

opap



Code of Conduct

DECEMBER 2024

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OUR MISSION



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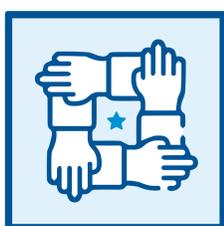
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A message from our Chairman & CEO



Over the past 66 years, OPAP has built a remarkable heritage, as the leading gaming company in Greece and one of the most recognized in the industry worldwide, with an over-arching commitment to delivering best-in-class affordable entertainment in a safe, responsible and sustainable way.

The OPAP Code of Conduct constitutes the foundation of who we are and what we strive to be; a document which reflects our core values and the highest standards of ethical business conduct that we, as ambassadors of OPAP, are committed to uphold every day.

I am confident that this Code of Conduct will effectively serve its purpose and will help us continue fostering a culture that we all enjoy and take pride in.

Thank you all for your unwavering dedication and commitment to OPAP!

Jan Karas

Chairman & CEO of OPAP

Our Values

As the leading gaming company in Greece and one of the most renowned in its industry worldwide, OPAP has a special responsibility to behave towards all Stakeholders (Customers, Society and our People) in a way that is befitting to the Company's long history and well-earned reputation.

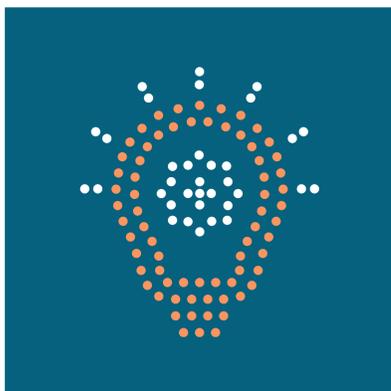
Our Values are at the core of who we are and serve as guidance in everything we do. Having actively involved employees across our Company, we have defined and verified our 3 core Values, as well as the set of behaviors they mean for us:



We do what is right

“We do what is right” means acting with **transparency, integrity, and fairness**, building trust and showing respect to all our **Stakeholders**.

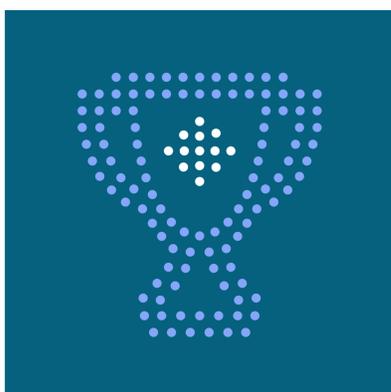
Together, we nurture a culture of **trust & ethical excellence!**



We think differently

“We think differently” means fostering **innovation and creativity** through **open-mindedness, driving change**, and **continuously seeking improvement**.

Together, we design an ecosystem that encourages **breakthrough ideas & bold actions!**



We win together

“We win together” means fostering **teamwork** towards a **common purpose**, **celebrating our victories**, and embracing a **growth mindset** with **agility and empathy** for all.

Together, we create a **supportive & inclusive environment** where everyone thrives!

Our Competency Framework

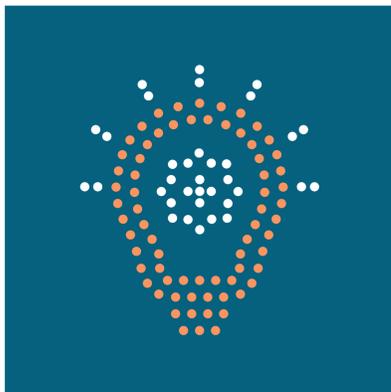
Based on our new Competency Framework, which is in full alignment with our core Values, all OPAP People shall:



Exhibit Responsibility & Accountability

Act with Integrity

Lead By Example



Cultivate Innovation

Embrace Change

Think Strategically



Strive for Self-Development

Collaborate Efficiently

Drive Team Success

What is the Code of Conduct?



This Code constitutes the foundation of who we are and what we strive to be; a living document created to reflect the core principles of ethical business conduct, which are important to us, and which help us establish a rapport of trust, transparency, and accountability among us and towards others.

