



INTEGRATED **ANNUAL REPORT 2016**

OPAP.GR

CREATING VALUE
FOR OUR SHARED
FUTURE

Creating value for our shared future

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A. MESSAGES FROM
THE CHAIRMAN & THE CEO

Welcome
to our annual
integrated report

DEAR ALL,

I am pleased to present to you the company's first Integrated Report, following our previous eight Corporate Responsibility Reports. The report integrates financial and non-financial results for year 2016, further strengthening our relations and engagement with all our stakeholders and ensuring organizational transparency. It also outlines our commitment to firmly embed corporate responsibility into our business operations. I strongly believe that 2016 was a landmark year for OPAP, as we promoted significant changes at various levels, which allow us to build a strong future for our company. Despite operating in a challenging environment, we have taken major steps forward and set solid foundations for long-term success and growth. With hard work, persistence and our people's commitment, we managed to promote our priorities and initiate investments and projects that will create lasting value for the company, but also for the Greek economy and society.

Besides an important business development for our company, the unfreezing and roll-out of the VLTs project constitutes a decisive action against illegal gambling – a diachronic problem for Greece, which among others deprives important revenues for the State.

As a responsible Greek corporate citizen we support the society and sports, and implement an extensive CSR program. This past year we continued with our successful initiatives of the "OPAP Sports Academies" and the renovation of the two Pediatric Hospitals, benefiting the country's youth and the society as a whole. We are very proud of our achievements in this area. Being the leading gaming company in Greece comes with great responsibility, since our well-being as a business is linked with the well-being of the community. Responsible Gaming is a central element in our strategy that has brought significant results and has been recognized by the World Lottery Association, who rewarded to OPAP S.A. and Hellenic Lotteries S.A with Level 3 certification. Our efforts in this area continue steady and fast. In this context, the Integrated Report is an opportunity for us to share our philosophy with our stakeholders, while serving as a basis for dialogue on our future strategic planning. Our aim is this report to act as a tool for closely monitoring and recording our progress in the fields that are of material importance to OPAP, as well as for improving our overall economic, environmental and social performance.

This is one more of the steps we are taking, as part of our long-term focus on the sustainable growth of our company. We are aware that there is still much work to be done and that there are several challenges ahead. Nevertheless, we remain committed to demonstrating leadership both in terms of business performance and in terms of accountability and reporting. Despite the challenges, 2016 was a year in which we successfully set the foundations for a new chapter in our company's history. Therefore, I would like to express my appreciation to OPAP's people, not only for delivering on our business objectives, but moreover for doing so in a responsible way.

With this opportunity, I would also like to express our determination to strengthen our engagement with our stakeholders and continue being a benchmark of corporate responsibility within our business community. I would like to thank you for your continuous interest in our work; and I look forward to your support in our programs and initiatives.

Have a pleasant reading,

Kamil Ziegler
Executive Chairman



A. MESSAGES FROM
THE CHAIRMAN & THE CEO

DEAR STAKEHOLDER,

The publication of OPAP’s first Integrated Report coincides with arguably the most exciting and positive time in the company’s 59-year history.

I believe 2016 was a year of significant progress for OPAP, despite the ongoing difficulties in our operating environment. Overall, driven by our 2020 Vision and our Strategic Priorities that are the framework for everything we do within the company, we have achieved impressive results and our financial performance was aligned with our expectations.

We have already made tangible progress on each of our eight Strategic Priorities, remaining focused on our key objective of generating sustainable value for our shareholders, our people, our partners and stakeholders. Within this framework, we are implementing many projects and initiatives that will shape the immediate and the long-term future of our company.

In particular, we are making major progress towards building a world class portfolio of products and services, investing in our network as well as leveraging the latest technology capabilities and transforming the role of technology in our organization and network. We have also established OPAP’s own set of company Core Values which will drive the behaviour of every member of the OPAP Team. Together all of these activities are generating an unprecedented level of positive change for OPAP, which is key to the successful execution of our strategy.

Another significant element of our strategy is our commitment to the communities in which we operate. As part of our corporate responsibility initiatives, we continually assess and determine our priorities on the basis of actual social needs and our stakeholders’ expectations. We are incredibly proud that our achievements in this field are widely recognized. This gives us the incentive to continue working towards the same direction, with an enhanced level of engagement and sense of purpose.

In summary, our operational performance in 2016 was commendable and the year also heralded the start of the next phase of OPAP’s long-term development. The year included many milestones for OPAP, and we expect many more in 2017 and beyond, as part of our long-term efforts to deliver on our 2020 Vision and transform OPAP into a world-class gaming entertainment company.

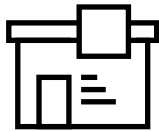
Thanks to the changes we are promoting, OPAP is now well-positioned to deliver meaningful growth in the years to come, both for the company and for the societies in which we operate. In this context, I would like to express my sincere thanks both to every member of our OPAP Team, and to all our business partners, for their hard work and contributions.

All of us at OPAP look forward to the exciting period that lies ahead and, on behalf of every member of the OPAP Team, I do hope you take the opportunity to read this report which seeks to gives stakeholders an insight into our performance, our objectives, our efforts and our major initiatives.

Damian Cope
Chief Executive Officer



B. AT A GLANCE



WHO WE ARE

59

YEARS OF HISTORY,
GROWING ALONGSIDE
GREEK SPORTS



WE OFFER AN EXTENSIVE
PRODUCT PORTFOLIO
OF LEGACY GAMES

70.2%

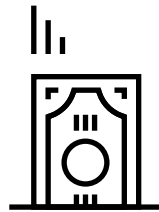
SHARE OF THE TOTAL
GREEK LEGAL GAMING
MARKET



WE HAVE
ESTABLISHED

8

STRATEGIC PRIORITIES
TO ENSURE
FUTURE SUCCESS



INTERNAL
OPERATION

WE INFORMED

100%

OF OUR EMPLOYEES
ON OUR ANTI-CORRUPTION
POLICIES & PROCEDURES

WE ADDRESS

12

STAKEHOLDER
GROUPS

0

VIOLATION INCIDENTS
CONCERNING OUR CODE
OF CONDUCT

0

INCIDENTS
OF CORRUPTION

USE THE GRI G4 GUIDELINES,
MAKING REFERENCE TO OVER

60

GRI INDICATORS
AND OVER

290

QUANTITATIVE INDICATORS

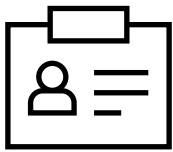
WE HAVE
COMMUNICATED
OUR CODE OF CONDUCT TO

100%

OF OUR EMPLOYEES



B. AT A GLANCE



CUSTOMER SERVICE

96%

OF COMPLAINTS
RESOLVED WITHIN
ONE WORKING DAY

OVER

80

REGULAR
AND AD-HOC RESEARCH STUDIES
TO

45,000

CUSTOMERS

95%

OF ANSWERED CONTACTS

85%

IN POST CALL
SATISFACTION INDEX

OVER

550,000

INTERACTIONS TO OPAP
AND PAME STOIXIMA
FACEBOOK PAGES



ESTABLISHED A **RETAIL
EXCELLENCE TEAM**
THAT WILL IMPROVE AGENCIES'
OPERATION



NETWORK
DEVELOPMENT



INFORMED

100%

OF OUR AGENTS
AND TRAINED

975

OF THEM ON PRINCIPLES
AND RULES OF RESPONSIBLE
OPERATION

THE LARGEST COMMERCIAL
NETWORK IN GREECE WITH

4,527

AGENCIES AND

7,191

ADDITIONAL POINTS
OF SALE AND STREET VENDORS
TO DISTRIBUTE SCRATCH TICKETS
AND PASSIVE LOTTERIES

OVER

70,000

VISITS FROM OUR
MERCHANDISING TEAM
TO OUR SALES NETWORK

OVER

40,000

ONE-TO-ONE
MEETINGS OF SALES
REPRESENTATIVES
WITH OUR AGENTS

OVER

22,000

TRAINING HOURS
TO OUR SALES NETWORK

B. AT A GLANCE



PLAYER
PROTECTION

100%

OF OUR GAMES DISPLAY
DETAILED INFORMATION
ON RESPONSIBLE GAMING

INFORMED

100%

OF OUR EMPLOYEES
ABOUT THE RESPONSIBLE
GAMING PRINCIPLES
AND RULES



DISTRIBUTE A
RESPONSIBLE GAMING
INFORMATIVE BROCHURE
THROUGH

100%

OF OUR AGENCIES



LEVEL

3

CERTIFICATION
BY THE WORLD LOTTERY
ASSOCIATION, FOR
APPLYING RESPONSIBLE
GAMING PRINCIPLES
IN OUR DAILY OPERATION



SOCIETY
SUPPORT



MADE A DIFFERENCE
TO OVER

1.5 M

OF PEOPLE THROUGH
OUR SOCIETAL SUPPORT
PROGRAM

SUPPORTED

282

ACTIVITIES THROUGH
OUR SOCIETAL SUPPORT
PROGRAM

INVESTED

€28.5*

MILLION

*also includes investment for goodcause campaigns

REDUCED CO₂ EMISSIONS BY

0.2%

REDUCED PURCHASED
PAPER BY

11.2%

REDUCED WATER
CONSUMPTION BY

8.7%

WE INFORMED

100%

OF OUR EMPLOYEES
ON ENVIRONMENTAL
PROTECTION ISSUES

ALLOCATED

86%

OF TOTAL
PROCUREMENT
SPENDING TO
LOCAL SUPPLIERS

GATHERED

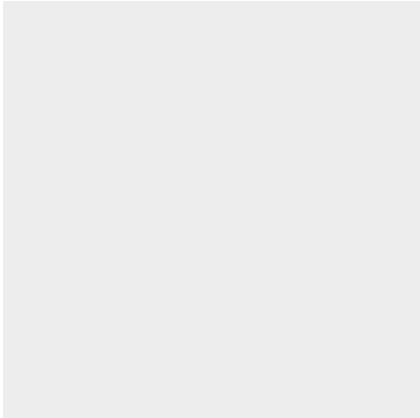
151

BLOOD UNITS
THROUGH OUR EMPLOYEES'
VOLUNTARY BLOOD
DONATION PROGRAM

B. AT A GLANCE



PEOPLE
DEVELOPMENT
AND
ENGAGEMENT



100%

OF OUR EMPLOYEES
PARTICIPATED IN
PERFORMANCE
EVALUATION PROCESS

INCREASED
TRAINING HOURS BY

93.2%

26.3%

OF WOMEN IN ALL
MANAGEMENT POSITIONS

TRAINED

100%

OF OUR EMPLOYEES
ON EMERGENCY AND EVACU-
ATION PROCEDURES

INCREASED
THE NUMBER OF
OUR EMPLOYEES BY

17.1%



24.5%

OF OUR EMPLOYEES
TRAINED AT LEAST
ONCE

DIRECTLY EMPLOY

1,005

EMPLOYEES, AT GROUP LEVEL
(973 IN GREECE AND 32
IN CYPRUS)

SUPPORT APPROXIMATELY

32,800

WORK POSITIONS
ALL OVER THE COUNTRY

DISTRIBUTED OVER

€56

MILLION
FOR EMPLOYEES

MAINTAINED
PRIZE PAYOUTS AT

67%



GROUP
FINANCIAL
RESULTS

€297

MILLION
TO SUPPLIERS



€2,833

MILLION
TO PLAYERS

ONE OF THE LARGEST
CONTRIBUTORS
TO THE NATIONAL ECONOMY,
WITH

€783

MILLION

€1,397.6

MILLION REVENUE (GGR)

€357

MILLION
TO OUR NETWORK
PARTNERS

€273.5

MILLION
SOLID CASH POSITION

€307.5

MILLION
EBITDA

€170.2

MILLION
NET PROFITS

C. STRATEGY

LOOKING TO THE FUTURE
DRIVEN BY A CLEAR MISSION
AND STRATEGY

We are the leading gaming company in Greece and the exclusive operator of all Numerical Lotteries, Sports Betting games and Horseracing Mutual betting.

Driven by our “2020 Vision” to establish OPAP as a world-class gaming entertainment company, we have established a set of 8 strategic priorities that will help us generate, capture and sustain value for the community, for the market and for our operation.



01
EMBEDDING
CUSTOMER OBSESSION

The first strategic priority is all about the Customer. OPAP is a consumer-facing business serving millions of customers. OPAP aims to be more customer-centric as a company. This will be achieved by understanding our customer better, increasing our internal focus and continuously responding to changing customer behavior.

02
INVESTING
IN OUR NETWORK

Next is the foundation of our business, our Network. OPAP aims to develop its agencies to be the customer's local entertainment destination. Each agency acts as the heartbeat of every local community. OPAP will invest in the agencies themselves, introducing a number of new products and services.

The company also places emphasis to align its interests with those of its agents and to increase the level of support that provides to them.

03
DEVELOPING OUR
PEOPLE

Our people are at the heart of everything we do, contributing to the success of our Company. OPAP's strategic objective is to build highly-motivated teams, drive a performance culture and reward its employees, while creating a strong, engaging and fun employee experience that will also drive a strong customer experience.

Thus, our aim is to attract new talents to the Group, develop our existing people further through our OPAP Academy program, as well as ensure our people are engaged through two-way internal communications, and retained by providing opportunities for career development and recognition.

04
BUILDING A WORLD-CLASS
PORTFOLIO OF PRODUCTS
& SERVICES

The objective of the fourth strategic priority is to offer customers a broad range of attractive products, whenever and wherever they want. One aspect where OPAP can make progress is in the area of Products. There are many products across the Group, but the level of focus can be improved.

Our Product team has been tasked to enhance existing product portfolio, especially sports betting, and introduce new ones, notably better Virtual products and VLTs. New, non-gaming services, such as Tora Direct S.A. products, will be introduced across the company's network and continuously investigate various opportunities to leverage the increasing power of video content across the Group.

05
LEVERAGING THE LATEST
DIGITAL & TECHNOLOGY
CAPABILITIES

The transformation of the Digital & Technology role within the Group consists one of our objectives, which will be achieved by taking steps to guarantee more speed and more control in the ongoing delivery and improvement of OPAP's products for the customers. This involves investment in people and systems that will deliver improved capabilities.

Gaining more industry knowledge, accelerating delivery with long-term strategic approach to increase the flexibility and agility of the company's technology, as well as to achieve easy integration with third party content and applications consist factors which will lead to improved digital experience.

C. STRATEGY

06
COMMITTING TO OUR
COMMUNITIES

OPAP understands that it has an important role within the communities in which it operates, both in Greece and Cyprus, and aims to create long-term and meaningful benefit, in order to contribute to building a brighter future. OPAP's operations display strong commitment for health, sports and employment.

In addition, OPAP focuses on stakeholders' engagement. Specifically, our people and customers participate in our programs, which create stronger bonds with each other and contribute to building stronger communication with customers on both national and local level.

Last but not least, the company adopts and develops the highest standards of integrity and responsibility which are part of an integrated Responsible Gaming strategy. The continuous improvement of the policies and procedures Group-wide, the substantial investment in training to help ongoing player protection and into educational campaigns to promote Responsible Gaming, as well as the international recognition by clear KPI's consist the framework of this strategic pillar's approach.

07
EXPANDING THE POWER
OF OUR BRAND

The OPAP brand has a remarkable level of recognition both in Greece and Cyprus, but there is even more we can do to bring the brand alive. By re-establishing our brand's identity and making the most of our powerful 'anthropaki' logo, the company can further extend its brand's reach and impact, as well as strengthen its dedication to maintain a strong and consistent emotional connection with its customers.

Of course, OPAP has to take into account the risks and barriers, in order to:

- Reinforce credibility and transparency with further communication and evidence of reasons to trust our games.

- Review winnability rates for all games and ensure maximum visibility of winning players and games.
- Increase our existing comprehensive program, both internally and externally, to demonstrate our commitment to Responsible Gaming.

08
REBUILDING HEALTHY
RELATIONSHIPS WITH
THE STATE, REGULATOR
AND OTHER BODIES

OPAP intends to work closely with all key stakeholders: the government, the regulator and other interested parties, maintain an open dialogue and establish a better common understanding for main items including tackling illegal gaming and promoting responsible gaming practices.



Leadership

I. WHO WE ARE

| | |
|--|----|
| 1. OUR COMPANY | 22 |
| 2. OUR GAMES PORTFOLIO | 38 |
| 3. OUR TECHNOLOGY CAPABILITIES & VALUE CHAIN | 44 |





STRATEGIC
PRIORITY-2020 VISION

Expanding the power of our brand

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- Reinforce credibility and transparency with further communication and evidence of reasons to trust our games.
- Review winnability rates for all games and ensure maximum visibility of winning players and games
- Increase our existing comprehensive programme, both internally and externally, to demonstrate our commitment to Responsible Gaming.

1. Our Company



I. WHO WE ARE

1. Our Company

OUR BRAND

OPAP, the leading gaming company in Greece and the exclusive operator of all Numerical Lotteries, Sports Betting games and Horseracing Mutual betting, was established in 1958 and listed in the Athens Exchange in 2001. Through a joint venture, OPAP is also the exclusive operator of State Lotteries and Instant Win Games

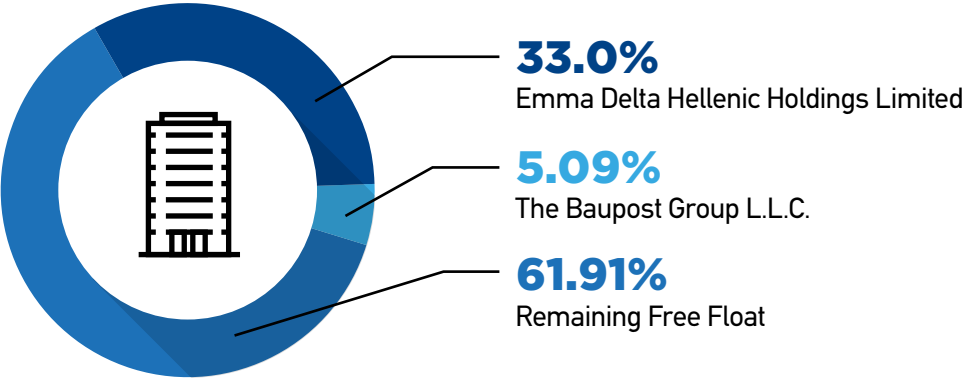
(Scratch) and also holds the exclusive license to operate Video Lotteries Terminals ('VLTs') in Greece.

OPAP Group of Companies includes the parent company OPAP S.A. and its subsidiaries.

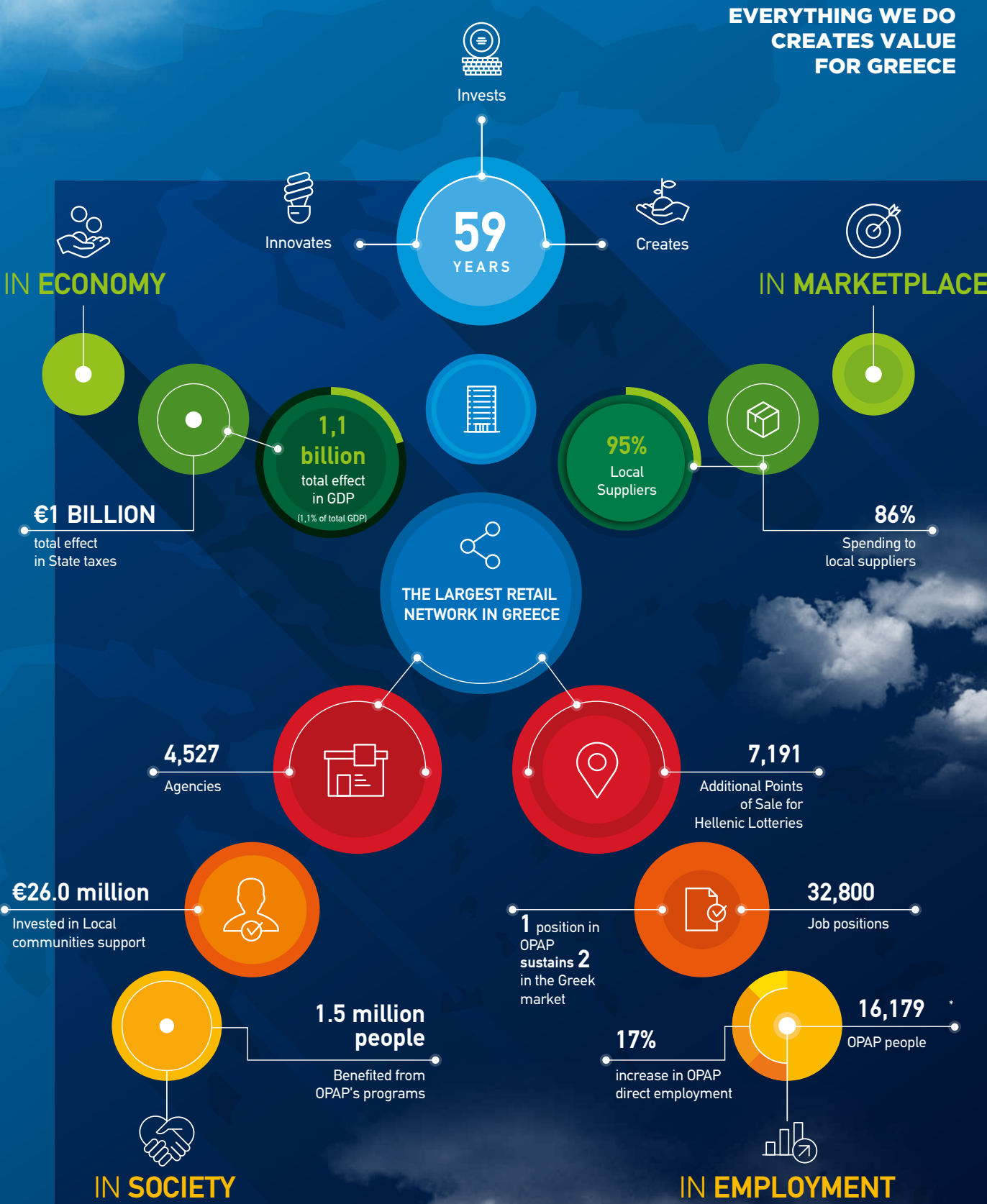
OPAP GROUP OF COMPANIES

| COMPANY | HOLDING | HEADQUARTERS | MAIN ACTIVITY |
|-------------------------|----------------|--------------|--|
| OPAP S.A. | Parent company | Greece | Numerical Lotteries & Sports Betting games |
| Hellenic Lotteries S.A. | 67% | Greece | Lotteries |
| OPAP Cyprus LTD | 100% | Cyprus | Numerical Lotteries |
| OPAP Sports LTD | 100% | Cyprus | Sports Betting games |
| OPAP International LTD | 100% | Cyprus | Holding company, Services |
| OPAP Services S.A. | 100% | Greece | Sports events, Promotions, Services |
| OPAP Investment LTD | 100% | Cyprus | Holding company, Services |
| Tora Direct S.A. | 100% | Greece | Payment Services |
| Horse Races S.A. | 100% | Greece | Horseracing Mutual betting |
| Tora Wallet S.A. | 100% | Greece | Provision of Financial Services |
| Glory Technology LTD | 20% | Cyprus | Provision of Software Services |
| Neurosoft S.A. | 30% | Greece | Provision of Software Services |

SHAREHOLDER STRUCTURE



Data refer to 31/12/2016



Source: FOUNDATION FOR ECONOMIC & INDUSTRIAL RESEARCH, May 2017
*The number includes all Group employees

I. WHO WE ARE

For almost 59 years, our brand has been one of the most recognizable and appreciated brands in Greece, since our logo and brand visuals are visible in hundreds of different touchpoints, from television advertising and sport clubs' branding up to all game slips and stickers in agencies.

