

INTEGRATED ANNUAL REPORT
2018



CELEBRATING THE PAST
SHAPING THE FUTURE

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A. Messages from the Chairman and the CEO

MESSAGE FROM THE CHAIRMAN

Dear shareholders and stakeholders,

It is a great pleasure to present to you OPAP's integrated report for 2018, a historic year for our company, which marked 60 years since its establishment. For all of us at OPAP, this anniversary was an opportunity to honour our rich history, as well as to focus on our exciting present and promising future.

In this framework, this publication presents OPAP's progress and outlines our key achievements at a business, operational and sustainability level in 2018. It also gives insight into all the issues of material importance to OPAP, as well as our forward-looking strategy, thus serving as a platform of accountability and engagement with our stakeholders.

At OPAP, we are pleased that our anniversary year was a year of strong financial performance, with multi-year highs in revenue and profitability. This was largely driven by the rising contribution of new products and activities, such as our VLTs network, which is maturing through multi-million investments by OPAP and its partners, while creating thousands of new jobs and dealing a significant blow to illegal gambling across Greece.

Overall, the significant investments and numerous activities undertaken by OPAP, fully reflect our standing commitment to generating long-term value for the company, the economy and society as a whole. This commitment is at the heart of everything we do and has enabled OPAP to establish itself as an iconic Greek company, with international recognition, and a responsible and credible partner of society.

On this basis, we recognize that we must play a positive social role, addressing our stakeholders' expectations and even going the extra mile. Our comprehensive Corporate Responsibility program supports Greek youth – the country's most valuable asset – focusing on the pillars of Health, Sport and Employment, through ambitious initiatives. These include the full renovation of Greece's two largest children's hospitals, the innovative OPAP Sports Academies program, and the OPAP Forward program that fosters growth and employment.

Setting sight on OPAP's future, our goal is to continue pursuing robust financial results and delivering on the highest standards of corporate governance, ethical leadership and corporate citizenship. Combining business excellence with a high sense of social responsibility will serve as our guide for a strong future.

In closing, I would like to thank all the members of the OPAP team for their professionalism and drive to ensure OPAP's success for yet another year. I would also like to thank our shareholders, our stakeholders, our agents and business partners for their support.

Thank you,

Kamil Ziegler
Executive Chairman



OPAP'S 60TH ANNIVERSARY WAS
AN OPPORTUNITY TO HONOUR
OUR RICH HISTORY AND FOCUS
ON OUR PROMISING FUTURE.

MESSAGE FROM THE CEO

Dear shareholders and stakeholders,

In a rapidly changing business environment, a company reaching 60 years of history is a significant accomplishment. Without question, OPAP's 60th anniversary was an important milestone, as we celebrated our legacy and the significant role that we continue to play in Greek economy and society. 2018 was also the second full year in the implementation of our 2020 Vision. Personally, I feel a great honour and responsibility to be serving as OPAP's Chief Executive in this important period for the organisation.

Overall, in 2018, we made major steps towards realizing our ambition to establish OPAP as a world-class gaming entertainment company, making progress across all of our strategic priorities. As you will see in our Integrated Report, OPAP demonstrated the ability to generate solid financial results, while implementing projects that reshape its identity and offering. This makes us confident that an even brighter and stronger future lies ahead for OPAP.

The completion of our technology transformation project was undoubtedly a major achievement. We installed over 50,000 new devices across our retail network, leading to operational improvements and significant benefits for both OPAP and our agents. In the same framework, we continued modernizing our network, opening more than 500 new stores within 2018.

Besides, our young VLT business delivered encouraging growth, with the roll-out advancing and the customer base increasing. In the online market, we have a dual strategy, focusing on both OPAP's online platforms and our investment in Stoiximan Group. Other notable achievements include the development of our Tora business, which offers complementary financial services, the launch of new product derivatives, such as KINO Sidebets, and the growing penetration of Self-Service Betting Terminals (SSBTs) in Greece and Cyprus.

Moreover, our commitment to our communities stands at the highest level. In 2018, we received the top certification (Level 4) of the World Lotteries Association for our Responsible Gaming strategy and continuous improvement activities. Furthermore, OPAP's social contribution initiatives, which stand beside Greece's younger generation, are considered a benchmark for Corporate Responsibility. We are proud of these achievements and we will continue with the same dedication and projects that bring positive change.

To conclude, we believe that 2018 was a year of both meaningful growth and genuine transformation for OPAP. In particular, I would like to express my sincere gratitude to the wider OPAP team, including our employees, our agents, and all our business partners. Thanks to their hard work and collective efforts, we delivered our key objectives and remain well placed to achieve further growth in 2019 and beyond, which is the next step towards implementing our 2020 Vision.

Thank you,

Damian Cope
Chief Executive Officer



2018 WAS A YEAR OF BOTH
MEANINGFUL GROWTH AND
GENUINE TRANSFORMATION
FOR OPAP

B. At a Glance



Who we Are

OPAP Group is the leading gaming organization in Greece and Cyprus, and progressively strives to become a world class gaming entertainment company. In 2018, we achieved some highly prosperous and promising results, with our most notable depicted below.



60 YEARS

of operation in Greece



70% SHARE

of the total Greek legal gaming market

We hold an
EXTENSIVE GAMES PORTFOLIO
with a number of betting & numerical games



€ 2.2 BILLION

total effect in Greece's GDP

OPAP's gross revenue corresponded to

1.2% OF GREECE'S GDP



> €100 MILLION

invested in OPAP's technology transformation program in Greece

FOR EVERY €1

of gross revenue from OPAP Group's gaming and betting services, Greece's GDP is increased by

€1.91



€1.1 BILLION

total effect in Greek state taxes

1 JOB

position in OPAP and its network in Greece sustains

2.3 JOB POSITIONS

in the Greek Market

1 JOB

position in OPAP sustains

31 JOB POSITIONS

in the OPAP's network and the Greek Market

99.3% OF THE COMPLAINTS RECEIVED

from agents and players in Greece were resolved

>60 AWARDS

received in

- Marketing and communications
- Social and digital media
- Design and architecture
- Sales and retail practices
- Investor Relations



Achieving Financial Results



€143.3 MILLION

net profits



€191.5 MILLION

cash position



€353.6 MILLION

EBITDA



€1,547 MILLION

Gross Gaming Revenue



>€4,556.8 MILLION

distributed in economic value



69.5%

prize payouts (excluding VLTs)



€380 MILLION

distributed to our
network partners



€2,843 MILLION

paid to players



€72.8 MILLION

paid for employees



€282 MILLION

paid to suppliers



€723 MILLION

paid to the Hellenic Republic



€130 MILLION

distributed to shareholders



Protecting our Players

65% OF PEOPLE

believe that OPAP
“promotes responsible
participation in games
for money”



100%

of OPAP sales agents
were briefed on
Responsible Gaming



Briefed and trained

**ALL OF OUR
EMPLOYEES**

in Greece about the Responsible
Gaming principles and rules

**> 4,700
MYSTERY SHOPS
VISITS**

to our network
in Greece and Cyprus



LEVEL 4

WLA Responsible Gaming
Certificate awarded to OPAP S.A.



**100%
AGENCIES
& PLAY STORES**

distribute information material
regarding Responsible Gaming



0 CASES

of non-compliance regarding
advertising and marketing
communications, product and
service information and labeling



We support the

PHONE LINES

in Greece (1114) and Cyprus (1444)
to support people dealing with
addiction to gaming

Created a Data Protection Office
and appointed a Data Protection
Officer, in view of entry into
force of the General Data
Protection Regulation

GDPR



0 LEGAL ACTIONS

on behalf of players
regarding credibility of draws



Enhancing our Network



4,111

OPAP stores in Greece and Cyprus



351

OPAP Play stores



8,503

Hellenic Lotteries' points of sale

18,944 VLTs

have been installed
in 351 Gaming Halls
and 1,915 OPAP stores



6,145 SSBTs

operating in OPAP Stores
in Greece and Cyprus



8,787 NEW

Apollo terminals

3 NEW TYPES
OF STORES

- Proto
 - Mega Play
 - Block
- were launched



> 42,000
ONE-TO-ONE

meetings with our agents
in OPAP stores and Play stores

> 5,500 OPAP
STORE AGENTS

and staff, Hellenic Lotteries'
distributors, street vendors,
and Account Managers were
trained



98%
SATISFACTION

rate from classroom training
sessions conducted for our sales
network partners

1,800
PARTICIPANTS

in the new advanced
training program for Play Store
partners, operators & employees

A NEW REWARD
SCHEME

has been developed to reward
our top-performing network
partners in Greece

Developing our People*



1,493 EMPLOYEES

at OPAP Group



40% WOMEN

in total workforce



78% EMPLOYEES

between 30 and 50 years old



97% EMPLOYEES

with full-time contracts



66% EMPLOYEES

with TEI / University education



98% EMPLOYEES

in Greece



171
NEW EMPLOYEES

hired



5.31%

employee turnover



85% EMPLOYEES

received training



23 AVERAGE
TRAINING HOURS

per employee



99% EMPLOYEES

received a formal
performance review

0 COMPLAINTS

regarding labor practices
or discrimination incidents or
unfair treatment or human
rights violation

Supporting our Society



€24 MILLION

invested towards society support and sponsorship of sport



>360 ACTIVITIES

supported through our societal support program

> 1.4 MILLION PEOPLE BENEFITED

from OPAP's societal support program



58%

of people asked identified OPAP as the most recognized company in Greece in terms of social support activities

> € 150,000

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



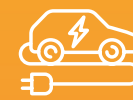
93%

local suppliers



ISO 50001

Energy Management System certification for OPAP S.A.



5,334 MWh

vehicle fleet consumption



4,261 MWh

electricity consumption*



8% REDUCTION

of OPAP S.A.'s annual paper consumption



156 TONS

of office and commercial paper recycled



26,197 UNITS

IT hardware and equipment recycled

C. Who we are

IN THIS SECTION

1. Our Company
2. Our Industry
3. Our Games Portfolio
4. Our Technology Capabilities

C.1 Our Company

OPAP is the leading gaming company in Greece and Cyprus and the exclusive operator of all Numerical Lotteries, Sports Betting games and Horseracing Mutual betting. The company was established in 1958 and was listed in the Athens Exchange in 2001. OPAP is also the exclusive operator of the Passive Lotteries and Instant Win Games (SCRATCH), as well as Video Lotteries Terminals ("VLTs") in Greece. Additionally, through Tora Direct and Tora Wallet, OPAP offers financial services.

OPAP Group of Companies

Company	Holding	Country of Incorporation	Main Activity
OPAP S.A.	Parent company	Greece	Numerical, lottery games and sports betting
OPAP Cyprus LTD	100%	Cyprus	Numerical and lottery games
OPAP Sports LTD	100%	Cyprus	Sports betting
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
Tora Direct S.A.	100%	Greece	Payment services
Tora Wallet S.A.	100%	Greece	Provision of financial services
Horse Races S.A.	100%	Greece	Horse races, mutual betting on horse races
Neurosoft S.A.	67.72%	Greece	Provision of software services
TCB Holdings LTD	36.75%	Malta	Online betting

Shareholder structure on 31.12.2018

Our shareholder structure consists of 319 million common registered shares listed in the Athens Exchange with a par value of €0.30 per share.



33

Emma Delta
Hellenic Holdings Limited

67

Remaining Free Float



C.1.1 OUR BRAND

In 2018, OPAP brand celebrated 60 years of presence in the Greek market, establishing itself as one of the biggest and most historic companies in Greece. OPAP deployed a 360° program, spreading entertainment across Greece, including multiple city interventions and modern sponsored events, while creating a common communication language for its games, concluding the year with a Good-Cause Gala event as part of its celebration for its 60 year anniversary. As a trustful organization, OPAP initiated, for the first time, an open dialogue with its customers via the “mathetonopap.gr” initiative. It included an interactive web-platform designed to answer any of the public questions regarding OPAP’s operations, games mechanisms and payouts, among others.

OPAP “Live the Game”

In order to further capitalize on our brand, we created in 2018 over 20 original games campaigns that reflected our brand’s values, signed by our brand slogan “Live the Game”.

We organized 5 unique entertaining city interventions that turned the city of Athens into an entertainment playground. Indicatively:

- “Walk on water”, where we asked people to literally walk on a liquid resembling water.
- “Pianos in the city”, where we let the creative by-passers express themselves through music in multicolor OPAP branded pianos.
- “Laser football”, where we let our target group play, for the first time, in a 3-a-side football tournament on a white pitch with laser formed lines.
- “Hopscotch at pavements”, where commuting on foot has never been the same with colorful hopscotch drawn in pavements in areas with high traffic.
- “Surprise lines in the city”, where we drew colorful lines in the most iconic square of Athens and led our customers to unique experiences such as VR sessions and colorful candy floss.

Our new sponsorship program included 16 activations across 9 different cities, reaching out to more than 155,000 people. On social media the respective campaign reached 1.8 million views on post-event videos and achieved 30,000 reactions on 82 relevant posts.



C.1.2 OUR REGULATORY FRAMEWORK

Similar to most European countries, the Greek gaming sector is regulated and controlled by an independent administrative authority, the Hellenic Gaming Commission (HGC).

HGC's objectives are to regulate and control the gaming sector and set the standards to ensure that gaming and betting within Greece are organized and conducted in a lawful, transparent and fair manner, are not subject to illegal activities or exploitation, and the interests of players and society are instead of is protected.

Activities of HGC are conducted within a series of regulations that either refer to the overall gaming sector (e.g. Decision no. 129/2/07.11.2014, as currently in force, Decisions no. 155/6/24.04.2015, 163/6/09.07.2015, 166/5/23.07.2015 in accordance with Law no. 4557/2018, as amended by Law no. 3932/2011, concerning tackling money laundering and terrorism financing), or relate to specific games or gaming category.

Gaming Concession

In 2000, we entered a 20-year concession agreement with the Hellenic Republic and have been granted the exclusive right to conduct, manage, organize and operate numeric, sport forecasting and betting games by any appropriate means relevant to the current technology. The agreement was extended in December 2011 and is valid until October 12, 2030 except for PAME STOIXIMA and MONITOR GAMES, for which OPAP has the 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 the exclusive right to operate and manage any new sports betting games in Greece as well as a right of first refusal to operate any new games permitted by Law.

Lottery Concession

The Lottery Concession, which was ratified by Law no. 4183/2013, entitled OPAP to exclusively operate Hellenic State lotteries.

VLT License

According to the provisions of Article 39 of Law no. 4002/2011, we initially held an exclusive 10-year license to install and operate 35,000 Video Lotteries Terminals (VLTs) in Greece, out of which 16,500 would have been installed and operated directly by OPAP through its network, while 18,500 would have been operated by concessionaires, to which OPAP would have conceded, against consideration and following an international tender, the right to install and operate them.

However, following an amendment on November 2017, by virtue of the provisions of Chapter A, Part B' of Law no. 4499/2017, the number of VLTs was reduced to 25,000 self-operated machines and the VLTs license duration was extended to 18 years, starting from January 2017, while also indicating OPAP's obligation to ensure deployment of all VLTs until 31 December 2019.

The HGC issued the Decision no. 225/2/25.10.2016 (GG 3528 B' 01-11-2016), regarding the installation and operation of VLTs.

Horse Racing Concession

After abiding to all terms and conditions provided on the Accession Agreement between Hellas Horse Races S.A. and Hellenic Republic Asset Development Fund, the company holds the exclusive right to organize and conduct terrestrial and online horseracing mutual betting in Greece for 20 and 5 years respectively, with its horse racing operations commencing in January 2016.

Online Gaming

The gaming concession entitles OPAP to exclusively conduct online gaming in Greece. HGC has the authority to blacklist any illegal operators and ban online access through local ISPs (Internet Service Providers). The preliminary framework for online gaming licensing was set up in 2011 and does not affect the exclusive games offered by OPAP.

OPAP is also supervised by a three-member Supervisory Committee, which is established by the provisions of Article 28, paragraph 3A of Law no. 4002/2011, in order to ensure that OPAP and its agents 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 crimes 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.

C.1.3 MEMBERSHIPS

OPAP Group companies participate in a number of organizations and committees, relevant to their operation.



Organizations

World Lottery Association (WLA)
European Lotteries Association (EL)
Hellenic Federation of Enterprises (SEV)
Hellenic Network for Corporate Social Responsibility
European Pari Mutuel Association (EPMA) (Horse Races)
Global Lottery Monitoring System (GLMS)
Hellenic Institute of Customer Service
Hellenic Institute for Entrepreneurship & Sustainable Development



Working Groups

World Lottery Association Security and Risk Management Working Group
European Lotteries Public Affairs Coordination Working Group (ELPAC)
European Lotteries Sport Working Group (EL Sport)
European Lotteries Security and Integrity Working Group



C.1.4 RECOGNITIONS

In 2018, we received more than 60 awards, in categories including CSR, marketing and communications, social and digital media, design and architecture as well as sales and retail practices. We have gained great brand recognition through our performance, contributing as well in the increase of team morale and customer attraction.

Award Event/ Awarding Authority	Type of Award/ Distinction	Category	Reason
World Lottery Association Summit Advertising Awards	Best product advertisement broadcast on TV Grand global advertising award	Games advertising Corporate advertising	SCRATCH 1M - "Can you handle the thrill?" Mr. Opap - "Live the Game"
Ermis Advertising Awards	Gold award Gold award	Outdoor advertising TV advertising	SCRATCH Magic Cherries - Attica Stores Window PAME STOIXIMA - "Remorses"
Sports Marketing Awards - Boussias Communications	Gold award	Original content / reporting	Vasilis Chatzipanagis interview
	Gold award	Use of creative media	Video with Love songs for Saint Valentine's day with athletes
	Gold award	Digital / social media	Video with Love songs for Saint Valentine's day with athletes
	Gold award	Integrated marketing campaign	OPAP's campaign with Nick Galis promoting wheelchair basketball
Ermis Media Awards - Hellenic Association of Advertising and Communication Agencies -	Gold award	Clubs sponsorship / athletic entities	OPAP - Wheelchair basketball's grand sponsor
	Grand Ermis - Best media campaign over all	Corporate	Multimedia campaign for the launch of "Live the Game"
Sales Excellence Awards-Sales institute of Greece and Boussias communications	Gold award	Distinction in sales channels	505 new OPAP stores and sales increase for old stores that were renovated / relocated
	Gold award	Distinction in sales and business development	505 new/renovated OPAP stores
	Gold award	Distinction in education and development of sales	OPAP stores sales team reorganization
	Gold award	Distinction in organizing and sales techniques	Automate processes, projects and reports for more efficient sales management
Healthcare Business Awards-Boussias communications and Health Daily	Gold award	Contribution to Healthcare by businesses outside their industry	Hospital renovation program
Hellenic Paralympic Committee	Grand Sponsor Award	Special Distinction	Recognition for OPAP's longstanding support to the Hellenic Paralympic Committee
Athens Exchange	2nd place Award	Best Investor Relations (IR) Team 2018	Recognition for OPAP's IR effectiveness

C.2 Our Industry

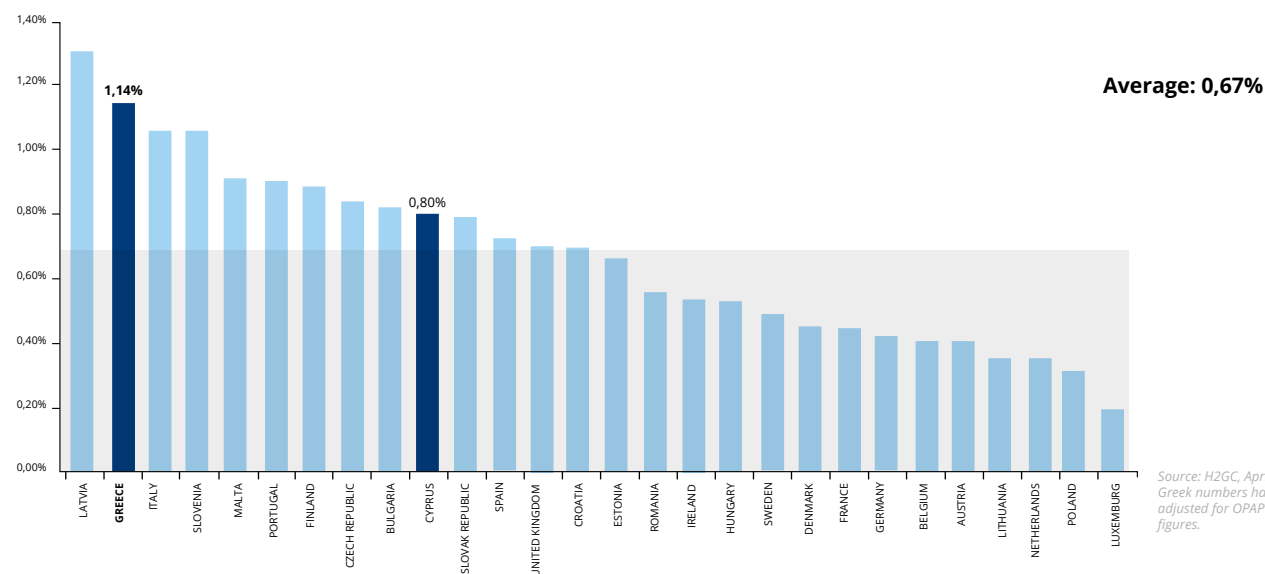
As one of the most well established and dynamic business sectors, the Greek gaming sector consists of the following six main sub-sectors:

- Numerical games.
- Sports betting and horseracing mutual betting.
- Video Lottery Terminals (VLTs).
- Instant and passive lotteries.
- Casinos (includes all games played within casinos).
- Online offshore.

In 2018, Gross Gaming Revenues (GGR) from regulated operators in Greece were estimated to be approximately €2.1 billion and the Greek gaming sector accounted for 1.14% of the country's GDP (Gross Domestic Product).

According to H2 Gambling Capital (H2GC, the leading source of data regarding the global gambling industry), Greece ranks 2nd, among the 28 EU countries, in GGR as a % of GDP. In the same category, Cyprus ranks above average among the 28 EU countries.

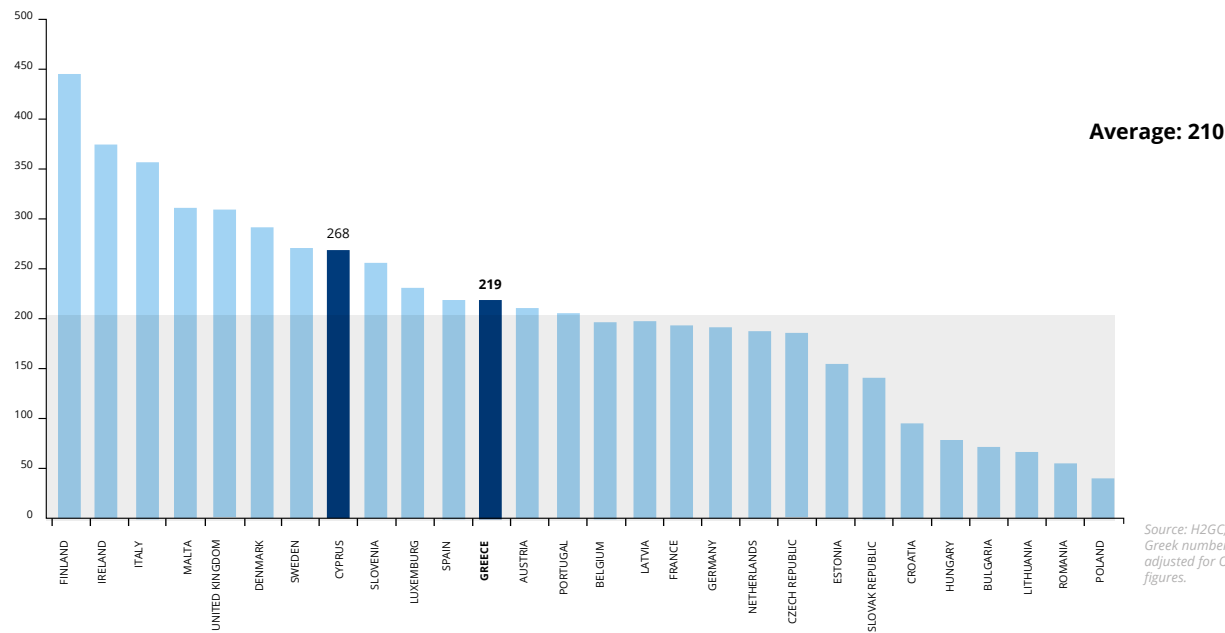
GGR as % of GDP (All 28 EU countries)



Source: H2GC, April 2019.
 Greek numbers have been
 adjusted for OPAP's reported
 figures.



GGR in Europe per adult in 2018



Source: H2GC, April 2019.
Greek numbers have been
adjusted for OPAP's reported
figures.

GGR in the Greek Gaming sector

According to H2GC 2018 numbers for Greece, OPAP held a 70% GGR market share, mainly due to the success of higher VLTs contribution and improved KINO performance.



12%
Casinos

18%
Online Offshore
gaming operators

70%
OPAP



C.3 Our Games Portfolio

C.3.1 OUR PRODUCTS AND SERVICES

Our Games Portfolio is divided into fixed odds betting games (with the final amount being fixed and made known to players at the time of betting) and mutual betting games (where all bets of a particular type are collected and then the yield is calculated by distributing the concentrated bets to the winners).

The following pages elaborate on the betting and numerical games that have been at the top of our customer's preferences, since the initiation of our betting operations in the market, as well as the games that have most recently entered the market and are steadily gaining popularity. These games have been the centerpiece of our success, generating majority of our Gross Gaming Revenue.



C.3.2 BETTING GAMES

The sports betting games category includes the fixed odds games PAME STOIXIMA and MONITOR GAMES and the mutual betting games PROPO, PROPOGOAL, HORSE RACING STOIXIMA and PAME STOIXIMA Virtual Sports.



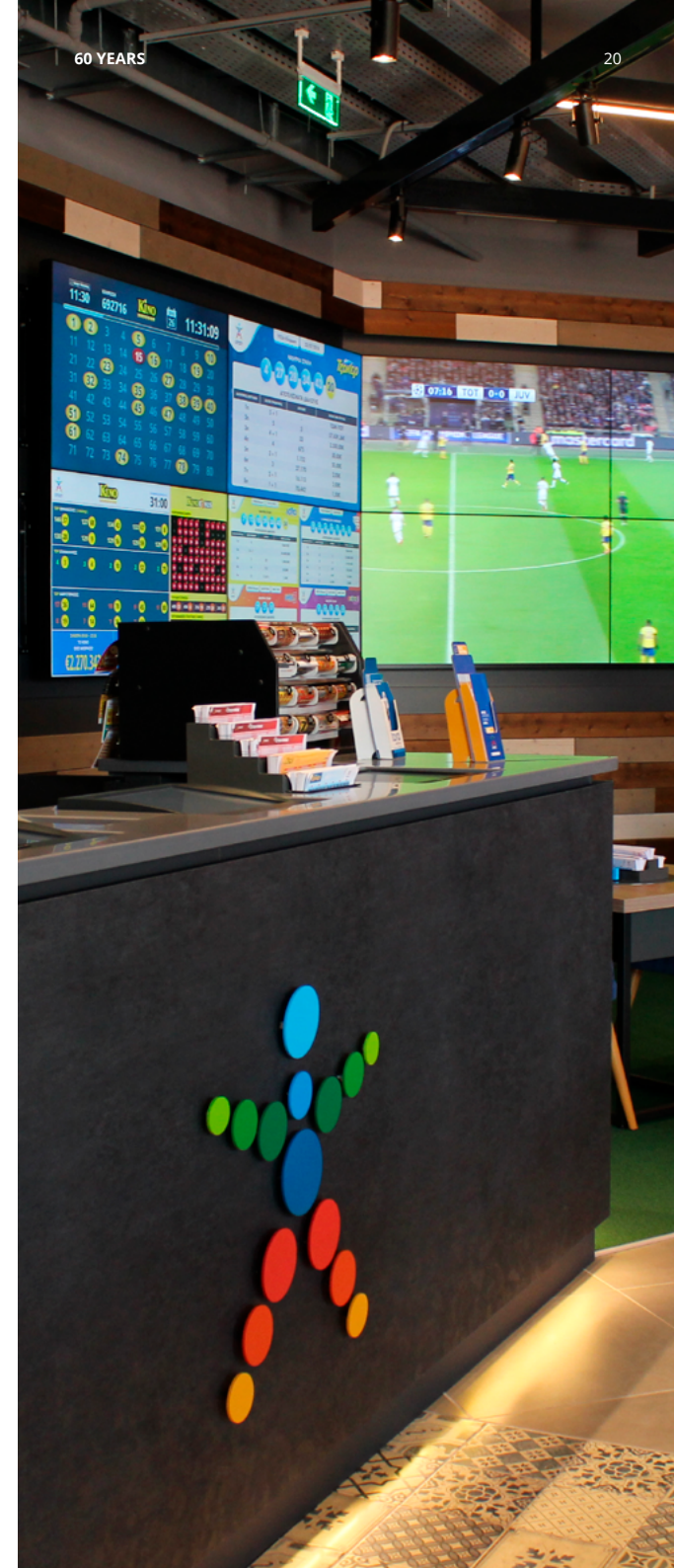
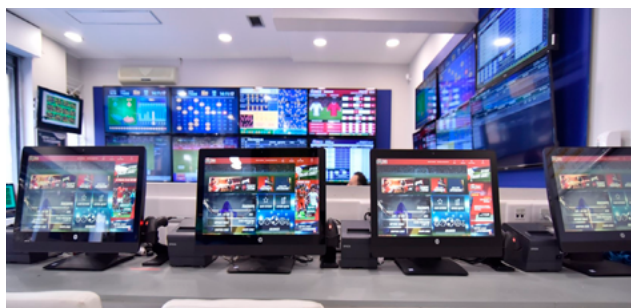
PAME STOIXIMA is a betting game released in 2000. The game includes constant fixed betting odds and mutual betting odds (only apply for horse racing) and requires the player to correctly predict the result or outcome of a sporting event. Players submit their predictions over-the-counter and through Opapbet terminals (Self Service Betting Terminals-SSBTs).

In October 2018, we launched the new "[Pamestoixima.gr](https://pamestoixima.gr)" platform, allowing players to access the betting features of PAME STOIXIMA online. "Pamestoixima.gr" is also available via a new app for mobile and tablet devices (both for IOS and Android), which allows players to catch up on all the sporting action taking place around the world, at real time.



In May 2017, OPAP launched PAME STOIXIMA-Virtual Sports in all agencies, in order to offer a new sports betting experience to sports enthusiasts. The Virtual Sports platform features simulated virtual football matches, with advanced and highly realistic computer graphics, where players are called to predict the outcome of matches. Players submit their predictions over-the-counter and through Opapbet terminals (SSBTs). The game software determines virtual teams' dynamics, based on objective historical data from the respective actual teams, real-life results and their actual ranking.

In November 2018, we launched a second Virtual Football channel, called Matchday. In contrast to the existing Virtual Football product which offers the opportunity to bet on one match, Matchday simulates 8 matches simultaneously, enabling multiples and system betting. Matchday is presented in the form of a league (e.g. Greek Super League, Premier League, etc.) and features a variety of statistics and betting markets.



C.3.3 NUMERICAL LOTTERY GAMES

Numerical Lottery Games were the games that contributed the most to our Gross Gaming Revenue and consist of six games: the fixed odds games KINO, SUPER 3 and EXTRA 5, as well as the mutual games TZOKER, LOTTO and PROTO.



KINO was launched in 2003 and has been offered in all agencies since 2004. KINO is currently our most successful game. The game involves an electronic integrated encryption system which generates random numbers. The player is required to select between 1 or 12 numbers. The electronic system then draws 20 number from a total of 80. Depending on how many numbers the player has chosen to play with and how many numbers from his selection coincide with the system's draw, the respective earnings are calculated accordingly. Draws are held every 5 minutes with a total of 180 draws taking place a day. As of October 2018, OPAP added two new gaming features to KINO, namely "ODDS-EVENS" and "COLUMNS" (KINO side bets). In "ODDS-EVENS" the player is required to predict if a KINO draw result will have more Odds or Evens numbers or there will be a tie. Whilst in "COLUMNS", the player is required to predict which Column (out of 10) will have the most numbers drawn.



TZOKER was launched in 1997 and is the most popular game in the OPAP's portfolio. The player must choose numbers from two areas on the slip and correctly predict 5 numbers (basic numbers), which are drawn from a range of 45 numbers (from 1 to 45), and an additional number drawn from a range of 20 numbers (1 through 20). Players can play in single columns or systems (e.g. full, standard or a combination) and claim wins from 8 categories.

TZOKER has gained extensive appeal throughout our player base and has become the most popular game of chance in Greece due to its impactful commercial advertisements and the high amount of winnings for players.



MATTER OF FACT

In its 21 years of operation, TZOKER has managed to:

Distribute over €1 billion to 1st tier winners, with an additional €1.5 billion to smaller tier winners.

Achieve the highest winning amount on 15/04/2010 when the game distributed €19.3 million

C.3.4 VIDEO LOTTERY TERMINALS



Video Lottery Terminals (VLTs) are electronic machines, certified by the Hellenic Gaming Commission and are used to conduct games of chance. OPAP commenced its VLTs operations in 2017, with their roll out in PLAY Gaming Halls as well as in selected agencies. In 2018, we launched more than 40 new games, totaling in more than 70 unique Play games that we offer now.

Each terminal is a stand-alone machine with a random-number generator, in which the outcome of each wager is random. In order for players to access the games of chance conducted through VLT type, players must be over 21 years of age and are required to submit the Individual Player Card (IPC) issuance application form and abide with the terms of the [Accession Agreement](#). Through this procedure players receive their individual IPC, acknowledging the terms of issuance, management and operation of the IPC and of the agreement.

C.3.5 PASSIVE AND INSTANT LOTTERIES



Since 2014, Hellenic Lotteries S.A. (member of OPAP Group of Companies) has been operating Passive and Instant Lotteries. We offer three different types of games under the umbrella of Passive Lotteries, namely LAIKO (a weekly jackpot draw game, with a guaranteed prize of €100,000), ETHNIKO (the only subscription game in Greece in which every player participates with their unique number) and STATE Lottery (also known as NEW YEAR's Lottery, the most traditional draw game in New Year's Eve). Instant lotteries include the "SCRATCH Luck in an instant" (SCRATCH) brand, which consists of games where players just scratch off the playing area of the ticket, to find out if they have won and receive their potential winnings immediately.

In 2018, LAIKO and ETHNIKO lottery games were redesigned, increasing the overall number of winners. LAIKO introduced a new rewarding scheme, where every week there is a guaranteed winner who wins € 100,000. In 2019, new ETHNIKO editions are expected to be introduced in the market. ETHNIKO's new editions will be more affordable, reducing the number of renewals from 6 to 4, and increasing significantly the number of winners who can win between €200 and €5,000.



SCRATCH games are highly successful due to their high winning rates (about one in four tickets are winning lottery tickets of any type), their diversity (different themes and 5 different price tiers €1, €2, €3, €5 and €10) and their extensive sales network. Passive and Instant Lotteries are available at OPAP agencies and street vendors, while SCRATCH games can be found in convenience stores, kiosks, gas stations and post offices.



C.4 Our Technology Capabilities

Technology is at the core of OPAP's products and defines our customers' physical and gaming experience. The completion of OPAP's technology transformation program in 2018 was an important achievement, delivering strategic benefits to the organization and supporting the achievement of our 2020 vision.

The technology transformation program has been implemented for more than two years and included a € 100 million investment in the technologies in use throughout our network. This investment was capitalized and resulted in the roll-out of 9,300 new terminals in Greece and Cyprus, 12,000 new digital signage players in shops, 8,000 new satellite receivers and the installation of more than 400 virtual servers.

In 2018, new internal technology capabilities were established, which enabled OPAP to accelerate its innovation process, delivering new solutions at a fraction of the cost and time, compared to the previous outsourced model, where certain functions, such as the business operation of the numerics central platform and the retail terminal support were outsourced to a third party organization.

Additionally, OPAP gained greater direct control of the technology architecture landscape by reducing the number of external vendors it collaborates with, assuming responsibility for key software system components, such as the Player Account Management (PAM) system, and by providing ongoing support services for its network's retail equipment – for example, the new terminals and digital players signage hardware and software are now centrally supported by the newly established retail equipment support team.



Building upon the foundation laid out by the technology transformation program, OPAP will continue to accelerate the delivery of new products and solutions and work towards achieving its 2020 vision.

The background of the page features a photograph of the OPAP building, a modern structure with a grid-like facade of windows and balconies. On the roof of the building, the OPAP logo is prominently displayed, consisting of a cluster of colorful spheres (blue, green, red, orange, yellow) and the letters 'OPAP' in blue. The large white text 'D. Corporate Governance' is overlaid on the right side of the image.

D. Corporate Governance

IN THIS SECTION

1. Chairman's Statement
2. Governance and Leadership
3. Members and Relevant Experience
4. Audit Committee Report
5. Remuneration and Nomination Committee Report
6. Executive Committees
7. Corporate Responsibility Management

D. Corporate Governance

Establishing a robust governance framework

We have established a robust and structured governance framework that is transparent, fair and disciplined and where our strategic priorities and core values are firmly embedded. The following pages present the key features of our framework.

For extended information on our Corporate Governance framework, please refer to the [2018 Annual Financial Report](#) and our [corporate website](#).

D.1 Chairman's Statement

The Board believes that implementing and maintaining high governance standards underpin our business objectives and our drive to create and maximize shareholder value whilst managing the business effectively, responsibly and with integrity, so that we demonstrate accountability and maintain the trust of all our stakeholders. We are constantly seeking to develop our practices and governance framework to ensure that transparency and good governance permeate through the Group at all levels. In addition to compliance with the best practice advice from regulatory and governance bodies, the Board wishes to ensure that high ethical standards are reflected in business behavior and culture through OPAP's Group Code of Conduct, which was approved by the BoD in 2015 and amended in 2016. The Company's management and employees have acknowledged in writing that they have read and understood the Code and that they will adhere to and comply with its principles and provisions, as amended from time to time.

The Company updated its Code of Conduct in 2018. The updated Code, which establishes a structured framework applicable to OPAP S.A. and its subsidiaries and which proves that OPAP is a transparent organization acting in accordance with the principles and rules of the Code of Conduct, as well as its legal and regulatory obligations, was approved under the Resolution of the Meeting of the Board of Directors of OPAP S.A. which was held the 13th of December 2018.

The Company has established a structured framework of policies, processes, principles and roles to ensure that OPAP S.A. and its subsidiaries comply with the applicable legal, regulatory and contractual framework and take preventive measures to limit possible risks before they materialize.

In this respect, OPAP S.A. applies a Whistleblowing Policy, under the responsibility of the OPAP Group Regulatory and Compliance Officer, which applies in case of violation of the Code of Conduct or other serious violation of the applicable framework. The Company has therefore established the Whistleblowing Complaints Policy by which employees can and should report to the Company valid allegations of known or suspected alleged Improper Activities.

Furthermore, the Company established an Audit Committee which, among other things, monitors the effectiveness and adequacy of the risk management framework, the policies and systems of the Company and the Group. It also monitors the effectiveness of the system which monitors compliance with the laws and regulations and the results of the administration's research and follows up on disciplinary measures of non-compliance complaints.

Risk Assessment and Management

The Board monitors the level of risk through the Group's major risk assessment process which is facilitated by the Internal Audit with the cooperation of Risk Unit, presented to the Audit Committee and submitted to the Chairman of the Board and the CEO. We remain committed to building on and improving our understanding of the key risks facing the Group and its business operations and we constantly refine our tolerance of such risks.

Board Evaluation

The Hellenic Corporate Governance Code recommends that listed companies should undertake an evaluation of the Board at least once every two years based on a predefined process. The Board performs its annual evaluation internally.

Diversity

OPAP S.A. is an equal opportunities employer who promotes an inclusive and diverse culture, and is committed to the promotion of equality through our workforce, players, retailers and society. The Company operates under a corporate diversity and inclusion principle adopted. The Board reiterates its view that facilitating and promoting diversity in its broadest sense has helped propel the Company's success to date. It remains its practice to ensure that the Company's Top executive roles, in particular, are open to fresh thinking and must include personnel from different global backgrounds who bring new ideas to the table. It is OPAP's policy to make decisions regarding recruitment and selection, remuneration, career development and training, transfers, promotion and succession planning based solely on merit – being the skills, experience, qualifications and potential of the individual connected to the job – without regard to gender, age, sexuality, family circumstances, marital status, disability, religion, political preference, trade unionism or any other classification protected by applicable law.

Explanation on Non-conformities with the Code

The Board recognizes that the objective of the Code is to facilitate management's delivery of business success in a transparent and responsible manner. The Code does not impose a rigid set of rules and recognizes that certain actions and behaviors do not automatically imply poor organizational governance.

The Board provides an explanation for the following areas:

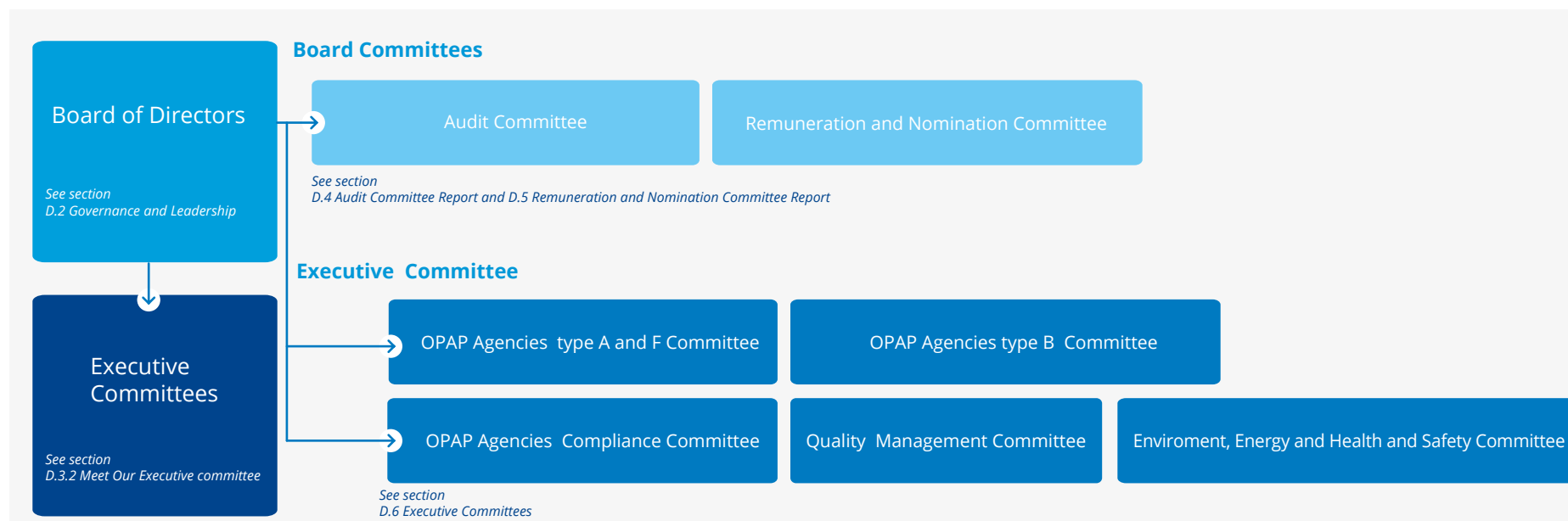
- The BoD composition is considered satisfactory since it is comprised in its majority of non-executive directors from various industries, nationalities, and age groups. In addition, 3 independent members of the Board have been appointed, although Greek law requires a minimum of 2 independent Board of Directors, as these meet the requirements set out in the article 4 par. 1 of Law No. 3016/2002 and in the Hellenic Corporate Governance Code.
- Two non-executive Vice Chairmen were appointed. The Audit Committee Chairman is independent non-executive member of recognized international standing in the area of auditing.
- The Remuneration and Nomination Committee is composed of Non-Executive Directors, who are independent from executive tasks, including the two Vice-Chairmen of the Board and is considered adequate to fulfill its purpose.

Kamil Ziegler

Chairman of the BoD

D.2 Governance and Leadership

OPAP's governance structure enables the group to achieve its strategic priorities and create value.



We describe Corporate Governance as the way in which OPAP is governed and controlled and we have adopted the Hellenic Corporate Governance Code, issued by the Hellenic Council of Corporate Governance (ESED), in order to facilitate a common understanding on behalf of our employees and generate added value for all our stakeholders. Corporate Governance:

- Constitutes the structure, through which we set and manage our objectives, determine the methods to achieve them and monitor the Management's performance.
- Establishes standards of governance and best practices, as well as promotes enhanced transparency.
- Reflects the policies and procedures to achieve good governance practices.

BOARD ROLE

The Board of Directors (BoD) is the company's supreme administrative body that mainly formulates the company's strategy and growth policy, supervises and controls its management and administration of corporate affairs and pursues its corporate purpose. The BoD is competent to decide on every issue concerning the company's assets management, administration, representation and its operations in general and take all appropriate measures and, decisions which assist the company to achieve its objectives, except for the issues that fall within the exclusive competence of the General Meeting, according to the provisions of the law or the Articles of Association.

Board Composition

The BoD composition is considered diverse, competent and experienced since it is comprised in its majority of Non-Executive Members from various industries, nationalities and age groups. The Board meets regularly, once per month and organizes additional meetings (including by telephone, video-teleconference or written resolution) to consider specific matters which it has reserved for decision. In 2018, there were thirteen regular Board meetings (plus twelve additional meetings via rotation).

Board Member Name	Position	Attendance	Representation	Executive Member	Independent Member
Kamil Ziegler	Chairman	13	-	√	
Damian Cope	Chief Executive Officer	13	-	√	
Spyridon Fokas	A' Vice-Chairman	13	-		
Pavel Horak	B' Vice-Chairman ¹	12	1		
Michal Houst	Chief Financial Officer	13	-	√	
Pavel Šároch	Member ²	10	3		
Robert Chvátal	Member	13	-		
Christos Kopelouzos	Member	12	1		
Dimitrakis Potamitis	Member	12	1		√
Rudolf Jurcik	Member	10	3		√
Igor Rusek	Member	9	4		√
Marco Sala	Member	-	13		
Stylianios Kostopoulos	Member ³	7	2		
Georgios Melisanidis	Member ⁴	-	4		

Notes:

In the year 2018, twelve (12) additional Meetings were held per rotation, in which all members participated.

¹ Starting from 25.04.2018, Mr. Pavel Horak was replaced by Mr. Pavel Šároch as B' Vice-Chairman.

² Mr. Pavel Šároch was/served as B' Vice-Chairman until 25.04.2018.

³ Starting from 25.04.2018, Mr. Stylianios Kostopoulos nominated as Non-Executive Member.

⁴ Mr. Georgios Melisanidis was/served as Non-Executive Member until 25.04.2018

Initial selection of BoD Members is conducted by the BoD itself, which delegates the screening process involved to the Remuneration and Nomination Committee. The criteria that are taken into account are their professional experience and expertise and are further defined by the Remuneration and Nomination Committee while, at the moment, there is no separate consideration of gender diversity during their selection. The company measures year-on-year progress to ensure improving diversity balance.

Main Delegation Subjects

The main subjects that Board delegated in 2018 were the following:

- Significant business projects.
- Interest and capital expenditure projects.
- Final approval of annual budgets, business plans, organizational structure, advertising and sponsorships program.
- Approval of Financial Statements and shareholder communications.
- Treasury policies and changes to borrowing facilities or currency transactions.
- Regulatory compliance issues and related policies.
- Significant transactions with related parties.
- Review and approval of recommendations from the Committees of the Board.
- Protection of legal interests of the Company.

Members Responsibilities

We have clearly defined our Board Members' responsibilities, as outlined below, to facilitate adhering to good Corporate Governance practices.

Chairman

According to the company's Articles of Association and Internal Rules and Regulations, there is a clear division of responsibilities between the Chairman and the CEO, a significant change compared to the past when the position and duties of the Chairman of the BoD and CEO were unified. The Chairman's competences are indicatively outlined below:

- Chair and ensure that Board meetings allow open debate and encourage effective contribution from individual Members, allocating adequate time for the discussion of key issues.
- Encourage dialogue between the company, its shareholders and other stakeholders and facilitate the Board's understanding of shareholders' and other stakeholders' concerns.
- Oversee the induction, information and support provided to directors.
- Lead the annual performance evaluation of the Board and its Committees.
- Determine the items of the agenda (including items that may have been recommended by the Vice Chairman or any other BoD member), schedule meetings in a way that ensures that the majority of BoD Members are present and send Members the necessary material to assist debate and decision-making in due time.
- Ensure that the BoD complies with its obligations towards its shareholders, the company, the supervisory authorities, the law and the company's Articles of Association.
- Represent and bind the company where a resolution of the BoD is issued

Chief Executive Officer

The CEO is vested with all powers necessary to act in all circumstances on behalf of the company. He exercises these powers within the limits of the corporate purpose, in accordance with the rules set forth by the law and the company's Articles of Association, and subject to the relevant resolutions of the Shareholder Assembly and the BoD.