While it cannot answer all your questions, this Code can come in handy in situations where doing what's right is not clear to you; providing guidance as to what is expected in terms of behavior within and outside the workplace's confines, as well as pointing you to the relevant persons, policies and communication channels for further assistance.

Does the Code apply to you?



From our interns to our Chief Officers, BoD members and every person offering their services on a full/part-time basis to OPAP, **the success of this Code lies in it being embraced by all OPAP People.**

What are the consequences of non-compliance?



We take all actual and potential violations of this Code seriously. Depending on the violation's nature and gravity, **non-compliance with what is hereby prescribed might have repercussions for individuals and OPAP,** as envisaged in the applicable legal framework, Company policies, Labor Regulation and your employment contract.

When in doubt, seek guidance!



If you are in doubt about an action/decision, ask yourself:

- Would it be legal & in line with this Code & OPAP's other policies?
- Would it benefit OPAP?
- Would it reflect well on you/others/OPAP?
- Would you feel comfortable if it was communicated publicly?

If the answer to any of the above is **NO**, seek support/advice from our **Corporate & Network Compliance Team.**

If your concern is related to a Human Resources issue, please contact our **People Team.**

Whistleblowing Policy



At OPAP we are committed to ensuring the highest level of ethical and professional conduct, and, we stand against any illegal or irregular action which might affect our Company's reputation and compliance with its legal and regulatory obligations.

If, in the course of your work, you suspect or become aware of such action, you can report it through the following **internal Reporting Channels**:



our **designated e-platform**, accessible via OPAP's intranet & website,



by **e-mail**, to whistleblowing@opap.gr,



by **post**, to **L. Athinon 112, 10442, Athens**, marked as "To the attention of OPAP's **RAMR**" (Responsible Person for the Acceptance and Monitoring of Reports) or "Report of Law 4990/2022",



directly to the RAMR, upon verbal request for a personal hearing or a written request to the e-mail whistleblowing@opap.gr.

We encourage the eponymous submission of Reports made in good faith, and we protect Reporting Persons from retaliatory measures. We also take appropriate measures to guarantee the confidentiality of every individual involved/named in a Report. All personal data will be processed in accordance with GDPR and pertinent legislation.

At the same time, it is highlighted that **submitting a knowingly false/malicious Report could pose legal hurdles.**



For more information, please refer to our **P195 Whistleblowing Policy** or consult with our **RAMR**.

Our Mission



Personal accountability

We are all ambassadors of the Code's principles and we hold each other accountable for our actions. We pursue what's best for OPAP, acting with honesty and integrity in our dealings.



Compliance with the law(s)

We abide by and promote compliance with the laws, regulations and license obligations that apply to our Company's business activities.



Protection of our assets

Protecting our assets goes hand in hand with preserving and further cementing a brand that we are proud of and identify with, after years of hard work and dedication.



Positive work culture

Diversity, equal opportunities and respect for fundamental human rights are at the forefront of the working atmosphere we strive to create; the physical & mental well-being of our People is just as important.



Commitment to sustainability

We seek to deliver best-in-class entertainment to our customers in a safe, responsible, and eco-friendly way while also giving back to society, especially the younger generations.



Personal accountability



Conflict of interests



Financial integrity



Commercial communication



Social media & other platforms



Prohibition of play



Personal accountability means owning your actions and their results, both positive and negative.

It's a choice, a state of mind and an expression of integrity.

What is expected of you?

When you hold yourself accountable, you are more likely to:



Follow through on your commitments.



Achieve your personal & contribute to your team's goals.



Take responsibility for your mistakes & learn through them.



Earn the trust & respect of your colleagues.



Improve the quality of your work & reap the feeling of satisfaction that comes with it.



Personal accountability comes in different, but equally important shapes.

Failure to act in such manner can not only be detrimental to you personally, but also harm our Company's corporate reputation, expose us to legal threats and affect our ability to retain current or seek new business lines.

Conflict of interests



During work, you may find yourself in a situation where **your personal interests/relationships (could) interfere with your professional duties, and, ultimately, what is best for OPAP.**

Even if there is no actual benefit, this conflict could create doubts as to the impartiality of your judgement and decision-making.