Our logo is used from employees, agents, suppliers, partners, press representatives and end customers in thousands applications. In order to further capitalize on our brand, within 2016 we:

- Reviewed all our touchpoints and issued a universal Brand Guidelines Book across our company and the Group.
- Further connected our brand with our products in all our communication and brand materials.
- Launched a comprehensive approach on all our sponsorship partnerships to create stronger connection with the brand for both internal and external audiences.
- Launched our initiative of internal and external Brand ambassadors.
- Implemented a dedicated program to strengthen our company's and brand's credibility, through initiatives such as redesign of TV broadcasted draws.

As a result of these initiatives OPAP's image and overall consumers brand evaluation has improved:

- Brand Evolution has improved by 7% amongst Players and 4% amongst total population, compared to December 2015.
- Brand Familiarity has improved by 8% amongst Players and 2% amongst total population, compared to December 2015.

GOOD PRACTICE
CHANGE OF COMPANY'S
HEADQUARTERS



In July 2016, OPAP moved to its fully owned brand new headquarters, located at the Athens Municipality (112 Athinon Avenue, GR10442 Athens – Greece); thus, creating a best in class workplace.

OUR INDUSTRY

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

- Numerical games.
- Betting (Sports Betting and Horseracing Mutual betting).
- Instant and Passive Lotteries.
- Casinos (includes all games played within casinos).
- Online offshore.

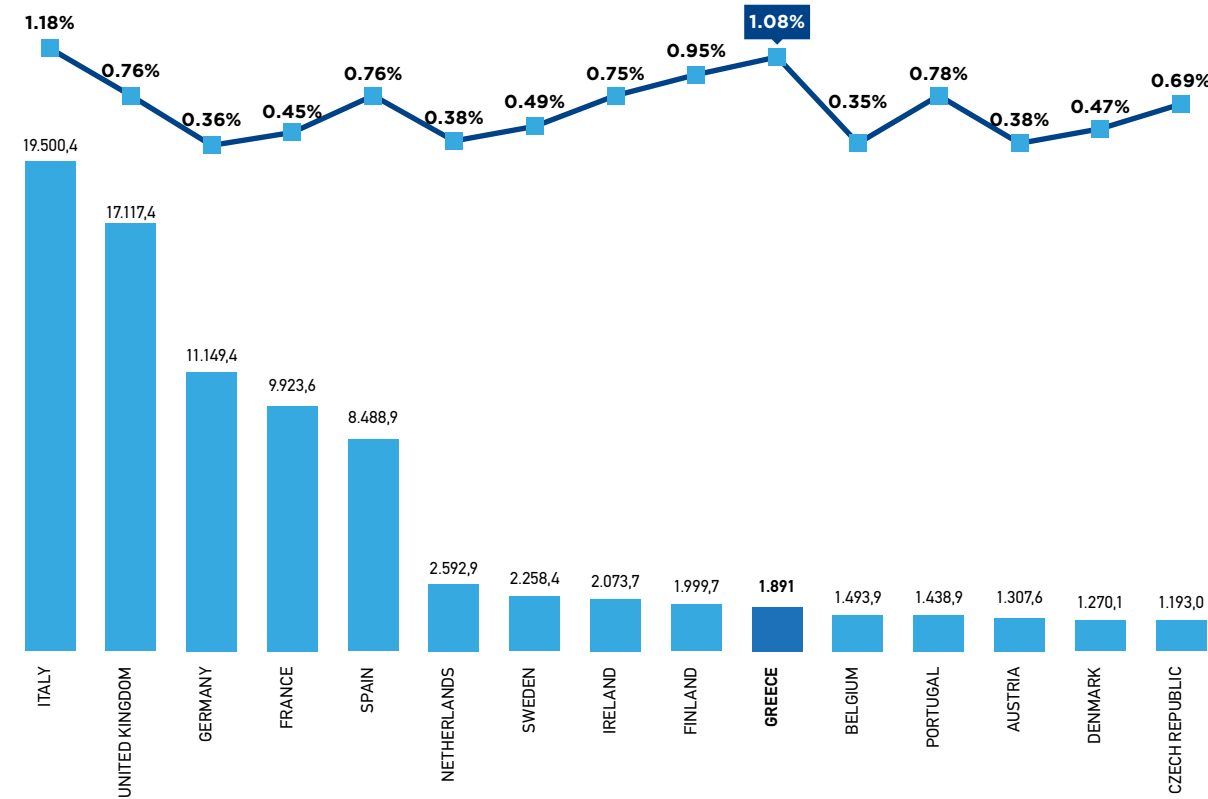
In 2016, Gross Gaming Revenues (GGR: wagers minus prize payouts to lottery and betting winners) from regulated operators in Greece was estimated to be approximately €1.89 billion.

In terms of Gross Domestic Product, the Greek gaming sector accounted for 1.08% of the country's GDP for the year ended December 31, 2016.

This brings Greece at the third place in 28 EU countries, according to H2GC, the leading source of data regarding the global gambling industry.

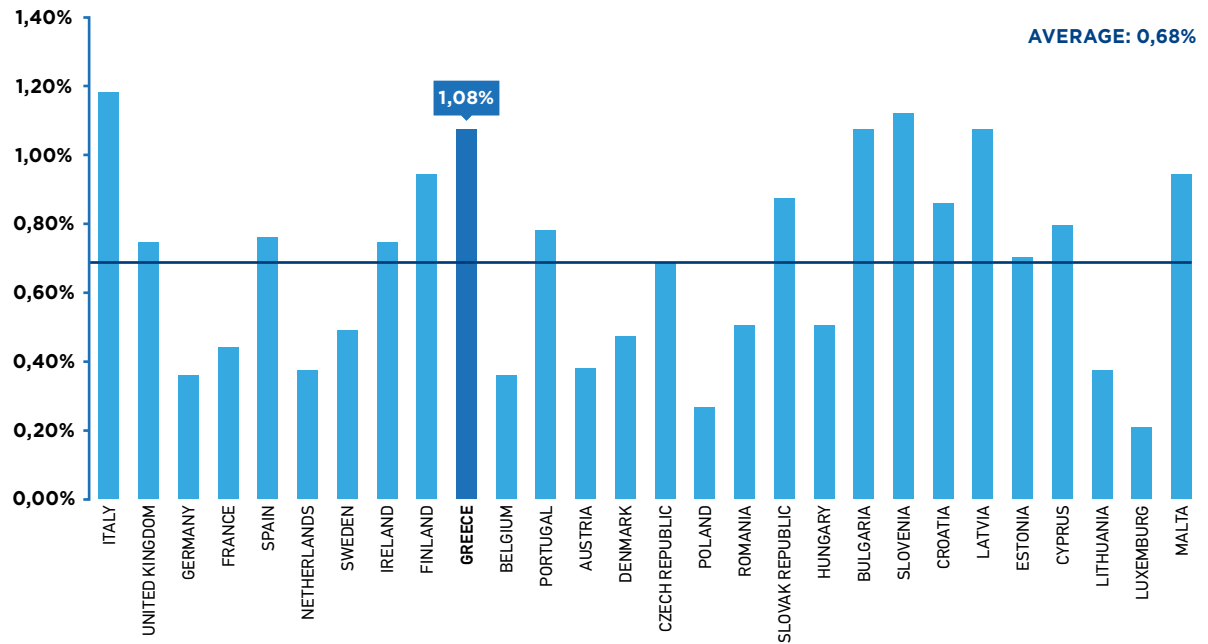


GGR AS % OF GDP (CERTAIN EU COUNTRIES)



Source: H2GC, Greek numbers have been adjusted for OPAP's reported figures
*Amount in million euros

GGR AS % OF GDP (ALL 28 EU COUNTRIES)

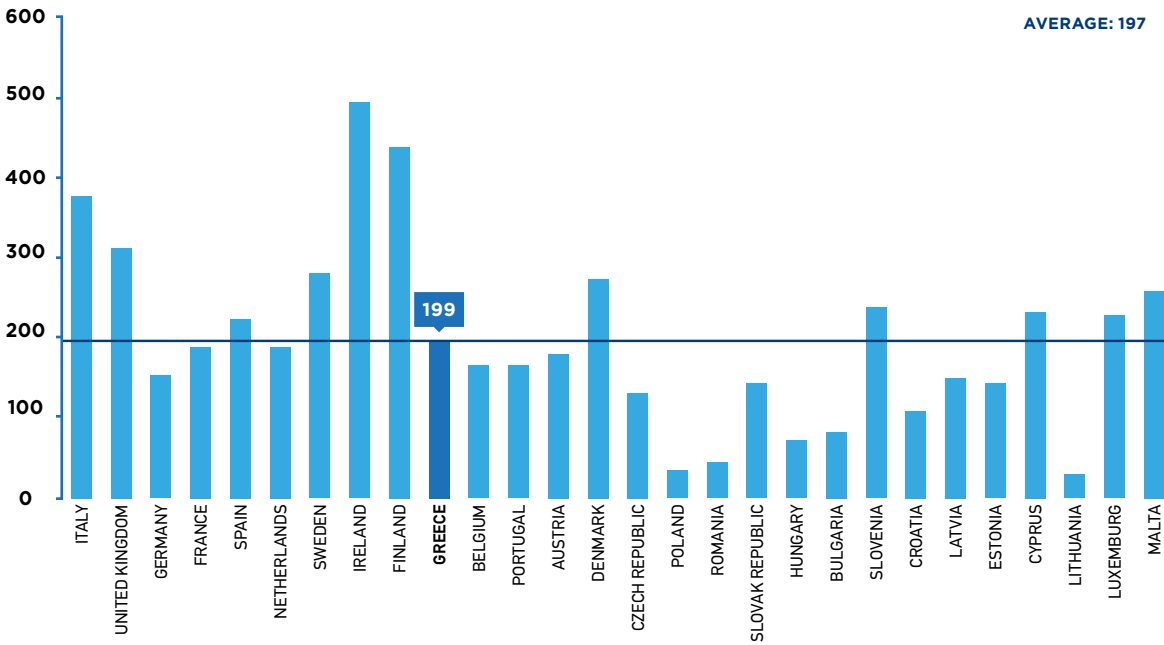


Source: H2GC, Greek numbers have been adjusted for OPAP's reported figures

I. WHO WE ARE

The gaming expenditure per adult in Greece stands marginally above the average of the 28 EU Countries at €199.

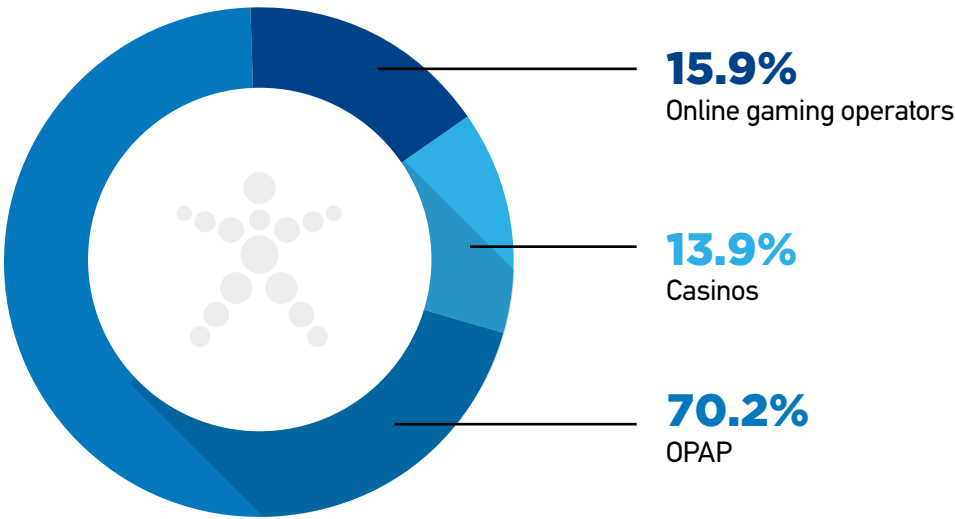
GGR IN EUROPE PER ADULT IN 2016



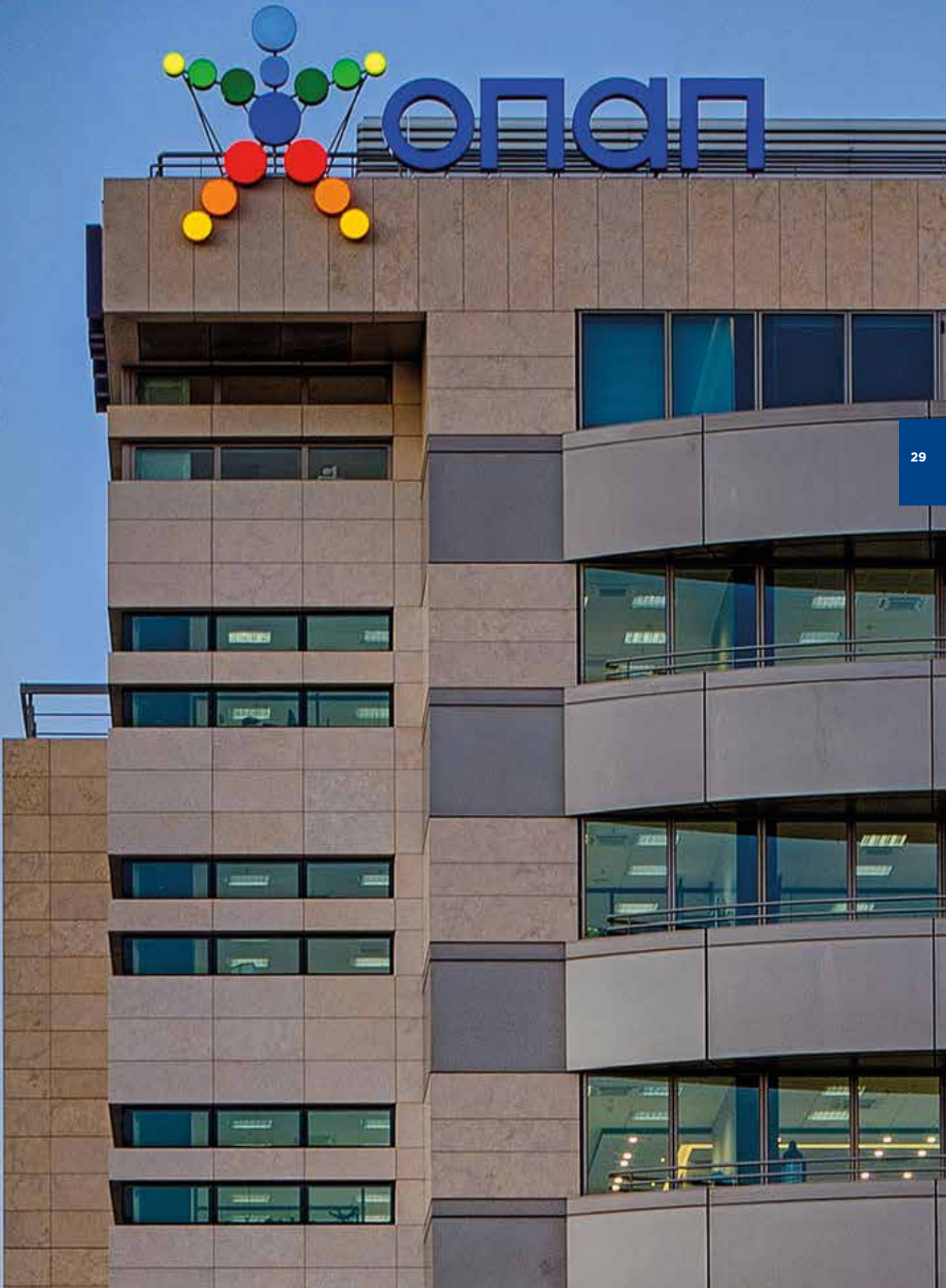
Source: H2GC, Greek numbers have been adjusted for OPAP's reported figures
*Amount in euros

According to H2GC's numbers for Greece in 2016, OPAP held a 70.2% GGR market share, mainly due to the success of KINO, SCRATCH tickets and passive lotteries.

GGR IN THE GREEK GAMING SECTOR



Source: H2GC, adjusted for OPAP's reported figures
*OPAP's market share also includes Horse Racing market share
**Data refer to 31/12/2016



I. WHO WE ARE

OUR CULTURE

OUR 2020 VISION IS
TO ESTABLISH OPAP AS A WORLD
CLASS GAMING ENTERTAINMENT
COMPANY.



THE 3 STEPS TO
ACHIEVE OUR VISION



ORGANIZATION

Build the Strongest OPAP
Team by putting in place a
new structure to deliver our
long-term objectives

PRIORITIES

Establish Long-Term
Strategic Priorities each
with a clear set of
operational milestones



CULTURE

Define a clear set of Core
Values that run throughout
every member of the OPAP
family

01

STEP

02

STEP

03

STEP

OUR VALUES



I. WHO WE ARE

OUR REGULATORY FRAMEWORK

Similarly to most European countries, the Greek gaming sector is regulated and controlled by the Hellenic Gaming Commission (HGC), which was formally established in 2012 as an independent administrative authority. HGC's objectives are to establish the regulatory framework and set the standards to ensure that gaming and betting within the Greek Territory are organized and conducted in a transparent and fair manner and are not subject to illegal activities or exploitation, as well as protect the interests of players and society. The regulatory activities of HGC are conducted within a series of regulations that either refer to the overall gaming sector (horizontal regulations such as the Decision no. 129/2/07.11.2014, as currently in force following announcement occurred with Decisions no. 155/6/24.04.2015, 163/6/09.07.2015, 166/5/23.07.2015 in accordance to the provisions of Law no. 3691/2008, as currently in force, concerning tackling money laundering and terrorism financing), or relate to specific games or gaming category, or its processes by their respective operators.

Gaming Concession

In 2000, OPAP entered a 20-year concession agreement with the Hellenic Republic and has 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 November 2011 and is valid till October 12, 2030. In the case of PAME STOIXIMA and MONITOR GAMES, for which OPAP has exclusive right to offer them online until October 12, 2020. Under the terms of the concession agreement and in accordance with the terms of Article 27, paragraph 9a of Law no. 2843/2000, OPAP was also granted the exclusive right to operate and manage any new Sports Betting games in Greece and reserves the right of first refusal of the right to operate and manage any new game, in case the law allows this game.

Lottery Concession

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

VLT License

Since 2011, OPAP holds an exclusive 10-year license to install and operate 35,000 Video Lotteries Terminals (VLTs) in Greece, out of which 16,500 will be installed and operated by OPAP, within current OPAP agencies and a network of gaming halls exclusively for VLTs operations, while the remaining 18,500 will be put up for a public international tender to be installed and run by sub-concessionaires.

The introduction of a new VLTs regulation by HGC (Decision no. 225/2/25.10.2016, GG 3528 B' 01-11-2016) allowed OPAP to restart its project to operate VLTs in Greece. In 2017 we commenced operation of VLTs project, with the roll out both in Play Gaming Halls as well as in selected POS of the existing network being in progress.

Horse Racing Concession

After completing all terms and conditions provided on the Accession Agreement between Hellas Horse Races S.A. and HRADF, the company holds the exclusive right to organize and conduct terrestrial and online Horseracing Mutual betting in Greece for 20 and for 5 years respectively and commenced its horse racing operations in January 2016.

Casino (non-OPAP activity)

There are 12 casino licenses in Greece, out of which 9 are active.

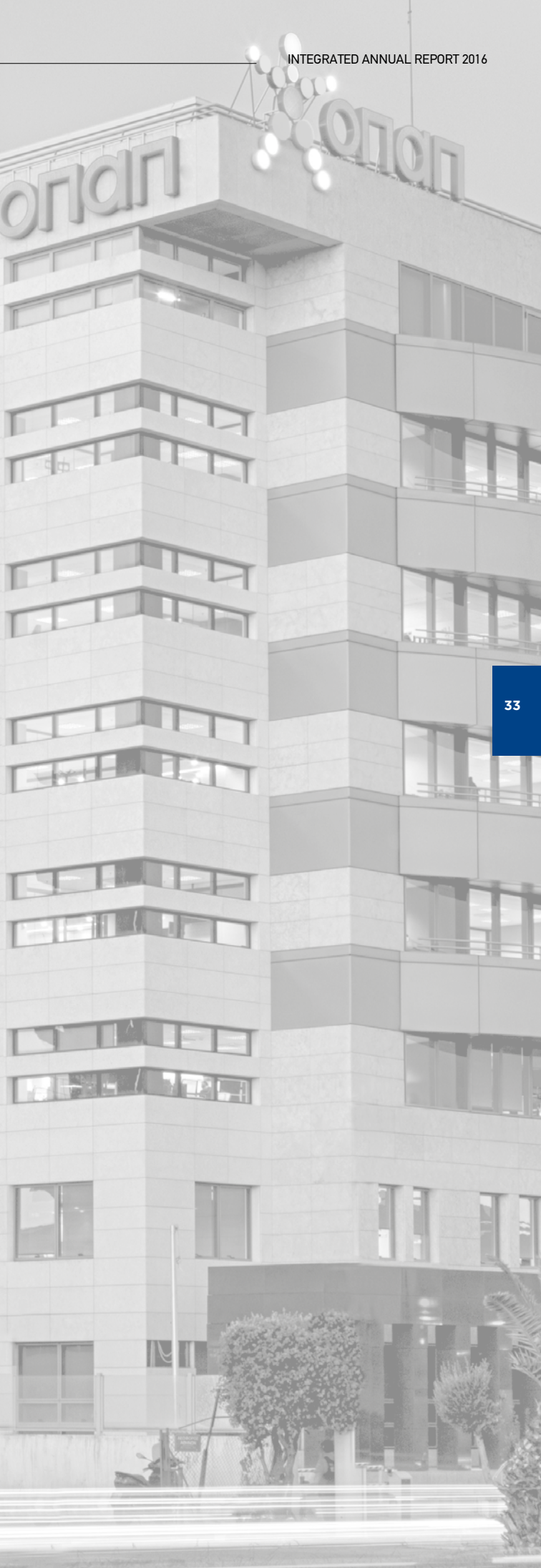
Online Gaming

The Gaming Concession entitles OPAP to exclusively conduct online gaming in Greece and HGC can blacklist any illegal operators by banning online access through local ISPs. The preliminary framework for online gaming licensing in the future was set up in 2011 and does not affect the exclusive games offered by OPAP.