The CEO is also in charge of all Company departments, directs their work, makes the necessary decisions within the context of the framework governing the Company's operations, the approved projects and budgets, Board decisions as well as the Business and Strategic Plan.

The CEO's competences indicatively include:

- Supervise company's business and financial policy.
- Monitor and assume responsibility for the company's financial results and profitability.
- Monitor internal organization and take appropriate measures to promote and utilize human resources and proposes approval of new regulations and organizational charts to the BoD.
- Approve employee recruitment, as appropriate.
- Define the company's strategic targets, in cooperation with the BoD and the Executive Management.
- Set targets and KPIs and monitor the Management's performance.
- Delegate the day-to-day management of the company's business to each of the Executive Committee's Officers, acting individually, jointly or as sub-committee.
- Acquire and dispose businesses and approve unbudgeted capital expenditure projects, subject to a limit per transaction defined by the BoD in each case.
- Represent and bind the company against third parties for signing payment orders, bank checks, payment of salaries, insurance contributions and payment of taxes and fees of any nature to the State.
- Represent the company judicially and extrajudicially and sign every document from or addressed to the company, instruct advisers and instigate legal proceedings on behalf of the company in respect of matters for which no further collective Board authority is required by the law or the Articles of Association.
- Oversee the company's day-to-day operations and supervise each Unit on how to perform its tasks.

Non-Executive Members

Non-Executive BoD Members do not perform executive or managerial duties, but they contribute and help the BoD with their following indicative competences:

- Constructively challenge and help to develop strategy proposals.
- Submit reports individually or jointly to the Shareholders' Assembly Meetings, separately from the BoD reports.
- Participate in BoD Committees or any other working group or ad-hoc committees formed and perform the duties assigned to them.
- Provide international and operational experience, knowledge and understanding of global financial issues, the sectors in which OPAP operates and their corresponding challenges.
- Manage conflicts of interest.

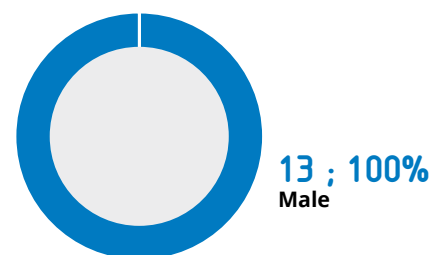
D.3 Members and Relevant Experience

D.3.1 MEET OUR BOARD

We are proud to have a Board of Directors whose members have strong academic and professional backgrounds and diverse skillsets. Majority of our board members have had numerous years of international experience in commercial and investment banking. Also, majority of our members have held high ranking positions in gaming and betting companies and therefore possess very good knowledge around the gaming and betting market, helping OPAP to deliver key strategic decisions to become a world class gaming entertainment company.

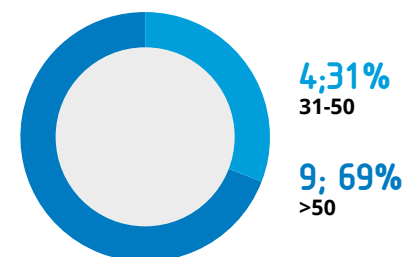
Gender Distribution

(number of BoD Members ; percentage)



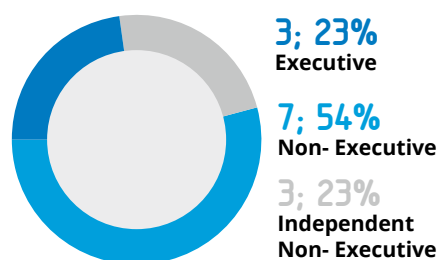
Age Distribution

(number of BoD Members ; percentage)



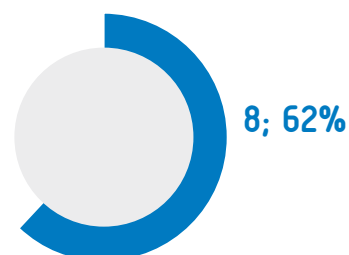
Member Dependence

(number of BoD Members ; percentage)



Experience in Gaming Industry

(number of BoD Members ; percentage)



Member Nationalities





Kamil Ziegler

Chairman of the Board

Mr. Kamil Ziegler is the Executive Chairman of OPAP S.A.

He began his professional career at the State Bank of Czechoslovakia where he served in different managerial positions: he worked as an Executive Director for Finance at Komerční banka, Prague, and then as a deputy CEO and Board member at Czech Savings Bank. Thereafter, he was appointed Chairman of the Board and CEO in the Czech state-owned Consolidation Bank. After that he served as Chairman of the Board and CEO in Raiffeisenbank Czech Republic. He also held the position of Executive Director for Finance and Board Member in the PPF Group. His last executive appointment was as the CEO and proxy holder in SAZKA A.S., the largest Czech lottery organisation, where he is currently serving as a Board member.

Mr. Ziegler has been also a member of the Board of Directors and member of Supervisory Boards of many companies in the Czech Republic, Netherlands and Cyprus.



Damian Cope

Chief Executive Officer

Mr. Damian Cope was appointed Chief Executive and an Executive Board Member of OPAP S.A. with effect from July 2016.

Mr. Cope has over twenty years' experience in the gaming industry having held a number of senior roles across both retail and digital operations. Prior to joining OPAP Mr. Cope was Managing Director, International and Group Strategy Director of the leading UK bookmaker Ladbrokes (now part of GVC Group). At Ladbrokes Mr. Cope had responsibility for all non-UK, betting & gaming activities, across both retail and digital channels. This included regulated businesses in Spain, Belgium, Denmark, Ireland and Australia.

Mr. Cope was also a Board Director of Sportium Apuestas Deportivas, the Spanish sports betting JV with Cirsa Group. Previously Damian was Group Chief Information Officer and Managing Director, Ecommerce for the Gala Coral Group, the leading UK operator of betting, bingo and casino activities. He also held senior management positions at Rank Group Plc and Blue Square.



Executive member



Non-executive member



Independent Non-executive member



Member of the Audit Committee



Member of the Remuneration and Nomination Committee



Spyridon Fokas

A' Vice-Chairman

In 1977 Mr. Spyridon Fokas graduated from the Law School of the National and Kapodistrian University of Athens, whilst during 1977-1978 he undertook post-graduate studies in shipping law at the University College London.

As an Attorney-At-Law Mr. Fokas has been a member of the Piraeus Bar Association since 1980 and practices law specializing in the sectors of maritime and corporate law, whereas he is also a member of the Hellenic Maritime Law Association.

Mr. Fokas is a member of the General Council of Hellenic Federation of Enterprises (SEV) and since 2005 he is a member of the Board of Directors and General Counsel of Aegean Marine Petroleum Network Inc.



Pavel Horak

B' Vice-Chairman

Presently the Partner and the Chief Investment Officer of EMMA Capital. Mr. Pavel Horak is simultaneously representing EMMA Capital in the Board of Directors of Sazka Group, a.s., the main investor in Emma Delta Hellenic Holdings. Before joining EMMA Capital, Mr. Pavel Horak served in position of Chief Financial Officer of Home Credit Group since 2012 and previously Chief Financial Officer of PPF Group since 2006.

Mr. Horak gained experience in financial management as an auditor at Deloitte & Touche, and later during his tenure as CFO of TV NOVA from 2001 to 2006.



Pavel Šaroch

Member

Having specialized in investment banking and economic management of corporations since 1995, Mr. Šaroch has served in management positions with securities trading firms such as Ballmaier & Schultz CZ and Prague Securities. From 1999 to 2001, he was Member of the Board of Directors at I.F.B., which focuses on organizational and economic consultancy, management of private investment projects. In 2001, he was appointed Deputy Chairman of the Supervisory Board of ATLANTIK finanční trhy and subsequently became a member of the company's Board of Directors.

Mr. Šaroch is a member of the Boards of Directors of the parent company of KKCG investment group KKCG AG and of individual holding companies that belong to the Group. In KKCG a.s. he represents the position of the Chief Investment Officer.

Moreover, he is a member of the board of directors of SAZKA Group a.s. and its subsidiaries.



Executive member



Non-executive member



Independent Non-executive member



Member of the Audit Committee



Member of the Remuneration and Nomination Committee



Michal Houst

Member

Mr. Michal Houst began his professional career in JM Engineering as a financial manager, before moving to PPF Group as a financial analyst focusing on banking & consumer finance.

In 2010 he became chief banking analyst at PPF Russia, with the focus of his responsibilities on Nomos Bank contributing to its successful IPO and responsible for the preparation of the whole financial section. He was later appointed as a project manager, responsible for various development & restructuring projects within the Bank.

In 2013 he joined EMMA Group as an Investment Director and a key individual for OPAP privatization. He joined the company later the same year as an Executive Director & CFO contributing to its efficient restructuring and growth ever since. In January 2019, he assumed the role of Deputy CEO, in addition to his CFO responsibilities, to further optimize business processes and deliver highest level of operational performance.



Christos Kopelouzos

Member

Born in Athens, Mr. Christos Kopelouzos is currently Co-CEO of Copelouzos Group with business activities in the area of Natural Gas, Renewable Energy, Electricity Production and Trading, Real Estate, Concessions, Airports and Gaming.

In 2002 he completed his studies at the City University/ City Business School in the field of Investment & Financial Risk Management.



Marco Sala

Member

Mr. Marco Sala is Chief Executive Officer of International Game Technology PLC ("IGT"), and serves on its Board of Directors. He is responsible for overseeing the strategic direction of the Company, which is publicly traded on the New York Stock Exchange (NYSE:IGT).

He works directly with the board and other senior management to establish long-range goals, strategies, plans, and policies. Prior to April 2015, Mr. Sala served as Chief Executive Officer of GTECH S.p.A. (formerly known as Lottomatica Group) since April 2009, and was responsible for overseeing all of the Company's segments including the Americas, International, Italy, and Products and Services. He joined the Company as Co-General Manager in 2003, and since then, has served as a member of the Board of Directors.



Executive member



Non-executive member



Independent Non-executive member



Member of the Audit Committee



Member of the Remuneration and Nomination Committee



Robert Chvátal

Member

Mr. Robert Chvátal began his professional career in 1991 with Procter & Gamble and Benckiser before spending 15 years in mobile telecommunications as Chief Marketing Officer for T-Mobile Czech, and later as CEO of T-Mobile Slovakia and T-Mobile Austria.

Since 2013, he joined lottery sector by being appointed the CEO and a member of the BoD of Sazka a.s., which, following a turnaround, has become one of the fastest growing lottery companies globally.

In 2017 Mr. Chvátal was appointed as CEO of SAZKA Group, while since the same year he serves as an OPAP Board Director. Mr. Chvátal has also been elected since 2015 as the 1st Vice-President of the European Lotteries.



Stylianos Kostopoulos

Member

Since 1989, Mr. Stylianos Kostopoulos has held numerous managerial positions in the Financial and Banking sector, mostly in BNP Paribas and Omega/Proton Bank, being responsible for Wealth Management, Corporate & Investment Banking, Credit Analysis, Loan Administration and Customer Services.

Since 2006, he has joined Aegean Oil, heading the Family Office of the Founders and being BOD member, CFO, Financial Advisor and Treasurer in various companies. In parallel, since 2013, he has served as Member of the BoD of EMMA DELTA VCIC and its affiliates.



Rudolf Jurcik

Member

Mr. Rudolf Jurcik is currently the Owner and Executive Director of the Prestige Oblige, Private Management & Consultants FZ LLC in Dubai. Previously, he served as the CEO of MAF Hospitality (Property) in Dubai and as President of the Oberoi International Group in New Delhi. He has also worked as a Special Advisor to the CEO of Air France Group in Paris and as Managing Director of Forte/Meridien Hotels in Paris.

Additionally, Mr. Jurcik has served as a Senior Vice President of Meridien, based in Athens. He has also worked as a French foreign trade Advisor and as a COO of the Casino Royal Evian in France.



Executive member



Non-executive member



Independent Non-executive member



Member of the Audit Committee



Member of the Remuneration and Nomination Committee



Dimitrakis Potamitis

Member

Mr. Dimitrakis Potamitis' professional career began in 1968, as a junior auditor at PricewaterhouseCoopers International Limited (PwC). His main expertise was shipping and banking audits. Since 1982 and up until 2004, Mr. Potamitis was a PwC Partner in charge of Piraeus Office-Greece, while from 2004 up to 2008 he acted as a Consultant. From 2008 and up until today he is an Independent, Non-Executive Board Member of Aegean Baltic Bank S.A. and Chairman of the Audit Committee, as well as Member of the Remuneration Committee (from 2012) of the aforementioned bank.

Mr. Potamitis has also provided specialist consultancy and advisory services in matters related to the audit of the Financial Statements of companies in the shipping industry. He is a Member of the Hellenic Institute of Public Accountants – Auditors.

In 2017, Mr. Potamitis was appointed as Chairman of the Audit Committee in Resolute Asset Management S.A., a specialist real estate asset management and non-performing loan servicing firm. Furthermore in 2018 Mr. Potamitis was appointed as a member of the Quality Review Council of Hellenic Accounting and Auditing Standards Oversight Board (HAASOB/ELTE), acting as a quality reviewer of the financial statements of non-listed companies.



Igor Rusek

Member

Dr. Igor Rusek has served for many years as a member of Boards of Directors of various international groups of companies and has managed for two decades in this capacity the organisation of internal audits, accounting standards and corporate governance under applicable international standards. From 1994 to 2001, he was Associate Attorney at ATAG Ernst & Young, auditing and consulting firm in Basel. In 2001 he was appointed Partner and Member of Executive Committee at ATAG Private & Corporate Services Ltd (ATAG PCS).

During his role as CEO of ATAG PCS from 2007 – 2018, Dr. Rusek also had the Chair of the Compliance Audit Team and was mainly responsible for Audit and Tax Audit Procedures in companies which are administrated by ATAG PCS, as well as their Corporate Governance. Meanwhile Dr. Rusek is the President of the Board of Directors and partner of ATAG Attorneys Ltd, a law firm which roots reach back to 1917 founded ATAG, a leading Swiss advisory company.



Executive member



Non-executive member



Independent Non-executive member



Member of the Audit Committee



Member of the Remuneration and Nomination Committee

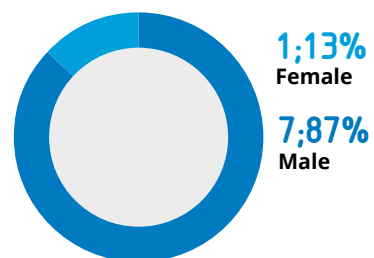


D.3.2 MEET OUR EXECUTIVE COMMITTEE

Our Executive Committee, as of 01.01.2019, consists of senior-level executives and members of the board. The committee is responsible for providing organizational oversight to OPAP's main operations, participates in the company's strategic planning and advises the board on relevant business matters

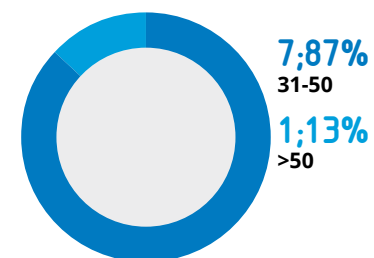
Gender Distribution

(number of Executive Committee Members ; percentage)



Age Distribution

(number of Executive Committee Members ; percentage)



Member Nationalities





Damian Cope

Chief Executive Officer

Damian was appointed Chief Executive and an Executive Board Member of OPAP SA with effect from July 2016. Damian has almost twenty years' experience in the gaming industry having held a number of senior roles internationally, across both retail and digital operations.



Michal Houst

Chief Financial Officer

Michal began his professional career in JM Engineering as a financial manager, before moving to PPF Group as a financial analyst focusing on banking and consumer finance. In 2010 he became a chief banking analyst at PPF Russia. In 2013 he joined EMMA Group holding the position of Investment Director, where he was one of the key individuals in the privatization of OPAP within the same year when he joined the company.



Odysseas Christoforou

Chief Corporate Affairs Officer

Odysseas has held management positions at Arthur Andersen and Ernst & Young South East Europe, while later he served as General Manager of Communication at Emporiki Bank and Bank of Cyprus. From 2008 to 2014 he served as Senior Executive to the Governor of the Bank of Greece. Since 2014 he is Chief Corporate Affairs Officer at OPAP.



Michele Fusella

Chief Technology Officer

Michele started his career in the gambling industry in 2000, joining Coral-Eurobet, while later he held director IT positions in Gala Coral Group, Ladbrokes Plc and Sportium Apuestas Deportivas. He joined OPAP in August 2016.



Petr Matejovsky

Chief Customer Officer

Petr joined OPAP in 2013 as CMO, and is currently serving the role of CCO; previously he held different positions in Telefónica Czech Republic. Petr is an experienced marketing professional with an extensive record of achievements, having experience in the management of key cross-company & transformation projects.



Jan Karas

Chief Operating Officer - Retail

Jan joined OPAP in 2014 to lead the development and operation of OPAP stores' channel and Indirect Sales channels. Previously he held several senior executive positions in Marketing, Sales and Product development in the Telecommunications sector.



Vaios Karantinos

Chief Operating Officer – Gaming Halls

Vaios has been with OPAP since 2014, and currently leads the VLTs roll-out as Chief Operating Officer – Gaming Halls. He started his career in Sales by holding executive roles at WIND Hellas for 17 years, where he quickly became a member of the management team.



Isabelle Moser

Chief People Officer

Isabelle joined Opap in October 2016 having previously cooperated with the group on Human Resources matters since its privatisation. She is a Senior Human Resources executive with extensive international experience both in HR line and consulting holding previously management positions at PwC, Randstad, Schindler and Societe Generale Group/ Geniki Bank.

D.4 Audit Committee Report

Overview

The Audit Committee was created by the Board of Directors of OPAP S.A., in October 2013. As an independent body, the Audit Committee is able to oversee the affairs of OPAP S.A. ethically and with responsibility. This duty is its main role at present and in the future. The activities undertaken by the Committee include activities in different fields such as review of the financial information subject to regulation, control of market risks, oversight of management model, monitoring the independence of the statutory auditor and appraising the business of the Internal Audit division.

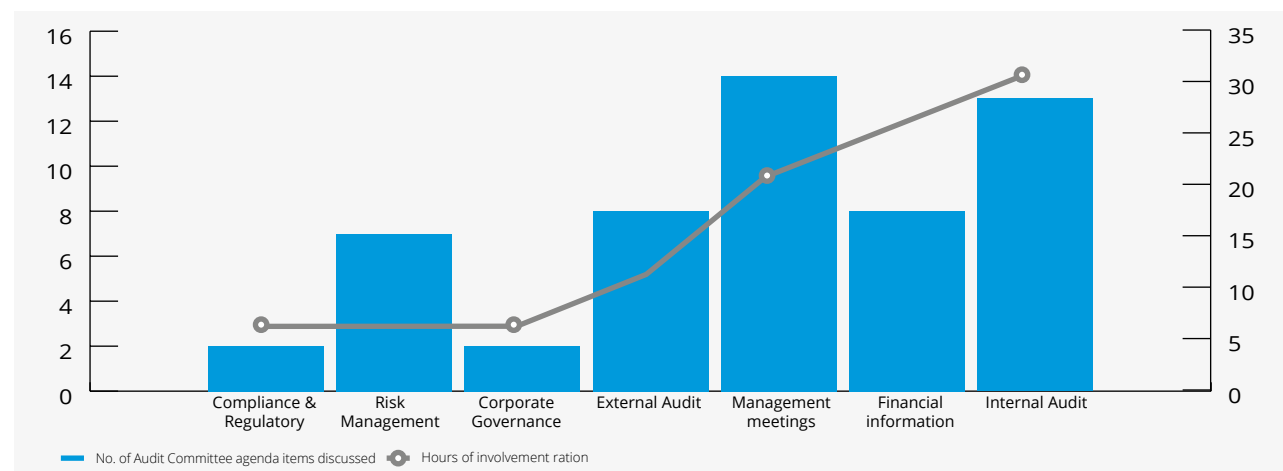
Members and their Roles

The Audit Committee consists of three independent and non-executive members:

Board Member Name	Position	Attendance
Dimitrakis Potamitis	Chairman	10
Rudolf Jurcik	Member	10
Igor Rusek	Member	8

Audit Committee Meetings

The Audit Committee met 10 times in 2018 at the premises of the Company.



Major Duties of the Audit Committee

- Monitor the drafting of the financial statements and report on the annual, half-yearly and quarterly financial statements;
- Inform the Board of Directors of the audited entity about the outcome of the statutory audit and explain how the statutory audit contributed to the integrity of the financial information and what was the role of the audit committee in that process.
- Monitor the financial reporting process and make recommendations or proposals to ensure its integrity.
- Report to the Board of Directors on any change regarding accounting policies balance sheet risk and off-balance sheet risk.
- Propose the appointment of statutory auditors to the Board of Directors, for subsequent referral to the General Meeting of Shareholders.
- Oversee internal audit services, ensure the quality and risk management of the Company and, where applicable, its internal audit unit, with regard to the financial information of the audited entity without infringing the independence of that entity. Also, the Audit Committee shall report on the process of selection, appointment, reappointment, removal and remuneration of the Internal Audit Head and on Internal Audit division budget.
- Familiarize themselves with the financial information reporting process and internal audit systems.
- Review and monitor the independence of statutory auditors or audit firms.
- Oversee the selection process of statutory auditors or audit firms
- Liaise with the external auditors so as to receive information on any matters that could jeopardize the latter independence and any other matters relating to the financial auditing process.

Audit Committee 2018 Activities

- Presentation of KPMG Audit Planning and independent confirmation.
- Audit fees confirmation and proposal to the BoD to approve auditing and non-auditing fees
- Internal Audit Plan approval
- Review of interim unaudited financial statements and quarterly accounts
- Monitoring of Internal Audit Plan and of reports of internal audit
- Meetings with key personnel (IT, Legal, Accounting and Financial Information, AML and Compliance, Data Protection, Digital Gaming and self-service terminals etc.)
- External Auditors work done on significant matters
- Attendance with the Chairman of the Board of Directors
- Meeting with the Head of Investors relations
- Meeting with External Audit Partner
- Monthly meeting with Head of Internal Audit

Conclusion

As a result of the above activities, we believe that the Audit Committee performed its role and responsibilities effectively. No unusual transaction, illegal payment, violation of law and regulation came to our attention that should affect the Consolidated Financial Statements. Furthermore, the Audit Committee believes that the Company has policies and controls to prevent and detect fraud and maintains an adequate internal control including controls over financial reporting in accordance with the nature and size of its operations.

D.5 Remuneration and Nomination Committee Report

Overview

The Remuneration and Nomination Committee, as it was renamed by the 26.05.2016 Board of Directors' decision, is responsible for deciding on the fees that encourage good customer service, are fair to all our employees and are aligned with the interests of all of our shareholders.

Members and their Roles

The Remuneration and Nomination Committee consists of three non-executive members.

Board Member Name	Position	Attendance
Pavel Šaroch	Chairman	5
Spyridon Fokas	Member	5
Pavel Horak	Member	5

Major Duties of the Remuneration and Nomination Committee

- Ensure that there are adequate procedures for the evaluation of the Chairman's, non-executive Board Members', executive Board Members', and key personnel's (reporting directly to the CEO) remuneration, as well as Board and Board Committees remuneration.
- Ensure that the Company adopts, monitors and implements appropriate policies and remuneration procedures.
- Ensure that disclosures regarding remunerations meet the disclosure objectives of the Board of Directors and of all relevant legal requirements.
- Review the Board's executive members' and executive officers' succession plans on a regular basis to maintain an appropriate balance of skills, experience, expertise and diversity in the management of the Company, providing advice to the Board accordingly.
- Evaluate candidates and propose new members for the Board of Directors.

Remuneration Regime

Bonus schemes were adopted that build incentives via specific KPIs. Established criteria include quantitative benchmarking based on the overall Company performance, taking into account key profitability metrics

Qualitative criteria also apply, focusing on managerial skills, training and development of the working teams, project deliveries, external communication etc.



Bonuses and other variable remuneration arrangements are common practice for companies listed in the FTSE100 index. Research has shown that 99% of executives working in the FTSE100 companies at the Executive Committee level and above have a ratio of variable to fixed remuneration in excess of 1:1. At OPAP, this ratio of variable to fixed remuneration is only applicable to the Chairman of the Board and the Chief Executive Officer.

The Remuneration Policy of the company applies to the remuneration of all Board members. It is designed to reflect fair payment conditions for all employees and align the Board's remuneration with the interests of our shareholders. The objective of the Remuneration Policy is therefore to meet market practice, to serve the Company's strategic vision, its shareholders, clients and wider stakeholders.

It is expected that the detailed remuneration policy will come for shareholders' approval at the 2019 Annual General Meeting.

Long-term Incentive Scheme

The Board of Directors of the Company, following a recommendation of the Remuneration and Nomination Committee, on 28.3.2017, approved a 3-year long-term incentive scheme, that would run from 2017 to 2019. The scheme involved the distribution of part of the Company's net profits to Executive Members of the BoD and other Key Management Personnel of the Company, excluding the CEO. The agreed performance targets relate to the profitability of the Company for the 3-year period mentioned above and the Company's share price increase in Athens Exchange. The maximum amount to be distributed to up to 30 beneficiaries is € 7,000,000.

Conclusion

We hope that this report achieves the aim of improved transparency and clarity under the new reporting requirements and that we can count on your support at the forthcoming AGM for both our Remuneration policy and the decision we have taken as a committee during the year.



D.6 Executive Committees

We have established a number of executive committees that report, consult and advise our BoD on various business matters and support the effective operation of the company.

OPAP Agencies type A' and F' Committee

In 2018, the “Agencies Committee” was renamed as “OPAP Agencies type A' and F' Committee”. The Committee, having an advisory and consultative role to the company's Board of Directors, is responsible for evaluating issues related to OPAP agencies, with (type F) and without (type A) VLTs. Opinion giving duties of the committee involve the termination of agency contracts, spatial planning for new agencies, provision of additional agencies to existing agents, introduction of new partners into the agencies' network or any other relevant issue that the Committee considers pertinent for the BoD to decide.

Furthermore, the Committee has executive powers regarding relocations, expansions, transfers, consensual termination of agencies' contracts and the support of the infrastructure upgrade of agencies.

OPAP Agencies type A' and F' Committee composition

Position	Role
Executive Member of BoD	Chairman
Chief Operating Officer - Retail	Vice-Chairman
OPAP Stores Retail Team Director	Member
Sales Operations Team Director	Member
Retail Support Team Head	Member
Regulatory and Compliance Team Director	Member
Lawyer from Regulatory and Compliance Team	Member



OPAP Agencies type B' Committee

In 2018, "OPAP Agencies type B' Committee" was established. The Committee, having an advisory and consultative role to the company's Board of Directors, is responsible for evaluating issues related to OPAP PLAY stores. Consultative duties of the committee involve the termination of agency contracts, spatial planning for new agencies, provision of additional agencies to existing agents, introduction of new partners into the agencies' network and relocations.

Furthermore, it has executive powers regarding transfers, expansions, sublease of property, refurbishment of agencies, approvals for the provision of health-regulated or other services at an agency, consensual termination of the agency's contract and the support of agencies' infrastructure upgrade.

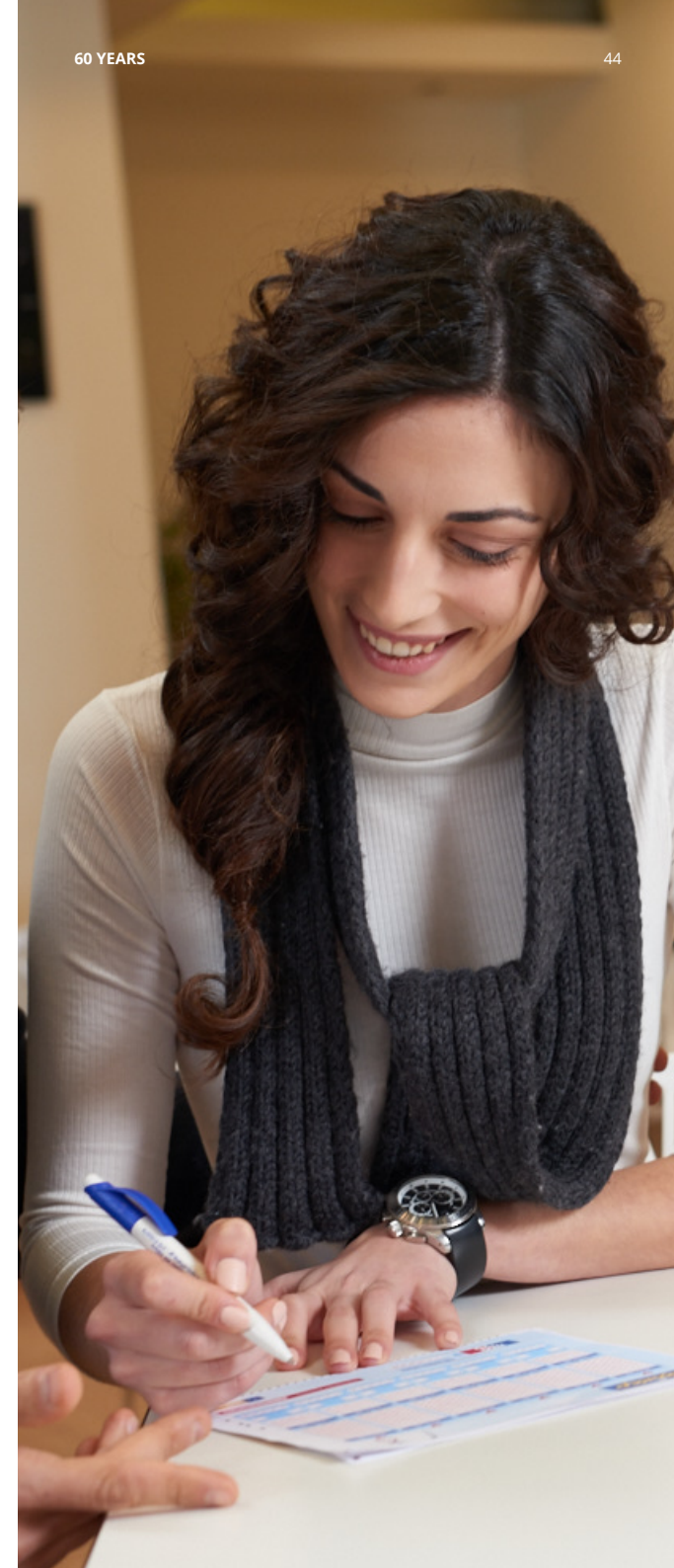
OPAP Agencies type B' Committee composition

Position	Role
Executive Member of BoD	Chairman
Chief Operating Officer - PLAY games	Vice-Chairman
Gaming Halls Sales Team Director	Member
Gaming Halls Operations Team Director	Member
Partners' Support Supervisor	Member
Regulatory and Compliance Team Director	Member
Lawyer from Regulatory and Compliance Team	Member

OPAP Agencies Compliance Committee

In 2018, the OPAP Agencies Compliance Committee was established, in order to assure the transparent implementation of the network's compliance monitoring process. OPAP network's compliance is a strategic priority for the OPAP Group. The Compliance Committee has an advisory and consultative role for the company's Board of Directors. More specifically, it has an advisory authority on matters such as the imposition of penalties and fines for agencies above a certain financial threshold, the termination of agency agreements and other relevant issues the Committee considers pertinent for the BoD to decide.

Furthermore, the Committee has executive powers on compliance matters, such as the issuing of written warnings and imposition of fines, the submission of proposals to the BoD for the imposition of severe sanctions, the management of non-compliant agencies, and the implementation of the compliance monitoring process.



OPAP Agencies Compliance Committee composition

Position	Role
Chief Corporate and Regulatory Affairs Officer	Chairman A
Chief Operating Officer - Retail A	Vice-Chairman
Chief Operating Officer - PLAY Games B	Vice-Chairman
Regulatory and Compliance Director	Member
Retail Excellence Team Director	Member
OPAP Stores Team Director	Member
Gaming Halls Sales Team Director	Member
Responsible Gaming Team Director	Member
Security and Risk Management Team Director	Member
Anti-Money Laundering Officer	Member
Network Regulatory and Compliance Manager	Member

Management Systems Committees

The Management Systems Committees, namely the Quality Management Committee and the Environment, Energy and Health and Safety Committee, are responsible for overseeing all activities related to our management systems and:

- Establish and substantiate OPAP's corporate policies relevant to the management systems.
- Decide on any corrective and preventive actions.
- Recommend improvement actions to the BoD.
- Secure adequate resources (materials and services).



OPAP Management Systems Committees composition

Position	Role	Quality Management Committee	Environment, Energy and Health and Safety Committee
Executive Member of BoD	Chairman / Top Management representative on Management Systems	✓	✓
Procurement and Quality Director	Member / Management Systems Representative	✓	✓
Quality Management Systems Team Head	Member	✓	✓
Total Rewards and Employee Relations Team Director	Member	✓	✓
Facilities Management Team Director	Member	✓	✓
Talent Acquisition and Development Team Director	Member	✓	
Infrastructure and Operations Team Director	Member	✓	
Customer Intelligent and CRM Team Director	Member	✓	
Customer Experience Director	Member	✓	
Chief Risk and Security Officer	Member		✓
Corporate Responsibility and Public Relations Director	Member		✓
Northern Greece Manager	Member	✓	✓

D.7 Corporate Responsibility Management

OPAP adopts a holistic approach to corporate responsibility, where the accountability for responsible operation lies within each department and each employee.

To assure the holistic and responsible management of our operational issues, we have established the appropriate organizational structures, as follows.

- At Board level, our corporate responsibility agenda is driven by the Chief Executive Officer.
- At organizational level the Chief Corporate and Regulatory Affairs Officer is responsible for identifying the strategic risks, setting standards and targets and reviewing the performance regarding corporate responsibility.
- At operational level, the Corporate Responsibility and Public Relations Director is responsible for cooperating with other departments in order to diffuse responsibilities, policies and practices, and has established a close collaboration with the Quality Systems Management Department.

We have also appointed specific executives who are responsible for mitigating risks as well as defining and sustaining the strategies that reflect our corporate responsibility objective, by coordinating and implementing relevant programs and activities.

Corporate Responsibility Management



A man in a white shirt is celebrating with a raised fist and a wide smile. He is surrounded by floating lottery balls and tickets. The background is a gradient of green and blue.

E. Company Value Creation

IN THIS SECTION

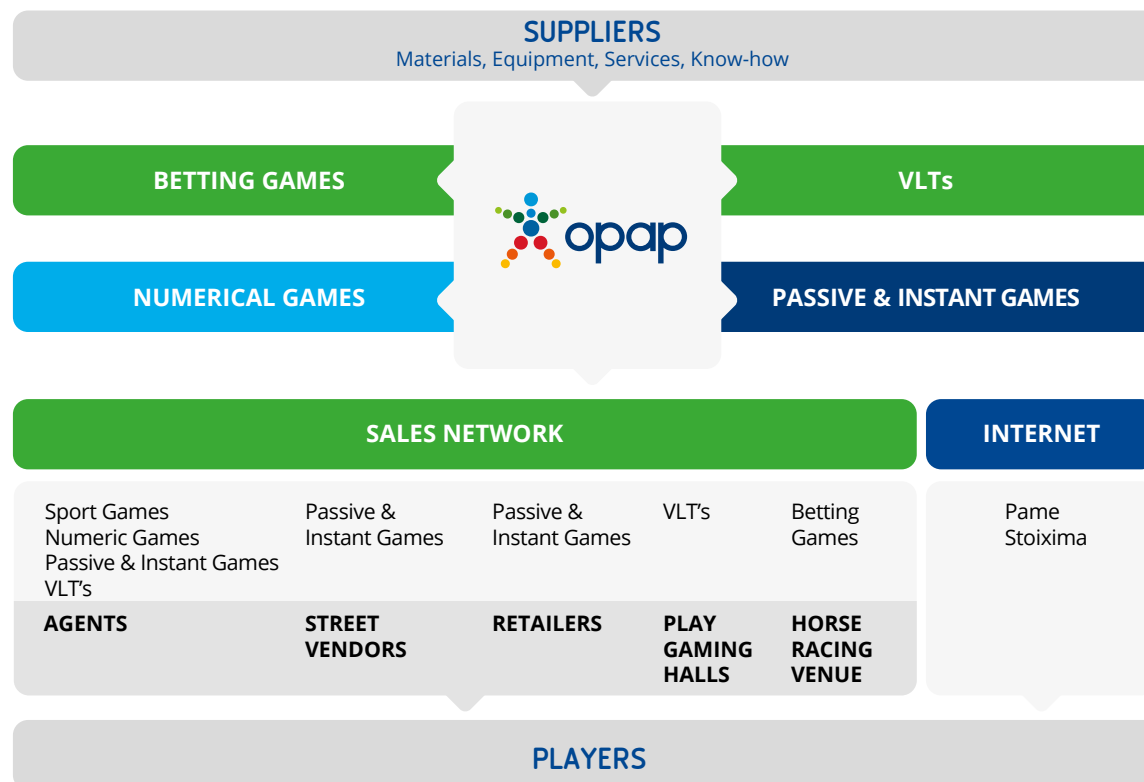
1. Business Model
2. How we Create Value
3. Operating Responsibly
4. Risk Management
5. Stakeholder Engagement
6. Customer Satisfaction

E.1 Business Model

We offer numerical and betting games. Betting games have the final amount of winning revenues fixed and made known at the time of betting, while in numerical games, all bets of a particular type are collected and then the yield is calculated by distributing the concentrated bets to the winners. To deliver our products and services, aside from our own operations, we utilize resources from our suppliers (materials, equipment, services and know-how), which are used to organize, operate and sustain our games of chance.

All our products and services are available through our sales network, which includes OPAP agencies (where we also provide the necessary equipment, IT systems and services such as training), street vendors and other various retailers (for selling SCRATCH tickets and passive lotteries) and PLAY Gaming Halls (for VLTs), as well as the Horseracing venue in Markopoulo. Especially for PAME STOIXIMA, players can also place their bets through a specially designed online platform (www.pamestoixima.gr).

Our operations



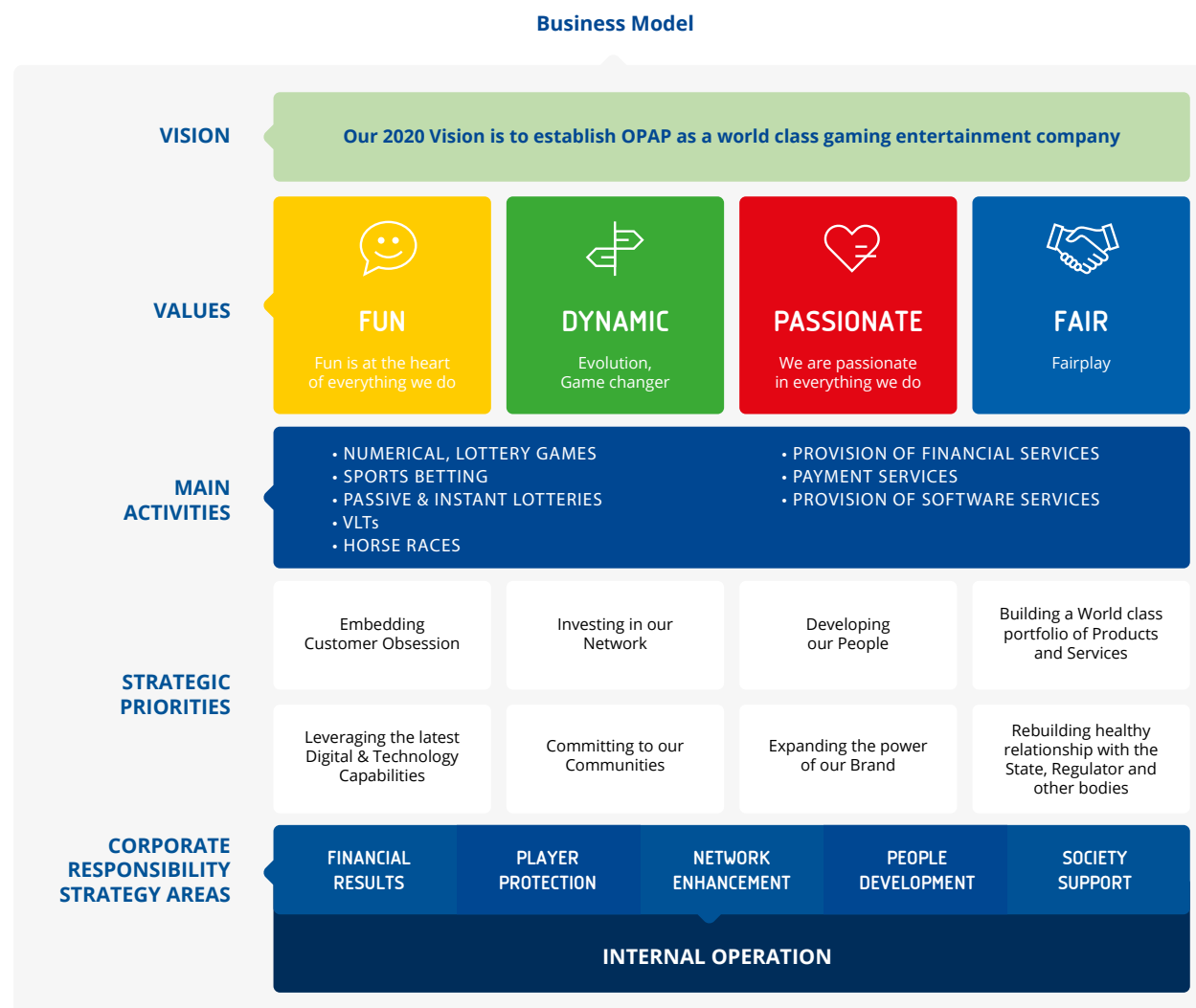
E.1.1 OUR BUSINESS MODEL

Our business model lays out the key decision-making foundations that govern our actions and initiatives in order to achieve our business goals, delivering top-quality products and services, fostering employee training and development, maintaining strong communication channels with our agents and suppliers and fulfilling our corporate responsibility mandate.

Our vision is to establish OPAP as a world class gaming entertainment company and ensure the company's growth, expansion of operations and profit generation. The foundation of the 2020 vision is underpinned by our 4-core values (Fun, Dynamic, Passionate and Fair). These values sustain our work-friendly working environment and motivate our employees throughout the Group.

We have established a set of 8 strategic priorities that will help us generate, capture and sustain value for the company and all our stakeholders, both in the short and long term, and at the same time safeguard OPAP's future success.

We operate under the World Lottery Association (WLA) and responsible gaming standards and strive to transform our business excellence into social contribution through an integrated corporate responsibility strategy, as visualized in the model presented below.



E.1.2 OUR VALUES

FUN

"Fun is at the heart of everything we do"

Every day, we create together opportunities to play, win, reward, celebrate and offer a unique entertaining experience to our customers. We combine pleasure and performance across our business while we encourage a healthy work and life balance.

DYNAMIC

"Evolution, Game changer"

We strive to excel, continuously re-invent ourselves and facilitate the growth of the gaming entertainment industry. As pioneers, we always seek to, innovative, inspire and offer a world-class experience to our customers.

PASSIONATE

"We are passionate in everything we do"

We work together as one team to deliver our common purpose of creating value for our stakeholders. We are customer-focused, operating with a bold and decisive attitude in providing the ultimate gaming experience and inspiring each other to achieve the best of ourselves.

FAIR

"Fairplay"

Our working environment is inclusive and of equal opportunities. We operate with respect and integrity, cultivate an open and transparent environment and solidify our position as a leading and trusted group of companies.



E.1.3 OUR STRATEGY

Guided by our 2020 vision to establish OPAP as a world-class gaming entertainment company, we have established our strategic framework, which is driven by 8 strategic priorities.



EMBEDDING CUSTOMER OBSESSION

OPAP is a consumer-facing business serving millions of customers. The customer is at the centre of everything that we do. So, we intensify our actions to understand our customer better, increase our internal focus and continuously respond to changing customer behavior.



INVESTING IN OUR NETWORK

Our network consists the basis of our business activities. OPAP aims to develop its agencies to be the customer's local entertainment destination through significant investments in the agencies themselves, introducing a number of products and services. The Company also puts emphasis on the alignment of its interests with those of its agents and on the increase of the level of support that is provided to them.



DEVELOPING OUR PEOPLE

Our people are one of the key assets of the Company. OPAP aims to build high-performing teams, attracting at the same time new talents to the Group, developing the existing people further through the expanded OPAP Academy program and creating stronger bonds between the Company and its people through a number of initiatives, including more regular two-way internal communications.



BUILDING A WORLD CLASS PORTFOLIO OF PRODUCTS AND SERVICES

Our aim is to offer a broad range of attractive, new and improved products and services for our customers and our network, researching ideas from around the global gaming world.



LEVERAGING THE LATEST DIGITAL AND TECHNOLOGY CAPABILITIES

The transformation of the role of Digital & Technology within the Group consists one of our objectives; we continue to invest in modern solutions, which will provide an improved level of control and flexibility to the ongoing delivery and improvement of OPAP's products for the customers, setting at the same time the basis for future strategy.



EXPANDING THE POWER OF OUR BRAND

The OPAP brand has a remarkable level of recognition both in Greece and Cyprus consisting one of our most important assets. By re-establishing our brand's identity and making the most of our powerful "anthropaki" logo, the Company can further extend the reach and impact of its brand, as well as strengthens its dedication to maintain a strong and consistent emotional connection with its customers.



REBUILDING HEALTHY RELATIONSHIPS WITH THE STATE, REGULATOR AND OTHER BODIES

OPAP intends to an ongoing and effective cooperation with the Regulator and other significant public sectors in local and international level, maintaining an open dialogue and establishing a better mutual understanding for items of common interest.



COMMITTING TO OUR COMMUNITIES

OPAP understands that it has an important role within the communities in which it operates both in Greece and Cyprus, targeting to the creation of long-term, meaningful benefit so as the Company contributes to building a brighter future. OPAP displays strong commitment for health, sports and employment. In addition, OPAP focuses on stakeholders' engagement. The Company adopts and develops the highest standards of integrity and responsibility which are part of an integrated Responsible Gaming strategy.

Benefiting from the foundations that have been set the previous two years, OPAP, along with its 8 strategic priorities, is further focusing in 2019 and beyond on certain initiatives within the following 5 pillars:

- **Entertainment**

OPAP team is working on offering ever-improving customer entertainment aiming to cement OPAP's position as true entertainment brand. Core of this initiative consist the offering of more engaging products and content, the continuation of REX 2020 in order to create outstanding customer experience, as well as the Company's brand further development to an entertainment brand.

- **Online**

We focus on accelerating online customer engagement and additional revenue generation through changing the game online, offering superior digital experience and accelerating delivery capabilities.

- **New ventures**

We aim to develop and introduce new services complementing gaming and attracting new customer by finalizing implementation of mainly TORA DIRECT S.A. and TORA WALLET S.A. related projects, by fully leveraging the OPAP network and by winning the customers.

- **Information**

Building registered customer databases and maximizing value by data analysis and insights generation consists the meaning of this pillar.

- **High Performance**

We are seeking further improvements both internally and across the various operating channels by further improving our network operations, enhancing the way we work internally and digitalizing our operations.



E.1.4 OUR CORPORATE SUSTAINABILITY STRATEGY

Our corporate sustainability comprises of 6 key focus areas. These focus areas reflect our mandate to achieve financial prosperity and create value for both society and the environment.

Internal Operation

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

See sections D. Corporate Governance & E. Company Value Creation

Financial Results

We seek to align our continuous support to society with healthy financial results, in order to facilitate a sustainable business. Therefore, we built our long-term corporate strategy in a transparent way that satisfies the needs of shareholders and the investment community, creates value for all stakeholder groups, contributes to the country's development and economic sustainability, while at the same time strengthens our presence in the gaming industry.

See section F.1 Achieving Financial Results

Player Protection

We understand that the 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.

See section F.2 Protecting our Players

Network Enhancement

Recognizing that we operate in a highly challenging economic situation, we dedicate our efforts to the development of our sales network and the creation of more work positions. Our aim is to place our customers as our top priority and provide the resources to improve our network partners' operations at every level.