Examples of conflict:

- Professional, financial, or close personal involvement of yourself/a family member, e.g., child, spouse, domestic partner, dependent etc. with an OPAP competitor/supplier/Agent.
- Involvement in the hiring process or performance evaluation of a family member/friend/acquaintance.

What is expected of you?

To put OPAP's interests above your personal/business ones. A conflict situation does not in itself contravene the Code and, in most cases, can be resolved through open discussion. Hence, you are expected to:

Fill in the **"Conflict of Interests" Form**
(upon onboarding, or once a conflict potentially arises)

1

2

Notify your **immediate manager**

Consult with the **Corporate & Network Compliance Director**

3

(IF APPLICABLE)

4

Inform the latter about changes affecting the conflict.



If you have any doubts about a conflict of interests' situation, you can contact our **Corporate & Network Compliance Team.**

For more information on conflict of interest matters regarding BoD & Senior Management Members, please refer to our **P110 Internal Rules & Regulations.**

Financial integrity



As a Company, we are defined by high ethical standards and an acute sense of integrity and responsibility we set upon ourselves. Therefore, **we are firmly opposed to all forms of bribery and corruption.**

GIFTS & HOSPITALITY

In the course of your work you may find yourself in a position to offer/accept gifts & hospitality to/from third parties, business partners etc. Subject to certain conditions, this is viewed as common practice in the business world.

What is expected of you?



In principle, **you are allowed** to occasionally offer/receive a gift:

- **of non-cash nature**, e.g. event ticket, wine bottle etc.,
- **of value <200 EUR**,
- **for legitimate business purposes**, e.g. to foster team-building, recognise exceptional performance, cultivate networking opportunities, and
- **not intended to influence business decisions.**



At the same time, **you are not allowed** to offer/accept any gift:

- of any amount **in cash/equivalent means**, e.g. bank transfer,
- **of non-cash nature with value >200 EUR**, without notification of & approval from the **Corporate & Network Compliance Director**,
- **in exchange of your performance or a third party performance**,
- **during a tender process/contractual negotiation.**



You are also expected to **refrain from unethically using authority, power or financial resources entrusted to you to pursue personal/business goals.**



For more information, you can contact our **Corporate & Network Compliance Director.**

Commercial communication



Our Company's advertising and other public communications shall be legal, decent, truthful and in full compliance with all relevant legal, regulatory, and Responsible Gaming (RG) frameworks.

Our sales promotion activities shall be fair, tasteful, and respectful of our customers' privacy, safeguarding our Company's reputation.

What is expected of you?



Have a proper understanding of our **Commercial Communication policies & procedures**.



If you are **ever approached by press**, ask for the inquirer's name & the organization which s/he works for and kindly refer the request to your **immediate manager**, the **Corporate Communications & Corporate Responsibility Director** and/or the **Public & Media Relations Director**.

Social media & other platforms



In this day and era, we all have access to multiple **social media platforms/apps** for personal and professional purposes. As we daily engage with several (un)intended recipients, it is **extremely important to safeguard the OPAP brand and reputation when using those outlets**.

What is expected of you?



Generally, you should refrain from:

- Making negative comments about our Company, People & practices in external meetings, conferences, social media & other live/recorded appearances.
- Leaking business secrets & other confidential/sensitive information about OPAP's finances, products etc.
- Uploading personal data, photos & other media related to our data subjects (e.g., employees, customers, game-winners, third parties) without their explicit consent.

Prohibition of play



In principle, our People are allowed to participate in OPAP games conducted through the retail network. However, they are not allowed to participate in OPAP games conducted with registration process (e.g., by creation of personal account/issuance of player card).

These include:

- Games of chance provided through PLAY gaming machines (VLTs),
- Online games of fixed-odds betting (PameStoixima & Virtual betting games),
- Online games of chance (e-numerics – e.g., TZOKER, KINO, SUPER3, LOTTO), and
- Online (live & RNG) casino, poker & related games.

In addition to the above, **our traders are prohibited from participating in the fixed-odds betting games conducted through our retail network (land-based PameStoixima).**

Persons holding a **Suitability License** in accordance with Suitability Regulation, performing key functions at OPAP (BoD members, Chief Officers, Head of Internal Audit, AML Officer etc.) **are not allowed to participate in any game conducted by the Company.**

What else is expected of you?