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

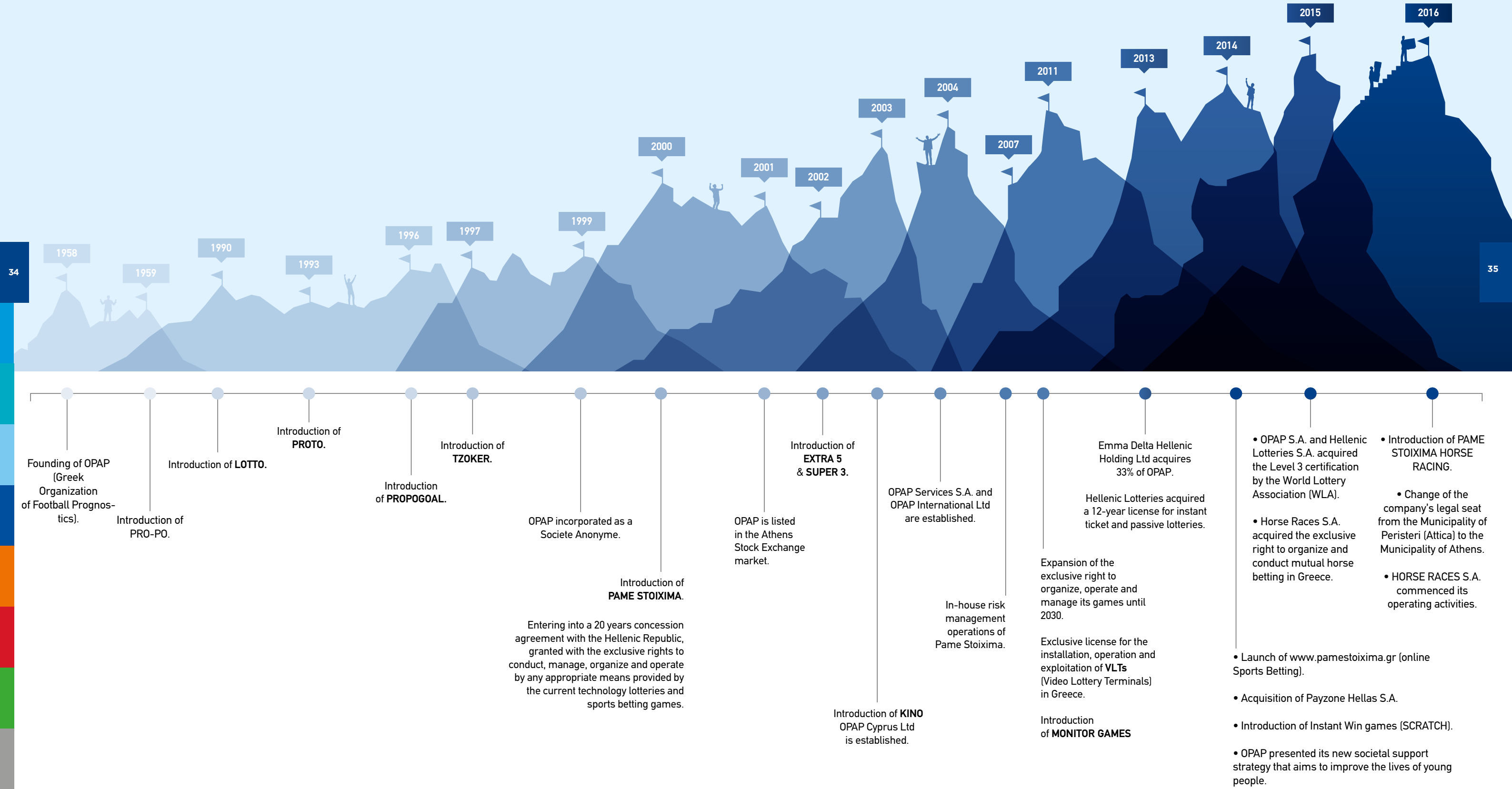
- Compliance with the terms of the Gaming Concession, the VLTs License and the gaming legislation.
- Protection of consumers against excessive participation and crime related to games of chance.
- Protection of minors and other vulnerable groups.
- Reliability of games and players' winnings.
- Protection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

OPAP must not adopt any decision or enter a new contract for which the Committee has expressed in written its reasoned disagreement. In case the Committee considers that OPAP does not comply with the above, it immediately informs the Hellenic Gaming Commission to assume proper corrective measures.



I. WHO WE ARE

OUR HISTORY



I. WHO WE ARE

OUR MEMBERSHIPS

We are members of the following national and international organizations and committees:

| ORGANIZATIONS | COMMITTEES |
|---|--|
| World Lottery Association (WLA) | World Lottery Security and Risk Management Committee |
| European Lotteries Association (EL) | European Lotteries Public Affairs Coordination Committee (ELPAC) |
| Hellenic Federation of Enterprises | European Lotteries Sport Committee (EL Sport) |
| Hellenic Network for Corporate Social Responsibility | European Lotteries Public Order & Security Committee |
| European Pari Mutuel Association (EPMA) (Horse Races) | |
| Global Lottery Monitoring System (GLMS) | |
| Hellenic Institute of Customer Service | |

OUR RECOGNITIONS

Even though awards and recognitions don't drive our efforts, they constitute an important moral award. In 2016, we were proud to receive:

- The TRUE LEADERS award in ICAP Group's 'TRUE LEADERS 2016' business awards.
- 4 distinctions in Boussias Communications' Responsible Business Awards 2016, receiving:
 - The Gold Award in the 'Society (Large Enterprise)' category, for the renovation of the Children's Hospitals 'Aghia Sophia' and 'Panagiotis & Aglaia Kyriakou'.
 - The Gold Award in the 'Communication Program / Consumer or Other Stakeholder Engagement Campaign' category for the Route of Contribution within the context of the 33rd Authentic Athens Marathon.
 - The Silver Award in the 'Fundraiser / Charity Activities (Large enterprise)' category, for the 'Wishing Ornaments' initiative to support 'Together For Children' association.
 - The Bronze Award in the 'Sport (Large Enterprise)' category, for the 'Sports Academies' program.
- Recognition and an award for our Contact Center's performance from the Hellenic Institute of Customer Service and Hellenic Sales Institute.
- 10 awards in Ermis Awards 2016, receiving:
 - The ERMIS Gold Award for PAME STOIXIMA campaign.
 - ERMIS Bronze Awards for SCRATCH, LAIKO and PAME STOIXIMA 2016 campaigns.

- 3 Silver Awards in Ermis Media 2016 within the context of the Marathon Campaign 2016 in the categories:
 - Media Television', for the creative use of television to create awareness of OPAP mobile application and induce audience to participate.
 - Media Outdoor', for the creative and impactful use of outdoor as a means to provide real time update of the amount to be donated from OPAP.
 - Media Multimedia', for the creative use of multimedia (TV, outdoor, print, digital, social) to create awareness and engagement with the audience, in order to download and engage with the OPAP mobile application 'Something better'.
- 1 Gold Effie Award in Effies 2016 in the category 'Mass Media, Publications, Public, Energy, Education, Tourism, Entertainment, Transport & corresponding services' for Data Driven Marketing Performance for JOKER.
- 17 awards for our Digital campaigns, receiving:
 - 1 Gold and 2 Silver 'Digital Media' Awards.
 - 2 Silver 'e-Volution' awards.
 - 3 Gold 'Mobile Excellence' Awards.
 - 1 Gold, 2 Silver and 2 Bronze Awards in IAB MIXX.
 - 3 Gold and 1 Platinum Awards.





STRATEGIC
PRIORITY-2020 VISION

Building a World-class portfolio of Products & Services

The objective of this strategic priority is to offer customers a broad range of attractive products whenever and wherever they want.

One aspect where OPAP can make progress is in the area of Products. There are many products across the Group, but the level of focus can be improved.

Our Product team has been tasked with enhancing

existing product portfolio especially sports betting, and introducing new ones, notably better Virtual products and VLTs.

New, non-gaming services, such as TORA DIRECT S.A. products, will be introduced across the company's network continuously investigating various opportunities to leverage the increasing power of video content across the Group.

2. Our Games Portfolio



I. WHO WE ARE

2. Our Games Portfolio

OUR PRODUCTS AND SERVICES

The main orientation of the company is to improve and develop its games portfolio, as it strengthens its presence in the gaming industry and ensures that OPAP meets the needs and protects the interests of its customers in the best possible way and, at the same time, supports and creates value for the communities it operates in.

Our games are divided into fixed odds betting games

(where the final amount is fixed and is 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 below schematic positions our games in terms of fixed odds to mutual odds, as well as requiring more skills to relying more on chance.



SPORTS BETTING GAMES

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



The main game in this category is PAME STOIXIMA, where the player is asked to correctly predict the result mainly in sporting events and possibly other events, whose nature allows betting.

Released in 2000, PAME STOIXIMA includes constant fixed odds (where the final amount is fixed and is made known to players at the time of betting) and variable fixed odds (where the assigned amount changes during the betting according to the wagered amounts and are communicated to players only after the end of the betting period), while winning depends on correctly predict certain sports and other events.

NUMERICAL LOTTERY GAMES

This category contributed the most to our Gross Gaming Revenue in 2016 and consists of six games: the fixed odds games KINO, SUPER 3 and EXTRA 5, as well as the mutual games JOKER, LOTTO and PROTO. The two main games are KINO and JOKER, with the following characteristics:



KINO was launched in 2003 and has been offered in all agencies since 2004. Currently, KINO is our most successful game, with draws held every 5 minutes during the agencies' 13 opening hours per day, for a total of 180 draws a day. In each draw, 20 numbers are drawn from a total of 80 numbers through an electronic integrated encryption system which generates random numbers.

Players can choose between 12 different types of KINO games and the player is asked to provide a different set of correct numbers in each type. Latest game enchantment is 'KINO BONUS', which gives players the opportunity to multiply their initial profits and win with combinations which do not result from the game's draw.



JOKER was launched in 1997 and is the most popular and recognizable game in the Company's gaming 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.



SCRATCH & PASSIVE LOTTERIES

We introduced Lottery and Scratch lotteries in May 2014 and expanded its product portfolio with three fixed odds games, SCRATCH and the ETHNIKO and LAIKO Lotteries. In the instant win game SCRATCH, players are required to scratch certain areas on their ticket which hide numbers or symbols and win in case they reveal the correct numbers or correct symbols.

SCRATCH tickets are a highly successful game due to their high winning rates (about one in four tickets are winning lottery tickets of any type) and their extensive sales network, which includes OPAP's agencies and additional Points of Sale, such as supermarkets, kiosks and street vendors throughout Greece.



13
GAMING
EXPERIENCE S

I. WHO WE ARE

DEVELOPMENTS ON OUR
PRODUCT PORTFOLIO

We focus on ensuring ontime new product deliveries, and ongoing analysis to gain a greater understanding of customer and market trends working collaboratively with all areas of the business. The key developments for 2016 in this area were the following:

RESTART OF THE VLTs PROJECT

Following the introduction of a new VLTs regulation by the Hellenic Gaming Commission (Decision no. 225/2/25.10.2016, GG 3528 B' 01/11/2016), according to which all of the appropriate conditions were in place, OPAP restarted its plans to operate VLT products in Greece. The new regulation established a comprehensive institutional framework that secures public interest and public revenues and, at the same time, allows the economic viability of the VLT business for the company and its partners. The new regulatory framework for VLTs utilizes the latest gaming technology and wholly leverages all available restrictive measures in order to protect players, in line with international best practices in Responsible Gaming.

PARTNERSHIP WITH INSPIRED ON VIRTUAL
SPORTS

In September 2016, OPAP selected INSPIRED to launch new virtual sports betting products in the Greek market, both across OPAP's extensive agencies network, as well as online. The deployment of the new innovative and engaging virtual products by INSPIRED is consistent with OPAP's '2020 Vision' and the strategic priority of building a world-class portfolio of products and services. The launch has already started within 2017.

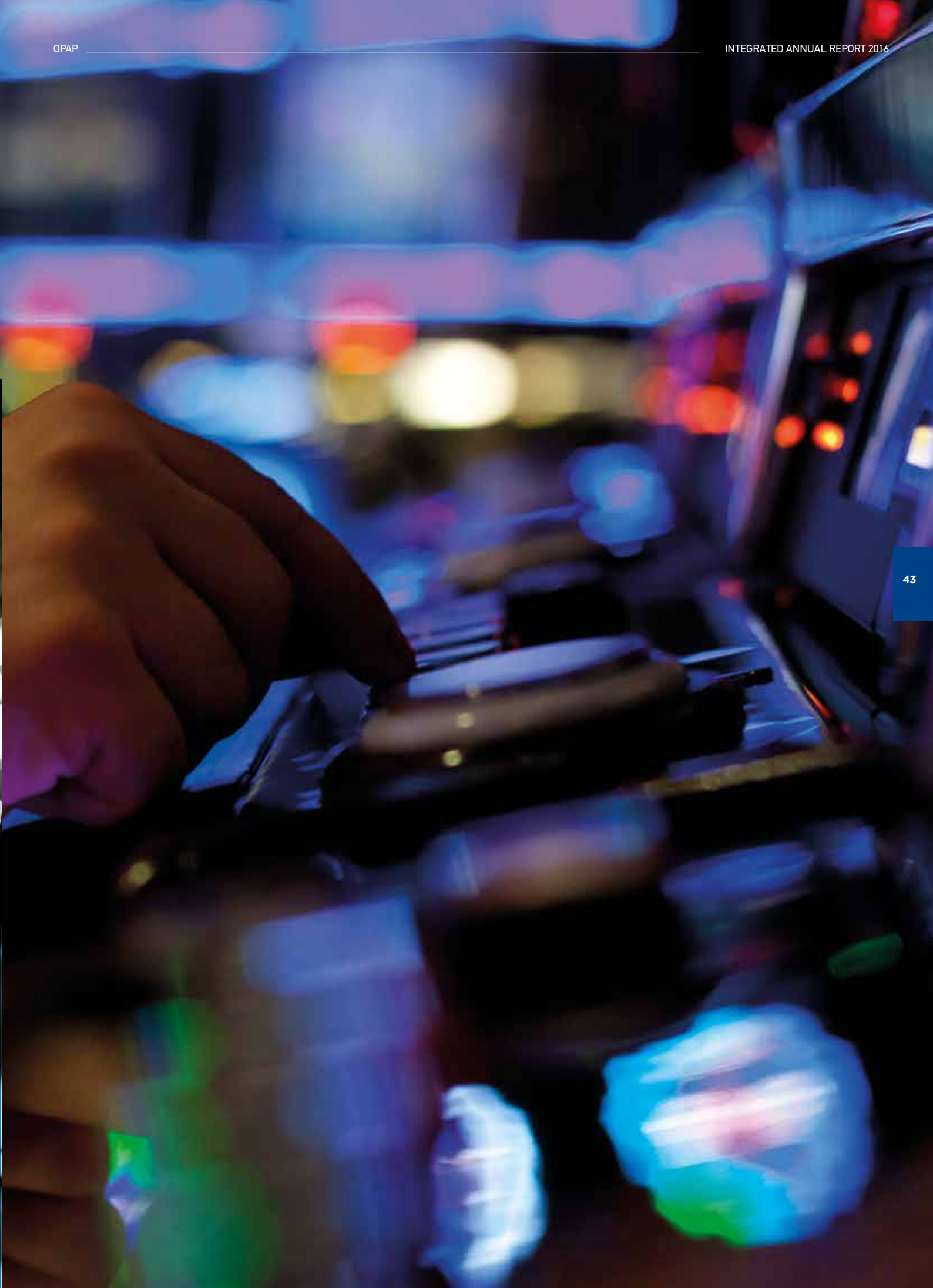
ESTABLISHMENT OF TORA WALLET S.A.

In September 2016, OPAP established Tora Wallet S.A. via its 100% subsidiary OPAP Investment LTD, which is in the final process of license attainment from the Bank of Greece as an Electronic Money Institution, in accordance with the local regulatory and legislative framework, as well as the European financial services

regulatory framework. The aim is to offer a number of financial services through our retail network, such as bill payments, money transfers, introduction of an electronic wallet and a payment card.



We focus on
ensuring ontime new
product deliveries





Leveraging the latest Digital and Technology Capabilities

The transformation of the role of Digital & Technology within the Group consists one of our objectives, which will be achieved by taking steps to guarantee more speed and more control in the ongoing delivery and improvement of OPAP's products for the customers. This involves investment in people and systems that will deliver improved capabilities.

Gaining more Industry knowledge, accelerating delivery with long-term strategic approach to increase the flexibility and agility of the company's technology, as well as to achieve easy integration with third party content and applications consist factors which will lead to improved digital experience.

3. Our Technology Capabilities & Value Chain



I. WHO WE ARE

3. Our Technology Capabilities & Value Chain

OUR TECHNOLOGY CAPABILITIES

In today's business environment, digital and technology capabilities are a fundamental aspect to transform business functions and operational processes.

Therefore, we work to ensure that we are equipped for a changing digital environment and that we effectively and properly utilize technology to provide an enhanced customer experience. Within 2016, we:

- Migrated our main Information Technology systems to a new, modern and state-of-the-art datacenter, which is best suited for our future needs.
- Carried out an exhaustive review of the company's IT landscape and all our major systems and solutions, in collaboration with specialist consulting firms, with substantial industry knowledge. Within this context, we focused on the lottery and sports systems for retail and digital channels (which represent our core businesses) and on the engagement model we want to establish with key suppliers for these solutions, in order to assess the best available Lottery and Betting platforms and select trusted technology partners.
- Reviewed all existing infrastructure and connectivity solutions in the wider gaming industry.
- Designed a new solution to underpin the agencies' technology transformation.
- Began a substantial recruitment process to create internal IT expertise and strengthen digital skills, in order to implement the process to transform the role of Digital and Technology within our company.



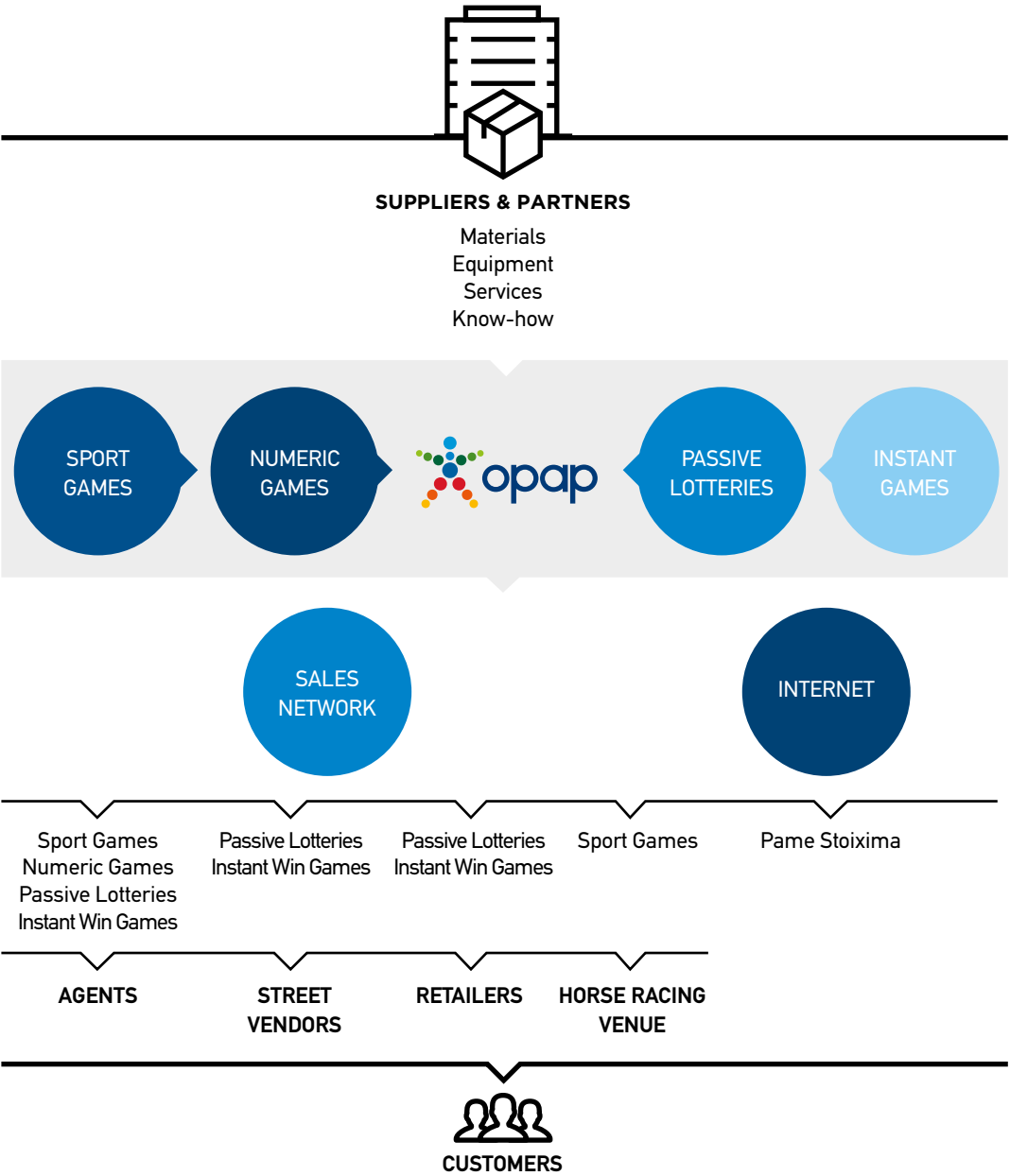
We work to ensure that we are equipped for a changing digital environment.

OUR VALUE CHAIN

For our operation, we utilize resources from our suppliers (materials, equipment, services and know-how), which are used to organize, operate and conduct our games of chance.

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



Management



2020 VISION
STRATEGIC PRIORITY

Rebuilding Healthy Relationships: Government, Gaming Regulators, Other

OPAP intends to work closely with all key stakeholders: the government, the regulator and other interested parties, maintain an open dialogue and establish a better common understanding for main items including tackling illegal gaming and promoting responsible gaming practices.

II. OPERATING RESPONSIBLY

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II. OPERATING RESPONSIBLY

1. Corporate Governance

WE EMBED RESPONSIBILITY INTO THE WAY WE OPERATE

Code of Conduct

OPAP's Code of Conduct outlines the main principles and behavioural rules, as well as provides guidance to all members (i.e. Board of Directors, Chief Unit Officers, managers and employees) on issues that may arise within OPAP. The Code has been communicated to all employees, who have signed for the acknowledgement and acceptance of its guiding principles and provisions on the following issues:

- Governing principles and company values.
- Operational Framework: Legal and Regulatory compliance, Advertising, Sales promotions and Corporate communication.
- Personal and business integrity: Conflicts of interest, Competition law, Social media, Prohibition of play, Money laundering, Fraud, Bribery and Corruption, Cooperating with Government Investigations, Corporate Responsibility Report, Environment, Health and Safety, Business monitoring and control.

- The resources of OPAP Group and its customers: Confidentiality, Insider trading, Intellectual property, OPAP Group assets, Information security, Physical security, Data protection (company data, records and reports), Player services, Player protection, Preventing excessive and underage play.
- People: Respect for the individual, Equal opportunities, Diversity.
- Whistle blowing: Implementation – Violations, Whistle blowing complaints.
- Ensuring stakeholders' awareness.

GOOD PRACTICE
PROHIBITING
POLITICAL
CONTRIBUTIONS

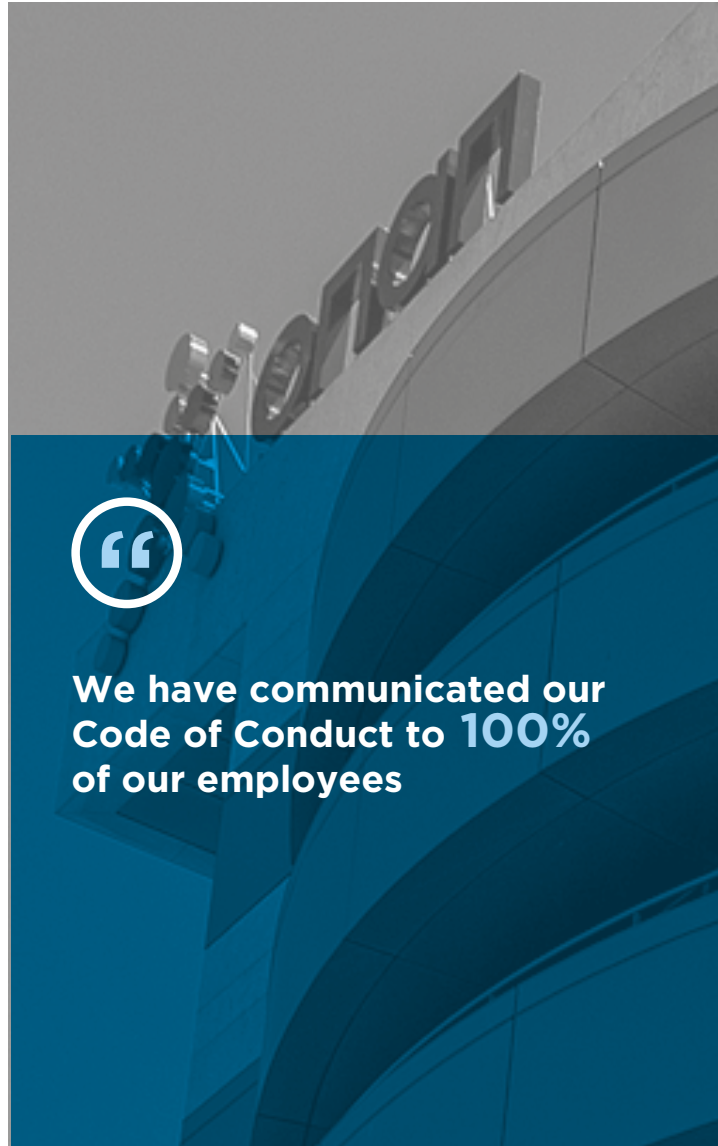


OPAP's Code of Conduct firmly dismisses any payment, commission or donation to any political party or elected officer and strictly prohibits offering financial or other advantage to any candidate for, or holder of, a public position or a political party. It must be noted that in 2016, no donations were made to politicians and political parties.

