gaseous chemical compound derived from the combustion of fossil fuels (oil, gasoline, natural gas, etc.) and organic compounds (wood, plastic, etc.), which contributes to the greenhouse effect.
“Company”, “we”, “OPAP”	OPAP S.A. and its subsidiaries OPAP Services S.A., Hellenic Lotteries S.A., Horse Races S.A. and Payzone Hellas S.A.
“Corporate Social Responsibility” or “Corporate Responsibility”	The voluntary commitment of companies to include in their corporate practices economical, social and environmental criteria and activities, which are beyond the legislative requirements and are related to their impact on Stakeholders.
“Environmental footprint”	The total greenhouse gas emissions arising directly (e.g. burning of fossil fuels for heating) or indirectly (e.g. by the use of products) from a company.
“Fixed odds betting”	The form of form of wagering against odds offered by a bookmaker.
“Global Compact”	The United Nations Global Compact, an initiative to encourage companies and organizations worldwide to adopt sustainable and socially responsible policies, as well as to report on their implementation, stating ten principles in the areas of human rights, labor, the environment and anti-corruption.
“Group”, “OPAP Group”	The OPAP Group of Companies, which includes OPAP S.A. (parent company) and its subsidiaries OPAP Sports LTD, OPAP Cyprus LTD, OPAP Services S.A., OPAP International LTD, OPAP Investment LTD, Hellenic Lotteries S.A., Payzone Hellas S.A. and Horse Races S.A., as well as the affiliated companies Neurosoft S.A. and Glory Technology LTD.
“Mutual betting”	The form of wagering in which all bets of a particular type are placed together in a pool and payoff odds are then calculated by sharing the pool among all winning bets.
“Player”	The end users of our products and services.
“Sales network”	The Points of Sales of our games.
“Report”	The Corporate Responsibility Report 2015.
“Universal Declaration of Human Rights”	The declaration adopted by the United Nations General Assembly in 1948 and consists of thirty articles, representing the global expression of rights to which all human beings are inherently entitled.

D. Information about the Report

5. Feedback Form

1. To which Stakeholder category do you belong?

- ☐ Employees
- ☐ Suppliers
- ☐ Citizens
- ☐ Network
- ☐ Players
- ☐ State
- ☐ Shareholders
- ☐ Agents
- ☐ Media
- ☐ Local Communities
- ☐ Organizations
- ☐ Industry Associations
- ☐ Regulatory Bodies
- ☐ Other _____

2. What is your impression, about the following areas of this Report?

AREA	EXCELLENT	GOOD	NEUTRAL	MEDIOCRE	BAD
I. Internal Operation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
II. Player Protection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
III. Society Support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
IV. Employee Care	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
V. Financial Results	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3. What is your impression, about the following elements of this Report?

AREA	EXCELLENT	GOOD	NEUTRAL	MEDIOCRE	BAD
Sections have the right balance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Important topics are covered	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Structure supports easy reading	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Texts are comprehensive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Quantitative elements are complete	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Graphs included are comprehensive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Layout is attractive/pleasant	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4. Are there any topics, which are not answered (or not adequately covered) in this Report or do you have questions you would like to be answered in our next Report?

5. Are there any other comments/proposals you might have?

Personal Data (optionally):

Name: _____

Organization: _____

Address: _____

Phone/Fax: _____

E-mail: _____

All information on this form will be used only for evaluating this Report, through statistical analysis. Personal data are protected, as defined by the respective law regarding private information.

Please fill out the form electronically to the company's website or send the form to:

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CORPORATE RESPONSIBILITY REPORT 2015

Data presented within the Corporate Responsibility Report 2015 were gathered in cooperation with all departments of OPAP Group.

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www.thedesigncartel.com



Development of content:
STREAM Management
www.stream-eu.com