If you are aware of or, due to your job tasks, have access to confidential information about betting, you are expected to **avoid sharing such information with third parties.**



For more information about prohibition of play, please refer to our **P113 Online Blacklist & P156 VLTs Blacklist Processes** or contact our **Corporate & Network Compliance Team.**



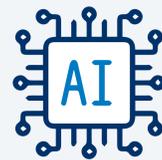
Compliance with the law(s)



Competition



Data protection (GDPR)



Artificial Intelligence (AI)



Tax compliance



Anti-money laundering (AML)



Cooperation in State investigations



We honor and obey the law, as illegal practices can severely damage our Company's hard-earned reputation, partnerships, and finances.

Our **Team of Legal professionals** regularly monitors our compliance with the current and up-coming legal and regulatory requirements through a robust set of controls, raising awareness and cultivating a compliance culture within OPAP.

Nevertheless, it is important for **every member of our team** to have at least a high-level understanding of the expectations and risks at hand, and comply with the legal and regulatory framework related to their duties.

Competition



We abide by all national and EU antitrust, competition and state aid laws and regulations that apply to OPAP, and we do not wish to gain any competitive advantages through illegal or unethical business practices.

What is expected of you?



To avoid any (in)formal arrangement that shows convergence of our Company's with our competitors' interests, namely:

- Agreeing to fix the price of our products/services.
- Agreeing to share the market by dividing customers/geographic regions.
- Exchanging sensitive information (i.e., present/future prices, costs, sales volumes); this also applies to communications between **our separate exclusive (retail & numeric online) and non-exclusive (online) business departments**.



Competition law violations could result in substantial fines by the competent authorities (**up to 10% of the OPAP Group's annual turnover**).



For more information, please refer to our **P183 Competition Policy** or contact our **Legal Affairs & Competition Team**.

You may also refer to our **P184 Dawn Raid Process**, for guidance on unannounced on-site investigations conducted by competition law authorities (DG Competition & Hellenic Competition Commission).

Data protection (GDPR)



In the course of your work you might need or have access to data of OPAP employees, partners, customers etc. Their private or professional life might depend on the information entrusted to you, and undertaking every effort to protect it should always be your priority.

Importantly, OPAP reserves the right to publish non-personal information about the winning slips - e.g., location, amount won etc.

What is expected of you?



Know your data: Know which personal data you are processing & understand its nature.



Exercise data minimization: Avoid asking for/processing personal data that is not necessary for your work.



Protect our customers & game-winners' personal data, by implementing appropriate measures laid down by OPAP.



Unless legally required, **avoid sharing personal data** via oral, written or other (e.g., social media) means.



Immediately notify the Data Protection Officer in case of a (suspected) data breach.



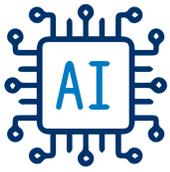
Breaching personal data provisions may lead to significant reputational harm and fines for OPAP (**up to 4% of the OPAP Group's annual turnover**).



For more information, please refer to our **P351 Data Protection Policy** and the respective **CD104 Privacy Notice**.

Additionally, you can send us your query via dpo@opap.gr.

Artificial Intelligence (AI)



Emerging technologies are nowadays regulated to ensure, *inter alia*, that there are no undesirable ethical consequences in a workplace or an interference with the fundamental rights of employees, customers etc.

In compliance with this novel legal framework, **we maintain an electronic Registry of all AI applications used at OPAP**, e.g., for consumer profiling, employee evaluation purposes.

What is expected of you?



Develop & use AI apps in accordance with applicable laws/policies, as well as ethically, eliminating any discrimination, inequality or bias.



Prioritize using OPAP-provided AI apps (e.g., Microsoft 365 Copilot) for generating business outputs.



Refrain from uploading Company data, documentation etc. in publicly available AI apps (e.g., Chat GPT).



Consult with the Data Protection Officer, before developing AI apps involving personal data processing.



For more information, please refer to our **P122 Artificial Intelligence Code of Conduct**.

Tax compliance



By paying taxes, adopting proper processes related to tax clearance and having the right mechanisms in place, OPAP constitutes an important contributor to the economic growth of Greece.