GOOD PRACTICE
PROHIBITING GIFTS
AND DONATIONS
FOR FAVORABLE TREATMENT



OPAP's Code of Conduct strictly prohibits all employees to offer, solicit or accept gifts, donations in cash or any other form and any benefit related to their performance and cannot offer, provide, accept or promise, either directly or indirectly, any undue financial or other advantage to a public and/or private official to obtain any favorable treatment or business advantage. Employees are only allowed to accept non-cash gifts with an indicative value below €250, which arise out of ordinary and standard business practices.



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

GOOD PRACTICE

RAISING CONCERNS AND
WHISTLE BLOWING



All employees are obliged to adhere to the Code of Conduct's principles and if they suspect that they are not followed, employees and Board of Directors/Chief Officers can report their concerns to their immediate manager and Compliance Officer respectively. In cases where employees cannot speak to their immediate manager, they can report their concern anonymously, through the established whistle blowing mechanism, by any of the following means:

- Send an email to whistleblowing@opap.gr.
- Contact the number 210 5798193.
- Via a personal hearing.

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

Within 2016, there were no reports or complaints raised through the whistle blowing mechanism.

Internal Rules and Regulations

OPAP's Internal Rules & Regulations are prepared in compliance with Law no. 3016/2002, Article 6, on the basis of the company's Articles of Association and generally in line with the applicable legislative framework. Within 2016, the BoD approved our new Internal Rules and Regulations, which are available through our Investor Relations website.

POLICY

CODE OF CORPORATE
GOVERNANCE




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). 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.



II. OPERATING RESPONSIBLY

OUR BOARD OF DIRECTORS




Kamil Ziegler
Executive Chairman
EXECUTIVE MEMBER

| | |
|--------------------|------------------|
| TERM START DATE | TERM END DATE |
| 2013 | 2017 |




Damian Cope
Chief Executive Officer
EXECUTIVE MEMBER

| | |
|--------------------|------------------|
| TERM START DATE | TERM END DATE |
| 2016 | 2017 |




Spiros Fokas
A' Vice-Chairman
EXECUTIVE MEMBER

| | |
|--------------------|------------------|
| TERM START DATE | TERM END DATE |
| 2013 | 2017 |




Pavel Horak
B' Vice-Chairman*
EXECUTIVE MEMBER

| | |
|--------------------|------------------|
| TERM START DATE | TERM END DATE |
| 2013 | 2017 |




Michal Houst
Member - CFO
EXECUTIVE MEMBER

| | |
|--------------------|------------------|
| TERM START DATE | TERM END DATE |
| 2013 | 2017 |




Christos Kopelouzos
Member
EXECUTIVE MEMBER

| | |
|--------------------|------------------|
| TERM START DATE | TERM END DATE |
| 2013 | 2017 |




Georgios Melisanidis
Member
INDEPENDENT MEMBER

| | |
|--------------------|------------------|
| TERM START DATE | TERM END DATE |
| 2013 | 2017 |



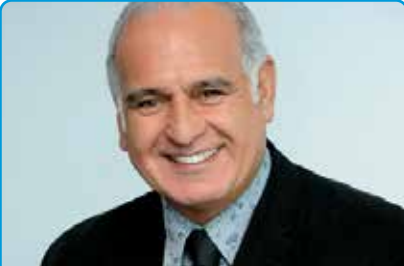
Marco Sala
Member
INDEPENDENT MEMBER

| | |
|--------------------|------------------|
| TERM START DATE | TERM END DATE |
| 2013 | 2017 |



Pavel Saroch
Member*
INDEPENDENT MEMBER

| | |
|--------------------|------------------|
| TERM START DATE | TERM END DATE |
| 2016 | 2017 |




Rudolf Jurcik
Member
INDEPENDENT MEMBER

| | |
|--------------------|------------------|
| TERM START DATE | TERM END DATE |
| 2013 | 2017 |




Dimitrakis Potamitis
Member
INDEPENDENT MEMBER

| | |
|--------------------|------------------|
| TERM START DATE | TERM END DATE |
| 2013 | 2017 |



Igor Rusek
Member
INDEPENDENT MEMBER

| | |
|--------------------|------------------|
| TERM START DATE | TERM END DATE |
| 2013 | 2017 |



Konstantin Yanakov
Member**
INDEPENDENT MEMBER

| | |
|--------------------|------------------|
| TERM START DATE | TERM END DATE |
| 2013 | 2017 |

* In March 2017 and for the remaining term, Mr. Pavel Saroch was appointed B' Vice-Chairman, Non Executive Member and Mr. Pavel Horak Non Executive Member

** In March 2017, Mr. Robert Chvátal replaced for the remaining term the resigned member Mr. Konstantin Yanakov

II. OPERATING RESPONSIBLY

MEET OUR EXECUTIVE COMMITTEE



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.



Ian Catchick
Chief Product Officer

Ian joined OPAP in August 2016 having previously held key roles at Ladbrokes, most recently as International Digital Director, Gala Coral and Camelot, the operator of the UK National Lottery.



Rene Langen
Chief Development Officer

Rene joined OPAP in March 2016 having previously been a Senior Partner at McKinsey & Company in Athens responsible for telecommunication clients across Europe, Middle East and North Africa.



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.



Anny Ketentzoglou
Chief Legal Officer

Anny joined OPAP in March 2014 to reform and lead the Group's Legal Team. With 20 years of experience in senior roles, Anny's expertise covers a wide range of the legal spectrum in Corporate Law, Transactions, M&A and Antitrust law as well as in Public Law.



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 Telefonica 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.



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.

WE OPERATE A BOD ACCORDING TO HELLENIC CORPORATE GOVERNANCE CODE PRINCIPLES

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, taking 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. The BoD specifically has the authority to decide on the issuance of any kind of bonds, except of those that by law fall under the exclusive competence of the General Meeting of shareholders and can also decide on the issuance of bonds convertible into shares following decision of the General Meeting of shareholders and the provision of authorization to the BoD, in accordance with the provisions of Law no. 2190/1920, as in force.

The schedule of matters for the Board's decision within 2016 included 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.
- By virtue of the company's Articles of Association, the Board of Directors may consist of between seven and thirteen members, who are elected for four years.
 - The BoD composition is considered satisfactory since it is comprised in its majority of Non-Executive Members from various industries, nationalities and age groups.
 - Any issues relating to remuneration and the overall corporate remuneration policy is set by the BoD and the Remuneration and Nomination Committee. The fees and any other compensation paid to the Non-Executive Members are defined according to Codified Law no. 2190/1920 and are commensurate with the time they allocate to Board meetings and perform the duties

assigned to them pursuant to Law no. 3016/2002, as in force each time.

- Initial selection of BoD Members is conducted by the 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.
- The BoD oversees performance related to sustainability issues through the Integrated Management System (for quality, environmental and social responsibility management) and appoints a Member to cooperate with the responsible person for the Integrated Management System.



POLICY
TRANSPARENCY TO
INVESTMENT
COMMUNITY



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

WE HAVE DEFINED BOARD MEMBERS' RESPONSIBILITIES

We have clearly defined our Board Members' responsibilities, as outlined below:

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. In the past, both roles were entrusted by the Board and the General Assembly to one person, but the position and duties of the CEO were undertaken by Mr. Damian Cope on 01/07/2016, while Mr. Kamil Ziegler remained Executive Chairman of the BoD.

The Chairman presides over Board meetings, organizes and directs its work, as well as report on it to the ordinary Shareholders Assembly Meeting. The Chairman's competences are indicatively outlined below:

- Chair and ensure that Board meetings constitute a forum where open debate and effective contribution from individual Members are encouraged, with sufficient time allocated to 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 BoD complies with its obligations towards shareholders, the company, the supervisory authorities, the law and the company's Articles of Association.
- Where a resolution of the BoD is issued, he may also represent and bind the company.

CEO/Managing Director: 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.

II. OPERATING RESPONSIBLY

The CEO's competences indicatively include:

- Supervise company 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 make good use of employees and proposes that the BoD approves the drafting of new regulations and organizational charts.
- Approve employee recruitment, as appropriate.
- Define the company's strategic targets, in cooperation with the BoD and the Executive Management.
- Set the targets and KPIs and monitor the performance of the company's Management.
- Has the power to 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.
- Has the power to acquire and dispose of businesses and approve unbudgeted capital expenditure projects, subject, in each case, to a limit per transaction defined by the BoD.
- Has the power to represent and bind the company against third parties for signing of payment orders, bank checks, payment of salaries, insurance contributions, payment of taxes and fees of any nature to the State.
- Has the power to 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.
- In general, the CEO checks the company's day-to-day operations and supervises how each Unit performs its tasks.

If the Managing Director is absent or unable to perform his functions, he shall be replaced by a person appointed by decision of the BoD upon the Managing Director's recommendation.

Non-Executive Members: Non-Executive Members of the BoD do not perform executive or managerial duties, but contribute and help the BoD as follows:

- Constructively challenge and help to develop strategy proposals.
- If necessary, submit reports individually or jointly, separately from the BoD reports, to the Shareholders' Assembly Meetings.
- When appointed by the BoD, participate in BoD Committees or any other working group or ad-hoc committees formed from time to time and perform the duties assigned to them in such committees.
- Provide international and operational experience, knowledge and understanding of global financial issues, the sectors in which OPAP operates and challenges it faces.
- Managing conflicts of interest.



We have implemented an Integrated Management System (IMS) in accordance with international standards.

WE OPERATE BASED ON MANAGEMENT SYSTEMS

OPAP S.A. implements an Integrated Management System (IMS) in accordance with international standards, where each of the three sub-systems takes the structure and the requirements of other systems into account. Within the context of IMS, we use the following systems:

- ISO 9001:2008 Quality Management System, certified by Lloyd's Register Quality.
- ISO 14001:2004 Environmental Management System, certified by Bureau Veritas.
- SA 8000:2008 Social Accountability System, certified by Bureau Veritas.

It must be noted that within 2016:

- We recertified our systems according to ISO 9001:2008, ISO 14001:2004 and SA 8000:2008 standards.
- We trained a limited number of employees on the Integrated Management System, due to the Induction process's launch (in which it was incorporated) in December.
- We enhanced our performance management blue-print through new reporting systems.

WE OPERATE A NUMBER OF COMMITTEES

The Board of Directors is supported by a number of Committees, such as:

Audit Committee: The Committee consists of three Independent Non-Executive Members and is primarily established to assist the BoD to fulfill its oversight responsibilities for:

- The financial reporting process.
- The system of internal controls.
- The internal audit performance.
- The external auditor's appointment, remuneration and independence.
- The process to monitor compliance with laws and regulations and the Code of Conduct.

Remuneration and Nomination Committee: The Committee consists of a Non-Executive Member as the Chairman and the two Non-Executive BoD's Vice-Chairmen as members and:

- Decides the remuneration and benefits policy to attract, retain and motivate Executive Members and senior management, as well as major remuneration plans.
- Presents relevant proposals to the BoD.
- Recommends granting of share options under the existing share option plans.
- Considers the appropriate balance between fixed and variable remuneration and between short and long-term variable components of remuneration



II. OPERATING RESPONSIBLY

POLICY
BOARD
MEETINGS



Board meetings are conducted at least once per month and are structured to allow open discussion. If deemed necessary, BoD conducts additional meetings (including by telephone, video-teleconference or written resolution) to address specific matters.

SCHEDULED MEETINGS ATTENDED DURING 2016 (NUMBER)

| NAME | BoD presence | BoD representation | Audit Committee | Remuneration Committee |
|----------------------|--------------|--------------------|-----------------|------------------------|
| Kamil Ziegler | 12 | - | | - |
| Damian Cope | 6* | | | - |
| Spiros Fokas | 12 | - | - | 5 |
| Pavel Horak | 11 | 1 | - | 5 |
| Michal Houst | 12 | - | - | - |
| Dimitrakis Potamitis | 12 | - | 8 | - |
| Rudolf Jurcik | 11 | 1 | 8 | - |
| Igor Rusek | 11 | 1 | 8 | - |
| Christos Kopelouzos | 10 | 2 | - | - |
| Pavel Saroch** | 11 | 1 | - | 5 |
| Konstantin Yanakov | - | 12 | - | - |
| Marco Sala | 1 | 11 | - | - |
| Georgios Melisanidis | 1 | 11 | - | - |

Eight additional Meetings were held per rotation, in which all members participated.

*Starting from 23/06/2016, date of appointment as CEO.

**Starting from 02/03/2017, Mr. Pavel Horak was replaced by Mr. Pavel Saroch as B' Vice-Chairman.

Management Systems Committees: The Committees oversee all activities related to the company's management systems and:

- Establish OPAP's policy and substantiate corporate policies.
- Decide on any corrective and preventive actions.

- Recommend improvement actions to the BoD.
- Secure adequate resources (materials and services).

It consists of the following members, with possible participation of other representatives to support the Management Systems Department:

MANAGEMENT SYSTEMS COMMITTEES

| Position | Role | Quality Management Committee | Environment and Social Accountability Committee |
|--|--|------------------------------|---|
| Executive Member of BoD | Chairman / Top Management representative on Management Systems | ✓ | ✓ |
| Procurement and Quality Director | Member / Management Systems Representative | ✓ | ✓ |
| Organosis Director | Member | ✓ | X |
| IT Infrastructure and Operations Director | Member | ✓ | X |
| CRM Director | Member | ✓ | X |
| Contact Center Director | Member | ✓ | X |
| Rewards and Employee Relations Director | Member | X | ✓ |
| Facilities Management Team Director | Member | X | ✓ |
| Physical Protection Director | Member | X | ✓ |
| Director of Corporate Social Responsibility Department | Member | X | ✓ |
| Northern Greece Responsible | Member | ✓ | ✓ |

General and Specific Agent Issues: The Committee consists of an Executive Member, 5 Non-Executive Members and one representative of the Agents and is mainly responsible to evaluate issues related to agents' operations (such as license transfers, relocations and license removals).

COMPOSITION

| Position | Role |
|--------------------------|----------|
| Executive Member of BoD | Chairman |
| Chief Sales Officer | Member |
| OPAP Stores Director | Member |
| Lawyer | Member |
| Sales Operation Director | Member |
| Sales Support Manager | Member |
| Representative of Agents | Member |

II. OPERATING RESPONSIBLY

POLICY

BOARD MEMBERS' REMUNERATION REPORT



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.

The primary objective of the Remuneration and Nomination Committee is to assist the Board of Directors in carrying out its duties in the following areas:

- Ensures that there are adequate procedures for the evaluation of the Chairman's remuneration, of non-executive Board Members, of executive Board Members, of the ones that directly report to the CEO, of the Board Committees and of the Board as a whole.
- Ensures that the company adopts, monitors and implements appropriate policies and remuneration procedures.
- Ensures that disclosures regarding remunerations meet the disclosure objectives of the Board of Directors and of all relevant legal requirements.
- Evaluates candidates and proposes new members for the Board of Directors.

Our management team is multinational and adaptable and thus the main principles of our philosophy regarding remuneration are the following:

- Simplicity.
- Shareholder alignment.
- Remuneration by performance.

New remuneration regime: There has been a fundamental cultural shift in the company's remuneration approach:

- Prior to the privatization, the company's policy with regard to bonuses was based on the Collective Labor Agreement with no specific reference to individual performance. Post privatization, focus has shifted towards bonus schemes 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.



There has been a fundamental cultural shift in the company's remuneration approach

It is worth mentioning that bonuses and other variable remuneration arrangements is common practice for companies listed in the FTSE100 index. Research shows that 99% of executives working in index FTSE100 companies at the Executive Committee level and above has a ratio of variable to fixed remuneration in excess of 1: 1, whereas that is not the case in our company, which accepts as maximum a ratio of 1: 1 only for the position of CEO.

Performance considerations for 2016:

- Group Operating Profit, of €249 million, a decrease of 17.7% on 2016,
- GGR of €1,398 million, decreased by 0.2% versus last year
- Profit before interest, tax, depreciation and amortization (EBITDA) of €308 million, decreased by 18.5% versus last year

Although the annual financial targets were not met due to the increased GGR contribution from 30% to 35%, the Remuneration and Nomination Committee suggested to the BoD that a bonus is given to certain executives/ key members of staff due to exemplary performance. The BoD decided that the non-achievement of the annual targets cannot be attributed to the performance of the aforementioned executives/key members of staff and decided to suggest to the General Meeting to approve the provision of bonus.

Performance considerations for Long Term Incentive Scheme (LTIS) 2014-2016: On 1 July 2015, OPAP S.A. introduced a bonus incentive scheme aiming to function as a performance incentive for selected key managers and directors. The scheme provides that the participants will be remunerated in shares. The number of shares each participant will be entitled to will depend on the fulfillment of specified targets. The fair value of each share is valued at the grant date based on the value of each share and the probability that the aforementioned targets will be met.

The number of shares amounts totally to 406 thousand shares. The cost relating to scheme is recognized as payroll cost in the Statement of Comprehensive Income and as retained earnings in the Statement of Changes in Equity.

As far as the LTIS fulfillment is concerned, it must be noted that at the maturity date, 31/12/2016, none of the predetermined targets was met. More specifically:

- Cumulative Profit before interest, tax, depreciation and amortization (EBITDA) for the years 2014-2016, did not reach the targeted level mainly, due to the increased GGR contribution from 30% to 35% and the delay of VLT's project commencement.
- The market price of the OPAP share did not reach the targeted level not only because of the aforementioned factors but also due to the continuous underperformance of Greek stock indices pressured downwards by capital control and lengthy negotiations with creditors.

In conclusion, the Remuneration committee evaluated the LTIS as not fulfilled resulting into closing of the current program with no share distribution to management.

Remuneration Committee and Procedure: The Remuneration Committee is chaired by Pavel Saroch, and comprised by three Members. All the committee members are Non-Executive and considered independent from executive tasks (Pavel Saroch, Non-Executive Member and B' Vice-Chairman of the Board of Directors, Spiros Fokas, Non-Executive Member and A' Vice-Chairman of the Board of Directors, and Pavel Horak, Non-Executive Member of the Board of Directors), but not independent according to the full set of criteria of the Code. Their recommendations and reports were submitted to the Board for approval.



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.

Pavel Saroch,
Chairman of the Remuneration Committee
28th of March, 2016

II. OPERATING RESPONSIBLY

2. Risk Management

WE APPLY INTERNAL CONTROLS AND RISK MANAGEMENT SYSTEMS

System of Internal Controls: We maintain a system of internal controls, which includes:

- The Audit Committee.
- The Internal Audit (IA) Function, which is an assurance and consulting activity to ensure compliance with our policies and procedures, in order to improve the company's operational effectiveness. The IA Function helps the company accomplish its objectives and is responsible to:
 - Implement a systematic approach to evaluate the effectiveness of risk management, control and governance processes.
 - Recommend appropriate measures to improve their efficiency and effectiveness.
 - Monitor the implementation of corrective actions.
- The Security and Corporate Risks Management Division, to determine and develop security policies, corporate risk management system, as well as monitor their implementation.
- The Compliance Office, which monitors and ensures compliance with the applicable legal and regulatory framework, as well as the Internal Rules and Regulations, procedures and Code of Conduct.
- The Quality Systems Management Department, to plan, control and ensure the IMS's implementation in accordance with International Standards.

The IA Function initiates and coordinates the dynamic Audit Planning process, following an enterprise risk self-assessment process by the business teams, in order to develop a risk-based Annual Audit Plan. The final Plan is periodically re-evaluated and takes into account the actual Audit Engagements' progress, the actual resources availability and any material changes to the operating environment (i.e. new products, processes, units, systems). Within this context, we review:

- The Integrated Management System's effective implementation.
- Compliance with International Standards, such as WLA, ISO27001, ISO90001, PCI DSS, COBIT 5, IIA standards and ISAE3402.

In compliance with the current regulatory framework, the Internal Audit Division provides assurance to OPAP Management and to the BoD through the Audit Committee, as it reports:

- Within the first quarter of every year on the System of Internal Controls' adequacy and effectiveness.
- At least quarterly or whenever required by the Audit Committee on the Annual Audit Plan's execution and the major audit findings and recommendations, as well as any significant audit issues not yet remediated.
- On an ad-hoc basis for conflict of interests of Board

members or executives with the company's interests, which identifies during the exercise of their duties.

- The annual status of Internal Audit activities and coordination with the Risk Management and Compliance Functions, as well as the External Auditors.

Furthermore, the outcomes of internal quality audits are:

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

Following the results from over 25 internal and external audits conducted within 2016:

- All findings were taken into consideration and the appropriate departments and functions decided upon the design and implementation of corrective measures.
- Approximately 94% of the internal audit recommendations were implemented.

Risk Management: We follow a comprehensive annual enterprise wide approach to identify, measure and prioritize key risks that may affect the achievement of strategic objectives. The risk level is monitored through the major risk assessment process, which is facilitated by the Internal Audit and the Risk Unit, prior being presented to the Audit Committee and submitted to the BoD. The risk registry incorporates elements of the Internal Controls - Integrated framework (COSO model 2013) and includes risk categories such as:

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

MAIN RISKS AND UNCERTAINTIES

| Source | Description | Response and Practices |
|---------------------------------------|--|---|
| Adverse financial situation | Volatile macroeconomic and financial environment in Greece. | <ul style="list-style-type: none">• Adjustment of corporate strategy and objectives.• Review of actions taken to maintain undisturbed operations. |
| Change in regulatory requirements | Restrictions on growth opportunities, due to changes in betting activities, advertising regulations, compliance costs and taxes and introduction of new regulatory schemes. | <ul style="list-style-type: none">• Consistently comply with regulatory standards.• Effectively address and adjust to changing regulatory requirements.• Actively engage and maintain dialogue with key stakeholders. |
| Business strategy execution risk | <ul style="list-style-type: none">• Complete a large number of major initiatives in short time, in order to successfully complete our business plan.• Launch of Self-Service Betting Terminals (SSBTs), Virtual, VLTs, Digital re-platforming and product enhancements stretches business operations. | <ul style="list-style-type: none">• Establish dedicated project and product teams.• Develop and monitor KPI dashboards to identify early trends.• Monitor projects interdependencies and follow up high risk areas at Executive level. |
| Third-party management risk | Problems which may arise from relationship with existing and new vendors. | <ul style="list-style-type: none">• Frequently perform evaluation on Contract Terms and Service Level Agreements with providers.• Focus resources to properly prepare and deliver on-time new product, technology-enabled solutions. |
| Tax change risk | Changes to the existing gaming taxation status or gaming tax rates. | <ul style="list-style-type: none">• Promptly respond to any potential tax changes.• Maintain required tax planning resources.• Develop contingency plans. |
| Currency risk (foreign exchange risk) | Changes in investments' value, due to currency exchange rates. | <ul style="list-style-type: none">• Operations in Greece and Cyprus.• There are not any agreements with suppliers other than in euro.• All revenues from games are in euro.• Transactions and costs are denominated or based in euro.• Vast majority of Group's cost base is, either proportional to our revenues (i.e. payout to winners, agents' commission) or to transactions with domestic companies (i.e. IT, marketing). |
| Capital management | Capital may lose value, due to weak credit ability and capital ratios. | <ul style="list-style-type: none">• Adjustments to capital structure, in order to respond to changes in business and economic environment.• Decisions related to shares (i.e. adjust the dividend paid to shareholders, return capital to shareholders or issue new shares). |
| Risk from PAME STOIXIMA operations | The PAME STOIXIMA game is a fixed-odds betting game and winning depends on correctly guessing the results of sport-ing events. | <ul style="list-style-type: none">• Implement a risk management methodology at different stages of the sport-betting cycle.• Cooperate with most well-known odds compilers to create the initial odds of any available event.• At any given time, bets placed are tracked, received and are either accepted or denied. |
| Security risk | Breaches in security, such as illegal data retrieval, illegal data storage and accidental or intentional data destruction. | <ul style="list-style-type: none">• Implement several security measures to protect information technology system.• Security measures cover data processing system, software applications, data integrity and availability and online network. |

GOOD PRACTICE

ENSURING BUSINESS CONTINUITY



In order to ensure our uninterrupted operation, we:

- Have identified, classified and rated processes and information assets for their required recovery time and point objective, during our Data Asset inventory's development.
- Performed multiple tests of our core gaming systems' disaster recovery plans within 2016.
- Performed two emergency exercises in 2016, where all employees participated.