See section F.3 Enhancing our Network

People Development

Our People are at the heart of everything we do, bringing value and contributing to the success of our long-term strategic objectives, which lead us towards our 2020 Vision. We are committed to create a unique experience for all OPAP People; one that reflects our high performing culture and our values. We focus on being a great place to work by placing our People at the center of our strategy.

See section F.4 Developing our People

Society Support

We believe that our role in society transcends our business activities and we have the responsibility to support social growth and prosperity. Thus, we are committed to support and benefit different stakeholders and underprivileged social groups, facilitate our supply chain's growth and responsible operation, as well as safeguard the environment and reduce our potential impact on climate change and resource use.

See section F.5 Supporting our Society

ACKNOWLEDGEMENT OF OUR SUSTAINABILITY PERFORMANCE



FTSE4Good

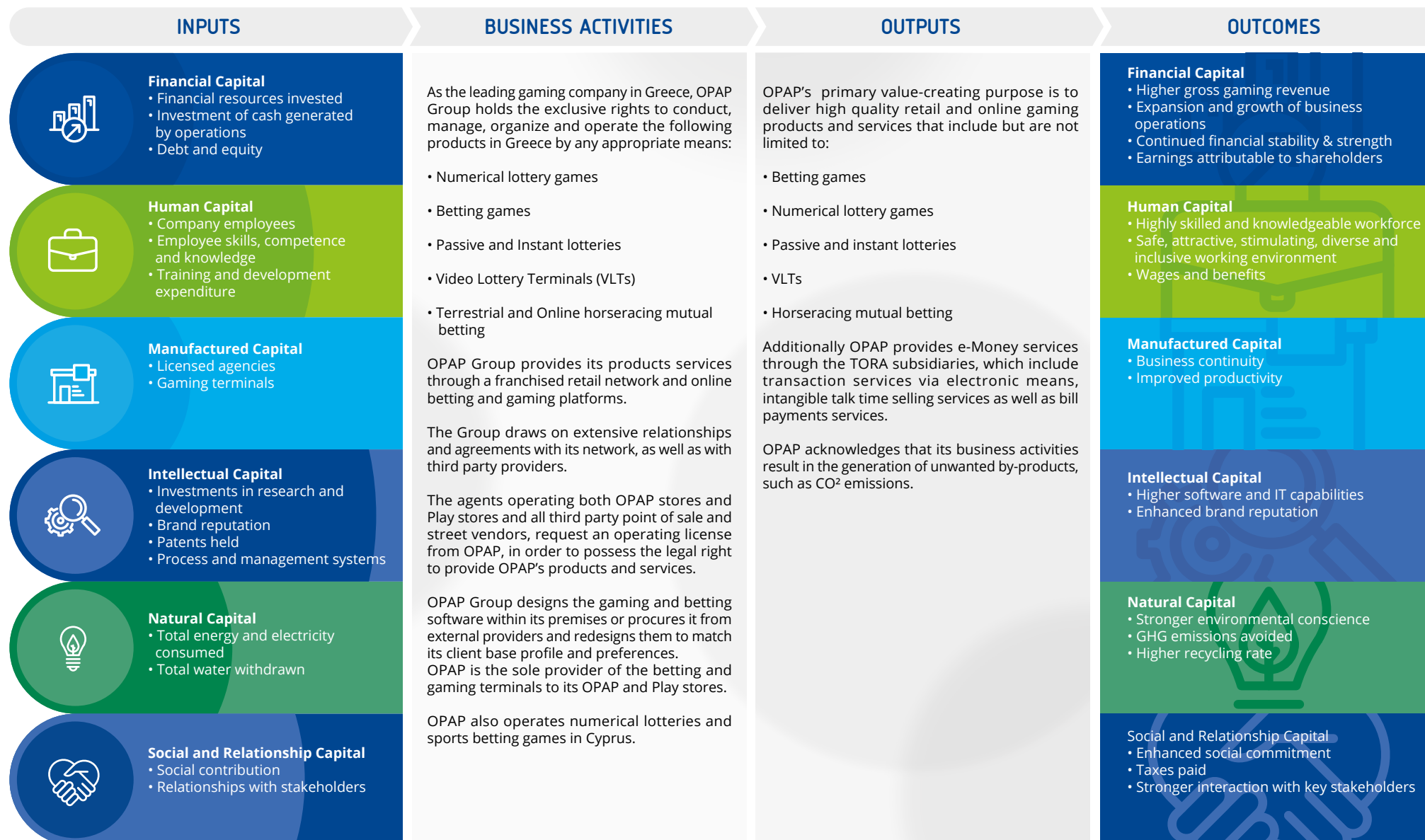
We communicate our corporate sustainability strategy and performance, and respond to investors and ESG analysts' requests for information.

OPAP has been included in the Financial Times Stock Exchange 4Good (FTSE4Good) Emerging Index, which assesses listed companies in emerging markets with a positive financial, environmental and social performance, based on a range of corporate social responsibility criteria.

Its inclusion in the FTSE4Good index demonstrates OPAP's commitment to build a comprehensive sustainability strategy by embedding sustainable ESG practices into its business management.

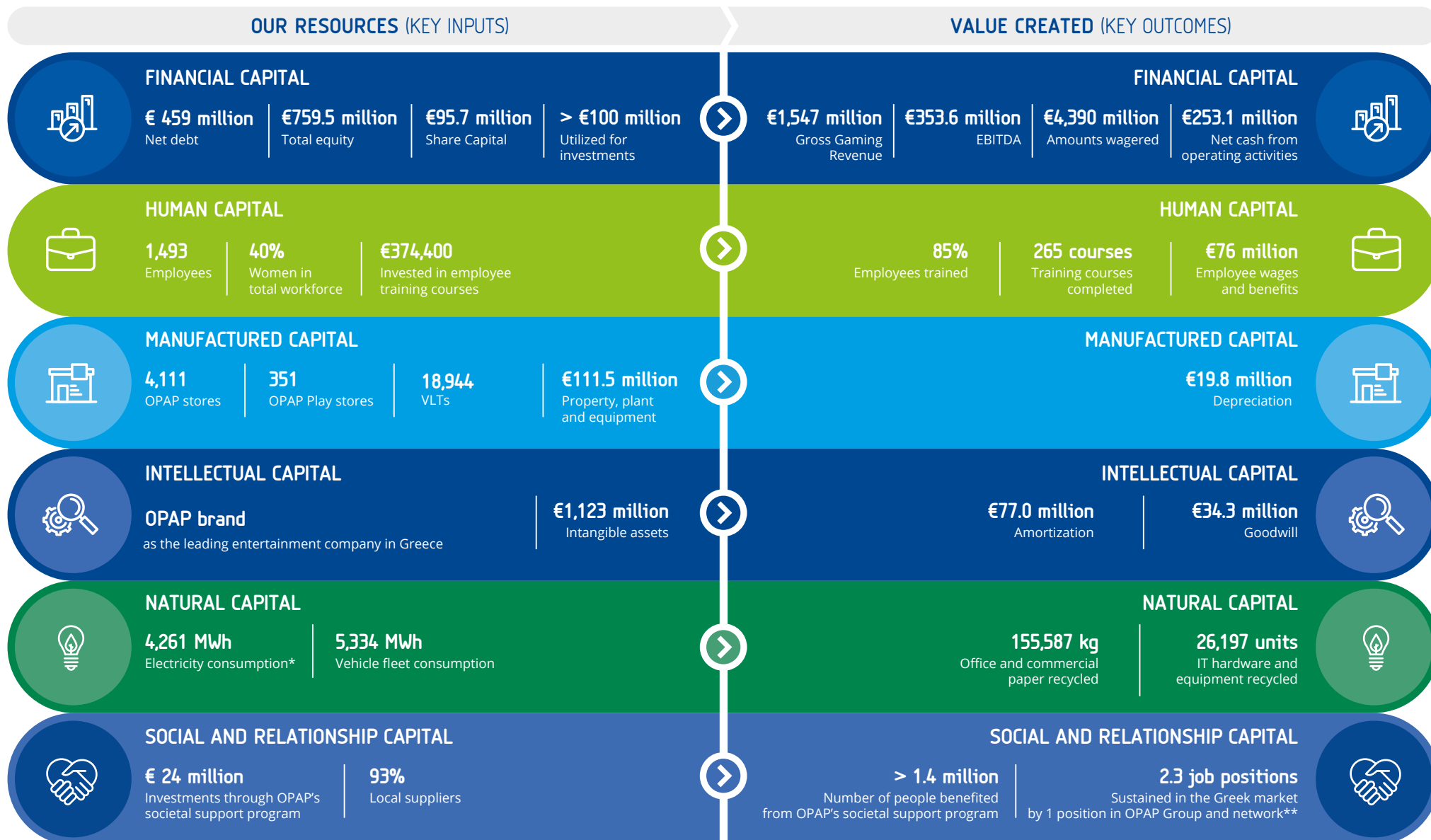
E.2 How we Create Value

Through our business model we create our top-market products and services and support our mandate of creating sustainable value for our stakeholders. Illustrated below is the value creation process of our business. It outlines how each form of capital is utilized and subsequently transformed through our business activities enabling the creation of value for OPAP and our stakeholders.



2018 Value Scoreboard

The scoreboard presents OPAP Group's 2018 key figures in Greece and Cyprus.



*OPAP Group Companies excluding Horse Races S.A.

**Source: Foundation for Economic and Industrial Research, May 2019.

E.3 Operating Responsibly

We recognize that in order to increase our performance in market we ought to have a decisive, disciplined and transparent working environment. Our objective is to set the correct guiding principles and ensure that our mission and values are sufficiently communicated among employees. Sound guiding principles can help OPAP serve the public interest and prevent the intangible value of its reputation from declining. Therefore, we have firmly established a range of standards and mechanisms that allow us to fulfill our objective and operate responsibly.

E.3.1 COMPLIANCE

We closely monitor the regulatory and legal framework related to our activities, in order to apply its relevant provisions. It must be noted that in 2018, there were no penalties imposed regarding compliance issues by respective regulatory authorities, such as the Hellenic Gaming Commission.

In 2018, OPAP concluded an agreement for the supply of a Compliance Module Application, which is expected to be completed within 2019.

Code of Conduct

Our **Code of Conduct** outlines the main principles and behavioral rules, as well as provides guidance to all members (i.e. Board of Directors, Chief Officers, managers and employees) on issues that may arise within OPAP. The Code was updated in 2018 and was communicated to all employees in early 2019. All employees were asked to acknowledge and accept its guiding principles and provisions. The code covers the following theme areas:

- governing principles and company values,
- operational framework,
- personal and business integrity,
- the resources of OPAP Group and its customers,
- people: respect for the individual, equal opportunities, diversity,
- whistleblowing: implementation - violations, whistleblowing complaints, and
- ensuring stakeholders' awareness.

The Code of Conduct strictly prohibits all employees to offer, solicit or accept gifts, donations, in cash or in any other form, and any benefit related to the performance of their duties. They may only be allowed to accept or offer non-cash gifts/hospitality of value not more than €150 arising out of customary business practices. In this case, pre-approval must be received from the immediate manager and the fact that a gift was offered or received must be reported to the Regulatory and Compliance Officer, who maintains a gifts and hospitality registry. Gifts should be transparent, infrequent and should not be offered or accepted during contractual negotiations, tender processes or if aware that one is imminent with a supplier. Offering hospitality/tickets to events should be solely for the purpose of OPAP Group employees building business relationships. It is important that gifts or hospitality never influence business decision-making processes, or cause others to perceive an influence. OPAP Group is committed to maintaining the highest standards of ethics and integrity in the way it does business in Greece and Cyprus. Fraud, bribery and corruption in all forms are illegal and unacceptable.

It must be noted that in 2018 there were:

- 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.



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.

Raising Concerns and Whistleblowing

The Company is committed to conduct its business with honesty, integrity and fairness and expects all stakeholders to maintain these high standards. However, all organizations face the risks of things going wrong from time to time. The company has established the Whistleblowing Complaints Policy by which employees can and should report valid allegations of known or suspected improper activities, in good faith and without the fear of retaliation, to their immediate manager and the Regulatory and Compliance Officer respectively.

Any person can file a complaint or concern in one of the following ways:

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

Complaints received under the Whistleblowing Complaints Policy will be reviewed under the oversight of the Audit Committee, by the company's Regulatory and Compliance Officer, the Internal Audit Team, or such other persons as the Audit Committee or the Regulatory and Compliance Officer determine to be appropriate.

The above policy aims to encourage people to immediately report suspected incidents and guarantees that their concerns will be taken seriously and investigated as appropriate.

In 2018, two complaints were raised through the whistleblowing mechanism in relation to OPAP's human resource's policies and processes. Both complaints were dealt with and were subsequently closed.

Internal Rules and Regulations

Our [Internal Rules and Regulations](#) are prepared in compliance with the applicable legislative framework, based on the company's Articles of Association. They describe the way we regulate the organization and functioning of the company in order to ensure:

- Business integrity.
- Transparency of business activities.
- Control over management and how management decisions are made.
- Compliance with legislation and the Concession Agreement's obligations.

In 2018, following significant changes of the provisions of Law 4548/2018, OPAP proceeded with the update of its Internal Rules and Regulations, which are expected to be finalized within 2019. However, the Policy on the handling of inside information and the prevention of market abuse, which constitutes part of the Internal Rules and Regulations, has been updated and approved.

Adhering and Following Fair Competition Rules

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

Additionally, 24 online gaming operators, who are not licensed in Greece but hold gaming licenses from other EU Member States, are allowed to provide services in Greece pursuant to Law no. 4002/2011, establishing a transitory regime.

We recognize our responsibility to follow fair competition practices and refrain from engaging in any activities non-compliant with competition law. Indicatively, within this context we:

- Comply with the relevant competition laws and legislation.
- Do not adopt illegal or unethical business practices.
- Do not allow our employees to share confidential information with third parties.
- Enable all our employees to seek guidance or advice from the Regulatory and Compliance Officer regarding activities which could potentially breach competition law.

In 2018, OPAP did not receive any antitrust complaint or complaint regarding anti-competitive behavior or monopoly practices, as well as any fines or non-monetary sanctions on these issues. Agents who refused to sign the new OPAP Agency contract submitted several petitions for interim measures / law suits claiming that OPAP, has breached competition law in force, by terminating their agency contracts in February and March of 2017. All respective petitions for interim measures (temporary orders) were rejected by competent courts. With regards to pending law suits, two decisions have been issued by the Athens First Instance Court by virtue of which respective argumentation raised by the claimants was rejected.

Regulatory administrative decisions touching upon OPAP's gaming business are sometimes challenged before the Supreme Administrative Court, often on the basis of alleged violations of antitrust law or state aid. Where necessary, OPAP files pleadings, showing that the arguments set out in the petitions for annulment and other relevant litigation documents are mistaken or false. No adverse decision was issued in 2018.

Also, note that in 2018:

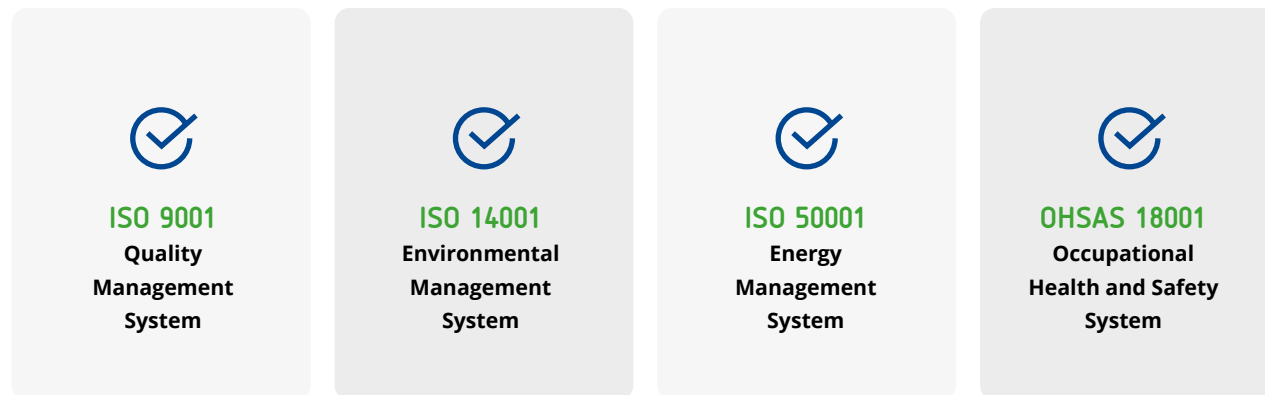
- OPAP made filings to Greek and foreign regulatory and competition authorities regarding the Stoiximan transaction.
- OPAP, following a request from the Hellenic Competition Commission regarding further clarifications on the responses that OPAP gave five years ago in relation to a competition complaint, provided the Commission with the necessary additional information on the matter.

E.3.2 INTEGRATED MANAGEMENT SYSTEM

At OPAP S.A. we implement an Integrated Management System (IMS) in accordance to international standards. Each of the [four sub-systems](#) takes into consideration the structure and requirements of the other systems. Within the context of our IMS, we operate the following systems:

- ISO 9001 Quality Management System certified by Lloyd's Register Quality.
- ISO 14001 Environmental Management System certified by Bureau Veritas.
- ISO 50001 Energy Management System, certified by Bureau Veritas.
- OHSAS 18001 Occupational Health and Safety System certified by Bureau Veritas.

Integrated Management System



It must be noted that within 2018, we:

- Implemented a certified Energy Management System according to ISO 50001.
- Trained new employees on our Management Systems through the Corporate Induction program ([see section F.4.4 Training and development](#)).



E.3.3 ANTI-MONEY LAUNDERING

We comply with applicable framework and the Hellenic Gaming Commission's Decision no. 129/2/2014, as currently in force, which introduced measures to prevent money laundering and terrorist financing in the gaming sector.

OPAP has a ["Policy on the prevention of the use of OPAP gaming products for the purpose of money laundering and terrorism financing"](#) in place for OPAP S.A., Hellenic Lotteries S.A., and Horse Races S.A. which applies to all employees, agents and salesmen of OPAP products. The AML/CTF Policy describes a set of principles and procedures to minimize the risk of using OPAP's products for money laundering and terrorism financing.

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 AML risks and submit recommendations to the Board of Directors, in order to effectively mitigate those risks. The Board of Directors also receives and assesses an AML semi-annual Report with the actions and the measures taken to prevent money laundering and terrorism financing.

AML/CTF Audits

OPAP conducts regular audits to internal stakeholders and its network, in order to ensure their compliance with the Policy and the AML requirements

During these audits, we review the following:

- Compliance with procedures to collect, update and maintain players' data.
- Proper implementation of the Know your Customer (KYC) procedure for new and existing players.
- Compliance with procedures to identify and report suspicious transactions.
- Proper record keeping.
- Review of player behavior in order to provide winning certificates to players.

Furthermore, we have introduced a digital platform (winningscertificates.opap.gr), which enhanced our KYC and AML procedures with regards to issuing winnings certificates and significantly improved the efficiency of the issuing process.

As a result of the above-mentioned practices, within 2018, we:

- Performed AML audits to our whole network.
- Imposed monetary fines to agents regarding identified violations of procedures
- Imposed fines regarding non-compliance with law and regulations to our agencies.
- Submitted reports to the Hellenic Financial Intelligence Unit pursuant to applicable legal framework.
- Issued 19 written warnings to specific agencies due to violations of gaming regulations related to financial transactions.

In 2018, no legal actions regarding incidents of money laundering and terrorism financing were taken against OPAP and no fines or sanctions were imposed to OPAP for AML/CTF issues. We had no incidents of contract termination or no renewal due to money laundering violations.

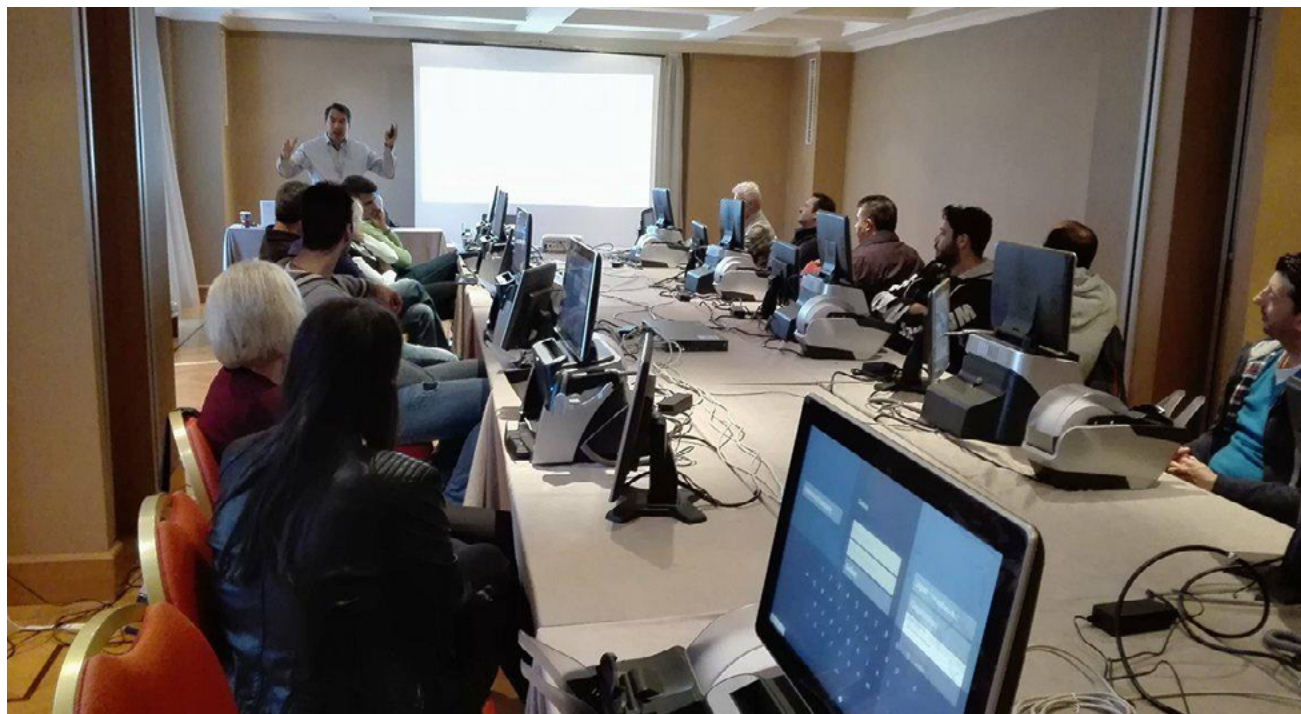


AML/CTF Trainings

We provide continuous training on AML/ CTF issues for our employees and agents and we inform and notify them in case there are changes in the regulatory framework.

Within 2018:

- The AML Team attended a series of training courses.
- We organized a mandatory AML e-training course for the whole network that started in 2018 and is expected to be concluded in 2019.
- We communicated messages to the entire retail network to inform them about their key obligations under the AML Regulation and our relevant AML Policy.



FRAUDULENT ACTIVITY

In 2014, we established the Antifraud team, which cooperates end-to-end with all teams across the company and is responsible for the investigation and tackling of internal and external fraudulent activities across the OPAP network and all its subsidiaries and products. Furthermore, the team cooperates and reports any findings of fraudulent nature to the authorities and responds to their inquiries.

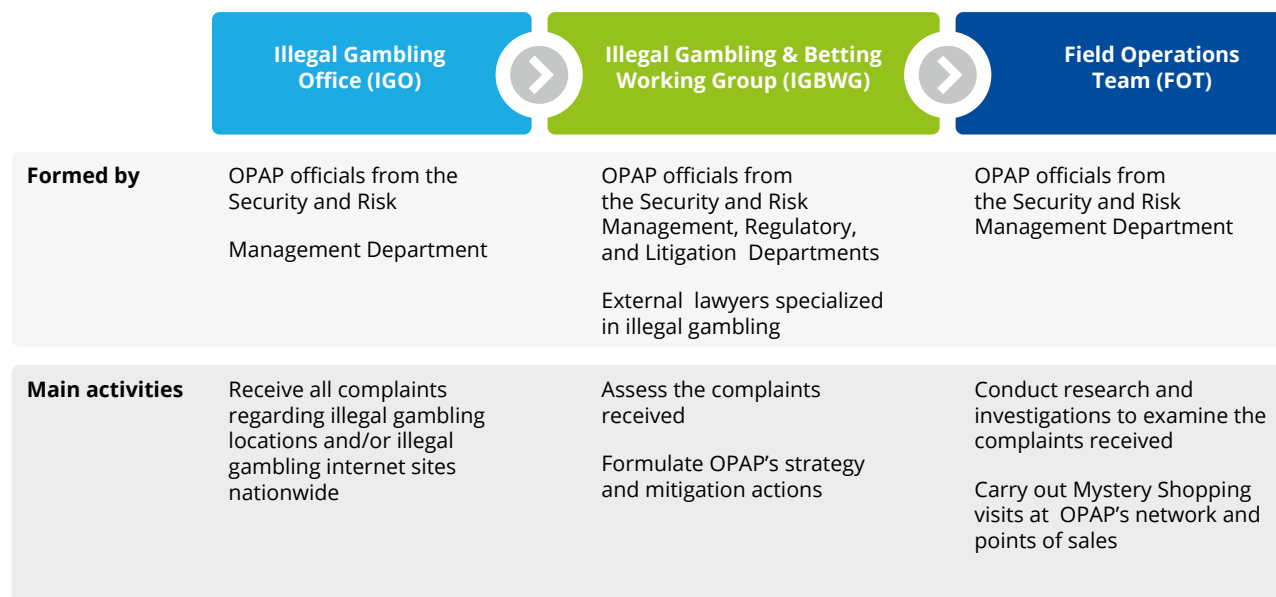
The analytics mechanisms set up by the Antifraud team during the launch of the new Pamestoixima.gr online platform in 2018, covered 30% of the online customer data base. 92% of the financial transactions were reviewed for potential fraud, resulting to risk mitigation actions that covered over 2.6% of the customer data base.

At the same time, the Antifraud team ensures that none of the benefits of the incentive schemes offered by OPAP to its customers have already or will in the future be abused or manipulated by high risk customers.

E.3.4 ADDRESSING ILLEGAL GAMING

Acknowledging our role as the leading gaming company in Greece, we strive to address the issue of illegal gambling in the market. Illegal gambling practices not only endanger the industry's reputation but also more importantly, the players' wellbeing.

Therefore, we make every effort to support the authorities in their battle against the illegal gambling phenomenon, either online or offline, and at the same time work towards establishing a fair and accessible-to-all gaming environment that offers entertainment to the general public.



The Illegal Gambling Office (IGO), internally established in 2017, is responsible for receiving all complaints regarding illegal gambling activities nationwide. Complaints can be reported through its reporting telephone lines, on 210 5798362 and 210 5798363, and through email at igo@opap.gr. The IGO collaborates with the Illegal Gambling and Betting Working Group (IGBWG) and supports it in drafting the strategy of the company regarding the mitigation of the illegal gambling phenomenon.

The IGBWG, also established in 2017, meets every week and deals with the complaints, received by the IGO regarding illegal gambling locations and/or illegal gambling internet sites. The IGBWG assesses the cases and decides on the best course of action as well as formulates OPAP's strategy against illegal gambling.

Apart from formally forwarding all complains to the relevant authorities, the Security and Risk Management Team of OPAP, assists the authorities by deploying the Field Operations Team (FOT). The FOT, established in 2017, conducts further research and investigations to examine the complaints received, in order to gather additional market intelligence that can be of use to the relevant authorities. In addition, the FOT carries out Mystery Shopping visits at OPAP's agencies and Gaming Halls. FOT is also responsible for:

- Giving official testimonies regarding illegal locations and/or websites for which FOT members have gathered market intelligence. Alternatively, an official complaint is forwarded to the relevant authorities, signed by the head of OPAP's Security and Risk Management Department. The testimonies of the FOT members are given to local prosecutors and/or police authorities (i.e. Financial Police, Cyber Crime Unit etc.), as stated in the guidelines provided by IGWG.
- Continuing to monitor, locations and websites that have operated or operate illegally, on a regular basis, providing updates to the authorities, regarding any developments.



ADDRESSING ILLEGAL GAMING IN 2018



178

complaints were received about potential illegal gaming locations.



143

confirmed unique illegal gaming / betting locations were identified.



109

unique illegal gaming / betting locations discontinued their operation.



1,661

illegal betting sites were reported to HGC and included in its Blacklist (i.e. in the list of websites to which access through a Greek IP is prohibited)



31

complaints were sent to local prosecutors or/and police authorities.



92

affidavits were provided by FOT.

Inspecting our Points of Sale

We defined an explicit internal Mystery Shopping Process in order to realize the optimal monitoring of our network given the available resources.

The main goal of the new process is to provide checks and balances and thus a clear view of our network, making sure that Rules and Regulations like Responsible Gambling are adhered nationwide.

This is achieved by uniformly issuing Mystery Shopping visits across our entire network – OPAP agencies, PLAY Gaming Halls and Hellenic Lotteries points of sale.

In addition to Mystery Shopping visits, we perform CCTV footage reviews, exclusively for the OPAP PLAY network, that further support the monitoring of compliance to Regulatory and Compliance policies and procedures.

Raising Awareness

In 2018, OPAP raised awareness about illegal gambling by:

- Conducting training sessions to all staff members of OPAP's call centers and offering them informative leaflets.
- Participating in nationwide roadshows and informing its agents about the IGO and FOT, thus actively engaging with them in maintaining a constant flow of information on the topic and subsequently enabling OPAP to monitor the phenomenon throughout the country.
- Communicating IGO's contact details to the entire network via OPAP network terminals.
- Informing OPAP's Area Sales Representatives about the illegal activity in their respective areas of responsibility, while receiving valuable feedback.
- Actively participating at the first ever scientific event on the Criminal Treatment of Illegal Gambling, organized in Greece with the Security and Risk Management Team Director being one of the speakers, stating the actions and initiatives of OPAP at the field in question.

FOT'S INSPECTIONS AND MYSTERY SHOPPING VISITS AT OPAP STORES IN 2018



4,298

inspections and Mystery Shopping visits were conducted at our sales points, covering 58% of the total number of OPAP agencies and PLAY halls.



2,166

CCTV footage reviews were conducted, covering all OPAP PLAY Gaming Halls.

E.4 Risk Management

We apply extensive internal controls and risk management systems. Internal controls and audits are planned based on identified risks and the results of the internal audits are also fed back to the risk management process.

Internal Controls and Audits

We have established a System of Internal Controls based on best international practices, designed to assure we will achieve:

- **Efficiency and effectiveness of the work.**
- **Reliability and completeness of the financial and management reporting.**
- **Compliance with the applicable legal and regulatory framework.**

Following the results of internal audits conducted within 2018, all findings were taken into consideration and the appropriate teams decided upon the design and implementation of corrective measures.

Risk Management

We follow a comprehensive annual enterprise wide and systematic approach to identify, measure and prioritize key risks that may affect the achievement of our strategic objectives.

The risk registry incorporates elements of the Internal Controls – Integrated framework (COSO model 2013). We have identified 10 major risk categories, each of which comprises of relevant subsequent risks. These risks are identified through workshops and one-on-one interviews with all Chief Officers. Each Chief Officer evaluates the likelihood and the severity of the risks relevant to his/her department and provides information on the corresponding mitigation and control measures. The Chief Officers are required to evaluate both the inherent and residual impacts of each risk.

To evaluate the scoring provided by the Chief Executives, OPAP also calculates the residual impacts, taking into consideration the inherent impacts and the effectiveness of existing actions and controls, based on the findings of internal audits. If major differences are observed between the results of the 2 methods followed to identify the residual impact, additional meetings are organized with the Chief Executives to identify the reasons of differences and reach to a scoring verified by both methods.

In 2018, the Executive Committee evaluated the risk registry and the assessment results against OPAP's strategic objectives. The results were reviewed by the Audit Committee and the CEO.

The main risks and measures identified for 2019 are presented in the following table.

In 2018,

the Executive Committee evaluated the risk registry and the assessment results against OPAP's strategic objectives. The results were reviewed by the Audit Committee and the CEO.

The main risks and measures identified for 2019 are presented in the following table.

Risk Category	Risk	Existing Measurements/New Mitigating Actions
Strategic External	<ul style="list-style-type: none"> • Competition Risk • Customer Wants Risk • External Fraud Risk • Regulatory Risk • Technological Innovation Risk • Sovereign-Country-Political Risk 	<ul style="list-style-type: none"> • Development of new products, by using new technology, to increase customers and customer loyalty • Established a risk and security team that monitors external fraud risks
Strategic Internal	<ul style="list-style-type: none"> • Business Model / Planning / Strategy Risk • Business Portfolio Risk • Organizational structure Risk • Succession Planning Risk 	<ul style="list-style-type: none"> • Implemented the “Strategic Priorities” program • Developed a dedicated project and product teams, and introduced KPI dashboards to identify early trends and ensure that the products are not outdated • Completion of successive resource planning
Strategic Sustainability	<ul style="list-style-type: none"> • Reputation, Image and Branding Risk • Shareholders Value Risk 	<ul style="list-style-type: none"> • Monitoring of specific KPIs and targeted communication with stakeholders • Disclosure of non-financial information using GRI Standards • Enactment of the ISO certified management systems
Compliance	<ul style="list-style-type: none"> • Anti-Money Laundering Risk • Compliance Risk • Privacy Risk • Responsible Gaming Risk 	<ul style="list-style-type: none"> • Monitoring of the correct implementation of the new Corporate Law requirement by the Legal Team • Appointment of a data protection officer, along with the establishment of relevant procedures
Operational- People	<ul style="list-style-type: none"> • Performance Incentives Risk • Skills and Knowledge Development Risk 	<ul style="list-style-type: none"> • Establishment of goals, development of plans and performance appraisals for all Group employees • Provision of e-learning material related to the Group processes, ethics and culture



Risk Category	Risk	Existing Measurements/New Mitigating Actions
Operational- Information	<ul style="list-style-type: none"> • Confidentiality Risk • Technology and Systems Changes Risk • Availability Risk • Data Integrity Risk 	<ul style="list-style-type: none"> • Monitoring of high availability third party Service Level Agreements (SLA) • Monitoring of the GDPR action plan by the Data Protection Officer • Instalment of anti-tampering systems • Deployment of Technology and Systems Changes procedures • An Information Security Officer was formally appointed, along with the creation of an Information Security Forum, in order to further ensure the effectiveness and efficiency in handling Information Security Risks.
Operational- Process	<ul style="list-style-type: none"> • Business Interruption Risk • Capacity / Scalability / Performance Gap Risk • Channels Effectiveness Risk Customer / Agent Satisfaction / Relationship Management Risk • Process Risk • Product / Service Failure Risk • Third Party Management / Outsourcing Risk 	<ul style="list-style-type: none"> • Monitoring of long-term outstanding receivables on a regular basis • Monitoring of each shop on a monthly basis by sales representatives, providing guidelines and support, when needed • Resolution of player related issues by VLT and sports betting online management • Established dedicated project and product teams, with a special delivery plan to be followed • Implementation of third part management and SLA monitoring processes
Reporting-Credit	<ul style="list-style-type: none"> • Credit Concentration Risk • Settlement Risk 	Processing of agents' settlements through the TORA payments gateway by the Credit Team, TORA Operations and Product Team
Reporting-Financial	<ul style="list-style-type: none"> • Budget and Planning Risk • Operations Measurement Risk 	Budget forecast preparation, monitoring and revision by the new Central Analysis and Reporting Team
Public Reporting	<ul style="list-style-type: none"> • Financial Reporting Risk 	Provision of assurance of Financial Statement figures by a big four audit firm



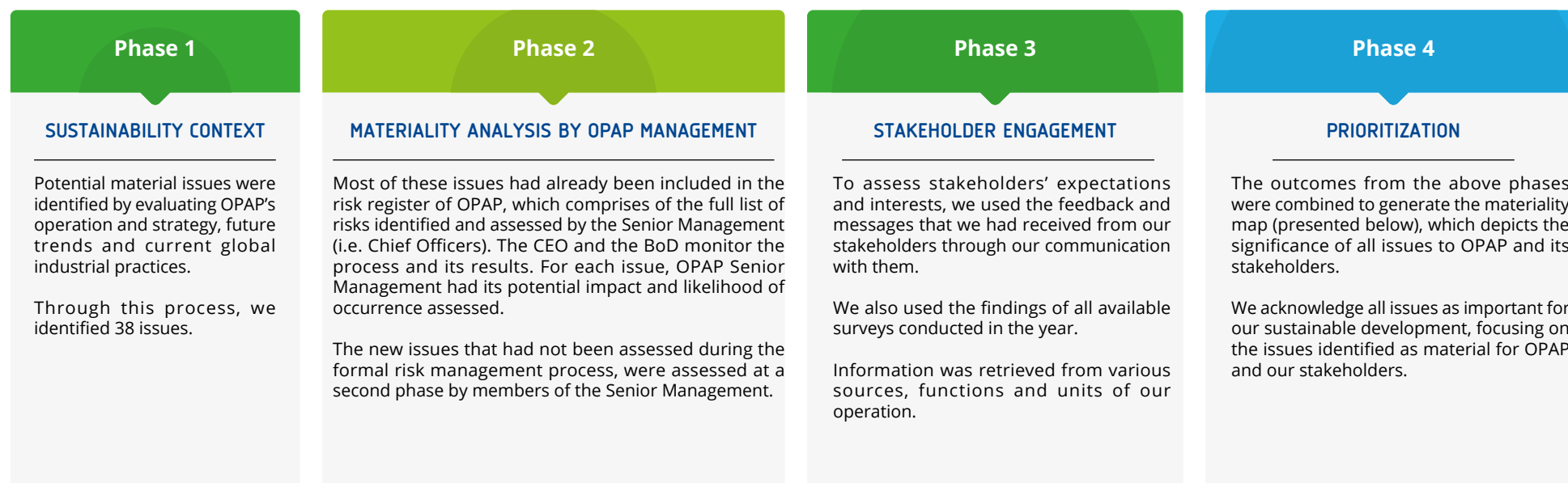
Ensuring Business Continuity

In order to ensure our uninterrupted operation, we:

- Have included our information security requirements, related to continuity, in our Business Continuity Management Policy.
- Have identified, classified and rated processes and information assets for their required recovery time and point objective, during our Data Asset inventory's development.
- Have developed disaster recovery plans for critical and essential information systems and infrastructure and have established alternative sites/facilities to support recovery of business operations and IT systems at any time.
- Follow specific backup policies for information and information systems.
- Use systems that guarantee high availability for critical business applications related to games' operations and availability.

Identifying the most Material Issues for our Sustainable Operation

OPAP is continuously informed about the global economic, environmental and social issues that are surrounding the business community and strives to ensure that these global issues are taken into consideration during the development of our sustainability strategy. As the leading gaming Company in Greece we acknowledge the sheer size of our business operations and the subsequent impacts it can incur on the economy, the environment and society. Therefore, we identify the issues that are most material for our sustainable development and our stakeholders. In 2017, we identified and prioritized these issues through a 4-phase methodology, as follows:



OPAP Materiality Map



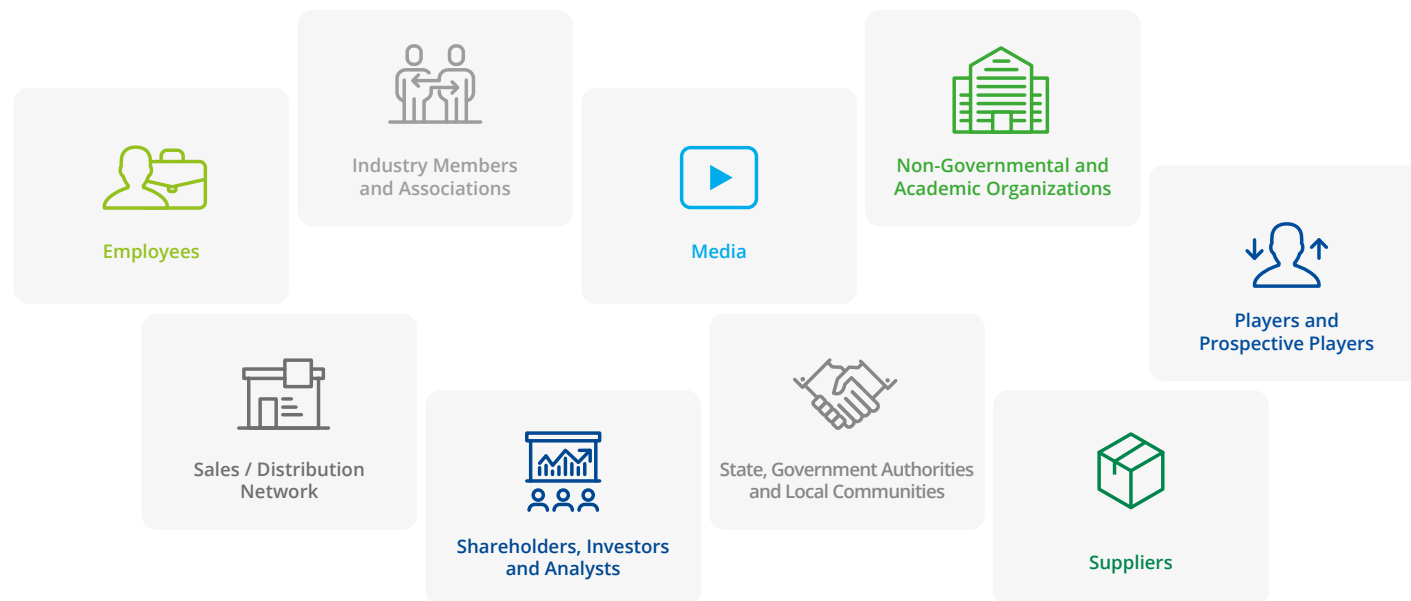


E.5 Stakeholder Engagement

Stakeholders are defined as anyone who influences or is influenced by our operations, throughout our value chain and across our operations. It is of paramount importance for OPAP to conduct a systematic and regular dialogue with them, in order to respond to their needs and expectations, in an effort to improve ourselves, both in the short and long term.

In 2018, we reviewed our stakeholder groups and decided to reconfigure them, by merging some of the initial groups to new ones. This will enable us to improve our stakeholder engagement process.

The stakeholders recognized by OPAP are:



Through our engagement with our stakeholders we utilize a range of methods of interaction to understand their main issues of interest.

Employees

Our employees are our most valuable asset. To understand our employees, we conduct an annual employee survey to gain feedback on our employees' attitude, motivation and satisfaction with regards to our operations. We have found that the main issues of concern for our employees are the issues of code compliance, health and safety, equality and fairness and labor practices. We actively communicate with our employees, on a daily basis, using internal communication means such as regular e-mail announcements and monthly internal newsletters.

Promoting our values to our employees is also a very important part of our ethos. Therefore, we organize internal awareness campaigns, on a semimonthly basis, corporate and social events and encourage our employees to participate in them.

See sections E. Company Value Creation and F.4 Developing our People

Players and Prospective Players

We firmly abide to our mandate of promoting responsible gaming and responsible communication by using various means of communication. We communicate the principles of responsible gaming to our customers and the general public by posting regular posts on social media, organizing awareness campaigns and by publishing press releases and articles on our website. In addition, we carry out annual customer satisfaction surveys, via our contact center, to learn more about our customers' experiences with our products and services.

Our engagement practices with our customers and the general public have revealed highly instructive results and show that the key issues that concern them are customers' privacy, the company's donations and societal support activities and its business entrepreneurship activities.

See sections E.6 Customer Satisfaction, F.2 Protecting our Players and F.5.1 Responsible Donations and Sponsoring

State, Government Authorities and Local Communities

We heavily invest in our relationships with the State, Government Authorities and the Local Communities in the areas we operate. Our engagement practices with this group of stakeholders involve regular face-to-face meetings, presentations and the publication of corporate reports.

The key concerns raised by these stakeholders include but are not limited to: corporate governance, anti-corruption, network compliance, responsible gaming, donation and support and environmental compliance.

See sections D. Corporate Governance: D, E.3 Operating Responsibly: E.3

See sections F.1 Achieving Financial Results, F.2 Protecting our Players, F.3 Enhancing our Network and F.5 Supporting our Society



Industry Members and Associations

OPAP is an active and devoted member of the European Lottery Association and the World Lottery Association. We adhere and abide to the established regulations and standards and promote responsible gaming practices. We actively engage with these bodies by arranging meetings and establishing formal communication channels.

The issues that are of great concern for these bodies are: compliance with competition law, customer privacy, money laundering, network compliance, responsible gaming and responsible communication.

See sections E.3 Operating Responsibly and F.2 Protecting our Players

Shareholders, Investors and Analysts

We heavily invest in our relationships with the State, Government Authorities and the Local Communities in the areas we operate.

Our engagement practices with this group of stakeholders involve regular face-to-face meetings, presentations and the publication of corporate reports. The key concerns raised by these stakeholders include but are not limited to: corporate governance, anti-corruption, network compliance, responsible gaming, donation and support and environmental compliance.

See all sections of this Report

Media

OPAP's most valuable intangible asset is its brand's reputation and the subsequent value of its products and assets. Therefore, we work on preserving our reputation as the leading gaming company in Greece and Cyprus by actively communicating with journalists and the public media on topics that reflect company's performance across the board.

We communicate our work through regular press releases, articles press conferences and by organizing special events and meetings.

See sections D. Corporate Governance: D, E.3 Operating Responsibly: E.3



Non-Governmental and Academic Organizations

Supporting our work to create a positive impact on the society, are our partnerships with local and international NGOs, institutions, academic organizations and treatment providers. OPAP through its partnerships delivers societal support programs and provides financial support. We engage with these organizations by organizing meetings and collaborations. We also promote OPAP's and the organizations' societal work by updating our website and posting relevant posts on social media.

The key issues that concern the non-governmental and academic organization we work with, include but are not limited to anti-corruption, public involvement, corporate responsibility, responsible gaming, waste handling and equality and fairness.

■ See sections D. Corporate Governance: D, E. Company Value Creation, F.2 Protecting our Players, F.4.2 Equality and Fairness and F.5 Supporting our Society

Sales / Distribution Network

OPAP's licensed agents, street vendors and retailers are the immediate administrators of our products and services. We place great importance on their work and thus continuously communicate with them to help them develop their capabilities. We organize one-to-one meetings, awareness campaigns and offer training schemes to disseminate material regarding responsible gaming and new products and services.

From our continuous communication we have found that the issues that concern our partners in our sales network include, but not are not limited to, customer satisfaction, customer privacy, money laundering, network compliance, responsible gaming, responsible communication and economic transparency.

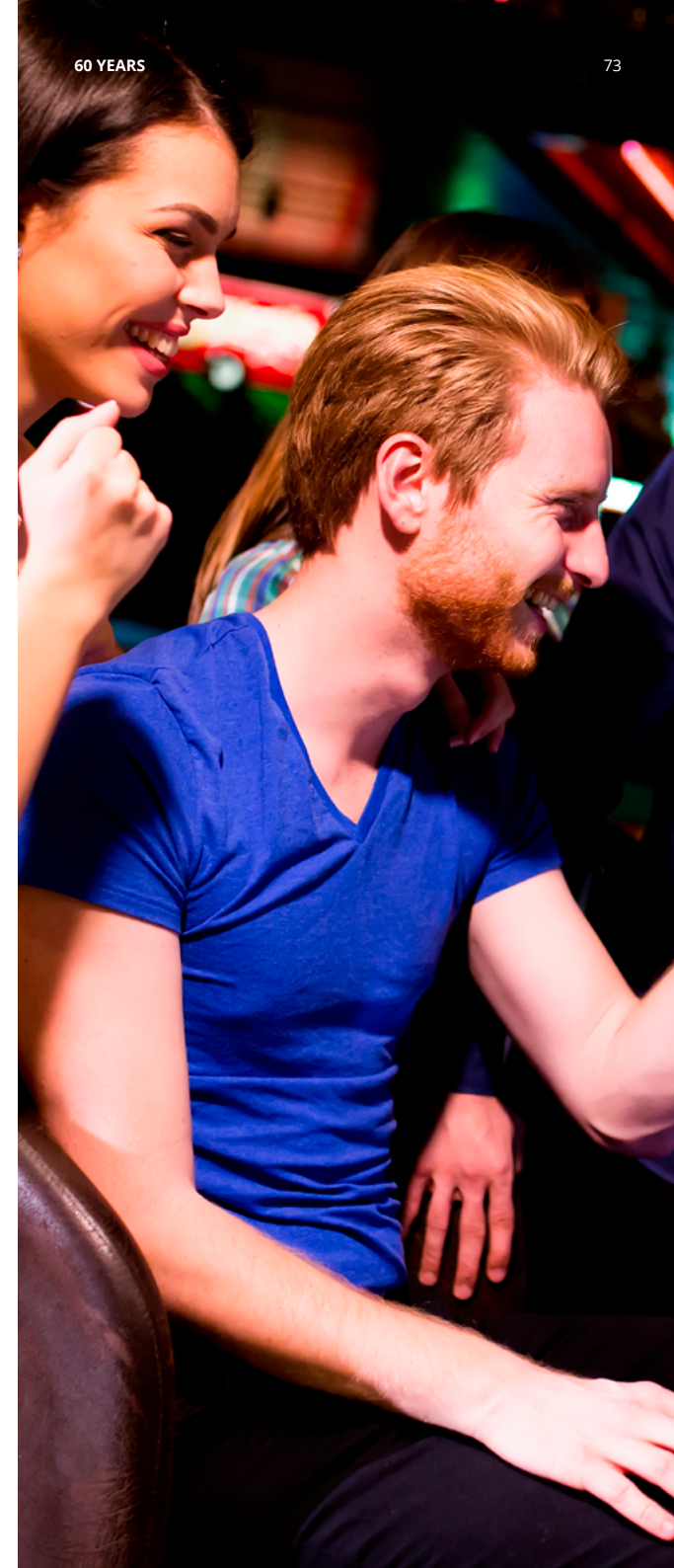
■ See sections E. Company Value Creation, F.1 Achieving Financial Results, F.2 Protecting our Players and F.3 Enhancing our Network

Suppliers

Creating value through our products and services requires an effective and responsible supply chain. We actively engage with our suppliers through transparent and objective interactions. Each year, we carry out our annual supplier evaluation survey to evaluate and approve potential suppliers for future partnerships.