With the help of our tax experts and highly qualified personnel, **our Company remains fully compliant with all applicable tax laws and regulations, engages in accurate and transparent financial reporting, and cooperates with the tax authorities.**



For more information, please refer to our **P110 Internal Rules & Regulations**.

Anti-money laundering (AML)



We want to make sure that our operations are not being leveraged for the purposes of channelling funds of illicit origin towards the legal economy.

Thus, we undertake every effort to prevent money laundering activities within our sphere of influence, making use of appropriate structures and mechanisms which include: **a tiered due diligence system, monitoring and assessment of suspicious/unusual transactions and gaming activity, compliance monitoring and employee training programs.**

What is expected of you?



If you are aware of or suspect any money laundering/financially complicit activity, please contact our **AML Compliance Officer**.



For more information, please refer to our **P130 Policy on Anti-money Laundering and Countering Terrorist Financing (AML/CTF)** and **P153 Policy on Granting Winnings Certificates**.

Cooperation in State investigations



At OPAP we are committed to cooperating with appropriately conducted state inquiries and investigations, and we advise our People to always provide full & truthful information to the competent authorities.

What is expected of you?

If a State/regulatory authority requests you to:

- Testify or otherwise participate in an ongoing investigation, or
- Provide physical evidence/material (e.g., corporate documentation),



Notify the Chief Legal, Regulatory & Compliance Officer, prior to proceeding to any action.



Protection of our assets



Intellectual property (IP)



Confidentiality



Inside information (insider trading)



Information security



Physical assets

Protection of our assets



The buildings we work in, the technology that connects us to others, the ideas and materials we develop, the computers, mobile devices and vehicles we use for our daily tasks constitute **OPAP assets entrusted to us for business purposes only** (unless otherwise authorized). Hence, it is **everyone's duty to protect them**.

Intellectual property (IP)



All materials and works created and/or developed during your occupation at OPAP belong exclusively to the Company. The same applies to all related IP rights, whether registered or not and for their whole term of protection under applicable laws.

These are distinguishing features of the OPAP brand, and **it is everyone's responsibility to safeguard and promote them**, while respecting the proprietary assets of others/competitors.

Examples of intellectual & industrial property rights:

- Software
- Source codes
- Databases & documents
- Trademarks & patents
- Designs
- Domain names

What is expected of you?



Maintain the integrity of OPAP IP assets you are responsible for/have access to; avoid copying, reproducing, uploading, tampering with or otherwise disclosing OPAP IP rights without the Company's knowledge & permission.



Refrain from using third parties' IP material without proper authorization/licensing.



Promptly report to your **immediate manager** any situation/incident that could lead to the **misuse, loss, damage or violation of the OPAP IP assets**.

Confidentiality



Whether related to our Company's interests and practices or entrusted to us by third parties, **any information that has not been publicly disclosed is confidential and should be treated with utmost diligence.**

Examples of confidential information:

- Financial data (turnover, profits, projections etc.)
- M&A projects
- Operation manuals, know-how & trade secrets
- Marketing & corporate strategies
- All types of contracts (employee, supply, partner, real estate etc.)
- Communications (e-mail correspondence, text messages etc.)

What is expected of you?



Avoid disclosing confidential information, unless legally required.



Avoid sharing your corporate credentials (username, password, office card, desk keys etc.).



Lock your corporate devices, if you leave them unattended even for a short period of time.



Turn off your computer & clear your desk when leaving for the day.



Check for documentation left in printers.



If in doubt, consider the information entrusted to you as confidential.



For more details regarding the classification of information, please refer to our **P303 Asset Management Policy**.

Inside information (insider trading)



While at OPAP, you may come across sensitive information (in)directly related to the Company, its financial instruments (e.g., shares, bonds) or their future value.

This kind of information is deemed as “inside information”, if:

- it is of **precise nature**,
- it has **not been made public** through appropriate & lawful channels; and
- if made public, it could have a **significant effect on the price** of those shares/bonds or related derivative financial instruments,

meaning a reasonable investor would be likely to use this information as a basis for her/his investment decisions.

What is expected of you?