It must be noted that in 2016 there were:

- 100% of operations analyzed for risks which could result to a cease of operations by all Chief Officers of OPAP Group of Companies, who were facilitated from the Internal Audit Team.
- 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.

II. OPERATING RESPONSIBLY

3. Material Issues & Stakeholder Engagement

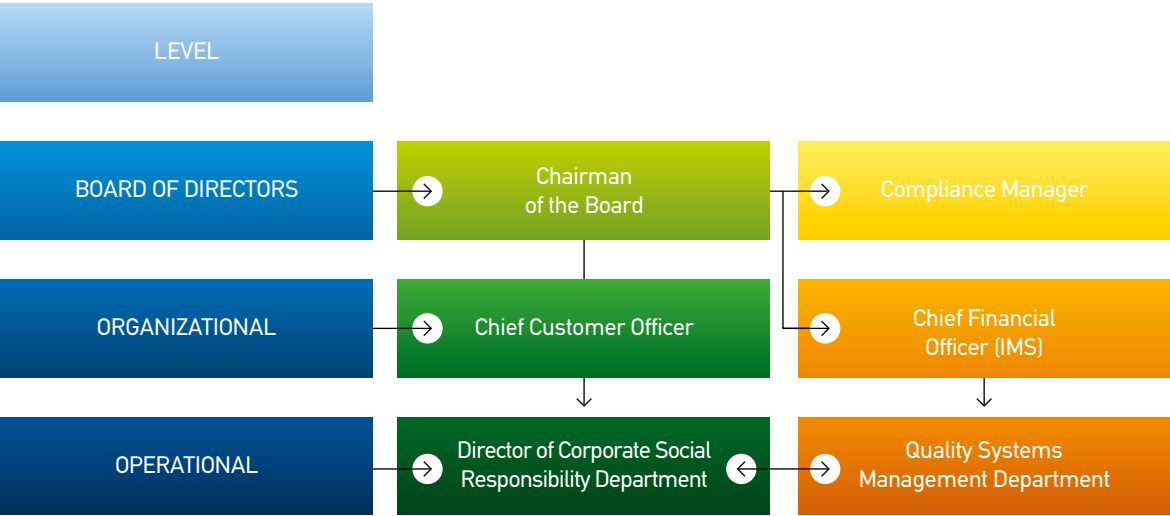
WE UTILIZE APPROPRIATE ORGANIZATIONAL STRUCTURES

OPAP adopts a holistic approach to Corporate Responsibility, where the accountability for responsible operation lies within each department and each employee, without being solely the responsibility of a specific department. Nevertheless, managing responsible operation issues overall, requires creation of appropriate organizational structures.

- At Board level, our Corporate Responsibility agenda is driven by the Chairman of the Board, while at organizational level the Chief Customer Officer is responsible to identify the strategic risks, set standards and targets and review performance regarding Corporate Responsibility.

- At operational level, the Director of Corporate Responsibility Department. is responsible to cooperate with other departments in order to diffuse responsibilities, policies and practices, and has established a close collaboration with the Quality Systems Management Department.
- At the same time, we have appointed specific executives, responsible for key issues such as Compliance, who coordinate and implement relevant programs and activities.

CORPORATE RESPONSIBILITY MANAGEMENT

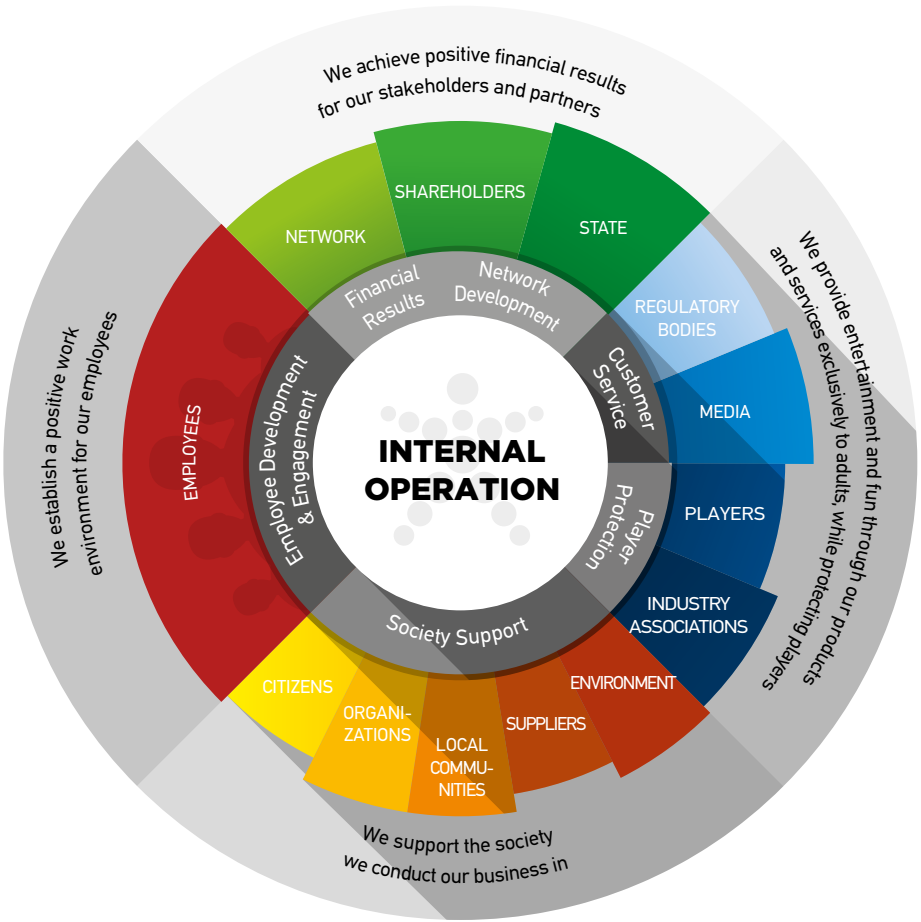


We adopt a holistic approach to Corporate Responsibility

WE IDENTIFY AREAS OF FOCUS

- Corporate Responsibility at OPAP is allocated at seven main areas, as derived through an internal analysis and dialogue with our stakeholders, which compose our Corporate Responsibility framework to systematically organize and manage all Corporate Responsibility issues.

CORPORATE RESPONSIBILITY FRAMEWORK



II. OPERATING RESPONSIBLY

WE IDENTIFY MATERIAL ISSUES

In each one of the areas of Corporate Responsibility, we recognize the Material Aspects, as a result of a four-phase process:

PHASE 01 SUSTAINABILITY CONTEXT

In the Sustainability Context phase, potential aspects were identified by reviewing future trends and current global industry practices.

PHASE 02 MATERIALITY ANALYSIS

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

- a)The potential significance of each aspect on our stakeholders.
- b)The potential likelihood of each aspect occurring.

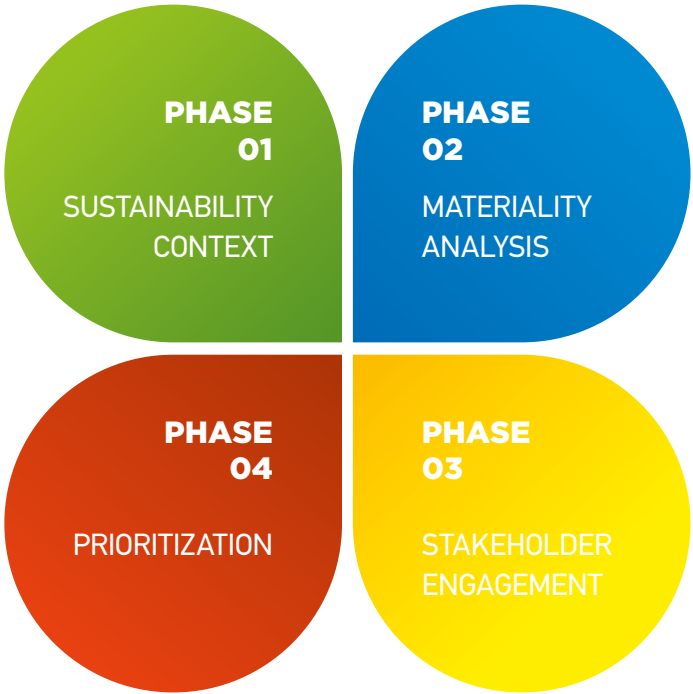
PHASE 03 STAKEHOLDER ENGAGEMENT

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

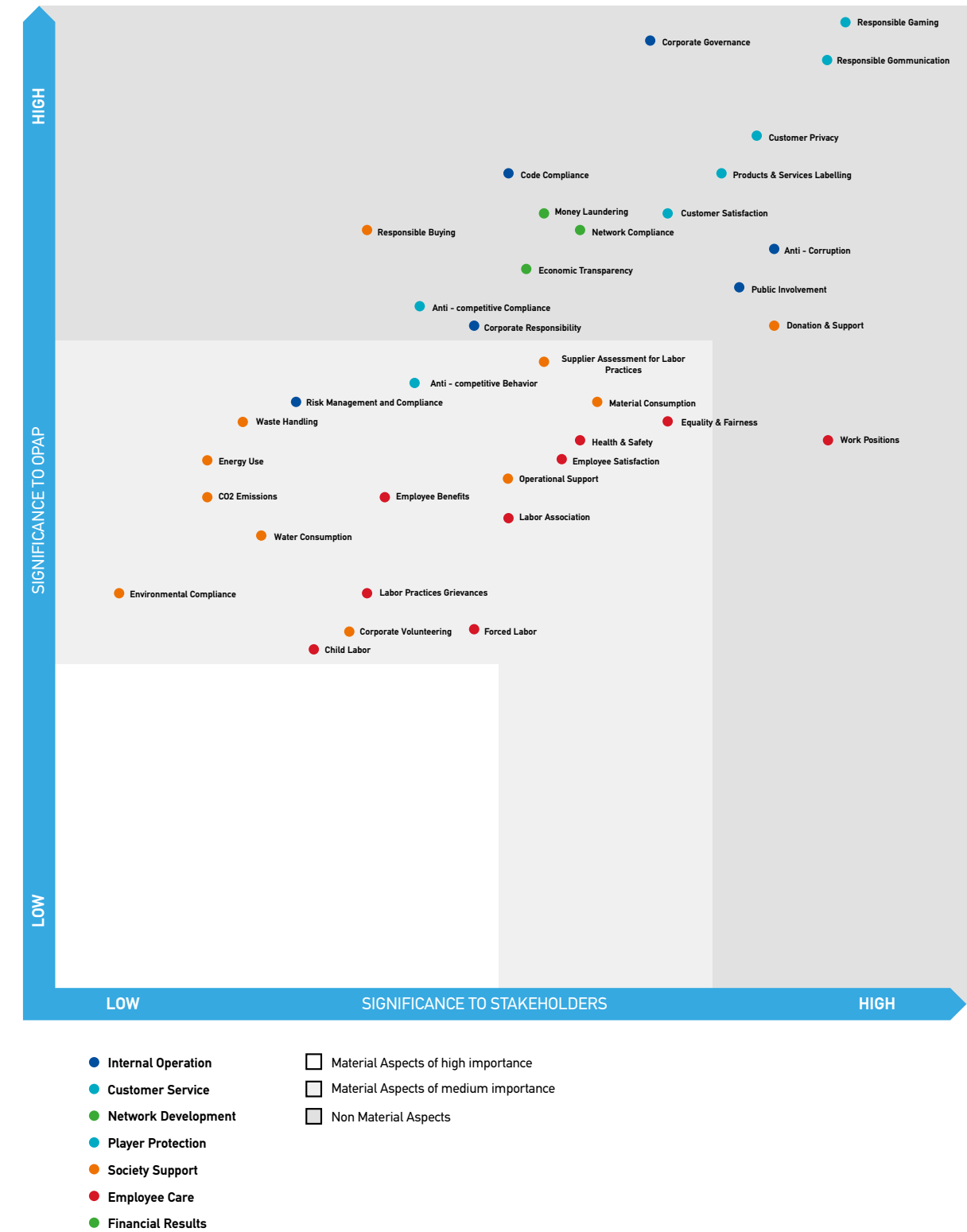
PHASE 04 PRIORITIZATION

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

Through this analysis, we have recognized these spect's for 2016.



CORPORATE RESPONSIBILITY MATERIALITY ANALYSIS

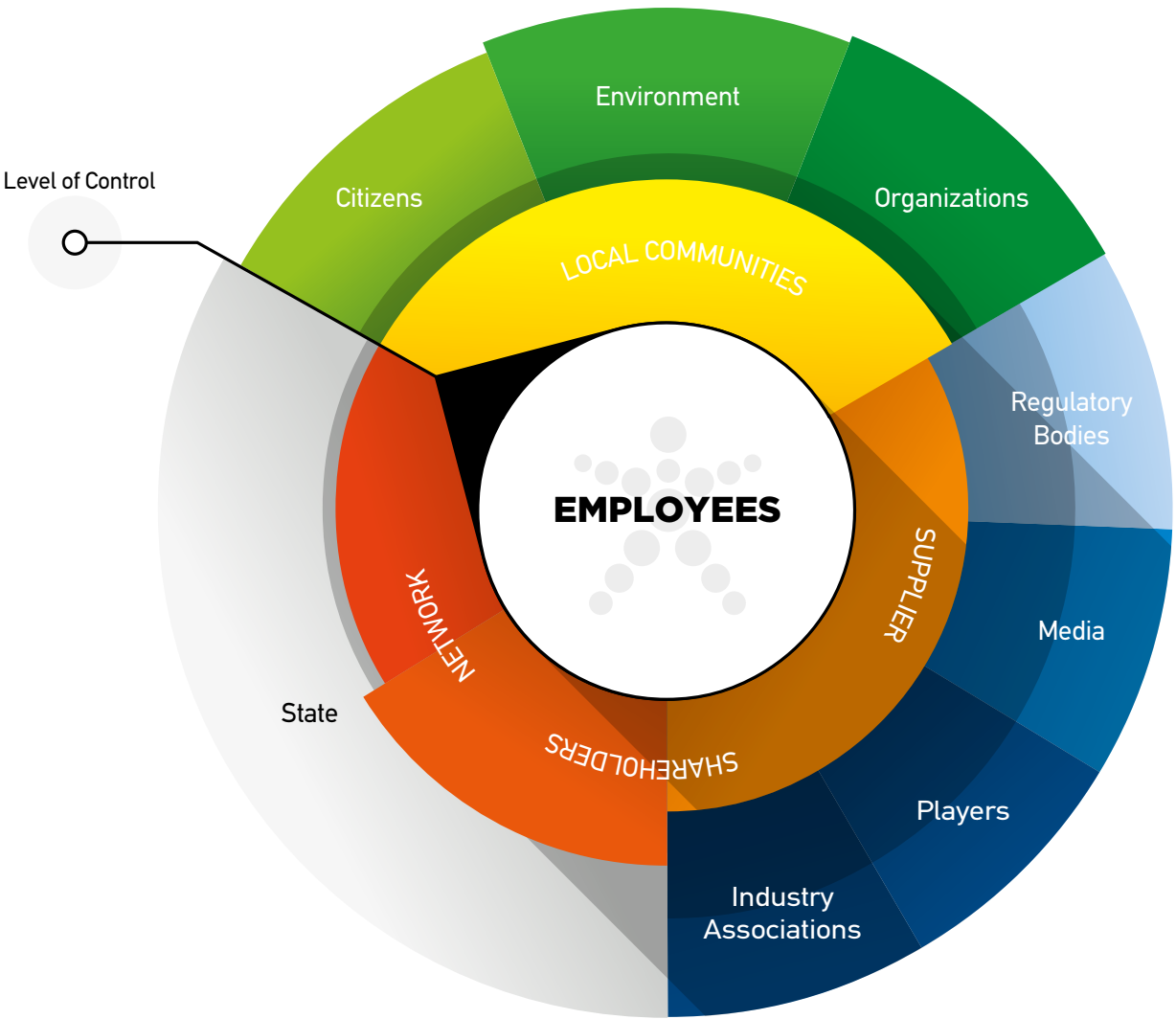


II. OPERATING RESPONSIBLY

WE INTERACT WITH OUR STAKEHOLDERS

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

STAKEHOLDER CATEGORIES



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

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

STAKEHOLDER ENGAGEMENT

| Stakeholder | Methods of interaction (daily or as required, unless otherwise stated) | Main Issues of interest | Response within the Report |
|--|---|---|--|
| Regulatory Bodies (e.g. Hellenic Gaming Commission) | <ul style="list-style-type: none">MeetingsPresentationsReportsRecommendationsCorrespondence | <ul style="list-style-type: none">Risk Management and Compliance (incl. applicable legal and regulatory framework)Customer PrivacyMoney LaunderingNetwork ComplianceResponsible GamingResponsible Communication (incl. compliance with Commercial Communication Regulation)Products and Services LabelingEconomic Transparency | Internal Operation: II-2 Customer Service: III-3 Network Development: IV-2, 4 Player Protection: V-1-2 Financial Results: VIII-1 |
| Players | <ul style="list-style-type: none">Surveys (annually)Points of SaleSocial mediaContact CenterAwareness campaignsWebsites (corporate, product and Responsible Gaming)Press ReleasesArticlesInterviews | <ul style="list-style-type: none">Customer SatisfactionCustomer PrivacyResponsible GamingResponsible Communication (incl. compliance with Commercial Communication Regulation) | Customer Service: III-2,3 Player Protection: V-1-2 |
| Network (Agents, Street Vendors, Retailers) | <ul style="list-style-type: none">MeetingsPresentationsTrainingsAwareness campaignsSocial mediaSales portalContact CenterResponsible Gaming materialProduct communication material | <ul style="list-style-type: none">Customer SatisfactionCustomer PrivacyMoney LaunderingNetwork ComplianceResponsible GamingResponsible Communication (incl. compliance with Commercial Communication Regulation)Economic Transparency | Customer Service: III-2,3 Network Development: IV-2, 4 Player Protection: V-1-2 Financial Results: VIII-1 |
| Suppliers | <ul style="list-style-type: none">Supplier evaluation (annually)MeetingsPersonal communicationPress releasesArticlesInterviewsSocial mediaContact Center | <ul style="list-style-type: none">Supplier Assessment for Labor PracticesOperational SupportResponsible BuyingEconomic Transparency | Society Support: VI-2 Financial Results: VIII-1 |
| Industry Associations (e.g. European Lottery Association, World Lottery Association) | <ul style="list-style-type: none">Written commitmentMeetingsFormal communication | <ul style="list-style-type: none">Anti-Competitive BehaviorAnti-Competitive ComplianceCustomer PrivacyMoney LaunderingNetwork ComplianceResponsible GamingResponsible Communication (incl. compliance with Commercial Communication Regulation) | Customer Service: III-1,3 Network Development: IV-2, 4 Player Protection: V-1-2 |
| Employees | <ul style="list-style-type: none">Employee engagement survey (annually)IntranetCorporate and social eventsInternal awareness campaignsInternal communicationTrainings/SeminarsPerformance Appraisal (annually) | <ul style="list-style-type: none">Code ComplianceWork PositionsEmployee BenefitsHealth and SafetyEquality and FairnessChild LaborForced LaborLabor AssociationLabor Practices GrievancesEmployee Satisfaction | Internal Operation: II-1 Employee Care: VII-1-3 |

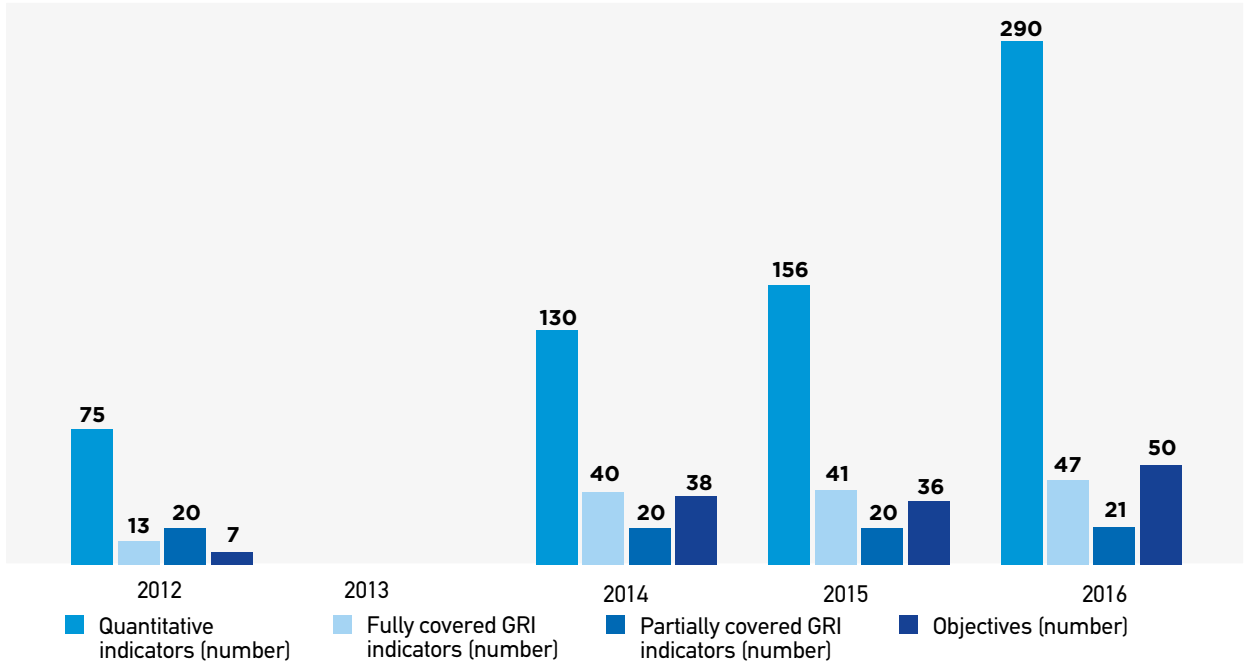
II. OPERATING RESPONSIBLY

| Stakeholder | Methods of interaction (daily or as required, unless otherwise stated) | Main Issues of interest | Response within the Report |
|--|--|---|--|
| State | <ul style="list-style-type: none">Attendance in organizations and associationsDiscussion with representatives at national and local levelWritten communication | <ul style="list-style-type: none">Corporate GovernanceAnti-CorruptionPublic InvolvementCorporate ResponsibilityAnti-Competitive BehaviorAnti-Competitive ComplianceMoney LaunderingNetwork ComplianceResponsible GamingResponsible Communication (incl. compliance with Commercial Communication Regulation)Economic Transparency | Internal Operation: II-1,3 Customer Service: III-1 Network Development: IV-2, 4 Player Protection: V-1-2 Financial Results: VIII-1 |
| Local Communities | <ul style="list-style-type: none">MeetingsWritten communicationLocal events | <ul style="list-style-type: none">Donation and SupportEnvironmental Compliance | Society Support: VI-1,3 |
| Citizens | <ul style="list-style-type: none">Surveys (annually)Contact CenterPress releasesArticlesInterviewsSocial mediaWebsites (corporate, product and Responsible Gaming)Communication campaigns | <ul style="list-style-type: none">Customer SatisfactionResponsible GamingResponsible Communication (incl. compliance with Commercial Communication Regulation)Donation and Support | Customer Service: III-2 Player Protection: V-1-2 Society Support: VI-1 |
| Organizations (e.g. NGOs, Institutions, Academic Authorities, Treatment Providers) | <ul style="list-style-type: none">MeetingsCollaborationsSurveysWebsites (corporate, product and Responsible Gaming)Social mediaWritten communication | <ul style="list-style-type: none">Anti-CorruptionPublic InvolvementCorporate ResponsibilityResponsible GamingResponsible Communication (incl. compliance with Commercial Communication Regulation)Donation and SupportEnergy UseCO₂ EmissionsMaterial ConsumptionWaste HandlingWater ConsumptionEquality and Fairness | Internal Operation: II-1,3 Player Protection: V-1-2 Society Support: VI-1,3 Employee Care: VII-1 |
| Media | <ul style="list-style-type: none">Press releasesInterviewsArticlesWebsites (corporate, product and Responsible Gaming)Press conferencesSpecial eventsMeetings | <ul style="list-style-type: none">All above | Internal Operation: II-1-3 Customer Service: III-1-3 Network Development: IV-1-4 Player Protection: V-1-2 Society Support: VI-1-3 Employee Care: VII-1-3 Financial Results: VIII-1-2 |
| Shareholders | <ul style="list-style-type: none">Annual Reports (annually)Quarter Reports (quarterly)Websites (corporate, product and Responsible Gaming)Road showsPress releasesMeetings | <ul style="list-style-type: none">All above | Internal Operation: II-1-3 Customer Service: III-1-3 Network Development: IV-1-4 Player Protection: V-1-2 Society Support: VI-1-3 Employee Care: VII-1-3 Financial Results: VIII-1-2 |

WE FOCUS ON QUANTITATIVE RESULTS

We aim to continuously present our activities and operations with qualitative and quantitative objectives and data (general indicators, as well as GRI indicators) within the Report. These objectives and indicators are used to evaluate our performance internally and can be also used by the stakeholders to review our performance.