Aside from the quantitative assessment of our suppliers, the supplier evaluation survey, together with one-on-one meeting, allows us to identify the key issues that concern our suppliers. These issues are namely: supplier assessment and practices on health, safety, environmental and quality issues, operational support, responsible buying and economic transparency.

■ See sections F.1 Achieving Financial Results and F.5.2 Responsible Procurement





E.6 Customer Satisfaction

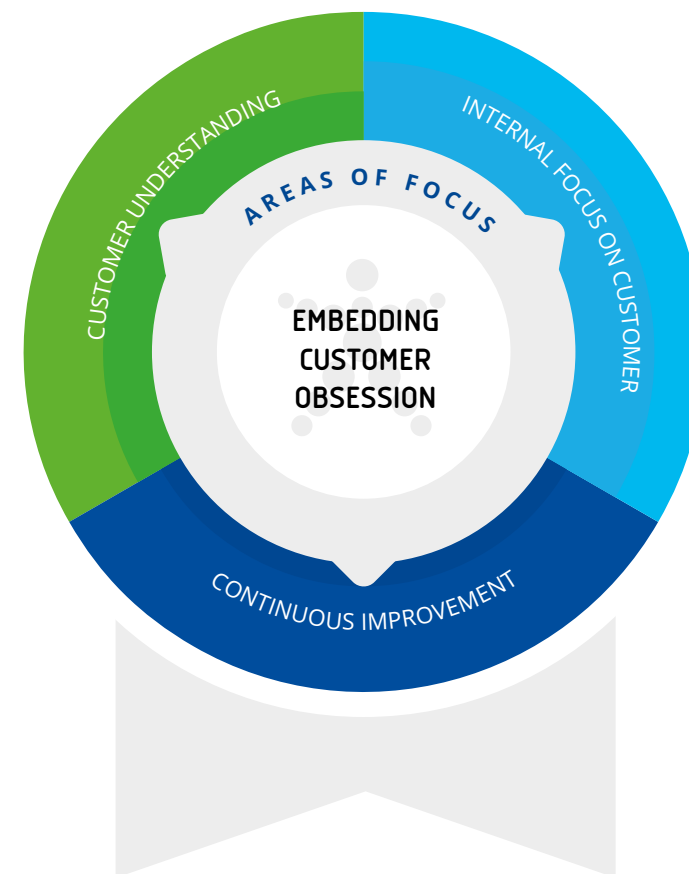
As part of OPAP's 60th anniversary, we implemented a series of initiatives highlighting our reciprocal, sincere and trustful relationship with our customers.

In our efforts to systematically manage and engage with our customers, we have designed a specific framework, which consists of three comprehensive, tangible and easy to address focus areas: customer understanding, internal focus on customer and continuous improvement.

All customer service activities are performed in accordance with OPAP's ISO9001 Quality Management System, ensuring that processes are managed in a systematic way.

We have created a central Contact Center to support all our customers, i.e. players and retail channels (e.g. agencies, PLAY Gaming Halls, Hellenic Lotteries distribution network, Tora's products, online PAME STOIXIMA). The Contact Center team is part of our Customer Experience team.

Customer Approach



Customer Understanding

Understanding our customers is the key to effectively respond to their needs and create opportunities for the future. Aiming to develop better customer insights, in 2018, our Customer Experience team mapped all our customer-facing touchpoints with the corresponding interactions and developed satisfaction-measuring mechanisms, which were carried out through the following two automated post-contact satisfaction surveys:

- Agents' satisfaction from Contact Center service.
- Players' satisfaction from Contact Center service.

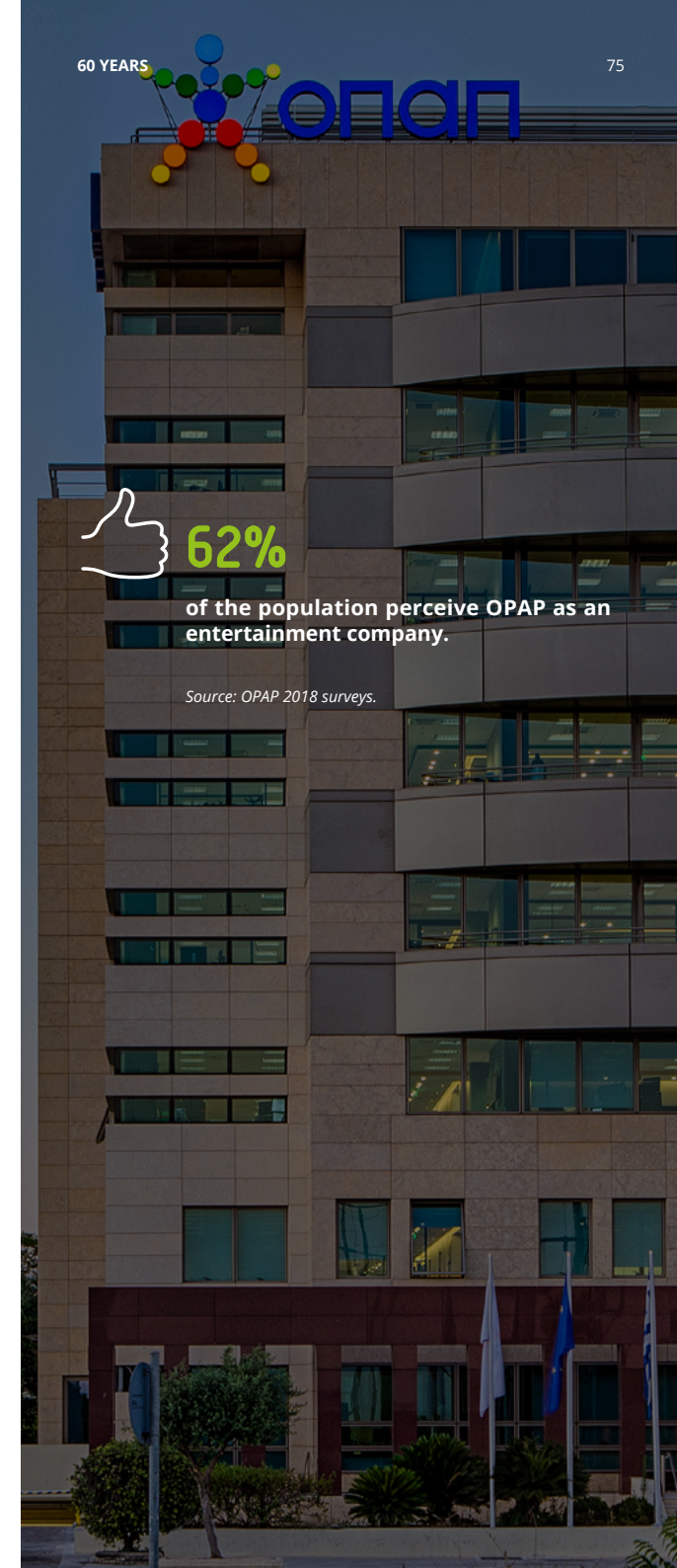
In 2018, our Research team contacted 45,000 customers through more than 75 regular and ad-hoc research studies and 240 focus groups, in order to understand the customers' profile, drivers and barriers, monitor which games they play, as well as the reasonings for their respective satisfaction or dissatisfaction with a certain service or product. This led to key insights related to the:

- Development of directional insights about our brand, as well as our new online, PLAY, Virtual Sports, Kino side bets and Self-Service Betting Terminals propositions.
- Upgrade of the Player and Agent Satisfaction studies to elaborate further on key pillars, which influence their experience, and thus enable OPAP to act accordingly by creating specific action plans.
- Design of the Customer Satisfaction studies for PLAY customers and Gaming Hall owners, so as to better understand and meet their needs.
- Creation of integrated reports of research trackers and relevant deep dives on products, retail and brands.
- Design and implementation of internal research studies that were carried out through Call Center or online, to gather immediate and actionable insights.
- Revision of insights on Strategic Customer Segments that facilitate cross-departmental prioritization of commercial and communication activities, as well as enrich our customer understanding with more variables (demographic, behavioral and attitudinal).

Our Customer Analytics team contributes to better customer understanding through the following pillars:

- **Data Infrastructure:** The team designed, maintained and enhanced datamarts used for all analytical tasks by adding flags depicting customer behavior patterns at each certain point of time. Additionally, new data infrastructure was designed for the automation of relevant and prompt customer-relationship management (CRM) offers on PLAY games and online Sportbetting customer base.
- **Behavioral Segmentation/Predictive Modeling:** Various playability prediction models were developed for optimizing customer targeting with CRM offers.
- **CRM Campaigns Optimization:** An on-going process was established for monitoring and evaluating the targeted one-to-one communications and customer rewards. Generated insights were used for further optimizations so as to maximize players' satisfaction and campaigns' return on investment.

In addition, we implemented a Campaign Management system, which enables us to automate the execution of all one-to-one targeted campaigns for Play Games and online Sportsbook players minimizing time to action, while controlling frequency of communication with our players.

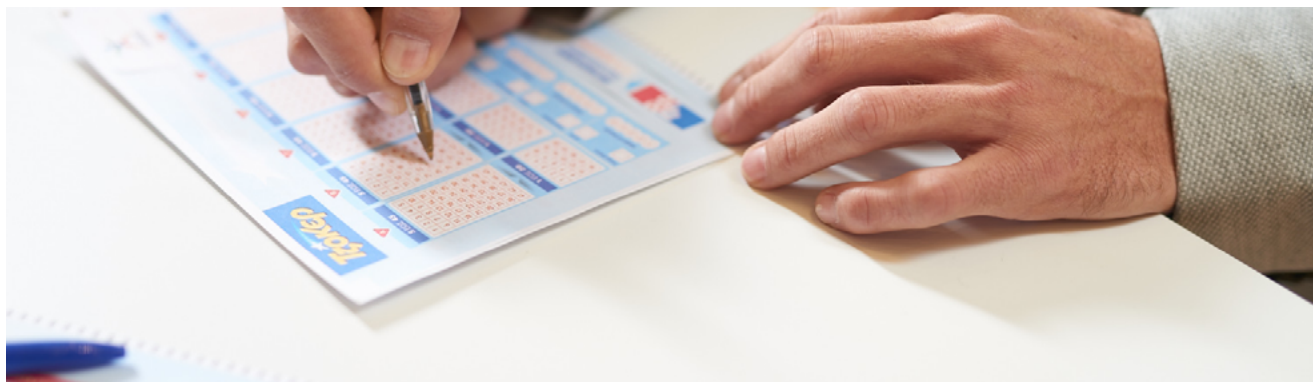


Source: OPAP 2018 surveys.

Internal Focus on Customer

We encourage all OPAP employees to understand our customers better through various initiatives, such as the following:

- **“Adopt a shop” program**, which ran at the end of 2018, where all employees were invited individually to visit an OPAP agency and gain a first-hand understanding of customers’ experience. This initiative provided the employees with better insights on how customers’ experience can be improved and fostered the establishment of a direct relationship with the agent partners.
- **“Voice of the Customer” activations**, in the context of which, we conducted “Contact Center visits” for our employees, during which they listened to live customer calls and talked with the Contact Center personnel who answer those calls. This experience allowed our employees to gain better insight of our players and agents, as well as learn the Contact Center basic principles. Additionally, our employees were invited to participate to the “Voice of the Customer Quiz”, a monthly questionnaire sent out to customers in relation to their playing habits. In 2018, an average of 250 employees completed the survey each month.
- **“Did you know” signage** in company screens and the internal social media tool (Yammer), featuring information about customers from market researches or actual data on a weekly basis.
- **“Know Your Customer” activations**, where over 300 employees participated as observers in customer focus groups to gain a better understanding on our customers’ way of thinking. They also visited our Contact Center to experience the type of service offered to agents and players.
- **“National Customer Service Week” celebration**, when various actions were organized to facilitate organization-wide information diffusion about our Contact Center and customers, as well as their needs.



Continuous Improvement

We aim to continuously improve the quality of our customer insights, in order to retain our excellent customer experience.

Therefore, in 2018, we:

- Included a Customer Satisfaction score in our key performance indicators for 2019. The score was monitored by the Customer Team every month, aiming to further enhance customers' overall satisfaction with OPAP. More than 80% of our customers stated that their experience with OPAP was as they expected it to be or exceeded their expectations.
- Designed a new customer satisfaction study for pamestoixima.gr, to cover customer needs across different touchpoints. The study will run internally in 2019 and will monitor online players' needs and further improve our online proposition.
- Included the "Adopt the Shop" attendance score in our key performance indicators for 2019. The score was monitored by the Customer Team every quarter and aims at strengthening employees' engagement with the company's retail network. The team records employees' visit rate and their post-event feedback regarding their experience with the customers, the games, the agency and the agents.
- Performed over 370,000 out bound calls to inform and support our agents on various issues, such as the digital transformation in OPAP stores, online PAME STOIXIMA, new TORA services and products launches.
- Successfully set up the online PAME STOIXIMA customer support team to offer best-in-class customer service for our digital productsportfolio.
- Introduced VLT back office process automations and managed to reduce handling time by 32%.
- Further expanded our official mobile application's (OPAPP) outreach, reaching 2 million total downloads since its launch, with notably 426,000 new downloads during 2018.
- Successfully launched the "mathetonopap.gr" initiative, which includes an interactive web-platform where the public can ask and resolve any questions regarding OPAP's activities, such as its operations, corporate responsibility, responsible gaming practices, game mechanics and payouts. A list of the most popular questions asked together with their respective answers is also included. The overarching aim of this initiative is to ensure transparency across its operations, as well as tackle misconceptions and misinformation about our games. In 2018, the platform reached 200,000 visitors within 6 months.
- Enhanced our Social Media presence by increasing our followers to 343,000; an increase of 28,000 compared to last year. A 3.7% engagement rate (which was well above the industry average of 1.5%) was achieved, reaching 3.9 million users.
- Implemented the World Cup campaign, to promote OPAP's game portfolio of PAMESTOIXIMA during the 2018 World Cup.



Monitoring our Customer Service Performance

We monitor our customer service performance aiming to continuous improvement.

As stated above, in 2018 we launched the Post Contact Satisfaction Survey for anonymous and registered customers to track their satisfaction from the service provided and collect their respective feedback. We also conducted monthly market research to measure our agents' and customers' satisfaction from our Contact Center.

Support through the Contact Center in 2018

	Agents	Players
Total contacts (inbound, outbound) (number)	1,096,200	306,000
Service Level (contacts answered in 30") (%)	71	68
Abandoned Call Rate (%)	7	8
Post Contact Satisfaction Index (%)	83	69
First Contact Resolution (%)	77	72
Customers' issues solved within 1 day (%)	74	98

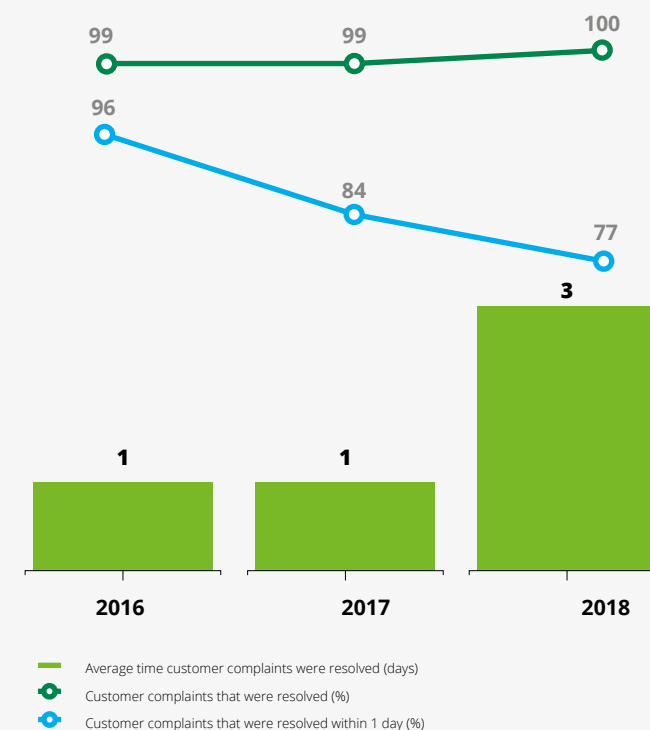
Complaints Management

In 2018, through our interactions with players and agents, we received:

- ~93,000 complaints, out of which 99.3% were resolved.
- 21,200 complaints related to advertising and marketing communications or product and service information (e.g. labelling) or product and service use (e.g. VLTs loyalty offers, VLTs malfunctions, misprinted slips, digital content, errors in terminals).
- ~16,000 complaints related to the quality of our products and services, mainly regarding misprinted game slips and VLT pay outs.
- 2,850 complaints related to the reliability of our products and services, mainly KINO and TZOKER draws and PAME STOIXIMA results.
- 102 complaints about health and safety impacts of products and services; the majority of which were related to the smoking policy within our agencies and other points of sale.

In 2018 we solved almost 100% of our customers' complaints. However, only 77% of complaints were solved within a day, raising the average complaints resolution time to 3 days. In 2018, following our technology transformation program, we received an increased number of technical requests from our agents, which required on-site visits from vendors.

Complaints Management





MATTER OF FACT

Throughout these 60 years, OPAP grew and evolved alongside Greece into an integral cell of the Greek economy and community and a point of reference for entrepreneurship and social contribution.

F.1 Achieving Financial Results

IN THIS SECTION

1. Financial Results
2. Financial Statements
3. Economic Value Generated



F.1.Achieving Financial Results

Facilitating a sustainable business

OUR OBJECTIVE

We seek to align our continuous support to society with healthy and sustainable financial results, in order to facilitate a long-term sustainable business. Therefore, we built our long-term corporate strategy in a transparent way that satisfies the needs of shareholders and the investment community, creates value for all stakeholder groups, contributes to the country's development and economic sustainability, while at the same time strengthens our presence in the gaming industry.

KEY ACHIEVEMENTS IN 2018

- € 1,547 million GGR.
- € 353.6 million EBITDA.
- € 100 million utilized in investments.

KEY TARGETS FOR 2019

- Enhance top line performance.
- Intensify cost-based optimization.
- Retain high dividend payouts.



F.1 Achieving Financial Results

F.1.1 FINANCIAL RESULTS

Achieving Healthy and Sustainable Financial Results

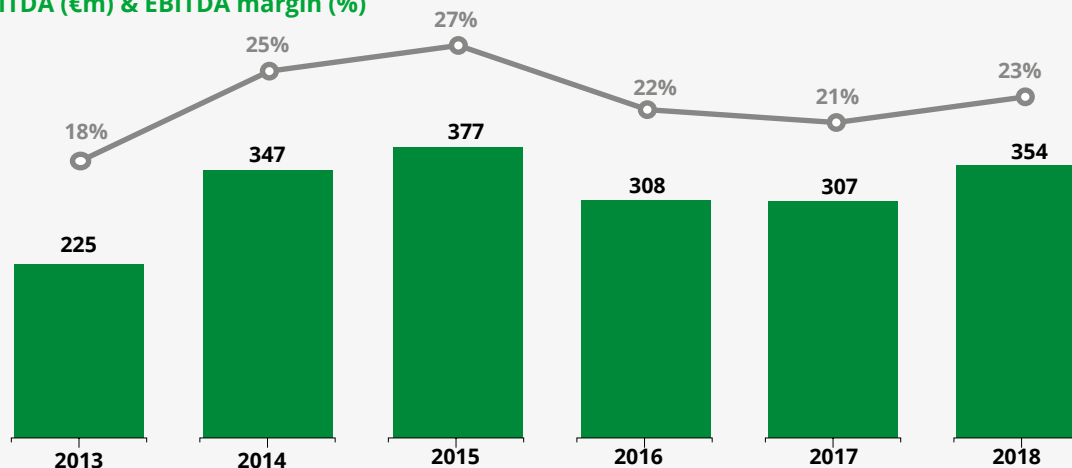
In OPAP, economic development is one of our primary targets since it contributes directly and indirectly to Greece's economic prosperity.

This section presents key consolidated financial figures for the last six years, while additional financial information can be found in our Annual Financial Reports.

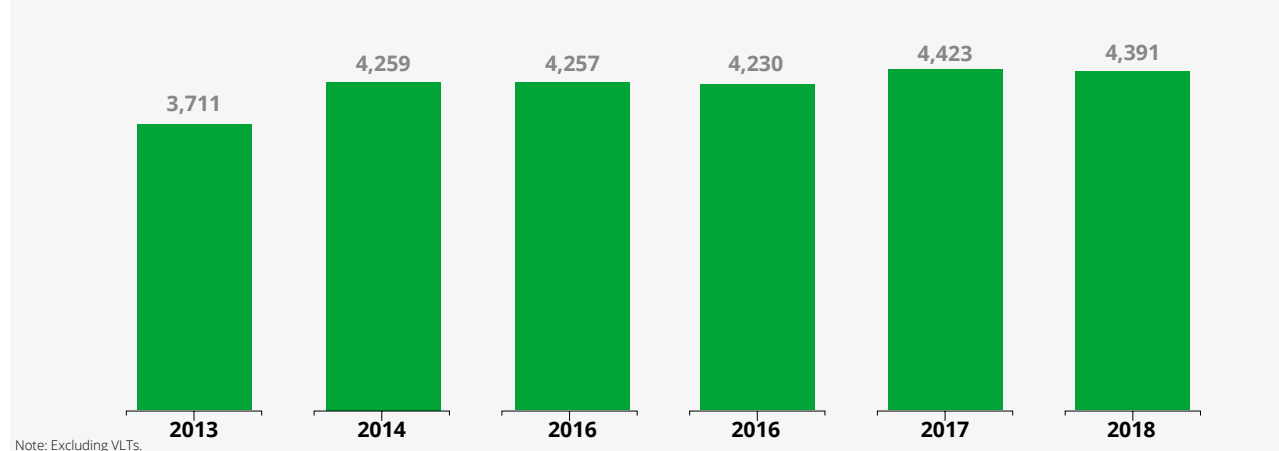
2018 was a historic year for OPAP that was accompanied by increased financial performance. In particular:

- Gross Gaming Revenue (GGR) increased by 6.3% at €1,547.0 million (FY 2017: €1,455.5m), as a result of increased VLTs contribution, positive World Cup's positive impact on betting activity and rejuvenation actions with new features in KINO.
- EBITDA increased to €353.6 million (FY 2017: €306.5 million), driven by top-line growth as well as effective cost containment actions.
- Net Profit stood at €143.3 million (FY 2017: €126.2 million) with a 13.7% year-on-year increase, or 20.8% rise adjusted for non-recurring one-off items.
- Strong financial position, with Net Debt at €459.0 million and Net Debt/EBITDA ratio of 1.3x.
- Dividend for the year stood at €0.70 per share, compared to €0.40 per share last year.

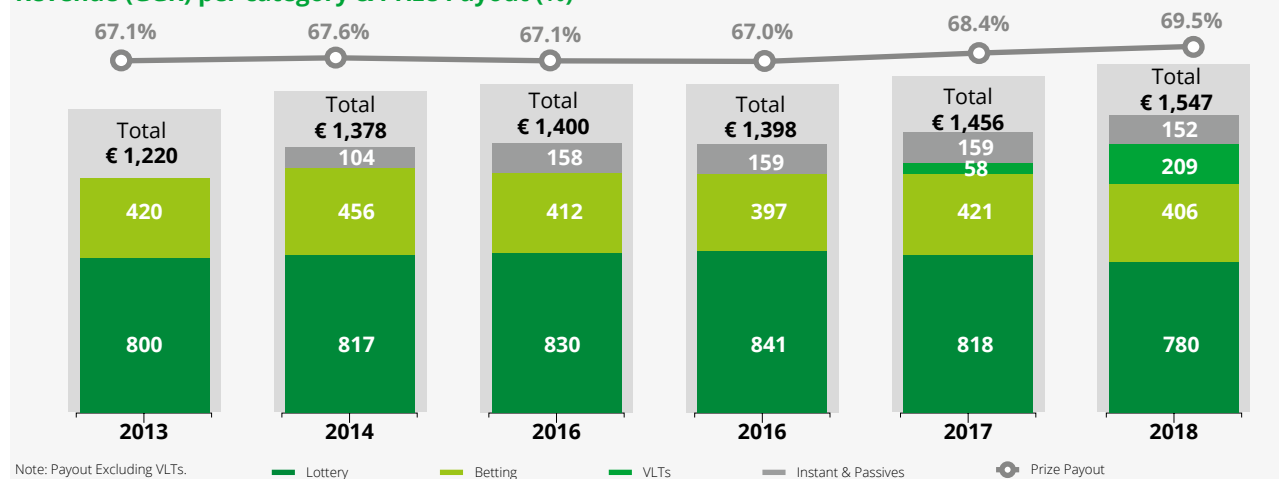
EBITDA (€m) & EBITDA margin (%)



Amounts wagered (€ m)

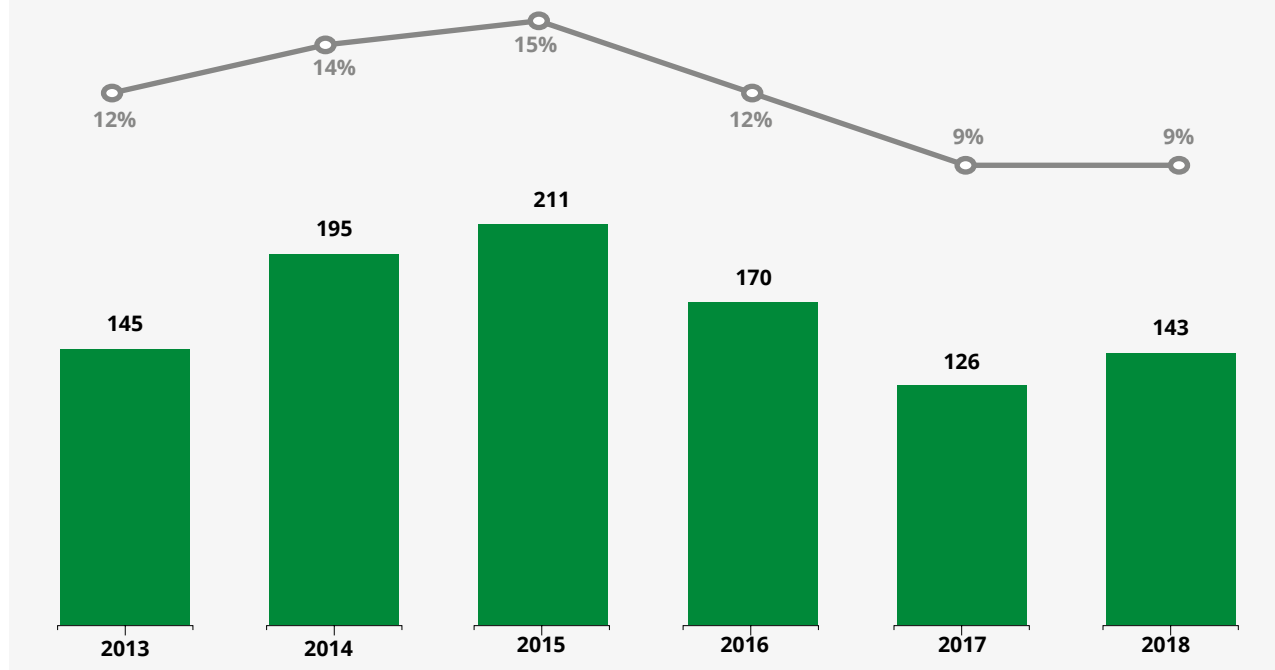


Revenue (GGR) per category & Prize Payout (%)





Net Profit (€m) & Net Profit margin (%)



Cash flows in thousand euros

(Amounts in thousand euros)	2013	2014	2015	2016	2017	2018
Net cash flows from operating activities	273,874	284,505	198,436	94,301	244,925	253,110
Net cash flows used in investing activities	-130,181	32,850	-39,067	-52,315	-123,769	-109,316
Net cash flows used in financing activities	-269,239	-261,998	-155,093	-70,158	-148,578	198,442
Net increase/decrease in cash and cash equivalents	-125,546	55,357	4,276	-28,172	-27,421	54,648

Transparently Disclosing Significant Transactions

As part of being transparent in our financial reporting process, we disclose significant transactions within OPAP Group of companies and other related parties (as defined by IAS 24). The amounts of expenses and income undertaken in 2018, and the balances of payables and receivables as at 31.12.2018 for the Group and the company, arising from transactions between related parties are presented in the following tables.

Company's transactions with related parties in thousand euros (eliminated for consolidation purposes)

Company	Expenses	Income	Assets' Purchase	Payables	Receivables
OPAP SERVICES S.A.	5,174	112	-	408	14,677
OPAP SPORTS LTD	-	836	-	-	-
OPAP CYPRUS LTD	157	28,487	-	20,549	7,107
OPAP INVESTMENT LTD	208	-	-	6,249	-
HELLENIC LOTTERIES S.A.	-	6,238	-	11	3,487
HORSE RACES S.A.	3	481	-	-	688
TORA DIRECT S.A.	297	233	-	87	3,542
TORA WALLET S.A.	66	76	-	79	65
NEUROSOFT S.A.	6,741	-	1,992	1,653	-

Group's companies transactions with related companies (not eliminated for consolidation purposes)

Company	Expenses	Payables
(Amounts in thousand euros)		
Related companies	3,620	380



Transaction and balances with Board of Directors members and management personnel

(Amounts in thousand euros)		Group	Company
Category	Description	01.01-31.12.2018	01.01-31.12.2018
Management personnel	Salaries	4,222	4,222
	Other compensations	135	135
	Cost of social insurance	239	239
Total		4,596	4,596

(Amounts in thousand euros)		Group	Company
Category	Description	01.01-31.12.2018	01.01-31.12.2018
Board of directors	Salaries	893	371
	Cost of social insurance	107	66
Total		1,000	436

(Amounts in thousand euros)		Group	Company
Liabilities from BoD' compensation & remuneration		31.12.2018	31.12.2018
BoD and key management personnel		278	186
Total		278	186

It must be noted that:

- From the above, the transactions and balances with the subsidiaries have been eliminated from the consolidated Financial Statements of Group.
- No financial assistance was received from the Greek State within 2018.

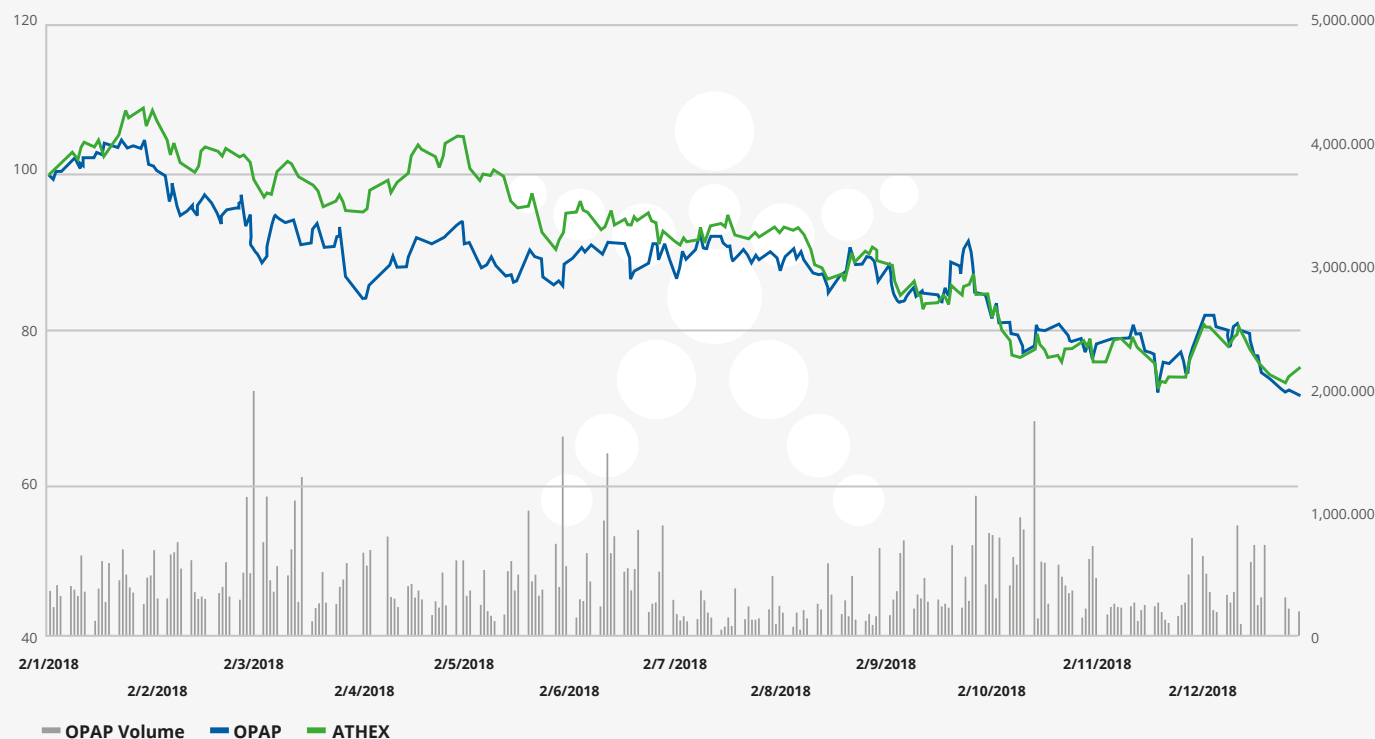


Providing Equal and Transparent Updates to all the Investment Community

We strive to be transparent in our communication with our shareholders. The Investor Relations Team is responsible to manage the interactions and communications with shareholders, institutional investors and financial analysts. The investor relations program includes:

- Regular one-on-one and group meetings with institutional investors
- Presentations of annual and interim financial statements
- Participations in international investor events and roadshows related to either Gaming, Emerging Markets and/ or Greece - South Eastern Europe
- Investor conferences

Share price and volume





F.1.2 FINANCIAL STATEMENTS

Statement of Financial Position

As of 31 December 2018 and for the year then ended (Amounts in thousands of euro)	GROUP		COMPANY	
	31.12.2018	31.12.2017 Restated*	31.12.2018	31.12.2017
ASSETS				
Non - current assets				
Intangible assets	1,122,920	1,169,776	972,679	1,001,442
Property, plant & equipment	111,467	109,298	88,421	86,994
Investment property	903	922	903	922
Goodwill	34,275	51,775	-	-
Investments in subsidiaries	-	-	270,725	281,945
Investments in associates	50,089	-	-	-
Long - term receivables	2	2	2	2
Other non - current assets	47,151	22,553	47,464	40,225
Deferred tax asset	1,897	3,495	-	-
Total non - current assets	1,368,704	1,357,822	1,380,194	1,411,530
Current assets				
Cash and cash equivalents	191,454	246,102	101,563	94,270
Inventories	10,662	7,920	1,053	1,927
Trade receivables	137,417	127,829	43,512	54,360
Other current assets	41,686	58,532	17,898	29,896
Total current assets	381,220	440,383	164,026	180,454
Total Assets	1,749,923	1,798,205	1,544,220	1,591,984

As of 31 December 2018 and for the year then ended (Amounts in thousands of euro)	GROUP		COMPANY	
	31.12.2018	31.12.2017 Restated*	31.12.2018	31.12.2017
EQUITY & LIABILITIES				
Equity				
Share capital	95,700	95,700	95,700	95,700
Reserves	33,156	33,034	31,900	31,900
Treasury shares	(14,497)	(9,039)	(14,497)	(9,039)
Retained earnings	608,395	595,016	604,126	598,462
Equity attributable to owners of the Company	722,754	714,711	717,229	717,023
Non-controlling interests	36,782	44,752	-	-
Total equity	759,536	759,462	717,229	717,023
Non-current liabilities				
Loans	650,260	513,098	601,351	467,342
Deferred tax liability	-	-	12,701	9,252
Employee benefit plans	4,807	3,084	4,409	2,735
Provisions	28,273	31,187	26,893	29,773
Other non-current liabilities	12,021	9,567	9,300	7,804
Total non-current liabilities	695,361	556,936	654,654	516,907
Current liabilities				
Loans	191	169,171	20,011	169,171
Trade payables	176,685	173,860	64,394	77,005
Tax liabilities	73,136	89,771	60,752	78,409
Other current liabilities	45,015	49,004	27,181	33,470
Total current liabilities	295,026	481,807	172,337	358,054
Total liabilities	990,387	1,038,743	826,991	874,961
TOTAL Equity & Liabilities	1,749,923	1,798,205	1,544,220	1,591,984

* The figures of fiscal year 2017 are the ones that resulted after the reform of the Financial Statements according to IFRS 3 regarding the finalization of the amount of goodwill arising from the acquisition of the subsidiary NEUROSOFT S.A..

Income Statement

As of 31 December 2018 and for the year then ended (Amounts in thousands of euro)	GROUP		COMPANY	
	31.12.2018	31.12.2017 Restated*	31.12.2018	31.12.2017
Amounts wagered	4,390,861	4,422,902	3,644,812	3,684,005
Income Statement is as follows:				
Revenue (GGR)	1,547,015	1,455,514	1,294,097	1,201,589
GGR contribution and other levies and duties	(507,080)	(482,578)	(442,800)	(416,874)
Net gaming revenue (NGR)	1,039,935	972,936	851,297	784,715
Agents' commission	(381,090)	(369,924)	(312,796)	(302,659)
Other NGR related commission	(52,954)	(38,270)	(36,403)	(21,740)
Other operating income	128,788	119,636	41,768	38,012
Other operating cost	(91,940)	(91,731)	-	-
	642,738	592,647	543,866	498,328
Operating expenses	(289,138)	(286,192)	(254,924)	(238,358)
Payroll expenses	(76,052)	(63,781)	(63,471)	(55,294)
Marketing expenses	(65,839)	(67,431)	(48,352)	(47,485)
Other operating expenses	(147,247)	(154,980)	(143,101)	(135,579)
Profit before interest, tax, depreciation, amortization and impairment (EBITDA)	353,600	306,455	288,942	259,971
Depreciation, amortization and impairment	(114,308)	(92,008)	(71,149)	(66,631)
Results from operating activities	239,292	214,447	217,793	193,339
Finance income	2,887	2,934	1,091	1,412
Finance costs	(26,368)	(23,998)	(23,711)	(20,656)
Other finance income / (cost)	89	(267)	4,836	6,592
Profit before tax	215,900	193,115	200,008	180,687
Income tax expense	(70,599)	(61,578)	(64,818)	(55,125)
Profit for the period	145,301	131,538	135,190	125,563
Profit attributable to:				
Owners of the Company	143,312	126,151	135,190	125,563
Non-controlling interests	1,988	5,387	-	-
Profit after tax	145,301	131,538	135,190	125,563
Basic and diluted earnings (after tax) per share in €	0.4511	0.3969	0.4256	0.3950

* The figures of fiscal year 2017 are the ones that resulted after the reform of the Financial Statements according to IFRS 3 regarding the finalization of the amount of goodwill arising from the acquisition of the subsidiary NEUROSOFT S.A..

Statement of Profit or Loss and other Comprehensive Income

As of 31 December 2018 and for the year then ended (Amounts in thousands of euro)	GROUP		COMPANY	
	31.12.2018	31.12.2017 Restated*	31.12.2018	31.12.2017
Profit for the period	145,301	131,538	135,190	125,563
Other comprehensive income - items that will not be reclassified to profit or loss				
Actuarial gains/(losses)	(101)	255	(127)	29
Related tax	25	(74)	32	(8)
Total items that will not be reclassified to profit or loss	(77)	181	(96)	20
Other comprehensive income - items that are or may be reclassified subsequently to profit or loss				
Loss from valuation of hedging derivatives	(1,057)	(214)	(1,057)	(214)
Attributable income tax	264	62	264	62
Total items that may be reclassified to profit or loss	(793)	(152)	(793)	(152)
Other comprehensive income net of tax	(870)	29	(889)	(131)
Total comprehensive income net of tax	144,431	131,567	134,301	125,431
Total comprehensive income attributable to:				
Owners of the Company	142,439	126,129	134,301	125,431
Non-controlling interests	1,992	5,438	-	-
Total comprehensive income net of tax	144,431	131,567	134,301	125,431

* The figures of fiscal year 2017 are the ones that resulted after the reform of the Financial Statements according to IFRS 3 regarding the finalization of the amount of goodwill arising from the acquisition of the subsidiary NEUROSFT S.A..

Statement of Changes in Equity

A) Consolidated Statement of Changes in Equity

As of 31 December 2018 and for the year then ended (Amounts in thousands of euro).

GROUP	Share capital	Reserves	Treasury shares	Retained earnings Restated*	Total	Non-controlling interests Restated*	Total equity
Balance as of 1 January 2017	95,700	32,417	(7,454)	914,614	1,035,277	36,954	1,072,231
Profit for the year	-	-	-	126,151	126,151	5,387	131,538
Other comprehensive loss	-	-	-	(22)	(22)	51	29
Total comprehensive income	-	-	-	126,129	126,129	5,438	131,567
Transactions with owners of the Company							
Acquisition of treasury shares	-	-	(1,585)	-	(1,585)	-	(1,585)
Share capital increase expenses of subsidiaries	-	-	-	(165)	(165)	-	(165)
Reserves of subsidiaries	-	617	-	(617)	-	-	-
Dividends paid	-	-	-	(444,944)	(444,944)	(1,698)	(446,643)
Total transactions with owners of the Company	-	617	(1,585)	(445,727)	(446,695)	(1,698)	(448,393)
Changes in ownership interests							
Acquisition of subsidiaries with non-controlling interests	-	-	-	-	-	4,057	4,057
Total changes in ownership interests	-	-	-	-	-	4,057	4,057
Balance as of 31 December 2017 Restated*	95,700	33,034	(9,039)	595,016	714,711	44,752	759,463
Balance as of 1 January 2018	95,700	33,034	(9,039)	595,016	714,711	44,752	759,463
Profit for the year	-	-	-	143,312	143,312	1,988	145,301
Other comprehensive income/(loss)	-	-	-	(873)	(873)	4	(870)
Total comprehensive income	-	-	-	142,439	142,439	1,992	144,431
Transactions with owners of the Company							
Acquisition of treasury shares (Note 12.15)	-	-	(5,458)	-	(5,458)	-	(5,458)
Share capital increase expenses of subsidiaries	-	-	-	(301)	(301)	(69)	(370)
Share capital decrease of subsidiary	-	-	-	-	-	(6,261)	(6,261)
Other movements	-	-	-	(1,539)	(1,539)	-	(1,539)
Reserves of subsidiaries	-	122	-	(122)	-	-	-
Dividends paid	-	-	-	(127,098)	(127,098)	(3,632)	(130,730)
Total transactions with owners of the Company	-	122	(5,458)	(129,060)	(134,396)	(9,961)	(144,357)
Balance as of 31 December 2018	95,700	33,156	(14,497)	608,395	722,754	36,782	759,536

* The figures of fiscal year 2017 are the ones that resulted after the reform of the Financial Statements according to IFRS 3 regarding the finalization of the amount of goodwill arising from the acquisition of the subsidiary NEUROSOFT S.A..

B) Separate Statement of Changes in Equity

As of 31 December 2018 and for the year then ended (Amounts in thousands of euro).

GROUP	Share capital	Reserves	Treasury shares	Retained earnings	Total equity
Balance as of 1 January 2017	95,700	31,900	(7,454)	917,975	1,038,121
Profit for the year	-	-	-	125,563	125,563
Other comprehensive loss	-	-	-	(131)	(131)
Total comprehensive income	-	-	-	125,431	125,431
Acquisition of treasury shares	-	-	(1,585)	-	(1,585)
Dividends paid	-	-	-	(444,944)	(444,944)
Balance as of 31 December 2017	95,700	31,900	(9,039)	598,462	717,023
Balance as of 1 January 2018	95,700	31,900	(9,039)	598,462	717,023
Profit for the year	-	-	-	135,190	135,190
Other comprehensive loss	-	-	-	(889)	(889)
Total comprehensive income	-	-	-	134,301	134,301
Acquisition of treasury shares	-	-	(5,458)	-	(5,458)
Other movements	-	-	-	(1,539)	(1,539)
Dividends paid	-	-	-	(127,098)	(127,098)
Balance as of 31 December 2018	95,700	31,900	(14,497)	604,126	717,229



Cash Flow Statement

As of 31 December 2018 and for the year then ended (Amounts in thousands of euro)	GROUP		COMPANY	
	31.12.2018	31.12.2017 Restated*	31.12.2018	31.12.2017
OPERATING ACTIVITIES				
Profit before tax	215,900	193,115	200,008	180,687
Adjustments for:				
Depreciation & Amortization	96,767	89,266	71,149	66,631
Net finance costs	23,449	21,083	17,772	12,671
Employee benefit plans	1,573	1,516	1,501	1,413
Provisions for bad debts	2,990	1,554	1,751	1,162
Other provisions	(1,823)	(1,884)	(1,789)	(1,923)
Impairment losses on intangible assets & goodwill	17,541	2,742	-	-
Exchange differences	32	(19)	13	(19)
Impairment of investment in subsidiary	-	-	27,202	13,659
Share of (profit)/loss from associates	(89)	267	-	-
Profit from investing activities	(34)	(47)	(34)	(28)
Other non-cash items	-	-	2,755	2,755
Total	356,307	307,593	320,327	277,008
Changes in Working capital				
(Increase) / decrease in inventories	(2,742)	5,155	875	423
(Increase) / decrease in receivables	(14,636)	(63,274)	7,766	(43,714)
Increase / (decrease) in payables (except banks)	2,658	14,994	(13,780)	20,857
Increase / (decrease) in taxes payable	(10,248)	33,861	(11,579)	34,650
Total	331,338	298,330	303,608	289,225
Interest paid	(26,555)	(21,992)	(23,813)	(18,440)
Income taxes paid	(51,674)	(31,412)	(43,724)	(25,665)
Net cash from operating activities	253,110	244,925	236,071	245,120

Cash Flow Statement

As of 31 December 2018 and for the year then ended (Amounts in thousands of euro)	GROUP		COMPANY	
	31.12.2018	31.12.2017 Restated*	31.12.2018	31.12.2017
INVESTING ACTIVITIES				
Proceeds from sale of tangible & intangible assets	55	125	53	45
Acquisition of subsidiary/associate, net of cash acquired	(48,000)	(31,583)	-	-
Loan repayments from third parties	5,106	1,564	3,382	-
Loan repayments from subsidiaries	-	-	700	-
Share capital increase of subsidiaries	-	-	(15,982)	(15,000)
Loans granted to third parties	(16,290)	-	-	-
Loans granted to Group companies	-	-	(750)	(3,600)
Purchase of intangible assets	(30,154)	(38,667)	(28,263)	(15,560)
Purchase of property, plant and equipment & investment property	(21,968)	(57,614)	(15,551)	(53,219)
Dividends received	-	-	4,836	6,592
Interest received	1,935	2,406	740	1,151
Net cash used in investing activities	(109,316)	(123,769)	(50,835)	(79,590)
FINANCING ACTIVITIES				
Proceeds from loans & borrowings	260,180	350,000	270,000	350,000
Payments of loans & borrowings	(290,752)	(46,041)	(290,661)	(36,018)
Transaction costs related to loans & borrowings	(1,750)	(4,726)	(1,425)	(4,726)
Acquisition of treasury shares	(5,458)	(1,585)	(5,458)	(1,585)
Share capital increase expenses of subsidiaries	(370)	(165)	-	-
Share capital return of subsidiaries	(6,261)	-	-	-
Dividends paid	(130,731)	(446,060)	(127,099)	(444,362)
Tax on prior year dividends	(23,300)	-	(23,300)	-
Net cash used in financing activities	(198,442)	(148,578)	(177,943)	(136,691)
Net increase / (decrease) in cash and cash equivalents	(54,648)	(27,421)	7,293	28,838
Cash and cash equivalents at the beginning of the year	246,102	273,523	94,270	65,433
Cash and cash equivalents at the end of the year	191,454	246,102	101,563	94,270

* The figures of fiscal year 2017 are the ones that resulted after the reform of the Financial Statements according to IFRS 3 regarding the finalization of the amount of goodwill arising from the acquisition of the subsidiary NEUROSOFT S.A..

