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POLICY ON GRANTING WINNINGS CERTIFICATES

OPAP S.A.

Submitted by:


Head of Compliance

Approved by:

C.E.O.


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Index of Amendments to the Policy on Granting Winnings Certificates

Version/Date of Approval	BoD Resolution Number	Description
1 st Version	1/22.01.2015 (item 7A)	Initial Version
2 nd Version	6/25.06.2015 (item 4)	Second Version
3 rd Version	Approved by the CEO	Third Version
4 th Version	Approved by the CEO	Fourth Version
5 th Version	Approved by the CEO	Fifth Version

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POLICY ON GRANTING WINNINGS CERTIFICATES

OPAP S.A., complying with decision no. **129/2/7-11-2014** of the Hellenic Gaming Commission (HGC), as amended and currently in force, grants a Certificate of winnings attributed during **the immediately preceding fiscal year**, for tax purposes, following an **online request** by the interested person/beneficiary, which is submitted **obligatorily once per year** within the subsequent fiscal year from the one the winnings were collected, until the 31st of October, and **only if the full personal details of the Player are certified and verified** in accordance with the aforementioned provisions. The deadline for the online request may be extended upon Company's decision, which is communicated through its website, www.opap.gr. In any case, the Winnings Certificate shall only be granted if the applicant, upon submitting the winning participation, met all the requirements for the participation in the games of OPAP S.A., as specified in the Specific Gaming Regulations.

It shall be noted that, according to the applicable regulatory framework, the Winnings Certificates issued from 2016 onwards will regard exclusively the winnings **of the immediately preceding fiscal year**, while no certificate may be granted for winnings paid during the fiscal years that preceded the immediately preceding fiscal year.

In particular, the following shall apply for the issuance of a Winnings Certificate per channel/platform of games of chance conduct through which the winnings were obtained:


A. WINNINGS CERTIFICATE FOR GAMES OF CHANCE CONDUCTED THROUGH AN INDIVIDUAL PLAYER CARD OR THROUGH AN ONLINE ACCOUNT

OPAP S.A. shall grant a Winnings Certificate following an **online request** by the Player, based on the total playing activity of the Player during the fiscal year that the Certificate regards, as it derives from the Player's online account, on the condition that the total gross profit following the deduction of the total betting amount is positive,, and after the certification and verification of the full details of the Player, in accordance with Annex II of the HGC Regulation (Annex to the present Policy).

The request shall be submitted within the subsequent fiscal year and the aforementioned deadline (October 31st), or within the eventual extension thereof which may be decided by the Company, at its own discretion, and communicated through its website, www.opap.gr, for the winnings of the immediately preceding fiscal year, via the following company website: www.pamestoixima.gr.

B. WINNINGS CERTIFICATE FOR LAND-BASED GAMES OF CHANCE

OPAP S.A. shall grant a Winnings Certificate following an **online request** by the Player, submitted within the subsequent fiscal year from the one the winnings were collected and until October 31st (unless the Company extends the aforementioned deadline through an

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announcement posted on its website, www.opap.gr) and after the certification and verification of the full details of the Player, in accordance with Annex II of the HGC Regulation (Annex to the present Policy).

For every online request, and based on the TIN of the applicant, all bank payments of the immediately preceding fiscal year will be automatically retrieved, as identified in the bank payment records of the Company. In case bank payments from all companies of the Group are identified, then the system will automatically create three requests and issue three different Winnings Certificates, one for OPAP S.A., one for HELLENIC LOTTERIES S.A. and one for Hellas Horse Races S.A. with all individual bank payments effected per company.


In the unlikely event that one or more bank payments of the immediately preceding fiscal year from that of the submission of the request is/are not retrieved via the aforementioned automatic process, then the applicant will have the possibility to introduce himself/herself the additional bank payments which did not appear automatically in the system, by entering the barcode of the winnings certificate receipt or the bank code printed on the bank receipt.

A Winnings Certificate may also be granted for winnings obtained by more than one beneficiaries, for those games where the collective submission of tickets is not supported, if the payment process specified by OPAP S.A. is observed. For the issuance of a Winnings Certificate, each co-beneficiary shall submit an online request, within the subsequent fiscal year from the one the winnings were collected, through the website: winningscertificates.opap.gr.