QUANTITATIVE DATA WITHIN THE REPORT



ACHIEVEMENTS 2016 AND OBJECTIVES 2017

| WE SAID | PROGRESS | WE WILL | BY |
|--|----------|--|------|
| Upgrade our Integrated Management System in compliance with new versions of ISO standards (by 2018) | 0% | Upgrade our Integrated Management System in compliance with new versions of ISO standards | 2017 |
| Recertify our systems according to ISO 9001:2008, ISO 14001:2004 and SA 8000:2008 standards | 100% | Recertify our systems according to ISO 9001:2008 and ISO 14001:2004 standards. Establish OHSAS 18001 certification | 2017 |
| Train 70% of employees on Integrated Management System | 0% | Train 90% of new employees on Integrated Management System | 2017 |
| Finalize and approve the revised Internal Rules and Regulations | 100% | Update the approved Internal Rules and Regulations with organizational changes occurred after their approval | 2017 |
| Update performance management blue-print to reflect operational needs and build reporting team to support all channels | 100% | Continue to upgrade our reporting system | 2017 |

Engage ment



STRATEGIC
PRIORITY-2020 VISION

Embedding Customer obsession

OPAP is a consumer-facing business serving millions of customers. OPAP aims to be more customer-centric as a company. This will be achieved by understanding our customer better, increasing our internal focus and continuously responding to changing customer behavior.

III. SERVING OUR CUSTOMERS

| | |
|----------------------------|----|
| 1. MARKET RELIABILITY | 76 |
| 2. CUSTOMER SATISFACTION | 77 |
| 3. DATA PRIVACY & SECURITY | 82 |



III. SERVING OUR CUSTOMERS

1. Market Reliability

WE PROVIDE BASED ON FAIR COMPETITION RULES

The regulated gaming market in Greece consists of 12 operators, licensed by the Hellenic Republic: OPAP S.A., Hellenic Lotteries S.A., Horse Races S.A. and nine 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, which establishes a transitory regime. The Law also provides for a licensing procedure, which has not been implemented until now. As a result, no online gaming licenses have been issued according to Law no. 4002/2011.

In 2016, OPAP has not been served with any antitrust complaint or other legal action regarding anti-competitive behavior or monopoly practices, neither is OPAP aware of any sanctions being imposed upon OPAP on such grounds either.

It should be noted that in December 2016 Greek casinos brought against the Greek State and the Hellenic Gaming Commission (HGC) petitions before the Supreme Administrative Court (Conseil d'Etat) for annulment of the new VLT Regulation (published in the Government Gazette on 1 November 2016), alleging, among others, that such Regulation violates the EU competition and state aid law and the respective Greek competition law.

OPAP was notified of such cases by the Court in 2017 and intervened in the judicial proceedings by filing pleadings, showing that the arguments set out in the petitions for annulment are mistaken or false. The hearing has not yet taken place (expected in fall 2017).

WE MONITOR ILLEGAL GAMING

The company has established an internal and external mechanism for advice on ethical and responsible player behavior and report of illegal gaming sites, which constitutes a fundamental aspect of customer quality service.

- The line to report is 210-5798088 (24hrs) and 8018011414 (24hrs) and the respective email address is igo@opap.gr.
- The illegal gaming team reports daily and monthly the cases of illegal gaming sites identified and convicted to OPAP management.



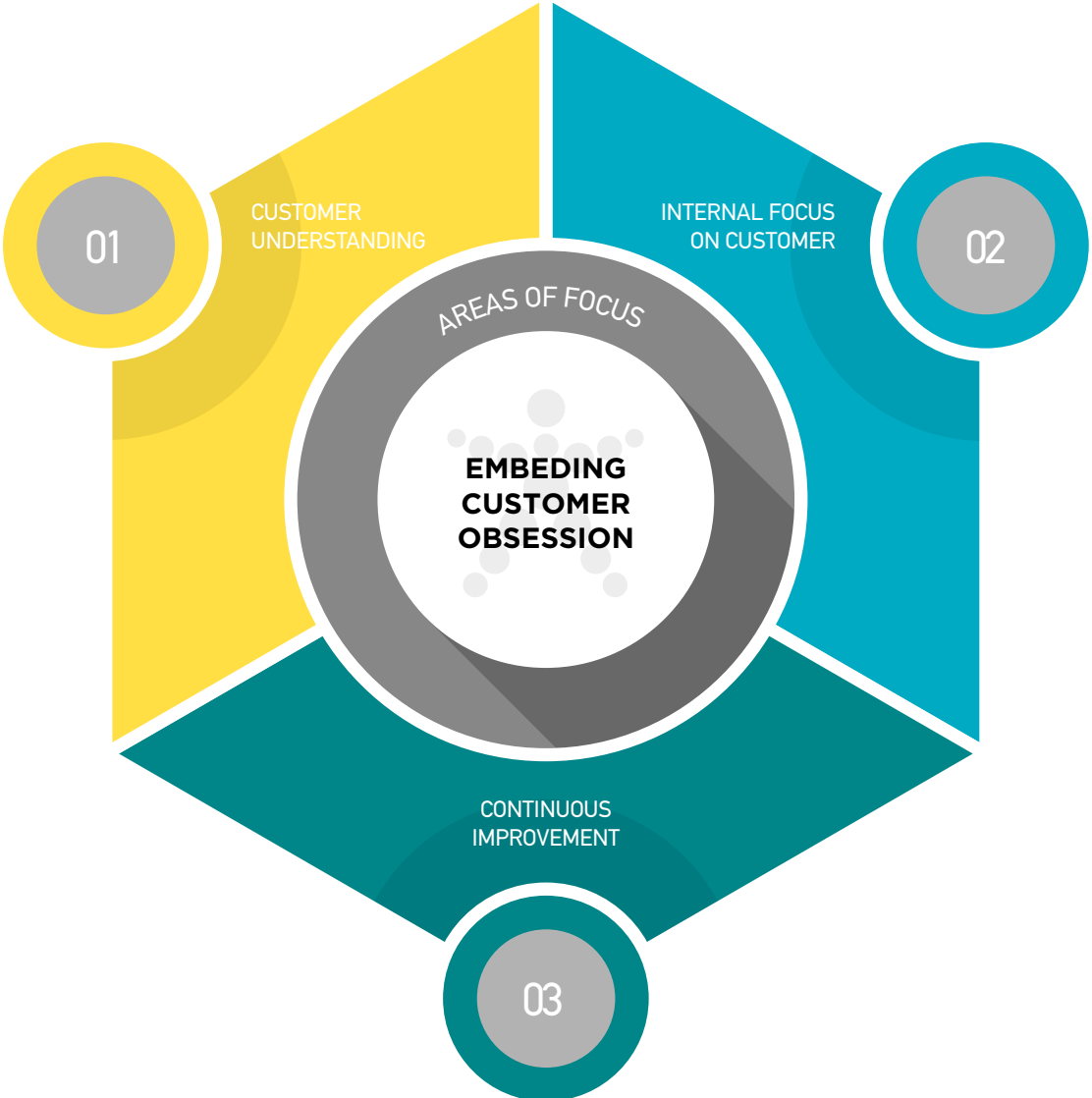
We have established an internal and external mechanism for advice on ethical and responsible player behavior and report of illegal gaming sites.

2. Customer Satisfaction

WE SYSTEMATICALLY MANAGE OUR CUSTOMER APPROACH

Customers have always been the center of our attention, as they are our motivation for everything we design and implement. As part of our efforts to systematically manage our customer approach, we have broken down this core strategic priority into the following areas, in order to

translate this huge concept in smaller, easier to address areas, which are tangible and manageable to all involved internal teams.



III. SERVING OUR CUSTOMERS

CUSTOMER UNDERSTANDING

Understanding our customers is the key to keeping them happy and create opportunities for the future and we therefore took action in specific areas, as we:

- Established a gap analysis to better monitor penetration and playing behaviors by gender and age (demo-graphic segmentation) and identification of gaps and opportunities on the existing games and/or new games, became a priority and was implemented during the previous year.
- Initiated formulation of a unified customer segmenta-tion, which will further optimize and enrich our custom-er understanding with more variables (demographic, behavioral, and attitudinal).
- Conducted over 80 regular and ad-hoc research studies in 2016, reaching 45,000 customers, in order to understand who they are, their drivers and barri-ers, monitor which games they play, as well as their satisfaction and dissatisfaction reasons. This led to using key learnings from on-going and ad-hoc studies across multiple teams, to remodel our games (i.e KINO and JOKER), launch new variants on SCRATCH as well as redesign operation processes that affect game availabili-ty (i.e. SCRATCH stock management in OPAP stores).
- Assessed game vendor responses for Loyalty schemes, selecting Novomatic (NLS) for the way for-ward.

INTERNAL FOCUS ON CUSTOMER

Changing the company's culture towards putting our customers in the spotlight, requires creating visible leadership, encouraging employee understanding of our customers, and reinforcing the message by sharing costumer focus examples that will motivate all OPAP team members. We therefore:

- Created a "Customer Team" division comprising of customer focused team such as Customer Relationships Management, Media & Communications, Corporate Social Responsibility, Customer Experience (Voice of the Customer and Contact Center), to ensure all OPAP products, services and touchpoints are aligned towards putting our customers in the center of everything we do.

- Included in the induction process, a session regarding OPAP's structure, teams activities and games portfolio, as well as two full days of visits to OPAP stores and Gaming Halls, to experience the atmosphere and actual games, a program which will be cascaded to all employ-ees in 2017.
- Established a research calendar, distributed monthly to all OPAP's C-level allowing participation in one of the 280 focus groups that took place in 2016, or attend research presentations. This gave the opportunity to key stakeholders to listen and learn from OPAP customers', first hand.



CONTINUOUS IMPROVEMENT

Our efforts to keep improving the quality of our customer insights and translating these into excellent customer experience is a never ending journey. We therefore:

- Expanded our official mobile application, OPAPP, by reaching 1,033,253 downloads in total since its launch, 501,533 of which occurred during 2016. In addition, there were over 30,000,000 scanned tickets, in order for the users to find out whether their slip won. Within the framework of continuous update and improvement of the application, we proceeded into more application updates which originated from customers' feedback.
- Strengthened our presence in all Social Media, by enriching it with interactive content for our Facebook pages, our Instagram account, our YouTube channel and our LinkedIn page. As a result, our Facebook Page is the #1 Greek page (in comparison to similar brands' Facebook pages) in terms of sum of interactions (350,000+), our PAME STOIXIMA Facebook Page is the #2 Greek page (200,000+ sum of interactions), while both Facebook Pages have reached over 5,000,000 Greek Facebook users.
- Designed initiatives such as customer dashboard, regular store visits and calls listening by employees, "Know your customer", "Customer Day" (regular meet-ings and interviews attended by OPAP top management and not only, with actual customers based on game, segment or other criteria), will achieve raising aware-ness and engaging people in the new strategy, in an interactive way.
- Centralized our complaints management process and social media management, since the second quarter of 2016 to ensure that our customers' voice is heard to OPAP through regular reporting and strict KPIs.
- Conducted the Customer and Partner Satisfaction monthly tracker, which is a monthly glimpse in their perception and experience, reaching in total approxi-mately 7,200 customers and 3,600 partners in 2016. This study allows us to monitor the impact of what we do on OPAP customers' and partners' satisfaction. The process is under constant review, in order to secure that we always receive the right level of detail to improve their satisfaction regarding our Brand, our games, our stores and our societal support activities.

WE SEEK TO SATISFY OUR CUSTOMERS' NEEDS

We strive to cultivate a reciprocal, sincere and trustful relationship with our customers, by offering responsible and quality products and services.

GOOD PRACTICE

QUALITY MANAGEMENT SYSTEM



OPAP S.A. implements a certified Quality Management System according to ISO9001:2008, in order to ensure that processes are managed in a systematic way.

The scope of the system includes all activities: design, development, administration, operation and manage-ment of gaming product and services. The system addresses in a systematic way:

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

III. SERVING OUR CUSTOMERS

WE MONITOR OUR PERFORMANCE

- To improve customer service, we:
- Have developed a centralized complaints management information system.
 - Monitor, on a monthly basis, the number of information queries and complaints, through our telephone center.
 - Monitor, on a monthly basis, the case handling efficiency (i.e. how long it takes to resolve a problem), for which we have set respective performance indicators.
 - Monitor, on a monthly basis, complaints regarding our agencies.

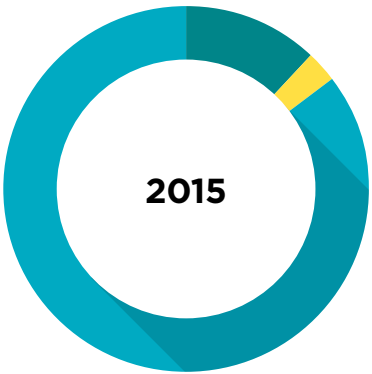


CONTACTS

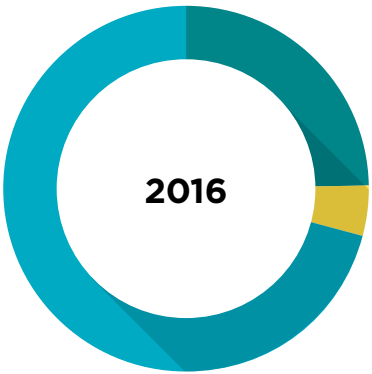
| | 2015 | 2016 |
|--|---------|---------|
| Total contacts (number) | 394,568 | 397,297 |
| Answered contacts (%) | 88 | 95 |
| Service Level (contacts answered in 30") (%) | NR | 77 |
| First contact resolution (%) | NR | 73 |
| Information (number) | 337,196 | 282,081 |
| Complaints received (number) | 9,051 | 20,796 |
| Complaints resolved (number) | 9,004 | 20,588 |
| Games (number) | NR | 9,611 |
| Horse Races (number) | NR | 2,835 |
| Live sports (number) | NR | 2,565 |
| Credit control (number) | NR | 2,886 |
| Tax winnings verifications (number) | NR | 1,474 |
| Tora Direct (number) | NR | 1,048 |
| POS operational issues (number) | NR | 159 |
| Complaints resolved within 1 working day (%) | NR | 96 |
| Average time to resolve complaints (days) | 0.7 | 1 |
| Average time to resolve quality complaints (days) | 1.2 | 1.5 |
| Post Call Satisfaction Index (%) | NR | 85 |
| Comments / private messages on Facebook responded within 3 hours (%) | NR | 80 |

NR: Not Reported

CUSTOMER CONTACTS CATEGORIES



- 85.5** Information (%)
- 2.8** complaints and negative comments (%)
- 11.7** Suggestions, positive comments and other (%)



- 71** Information (%)
- 4.3** complaints and negative comments (%)
- 24.7** Suggestions, positive comments and other (%)



III. SERVING OUR CUSTOMERS

3. Data Privacy & Security

WE ENSURE RELIABILITY AND TRANSPARENCY OF PRODUCTS AND SERVICES

The Reliability and transparency of our games' operation and provision of services to our customers are ensured by several security measures designed to prevent security breaches, such as illegal retrieval and illegal storage of data and accidental or intentional destruction of data.

Security mechanisms (online and offline)

Our information system ensures the integrity of data stored in our terminals and central database, as well as their flow via our network, through a priority security model at terminal, network and central information system level. An independent 'Audit Committee dealing with winners proclamation and objection trials for all games of OPAP S.A.', consisting of 15 regular and 15 alternate members (public servants), is responsible to monitor and verify the integrity and credibility of transactions for all OPAP's games processed by the Central System, declare winning tickets and evaluate any potential objections (not applicable for online betting, as there is no regulatory obligation).

Draw credibility in mechanical lottery machines

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

- An independent five-member Draw Committee (appointed by the Minister of Culture and Sports) to ensure the reliability of draws in LOTTO, PROTO and JOKER.
- A specific Draw Regulation (Joint Ministerial Decision no. 7905/27.02.2009 GG B' 430/10.03.2009), which describes all procedures to follow during the draws, as well as all the necessary corrective measures to apply in case of malfunction.
- Procedures to ensure the uninterrupted operation of all mechanical lottery machines used for draws.
- All draws are open to the public and are broadcasted live from a nationwide TV station.

Draw credibility in random number generators

Regarding draw credibility in games that utilize random number generators, the following 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.
- Electronic draws systems are located in secure areas, protected by special security and access control systems.

It must be noted that in 2016, there were no formal complaints by players regarding credibility of draws.

WE ENSURE PROTECTION OF PERSONAL DATA

The issue of personal data security is particularly important for serving the users of our products and services, as we carry out millions of transactions – payments each year. For this reason, we:

- Equip our agencies with terminals securely connected to our data processing center.
- Ensure that all critical processes occur via the central system.
- Issue a winning certificate, upon player request, according to HGC's Decision no. 129/2/07.11.2014 as currently in force and to the Games Organization, Operation and Conduct General Regulation (Ministerial Decision no. 2167/22.01.2009, GG B' 78) as currently in force. The winning certificate serves as a tax document for the player.

- Record a set of technical data, such as IP addresses and browsers used by our visitors, for statistical purposes and improve the level of services provided.
- Process online players' personal data only for the purposes for which they are collected, such as to provide online betting services.
- Do not disclose personal data to any third party, unless otherwise compelled by law.
- Apply all necessary measures to protect player's personal data in the context of high winnings payment and issuance of winning certificates.

- Use an information system for online gaming to ensure protection of data stored in terminal machines and central database.
- Comply with the Laws no. 2472/1997 and no. 2774/1999, as well as the Hellenic Data Protection Authority's Decisions, regarding our Data Collection and Management Policy.

As a result of our practices, we did not receive any formal complaint in 2016 regarding privacy issues or loss of personal data and no relevant fines were imposed by respective authorities.

ACHIEVEMENTS 2015 AND OBJECTIVES 2016

| WE SAID | PROGRESS | WE WILL | BY |
|---|----------|---|------|
| Set performance indicators for complaints handling | 100% | Achieve First Contact Resolution of 68% | 2017 |
| Resolve 85% of complaints received within 1 working day | 100% | Achieve ACR of 5% | 2017 |
| | | Increase Service Level (calls answered in 30") at 80% | 2017 |
| | | Increase Customer Satisfaction Index at 85% | 2017 |
| | | Launch a unified customer segmentation approach | 2017 |
| | | Launch initiatives for all employees to participate in focus groups and research presentations and prompt them to a more customer-centric approach in their everyday work | 2017 |
| | | Design and launch initiatives to strengthen customer engagement | 2017 |
| | | Form a Customer Experience Team, in order to further improve customer experience | 2017 |

Investment



2020 VISION
STRATEGIC PRIORITY

Investing In Our Network

OPAP aims to develop its stores to be the customer's local entertainment destination. Each shop acts as the heartbeat of every local community. OPAP will be investing in the shops themselves, introducing a number of new 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.

IV. DEVELOPING OUR NETWORK: INVESTING IN OUR NETWORK

| | |
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IV.DEVELOPING OUR NETWORK:

1. Investment & Transformation

WE RUN THE LARGEST COMMERCIAL NETWORK IN GREECE

Our distribution network is one of the largest exclusive commercial networks in Greece, as we offer the games we operate and the services we provide through 4,527 dedicated and branded agencies throughout Greece, while there are also 7,191 Points of Sale and street vendors to distribute Scratch tickets and passive lotteries.

The following table shows approximately the geographical distribution of our agencies.

GEOGRAPHICAL DISTRIBUTION OF AGENCIES



Data refer to 31/12/2016

WE INVEST IN OUR NETWORK

Our main objective is to continuously invest and develop our network, in order to stand close to our agents. As part of our clearly established development plan, we daily monitor each agent's performance separately and provide suggestions for actions and initiatives to enhance our offering and achieve our common goals. At the moment, we are able to 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.
- We select the right location and the proper store to accommodate all our products.
- We take into account our corporate identity rules and local restrictions.
- We create a modern agency from scratch.

Within 2016, there were 315 agency transfers, 189 agency relocations and 185 combined agency transfers

GOOD PRACTICE

REX TEAM

We strive to improve the way our agencies operate, in order to successfully achieve our '2020 Vision'. Since 2015, we have established the Retail Excellence Team to work together with our agents, in close collaboration with our Sales Representatives, in order to:

- Support agents to better promote our products and services.
- Improve customer service techniques.
- Disseminate good practices and provide guidance, in order to improve agency's image.

The efficient collaboration with the Retail Excellence Team has already proven positive impact on the agencies' remodeling and upgrade, as well as to their turnover, through various focus areas which include:

- Sales training for agents and their employees.
- Support agency improvements, in order to align with the corporate image.
- Proper and efficient products' promotion and availability of the relevant promotional material.
- Feedback to OPAP and strengthen trust relationships.

and relocations, for which we recorded an increase of 36% and 55% in the agencies' usable area for agency relocations and combined agency transfers and relocations respectively and an average increase of 25% in their turnover.

Furthermore, our distribution network has been subject to major efforts in recent years to upgrade its image, improve its functionality and enhance its infrastructure. The modernization of our network will be a critical success factor, in our attempt to highlight our improved game portfolio and the innovations we have introduced, as well as generate increased player traffic. Additionally, we plan to further widen our lottery and scratch cards distribution network, as well as their offering, with new and attractive ticket series in terms of design and payout ratio, in order to attract a diverse range of players.

It must be noted that, as of now, there were:

- 522 agents participated in the Retail Excellence program, with 18 million incremental turnover.
- Over 7,400 actions to improve games' promotion and over 2,900 actions to improve the agencies' image.
- 96% of agencies partially invested or completely renovated their agencies, according to our instructions.

Within 2016, we conducted a dedicated survey to a sample of 283 agents, in order to evaluate their collaboration with the Retail Excellence Team. The participation rate reached 84.1%, with positive results regarding the level of cooperation:

- 97.5% were more than satisfied with their cooperation.
- 95.4% believe that customer experience in the agencies has improved.
- 97.9% would recommend the cooperation with the Retail Excellence Team to another colleague.