Operating Segments

As of 31 December 2018 and for the year then ended.

GROUP 01.01-31.12.2018	LOTTERIES	SPORTS BETTING	INSTANT & PASSIVES	VLTS	TELECOMMUNICATION & EMONEY SERVICES	OTHER	TOTAL
Revenue (GGR)	779,944	406,244	152,168	208,659	-	-	1,547,015
GGR contribution and other levies and duties	(259,123)	(139,710)	(45,651)	(62,598)	-	-	(507,080)
Net gaming revenue (NGR)	520,821	266,535	106,518	146,061	-	-	1,039,935
Agents' commission	(190,194)	(98,778)	(40,597)	(50,135)	-	(1,387)	(381,090)
Other NGR related commission	(308)	(8,520)	(14,413)	(29,713)	-	-	(52,954)
Other operating income	-	1,151	75	-	89,721	37,840	128,788
Other operating cost	-	-	-	-	(81,923)	(10,017)	(91,940)
	330,320	160,388	51,583	66,213	7,798	26,436	642,738
Operating expenses	(129,883)	(76,543)	(17,009)	(34,738)	(8,879)	(22,086)	(289,138)
Depreciation, amortization and impairment	(24,177)	(15,791)	(17,444)	(33,744)	(260)	(22,893)	(114,308)

GROUP 01.01-31.12.2018	LOTTERIES	SPORTS BETTING	INSTANT & PASSIVES	VLTS	TELECOMMUNICATION & EMONEY SERVICES	OTHER	TOTAL
Revenue (GGR)	817,989	421,058	158,916	57,550	-	-	1,455,514
GGR contribution and other levies and duties	(272,085)	(145,395)	(47,833)	(17,265)	-	-	(482,578)
Net gaming revenue (NGR)	545,904	275,663	111,083	40,285	-	-	972,936
Agents' commission	(207,067)	(106,277)	(41,404)	(13,793)	-	(1,382)	(369,924)
Other NGR related commission	(1,107)	(14,210)	(14,894)	(8,059)	-	-	(38,270)
Other operating income	-	699	36	-	82,905	35,996	119,636
Other operating cost	-	-	-	-	(75,757)	(15,974)	(91,731)
	337,730	155,876	54,820	18,433	7,148	18,640	592,647
Operating expenses	(146,720)	(87,501)	(19,577)	(10,381)	(7,850)	(14,163)	(286,192)
Depreciation and amortization	(21,393)	(29,139)	(3,900)	(33,744)	(180)	(3,652)	(92,008)
Results from operating activities	169,617	39,235	31,343	(25,691)	(882)	825	214,447

Geographical Segments

Group's operations are in Greece and Cyprus. Greece is the country of incorporation of the Company and of the subsidiaries OPAP SERVICES S.A., HELLENIC LOTTERIES S.A., HORSE RACES S.A., TORA DIRECT S.A., TORA WALLET S.A. and NEUROSOFT S.A.

For the period that ended on 31 December 2018	GREECE	CYPRUS	INTERCOMPANY TRANSACTIONS	TOTAL
Amounts wagered	4,111,785	279,076	-	4,390,861
Revenue (GGR) and Other operating income	1,628,058	91,877	(44,132)	1,675,803
Net gaming revenue (NGR)	964,356	75,579	-	1,039,935
Segment Assets	1,892,475	316,450	(459,002)	1,749,923
Segment Liabilities	1,023,858	35,033	(68,503)	990,387

For the period that ended on 31 December 2017	GREECE	CYPRUS	INTERCOMPANY TRANSACTIONS	TOTAL
Amounts wagered	4,170,505	252,397	-	4,422,902
Revenue (GGR) and Other operating income	1,529,206	84,464	(38,520)	1,575,150
Net gaming revenue (NGR)	903,165	69,771	-	972,936
Segment Assets	1,944,875	301,295	(447,965)	1,798,205
Segment Liabilities	1,053,848	29,601	(44,706)	1,038,743

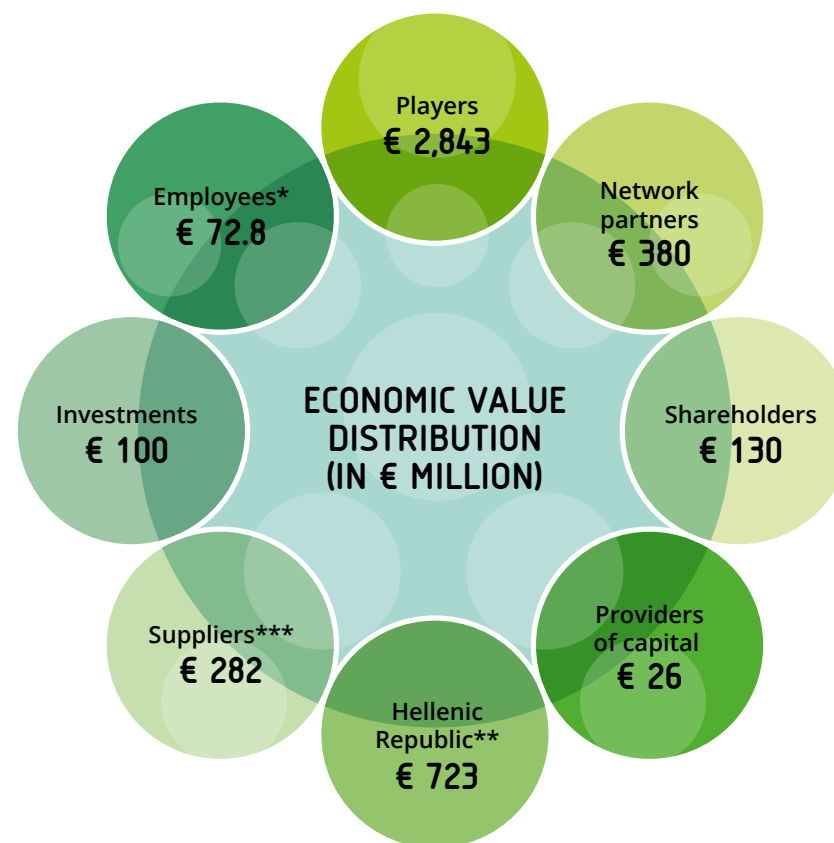
F.1.3 ECONOMIC VALUE GENERATED

Distributing Significant 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. We are committed to utilizing the positive value generated by our business to benefit different stakeholders. Therefore, our turnover ensures that we return significant financial resources back to society, towards our players (through pay-out to lottery and betting winners), our network (through a commission-based agents' agreement), our shareholders (through dividends), our suppliers (through purchases), our employees (through wages, benefits and insurance payments), providers of capital (through interest paid for loans), the Hellenic Republic (through its participation in GGR, corporate taxes and other taxes and duties) and investments. Within 2018, OPAP Group:

- Paid out over €2,843 million to players.
- Distributed over €380 million to its network.
- Distributed over €130 million to its shareholders.
- Paid over €282 million to suppliers (excluding investments)
- Distributed over €72.8 million for employees.
- Paid over €26 million to providers of capital.
- Paid over €723 million to the Hellenic Republic, out of which €490 million were GGR contribution and €51 million were corporate taxes.
- Utilized over €100 million in investments.

Economic Value Distribution (in €M)



*Amount refers to wages, benefits and insurance payments.

**Amount refers to the Hellenic Republic's participation in GGR, corporate taxes and other taxes and duties.

***excl. investments.

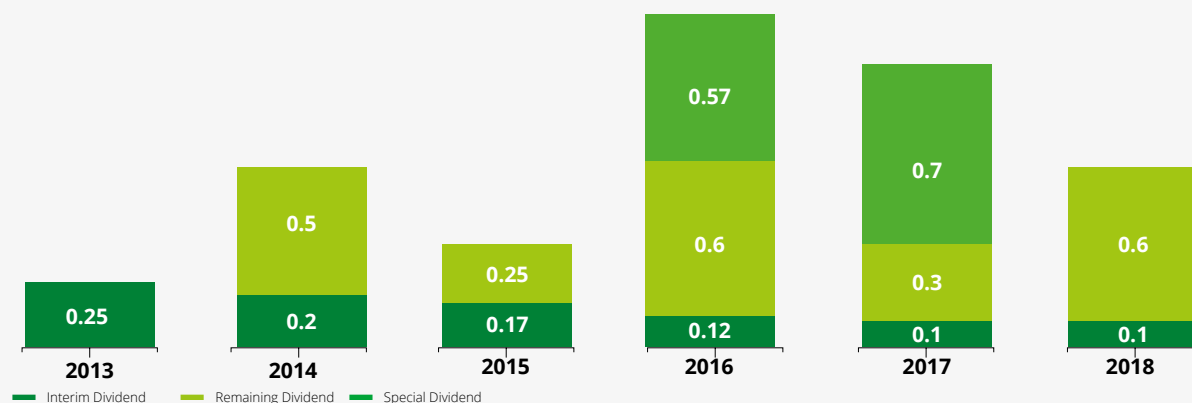
An important parameter that illustrates our commitment to create economic value for our stakeholders as well as our transparent practices, is our obligation to return undistributed winnings of players (amounts from winning tickets that were never collected), along with the rounding up of winnings in every winning category, back to the Hellenic Republic.

Specifically, the undistributed winnings for 2018 (as registered in the financial statements on 31/12/2017) were €18.3 million, compared to €14.0 million in 2017.

Our dividend policy remained aligned with our principle to distribute the bulk of our Free Cash Flow excluding any investments. It must be noted that:

- The total remaining gross dividend per share (DPS) paid for the fiscal year 2017 was €0.30, while the interim gross dividend paid per share for the fiscal year 2018 was €0.10.
- Earnings per share (EPS) in 2018 were approximately €0.45, compared to approximately €0.40 in 2017.

Dividend distribution



	2013	2014	2015	2016	2017	2018
Dividend per share (€)	0.25	0.70	0.40	1.29	1.10	0.70
Dividend payout (%)	59.6	112.4	60.5	241.4	277.0	155.2



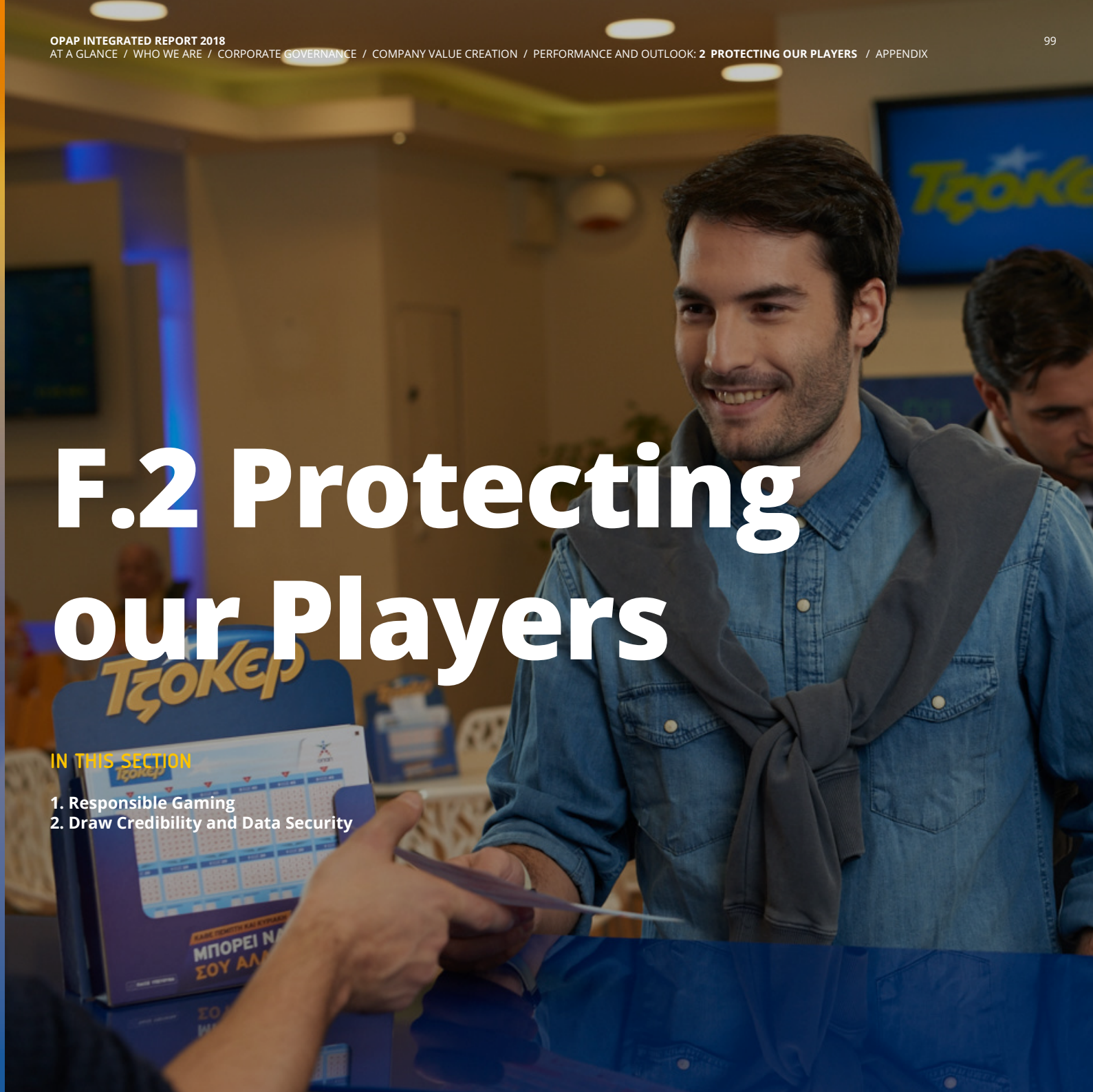
MATTER OF FACT

OPAP's commitment to Responsible Gaming has always been at the core of its business philosophy. Today this commitment stands at the highest ever level.

F.2 Protecting our Players

IN THIS SECTION

1. Responsible Gaming
2. Draw Credibility and Data Security



F.2 Protecting our Players

Establishing a safe gaming experience

OUR OBJECTIVE

We understand that the 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.

KEY ACHIEVEMENTS IN 2018

- Obtained 4th Level WLA certification regarding Responsible Gaming for OPAP.
- Refreshed the e-learning training courses on Responsible Gaming for employees and agents.
- Completed all necessary actions regarding enforcement of the new General Data Protection Regulation (GDPR) rules.

KEY TARGETS FOR 2019

- Strengthen the communication strategy of Responsible Gaming to ensure players understand how to play responsibly.
- Empower agents to detect and handle problematic playing behavior.
- Maintain high Responsible Gaming standards in everything we do.

OUR PROGRESS AGAINST 2018 TARGETS



100%
Achieved

F.2 Protecting our Players

F.2.1 RESPONSIBLE GAMING

Our Strategic Approach

Our Responsible Gaming Framework is based on the World Lottery Association's (WLA) framework and consists of activities that aim to ensure responsible and sustainable growth.

Within this Framework, we have developed Responsible Gaming Policies, as follows:

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

These policies define all the necessary measures companies are advised to take in order to minimize the potential negative impact from participation in games of chance. The policies address three main target groups:

- Employees
- Agents and Play stores venue managers / Points of Sale and their employees
- Players

Expanding our responsibility practices into our sphere of influence, we require 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 or forced and coercive labor in any of their facilities.

OPAP's Responsible Gaming Framework



International certification for Responsible Gaming

In 2018, two international associations rewarded us (OPAP S.A. and Hellenic Lotteries S.A.) with the highest distinctions globally for our commitment in protecting consumers and ensuring a safe environment for our players. In particular, WLA awarded us with the WLA Responsible Gaming Certificate Level 4, which is the highest level of Responsible Gaming Certifications globally, moving forward from the Level 3 certification we had been awarded in 2015.

In addition, the European State Lotteries and Toto Association/ European Lotteries (EL) awarded us with the Statement of Alignment with the EL Responsible Gaming Standards for our true dedication to consistently build Responsible Gaming principles in our strategy and operation.

All certifications are valid until 2021. These certifications serve as a testament to the effectiveness of our Responsible Gaming programs and the benefit they bring to all our stakeholders towards safeguarding the joy of the game.

Educating our Employees on Responsible Gaming Practices

We inform, educate and engage with our employees about Responsible Gaming, in order to ensure their compliance with the respective principles and rules, defined by our policies and practices. All our employees have been informed about our Responsible Gaming strategy through internal awareness campaigns, where basic rules of Responsible Gaming as well as our respective achievements were addressed. Indicatively, within 2018, we:

- Briefed and trained all our employees on responsible gaming, covering topics such as the protection of minors and excessive playing. In 2018, we revised the content of the induction training from the previous year's version, to ensure all information is fully up to date. Informed our new employees about our Responsible Gaming Policy, with material that is also available on the company's intranet site. In 2018 we redesigned the Responsible Gaming section of our company's intranet and updated the content to make it more attractive and useful to employees.
- Offered a mandatory online training course on OPAP's Responsible Gaming strategy, priorities and related regulatory framework to all employees. In 2018, the content of the online training was updated.
- Conducted specialized training sessions in Responsible Gaming to frontline employees, in collaboration with KETHEA.
- Offered our employees and senior management the opportunity to learn more about addiction by hosting two former gambling addicts who shared their personal testimonies with us.





Ensuring our Network's Commitment to Responsible Gaming

Our contractual agreements with all our sales agents include a number of clauses, which refer to their responsible operation. We operate two dedicated sections on Responsible Gaming and Corporate Responsibility in the opapnet, opapnet|play and opapnet|laheia portals, available to our network. In addition, we have distributed the Hellenic Lotteries Points of Sale Network Policy on Responsible Gaming to all distributors of instant win games and passive lotteries tickets.

Our agents are obliged 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 with the principles and rules of responsible operation constitutes a reason to impose penalties (ranging from warning to termination of the agency's agreement).

We inform our agents and Play stores operators about the requirements of responsible operation and we make sure that they comply with OPAP's principles and rules.

Training on Responsible Gaming

In 2018, 100% and 95% of OPAP's sales agents were briefed and trained on Responsible Gaming respectively. All new agents were trained on Responsible Gaming. We:

- Trained 629 agents and agents' employees (including all new agents and their employees), 1,400 Play stores operators and their employees and 65 Points of Sale (wholesalers and distributors to cascade training to Point of Sale such as kiosks, mini markets and supermarkets) on responsible operation.
- Updated the e-learning training course on Responsible Gaming for our agents, with over 1,400 agents and agents' employees trained.
- Developed a dedicated Responsible Gaming module for agent's VLTs training, with over 1,750 agents, store operators and employees in agencies with installed VLTs trained.
- Trained 313 wholesalers, distributors and street vendors on Responsible Gaming rules and principles.
- Communicated Responsible Gaming messages to all agents, wholesalers and street vendors.
- Uploaded announcements about Responsible Gaming on portals, the dedicated online communication platforms (opapnet, opapnet|play and opapnet|laheia) for agents and staff of OPAP stores, Play stores and Hellenic Lotteries partners and points of sale respectively.

Agents, Play stores venue managers and their employees are trained to identify a player's problematic behavior, as well as provide advice to mitigate the consequences of excessive playing and suggest relevant treatment referral providers.

Monitoring closely our network's performance regarding Responsible Gaming practices

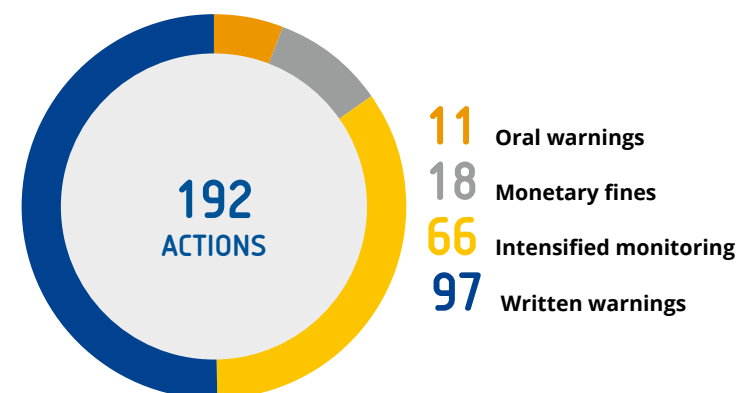
Indicating our commitment to ensure proper compliance with the Responsible Gaming rules and principles, we monitor our agencies' and Play stores' compliance with the basic rules of Responsible Gaming. Compliance with the Responsible Gaming rules is assessed through the FOT's Mystery Shopping visits ([see section E.3.4 Addressing Illegal Gaming](#)), where the following aspects, among others, are inspected:

- Entry of minors in agencies and under 21-years of age in Play stores.
- Minors' participation in games of chance (under 21 years of age for Play games).
- Presence of Responsible Gaming mandatory materials.

In case agents are identified as being non-compliant with their obligations in the above areas, OPAP reserves the right to terminate their agreement.

During 2018, we performed 3,771 unique shop visits to our network (approximately 90% of our network), where 122 cases of high severity violations on behalf of our agents regarding their responsible operation were reported, which led to a total of 192 actions from OPAP, including monetary fines.

Remedial actions taken for high severity responsible gaming violations*



* High severity Responsible Gaming violations refer to underage / self-excluded persons' participation in games



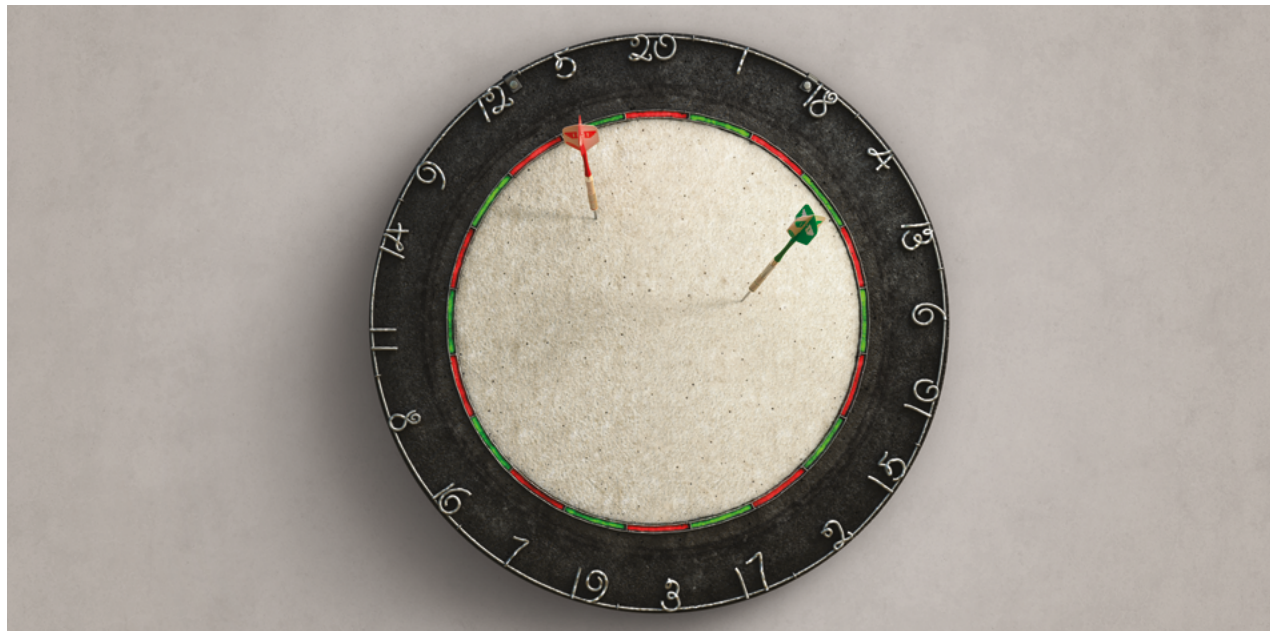
Informing our Players to Ensure their Protection

The cornerstone of our Responsible Gaming initiatives is related to our players themselves, namely providing all necessary information related to games, in order for them to decide if they will play and select how to play, according to their personal choices and circumstances.

'Outside the lines, there is no game' campaign

In 2018, we continued our informational campaign 'Outside the lines, there is no game', which reaffirms our commitment to create a safe environment for players and protect minors and sensitive social groups. The campaign's objective is to sensitize and raise awareness among players and the general public about the two basic rules of Responsible Gaming:

- Don't exceed your limits.
- Don't play unless you're at least 18 years old.



65% of people

believe that OPAP 'promotes responsible participation in games for money'. Presenting a 30% increase compared to 2017 survey findings.



90% of people

are aware that participation in OPAP's games of chance is allowed only for people over the age of 18. It is our intention to increase this percentage even further until it reaches 100%.



88% of people

are aware that in OPAP's games of chance one should play within limits.



35% of people

are not aware that entrance in OPAP agencies is not allowed to adults who accompany minors. This further encourages our commitment to continue educating the public around Responsible Gaming, including agencies, and especially the middle-older ages.

Source: OPAP 2018 surveys.

Remote gaming channels (online gaming)

We monitor players' participation in online gaming for OPAP S.A.'s games conformity with the applicable legal and regulatory framework in force including the current online sports betting regulation. Indicatively:

- We provide all necessary information on game odds in our gaming website www.pamestoixima.gr.
- We only allow people above 21 years old to register and use our gaming website. We request the necessary documentation to verify their personal data within 30 days (in case personal data are not submitted within 30 days, the player's account closes):
- We allow only one account per user and we always verify a player's email address, prior to verifying his/her electronic account.
- We inform self-excluded players about treatment referral.
- We maintain a record of players who want temporary or permanent exclusion from online participation (players provide an explicit consent to be registered in such records) and we do not allow players to register with a new account or connect to the gaming system, in case they are listed on it.

In addition, we allow players to:

- Regulate their gaming experience, as they can apply playing limits of their choice to participate in our online gaming services (e.g. set the maximum amounts that can be deposited per day, week or month, set their maximum betting amount per day).
- 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 deactivating their accounts.

It must be noted that a maximum deposit amount of €800 per player is set by law, which no player can exceed before their verification.

OPAP monitors the operation of online players' accounts and in case of infringement of the concession agreement, OPAP proceeds with closing the said accounts.



Video Lottery Terminals (VLTs)

Due to the launch of VLTs, we have included aspects related to the VLTs' element in the Responsible Gaming framework for OPAP S.A., conforming with the provisions of the applicable legal and regulatory framework in force. Indicatively, we:

- Allow operation of Play stores in specific operating hours.
- Prohibit installation of ATM machines inside or in front of Play stores.
- Require that all Play stores follow specific requirements regarding signing and labeling stickers
- Require the use of a strictly personal Individual Player Card, which includes information about the player's spending and frequency, in order to set their playing limits.
- Prohibit employees, partners and operators from playing VLT games at their own premises.
- Require players to present an identity document with a photo and date of birth (e.g. identity card, driver's license or any other similar official document) every time they are about to enter a Play store or the dedicated VLTs area within an agency.
- Integrate playing behavior control mechanisms to VLTs, by setting time and spending limits and warning messages to the player reaching these limits.
- Record extreme incidents and problematic behaviors.
- Include self-exclusion options (either for a 6-month period or permanent) to prevent participation in VLTs, which cannot be revoked for a 6-month time period.
- Prohibit entry to Play stores or participation in games to individuals who show signs that they are under the influence of alcohol or other addictive substances or sleepiness or whose physical and mental condition cannot guarantee the conduct of Responsible Gaming.
- Provide information about support and treatment to players and their families in cases of excessive participation.
- Ensure the availability of informational material with clear instructions on the rules governing the games and information on the winning chances for each game.

The above requirements are mandatory for all partners and operators in Play stores and agencies with VLTs, along with their employees. We continuously monitor the network's compliance with our Responsible Gaming framework and proceed with proactive or remediating actions, if deemed necessary.



In store communication

We comply with all labeling legal requirements to inform the general public, players and their relatives, as indicatively mentioned below:

- We updated the door sticker on the doors of our agencies to ensure customers are aware that minors, as well as adults accompanying minors, are not allowed to enter. We also created a new handout for points of sale to emphasize the related regulation and OPAP's commitment to its implementation.
- All our agencies and Play stores have clear labeling stickers, which indicate that participating in games is only allowed to players above 18 and 21 years of age respectively and encourage players to play within their limits.
- All our agencies and Play stores distribute information material regarding Responsible Gaming and operate a Responsible Gaming information point, where people can ask questions about Responsible Gaming.
- All advertising material and commercial advertisements for games include relevant labeling with the Responsible Gaming logo, the regulator, the legal age limit, the KETHEA- ALFA helpline number (1114), as well as the adverse consequences that may occur from irresponsible participation in games of chance.
- All relevant game guides are accessible by players and include Responsible Gaming messages, as well as information on game odds, age restrictions, the regulator, prohibition of selling on credit and the dedicated helpline.
- All our above-the-line campaigns (including TV and radio spots, as well as print campaigns) carry the Hellenic Gaming Commission's disclaimer.
- Extensive information on Responsible Gaming is available through our corporate website, our dedicated Responsible Gaming website and on every game's website.
- Posters are located in all of our agencies and Play stores to inform players about the basic rules of Responsible Gaming.

Player self-check

We have developed a self-assessment questionnaire, based on the Canadian Problem Gambling Index, in order to help players identify if they are experiencing any issue with excessive play. An interactive version of the questionnaire is also available at on our [website](#), featuring nine easily understandable questions, as well as virtual characters and animations. Upon completing the questionnaire, the player receives an overall score, which indicates the level of control the player has when playing.

Website information

We have created a dedicated section on Responsible Gaming in our Corporate Responsibility [website](#), which provides Responsible Gaming information to the general public. Similarly, Responsible Gaming messages and relevant information have been incorporated in all company websites.

Mobile application

We have included a dedicated Responsible Gaming section in our OPAPP mobile application, which informs players about the Responsible Gaming principles and the KETHEA-ALFA helpline number (1114).



RESPONSIBLE GAMING IN CYPRUS

OPAP Cyprus follows similar responsible gaming principles and values as OPAP S.A. Its objective is to establish a responsible and safe entertainment environment, where customers are respected, and minors and vulnerable social groups are protected against eventual harmful consequences caused by the company's activities. In late 2018, OPAP Cyprus issued its new Responsible Gaming Policy, which was communicated to all employees and agents.

All agents had relevant responsible gaming material distributed. In every agency there is a tv set (called Carousel), which displays relevant content to our customers, communicating information on how to "play" responsibly. We evaluate and assess the agencies' performance and compliance regarding the implementation of OPAP's responsible gaming principles, by performing "mystery shopping" inspections. In 2018, around 1,000 inspections were carried out, with 1 incident being recorded, where a person under the age of 18 was found within the premises of an OPAP store.

We offer training and support tools to our agents, as part of our Responsible Gaming Policy, focusing on procedures for identifying age limits and signs of problematic behavior among players, as well as providing information on referral of clients, exhibiting problematic behavior, to competent support and treatment bodies.

OPAP Cyprus, in association with the Ministry of Health, has established a national phone line (1444) to support people dealing with addiction to gaming.

Responsible Advertising and Marketing

In order to ensure that our communications are responsible, we fully comply with HGC's Decision no. 163/4C/09.07.2015. 'Regulating gaming commercial communication issues' (GG B' 1824) as currently in force, which defines the principles for gaming operators' communications, promotion, marketing and advertising activities and, generally, every aspect of commercial communication.

The Decision sets the general main principles of the gaming commercial communication that includes, among others, the following:

- Refraining from targeting high risks groups through advertising and marketing activities.
- Refraining from misleading the public about the odds of winning and the amounts that can be won.
- Refraining from offering irrational incentives, to attract more players promising guaranteed wins anytime.
- Describing in a clear way that profit is purely a matter of chance.
- Refraining from conveying the message that playing is a way of getting rich or a way out of financial difficulties.
- Refraining from offending ethics and traditions and encouraging racial discrimination or any discrimination regarding ethnicity, religion, gender or age.
- Refraining from associating playing with substance use and violence, sexual exploitation or illegal conduct.

According to the Code of Conduct and the Communication and Advertisement Policies on Responsible Gaming for both OPAP S.A. and Hellenic Lotteries S.A., available on our corporate intranet for all our employees, we ensure that all our advertising and other public communications are legal, decent and truthful, comply with the relevant regulatory framework and respect the rules of Responsible Gaming.

All sales promotion activities are approved by the competent regulatory body (three-member Supervisory Committee and/or the Hellenic Gaming Commission). We ensure they are decent, fair to participants, do not cause disrepute, respect participants' privacy and conform to the current regulatory framework and the corporate policies in force. Within this context, we have briefed all communication agencies and cooperate with them on policies and practices on what they can communicate, in line with our Responsible Gaming principles.

As a result, in 2018, there were:

- No written notices or legal actions regarding advertising and marketing communications, product and service information and labeling by the respective authorities.
- No cases of non-compliance with the regulatory framework in force recorded.
- No other relevant fines or other sanctions imposed by respective authorities.



Working with all Stakeholders on Promoting Responsible Gaming

We constantly promote dialogue and seek to build consensus together with key stakeholders, to ensure that the principles of Responsible Gaming are disseminated to the general public.

In 2018, we presented our Responsible Gaming strategy to the Hellenic Gaming Commission and engaged and collaborated with various stakeholders, who included among others:

- The World Lottery Association (WLA).
- The European Lotteries Association (ELA).
- Various academic institutions, such as the National and Kapodistrian University of Athens.
- The Therapy Center for Dependent Individuals (KETHEA).

We participated in a jointly organized two-day CSR-Responsible Gaming seminar by the World Lottery and European Lotteries Associations, during which we advanced our knowledge and skills related to Responsible Gaming and exchanged ideas and good practices with lottery members from around the world.

OPAP is a founding member of the European Lotteries Association (umbrella organization of National Lotteries operating games of chance for the public benefit in Europe) and the World Lottery Association, which participated and financially supported the Council of Europe's and European Union's Joint Project 'Keep Crime out of Sport' + (KCOOS+). The aim of the project is to support EU countries to implement the Macolin Convention's key provisions (convention on the manipulation of sports competitions to safeguard the sports integrity and ethics), set up national platforms, facilitate information sharing among key stakeholders and develop education and prevention initiatives.

The European Lotteries Association supported the ASPIRE (Activity, Sport, Play for the Inclusion of Refugees in Europe) project, led by ENGSO, which is an international project that focuses on the social inclusion of refugees. ASPIRE seeks to establish methods on how sports clubs can better support the social inclusion of migrants and refugees, capitalizing on the wide popularity of sports and other forms of physical activity.

Last but not least, OPAP is a founding Member of the Global Lottery Monitoring System (GLMS) which is a key partner of the KCOOS + project and the IntegriSport project. The IntegriSport project, which is co-funded by the EU ERASMUS+ program, will seek to raise awareness among law enforcement authorities across Europe on risks related to match fixing and other criminal activities endangering sport throughout Europe. The project comprises of two phases, the research phase and the awareness-raising phase and is run by CSCF (Counter Sports Corruption Foundation for Sport Integrity), together with 8 law enforcement and judiciary authorities from 7 countries and the Global Lottery Monitoring System. The Project is co-funded by the European Union and supported by Council of Europe.

Within 2018, OPAP supported 4 Responsible Gaming activities, as follows:

- The Helpline 1114 by KETHEA-ALFA.
- The '11th State of the Art Adolescent Medicine Course' conference, organized by the Adolescent Health Unit of the Children's Hospital 'Panagioti & Aglaia Kyriakou' and the Hellenic Association for Adolescent Medicine.
- The educational program 'Mental Health and Internet – Dysfunctional Behaviors Online – Ways of Intervention and Prevention', implemented by the National and Kapodistrian University of Athens.
- The Youth Power intervention program of the Adolescent Health Unit.



Treatment referral player helpline

We collaborate with the Therapy Center for Dependent Individuals (KETHEA ALFA) and we offer psychological support and advice not only to players but also to their family members.

Players who consider themselves addicted or at risk of becoming addicted to gaming (as well as their family members or friends), can contact the dedicated Helpline 1114 by KETHEA-ALFA, established in cooperation with OPAP in 2011, at a cost of a single local rate unit for consultation. Support information and services are also available via email at 1114a@kethea-alfa.gr. The line is supported by OPAP, operates Monday to Friday from 09:00-21:00 and is staffed by dedicated professionals. In 2018, there were 1,529 calls made to the helpline.

We receive KETHEA's monthly reports with statistical data about the helpline's operation, which are analyzed internally to record data such as callers' demographic characteristics, their playing habits, as well as their behavior in terms of playing frequency and spending amounts.

Intervention program

In collaboration with the Adolescent Health Unit, we have designed the 'Youth Power' educational intervention program that addresses pre-teenage children. The program, which utilizes an experiential learning approach, was continued in 2018 in order to:

- Inform and educate children on high risk issues such as addictive substances, excessive gaming, alcohol, smoking, risks and dangers on the Internet and school bullying.
- Provide the necessary information and develop their skills (e.g. strengthen their self-esteem, critical thinking).
- Strengthen children's positive thinking and promote healthy life choices.
- Facilitate relationships among young people.
- Sensitize parents and teachers

As a result, between 2017 and 2018, we delivered the program to 5,500 children of 5th and 6th grade, trained 275 primary school teachers from Athens, Thessaloniki and Ioannina, presented the program in 9 conferences, and communicated it to 20,000 Facebook followers, 11 Parent Academies across Greece, and a network of 10,000 educationalists, specialists and parents.

'YOUTH POWER' EDUCATIONAL INTERVENTION PROGRAM



5.500

children of 5th and 6th grade trained



275

primary school teachers trained

F.2.2 DRAW CREDIBILITY AND DATA SECURITY

Ensuring Credibility and Transparency of Draw Processes

The credibility of our draw processes is the single most safeguarding measure that sustains our relationship of trust with our players. We therefore place great importance on our draw processes to be perceived as being indisputably credible and objective by all our customers. For our operations, our top priority is to tackle credibility issues even further, injecting our game mechanism transparency and Responsible Gaming philosophy into all touchpoints and agents.

Draw Credibility in Mechanical Lottery Machines

With regards to the draw credibility in games that run through mechanical lottery machines, the following actions have been established:

- An independent 5-member Draw Committee (appointed by the Ministry of Culture and Sports), responsible for examining and ensuring the reliability of draws in LOTTO, PROTO and TZOKER.
- A specific draw regulation (Joint Ministerial Decision no. 7905/27.02.2009 GG B' 430/10.03.2009), which describes in detail all procedures that must be followed during the draws, as well as all the necessary corrective actions to apply in case of malfunction.
- An independent 15-member Audit Committee (appointed by the Ministry of Culture and Sports, Law no. 2843/2000), responsible for ensuring the reliability of draws. A file containing all participations for every draw, locks via a hash key and is transferred to an independent Computerized System. Only after data is secured and verified, the Audit Committee gives the final go to start the draw.
- Additional procedures to further ensure the uninterrupted operation of all mechanical lottery machines used for draws.
- The 24/7 monitoring of the drawing hall, where the draws are conducted, through a high-quality security system, and permission of access is granted only to authorized personnel.
- All draws are open to the public and are broadcasted live from a nationwide TV station.

Draw Credibility in Random Number Generators

We have systematically followed a number of key practices to ensure draw credibility in games that utilize random number generators. More specifically, the following actions have been established:

- Independent integrated secure cryptographic systems generating random numbers 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 (Joint Ministerial Decision no. 7905/27.02.2009 GG B' 430/10.03.2009), which describes all procedures to record numbers from every electronic draw after they are generated.
- An independent 15-member Audit Committee (appointed by the Ministry of Culture and Sports, Law no. 2843/2000), responsible for ensuring the reliability of draws. The Audit Committee verifies both participation and winners files' hash keys ensuring that there is no kind of external breach in the system.
- Electronic draw systems are located in secure areas, protected by special security and access control systems.
- A single way communication process between the Random Number Generator (RNG) system (created and maintained by Patras University's Computer Technology Institute and Publication) and our own central system which accepts betting from all customers, developed to ensure that the RNG system does not monitor the numbers chosen by players. The file with all participations closes and locks via a hash key when finalized and the system creates a different hash key to lock drawn numbers, which ensures the process's credibility and transparency.

It must be noted that in 2018, there were no legal actions on behalf of players regarding credibility of draws.

Ensuring Information Security

We implement several security controls to prevent security breaches, such as unauthorized data retrieval and storage and accidental or intentional destruction of information to ensure confidentiality, integrity and availability of information, games' operation and customer service provision.

Due to the criticality of our operations, we apply a wide set of controls and practices to ensure information security, which specifically include:

- An Information Security Management System to overview the security of information confidentiality, integrity and availability.
- Information Security Forum meetings for security, held at least semiannually, to identify significant information security risk trends, review serious information security incidents and recommend mitigation actions.
- Regular risks assessments to identify and prioritize information security vulnerabilities and define appropriate risk treatment plans.
- Regular security awareness and training sessions on information security, latest cyber threats and good practices, either through induction class courses or our e-learning platform.
- Administrative and technical controls to protect information, including intellectual property, stored on electronic and computing devices.
- Implementation of security by design practices to effectively ensure protection of information at all stages, at rest, in use or in transit, based on a combination of technologies, such as firewalls, intrusion detection and prevention systems and security information and event management systems.
- Data centers' physical and environmental security protection, with appropriate temperature and humidity conditions, protection against earthquakes and lightning strikes, fire detection and suppression, as well as a CCTV system.
- Access controls for all building facilities, which enforce restrictions on higher risk areas containing sensitive or critical information.
- Controls on gaming systems, including hardware encryption devices, which ensure protection of information stored in terminal machines and central database or transferred between systems.
- Audits and reviews of the Information Security environment are conducted on a yearly basis by the Group's external auditors and internally, by the Internal Audit Team, according to their plan. The IT Security Team and the DPO, along with the help of the Information Security Officer, also perform regular ad-hoc reviews.
- An independent 15-member Committee dealing with winners proclamation and objection trials for all games of OPAP S.A.' with 15 regular and 15 alternate members (public servants) 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 (not applicable for online betting, as there is no regulatory obligation).

All employees are obliged to promptly report any potential information security incident to the Security Incident Handling Team through email or phone. Examples of incidents include observed or suspected unauthorized action, misuse of information assets and security vulnerability or threat.

Within 2018, all security operations were performed successfully against our performance indicators regarding service downtimes, security testing, security incident service level agreements and security awareness.

Also, the Information Security Management System Framework and Policy were updated in preparation for the ISO 27001 and WLA_SCS Certification.

Protecting Personal Data

The issue of personal data privacy is particularly important for delivering our products and services to our users. For this reason, in 2018, we performed several actions, such as:

- Created a Data Protection Office and appointed a Data Protection Officer, in view of entry into force of the General Data Protection Regulation (GDPR).
- Prepared a compliance program to achieve timely implementation of required changes by May 2018 and effective compliance monitoring processes.
- Implemented appropriate technical and organizational measures to comply with the Data Protection Legal Framework.
- Revised all privacy notices in order to ensure full transparency and clearly communicate to our players and all other data subjects the purposes for which we collect and process their personal data.
- Adopted new policies and procedures, such as the Group Data Protection Policy, Privacy by Design Policy, Process for Handling Data Subject Requests and Process for Handling Incidents of Personal Data Breach.
- Applied all necessary measures to protect players' personal data in the context of high winnings payment and issuance of winning certificates.
- Complied with the GDPR, Law 2472/1997 and 3471/2006, as amended and in force, as well as the Hellenic Data Protection Authority's Decisions and EDPB Guidelines.
- Conducted risks assessments and audits, on a regular basis, to identify and prioritize data security vulnerabilities and define appropriate risk treatment plans. In 2018, there were no incidents of data breaching in relations to players' data. One data breach case that was related to other data subjects (business partners) was identified and was subsequently handled in accordance with the provisions of the GDPR and our internal data breach handling process. We addressed the issue to the Hellenic Data Protection Authority (HDDPA) and, where required, data subjects were notified.
- Within 2018 an Information Security Forum was established to enhance the Information Security risk management. The members of the Forum were the Chief Development Officer, the Chief Technology Officer, the Chief Financial Officer, the Information Security Officer, the IT Security Team Head, the Data Protection Officer and the Internal Audit Director. In 2019 the Information Security Forum was replaced by a formal Information Security Committee, chaired by the CEO.





MATTER OF FACT

In all the phases of the company's history, starting with the first small PROPO store coming to current most modern Agency there is one common point: Our network is the backbone of our business activities and operations.

F.3 Enhancing our Network

IN THIS SECTION

1. Investment and Transformation
2. Supporting our Network
3. Training our Partners



F.3 Enhancing our Network

Achieving common goals

OUR OBJECTIVE

Recognizing that we operate in a challenging economic environment, we dedicate our efforts to the development and upgrade of our sales network. Our aim is to place our customers as our top priority and provide the resources to improve our network partners' operations at every level.

KEY ACHIEVEMENTS IN 2018

- Implementation of the technology transformation project in our network.
- Supported the development of 505 new stores.
- Launched 3 new types of stores (Protypo, Mega Play, Block) and introduced Retail Excellence (REX) 2020 strategy & design standards.

KEY TARGETS FOR 2019

- Develop 350 new stores and renovate 150 stores
- Continue to develop our network, aiming at certifying 800 OPAP stores according to REX 2020 standards.
- Enhance our product portfolio offered in store with new launches such as Play Games JACKPOT or Kino in SSBTs.

OUR PROGRESS AGAINST 2018 TARGETS



95%
Achieved

5%
In progress



F.3 Enhancing our Network

F.3.1 INVESTMENT AND TRANSFORMATION

Our distribution network is one of the largest exclusive commercial networks in Greece, as we offer our games and services through 3,910 dedicated and branded agencies throughout the country, while a further 8,503 points of sale and street vendors are utilized to distribute SCRATCH tickets and passive lotteries. In addition, our network includes 351 Play stores in Greece and 201 agencies in Cyprus.

Geographical distribution of our network



Position



OPAP Stores



OPAP Play Stores



Hellenic Lotteries' Points of Sale

Position	OPAP Stores	OPAP Play Stores	Hellenic Lotteries' Points of Sale
Attica	1,528	148	3,830
Macedonia and Thrace	942	86	1,765
Western Greece	250	17	444
Thessaly	238	23	407
Central Greece	194	10	334
Crete	194	20	472
Peloponnese	193	15	416
Aegean Islands	184	18	475
Epirus	126	10	210
Ionian Islands	61	4	150
Total	3,910	351	8,503

Investing Consistently in our Network

We are committed to maintain a sales network that offers a state-of-the-art product and service portfolio to the wider customer base, as well as contribute to our network's smooth and successful operation, by investing in our agents' operations and systematically supporting them through various initiatives.

We propose new locations for development to our agents and indicate investment opportunities to establish a new agency, during which we:

- discuss investment opportunities with our agents,
- select the right location and the proper store to accommodate all our products,
- take into account our corporate identity rules and local restrictions, and
- create a modern agency from scratch.

We have implemented various initiatives to upgrade our network's image, improve its functionality and enhance its infrastructure, in our attempt to highlight our improved game portfolio and generate increased player traffic.

In 2018 we managed to build 505 new OPAP stores and deployed new technological equipment and new products together with intensive training sessions, to ensure the smooth operational transition of our partners. More specifically:

- **8,787 new Apollo terminals** have been installed, replacing the old Coronis terminals.
- **12,458 Digital Signage players** rolled out in our network.
- **18,944 VLTs** have been installed in **351 Gaming Halls** and **1,915 OPAP stores**.
- **5,370 opapbet terminals (SSBTs)** have been operating in **2,284 stores**.
- **838 OPAP stores** are providing bill payment services, and have been certified by the Bank of Greece
- **22,500 training hours** were dedicated in supporting the transformation.