During your occupation at OPAP (and/or after your departure) you are expected to **avoid**:

- **Buying/selling OPAP financial instruments on the basis of inside information**, for your/a third person’s account.
- **Passing on inside information to third parties or inducing them to trade based on such information**; take extra care when discussing with representatives of other companies in social, trade etc. events.



If you are a **person discharging managerial responsibilities** (e.g., BoD/Audit Committee member/senior executive), you are expected to:

- **Notify OPAP and the competent authority of every transaction conducted on your own account relating to Company shares**; the same obligation applies to persons closely associated with you (e.g., spouse, children etc.).
- **Refrain from buying/selling OPAP financial instruments during the “black-out” period** (i.e., 30 days prior to the announcement of the Company's periodic financial results).



You are also expected to promptly address insider trading/unlawful disclosure/market manipulation concerns with the **Chief Legal, Regulatory & Compliance Officer** or the **Investor Relations Team**.



For more details, please refer to our **P169 Handling of inside information and the prevention of market abuse Policy**.

Information security



Whether in electronic, print, or other form, **every piece of corporate information is an OPAP asset**, which we shall always strive to make proper use of, protect, and not leverage for personal/other purposes.

While technological protection measures are in place, our People remain the last line of our team's defense. Hence, it is crucial that everyone is informed and trained to identify and timely report potential risks, phishing attempts etc.

What is expected of you?



To remain cautious about (potentially) suspicious correspondence, e.g., e-mails, phone calls, SMS & equivalents (Viber, WhatsApp etc.). You are advised to:

- **Validate the caller's/sender's credentials** (e.g., name, phone number, e-mail address).
- **Check correspondence for typos/suspicious labels** (e.g. "URGENT").
- **Think before you click!** Check who is sending the correspondence and why, before opening an attached file/link.



In addition, you are expected to **participate in our cybersecurity training sessions**, to make sure you remain up to date on relevant matters.

If you are aware of/suspect an information security risk, you shall **promptly report** it via:



210-5798420 (ext.) or 7555 (int.)



itsec@opap.gr, it.support@opap.gr or abuse@opap.gr

Physical assets



From office badges to electronic devices, company cars and OPAP's corporate premises, **these are all physical assets that belong to the Company and are provided to you to facilitate your work.**

What is expected of you?



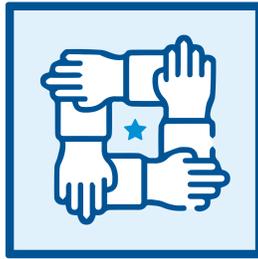
Make proper use of the physical assets granted/accessible to you due to your role.



In the event of (or potential) loss, damage, destruction, theft etc. of any physical asset, report this to the **People Team** and/or your **immediate manager**.



If you have questions about any OPAP asset please contact our **People Team** (physical assets) and/or **Corporate IT Support & Cyber Security Teams** (digital assets).



Positive work culture



Diversity, inclusion & equal opportunity



Anti-violence & anti-harassment policy



Zero tolerance on forced & child labor



Health & Safety

Positive work culture



A positive work culture doesn't just happen. It takes a lot of thought, effort, and cultivation from every team member on a daily basis. It is also one of the key drivers of a company's success. Therefore, **at OPAP we place a huge emphasis on creating and sustaining a positive working environment for our People.**

Diversity, inclusion & equal opportunity



Understanding and appreciating the uniqueness of every individual in our workplace is a top priority at OPAP. Thus, **we are committed to promoting equal treatment and providing employment opportunities for everyone**, irrespective of e.g., gender, age, nationality, ethnic origin, religion, sexual orientation or physical ability; our hiring and promotion criteria depend exclusively on skills, qualifications and contribution.

Anti-violence & anti-harassment policy



We believe it is very important to show the utmost respect for human dignity and behave in a respectful, decent manner towards each other at all times. Hence, **we are strictly opposed to any word or action that could jeopardize the physical, emotional or sexual integrity of our People.**

What is expected of you?



Avoid any conduct that could harm/offend/humiliate a colleague, irrespective of position (e.g., senior/junior level).