IV.DEVELOPING OUR NETWORK:

2. Training

WE TRAIN OUR AGENTS AND THEIR EMPLOYEES

We provide various training programs to our agents, either at our premises or in broader areas of their agencies, depending on our training plan. During the past 2 years, we have created a sales training team to properly train our agents, in order to ensure their smooth operation. It must be noted that, if deemed necessary, employees from agencies and Hellenic Lotteries sales channels can participate in the training programs, such as:

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

Since May 2016, we offer a new series of one-day seminars for current agents, with a maximum number of 15-20 participants, in order to ensure the best possible experience. Additionally, we have created three new training venues in Athens, Markopoulo and Thessaloniki, as well as two new venues for training in Horse Races.

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 agency's agreement).

GOOD PRACTICE

MINORS PROTECTION



According to OPAP's Responsible Gaming Policy, all employees of OPAP agencies are obliged to require an ID card (or an equivalent document, such as passport or residence permit, clearly showing the date of birth), in case of any doubt, in order to prohibit participation in games of chance to minors. If the individual is identified to be a minor, agents and their employees must:

- Explicitly prohibit the minor's participation in OPAP's games of chance.
- Request minors to leave, in case they enter the agency.
- Point out the adverse consequences that may arise from their participation in games of chance.
- Immediately notify OPAP S.A. of such incident.



We conducted over 22,000 training hours to our sales network



We have informed 100% of our agents and trained 975 of them on principles and rules of responsible operation

We inform our agents about their responsible operation and make sure that they comply with OPAP's principles and rules, with all of them been informed on the principles and rules of responsible operation. Furthermore, OPAP Agents Policy on Responsible Gaming is available to all agents through the Agents' portal, with 88% of them signing and formally declaring that are aware of the Policy and we have distributed the Hellenic Lotteries Points of Sale Network Policy on Responsible Gaming to all distributors of Instant Win games and State Lotteries tickets. Additionally, within 2016, we:

- Trained 975 agents and agent's employees and 45 Points of Sale (wholesalers and distributors to cascade training to Point of Sale such as kiosks, mini markets and supermarkets) on responsible operation.
- Communicated Responsible Gaming messages to all agents, wholesalers and street vendors.
- Uploaded announcements on the Agents' portal, a dedicated online platform about Responsible Gaming for our agents and their employees.
- Conducted a network research survey in collaboration with the National and Kapodestrian University of Athens, with 700 telephone interviews to a random representative sample of OPAP agents throughout Greece, in order to identify their knowledge gaps and develop the content for a mandatory e-learning course to our network.

DID YOU KNOW

SYMPTOMS OF EXCESSIVE PLAYING



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

- Constantly think about games and find difficult to abstain from playing.
- Continue to play when losing, expecting to break even.
- Borrow money that they cannot afford to pay back.
- Have repeatedly tried to quit or reduce playing but with no success.
- Playing is a way to avoid their personal everyday problems.
- Believe that playing is an easy way to earn money.
- Risk losing their job or/and being isolated from their families.
- When in the process of playing less or when trying to quit, they become irritable and aggressive.
- Feel bad and become aggressive when losing.
- Reach a point where they face financial problems and are in debt.
- Commit illegal actions in order to continue playing.

GOOD PRACTICE

ASSISTING PLAYERS WITH PROBLEMATIC BEHAVIOR



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

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

Through OPAP's Responsible Gaming Training Program, agents and their employees are able to identify a player's problematic behavior, as well as provide advice to mitigate the consequences of excessive playing and respective treatment referral providers.

IV.DEVELOPING OUR NETWORK:

3. Support and Development

WE HELP OUR NETWORK GROW

We are committed to contribute to our network’s smooth and successful operation and support them through various initiatives, which include

Merchandising support.

Our Merchandising Team aims to optimize our sales network’s image and support their operations and business development, through:

Monthly visits to agencies for all product and service portfolio by OPAP, Hellenic Lotteries, Horse Races and Tora.

Monthly visits to Hellenic Lotteries’ Points of Sale.

Ad-hoc visits for games or program launches.

One-to-one meetings of Sales Representatives with agents in their agencies.

Automatic supply of SCRATCH tickets.

We have established a mechanism to automatically supply SCRATCH tickets to our agencies, in case their inventory drops below a predefined threshold, which generates the required amount and automatically send the order to the agency with a courier service. The mechanism informs the agent on the order through a SMS message, an e-mail and the OPAPNET portal.

Personal Service Consultant.

In order to strengthen the relationship with our network and improve our Retail Support’s service experience, we introduced Personal Service Consultants within 2016, who:

Track all requests made by the agent until they are completed and inform of any changes in advance.

Inform the agent for important company changes and developments.

Closely cooperate and contact the agent’s Sales Manager, in order to facilitate the agency’s day-to-day operations.

Enhance our Network communication through B2B portal “OPAPNET”.

The portal establishes a line of direct communication with our agents, in order to provide timely and accurate information regarding their operations. On average, we upload 68 announcements per month to OPAPNET portal, to which all agents are active users, with over 1



Within 2016 we introduced Personal Service Consultants

million recorded logins in 2016 and over 2,000 logged agents each day. The portal allows agents to:

Receive updated news related to our network.

Learn about our strategy.

Communicate directly with the Area Manager and the Retail Support Department.

Submit their applications electronically.

Quickly find a solution to any questions or issues within their agencies, through e-ticketing.

View daily Sales Reports.

Find updated material on operating policies, rules of Responsible Gaming, operating guides and other information to assist them in their agency’s day-to-day operation.

Automatic supply of SCRATCH tickets.

We have established a mechanism to automatically supply SCRATCH tickets to our agencies, in case their inventory drops below a predefined threshold, which generates the required amount and automatically send the order to the agency with a courier service. The mechanism informs the agent on the order through a SMS message, an e-mail and the OPAPNET portal. During 2016, 2,531 agents participated in the program and according to a 2016 survey:

80% of agents indicate that it clearly improved the right inventories for their agency.

67% believe that it simplified their work, as it is not longer required to waste time to keep track of their inventory or frequently place their phone orders.

SCRATCH ticket sales increased by 6.7%, compared to similarly rated agencies who have not applied the mechanism.

GOOD PRACTICE

GUIDES IN OPAPNET PORTAL



We have created a dedicated section in the OPAPNET portal to provide support, guidelines and suggestions to our network for their day-to-day activities, which features the following guides:

- The Operational Guide, with information and support on daily business topics, such as financial reports and communication forms, as well as supply and consumables.
- The Minimum Requirements Guide (Red Book), with the guidelines on the 24 minimum mandatory requirements which agents should cover, in order to comply with our network’s strategy, such as communication information, products’ availability, agency’s inside and outside image and proper games’ placement. Following the respective audits for compliance with the minimum requirements, in 2016 we rewarded through a draw the fully compliant agents, in order to strengthen our close relationship.
- The Best Practices Guide, with suggestions and best practices to improve customer experience and retention, as well as their turnover.
- The Technical Guide, with the appropriate technological equipment and connection of devices required for the agencies’ successful operation.

IV.DEVELOPING OUR NETWORK:

4. Compliance & Responsibility

WE DEPLOY RESPONSIBILITY TO OUR NETWORK

We demand from all our agencies neither to employ any person below the legal work age limit, nor to tolerate or disregard potential physical or other illegal harassment of any kind, or forced and coercive labor in any of their facilities. Additionally, we have:

- Have signed a new agent contract and agreed on a new cooperation framework with approximately 90% of our agents until 24/03/2017, which includes commercial and operational changes, as well as a new commission scheme based on Net Gaming Revenue.
- Launched two dedicated sections regarding Responsible Gaming and Corporate Responsibility in the OPAP-NET portal.
- Developed merchandising guidelines regarding Responsible Gaming materials and monitored their proper implementation.

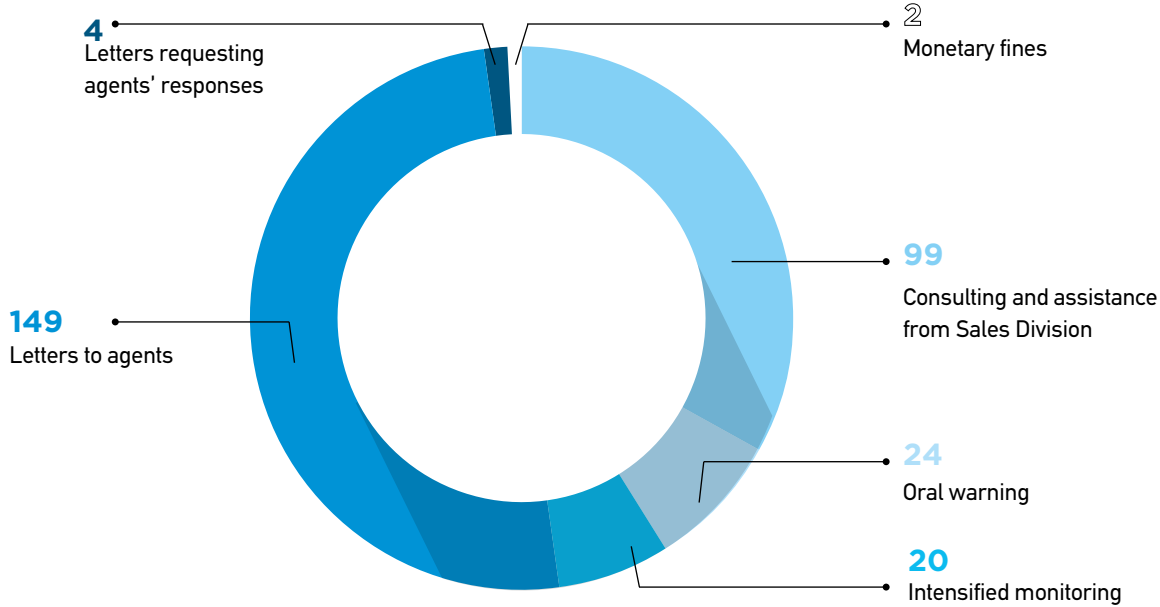
WE MONITOR OUR NETWORK'S PERFORMANCE REGARDING RESPONSIBLE GAMING

The successful launch and implementation of our Responsible Gaming practices and initiatives require from us to develop mechanisms to ensure proper compliance with the Responsible Gaming rules and principles. With in this context, we monitor our agencies' compliance with the basic rules of Responsible Gaming through on-site inspection visits, which include the following aspects, in order to promptly identify and handle cases of non-compliance within our network:

- Minors' entry within agencies.
- Minors' participation to the games of chance.
- Presence of Responsible Gaming mandatory materials.

In case an agent is identified as being non-compliant with its obligations in the above areas, OPAP reserves the right to suspend its license and terminate the agreement with the specific agent. Following the pilot launch of the inspection visits program, OPAP performed visits to 100% of its network within 2016, where 283 cases of non-compliance on behalf of our agents regarding their responsible operation were reported, which led to a total of 298 actions from OPAP, including monetary fines.

ACTIONS FOR NON - COMPLIANCE ON BEHALF OF AGENTS



GOOD PRACTICE
TACKLING MONEY
LAUNDERING AND
TERRORISM FINANCING



OPAP complies with 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.

The provisions applicable to the payment of winnings explicitly state that payments of gross profits before taxes over €1,500 per playslip, are only made through credit or payment institutions established and operating legally in Greece or in the European Union or in the European Economic Area and players are required to verify their identity by demonstrating their ID card or a valid passport or other document. Payments for gross profits before taxes between €200 and €1,500 per playslip, can be paid either through credit or payment institutions or with cash through an OPAP agent.

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

- Introduction: Purpose, Regulatory and Statutory Framework, Compliance with the Policy, Policy Governance, Annual Evaluation of AML Policy, Internal Notifications of the Policy
- AML Compliance Officer: Appointment, Duties, Reporting, Independence and Accessibility
- Internal Procedures: Risk Based Approach, Know your Customer (KYC), Payments of Profit
- Monitoring and Reporting: General, Suspicious or Unusual Transactions, Monitoring
- Reporting of Suspicious or Unusual Transactions: Dispatch of Reports to the Hellenic Financial Intelligence Unit (HFIU), Reported Players, Reported Cases, Internal Reporting, Protection of Reporting Persons
- Record Keeping
- Audits
- Employee & OPAP's Network Training

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



IV.DEVELOPING OUR NETWORK:

AML/CTF Audits: We conduct regular audits of information through our systems and on-site visits to our departments and network, in order to ensure their compliance with the Policy and the requirements of the regulatory framework. 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.

In 2016:

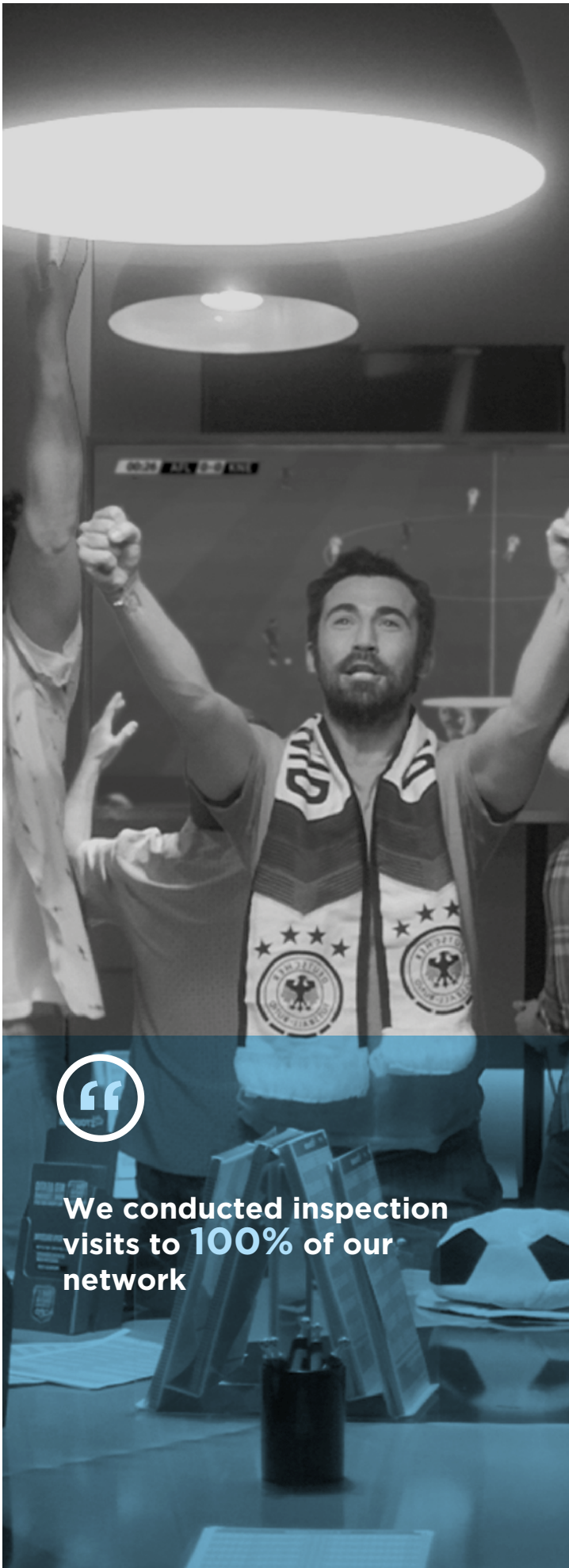
- We performed AML audit of 24,510 requests for winnings certificates.
- We introduced a digital platform through which all relevant requests are submitted and certificates are issued and downloaded by players, which significantly improved the efficiency of issuing process for winnings certificates.
- We identified violations of procedures for which the following sanctions were imposed:
 - 48 written warnings.
 - 4 monetary fines.
 - 1 termination of license.
- We reported 151 individuals to the HFIU for suspicious or unusual transactions.
- No sanctions or fines were imposed by respective authorities.

AML/CTF Trainings: We provide training courses on AML/CTF issues for our employees and agents on the following categories:

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

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

It must be noted that the AML Compliance Officer participated in a relevant training course in the first semester of 2016 and two Compliance Office members responsible for AML participated in a relevant training course in the second semester of 2016.



ACHIEVEMENTS 2016 AND OBJECTIVES 2017

| WE SAID | PROGRESS | WE WILL | BY |
|--|----------|---|------|
| Support the Go to market activities of the existing products and services portfolio | 100% | Introduce & establish New Contract & Commercial Policy | 2017 |
| Establish Retail Excellence team | 100% | Introduce & establish New Commission scheme | 2017 |
| Introduce personalized services through Contact center | 100% | Implement the rollout in the network of all the new products and services | 2017 |
| Introduce Special Central agreements with vendors for high quality products and services | 100% | Launch e-learning training platform for our sales network | 2017 |
| | | Accelerate the transformation of the network. Introduce new store design | 2017 |

Commitment



STRATEGIC
PRIORITY-2020 VISION

Committing to Our Communities

Our Company adopts and develops the highest standards of integrity and responsibility which are part of an integrated Responsible Gaming strategy.

V. PROTECTING OUR PLAYERS

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| 1.RESPONSIBLE GAMING | 98 |
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V. PROTECTING OUR PLAYERS

1. Responsible Gaming

WE FOLLOW THE PRINCIPLES
AND PRACTICES OF RESPONSIBLE
GAMING

GOOD PRACTICE

INTERNATIONAL
CERTIFICATION FOR
RESPONSIBLE GAMING

OPAP S.A. and Hellenic Lotteries S.A. acquired the Level 3 certification – with Level 4 being the highest – by the World Lottery Association (WLA) for applying Responsible Gaming principles into their daily operations, which demonstrates the successful application of Responsible Gaming programs and initiatives, in relation to the benefit and interests of all stakeholders.

OPAP S.A. and Hellenic Lotteries S.A. are the only Greek companies to acquire the Level 3 certification by WLA, which constitutes the greatest recognition for OPAP's consistent planning and implementation of Responsible Gaming principles, along with a clear confirmation of its commitment to protect players and the society in general.

In this context, OPAP continuously assesses its Responsible Gaming strategy and incorporates additional initiatives in its Responsible Gaming Action Plan, in order to acquire the Level 4 certification for OPAP S.A. and Hellenic Lotteries S.A.



We have been awarded
with **Level 3** certification
by the World Lottery
Association, for applying
Responsible Gaming
principles in our
daily operation



V. PROTECTING OUR PLAYERS

RESPONSIBLE GAMING FRAMEWORK

Responsible Gaming refers to a series of actions designed to protect the general public and especially vulnerable social groups from excessive gaming and prevent minors from any participation in games of chance.



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



Research

Understand Responsible Gaming and the problems related to excessive playing, as well as design the appropriate interventions, based on the respective results.



Employees

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



Sales Agents

Educate and support its retail network to comply with Responsible Gaming regulatory framework and the company's principles and rules, in order to create a safe environment where players can entertain themselves.



Game Design

Offer socially responsible products and incorporate Responsible Gaming principles in the design phase of new games.



Player Education

Undertake awareness raising campaigns to inform the general public about the two basic rules of Responsible Gaming, communicate the potential risks related to irresponsible participation to games of chance, as well as provide players with all data needed to make informed decisions, in order to protect minors and other vulnerable groups.



Remote Gaming Channels

Comply with Responsible Gaming rules for the PAME STOIXIMA game and develop online self-limitation, self-exclusion and self-evaluation tools, in order to prevent excessive play and forbid minors' access to games of chance.



Advertising and Marketing

Comply with the provisions of the applicable legislation on advertising games.



Treatment Referral

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



Report and Measure

Annually report on commitments undertaken, activities carried out and results achieved.



Stakeholder Engagement

Develop working relationships with key stakeholders, exchange information and improve all elements of Responsible Gaming.

POLICY

RESPONSIBLE GAMING POLICY



OPAP has developed Responsible Gaming Policies for OPAP S.A. and Hellenic Lotteries S.A., which define all necessary measures to minimize the potential negative impact from participation in games of chance and addresses 3 main target groups:

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

Within their overall Responsible Gaming Policies, OPAP and Hellenic Lotteries have launched the following distinct policies:

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

V. PROTECTING OUR PLAYERS

WE DEPLOY RESPONSIBLE GAMING WITHIN OUR OPERATIONS

Research

We aim to implement a systematic approach in order to conduct and document research, disseminate information and integrate the principles of Responsible Gaming into our daily operations.

Stakeholder Engagement

Building strong working relationships with key stakeholders is a critical factor in the success of the Responsible Gaming framework, in order to promote Responsible Gaming and encourage a better understanding of the gaming's social impact.

GOOD PRACTICE
INTERVENTION
PROGRAM



Within 2016, OPAP continued its educational intervention program titled 'Youth Power' that addresses pre-teen-age children. During the 2016-2017 school year, approximately 2,721 children of 5th and 6th grade participate in the program, which utilizes an experiential approach, 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.
- Strengthen children's positive thinking.
- Promote healthy life choices.
- Provide the necessary information to protect themselves from the aforementioned risks.
- Sensitize parents and teachers.

As of now, OPAP has:

- Trained 148 primary schools teachers from 71 school units of Attica, Thessaloniki and Ioannina.
- Presented the program in 9 conferences, with 1,800 participants.

GOOD PRACTICE
ENGAGING
WITH VARIOUS
STAKEHOLDERS



Within the context of its Responsible Gaming activities, OPAP presented within 2016 its Responsible Gaming strategy to the Hellenic Gaming Commission and journalists and engaged and collaborated with various stakeholders, who include among others:

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

Within 2016, OPAP has supported 5 Responsible Gaming activities, such as:

- The '9th State of the Art Adolescent Medicine Course' conference, organized by the Children's Hospital 'Panagiotis & Aglaia Kyriakou' and the Hellenic Association for Adolescent Medicine, in collaboration with the NGO 'Together for Adolescent Health', with 830 participants.
- The educational intervention program 'Youth Power', in collaboration with the Adolescent Health Unit of the Children's Hospital 'Panagiotis & Aglaia Kyriakou'.
- The Help-line 1114 by KETHEA-ALFA.

Remote Gaming Channels (online gaming)

We monitor players' participation in online betting for OPAP S.A.'s games (not applicable for Hellenic Lotteries S.A., as it does not offer any online games):

- We utilize https (hypertext transfer protocol secure) for secure communication over a computer network, which is designed to withstand attacks that aim to gain access to accounts and sensitive information.
- We provide all necessary information on game odds in our betting website www.pamestoixima.gr.
- We only allow people above 21 years old to register and use our betting website www.pamestoixima.gr. 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) by:
 - Visit an OPAP agency and carry their identification documents with them.
 - Use the players' IBAN number, which is operated by Interbanking Systems S. A. (DIAS S.A.), the national payment system of Greece.
 - Send a phone or a public utility bill with the player's name on it.
- We always verify a player's email address, prior to verifying his/her electronic account.
- We allow only one account per user.
- We only allow people with internet access from within the Greek territory to participate in our betting website.
- We have set a maximum total deposit amount of €800 per player, which no player can exceed before their verification.
- We allow a maximum amount of €1,200 per bet for pre-game betting and €600 for live betting, from all online players.
- Players can see their betting activity in detail (e.g. winnings and losses, deposits).
- Players are able to regulate their betting experience, as they can apply limits to participate in our online betting services (e.g. set the maximum amounts that can be deposited per day, week or month, set their maximum betting amount per day).
- Players can set their playing limits of their choice.
- In case players request a deposit limit increase, at least 24 hours have to elapse before the request can be implemented. However, in case players request to decrease their deposit or playing limits, this can be done

instantly.

- Players can choose to take a break from participating in online gaming for a short period of time, such as 24 hours (temporary exclusion period).
- Players can request for a temporary or permanent exclusion from participating in online gaming (temporary exclusion cannot be valid for a period of less than one month and in permanent exclusion players can re-register after their accounts have been closed for one year), with OPAP deactivating their accounts.
- We inform self-excluded players about treatment referral.
- Players with problematic behavior are immediately informed about the self-exclusion and/or the limits setting option.
- 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 do not allow players to register with a new account or connect to the Gaming system, in case they are listed on it.
- We investigate all accounts opened, in order to avoid the possibility that players requested for self-exclusion have opened a new account.
- Players can also request to close their electronic account whenever they want.
- We do not send marketing material to players who are temporarily or permanently self-excluded from participating in online gaming.