Launching a new over the counter (OTC) platform

In 2018, through our major technology transformation project (see section C.4 Our Technology Capabilities) we replaced the Coronis terminals used in our network with the new Apollo terminals. This included the transition from the Intralot PAME STOIXIMA platform to the new BGT platform by offering an updated user friendly environment for the end user, while maintaining the existing Numerics platform.

With the transition to the new platform, we managed to cover all existing functionalities, created new ones and ensured easy to use and self-explained UI/UX (user interface / user experience) material for agents.

We achieved a smooth transition, with a minimum impact on the network's operation, while maintaining sales profitability.

Launching Tora services

Tora represents the “umbrella” brand for the value-added services provided through the two subsidiary companies of OPAP Group, Tora Direct and Tora Wallet.

Tora Wallet is an eMoney institution, licensed by the Bank of Greece, offering the full spectrum of services: payments, remittances, issuing of electronic money and payment accounts. At the end of 2018, there were more than 800 OPAP stores in the certified network of Tora. Within 2019 it is expected that the number of stores in the network will exceed 3,000. At the end of 2018, preparations were also in progress for the launch of a cash-to-cash money transfer service, that Tora Wallet plans to introduce in its certified network.

Additionally, through Tora Direct, customers can top-up their prepaid mobile phones by simply visiting an OPAP store. Tora Direct services can be found in approximately 7,000 locations (such as small retail shops, kiosks, gas stations) where mobile top-up vouchers and other similar electronic products are distributed through an advanced network of POS terminals.

Review the operating model for horse racing

In 2018, OPAP worked on changing its existing horse racing operating model and introduced a new racing product which will initially consist of horse and greyhound races. The new betting product will be part of PAME STOIXIMA and will aim to establish an appealing betting experience to all existing and prospective players. We work towards making the new products available in Apollo and Opapbet terminals, featuring brand new digital content. In addition, we plan to launch a new betting product in 600 OPAP stores in 2019, as part of our Go-to-Market strategy.

OPAP Play Stores

Since 2017, OPAP has established 351 OPAP Play stores across Greece, staffed with more than 2,000 personnel and equipped with 11,500 Play game machines, offering an exciting entertainment experience to over 250,000 players.

With the dynamic expansion of our network, the Play “wheel” spun around Greece, spreading the word of the new Play era to thousands of new players, who enjoy a brand-new experience in our newly established network of Play Stores. With the customer remaining at the center of our attention, we further invest in creating a 360° Play experience, which has a distinct “image, sound, taste and touch”, in order to establish every Play store as a unique entertainment destination.

As part of our commitment to transform our stores into unique entertainment destinations, we proceeded with the gradual removal of shades from Play stores’ entrance doors and windows. This initiative aims to enhance Play stores’ retail presence, increase the stores’ security and improve their visibility and overall image.

In July 2018, a new paperless registration process was introduced to players in all Play stores and OPAP stores with Play game machines. Each player can now be registered in Play stores via the VPRD computer application by providing only their identification document and signing the relevant registration form. Our partners can easily complete players’ registration forms through VPRD, at every point of sale. Through VPRD, agents, operators and employees can upload the forms, signed by the players, and directly send them to OPAP Helpdesk, where players’ registration forms are processed. This new process eases potential players’ registration and provides flexibility to OPAP Play members as they can store their registrant information in a secure space, safeguarding the information’s integrity.

In November 2018, we carried out our first outdoor advertising campaign regarding the promotion of our new Play stores. Following approval from the Hellenic Gaming Commission, we distributed special promotional leaflets at central points and hanged posters at local bus stops.



OPAP “Protypo” Store

The new “Protypo” agency was built in 2018, as a blueprint agency. This prototype agency is set to promote how future agencies are set to look. The “Protypo” OPAP agency was designed to offer an upgraded gaming experience, providing all gaming choices to its existing and prospective players.

With emphasis on functionality and ergonomics, the “Protypo” agency features distinctive play zones, display of digital content and full audio coverage. It also takes full advantage of new technologies and offers the full range of OPAP games, including innovative Opapbet terminals (SSBTs) and Play gaming machines.

OPAP Mega Play Store

The Mega Play store has been designed to implement best practices in the retail market, offering an enhanced entertainment experience. The first OPAP Mega Play store opened in Volos in May 2018. This new type of store offers a spacious “gaming zone”, an event-hosting area, digital signage screens as well as private “gaming zones” and a bar. Following the success of our first Mega store, we are proceeding with the opening of an additional eight Mega stores until the end of 2019.

OPAP Block

In September 2018, OPAP opened its first OPAP Block store. The OPAP Block store combines the best features of the OPAP “Protypo” agency and the Play store. It features a “gaming” space of 120 m², with a capacity of accommodating 50 gaming machines, offering an integrated gaming experience. By the end of 2018, 11 OPAP Block stores had been opened.



Retail Excellence Program 2020 (REX 2020)

In 2018, with a common goal of transforming our stores into unique entertainment destinations, we introduced for the first time the Retail Excellence 2020 (REX 2020) program. The program aims to continuously enhance the competitiveness and profitability of the network by providing the optimal customer experience in our stores.

It is an integrated support program created to assist our partners, to maximize their commercial success in 5 pillars:

- **Network development pillar:** establish an optimal store type and size in the ideal spot, to maximize the potential of the market
- **Look and feel:** set an ideal in-store atmosphere
- **Agent and staff:** provide specialized training to the stores' employees, ensuring the proper customer experience in the store
- **Digital assets:** leverage digital technology and create an immersive digital experience in store
- **Products and services:** assure proper presence of all games and promote gaming experience

This program is mandatory for all new, renovated and existing stores. To actively support the diffusion of this visionary program, our company funds our network with loans for constructions, big renovations and the installation of digital signage equipment.

The program's objective is to increase the competitiveness of our stores and upgrade our customers' experience. Retail teams and OPAP's partners can decide which is the best solution to adopt, based on the directions of the "REX 2020 design guidebook". This lays out the requirements and minimum commercial standards that agencies have to fulfil in order to get certified as a "REX 2020" agency.

By the end of 2018, 184 stores had been certified aiming to reach 800 certified stores until the end of the 2019 and continue to apply the program's best practices.



F.3.2 SUPPORTING OUR NETWORK

As part of our commitment to continuously invest and develop our network, we monitor each agent's performance on a daily basis, and provide suggestions for actions and initiatives to enhance our offering and achieve our common goals.

In 2018, as part of the reorganization process of our sales team, we developed a new organizational structure of front liners by introducing the new role of Account Manager, to achieve better support and the optimal operation of OPAP stores. Account Managers are set as the main communication link between OPAP and its agents, supporting the agents regarding any issue related to the operation and development of the stores (such as the stores refurbishment, continuance of training and staff development), as well as and their guidance for achieving our goals and optimizing our customer experience.

We utilized and materialized a number of channels and initiatives to maintain an on-going and effective communication with our agents and Play network operators in 2018:

- **35,250 one-to-one meetings** between Account Managers and agents in OPAP stores and 7,100 in Play stores.
- **17 Personal Advisors** for OPAP stores and OPAP Play network to provide personalized and effective partner support and service, as well as ensure their efficient operations.
- **3 B2B portals** **opapnet**, **opapnet|play** and **opapnet|laheia**.
- **24 combined working groups** between OPAP employees and agents and 5 working groups with Play partners (with 15 partners in each group) to discuss strategic priorities and align future actions.
- **10 large-scale events** in 9 cities between executives and OPAP store agents to communicate common objectives and discuss our network investments. Also **5 events** were held between executives and OPAP Play partners.



ON-GOING EFFECTIVE COMMUNICATION



35,250
one-to-one meetings



17
Personal Advisors
for OPAP stores and OPAP
Play network



29
combined working groups



OPAP Play Loyalty Program

Under the new GDPR regulation enforcement, we launched multiple initiatives to track updated loyalty consent from Play games' customers. In July 2018, the Play games Loyalty Framework was approved by the Hellenic Gaming Commission, thus enabling OPAP to offer loyalty rewards to Play games' customers.

As part of these important developments, OPAP ran a series of initiatives (such as sales rallies in Play and OPAP stores and outbound campaigns) and managed to double its contactable base from 39% to 83% (39 thousand to 92 thousand customers). From July until December 84,000 customers were rewarded via the OPAP Play loyalty program.

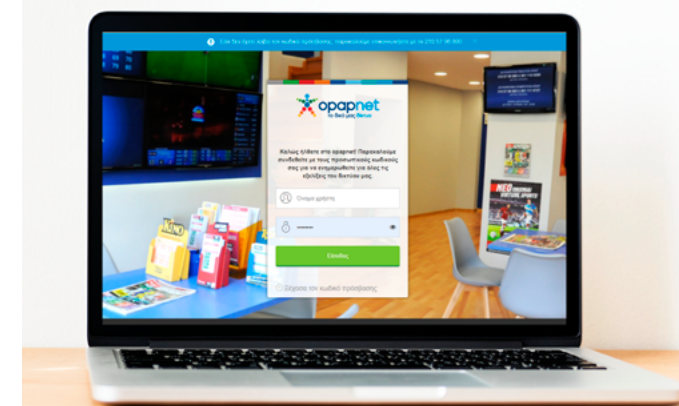
opapnet: Our means of Communication

In 2018, following our efforts to establish a direct communication relationship with our network partners, we pursued with evolving our B2B portals for OPAP Store and Play Store partners while we also introduced our indirect channel of Hellenic Lotteries' Points of Sale, with opapnet|laheia; the newest member of opapnet family.

In 2018, we made several improvements and added new functionalities into our opapnet portals to increase the level of support for our network's day-to-day activities, which included:

- Specially designed software to automate the activation of new opapnet users.
- Introduction of single login, enabling a 360° view of all stores.
- Introduction of new OPAP store roles (e.g. VLT operator).
- Personalized content based on business line or role.
- New tool for the management of the registration process, where credentials for Apollo terminals can be automatically obtained.
- Integration of opapnet|play portal on a new platform.
- Publication of reports to support new product launches (e.g. pamestoixima.gr) and provision of thorough operational monitoring (e.g. quarterly settlement issuance, minimum amount payment).
- New registry forms to support paper-free operations and serve new operational needs (e.g. REX 2020 program applications).

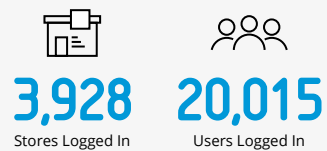
The importance of these portals to provide timely and accurate information regarding our partners' operations is indicated by the number of communication activities and the high-level of engagement with our partners through these portals.



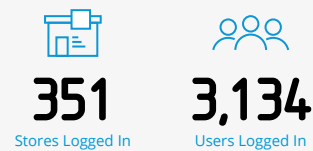
OPAPNET 2018 – At a glance



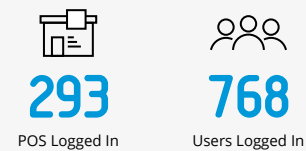
USER LOGINS (annual basis)



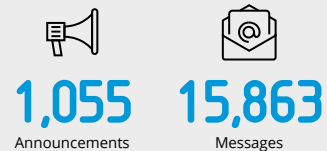
USER LOGINS (annual basis)



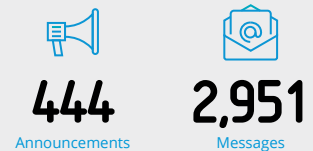
USER LOGINS (annual basis)



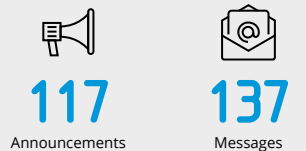
COMMUNICATION TOOLS (annual basis)



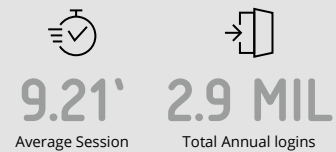
COMMUNICATION TOOLS (annual basis)



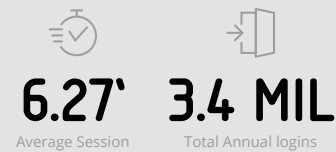
COMMUNICATION TOOLS (annual basis)



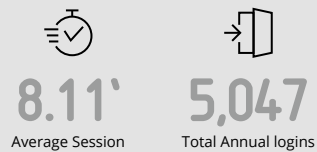
ENGAGEMENT



ENGAGEMENT



ENGAGEMENT



Go-to-Market of New Products

In order to help our agents, increase their customer base and competitiveness, we provide support during the roll-out of new products and services. In 2018, we assisted agents during the deployment of PAME STOIXIMA online through our Go-to-Market scheme. This included the development of agent incentives and affiliation schemes, the implementation of 360° communication (instore and internal) and the satisfaction of emerging legal requirements. Moreover, we developed business requirements, test scenarios and run selected user acceptance tests (UATs) for the retail related software updates. By the end of 2018, 9,111 new customer registrations (i.e. 35% of total registrations) were filed through the retail network.

OPAP Deals

In 2018, OPAP launched OPAP Deals, an agents' benefits program with central agreements and certified partnerships to support agents in operational expenses reduction, store construction and other services. Information on the central agreements' terms, agents' benefits and joining instructions is available through OPAPNET.

Performance Management

OPAP continued to support its partners' performance through performance management and bonus scheme. At OPAP stores, we continued our network performance scheme "opapleague" for the second consecutive year. This year's scheme focused on motivating our agents on improving their performance and efficiency, by rewarding them with monetary prizes. Targets were set according to commercial and objective criteria, focusing on the agents' strengths and areas of improvement. In the meantime, a new reward scheme has been developed to reward our top-performers. Within 2018 more than 1,200 partners have benefited from the new reward scheme.

At the end of the year we celebrated the work of our agents and the achievements of our top-performers by organizing the "agent of the year" event. The event was attended by agents from all around Greece and OPAP Senior Management representatives.

At Play stores, each partner is rewarded based on the percentage of their targets' achievement. In July 2018, a new performance management framework was deployed, where each partner is able to secure an additional commission, calculated as a percentage of the monthly rent, based on the monthly performance of his store, which is credited directly to his monthly paycheck. This provides an immediate "relief" to the operating costs of the store.



F.3.3 TRAINING OUR PARTNERS

We provide various training programs to our agents through our sales training team, either at our premises or in broader areas of their agencies, depending on our training plan, in order to ensure their smooth operation. In 2018, all training modules were filtered by a “Customer Treatment” approach. All existing and new trainings (online and classroom) were restructured to include definitions such as:

- Customer service and customer segmentation
- How to communicate effectively with clients
- How to translate product elements into client benefits

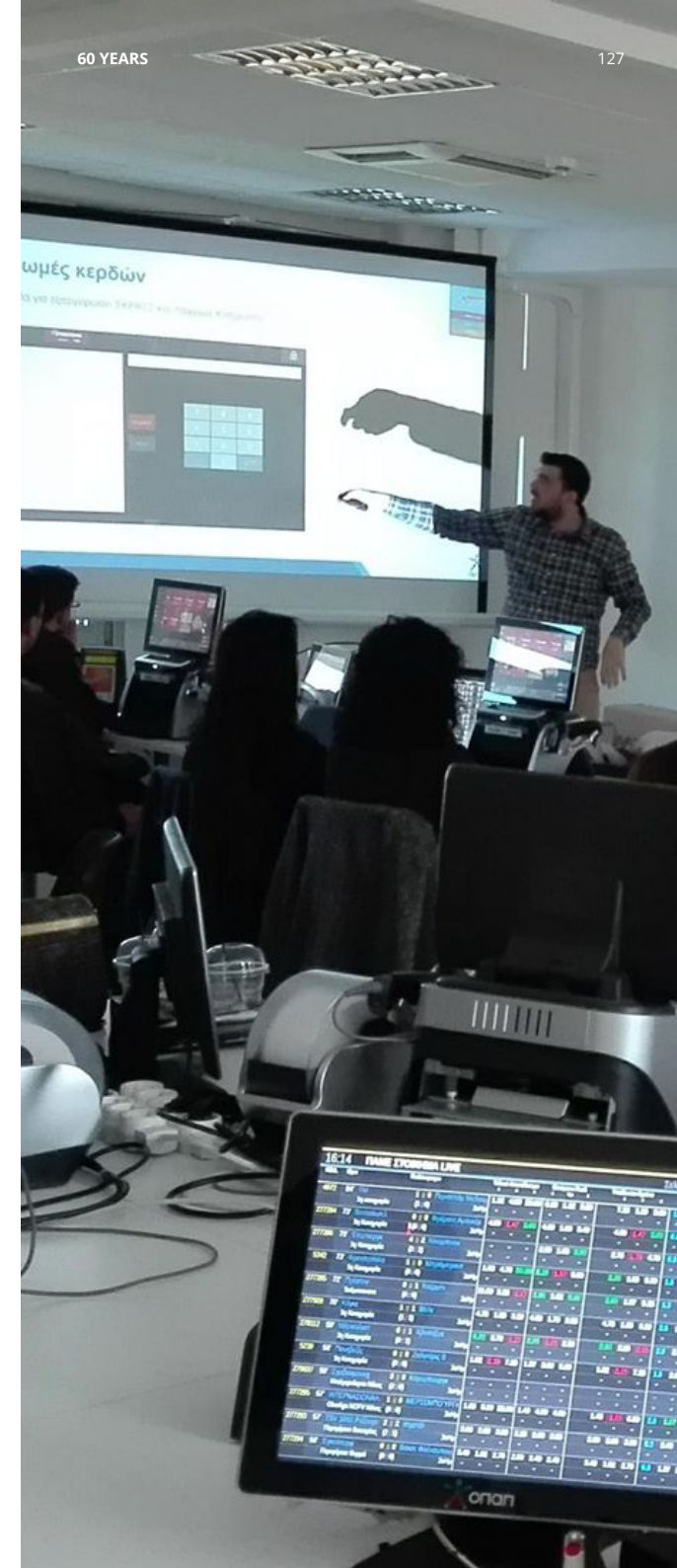
It must be noted that, if deemed necessary, employees from agencies and Hellenic Lotteries’ points of sale can participate in training programs regarding:

- Games’ rules
- Responsible Gaming
- Standard operational procedures and policies

Within this context, we materialized several initiatives to train our agents. More specifically we:

- Launched new training methods (simulation exercises) and modern interactive training material, for online training to further enhance the wide range of training programs for our sales network.
- Organized our training sessions in 7 training venues, 5 temporary fully equipped training venues and 17 hotel training throughout Greece.
- Provided on-the-job training within the first days of each OPAP Play store’s establishment.

We offered 5,908 classroom training hours (an increase of 10% compared to 2017) to more than 5,500 trainees (OPAP store agents and staff, Hellenic Lotteries’ distributors, street vendors, retail stores, OPAP stores’ and indirect channels’ Account Managers). The participants expressed their satisfaction with the training programs by attributing an average evaluation score of 98%.



OPAP Retail Academy

As part of our commitment to invest in our network's training and provide better services to our customers, we launched new training methods such as interactive simulations to ensure trainees' readiness in relation to the use of OPAP's new terminals. Additionally, we enriched our online training to offer new, updated and modern material, such as:

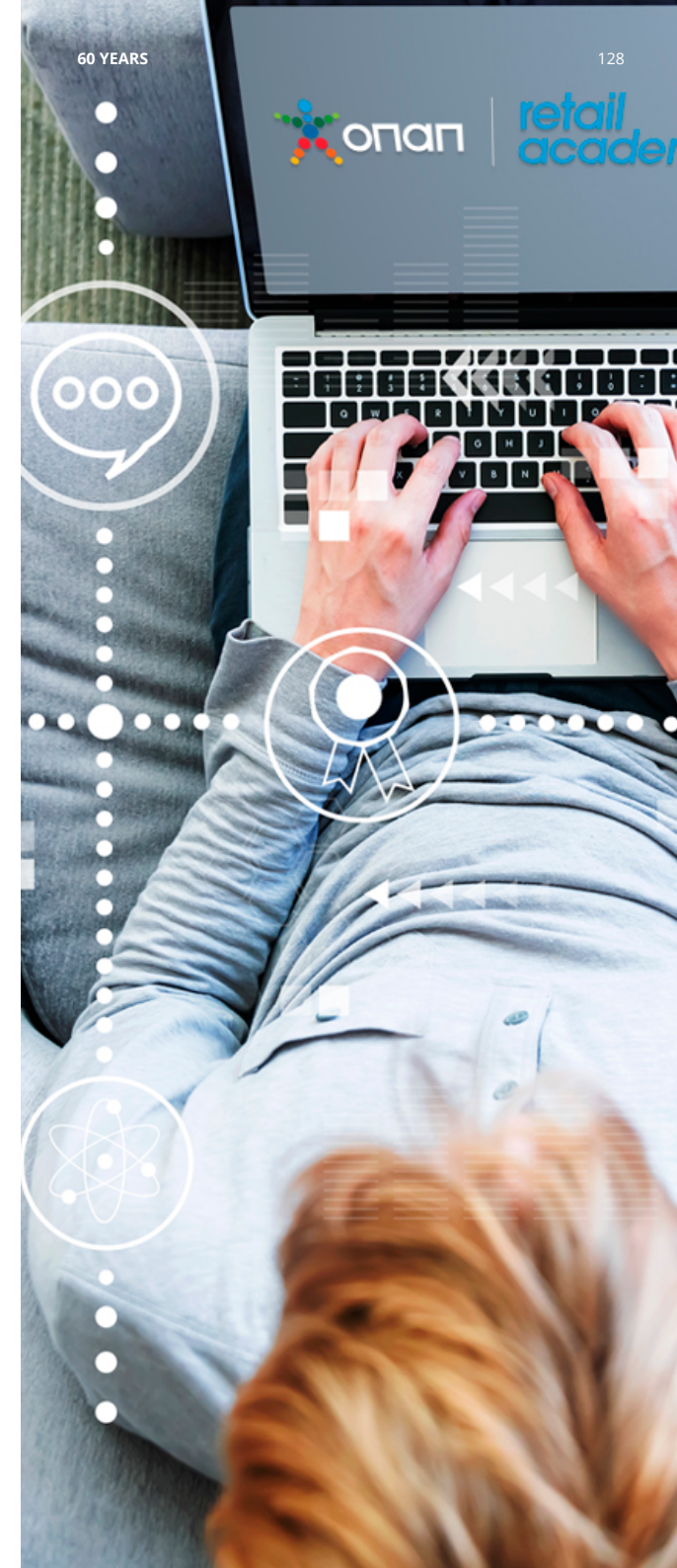
- 12 new e-courses in relation to OPAP's products, anti-money laundering policies, Tora Wallet services, terminals and other cash management tools.
- 28 new video tutorials regarding the operation of PAMESTOIXIMA online platform, Virtual Sports and players' digital signage, among others.
- 27 interactive simulations of PAMESTOIXIMA online platform, Virtual Sports matchday, numerical games in Apollo terminals and Kino side bets.
- Success stories scenario, where we used the pamestoixima.gr and VLTs' installation as case studies to disseminate information on best practices.

New Advanced Training Program for Play Store Partners, Operators and Employees

In 2018, OPAP continued to evolve its training program for Play store operators and employees, as part of its initiative to expand and develop its network. A total of 20,000 hours of on-the-job training were completed, both in OPAP training centers and stores across the network. More than 1,800 partners, operators and their employees participated in our training courses during the year.

The curriculum of our training agenda was designed to support the dissemination of knowledge on the optimal operation of our stores to existing teams, as well as to provide support to new Play teams, during their first months of operation. The agenda included:

- **Extensive 3-day training seminars** for Play Store operators and their employees, as well as one-day seminars for current agents, with a maximum number of 15-20 participants, in order to ensure the best possible experience.
- **On average, 3-5 days** of on-the-job training within the first days of each Play Stores' establishment.
- **Play games Specialist** 1-day seminars, to support Play teams in understanding Play Games through practical exercise in our training centers.
- **OPEN days** to help Play store teams (partners, operators and employees) try out our new games and learn their key-characteristics in practice.



New Certification of Knowledge Program for OPAP Stores

OPAP's customers are the centerpiece of the company's actions. They are the final recipient and reviewer of our products and services. The quality of the services and products they receive is paramount for the success of an agency and its respective sales growth. Therefore, in 2018, we launched OPAP's official "certification of knowledge" program in order to strengthen the competitiveness and profitability of our network by helping them increase their customer satisfaction rate. The certification comprises of two levels (the 1st and the 2nd level).

First level certification

The 1st level certification can be awarded through successful completion of a 5-day induction program (classroom training) or by achieving a passing grade in the "1st level certification" knowledge quiz in OPAP Retail Academy. In 2018, 1,058 agencies received the 1st level certification. Through the 1st level certification, OPAP agents:

- Verify that they hold the minimum knowledge of required products and procedures.
- Receive certification and confirmation for their acquired knowledge.
- Are eligible to be certified in the 5th pillar of REX 2020, "Associate and Personnel".

Second level certification

The 2nd level certification can be awarded through successful completion of a 1-day course (classroom training) and requires candidates to possess the 1st level certification as a prerequisite to enroll for the course. In 2018, 91 agencies received the 2nd level certification.

With the 2nd level certification (Advanced Customer Service Skills) OPAP supports the agents and their personnel who wish to further develop their skills in customer service techniques by:

- Teaching the basics of retail industry's evolution and current state.
- Defining the employees' main store responsibilities.
- Supporting the customers' sales path and all its "touch points".
- Strengthening their up-sell and cross-sell techniques (overall and per game).
- Assisting them to understand their customers' profile, through detailed segmentation analysis (who they are, what they want etc.)





MATTER OF FACT

Since 1958, the thousands of OPAP employees have all worked hard for this exceptional company. All of them – individually and together – shape OPAP's character, making it a truly unique institution.

IN THIS SECTION

1. Attract and Engage
2. Equality and Fairness
3. Health and Safety
4. Training and Development

F.4 Developing our People



F.4 Developing our People

A great place to work

OUR OBJECTIVE

Our People are at the heart of everything we do, bringing value and contributing to the success of our long-term strategic objectives, which lead us towards our 2020 Vision. We are committed to create a unique experience for all OPAP People; one that reflects our high performing culture and our values. We focus on being a great place to work by placing our People at the center of our strategy.

KEY ACHIEVEMENTS IN 2018

- 99% of our employees received a formal type of training.
- 121 new hires, with 40% being under the age of 30.
- Leverage new technologies for human resources management through the introduction of additional modules in PeopleOnline platform.

KEY TARGETS FOR 2019

- Optimize human resources' services, following best practices and technological advancements.
- Continue developing individual development plans via Opapacademy actions, classroom trainings, online development centers and teambuilding.
- Strengthen the effectiveness of internal communications channels and launch more wellness activations.

OUR PROGRESS AGAINST 2018 TARGETS

7 TARGETS

100%
Achieved



OPAP GROUP 2018 KEY FIGURES



40%
women in total workforce



78%
employees between
30 and 50 years old



97%
employees
with full-time contracts



66%
employees
with TEI / University education



98%
employees in Greece



171
new employees hired



5.31%
employee turnover



1,493
employees

F.4 Developing our people

F.4.1 ATTRACT AND ENGAGE

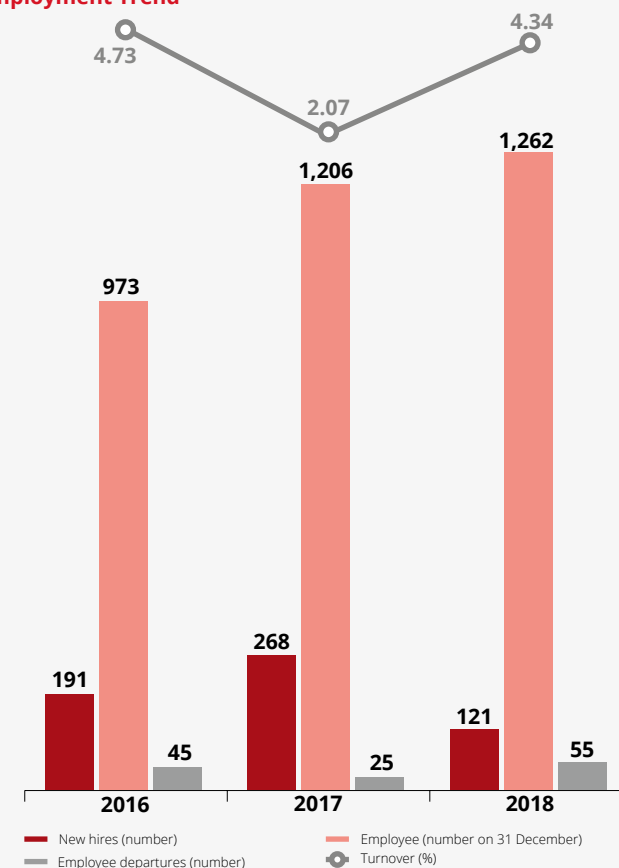
Achieving our strategic objectives and sustaining our growth, requires the establishment of an engaging work environment. OPAP, as one of the largest and most successful companies in Greece, employs 1,262* employees; a number that can be deemed rather large, considering the economic challenges that the Greek society faces. In addition to direct employment, we further leverage the creation of additional work positions all over Greece, with approximately 38,300 positions indirectly generated by our operations.

We are committed towards creating a positive, supportive, and dynamic work environment and therefore proud to have had:

- No variations in employment numbers due to seasonality.
- An average employee age of 39 years.
- 35 foreign and 8 handicapped employees working in OPAP.
- An average turnover rate of 4.3% (4.2 % of employees voluntary resigned, while 0.2% were dismissed).
- One employee who left before completing 12 months of employment (0.1% of total workforce).
- Average employment tenure of 5 years.
- 51 external partners working with OPAP during 2018, who focused on the construction, maintenance and development of our network.

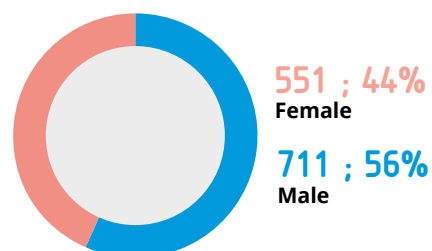
* Data refer to the companies OPAP S.A., HELLENIC LOTTERIES S.A., OPAP SERVICES S.A., TORA DIRECT S.A., HORSE RACES S.A. and TORA WALLET S.A..

Employment Trend

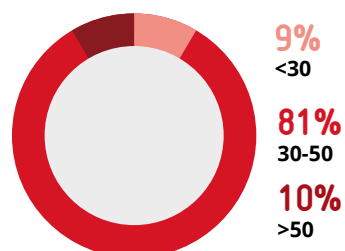


2018 EMPLOYEE BREAKDOWN

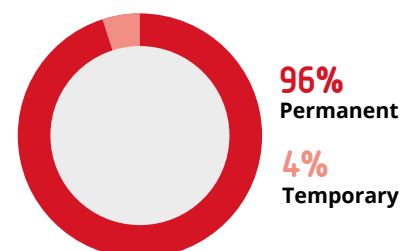
Gender Distribution
(number of employees ; percentage)



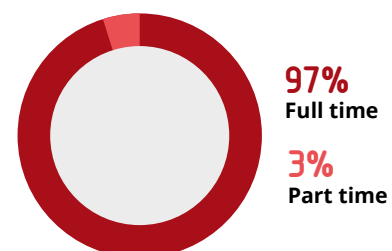
Age Distribution
(percentage)



Employment Type
(percentage)

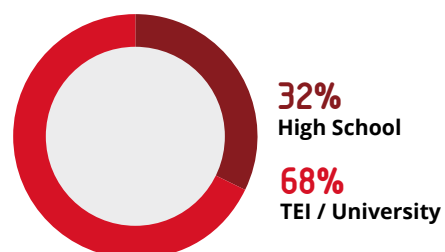


Employment Type
(percentage)

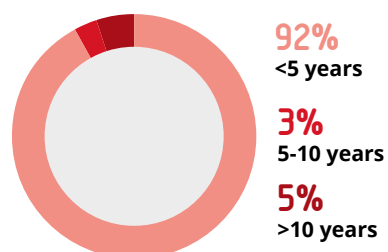


3% of total female employees with fixed term work contracts.

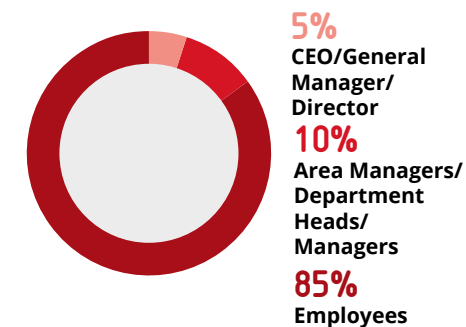
Educational Level
(percentage)



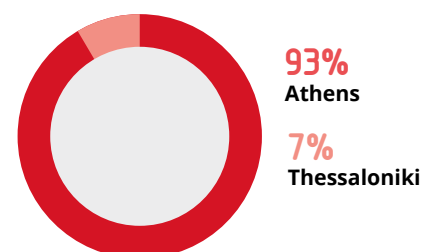
Employee Tenure
(percentage)



Hierarchy
(percentage)

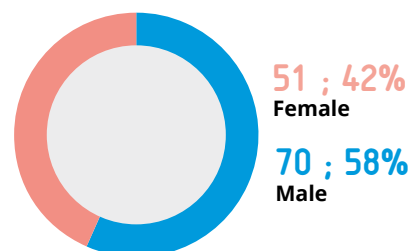


Workplace
(percentage)

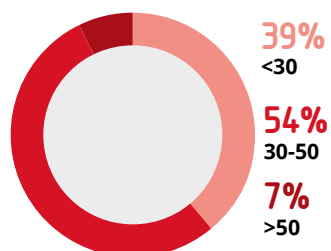


2018 NEW HIRES BREAKDOWN

Gender Distribution
 (number of employees ; percentage)

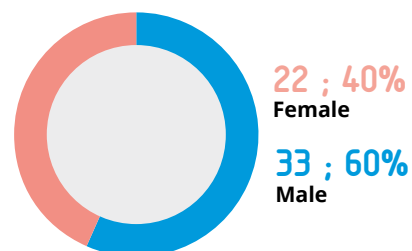


Age Distribution
 (percentage)

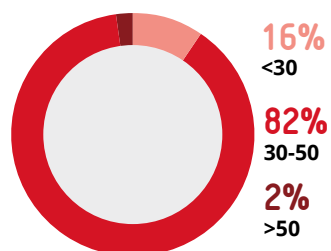


2018 EMPLOYEE DEPARTURES BREAKDOWN

Gender Distribution
 (number of employees ; percentage)



Age Distribution
 (percentage)



87%

of eligible employees participated in the 2018 employee survey (compared to 82% in 2017).



72%

in employee engagement was achieved, reflecting our strong relationship with our employees and our objective to create and enhance a positive work environment. The areas with the highest scores include Social Responsibility, Environment, Quality and Customer Focus, Trust in Top Management, Confidence in the Clear and Promising Company's Direction.

Identifying the Right Potential Candidates

An integral step to secure OPAP's future growth is to work towards attracting, inspiring and retaining high potential, talented professionals. In 2018, we met with over 1,200 candidates during several career initiatives and events, informing them about our performance-oriented mindset and took the time to understand their professional aspirations. Indicatively we took part in:

- The AUEB Career Fair
- The ALBA Career Forum
- The Deree Career Days
- The Kariera Career Days
- The UNIPI Career Days
- The Kariera Developers Day
- The ReGeneration Program

Furthermore, through our "OPAP Internship Program", we collaborated with many educational institutions, offering 6-month internship programs to undergraduate students. The internships gave students the opportunity to learn and gain professional experience in various teams and specialties (e.g. Marketing, HR, Network Development, Retail Marketing, Sales, Finance and Legal) within our Group.

In 2018, we offered internship opportunities to 61 students. These internships helped the students to develop valuable skills and advance their personal and professional development. 15 interns were offered positions within the Group following the completion of their internship. The "OPAP Internship Program" received very positive feedback from both managers and interns. 91% of managers stated they would recommend the intern for a future collaboration and 92% of the interns would suggest the program to a fellow student.

Finally, we conducted over 1,120 structured interviews throughout our intensive recruitment process and responded to all 9,000 applicants who sent us their Curricula Vitae.



Embracing the new "PeopleOnline" platform

In 2018, we launched the new, integrated, electronic human resources platform "PeopleOnline", to automate, further enhance and digitalize the human resources management processes, improving the experience of all employees. The platform includes a range of modules, such as:

- Performance Management and Development module.
- Employee Central module (Leaves application, Organizational structure, Employee profile).
- Recruiting module.
- Careers module.

"PeopleOnline", is available through all corporate devices (fixed and portable equipment) and mobile phones, making the platform modules more accessible.

Offering Additional Benefits to our People

We offer to our employees a range of benefits. Aiming to continuously improve our benefits, we cooperate with a leading insurance company to offer additional services to our employees.

In 2018, the total amount of investment in the private Medical and Life Insurance Plan exceeded €955,000. This Medical and Life Insurance Plan covers 95% of all our active employees (employees with permanent employment contracts and temporary employment contracts for over one year of OPAP S.A., OPAP Services S.A., Hellenic Lotteries S.A., Horse Races S.A., Tora Direct S.A. and Tora Wallet S.A.), with an annual checkup offered through the health insurance scheme, including digital mammography. Moreover, in 2018 we updated part of our policies (corporate cars policy, mobile and laptops policy).

Furthermore, we offer:

- Benefits relevant to business need (i.e. mobile phones, laptops, corporate cars, gas cards).
- Numerous internal and external parking spots for our employees in headquarters, as well as parking spots for all employees in Thessaloniki.
- Participation in the OPAP Employee Assistance Program.



Fostering Work-life Balance for our People

We shed great importance to our employees' dedication towards OPAP. We recognize that balancing professional and personal life, results in higher levels of employee engagement and performance. Therefore, we systematically work to ensure that all employees are able to achieve work-life balance and thus:

- Define clear daily working hours and time schedules for all employees.
- Comply with relevant legislation defining intervals between end of a shift and commencement of the next shift for applicable employees.
- Comply with the legislation on the annual overtime per employee being 120 hours.
- Do not tolerate employees working overtime, under the threat of any sanction (e.g. salary reduction or dismissal).
- Compensate and reward employees for their overwork (i.e. the first hour after the completion of the legal time schedule) and overtime (i.e. the first and second hour after overwork).
- Ensure that employees receive and utilize their entitled leaves (such as paid leaves).
- Grant special leaves to eligible employees when required (e.g. parental leave to new parents, breast feeding and child care leave to employees, leave for single parent families and student leave).



WORK-LIFE BALANCE 2018 HIGHLIGHTS



No employees

exceeded the annual maximum overtime limit and all overtimes were fully paid



51

female employees requested and were granted parental leave.



1

female employee was granted reduced working hours because of parenthood.



25

female employees who had received their parental leave returned to the company.



No employee

left the company within 12 months of returning from parental leave



19

employees (15 female and 4 male) were granted student leaves as part of their undergraduate or postgraduate studies.

Promoting Effective Internal Communications and People Engagement

The main driver of our commitment towards our employees is to engage and motivate employees to utilize their professional passion and sense of belonging within a fast-paced industry. By helping every employee to achieve their full capability, we recognize the importance of two-way communication to foster an open dialogue culture and utilize numerous touch-points to maintain an on-going and effective communication.

We enhance our employees' engagement, integrating our core values, through various activities. Notable activities include the "Happy Fridays" initiative (where we meet with each other and celebrate achievements), the bring-your-child-to-work day as well as the "Lunch with chiefs" and the "Breakfast with the CEO" (where employees interact with Top Management representatives, strengthening communication and sharing information and ideas).

In the beginning of 2018, we launched the recognition initiative "Star Team" and "Star of the Month". Every month all Group employees and all Teams have the opportunity to be nominated by the Senior Management Team in the respective categories and be awarded for their personal and team achievements by the CEO.

We also host a number of internal social events such as a Christmas corporate event, employees' children parties and events at the Horse Races venue in Markopoulo, as well as events to celebrate our achievements. At the same time we ensure that through internal activations, we inform our People about product launches and other key Group initiatives. In 2018, we launched the recognition event "OPAP Annual People Awards 2018" at our anniversary "60 years Christmas together" party, where 9 employees received recognition awards for their work at OPAP.

We send out regular posts in the renewed corporate intranet (OPAPopen) to inform our employees about corporate news, important initiatives and achievements, benefits and policies, as well as internal events, registering 85,400 monthly pageviews. In 2018, we sent out 200 mass e-mail announcements and 11 monthly OPAPulse newsletters. Through our internal social platform "Yammer", hosting 1,000 members, over 200 posts were sent out to promote and enhance collaboration, share company updates and celebrate achievements. In addition, we remain active on our social media accounts (i.e. LinkedIn, Facebook and Instagram), sharing our internal engagement initiatives and employees' success stories. Lastly in 2018, we circulated 14 internal communication announcements regarding Corporate Responsibility issues.

Our employees also engage in volunteering activities, such as participation in blood donations and fundraising running events.

For more information please see section F.5.1 Responsible donations and sponsoring.

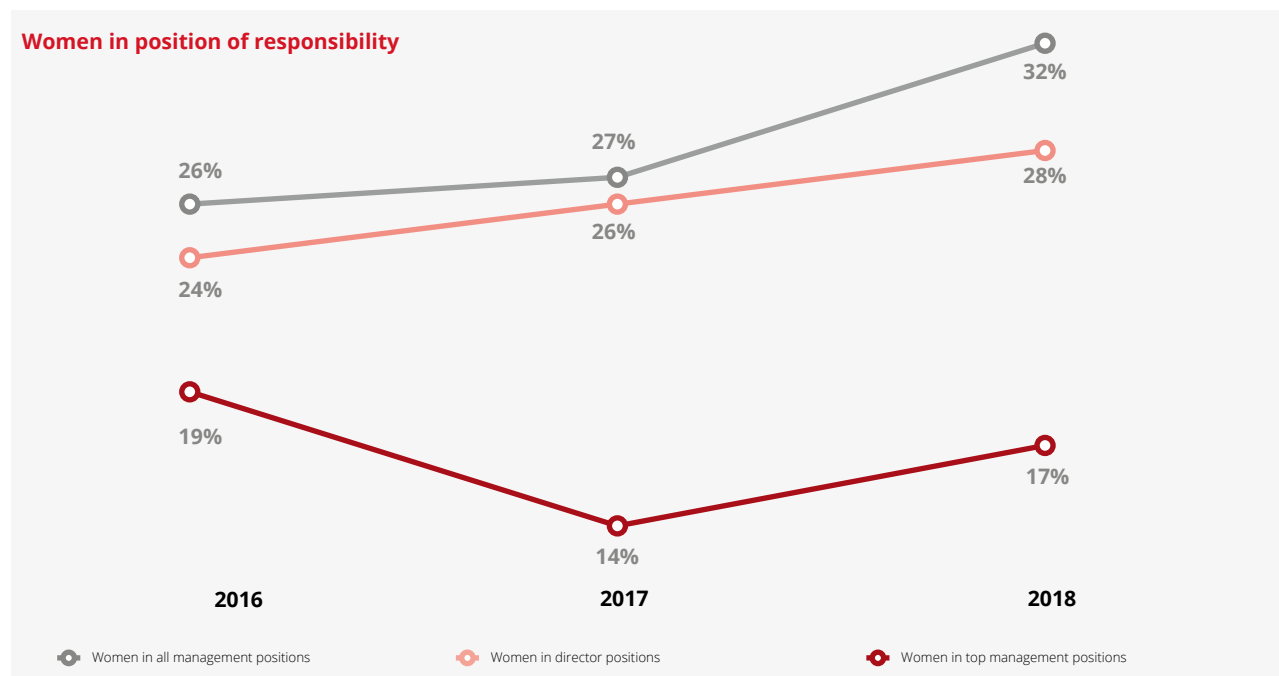


F.4.2 EQUALITY AND FAIRNESS

Integrating the notions of diversity, inclusivity and fairness within our core values, we establish a positive work environment which facilitates a performance driven culture. Consequently, we have developed a policy that condemns all forms of discrimination, such as discrimination against race, gender, marital status, political beliefs, religion, origin, sexual orientation, age and disabilities, regarding work issues, such as recruitment and selection, salaries, promotions and career development. We do not tolerate discrimination and treat all employees equally.

OPAP's positive work environment fosters the development and professional advancement of our employees, depending on their actual performance, their abilities to deliver and OPAP's success, rather than through prejudgment and prejudiced criteria.

OPAP, as a fair and equal organization, strives to bridge the gap between men and women in top management levels. We aim to foster a working environment with an open-minded company culture that sets diversity as a top priority. We encourage female employees to reach out for higher management positions and provide support throughout their professional development. We are proud to announce that, in 2018, 28% of directors and 17% of top management members were women.



EQUALITY & FAIRNESS 2018 HIGHLIGHTS

No complaints or grievances regarding labor practices or discrimination incidents or unfair treatment or human rights violation.

No legal actions regarding human rights issues and no fines or sanctions regarding human rights issues or labor practices were imposed by the respective authorities.

167 labor disputes for OPAP S.A. and 7 labor disputes for OPAP Services S.A. with former employees regarding non severe labor issues.

Establishing a **minimum salary**, which in all cases was **higher than the legal basic salary** (or the higher collective agreement salary), as defined by local legislation.

An almost **equal ratio of salary for men and women** within similar hierarchical level/area of activity/job family, with statistically insignificant variations, materializing the fact that salaries do not depend on the employees' gender.

A high percentage of Greeks in management and top management positions, being 97.42% and 33.33% (compared to 92.8% and 42.86% in 2017) respectively, while the percentage of Greeks in the BoD was 33.33%, compared to 42.85% in 2017.

Not Tolerating Child, Forced and Abusive Labor under any Circumstances

We fully and strictly follow the internationally recognized human rights principles, as described within the UN Universal Declaration of Human Rights.

Through our policies, which have been internally communicated and implemented, we commit ourselves to not encourage and tolerate any coercive or abusive labor in any of our premises. Also, we are committed to employ individuals, who are above the legal work age limit (as defined by the Greek legislation). As a result of our commitments, in 2018:

- Four operations were subject to human rights reviews (100% of total operations).
- No operations were identified as having significant risk for incidents of child labor or forced and abusive labor.



Respecting the Right of our Employees to Participate in Employee Unions

Adhering to internationally recognized principles of human rights, we respect the right of employees to participate in employee unions and discuss topics of reciprocal interest through representatives, as well as express openly and freely their opinion, either individually or in groups. In practice, in 2018:

- 28% of our employees participated in Employee Unions.
- All our employees were covered by the Greek National Collective Bargaining Agreement.
- No operations were identified in which the right to exercise freedom of association and collective bargaining may be at significant risk.
- 56 of our employees participated in four National General Strikes within 2018, 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 time lost due to strikes was 29 man-days, accounting for 0.0076% of the total working time.

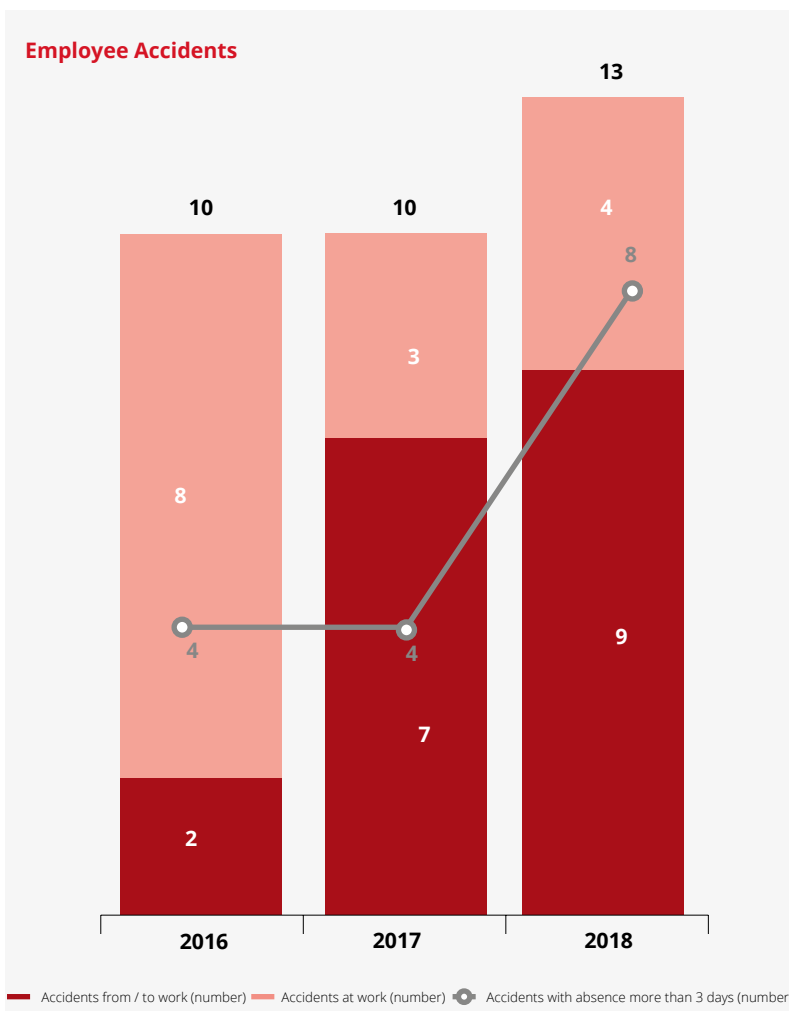
For major operational changes, we follow, as a minimum, the relevant regulatory requirements for notifying our employees.