If you fall victim/become aware of such conduct, you are encouraged to submit a report according to the **P186 Internal Complaints Management Procedure regarding violence and harassment incidents**. If you need guidance for matters related to the prevention and handling of workplace violence and harassment, you may consult with the People Team Director.



For more information, please refer to our **P185 Workplace Anti-violence and Anti-harassment Policy**.

Zero tolerance on forced & child labor



Our Company bears a moral and legal responsibility to protect the fundamental human rights of every person associated with our operations.

As part of our commitment to this mission, **we adopt a zero-tolerance approach towards all forms of forced & child labor, and we are firmly opposed to the imposition of exploitative working conditions** (e.g., coercion, deception, threat etc.)

Health & Safety



Providing a healthy and safe working environment is one of our highest priorities, as it can help bring the best out of every member of our team.

To this end, we implement an **ISO45001 certified Occupational Health & Safety (H&S) Management System**, based on:

- **Compliance with all applicable H&S laws, regulations and standards,**
- **Risk assessment to identify, update & where required, mitigate work-related hazards,**
- **Prevention of work-related accidents/injuries/illness** – e.g., an occupational doctor & a fully equipped medical room are daily available in our offices,
- **Initiatives to raise awareness & cultivate a positive attitude on H&S issues** (on-site & at-home) – e.g., Employee Assistance Program (EAP), TownHall Talks etc.,
- **Promotion of work-life balance** - e.g. we provide a state-of-art gym facility in our HQs & various wellness activities to our People (e.g. Yoga & Pilates sessions), and
- **Open & bilateral communication** with all stakeholders on H&S issues, including regular consultation with our employees.



For more information, please refer to our **I114 Employees Health & Safety Management** and **P108 Occupational Health & Safety Policy** or consult with our **People Team**.



Commitment to sustainability



Partnering for impact



Empowering our People



Protecting our players



Respecting the environment



In line with the respective ESG framework of Allwyn Group, OPAP's Sustainability Strategy aims to balance purpose with profit, and the demands of employees, customers, and society with the shareholders' needs.

Underpinned by a robust governance and a pervasive compliance culture, **our Sustainability Strategy focuses on 4 key priorities**, which collectively ensure that sustainability opportunities and risks are effectively identified, assessed, managed, monitored, and reported upon.

Partnering for impact



We believe that our role in society transcends our business activities, making it our responsibility to support social growth and prosperity.

Our CSR strategy focuses on health, employment, sport, and sensitive social groups. With these in mind, we carry out significant CSR initiatives which contribute to the wellbeing of the communities we work in. Those initiatives reach thousands of people nationwide and have the common objective of catering to the needs of our society and, even more so, the younger generations.

In parallel, possessing one of the largest exclusive commercial networks in Greece, at OPAP we bear the responsibility to systematically disseminate, deploy, and promote sustainability principles throughout our supply chain.

We also remain committed to maintaining our strong position in the Greek gaming market, exploring opportunities for growth through upgrading our customers' entertainment experience.

Empowering our People



Achieving our strategic objectives requires a work environment that is engaging and empowering. **Our People and the way they work together are our Company's most valuable assets and therefore, we are committed to caring for those who make our success possible.** Our approach in developing our People is focused on the following key principles:

- Attracting and retaining talent to ensure a dynamic & engaged workforce.
- Providing new opportunities for training & development.
- Promoting the principles of diversity, equality, inclusion & respect for human rights.
- Ensuring the health, safety & wellbeing of our People.

Protecting our players



We understand the possible risks and consequences intertwined with participating in the games of chance conducted by our Company, and for that reason **we are committed to protecting our players and enforcing RG principles.**

As reflected in our **P131 Policy on Responsible Gaming, protecting vulnerable groups (e.g., self-excluded and under-aged players) and preventing excessive play is at the heart of our strategy.** At the same time, we seek to establish an environment where a fair, reliable, and safe gaming experience is provided to the people that use our products/services for their entertainment.

Respecting the environment



Conscious of global environmental issues, we comply with relevant legislation and provisions, conduct environmental impact assessments as needed, adhere to our **P106 Environmental and Energy Policy**, ensure that our operations follow a certified Environmental Management System and promote several initiatives aimed at minimizing our environmental footprint.