In any case, a Winnings Certificate shall be granted **only if the applicant, when submitting the winning participation, was over the minimum age of 18 years** (unless otherwise specified in the Regulatory Framework governing the games of OPAP S.A.). A Winnings Certificate shall not be issued for winnings obtained through the participation of the interested person while not meeting the above condition.


Granting a Winnings Certificate through the electronic system requires the following:

1. The creation of an individual online account in the following website: winningscertificates.opap.gr, through which the applicant may submit his/her request. The request shall obligatorily include the following details of the applicant: full name, father's name, TIN, ID number or Passport number and issuing country (and a valid residence permit for foreigners, coming from countries outside Schengen Area), date of birth, contact telephone numbers (landline and mobile), current home address, as well as details of the representative (e.g. lawyer, accountant, or other) if applicable: full name, capacity, telephone number, e-mail address and TIN.
2. The electronic attachment of the necessary documents for the certification and

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verification of the Player's details, in accordance with Annex II of the HGC Decision, namely: a) The latest tax return document of the applicant, and b) the Solemn Declaration of article 8 of L. 1599/1986, which will be automatically filled in with : his/her personal details, e-mail address and profession, as well as the details of his/her representative, if applicable and as they are filled in by the Player during the creation of the individual online account. The signature of the Player in the Solemn Declaration shall be authenticated by a competent authority.

3. In the case of co-beneficiaries, a separate online Winnings Certificate request shall be submitted by each co-beneficiary via website: winningscertificates.opap.gr.
4. In the event that there is a discrepancy between the details in the "Bank Payment Request", in which case the winnings are credited to the beneficiary's bank account, the Player may submit an online request for the issuance of a Winnings Certificate through website: winningscertificates.opap.gr.
5. The verification process of a Player's identity shall be repeated whenever there are doubts regarding the accuracy and completeness of the data provided.
6. If the details filled in the online request are proven to be false or inaccurate upon checking, or if it derives from the bank payments that the due processes regarding the participation, the games and the payments of the corresponding amounts were not observed, **the Winnings Certificate shall not be granted.**
7. For every online Winnings Certificate request approved by OPAP S.A., a link will be sent to the e-mail address of the applicant, who may, at his/her own discretion, transfer or save the Winnings Certificate on his/her personal computer.
8. OPAP S.A. reserves the right to reject a Winnings Certificate request, at its own discretion, in accordance with the applicable legislative and regulatory framework.


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ANNEX

CERTIFICATION AND VERIFICATION OF THE PLAYER'S IDENTITY AT THE TIME OF ISSUANCE OF A WINNINGS CERTIFICATE

The minimum information required for the certification of the identity of the Players at the time of issuance of Winnings Certificates, as well as the required documents for the verification of the aforementioned information, are, indicatively, the following:

DATA FOR THE CERTIFICATION OF THE PLAYER'S IDENTITY	INDICATIVE DOCUMENTATION FOR THE VERIFICATION OF THE PLAYER'S IDENTITY (INDIVIDUALLY OR JOINTLY, AS APPROPRIATE)
Full name and father's name	ID card or valid Passport Military or Police ID card
ID or Passport number and issuing authority	
Date and place of birth	
Current home address	Recent public utility bill
Contact phone details	Lease Agreement submitted to the tax authorities (Tax Office)
	Tax return document or other documents issued by the tax authorities (Tax Office)
	Valid residence permit
Profession	Employer's certification
	Tax return document or other documents issued by the tax authorities (Tax Office)
	Copy of recent salary bill
	Professional identity
	Insurance body document
Tax Identification Number (TIN)	Tax return document or other documents issued by the tax authorities (Tax Office)

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In case that the Player is a foreigner, the provisions of this Annex shall apply respectively for the certification of his/her identity. Any legal documents issued by the competent authorities of the Player's country of origin, including certificates or documents of the country's competent authorities, keeping relevant records and data, or other supporting documents in general, in accordance with the legislation of this country, can be accepted as certification documents. The Obligated Persons may request the translation of the required documents in order to understand their content.