F.4.3 HEALTH AND SAFETY

We believe that ensuring the health and safety of our employees is of the outmost importance, as it is a non-negotiable prerequisite for our employees' well-being and OPAP's successful operation. We focus on following health and safety regulations which ensure suitable and safe work conditions, through a number of systemically implemented practices. Indicatively we:

- Developed an **Occupational Health and Safety Policy** to illustrate our commitment to shape a preventive culture for health and safety at work, which has been communicated to all employees and outlines our activities to continuously improve our workplace.
- Implement a Health and Safety Management System based on the OHSAS 18001:2007 standard for Occupational Health and Safety.
- Perform audits on health and safety practices, within the scope of our Integrated Management System.
- Systemically identify occupational and work conditions risks in written Occupational Risk Assessment Studies, for both OPAP S.A. and OPAP Services S.A.
- Have established a Security Operations Center to monitor security and facilitates communication during emergency events 24 hours a day, 7 days a week.
- Have communicated detailed instructions for emergency evacuations, fire incidents and earthquakes to all employees.
- Conduct regular company-wide evacuation exercises, with two exercises conducted in our premises in Athens and Thessaloniki during 2018, where all employees participated.
- Upgraded our Building Management System (BMS) to improve and effectively monitor our cooling, heating and ventilation systems, as well as ensure prompt response to potential failures.
- Improved the air quality of our offices by adding humidifiers in the air-conditioning system and modifying their systems, to optimize their efficiency.
- Monitor the health and safety practices of contractors' employees working in our premises, as well as the safe completion of their activities.



HEALTH AND SAFETY 2018 HIGHLIGHTS

No losses

of OPAP or OPAP partners' employees.

766 employees

were trained on health and safety issues.

2,337 training hours

on health and safety issues.

No high incidence or risk of disease

associated with the employees' work. This was confirmed by the fact that no occupational diseases among our employees occurred.

No serious accidents

involving OPAP employees took place.

No incidents

involving a female employee took place

No legal actions regarding health and safety issues

were imposed.

No fines or sanctions were imposed

by the respective authorities.

Received the Gold Award for the "Healthy and Pleasant Workplace"

category at the Boussias Communication 2018 Health and Safety awards.

Wellness and Supportive Initiatives

Aiming to develop our employees, we continue offering high-level benefits and organizing actions that further improve our work experience. Within this context, the Health, Safety and Wellbeing Team (OPAPWellness Team) has been established to implement awareness and action initiatives that foster and support health, safety and wellbeing for all. The team comprises of members of the People Team and the Quality Management Systems Team, external partners, and also employees of the Group.

In 2018, OPAP ran the supportive OPAP Employee Assistance Program for all its employees and their family members in collaboration with a specialized and experienced provider. The program supported 335 employees and family members through 24 informative and interactive workshops and sessions in Athens and Thessaloniki in order to help our employees define, address and resolve key issues that affect them (such as nutrition, stress management, working relations crisis/conflicts management and parental and maternity issues). Employees and their family members may seek assistance in relation to personal matters and relationships, through a dedicated support line, 24 hours a day, 7 days a week.

At the same time, personal safety and self-defense lessons were offered to our employees. They were provided with safety tips and attended demonstrations of basic self-defense exercises to enable them to prevent potential risks and be able to protect themselves under any situation.

Lastly, we developed, in collaboration with the Red Cross a two-day First Aid seminar where our employees acquired useful knowledge on basic First Aid practices, learning how to act and what to avoid in a case of emergency.



F.4.4 TRAINING AND DEVELOPMENT

The need to connect our people's training and development with the strategic goals and results of the Group led to the creation of OPAPacademy in 2016, through which the development of a common communication language, a single Corporate Culture is being cultivated and an integrated customer-centric approach towards the internal and external customer. The strategic priorities of Opapacademy are:

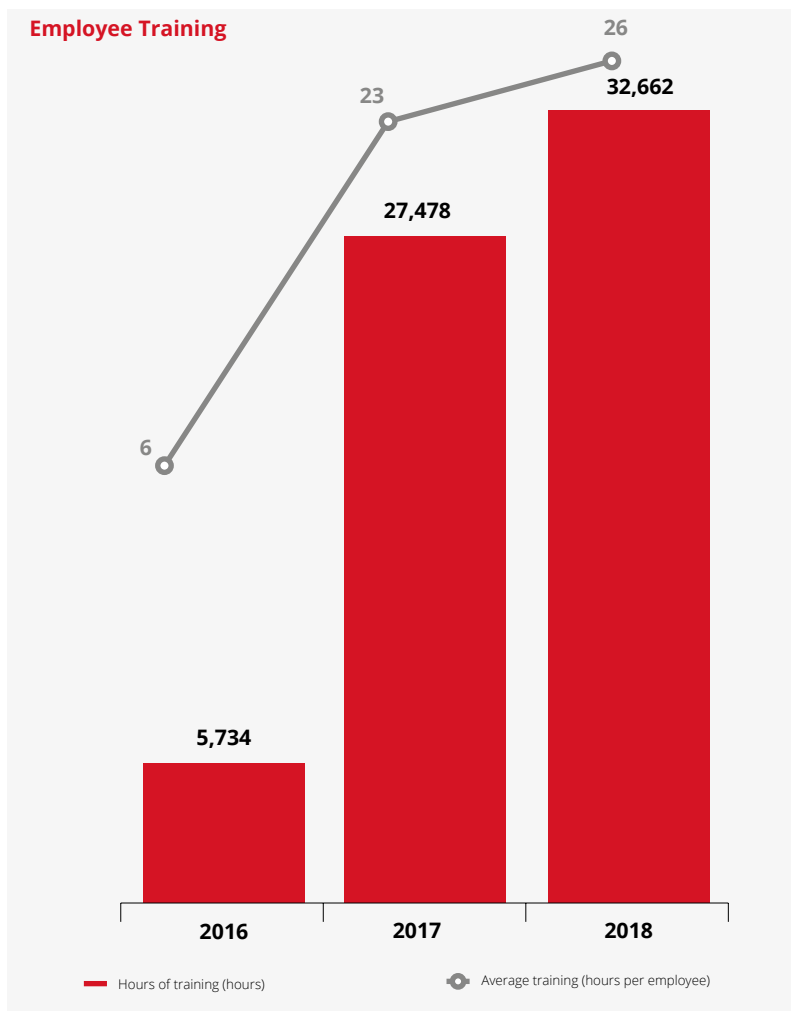
- **Developing a culture of continuous learning and evolution.**
- **Creating and maintaining a high-performance mindset.**
- **Empowering the leadership team.**
- **Talent development.**

Our objective is to train our employees on issues and skills that are linked to their personal development, through various means such as classroom trainings, e-learning trainings, conferences and on-the-job training with their supervisors' coaching.

Since 2017, our groundbreaking Opapacademy Online Development Center (eLearning platform) has helped our employees to enhance their skills and competencies through blended learning, which includes numerous online modules both compulsory and optional. Among the lessons that took place there were lessons on health and safety, Microsoft Office and organizing effective meetings.

In 2018, approximately 16% of total OPAP employees training hours were carried out through e-learning training courses. A great initiative regarding our online development center was the launch of two new "libraries" that included 45 new courses on a great variety of soft skills, promoting our efforts to enhance knowledge, skills and competencies. More specifically:

- 30 lessons for all OPAP's Professionals focusing on the development of team-building and working skills.
 - 15 lessons as part of a demanding training program adapted to meet the needs and demands of our Management Team.
- We conduct the majority of our training courses in-house, at our two state-of-the-art training centers located in our headquarters in Athens and our building in Thessaloniki, which house 100 and 40 seats respectively.
- In 2018, we implemented a broad range of training programs emphasizing on:
- Soft skills (e.g. Management, Leadership, Negotiation, Time Management, Presentation Skills, Interviewing Skills, Customer Service Skills, Working in Teams).
 - Technical skills (e.g. Finance for non-Financials, General Data Protection Regulation – GDPR, OHSAS 18001, Accounting, Procurement).
 - Certificates (e.g. Red Hat, PMP, IFRS, ISTQB, PMP).
 - Information Security Awareness Sessions: weekly informative sessions with rich themes in the context of information protection, aiming to increase the preparedness and vigilance against dangers of the digital age, with online simultaneously participation of our Team in Thessaloniki.



TRAINING 2018 HIGHLIGHTS



99%

of our employees received training



244

training courses were conducted



65%

of our employees were trained to develop long-term competencies, on skills such as Management Negotiation Skills, Finance for non-Financials and PMP Time Management.



90%

Opapacademy participants' feedback satisfaction rate



€370.000

was the total cost of training courses, compared to €240,700 in 2017.

Induction Program Training

In order to inform and educate our employees on issues related to our Group's Teams, Products, Strategic Priorities, Core Principles and Values, we continue the implementation of our extensive Induction Program. All newly hired employees participate in the Induction Program, within the first month of their employment, which specifically addresses the following:

- Company overview and history.
- Vision and Values.
- Company strategic priorities.
- Product knowledge.
- Code of Conduct.
- Health and safety.
- Awareness programs on Responsible Gaming, Information Security and the Integrated Management System.
- Teams mapping and team activities.
- Field visits, including two-day visits to OPAP agencies, PLAY Gaming Halls and the Prototy Store.

In 2018, the induction program was successfully completed for 96% of newly hired employees. The program was expanded to include our interns who participated in our 2018 internship program, with 100% of them completing the program.



Orientation training

The integration of new hired employees continues with an Orientation Training, which is conducted at Departmental level, with direct supervisors informing employees about their teams' operation, through:

- Meetings with the team members.
- On-site visit.
- Information on technical issues.
- Familiarization with the department's systems and procedures.
- Information on health and safety issues.

Academies Focusing on Individual Development

In 2018, we run three major programs focusing on individual development.

Leadership pathways academy

This 5-month development program is aimed at Group Directors to help them develop their leadership and people management skills.

Regional and account managers development program

This 5-month development program is aimed at the Regional and Account Managers of the Retail Team. The program consists of personalized programs designed to prepare and develop the participants for their roles' tasks. Topics included: "Excelling as Regional Manager", "Meet the Account Manager Role", "Presenting with Impact", "Advancing your Presentation Skills", "Finance for Non-Financials" and "Effective Negotiation Skills".

Teambuilding days

This initiative started in the end of 2017, aiming at the Management Team's members. In 2018, we expanded the initiative for all Group employees, who in turn had the chance to participate in numerous entertaining games designed to build team spirit amongst them, at an offsite location.

Annual Performance Management and Development Process

The OPAP Group carries out an annual performance management and development procedure for all its employees. The process takes place at the end of the calendar year, where the performance of employees' individual targets for the previous year is assessed. In addition, employees' performance targets for next year and individual development plans were set. Key Program elements are:

- Establishing a Common Competencies Framework for all employees
- All employees to have Individual Goals or Performance Standards based on their hierarchical level
- All employees to have Development Plans

In 2018, the annual performance management and development process was performed online for the first time, through the new "PeopleOnline" platform. All employees received a formal performance review.



Launch of Internal Career Development Opportunities Process

In 2018, by establishing the Internal Career Development Opportunities Process, the People Team committed to give priority to the existing human resources of the Group for internal staffing, through transparent and meritocratic processes.

We aim to retain our employees, offering them with development opportunities and supporting them in their professional career's next steps in the Group's companies. Therefore, our people are able to utilize their skills and gain new knowledge, develop new professional skills and have a career within the Group and further understand the Group's operations.

The talent acquisition team investigates the staffing options, making use of its existing database and by announcing job openings through OPAP's corporate intranet, calling the interested persons to apply. In 2018, we published 41 internal job postings on our corporate intranet and managed to cover 27% of permanent job openings by internal candidates, compared to 12% in 2017.





MATTER OF FACT

In the six decades of its history, OPAP has been standing beside Greek society in practice, through its substantial investment. Today, OPAP remains fully focused on helping create a better future for Greece's younger generation.

F.5 Supporting our Society

IN THIS SECTION

1. Responsible Donations and Sponsoring
2. Responsible Procurement
3. Environmental Impact



F.5 SUPPORTING OUR SOCIETY

Striving for a better future

OUR OBJECTIVE

We believe that our role in society transcends our business activities and we have the responsibility to support social growth and prosperity. Thus, we are committed to support and benefit different stakeholders and underprivileged social groups, facilitate our supply chain's growth and responsible operation, as well as safeguard the environment and reduce our potential impact on climate change and resource use.

KEY ACHIEVEMENTS IN 2018

- Completed the renovation of the daily care unit and the Wing A of the 2nd Pediatric Nursing Unit at the hospitals 'Aghia Sophia' and 'Panagioti & Aglaia's Kyriakou' respectively
- Launched our Supplier Code of Conduct
- Development and certification of an Energy Management System according to ISO 50001

KEY TARGETS FOR 2019

- Complete the renovation of the 4th floor at the 'Aghia Sophia' Children's Hospital and the 2nd floor (Wing A) at the 'Panagioti & Aglaia's Kyriakou' Children's Hospital.
- Recruit more SMEs in "OPAP Forward" program with the objective of creating a team of 50 SMEs.
- Ensure that at least 20% of personnel are exposed to environmental awareness initiatives.

OUR PROGRESS AGAINST 2018 TARGETS



92%
Achieved

8%
In progress

F.5 Supporting our Society

F.5.1 RESPONSIBLE DONATIONS AND SPONSORING

Contributing Responsibly to our Society's Needs

OPAP's mission to create value for its stakeholders emanates from our formal mandate to support social growth and prosperity of our society. We contribute through our societal support programs, donations and sponsoring activities. We collaborate with numerous foundations and charitable organizations, receiving public recognitions as well as accredited certifications for our work.

Our social support initiatives focus on three main pillars, namely sports, health and employment. In addition, we continue our long-standing commitment towards responsible gaming and our work supporting sensitive social groups and communities.

Societal Support Focus Areas



SPORTS

We build the future of sport on solid foundations



HEALTH

We upgrade medical infrastructure for our children



EMPLOYMENT

We reinforce the Greek market



SENSITIVE SOCIAL GROUPS & COMMUNITY

We support society and vulnerable groups



RESPONSIBLE GAMING

We educate the general public on responsible gaming

Contributing responsibly to our society's needs

In recent years, we have made significant financial contributions, striving to make a difference through large-scale initiatives and thus contribute towards the development of our society, secure a better future for our youth and have a long-lasting positive impact on Greece's economy.

In 2018, we provided € 23.8 million of financial investments to materialize 368 activities. We estimate that around 1.4 million people benefited from our activities.

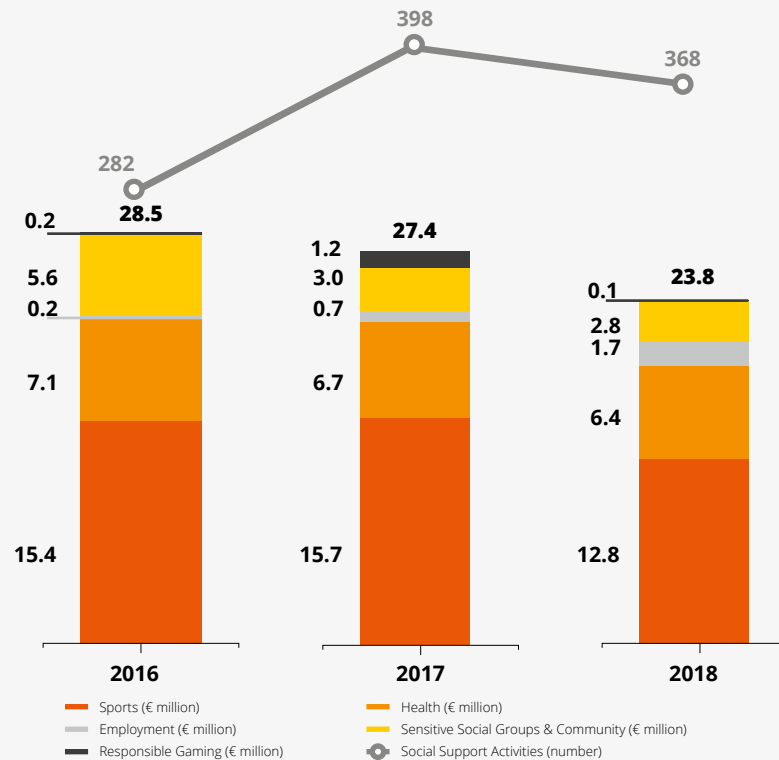


€23.8 M
of financial investments



368 ACTIVITIES
materialized

Societal Support Program Investments per focus area and support activities (€ million)



OPAP ACTING AS A "RESPONSIBLE CITIZEN"

We operate in local communities, respecting all citizens' well-being. We are proud to report that, in 2018, we had:

No operations

with significant actual and potential negative impacts on local communities and our society.

No cases

of human rights incidents affecting local community

No cases

of disputes with local communities

No complaints

or legal actions related to our society impacts

No relevant fines

or other sanctions imposed by the respective authorities

Taking measures to ensure responsible sponsoring

We take measures to ensure that donations and sponsorships are responsibly used, in line with the requirements for which they were provided. More specifically:

- We require the recipients of donations and sponsorships to submit sufficient evidence and documentation for their sponsored activities, before we grant them any funds.
- In case of construction projects, we perform on-site inspections and request photographs and other related documentation to ensure that these projects have been performed as agreed.
- In case of sponsorships, an independent contractor conducts monitoring visits and reports any findings to OPAP.

Recognizing the impact of our sport sponsoring practices, both at local and national level, we apply several responsibility practices in our sponsoring contracts with sport teams, such as:

- We include a clause to invest approximately 20% of each contract value to support young people.
- We include a clause against violence (since 2010) to enhance the pivotal component of safety and security in stadiums (e.g. installation of cameras and turnstiles), with relevant clauses being included in most new sponsorship contracts within 2018. In 2018, we imposed over € 150,000 in penalties for incidents of violence in sport stadiums, which were reinvested to enhance safety measures.
- We cooperate with an independent auditing company to monitor expenditures in all contracts.
- We recursively monitor expenditures in centrally managed contracts.



58%

of the people asked identified OPAP as the most recognized company in Greece in terms of social support activities.

60%

of the people asked were aware of OPAP's leadership in corporate responsibility.

73%

of the players asked verified that they are aware of OPAP's leadership in corporate responsibility.

Source: OPAP 2018 surveys.

Key 2018 Programs and Initiatives

Children Hospital Renovation program

Since 2014, we have been continuing our contribution to the Health sector, by sustaining the [Children Hospital Renovation](#) program at the Children's Hospitals 'Aghia Sophia' and 'Panagioti & Aglaia Kyriakou'. Through this program OPAP aims to:

- Upgrade the hospitals' nursing units and outpatient clinics.
- Create a pleasant therapeutic environment to accelerate children's therapy.
- Renovate the hospitals' premises, waiting and examination rooms.
- Improve the working conditions for the medical and nursing staff.

In 2018, both hospital buildings had 50% of their renovation completed. A total of 22 renovation works that included 15 nursing units were completed, covering a total of 9,230 m² and with a capacity of 321 beds. Specifically, in 2018, OPAP completed the renovation of the daily care unit at 'Aghia Sophia' that included the renovation of the surgical complex and all areas of the unit, the creation of a three-bed capacity recovery room, as well as five nursing rooms with a total capacity of 21 beds. Also, the company delivered the renovated central sterile service department of the hospital, for which OPAP implemented a full reconstruction, ensuring that the unit has the appropriate facilities for its proper operation. Furthermore, all areas of the unit were equipped with the latest medical equipment. Finally, in 'Panagioti & Aglaia Kyriakou' the 2nd Pediatric Nursing Unit of the 1st floor (Wing A) of the hospital, of a total surface area of 550 m² and with a capacity of 20 beds, was renovated.

 [Watch the video](#)



RENOVATION PROGRAM 2014-2018



50%
of Children Hospital renovation completed



9,230 m²
renovated



321
Beds



15
nursing units

OPAP 'Contribution Squad'



Aiming to engage the general public with the children hospitals renovation initiative, we have launched, since 2014, the engaging OPAP 'Contribution Squad' initiative, inviting people to get involved in the project through an engaging and fun mobile app.

Around the time of the Authentic Athens Marathon, OPAP invites the general public to download –for free– the **'Contribution Squad'** mobile app. The app encourages the public to participate in fun challenges and gather points. OPAP translates the points into actual financial investment for the children hospitals' renovation work.

In 2018, 276,855 people downloaded the 'Contribution Squad' mobile app and participated in the engaging challenges. OPAP translated a total of 3,492,539 points into actual investment for the continuation of the renovation work in both Children's Hospitals. It should be highlighted that this amount of money was only part of the total investment realized by the company for the renovation project.

OPAP used the "Contribution Squad" app as a tool to communicate and engage with the general public and disseminate news about its corporate social responsibility activities and initiatives.

 [Watch the video](#)

Health: "OPAP in the Neighborhood" Preventive health examinations Program

OPAP, having acknowledged the need for health protection, implements a Medical Prevention program together with "The Smile of the Child". In collaboration with the recognized organization "and its three Mobile Units, we began to offer preventive health checks to adults and children in cities across Greece.

In 2018, 9,928 people, in 52 towns and cities across Greece, were examined. Our key goal was to help people get the right health screening, detect health problems early as well as help them take steps that could improve their chances for living a longer and healthier life.



64
locations across Greece



23.493
Kilometers travelled



12.176
children and adults examined

 [Watch the video](#)



OPAP Sports Academies' program

Having set as a priority to build solid foundations and create value for future generations, we continued the '[OPAP Sports Academies](#)' program for the fourth year. Our objective is to instill the values of fair play, devotion, respect and team work in children.

Since the launch of the program in 2015, we have accomplished prosperous results towards our effort to upgrade the athletic education standards. Indicatively:

- 28 Sports Academies Festivals have been organized all over Greece (such as in Heraklion, Patra, Argos, Thessaloniki, Peristeri, Ioannina, Xanthi, Volos, Larisa, Katerini and Kallithea).
- Over 32,000 children have participated and been supported through the program's educational initiatives, experiential activities and sports festivals.
- 475 hours of coaching and 3,000 trainings hours for parents, children and coaches have been carried out.
- Approximately 6,000 children, between the ages of 6 and 12, have been informed on healthier nutrition.
- Over 25,000 parents have been informed and supported on issues related to children's psychology, nutrition and first aid.
- 20,000 balls, 125 sets of training equipment, 15,100 pairs of shin guards and 7,000 child-size identification markings (badges) have been distributed to the participating academies.
- Over 20,000 children and parents/guardians have participated in the several activities and sports events, organized within the context of our participation in the 'European Sports Week #Be Active' that ran for the fourth consecutive year. This is an initiative from European Commission that aims to promote sport and physical activity across Europe, supported and enacted by the Ministry of Culture and Sports, General Secretariat of Sports.

[▶ Watch the video](#)



'SPORTS ACADEMIES' PROGRAM 2018



128
amateur academies, in 49 regional units, were supported



13.000
young athletes were supported



700
academy coaches were provided ongoing consultation and training, by continuously enhancing their technical knowledge, through workshops and training sessions



20.000
parents were supported on psychological, pediatric and nutritional issues

'OPAP Forward' program

Our overall positive impact in the Greek economy is further enhanced by our decision to support entrepreneurship, through the implementation of our integrated program '**OPAP Forward**' under the pillar of Employment. The objective of the program is to select and provide support to fast-growing Small and Medium Businesses and as a result foster the creation of more job opportunities and stimulate financial prosperity in the Greek economy.

OPAP collaborates with the global non-profit organization Endeavor, to ensure the program's effective implementation. With Endeavor's support, the selected companies will be able to grow fast, create jobs and contribute to the growth of the economy.

In 2018, the program supported 40 SMEs from various sectors (such as retail, shipping services, food processing, technology, pharmaceuticals) by providing:

- Expert advice and strategic guidance from over 70 successful entrepreneurs and top executives.
- Extensive training by experienced consultants and business executives in key functions of business operations such as business strategy, financial management, human resources management, marketing, sales and communication.
- Access to a network of investors and financing options in collaboration with the National Bank of Greece.
- Support to design a strategic plan and expand their operations and activities in foreign markets.
- Numerous networking opportunities among participating companies and other entrepreneurs, through exclusive events such as workshops

According to data from Endeavor, the program has helped the participating companies create 417 new direct working positions and support 3,184 new indirect job positions through the establishment of new collaborations, while at the same time increase their total turnover by 20%.



'OPAP FORWARD' PROGRAM 2016-2018



160

meetings with the mentors
of the program



140

strategic guidance sessions
with the high-end profes-
sionals



60

connections and meetings
with large foreign companies



26

educational seminars

OPAP on the side of people affected from the Eastern Attica fires

From the first moment, OPAP stood by the side of the local communities affected by the Eastern Attica wildfires during August 2018.

The company supported the work of the Municipality of Marathon hosting and supplying food for the people affected by the fires. Also, at OPAP's initiative, personal hygiene and cleaning supplies were gathered and distributed to those in need.

Ultimately, the recovery after such a disaster takes a great deal of combined effort. OPAP, driven by its interest in youth and in close collaboration with the local authorities, undertook the restoration of the 2 schools which suffered significant damages from the wildfires. In just 25 days and through a series of construction works, the company completely transformed the 2nd High School of Nea Makri (attended by 270 students) and the 1st Vocational Lyceum of Rafina (attended by 150 students).

In September the 2 schools welcomed the students in a more functional and appealing environment.



'Wishing Ornaments' program

Since 2014, OPAP has been standing by the side of NGOs across Greece, that support children in real need, through the **'Wishing Ornaments'** initiative. The aim of this initiative is to make everyone part of a greater effort, through the fulfillment of simple child wishes. At the same time, OPAP implements infrastructure projects for the children's support organizations, to improve their quality of life. In 2018, we invited the children supported by "The Smile of the Child" organization to draw their wishes on a simple piece of paper. During the Christmas season, these drawings were exhibited in high traffic Athens and Thessaloniki Malls, where people could choose a child's wish they would like to make true by buying the respective gift. Additionally, for the very first time, people across Greece had the opportunity to fulfill children's wishes through the "Contribution Squad" mobile app.

In total, 7,517 children's wishes came true. The gifts were delivered during a very special event with the participation of well-known celebrities and athletes as well as OPAP employees. Additionally, OPAP proceeded with the following construction works for "The Smile of the Child", that included the:

- installation of a professional kitchen in the Peristeri and Moschato facilities.
- construction of a playground in the NGO's facilities in Corinth.
- purchase of domestic equipment.
- upgrade of infrastructure in the NGO's facilities in Aigio.



'WISHING ORNAMENTS' PROGRAM 2014-2018



22,283
children's wishes were fulfilled



29
construction works were completed for NGOs across Greece



CONTRIBUTING TO CYPRUS' SOCIETY

OPAP Cyprus has a strong relationship with the Cypriot society, since its first days of operation. Its core business activities are integrated with its corporate responsibility mandate, through the implementation of societal support programs, aimed at creating value for society and improving citizens' quality of life.

OPAP Cyprus's main objective is the creation of added value to the community of Cyprus. We focus our efforts on the following 5 pillars:

- **Sports:** OPAP Cyprus, contributes to the development of Sports in Cyprus by sponsoring numerous federations, sports associations and athletes. We aim to foster the ideals of sport, fair play and decent competition
- **Health:** We contribute to the upgrade of Cyprus' offered health services. In 2018, OPAP Cyprus supported the establishment of Karaïskakio Foundation's Center for Childhood Cancer, a modern diagnostic and research center focusing on the treatment of childhood cancer, giving life and hope to dozens of children.
- **Education:** OPAP Cyprus stands next to the country's new generation, by supporting competent bodies and initiatives, aimed at improving the quality of education offered to the youth of Cyprus.
- **Culture:** We are a major sponsor of many cultural events.
- **Environment:** OPAP Cyprus, respects the environment and works towards its protection, organizing actions focusing on a cleaner, more beautiful and humane Cyprus.

60 years OPAP: Charity gala in support of ELEPAP and "Together for the Child" association

OPAP celebrated its 60th anniversary with a glamorous event dedicated to children. On the 18th December 2018, the company held a charity Gala in support of the Hellenic Society for the Protection and Rehabilitation of Disabled Persons (ELEPAP) and the "Together for the Child" association.

The corporate responsibility initiative was embraced by OPAP's business partners and famous personalities from the world of business and sport, who attended the event and provided financial aid to both associations. The money raised in the context of OPAP's charity gala was offered to support ELEPAP's "Financial Adoption of Children" program, which aims at the cognitive, socio-emotional, psychomotor and sensory development of children, and "Together for the Child" association's "I contribute because I care" program, which aims at gathering basic resources to support institutions serving children and families in need.



Cultivating the Importance of Volunteer Contribution Amongst our Employees

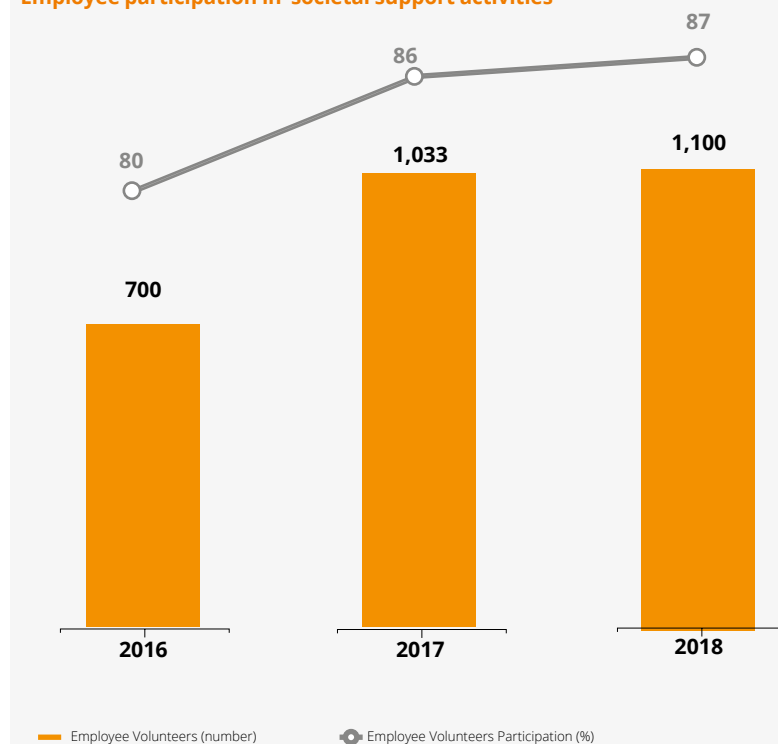
We believe in communicating the importance of volunteer contribution and cultivating the spirit of volunteering among our employees. We encourage our employees to utilize their skills in creating lasting benefits for society, as well as integrating the concept of responsibility in their way of thinking and behaving. As our engagement with our communities continues to grow, it is our responsibility to turn our employees into enthusiastic contributors of initiatives and programs supported by OPAP, responding to the need for the wider well-being. We consequently promoted a series of volunteering events and facilitated employees' participation within 2018, with 87% of our employees participating in activities, such as the following:

- Voluntary blood donations.
- 'Wishing Ornaments' initiative.
- 36th Athens Marathon.
- Distribution of equipment to assist flood-impacted areas in Western Attica.
- Visits to Children's Hospitals 'Aghia Sophia' and 'Panagioti & Aglaia's Kyriakou'
- Participation in the "Race for the Cure®", organized by the Pan-Hellenic Association of Women with Breast Cancer "Alma Zois".

We committed to promote corporate responsibility within OPAP through our Corporate Responsibility Day 2018, organized for our employees. One of our most notable initiatives was "The big clean up", which included awareness seminars held at our headquarters, featuring presentations about the importance of taking action on environmental issues. As part of the initiative, more than 100 employees cleaned the Peace and Friendship Stadium's (SEF) beach, collecting more than 1,650 kg of waste.

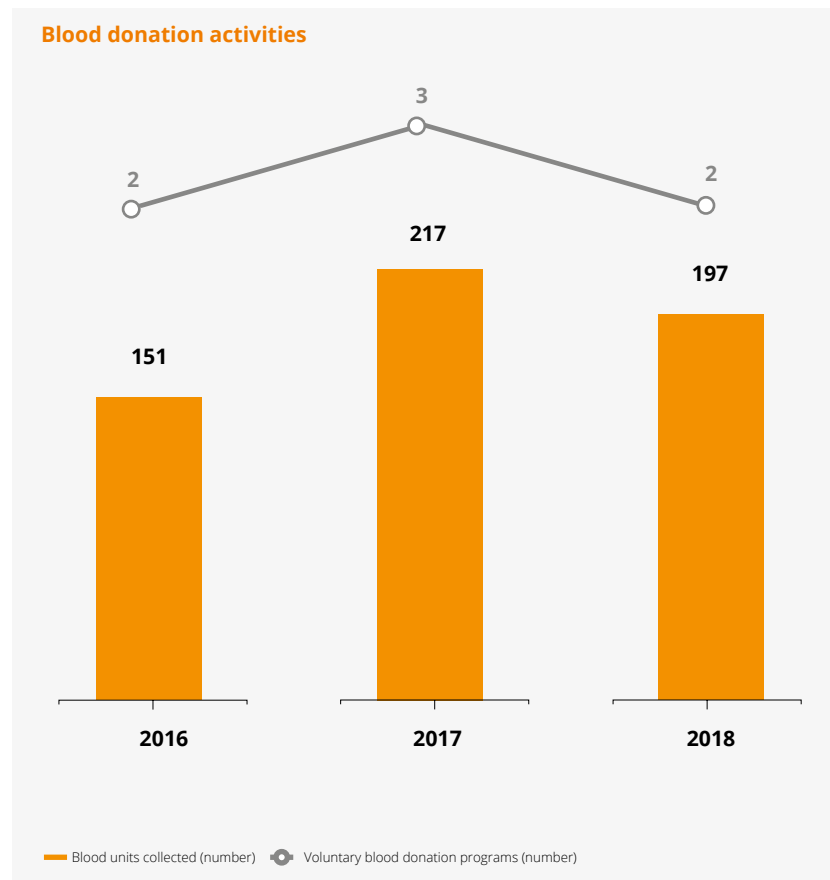


Employee participation in societal support activities



Voluntary Blood Donation

In 2018, we gathered 197 blood units from 2 voluntary blood donations to support the needs of employees, their families, as well as society in general, with 37.5% of gathered blood units utilized for community members' needs. In total 216 people participated.



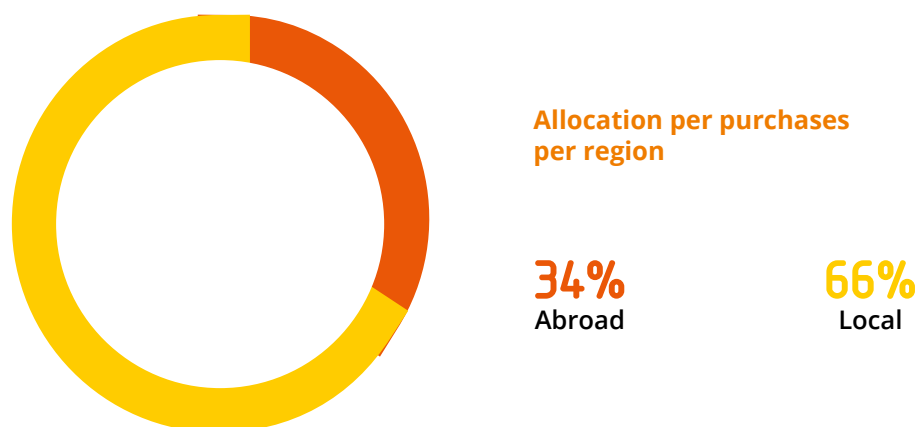
F.5.2 RESPONSIBLE PROCUREMENT

We fully acknowledge that our suppliers' activities and actions can influence our own responsible operation and therefore strive to build a sustainable supply chain. We interact with our suppliers in a transparent and objective manner and offer equal opportunities to all. Our list of suppliers includes suppliers who offer sales and marketing services, office consumables, retail agency consumables, IT infrastructures and applications, telecommunication services, facility services and logistic services.

We utilize our outreach and size to support the local economy in the areas we operate, by collaborating with local suppliers and purchasing locally produced products and supplies. In order to enhance national and local development, in 2018 we:

- Collaborated with 2,643 suppliers throughout Greece and abroad, with approximately 94% of them being local suppliers (2,483 local suppliers), compared to 93% in 2017.
- Spend 66% of our total procurement budget to local suppliers, compared to 72% in 2017.

At the same time, we aim to treat our suppliers fairly and adjust our payment terms and bank guarantees to market conditions, by taking into consideration the current financial situation in the Greek market. The payment time of contracts is performed according to the contractual terms within 60 days from invoicing.



Influencing Positively our Supply Chain

Being one of the largest companies in Greece, our size has created the moral obligation to systematically disseminate, deploy and promote the principles of corporate responsibility throughout our supply chain.

Suppliers are expected to operate according to the respective legislative provisions. Therefore, we have included a clause in all formal tenders and agreements with our significant suppliers with an annual spending of over €50,000, which specifically states the requirement to comply with labor, environmental and occupational health and safety laws and regulations.

In 2018, OPAP issued a new Supplier Code of Conduct. The new Code was communicated and signed by all suppliers who signed contracts or participated in tenders with an annual budget over €100,000.

We maintain a registry of our active suppliers with updated financial and business data on an annual basis, including potential certifications according to ISO 9001, ISO 14001, ISO 27001, SA 8000, OHSAS 18001 and/or other standards.

Becoming more conscious of the environmental and social impact of products acquired, we utilize the registry information mainly regarding suppliers providing products and services with increased environmental and societal impact, such as cleaning and security services.



Evaluating our Suppliers

Since 2017, we have adopted a systematic approach for our annual supplier evaluation process, which includes:

- Quality evaluation for all our significant suppliers, based on the total turnover value and their strategic importance.
- Environmental and health and safety evaluation for our significant suppliers based on their field of operation.

At the same time, we perform ad-hoc supplier evaluations in cases of specific business requirements (e.g. as part of an upcoming large tender, contract renewal or potential suppliers).

Materializing our supply chain approach into practice within 2018:

- 100% of new suppliers (with contracts over €50,000) signed that they comply with respective environmental, labor, human rights or society legislative provisions. No formal audits for new suppliers regarding the above issues were conducted.
- 55 suppliers were assessed for environmental impacts and 45 for occupational health and safety impacts (representing 36.6% and 30% respectively of significant suppliers with an annual spending of over €50,000), without any further actions.
- There were no cases of suppliers with whom our collaboration was terminated (or not initiated) due to actual or potential compliance issues (e.g. for incidents of corruption, anti-competitive behavior, non-responsible communication or poor health and safety performance).



Supplier evaluation criteria

Type of Evaluation	Criteria
Quality Evaluation	<ul style="list-style-type: none"> • Delivery quantity • Required quality • Time accuracy • Support and communication • Know-how • Number of awards/offers • Cooperation and flexibility • Invoice Accuracy
Environmental Evaluation	<ul style="list-style-type: none"> • Environmental policy • Environmental compliance • Periodical environmental impact assessments • Measures and programs to mitigate environmental impact • Environmental violations and fines
Health and Safety Evaluation	<ul style="list-style-type: none"> • Occupational health and safety compliance • Occupational health and safety in corporate policies • Internal or external health and safety assessments • Top Management commitment to improve work environment • Health and safety violations and fines

F.5.3 ENVIRONMENTAL IMPACT

As a growing business, we are conscious of global environmental issues and work systematically towards minimizing our potential negative impact throughout our operations, by complying with current environmental legislation and relevant provisions, as well as conducting all necessary environmental impact assessments.

Managing Systematically our Environmental Impact

OPAP, through its **Environmental and Energy Policy**, is committed to conducting business in an environmentally responsible way, acknowledging that protection of the environment, energy saving and conservation of natural resources, as well as the active contribution against climate change are integral parts of responsible and sustainable business development.

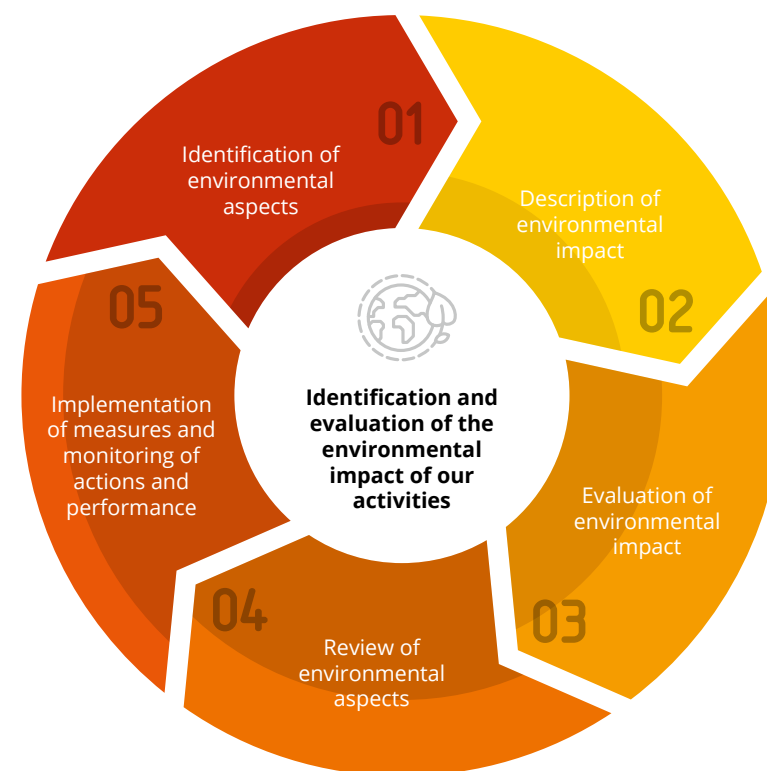
As part of our certified Environmental Management System according to ISO14001:2015, we apply best practices to manage our operations in a way that prevents environmental pollution, regarding both our own operations, as well as our main suppliers' operations, through specific provisions in RFPs, awards and contracts.

In this context, we systematically identify and evaluate the environmental impact of our activities. As a result, in 2018, we identified the following environmental aspects as the most important:

- Energy consumption
- Paper consumption
- Life-cycle management of hazardous materials (e.g. electrical equipment, toners, light bulbs).

To further improve our approach, we developed an Energy Management System, which was certified according to ISO 50001, in 2018. The system assures our compliance to the energy management law.

In 2018, we reviewed and improved our environmental monitoring mechanisms and recalculated the 2017 data; hence the data provided in this section of the report refer to the last 2 years of operation.



OPAP ACTING AS A "RESPONSIBLE CITIZEN"

We are proud to report that, in 2018, we had:

No environmental incidents of any kind.

No complaints or accusations of violating any environmental legislation.

No written notices or legal actions by the respective authorities regarding environmental issues.

No relevant fines or other sanctions imposed, during the scheduled and ad-hoc audits conducted by the respective authorities.

Energy Consumption

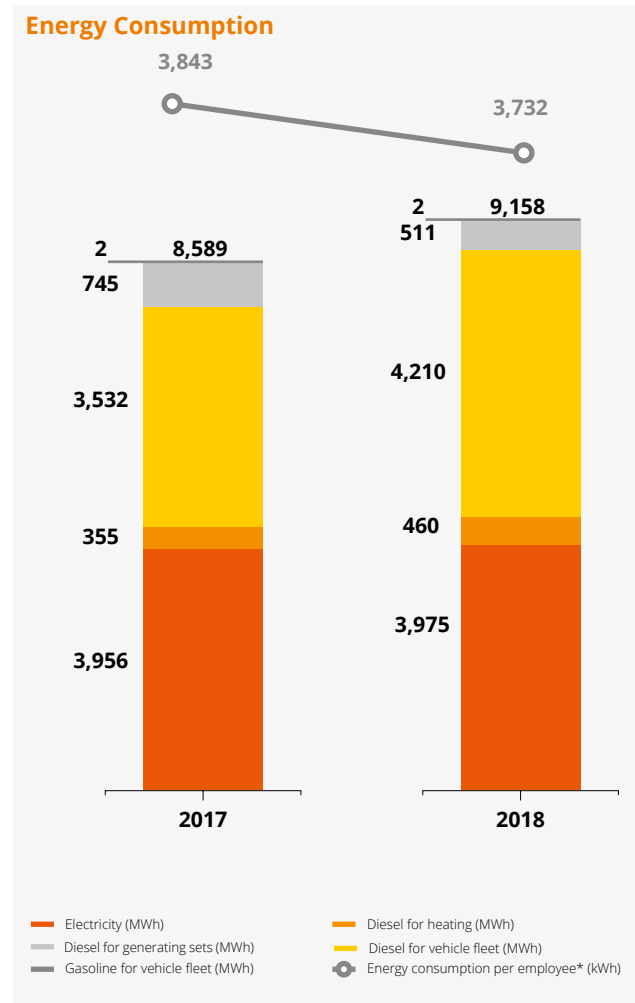
Recognizing the risks and opportunities associated with climate change, we seek to reduce our energy consumption and improve overall energy efficiency.

To achieve this objective, we identify the sources we can apply targeted initiatives to reduce our environmental footprint. Furthermore, we systematically quantify direct and indirect greenhouse gas emissions from our operations, which primarily result from electricity consumption in our buildings and secondarily from fuel consumption for heating and our vehicle fleet.

Energy consumption	2017	2018
Diesel for vehicle fleet (lt)	352,006	419,579
Gasoline for vehicle fleet (lt)	81,763	56,132
Diesel for heating (lt)	35,357	45,881
Diesel for generating sets (lt)	180	180
Electricity (kWh)*	3,955,805	3,974,611

**Data refer to all our buildings in Athens and Thessaloniki; these buildings are commonly used by OPAP S.A., Hellenic Lotteries S.A., OPAP Services S.A., Tora Direct S.A. and Tora Wallet S.A. The data do not include the consumption of Horse Races S.A.*

In 2018, although our energy consumption was increased, energy consumption per employee was decreased. This reflects OPAP's commitment to minimize its environmental footprint and promote sustainable growth.



To drive improvement on our climate change impact, we continued to engage into actions and programs aiming to further improve our environmental performance within 2018, mainly through the following initiatives:

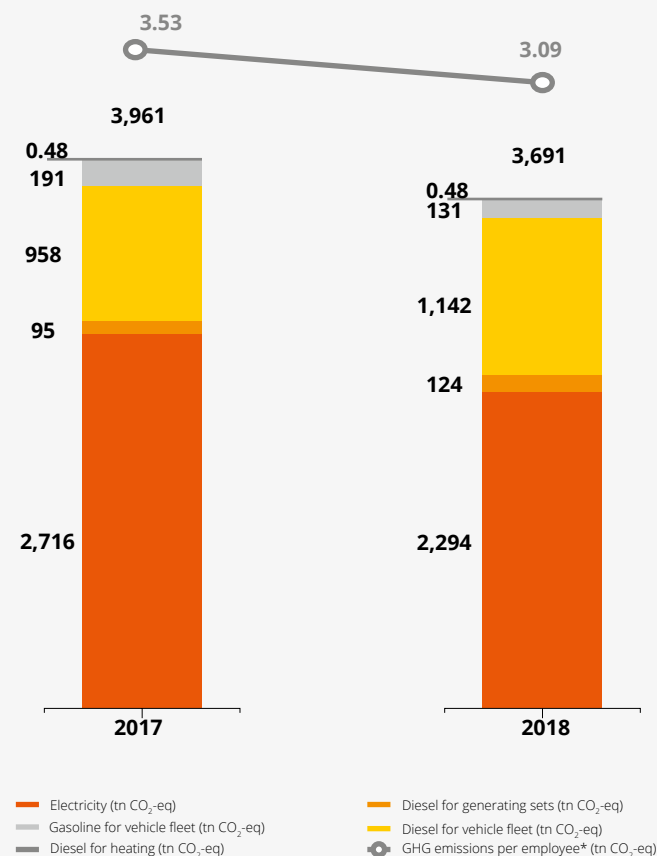
- Acquired **23 new Euro 6.2 cars** which is approximately 8% of our total fleet (leased and owned vehicles).
- Trained **134 new employees** on environmental and occupational health and safety issues through 7 corporate induction sessions.
- Included **six articles** in relation to environmental issues in our corporate newsletter.
- Conducted **two e-learning sessions** regarding occupational health and safety and environmental issues, with **684** and **110** participants respectively.
- Implemented an integrated **energy management software**, as well as **energy consumption meters** to improve energy monitoring and consumption.
- Installed **motion detectors** in kitchens and meeting rooms to reduce energy consumption and minimize maintenance costs.
- Installed **LED lighting units** at staircase areas to reduce energy consumption and minimize maintenance costs.
- Installed **solar panels** to produce hot water and minimize our energy consumption and environmental footprint.

Emissions

We calculate our greenhouse gas (GHG) emissions, using the best available data. We use the emission coefficients of the Greenhouse Gas Protocol to calculate the emissions deriving from the consumption of gasoline for vehicles and diesel for heating, vehicles and generating sets.

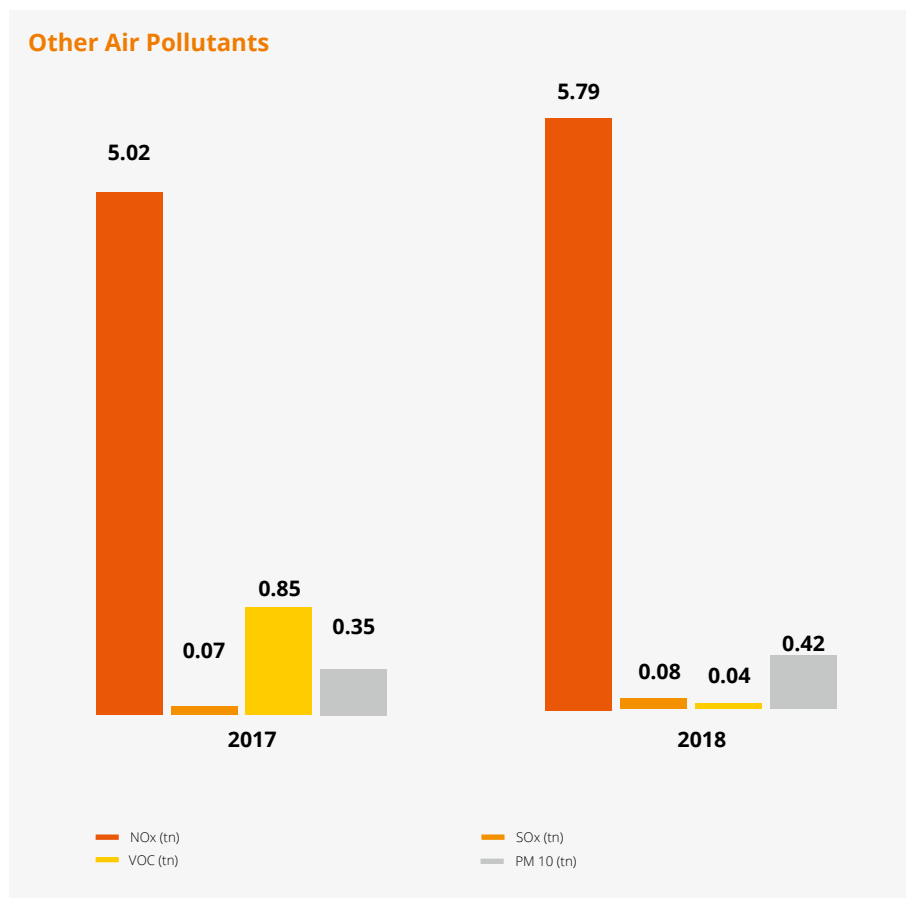
The emissions from electricity consumption are calculated based on Eurostat's data for national gross electricity production and the data from the national reports submitted to the Secretariat of the United Nations Framework Convention on Climate Change (UNFCCC). Conversion factors for CH₄ and N₂O emissions are based on the global warming potential values over a 100-year period as described by the UNFCCC.

GHG Emissions



Air Pollutants

Operating in a non-energy intensive industry, our impact related to other greenhouse gas emissions (NOx, SOx, VOC, PM10) is limited. However, we recognize the importance of this issue at a global scale and we therefore monitor our respective impact through our direct energy consumption.



Paper Consumption

In our efforts to reduce the amount of paper we use, we monitor and report on our paper consumption, based on our purchasing records. In 2018, we consumed around 16 tons of paper. OPAP S.A.'s consumption was reduced by almost 8% within the last year.

At the beginning of 2018, we initiated the "Zero Paper" project across OPAP S.A. The objective of the project was to substantially decrease paper consumption by fully exploiting existing digital solutions and improving defected digital processes. From the outset, the project's results were promising, and therefore we decided to broaden the project's scope by including additional objectives, focusing on utilizing the project's results as input for the company's digital strategy and introducing a new continuous way of thinking across the company. The implementation of the project offered additional benefits to the company by reducing costs and processing time.

Life-cycle Management of Hazardous Materials

We recognize the importance of protecting natural resources and therefore operate in a responsible manner, striving to reduce waste and increase our efficiency.

Consequently, we:

- Monitor the use of materials.
- Reduce the use of materials.
- Reuse materials.
- Recycle materials through licensed sub-contractors.
- Properly dispose hazardous materials.

Recycling performance

Material	2017	2018
Paper (coupons, playslips, thermal rolls) (kg)	24,840	144,862
Office paper (kg)	10,241	10,525
Cartridges – toners (units)	341	434
Light bulbs (units)	440	1,039
IT hardware and equipment (computers, printers etc.) (units)	1,573	26,175
Furniture (units)	14	52
Domestic batteries (kg)	90	127
Plastic (kg)	40	177
Aluminum (kg)	15	76

In 2018, following our technology transformation program, we replaced a large number of IT hardware and equipment both in our premises and network. Consequently, we replaced the paper material (coupons, playslips, thermal rolls) used in our network, and collected the outdated material for recycling.

There was an extensive effort to improve efficiency of recycling programmes for domestic batteries and plastics in Thessaloniki. Thus, we managed to increase the total quantities recycled compared to 2017. Moreover, the aluminium recycling initiative, running for the first time all year round, resulted in positive recycling rates.

We perform a number of actions aiming at improving our waste management performance, as outlined below.

- Recycling programs focusing on the collection of paper, cartridges – toners, light bulbs, domestic batteries, aluminum and plastic caps from beverages, and bottled water are implemented by placing appropriate bins in our facilities, as well as marked bins for the collection of organic waste (e.g. food residues) and food packaging.
- All potentially hazardous waste (i.e. toners, electrical equipment, light bulbs and domestic batteries) is appropriately discharged through licensed contractors.
- A licensed recycling partner directly delivers our recyclable waste to specialized recycling management facilities, instead of municipal recycling bins.
- Appropriate bins for aluminum are placed in kitchens and office areas.
- Appropriate labelling is used for separation of waste by employees.
- All used cartridges-toners (434 units) were sent for recycling.
- All plastic cutlery, spoons and straws were replaced with biodegradable ones.
- The plastic stirrers were replaced by wooden ones.

Other Environmental Impacts

Water consumption

Water shortage in many regions and countries around the world is an issue, which requires urgent action. Being conscious of the increasing pressure to contribute towards alleviating water scarcity, our responsible approach has led us to:

- Install water gauges in key areas of our facilities (buildings, gardens) to monitor and reduce water consumption.
- Control and ensure that no significant water leakages or discharges occurred during 2018.

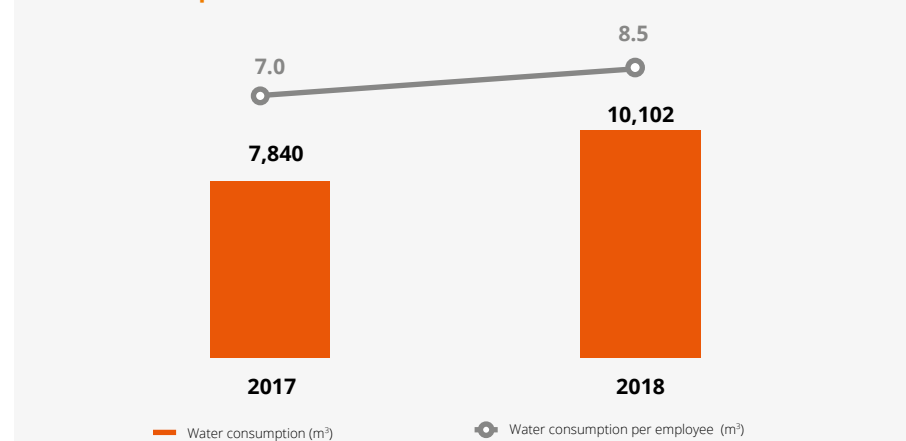
Refrigerants

Acknowledging that refrigerants have a detrimental effect on the ozone layer and damage our environment, we use only environmental-friendly refrigerants in our air-conditioning systems. In 2018, no additional refrigerants were added.

Biodiversity

We are aware of the alarming rate of biodiversity loss that has taken place over the last decades, due to unsustainable human-induced activities, and we acknowledge that our lives largely depend on the variety of species and ecosystems found on our planet. Taking this important environmental issue into consideration, we are proud to report that all our offices and buildings are located within urban environment without any adjacent protected areas and, therefore, are not subject to any specific biodiversity protection regulations and safeguarding measures.

Water Consumption



*Data refer to all our buildings in Athens and Thessaloniki; these buildings are commonly used by OPAP S.A., Hellenic Lotteries S.A., OPAP Services S.A., Tora Direct S.A. and Tora Wallet S.A. The data do not include the consumption of Horse Races S.A.

Environmental guidelines for our network

In our effort to engage with our stores and subsequently protect the environment and ensure a sustainable business operation, we introduce our network to sound environmental operations by including specific recommendations in our store development guidelines. These recommendations include actions such as:

- Replacement of old lighting units with new LED lighting units.
- Rational use of lights and electrical equipment.
- Use of high energy efficiency equipment.
- Recycling of materials (paper, plastic, batteries, TVs, electrical equipment etc.).

G.Appendix

IN THIS SECTION

1. About this Report
2. Performance in 2018 and 2019 Targets
3. GRI Content Index
4. Independent Auditor's Report
5. Abbreviations

G.1 About this Report

This is OPAP's 3rd Integrated Report. The report covers the financial year from January 1 to December 31, 2018 (unless is indicated otherwise). Our Integrated Report aims to provide a balanced and integrated depiction of OPAP's value creation process using both financial and non-financial material.

This report covers all activities (i.e. design, development, organization, operation, handling and management for Numerical Lotteries, Sports Betting games, Horseracing Mutual betting, Passive and Instant Lotteries, and VLTs, as well as support services) of OPAP Group Companies operating in Greece, namely OPAP S.A. and its subsidiaries (i.e. Hellenic Lotteries S.A., OPAP Services S.A., Tora Direct S.A., Horse Races S.A. and Tora Wallet S.A.). OPAP Cyprus LTD, OPAP Sports LTD, OPAP International LTD, OPAP Investment LTD and Neurosoft S.A. are included in the financial results and certain sections of the report as indicated respectively. TCB Holdings LCD is only included in the financial results.

There are no significant changes from previous reporting period in the scope, boundary or measurement methods applied in the Report.

This year's report has been restructured in line with the guidelines provided by the International Integrated Reporting Council's <IR> Framework. The social and environmental data and information included in this report have been prepared according to the new Global Reporting Initiative's Sustainability Reporting Guidelines (i.e. GRI Standards).

The separate and consolidated Financial Statements of OPAP have been prepared in accordance with International Financial Reporting Standards (IFRS) as issued by the International Accounting Standards Board (IASB) and interpretations issued by the IFRS Interpretations Committee, as adopted by the European Union and are effective as of 1 January 2018.

The Report has been developed in collaboration with [KKS Advisors](#).

In our continuous effort to improve our integrated reporting process and ensure that we follow the best practice reporting standards and meet the expectations of our stakeholders, we encourage you to forward your comments, thoughts, remarks or proposals regarding the 2018 Integrated Report to:

Mrs Georgia Lassanianou

Corporate Responsibility and Public Relations Director

OPAP S.A.

112 Athinon Av., 104 42, Athens, Greece

E-mail: g.lassanianou@opap.gr

G.2 Performance in 2018 and 2019 Targets

Depicted below are the performance targets set for 2018 and 2019. The 2018 targets also include an index illustrating the status of their attainment as well the relevant report section pertaining to each target.

OUR GAMES PORTFOLIO

2018 Targets	2018 Performance
Launch the new Pamestoixima.gr platform	● See section C.3.2 Betting Games
Launch new versions of LAIKO and ETHNIKO Lotteries	● See section C.3.4 Passive and Instant Lotteries
Launch 50 new PLAY Games	● See section C.3.5 Video Lottery Terminals
Enrich existing product offerings in KINO, VLTs and Virtuals	● See sections C.3.2 Betting Games, C.3.3 Numerical Lottery Games and C.3.5 Video Lottery Terminals
Index key: ● Achieved, ● In progress, ● Not achieved	
2019 Targets	
Launch TZOKER online.	
Expand KINO offering through SSBTs.	
Intensify our efforts in order to broaden our online portfolio.	

OPERATING RESPONSIBLY

2018 Targets	2018 Performance
Successfully maintain the certifications for our Management Systems	● See section E.3.2 Integrated Management System
Finalize the approved Internal Rules and Regulations	● See section E.3.1 Compliance
Implement a compliance module for our reporting needs/obligations	● See section E.3.1 Compliance
Remain actively engaged with our partners in international industry associations	● See sections C.1.3 Memberships, E.5 Stakeholder Engagement and F.2.1 Responsible Gaming
Achieve Post Contact Satisfaction Index of 85% from agents	● See section E.6 Customer Satisfaction
Achieve Post Contact Satisfaction Index of 70% from players	● See section E.6 Customer Satisfaction
Achieve First Contact Resolution of 77% from agents	● See section E.6 Customer Satisfaction
Achieve First Contact Resolution of 70% from players	● See section E.6 Customer Satisfaction
Achieve Abandoned Call Rate (ACR) of 5%	● See section E.6 Customer Satisfaction
Increase Service Level (calls answered in 30") at 80%	● See section E.6 Customer Satisfaction
Launch new satisfaction surveys to gain additional customer insights	● See section E.6 Customer Satisfaction
Develop and launch additional surveys to cover the majority of our touch-point mapping	● See section E.6 Customer Satisfaction
Enable proper one to one communication and data handling opt-in for over 60% of registered customers	● The target has been achieved for both online and Play games customers.
Launch the "Adopt a shop" program for all employees	● See section E.6 Customer Satisfaction
Achieve at least 27% overall customer satisfaction	● 26 % of our customers stated that their customer experience was better than they expected.
Achieve 62% of population to perceive OPAP as an entertainment company	● See section E.6 Customer Satisfaction
Inform the general public on our games and procedures through the "mathetonopap.gr" initiative and a winners' awareness campaign	● See section E.6 Customer Satisfaction
Implement our "60 years" Anniversary Program	● See section E.6 Customer Satisfaction
Implement our World Cup campaign	● See section E.6 Customer Satisfaction
Index key: ● Achieved, ● In progress, ● Not achieved	
2019 Targets	
Aim for 27 % of our surveyed customers to state that their customer experience was better than what they expected.	
Achieve 95% visitation rate per quarter among eligible employees, within the "Adopt a shop" program.	
Aim for 65% of the surveyed population to believe that OPAP guarantees right operation of games.	

PROTECTING OUR PLAYERS

2018 Targets	2018 Performance	
Obtain 4th Level WLA certification regarding Responsible Gaming for OPAP	●	<i>See section F.2.1 Responsible Gaming</i>
Obtain the Level WLA certification regarding Responsible Gaming for Hellenic Lotteries	●	<i>See section F.2.1 Responsible Gaming</i>
Participate in the KCOOS+ project through our EL/WLA/GLMS membership (2018-2020)	●	<i>See section F.2.1 Responsible Gaming</i>
Refresh the e-learning training courses on Responsible Gaming for employees and agents	●	<i>See section F.2.1 Responsible Gaming</i>
Audit the alignment of our Responsible Gaming practices with European Responsible Gaming Standards	●	<i>See section F.2.1 Responsible Gaming</i>
Revise Responsible Gaming content in our Induction program	●	<i>See section F.2.1 Responsible Gaming</i>
Continue our educational intervention program “Youth Power”	●	<i>See section F.2.1 Responsible Gaming</i>
Complete all necessary actions regarding enforcement of the new General Data Protection Regulation (GDPR) rules	●	<i>See section F.2.2 Draw credibility and data security</i>
Index key: ● Achieved, ● In progress, ● Not achieved		
2019 Targets		
Strengthen the communication strategy of Responsible Gaming to ensure players understand how to play responsibly.		
Empower agents to detect and handle problematic playing behavior.		
Optimize the access to referral and treatment for players exhibiting mental and psychological problems.		
Maintain high Responsible Gaming standards in everything we do.		

ENHANCING OUR NETWORK

2018 Targets	2018 Performance
Complete our technology transformation project (with installation of over 9,000 new Apollo terminals and over 12,000 Digital Signage players in the network)	● As of 31/12/2018 every OPAP store operated with at least two Apollo terminals. <i>See section F.3.1 Investment and Transformation</i>
Continue VLTs and Self Service Betting Terminals rollout installing over 7,000 machines for each one in OPAP agencies	● <i>See section F.3.1 Investment and Transformation</i>
Certify over one third of our network for TORA services	● <i>See section F.3.1 Investment and Transformation</i>
Support the Go to Market of new product launches in our network and launch PAME STOIXIMA online, assuring 50% of new customer registrations come from the retail network	● <i>See section F.3.2 Supporting our Network</i>
Launch an agents' benefits program with central agreements and certified partnerships to support agents in OPEX reduction, store construction and other services	● <i>See section F.3.2 Supporting our Network</i>
Introduce Retail Excellence (REX) 2020 strategy to the network aiming to deliver the optimal customer experience. Develop more than 400 new OPAP stores according to the REX 2020 standards.	● <i>See section F.3.1 Investment and Transformation</i>
Launch a new over-the-counter (OTC) platform	● <i>See section F.3.1 Investment and Transformation</i>
Install additional SSBTs in our agencies network, reaching at least 4,000 by end of the year.	● <i>See section F.3.1 Investment and Transformation</i>
Migrate INTRALOT Lottery and Hellenic Lotteries games to new terminal	● <i>See section F.3.1 Investment and Transformation</i>
Review the operating model for horse racing	● <i>See section F.3.1 Investment and Transformation</i>
Launch of Tora Wallet services, including pre-paid card and IBAN account	● <i>See section F.3.1 Investment and Transformation</i>
Introduce an agents' and agency employees 2-level training and certification program to have over 600 agencies with certified personnel	● <i>See section F.3.3 Training our Sales Agents</i>
Initiate a new Prototylo agency	● <i>See section F.3.1 Investment and Transformation</i>
Develop new organizational structure of front liners to achieve better support and agents' management	● <i>See section F.3.2 Supporting our Network</i>
Continue performance management with performance bonus schemes in 2018	● <i>See section F.3.2 Supporting our Network</i>
Launch a Network Performance Management Program for Gaming Halls	● <i>See section F.3.2 Supporting our Network</i>
Launch an advanced training program for PLAY Gaming Halls operators and employees	● <i>See section F.3.2 Supporting our Network</i>
Introduce a Personal Assistance and Partner Support Program for PLAY Gaming Halls	● In 2018, OPAP introduced a Personal Assistance and Partner Support Program for its Play stores. Through this program each OPAP Play team were assigned their own personal support consultant.
Introduce paperless registration process for players in PLAY Gaming Halls	● <i>See section F.3.1 Investment and Transformation</i>

Index key: ● Achieved, ● In progress, ● Not achieved

2019 Targets

Complete VLTs rollout & add 1,500 Self Service Betting Terminals along with the optimization of the setup/allocation in existing OPAP stores.

Continue our network development with 300 new OPAP stores and 150 OPAP store renovations.

Continue to develop our network, aiming at certifying 800 OPAP stores according to REX 2020 standards

Secure OPAP stores network compliance on commercial standards (85%) measured across all KPIs.

Enhance OPAP agents' overall satisfaction (80%).

Continue and evolve performance management with performance bonus schemes in 2019 for OPAP stores and Play network.

Launch an e-learning training platform for Play store partners.

Complete Play game machines roll-out.

Enhance Play stores visibility with the opening of facades across the network.

Launch Play games JACKPOT at OPAP stores and Play network.

DEVELOPING OUR PEOPLE

2018 Targets	2018 Performance	
Develop a high-performing team, through our new performance management, development and reward schemes	●	<i>See section F.4.1 Attract and Engage</i>
Achieve higher employee engagement in our annual Employee Survey	●	<i>See section F.4.1 Attract and Engage</i>
Conduct at least 2 evacuation exercises at our premises	●	<i>See section F.4.3 Health and Safety</i>
Further strengthen Top Management visibility	●	<i>See section F.4.1 Attract and Engage</i>
Embed our Cores Values in everyday life and promote work-life balance	●	<i>See sections F.4.1 Attract and Engage and F.4.2 Equality and Fairness</i>
Leverage new technologies for human resources management, through new modules in our PeopleOnline platform	●	<i>See section F.4.1 Attract and Engage</i>
Generate and implement Individual Development Plans for all our People	●	<i>See section F.4.4 Training and Development</i>
Index key: ● Achieved, ● In progress, ● Not achieved		
2019 Targets		
Optimize human resources' services, following best practices and technological advancements.		
Continue developing individual development plans via Opapacademy actions, classroom trainings, online development centers and teambuilding.		
Enrich Internal career opportunities and continue the internship program.		
Strengthen the effectiveness of internal communications channels and launch more wellness activations.		

SUPPORTING OUR SOCIETY

2018 Targets	2018 Performance
Complete the renovation of the ground floor Daily Care Unit (DCU) and the Central Sterile Service Department at the Children's Hospital "Aghia Sophia"	● See section F.5.1 Responsible Donations and Sponsoring
Complete the renovation of the first-floor (Wing A) 2nd Paediatric Nursing Unit of the Children's Hospital "Panagioti & Aglaïas Kyriakou"	● See section F.5.1 Responsible Donations and Sponsoring
Implement the "Wishing Ornaments" initiative	● See section F.5.1 Responsible Donations and Sponsoring
Launch our new societal support program to address local communities' needs	● See section F.5.1 Responsible Donations and Sponsoring
Organize 10 Sports Academies Festivals across Greece	● See section F.5.1 Responsible Donations and Sponsoring
Extend our "OPAP Forward" program for 21 additional companies	● See section F.5.1 Responsible Donations and Sponsoring
Launch and communicate our Supplier Code of Conduct	● See section F.5.2 Responsible Procurement
Conduct the annual environmental evaluation to 100% of suppliers with an annual spending of over €50,000 and potential negative environmental impacts	● See section F.5.2 Responsible Procurement
Introduce the "Zero Paper" initiative	● See section F.5.3 Environmental Impact
Forward 100% of discharged domestic and industrial batteries to licensed sub-contractors for recycling	● All discharged domestic and industrial batteries were sent to licensed sub-contractors for recycling. See section F.5.3 Environmental Impact
Forward 100% of discharged toners and cartridges to licensed sub-contractors for recycling	● See section F.5.3 Environmental Impact
Ensure energy management law compliance, through a certified Management System	● See section F.5.3 Environmental Impact
Index key: ● Achieved, ● In progress, ● Not achieved	
2019 Targets	
Complete the renovation of the 4th floor at the "Aghia Sophia" Children's Hospital.	
Complete the renovation of the 2nd floor (Wing A) at the "Panagioti & Aglaïas Kyriakou" Children's Hospital.	
Implement the "Wishing Ornaments" initiative online and offline for all people across Greece.	
Organize 10 Sports Academies Festivals across Greece.	
Realize at least 3 OPEN Sport Academies festivals, accessible for all people.	
Recruit more SMEs in "OPAP Forward" program with the objective of creating a team of 50 SMEs.	
Continue to implement OPAP's recycling programs.	
Maintain energy and environmental certifications, exhibiting zero non-conformances.	
Ensure that at least 20% of personnel are exposed to environmental awareness initiatives, such as classroom trainings, e-Learning courses or monthly newsletters on environmental matters.	

G.3 GRI Content Index

OPAP's 2018 Integrated Report has been prepared in accordance with the GRI standards at "core" level.

GRI Standards	Disclosure	Section / Comments
GRI 101 Foundation 2016		
General Disclosures		
	Organizational Profile	
	102-1 Name of the organization	<i>See sections C.1 Our Company and G.1 About this Report</i>
	102-2 Activities, brands, products, and services	<i>See section C3. Our Games Portfolio</i>
	102-3 Location of headquarters	<i>See sections C.1 Our Company and G.1 About this Report</i>
	102-4 Location of operations	<i>See section C.1 Our Company</i>
	102-5 Ownership and legal form	<i>See section C.1 Our Company</i>
	102-6 Markets served	<i>See sections C.1 Our Company and C3. Our Games Portfolio</i>
GRI 102 General Disclosures 2016	102-7 Scale of the organization	<i>See sections B. At a Glance, F.1.1 Financial Results, F.3.1 Investment and Transformation and F.4.1 Attract and Engage</i>
	102-8 Information on employees and other workers	<i>See section F.4.1 Attract and Engage</i>
	102-9 Supply chain	<i>See sections E.1 Business Model and F.5.2 Responsible Procurement</i>
	102-10 Significant changes to the organization and its supply chain	<i>See section C.1 Our Company</i>
	102-11 Precautionary Principle or approach	<i>See sections E.3 Operating Responsibly, Risk Management and F.5.3 Environmental Impact</i>
	102-12 External initiatives	<i>See sections F.2.1 Responsible Gaming, F.4.2 Equality and Fairness and G.1 About this Report</i>
	102-13 Membership of associations	<i>See section C.1.3 Memberships</i>

GRI Standards	Disclosure	Section / Comments
GRI 102 General Disclosures 2016	Strategy	
	102-14 Statement from senior decision-maker	See section A. Messages from the Chairman and the CEO
	Ethics and Integrity	
	102-16 Values, principles, standards, and norms of behavior	See sections E.1 Business Model and E.3.1 Compliance
	Governance	
	102-18 Governance structure	See section D.2 Governance and Leadership
	Stakeholder Engagement	
	102-40 List of stakeholder groups	See section E.5 Stakeholder Engagement
	102-41 Collective bargaining agreements	See section F.4.2 Equality and Fairness
	102-42 Identifying and selecting stakeholders	See section E.5 Stakeholder Engagement
	102-43 Approach to stakeholder engagement	See section E.5 Stakeholder Engagement
	102-44 Key topics and concerns raised by stakeholders	See section E.5 Stakeholder Engagement
	Reporting Practice	
	102-45 Entities included in the consolidated financial statements	See sections C.1 Our Company, F.1.1 Financial Results, F.1.2 Financial Statements and G.1 About this Report
	102-46 Defining report content and topic Boundaries	See sections E.4 Risk Management and G.1 About this Report
	102-47 List of material topics	See sections E.4 Risk Management and G.3 GRI Content Index
	102-48 Restatements of information	See section G.1 About this Report
	102-49 Changes in reporting	See sections C.1 Our Company and G.1 About this Report
	102-50 Reporting period	See section G.1 About this Report
	102-51 Date of most recent report	See section G.1 About this Report
	102-52 Reporting cycle	See section G.1 About this Report
	102-53 Contact point for questions regarding the report	See section G.1 About this Report
	102-54 Claims of reporting in accordance with the GRI Standards	See section G.3 GRI Content Index
	102-55 GRI content index	See section G.3 GRI Content Index
	102-56 External assurance	See section G.1 About this Report and G.4 Independent Auditor's Report
Economic Performance		
GRI 201 Economic Performance 2016	201-1 Direct economic value generated and distributed	See section F.1 Achieving Financial Results

GRI Standards	Disclosure	Section / Comments
Market Presence		
GRI 202 Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage 202-2 Proportion of senior management hired from the local community	See section F.4.2 Equality and Fairness See section D.3.2 Meet our Executive Committee
Indirect Economic Impacts		
GRI 203 Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported 203-2 Significant indirect economic impacts	See sections F.1.3 Economic Value Generated and F.3.1 Investment and Transformation See sections E.2 How we Create Value, F.3.1 Investment and Transformation, F.4.1 Attract and Engage, F.5.1 Responsible Donations and Sponsoring and F.5.2 Responsible Procurement
Procurement Practices		
GRI 204 Procurement Practices 2016	204-1 Proportion of spending on local suppliers	See section F.5.2 Responsible Procurement
Material Issues: Anti-corruption and Money Laundering		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue occur within the company and its retail network. This issue can impact the company's reputation and financial performance. See section E.3 Operating Responsibly
GRI 205 Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures 205-3 Confirmed incidents of corruption and actions taken	See sections E.3.1 Compliance and E.3.3 Anti-Money Laundering See sections E.3.1 Compliance and E.3.3 Anti-Money Laundering
Material Issue: Anti-Competitive Compliance and Behavior		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue occur within the company. This issue can impact the company's reputation and financial performance. See section E.3.1 Compliance
GRI 206 Anti-competitive Behavior	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	See section E.3.1 Compliance
Materials		
GRI 301 Materials 2016	301-1 Materials used by weight or volume 301-2 Recycled input materials used	See section F.5.3 Environmental Impact See section F.5.3 Environmental Impact

GRI Standards	Disclosure	Section / Comments
Energy		
GRI 302 Energy 2016	302-1 Energy consumption within the organization	See section F.5.3 Environmental Impact
	302-2 Energy consumption outside of the organization	See section F.5.3 Environmental Impact
	302-3 Energy intensity	See section F.5.3 Environmental Impact
Water		
GRI 303 Water 2016	303-1 Water withdrawal by source	See section F.5.3 Environmental Impact
Biodiversity		
GRI 304 Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	See section F.5.3 Environmental Impact
Emissions		
GRI 305 Emissions 2016	305-1 Direct (Scope 1) GHG emissions	See section F.5.3 Environmental Impact
	305-2 Energy indirect (Scope 2) GHG emissions	See section F.5.3 Environmental Impact
	305-6 Emissions of ozone-depleting substances (ODS)	See section F.5.3 Environmental Impact
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	See section F.5.3 Environmental Impact
Effluents and waste		
GRI 306 Effluents and Waste 2016	306-2 Waste by type and disposal method	See section F.5.3 Environmental Impact
	306-3 Significant spills	See section F.5.3 Environmental Impact
	306-4 Transport of hazardous waste	See section F.5.3 Environmental Impact
Environmental Compliance		
GRI 307 Environmental Compliance 2016	307-1 Non-compliance with environmental laws and regulations	See section F.5.3 Environmental Impact
Material Issue: Supplier HSEQ Assessment and Practice		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary	The impacts of this issue occur in the company's supply chain and are directly linked to the company's operation via its relationship with suppliers.
	103-2 The management approach and its components	
	103-3 Evaluation of the management approach	
GRI 308 Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	See section F.5.2 Responsible Procurement
	308-2 Negative environmental impacts in the supply chain and actions taken	See section F.5.2 Responsible Procurement

GRI Standards	Disclosure	Section / Comments
GRI 414 Supplier Social Assessment	414-1 New suppliers that were screened using social criteria 414-2 Negative social impacts in the supply chain and actions taken	See section F.5.2 Responsible Procurement See section F.5.2 Responsible Procurement
Material Issue: Work Positions		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue occur within the company's workforce. The issue can impact the employees' performance and engagement and is directly linked to the company's human resources practices. See section F.4.1 Attract and Engage
GRI 401 Employment 2016	401-1 New employee hires and employee turnover 401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees 401-3 Parental leave	See section F.4.1 Attract and Engage See section F.4.1 Attract and Engage See section F.4.1 Attract and Engage
Labor/Management Relations		
GRI 402 Labor/Management Relations	402-1 Minimum notice periods regarding operational changes	See section F.4.2 Equality and Fairness
Occupational Health and Safety		
GRI 403 Occupational Health and Safety	403-2 Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities 403-3 Workers with high incidence or high risk of diseases related to their occupation	See section F.4.3 Health and Safety See section F.4.3 Health and Safety
Training and Education		
GRI 404 Training and Education 2016	404-1 Average hours of training per year per employee 404-2 Programs for upgrading employee skills and transition assistance programs 404-3 Percentage of employees receiving regular performance and career development reviews	See section F.4.4 Training and Development See section F.4.4 Training and Development See section F.4.4 Training and Development
Material Issue: Equality and Fairness		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue occur within the company's workforce. The issue can impact the employees' performance and engagement and is directly linked to the company's human resources practices. See sections F.4.1 Attract and Engage and F.4.2 Equality and Fairness
GRI 405 Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees 405-2 Ratio of basic salary and remuneration of women to men	See sections D.3 Members and Relevant Experience, F.4.1 Attract and Engage and F.4.2 Equality and Fairness See section F.4.2 Equality and Fairness
Non-discrimination		
GRI 406 Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	See section F.4.2 Equality and Fairness

GRI Standards	Disclosure	Section / Comments
Freedom of Association and Collective Bargaining		
GRI 407 Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	See section F.4.2 Equality and Fairness
Child Labor		
GRI 408 Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	See section F.4.2 Equality and Fairness
Forced or Compulsory Labor		
GRI 409 Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	See section F.4.2 Equality and Fairness
Human Rights Assessments		
GRI 412 Human Rights Assessments 2016	412-1 Operations that have been subject to human rights reviews or impact assessments	See section F.4.2 Equality and Fairness
Local Communities		
GRI 413 Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	See section F.5.1 Responsible Donations and Sponsoring
	413-2 Operations with significant actual and potential negative impacts on local communities	See section F.5.1 Responsible Donations and Sponsoring
Material Issue: Product and Service Labelling		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary	The impacts of this issue occur at the company's retail network. The issue can induce problematic behavior and is directly linked to the company's products and services. See section F.2.1 Responsible Gaming
	103-2 The management approach and its components	
	103-3 Evaluation of the management approach	
	417-1 Requirements for product and service information and labelling	See section F.2.1 Responsible Gaming
	417-2 Incidents of non-compliance concerning product and service information and labelling	See section F.2.1 Responsible Gaming
GRI 417 Marketing and Labelling 2016	417-3 Incidents of non-compliance concerning marketing communications	See section F.2.1 Responsible Gaming

GRI Standards	Disclosure	Section / Comments
Material Issues: Customer Privacy		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue affect the company's customers. The issue can impact the company's reputation and is directly linked to the company's business practices. See section F.2.2 Draw Credibility and Data Security
GRI 418 Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	See section F.2.2 Draw Credibility and Data Security
Material Issue: Responsible Gaming		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue affect the company's customers. The issue can induce problematic behavior and is directly linked to the company's products and services. See section F.2.1 Responsible Gaming
Material Issue: Responsible Communication		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue occur between the company and its stakeholders. The issue can impact the company's reputation and is directly linked to its business relationships. See section F.2.1 Responsible Gaming
Material Issue: Customer Satisfaction		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue occur between the company and its customers. The issue can impact the company's reputation and financial performance and is directly linked to its business relationships. See section E.6 Customer Satisfaction
Material Issue: Network Compliance		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue occur within the company's retail network. The issue can impact the company's reputation and is directly linked to its business relationships with its retail network. See sections E.3.3 Anti-money Laundering, E.3.4 Addressing Illegal Gaming and F.2.1 Responsible Gaming
Material Issue: Internet and Data Safety		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue affect the company's customers. The issue can impact the company's reputation and is directly linked to the company's security practices. See section F.2.2 Draw Credibility and Data Security

GRI Standards	Disclosure	Section / Comments
Material Issue: Donation and Support		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue occur within the society in which the company operates. The issue can impact the company's reputation and is directly linked to its corporate responsibility practices. <i>F.5.1 Responsible Donations and Sponsoring</i>
Material Issue: Public Involvement		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue occur between the company and its stakeholders. The issue is directly linked to the company's business relationships and engagement practices. <i>See section E.5 Stakeholder Engagement</i>
Material Issue: Corporate Governance		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue occur within the company. The issue can impact the company's financial performance and is directly linked to its governance practices and principles. <i>See section D. Corporate Governance</i>
Material Issue: Code Compliance		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue occur within the company. This issue can impact the company's reputation and financial performance. <i>See section E.3.1 Compliance</i>
Material Issue: Economic Transparency		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue occur within the company. The issue can impact the company's financial performance and is directly linked to its business practices. <i>See sections F.1.1 Financial Results and F.1.2 Financial Statements</i>
Material Issue: Corporate Responsibility		
GRI 103 Management Approach 2016	103-1 Explanation of the material topic and its boundary 103-2 The management approach and its components 103-3 Evaluation of the management approach	The impacts of this issue occur within the company. This issue can impact the company's reputation and financial performance. <i>See section E.1 Business Model</i>

G.4 Independent Auditor's Report (Translated from the original in Greek)

To the Shareholders of

GREEK ORGANIZATION OF FOOTBALL PROGNOSTICS S.A.

Report on the Audit of the Separate and Consolidated Financial Statements

Opinion

We have audited the accompanying Separate and Consolidated Financial Statements of GREEK ORGANIZATION OF FOOTBALL PROGNOSTICS S.A. (the "Company") which comprise the Separate and Consolidated Statement of Financial Position as at 31 December 2018, the Separate and Consolidated Statements of Profit or Loss and Comprehensive Income, Changes in Equity and Cash Flows for the year then ended, and notes, comprising a summary of significant accounting policies and other explanatory information.

In our opinion, the accompanying Separate and Consolidated Financial Statements present fairly, in all material respects, the financial position of GREEK ORGANIZATION OF FOOTBALL PROGNOSTICS S.A. and its subsidiaries (the "Group") as at 31 December 2018 and its financial performance and its cash flows for the year then ended, in accordance with International Financial Reporting Standards as adopted by the European Union.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISA), which have been incorporated in Greek legislation. Our responsibilities under those standards are further described in the Auditors' Responsibilities for the Audit of the Separate and Consolidated Financial Statements section of our report. We are independent of the Company and its consolidated subsidiaries in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants, as it has been incorporated into Greek legislation, and the ethical requirements that are relevant to the audit of the separate and consolidated financial statements in Greece and we have fulfilled our ethical responsibilities in accordance with the requirements of the applicable legislation and the aforementioned Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the Separate and Consolidated Financial Statements of the current period. These matters and the relevant significant assessed risks of material misstatement were addressed in the context of our audit of the Separate and Consolidated Financial Statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

1. REVENUE RECOGNITION – GROSS GAMING REVENUE

Refer to significant accounting policies note 8.4 Revenue Recognition

Key audit matter

The revenue streams of the Group and the Company are computed on highly complex IT systems, with a number of different bases for calculating revenue, which are largely based on automated processes in regulated environments. There is a huge number of transactions each year, all requiring a correct IT outcome which is dependent mainly on the service organizations which have developed specific IT platforms for this purpose. There is a risk that each system is not configured correctly from the outset such that revenue is calculated incorrectly, that the systems do not interface correctly from the customer facing systems through to the financial information systems and that unauthorized changes are made to any of these systems. Revenues are the basis for the calculations of commission expenses and various liabilities related to games.

Due to the quantum of the revenue from each stream and associated systems and processes, the recognition of revenue for the games was deemed a key audit matter.

How the matter was addressed in our audit

Our audit procedures in relation to this matter included, amongst others the receipt and review of ISAE 3402 Reports on the description, design and operating effectiveness of controls at the service organizations which have been issued by the auditors of the service organizations providing services to the Group and Company through certain IT platforms and the performance of complementary controls at the Group and Company in these service organizations. Furthermore, IT audit specialists assisted the Group audit team in assessing the effectiveness of the controls in place in relation to the IT systems and additionally performing audit procedures to test the accuracy of the revenue processed by these systems. We also performed substantive analytical procedures over the significant revenue streams and we tested the year end income cut off on a sample basis.

2. IMPAIRMENT ON INTANGIBLE ASSETS AND GOODWILL

Refer to significant accounting policies note 8.8 Impairment of non-financial assets and 12.1 Intangible assets and 12.4 Goodwill

Key audit matter

The Group has intangible assets EUR 1 122 920 thousand and Goodwill of EUR 34 275 thousand. The Company has intangible assets of EUR 972 679.

At the end of each reporting period, the Group and the Company assess whether there is any indication that an asset may be impaired. If any such indication exists, the Group and the Company perform an impairment test in order to estimate the asset's recoverable amount. If the asset's recoverable amount is less than its carrying amount, the asset is written down with the difference recorded to the income statement. In addition, irrespective of whether there is any indication of impairment, the Company and the Group perform an impairment test for intangible assets that are not yet available for use, as well as for goodwill.

The impairment test is a complex process requiring significant management judgment and is based on key assumptions about future profitability and cash flows, selecting appropriate the discount and long-term growth rates.

Due to the subjectivity involved in the key assumptions used by management in the impairment review, the inherent uncertainty of those assumptions, as well as the significant balances of these accounts, the ultimate recoverability of goodwill, and intangible assets was considered as a key audit matter.

How the matter was addressed in our audit

Our audit procedures in relation to the impairment assessment of intangible assets and goodwill included, amongst others, the agreement of the future cash flows assumptions to Board-approved forecasts, the assessment of management's historical budgeting accuracy and the challenge of short-term growth rates used in the forecasts by reference to current performance and plans. We used our internal valuation specialists to independently calculate appropriate discount rates for comparison with those used by management. We carried out sensitivity analysis on management's assumptions to challenge the key assumptions, as well as to reflect reasonably possible alternative future scenarios. In addition we assessed the adequacy of the relevant disclosures in the financial statements.

3. IMPAIRMENT OF INVESTMENTS IN SUBSIDIARIES

Refer to notes 8.8 Impairment of non-financial assets and 12.5 Investment in Subsidiaries

Key audit matter	How the matter was addressed in our audit
<p>At 31 December 2018, the Company had investments in subsidiaries of EUR 270 725 thousand, which are accounted for at cost less impairment.</p> <p>If there is any indication that an asset may be impaired, the Company performs an impairment test in order to estimate the asset's recoverable amount. If the asset's recoverable amount is less than its carrying amount, the asset is written down with the difference recorded to the income statement.</p> <p>The impairment test is a complex process requiring significant management judgment and is based on key assumptions about future profitability and cash flows, taking into account the environment in which the Company's investments operate which are effected from the regulatory framework, selecting appropriate discount and long-term growth rates.</p> <p>Due to the subjectivity involved in the key assumptions used by management in the impairment review, and the inherent uncertainty of those assumptions, and the significant balance of the investment in subsidiaries in the Company's financial statements, the impairment of investments in subsidiaries was considered as a key audit matter.</p>	<p>Our audit procedures in relation to the impairment of investment in subsidiaries included, amongst others, the examination of whether there are indications of impairment for each investment in subsidiary. In the cases where an indication of impairment was required, when calculating the recoverable amount of the investments in subsidiaries, we tested the model used by the management for the calculation of the value in use and we agreed the future cash flows of the subsidiaries to Board-approved forecasts. We assessed management's historical budgeting accuracy and the challenge of short-term growth rates used in the forecasts of the Company by reference to current performance and plans. We used our internal valuation specialists to independently calculate appropriate discount rates for comparison with those used by management and compare with market. We carried out sensitivity analysis on management's assumptions to challenge the key assumptions, as well as to reflect reasonably possible alternative future scenarios. In addition we assessed the adequacy of the relevant disclosures in the financial statements.</p>

Other Information

Management is responsible for the other information. The other information comprises the information included in the Board of Directors' Report, for which reference is made in the "Report on Other Legal and Regulatory Requirements" and the Declarations of the Members of the Board of Directors included in the Annual Report as required by the L. 3556/2007 but does not include the Separate and Consolidated Financial Statements and our Auditors' Report thereon.

Our opinion on the Separate and Consolidated Financial Statements does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the Separate and Consolidated Financial Statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the Separate and Consolidated Financial Statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of Management and Those Charged with Governance for the Separate and Consolidated Financial Statements

Management is responsible for the preparation and fair presentation of the Separate and Consolidated Financial Statements in accordance with International Financial Reporting Standards as adopted by the European Union and for such internal control as Management determines is necessary to enable the preparation of separate and consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the Separate and Consolidated Financial Statements, management is responsible for assessing the Company's and the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Company and the Group or to cease operations, or has no realistic alternative but to do so.

The Audit Committee (article 44 of L.4449/2017) of the Company is responsible for overseeing the Company's and the Group's financial reporting process.

Auditors' Responsibilities for the Audit of the Separate and Consolidated Financial Statements

Our objectives are to obtain reasonable assurance about whether the Separate and Consolidated Financial Statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs which have been incorporated in Greek legislation will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these Separate and Consolidated Financial Statements.

As part of an audit in accordance with ISAs, which have been incorporated in Greek legislation, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the separate and consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's and the Group's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by Management.
- Conclude on the appropriateness of Management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's and the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the Separate and Consolidated Financial Statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Company and the Group to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the Separate and Consolidated Financial Statements, including the disclosures, and whether the separate and consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on these Consolidated Financial Statements. We are responsible for the direction, supervision and performance of the group audit. We remain solely responsible for our audit opinion.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the Separate and Consolidated Financial Statements of the current period and are therefore the key audit matters. We describe these matters in our auditors' report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

Report on Other Legal and Regulatory Requirements

1. Board of Directors' Report

Taking into consideration that Management is responsible for the preparation of the Board of Directors' Report and the Corporate Governance Statement that is included in this report pursuant to the provisions of paragraph 5 of Article 2 (part B) of Law 4336/2015, we note that:

- (a) The Board of Directors' Report includes a Corporate Governance Statement which provides the information set by Article 152 of L. 4548/2018.
- (b) In our opinion, the Board of Directors' Report has been prepared in accordance with the applicable legal requirements of Articles 150 and 153 and of paragraph 1 (cases c and d) of article 152 of L. 4548/2018 and its contents correspond with the accompanying Separate and Consolidated Financial Statements for the year ended 31 December 2018.
- (c) Based on the knowledge acquired during our audit, relating to the Company and its environment, we have not identified any material misstatements in the Board of Directors' Report.

2. Additional Report to the Audit Committee

Our audit opinion on the Separate and Consolidated Financial Statements is consistent with the Additional Report to the Audit Committee of the Company dated 21 March 2019, pursuant to the requirements of article 11 of the Regulation 537/2014 of the European Union (EU).

3. Provision of non-Audit Services

We have not provided to the Company and its subsidiaries any prohibited non-audit services referred to in article 5 par. 1 of Regulation (EU) 537/2014.

The permissible non-audit services that we have provided to the Company and its subsidiaries during the year ended 31 December 2018 are disclosed in Note 12.40 of the accompanying Separate and Consolidated Financial Statements.

4. Appointment of Auditor

We were appointed for the first time as Certified Auditors of the Company based on the decision of the Annual General Shareholders' Meeting dated 11 May 2011. From then onwards we were reappointed as Certified Auditors of the Company based on the decision of the Annual General Shareholders' Meeting dated

22 May 2014 and our appointment has been renewed uninterruptedly for a total period of 5 years based on the annual decisions of the General Shareholders' Meeting.

Athens, 27 March 2019

KPMG Certified Auditors AE

AM SOEL 114

Nikolaos Vouniseas, Certified Auditor Accountant

AM SOEL 18701

G.5 Abbreviations

Term	Refers to
AML	Anti-Money Laundering
B2B	Business-to-business
BoD	Board of Directors
CRM	Customer Relationship Management
CTF	Counter Terrorism Financing
EBITDA	Earnings Before Interest, Taxes Depreciations and Amortization
EL	European Lotteries
GDP	Gross Domestic Product
GDPR	General Data Protection Regulation
GGR	Gross Gaming Revenue: wagers minus prize payouts to winners
GHG	Greenhouse Gas Emissions
GLMS	Global Lottery Monitoring System
H2GC	H2 Gambling Capital – independent providers of gambling market data and estimates
HGC	Hellenic Gaming Commission
IFRS	International Financial Reporting Standards
IMS	Integrated Management System
IPS	Internet Service Provider
KETHEA	Therapy Center for Dependent Individuals
NGR	Net Gaming Revenue
SSBT	Self Service Betting Terminals
UNFCCC	United Nations Framework Convention on Climate Change
VLT	Video Lottery Terminals
WLA	World Lottery Association