It must be noted that in 2016, there were no cases of online breaches and no cases of lost usernames or passwords were reported.

V. PROTECTING OUR PLAYERS

Employees

We inform and educate our employees about Responsible Gaming, in order to ensure their compliance with the principles and rules of Responsible Gaming.

All our employees have been informed about our Responsible Gaming strategy and we have implemented awareness raising campaigns to inform them about the basic rules of Responsible Gaming, as well as our respective achievements. Additionally, within 2016, we:

- Provided regular informative updates regarding Responsible Gaming.
- Conducted an online survey to assess our employees' knowledge regarding Responsible Gaming with 342 participant employees, in order to identify knowledge gaps and accordingly build the Responsible Gaming training program.
- Incorporated relevant trainings in our annual Responsible Gaming Action Plan.
- Informed all our employees (including new hires) about our Responsible Gaming Policy, which is also available in our intranet.
- Designed the content of online training courses in collaboration with the National and Kapodestrian University of Athens, in order to be aware of the Responsible Gaming strategy, priorities and regulatory framework, as well as targeted training sessions to specific departments, such as our Contact Center.
- Cooperated with the Mental Health Research University Institute (UMHRI) and the A' University Psychiatric Clinic in Aiginiteion Hospital for training activities to OPAP's and Hellenic Lotteries' employees, in order to promote Responsible Gaming and ensure compliance with the New Code for Gaming and the responsibilities towards the Hellenic Gaming Commission.
- Included a dedicated Responsible Gaming section in our Induction Process, during which we present our Responsible Gaming strategy and the basic principles and rules of Responsible Gaming.

- ciples and rules of Responsible Gaming.
- Conducted a specialized training course for our trainers and Contact Center on the appropriate techniques to support people who face problems due to excessive play and how they can perceive a person who faces problems due to irresponsible participation in games.



We informed **100%** of our employees about the Responsible Gaming principles and rules

Sales Agents

The contractual agreements with agents include a number of clauses, which refer to their responsible operation (for details please refer to Section IV-2).

Report and Measure

We have developed information gathering procedures that allow us to effectively manage and implement our Responsible Gaming activities.

claimer of the HGC.

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

WE PROVIDE INFORMATION TO PLAYERS

We comply with all labelling legal requirements to sensitize the general public, players and their relatives regarding the potential consequences associated with irresponsible participation in games of chance, provide useful guidance to players and inform everyone about how they can receive practical support or information, as indicatively mentioned below:

- All our agencies have clear labeling which indicates that participating in games is only allowed to players over 18 years old and encourage players to play within their limits.
- All our agencies distribute information material regarding Responsible Gaming and operate a Responsible Gaming informational 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 Hellenic Gaming Commission), the legal age limit, the KETHEA - ALFA helpline number (1114), as well as the adverse consequences that may occur due to irresponsible participation to 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) have the disclaimer of the HGC.

WE EDUCATE PLAYERS TO PLAY RESPONSIBLY

We provide players with all necessary information related to games, so that they can decide if they will play and select how to play, according to their personal choices and their background.

In-store Communication

We developed special stickers for the agency's entrance to inform about the age limit to participate in games of chance and posters for our agencies to inform about the basic rules of Responsible Gaming, as well as issued a Responsible Gaming informative brochure, which addresses issues such as:

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

V. PROTECTING OUR PLAYERS

Player Self-Check
Within the leaflet, OPAP has included a self-assessment questionnaire, based on the Canadian Problem Gambling Index, in order to help players identify if they face an issue with excessive play.

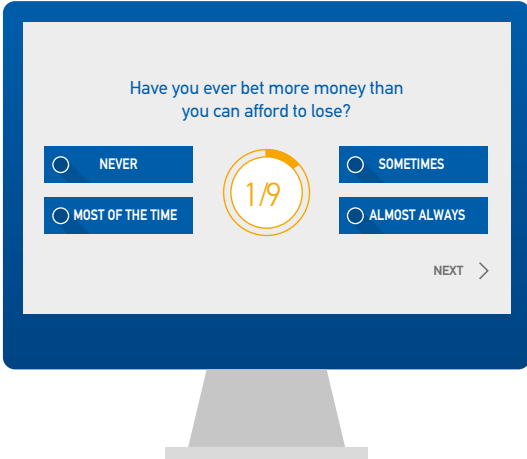
An interactive version of the questionnaire is also available at <https://somethingbetter.gr/en/responsible-gaming-app/our-commitment/do-you-play-for-the-game/>, featuring nine easily understandable questions, as well as characters and animations. Upon completing the questionnaire, the player can see the total score based on how correct answers are to the questions asked, which indicates the level of control during gaming.

- Website Information**
OPAP has created a dedicated section about Responsible Gaming in its Corporate Responsibility website (<https://somethingbetter.gr/en/responsible-gaming-app/our-commitment/strategic-approach/>), which provides relevant information and informs the general public, structured around the following sections:
- Strategic Approach.
 - Main Rules of Responsible Gaming:
 - Don't play unless you're at least 18 years old.
 - Don't play online unless you're at least 21 years old.
 - Don't exceed the limits you've set for yourself.
 - You are prohibited to play in VLTs if you are younger than 21 years old or self-excluded.
 - Responsible Advertising.
 - Responsible Sales Network.
 - Do you play for the Game', which includes the player's self- assessment questionnaire.
 - Support Program.

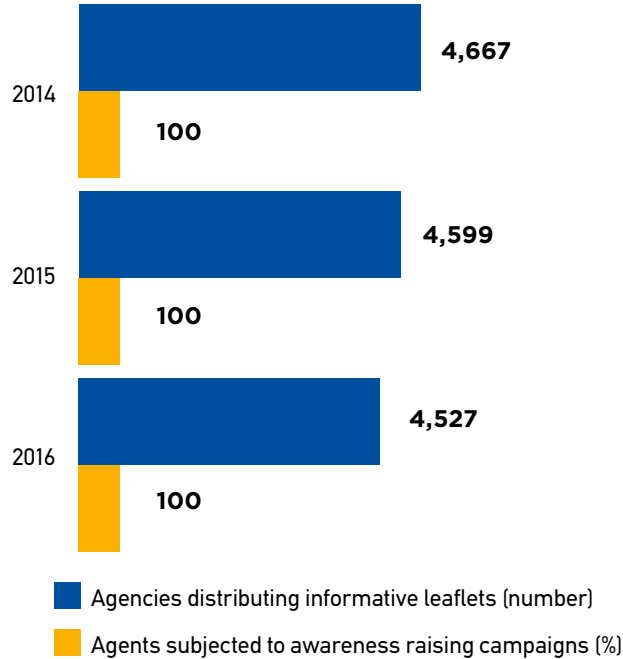
Similarly, Responsible Gaming messages and relevant information have been incorporated in all company websites, which also refer to our dedicated Responsible Gaming section.



Mobile Application
OPAP has also included a dedicated Responsible Gaming section in its OPAPP mobile application, where players can be informed about the Responsible Gaming principles and the KETHEA - ALFA help-line number (1114).



RESPONSIBLE GAMING AWARENESS



As a result of our practices, in 2016 there were no cases of non-compliance with laws and regulations concerning the provision and use of our products and services, while no relevant fines or other sanctions were imposed by the relevant authorities.

V. PROTECTING OUR PLAYERS

2. Responsible Advertisement

WE ADVERTISE OUR PRODUCTS WITH RESPONSIBILITY

GOOD PRACTICE

ADVERTISING AND CORPORATE COMMUNICATION



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

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

Within this context, we have informed all our collaborators for our campaigns and communication activities on what they communicate regarding Responsible Gaming

- Do not offer illogical incentives in order to attract more players with the promise to win anyway.
- Describe in a clear way that profit is purely a matter of chance.
- Do not convey the message that playing is a way of getting rich or a way out of financial difficulties.
- Do not offend ethics and traditions and do not encourage racial discrimination or any discrimination regarding ethnicity, religion, gender or age.
- Do not associate playing with use of substances and do not involve violence, sexual exploitation or illegal conduct.

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

- As a result of our practices in 2016, there were:
- No cases of campaigns being withdrawn after release.
 - No cases of non-compliance with regulations and voluntary codes concerning advertising and marketing communications, product and service information and labeling.
 - No relevant fines or other sanctions were imposed by respective authorities.

OPAP is fully compliant with HGC's Decision no. 163/4C/09.07.2015 (GG B' 1824) 'Regulating gaming commercial communication issues', as amended and consolidated by Decision no. 184/3/12.11.2015 (GG B' 2487), which defines the principles for gaming operators' communications, promotion, marketing and advertising activities and, generally, every aspect of commercial communication.

- Some of the main issues are:
- Do not target high risks groups through advertising and marketing activities.
 - Do not mislead the public about the odds of winning and the amounts that can be won.

GOOD PRACTICE

TREATMENT REFERRAL PLAYER HELP-LINE



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

The line is supported by OPAP (making it the only company in Greece that supports a help-line related to excessive play issues), operates Monday-Friday from 09:00-21:00 and is staffed by dedicated professionals. Within 2016, there were 1,392 calls made to the help line, compared to 1,144 calls in 2015.

OPAP receives from KETHEA monthly reports with statistical data about the help-line'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.

•



V. PROTECTING OUR PLAYERS

ACHIEVEMENTS 2016 AND OBJECTIVES 2017

| WE SAID | PROGRESS | WE WILL | BY |
|---|----------|--|------|
| Acquire the 4th Level WLA certification regarding Responsible Gaming for OPAP (by 2018) | 25% | Acquire the 4th Level WLA certification regarding Responsible Gaming for OPAP | 2018 |
| Acquire the 4th Level WLA certification regarding Responsible Gaming for Hellenic Lotteries (by 2018) | 25% | Acquire the 4th Level WLA certification regarding Responsible Gaming for Hellenic Lotteries | 2018 |
| Conduct an employee survey regarding Responsible Gaming | 100% | Design and launch an e-learning training course for employees and agents on Responsible Gaming | 2017 |
| Prepare a training program about Responsible Gaming for employees and agents | 100% | Develop an e-learning training program about Responsible Gaming | 2017 |
| Launch the pilot phase of the intervention educational program in public and private schools | 100% | Continue our educational intervention program "Youth Power" | 2017 |
| | | Assess our Responsible Gaming strategy by an external partner | 2017 |
| | | Incorporate Responsible Gaming into our Induction program | 2017 |
| Place new communication materials in Points of Sale, according to the merchandising guidelines and the regulator's requirements | 100% | Run an awareness raising campaign to communicate the basic rules of Responsible Gaming | 2017 |



Commitment



2020 VISION
STRATEGIC PRIORITY

Committing to Our Communities

OPAP understands that it has an important role within the communities in which it operates, targeting to the creation of long-term, meaningful benefit so as the company contributes to building a brighter future.

VI. SUPPORTING OUR SOCIETY

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VI. SUPPORTING OUR SOCIETY

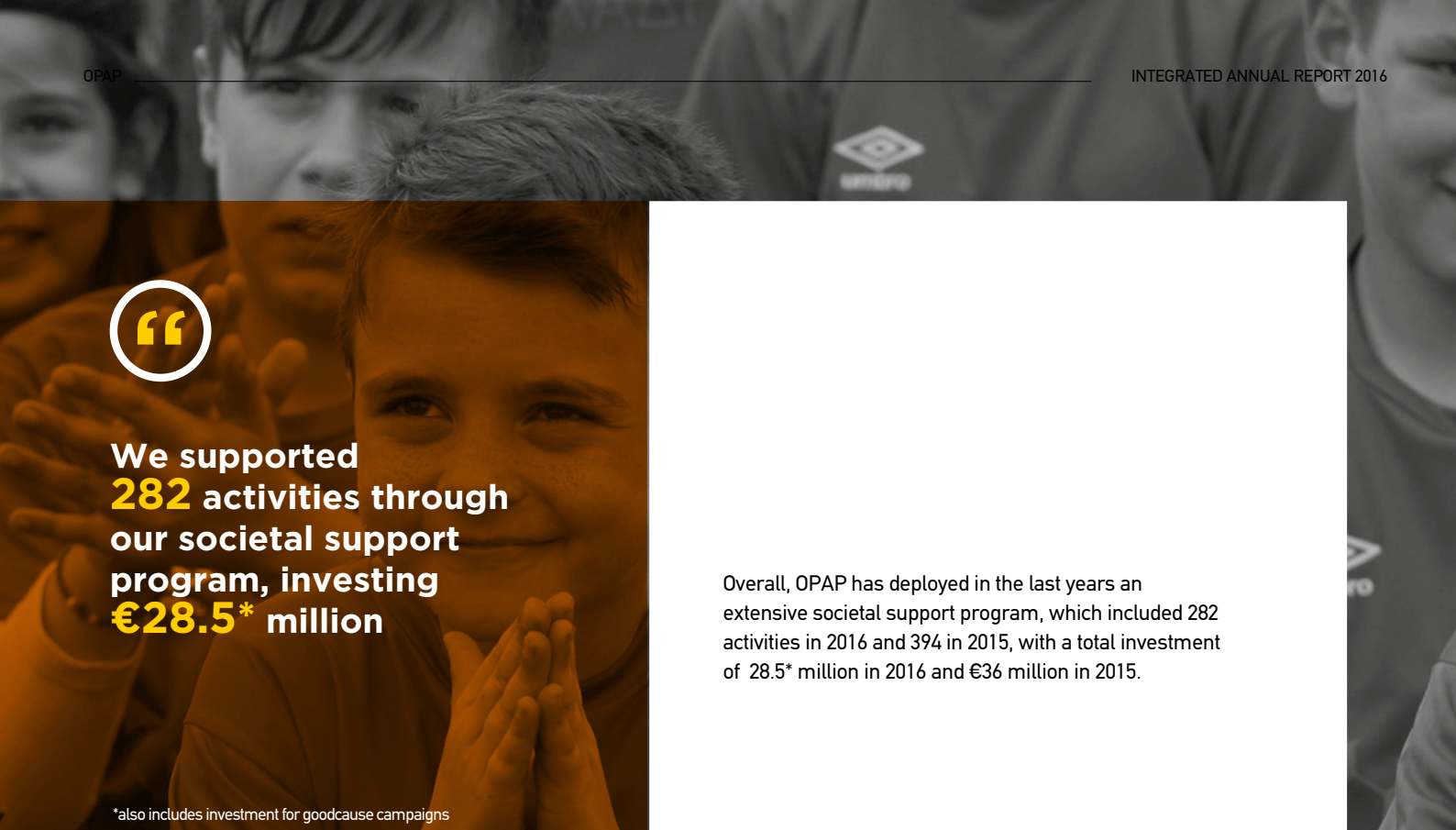
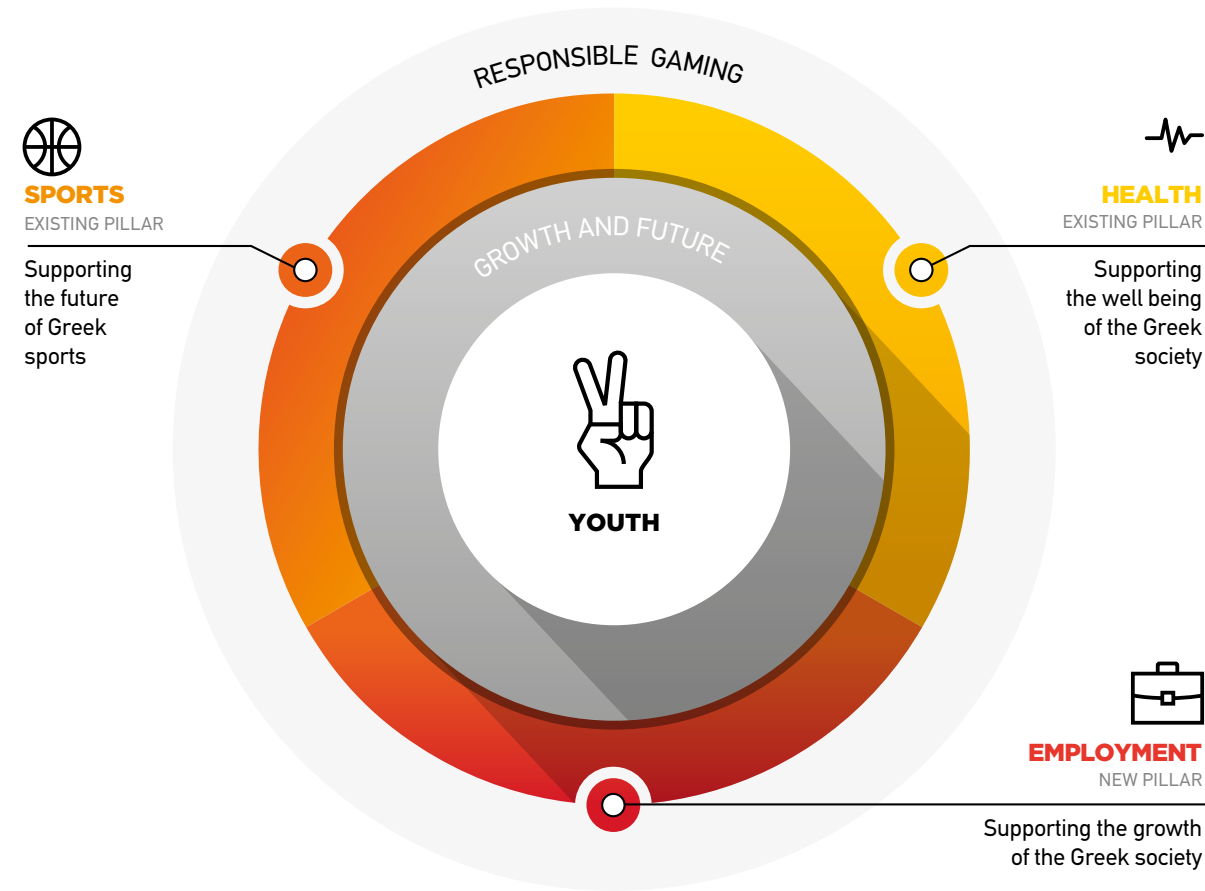
1. Responsible Donations & Sponsoring

WE EXTENSIVELY CONTRIBUTE TO SOCIETY

Within 2016, OPAP presented its integrated societal support strategy, with the main message "Something better starts here", whose campaign achieved an 83% outreach and exposure of message. Within this context, we focus on large-scale initiatives in three different

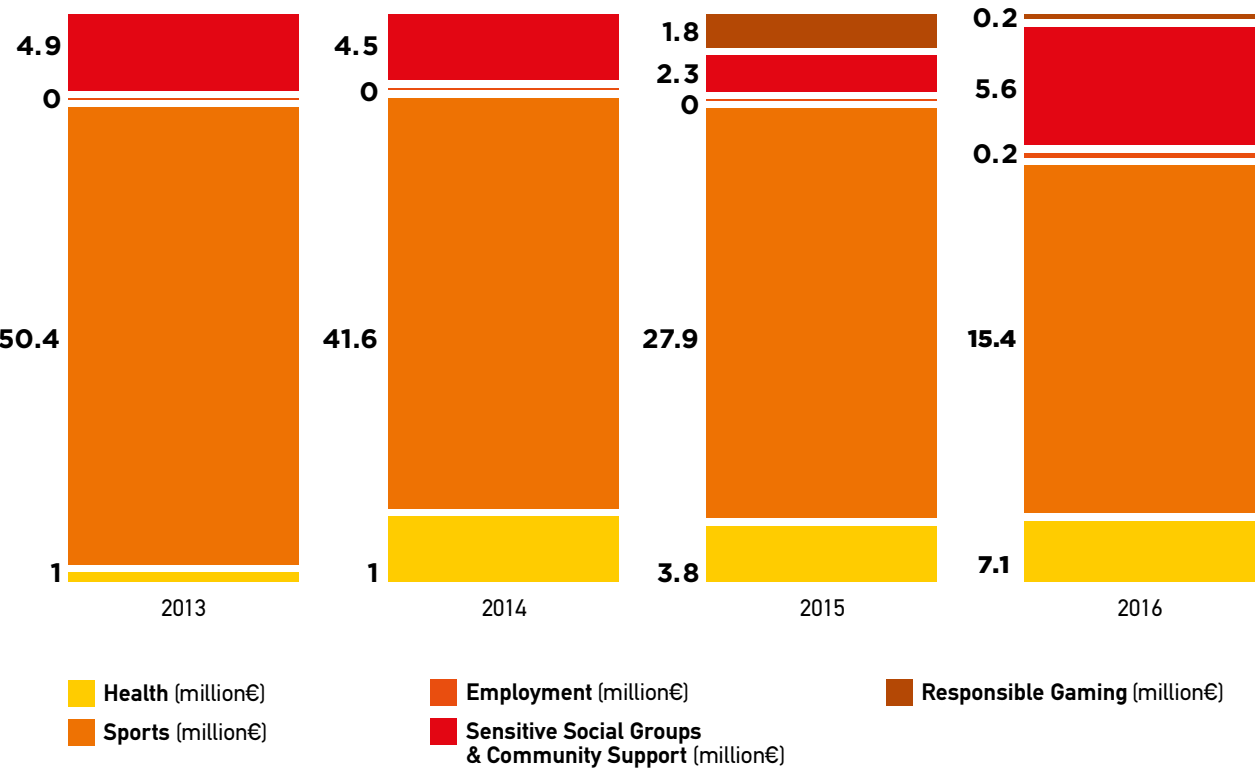
areas ,namely Health, Sports and Employment. At the same time, we continue to invest in Responsible Gaming and do not neglect to support Sensitive Social Groups & Communities, responding to stand alone needs of Greek society.

SOCIETAL SUPPORT STRATEGY



Overall, OPAP has deployed in the last years an extensive societal support program, which included 282 activities in 2016 and 394 in 2015, with a total investment of 28.5* million in 2016 and €36 million in 2015.

SOCIETAL SUPPORT PROGRAM - INVESTMENTS



VI. SUPPORTING OUR SOCIETY

GOOD PRACTICE
RESPONSIBLE
SPONSORING



We recognize the importance of our sponsoring practices, as they can change people's lives at both local and national level. In our sponsorships contracts, which include principal contracts (e.g. Super League and Volley League) and individual contracts (e.g. contracts with the National football team or football and basketball clubs):

- We have included a clause to invest approximately 20% of the contract's value to support young people.
- We have introduced clauses against violence since 2010, in order to enhance safety and security in stadiums (e.g. installation of cameras and turnstiles). It must be noted that relevant clauses were included in all new sponsorships contracts within 2016, with the exception of low-value and Marathon contracts.
- We cooperate with an independent auditing company to monitor expenditures in all contracts.
- We recursively monitor expenditures in central contracts.

Consequently only in 2016, over €527,000 were imposed as penalties for incidents of violence, compared to over €163,000 in 2015, which were reinvested to enhance safety measures in sports stadiums.



We imposed over **€527,000** as penalties for incidents of violence, which were reinvested to enhance safety measures in sports stadiums

HEALTH

GOOD PRACTICE
RENOVATION
OF HOSPITALS



OPAP undertook in April 2014 the initiative to renovate the Children's Hospitals "Aghia Sophia" and "Panagiotis & Aglaia Kyriakou".

The program aims to upgrade the Hospital Nursing Units and Outpatient Clinics, create a pleasant therapeutic environment via proper design, chromatic treatment and renovation of hospital premises, waiting and examination rooms and improve the working conditions for the medical and nursing staff.

Until now, OPAP has:

- Delivered 8 hospital units, which cover a total area of 5.330m² and have a capacity of 191 beds.
- Renovated the two 9-floor stairways and the main entrance of the 1st floor at 'Aghia Sofia' Hospital, as well as the main entrances of ground floor and 1st floor, the main stairway and the waiting rooms at 'Panagiotis & Aglaia Kyriakou' Hospital.
- Replaced the main elevator at 'Panagiotis & Aglaia Kyriakou' Hospital
- Repaired and partially replaced hotel and office equipment in all renovated spaces at both Hospitals.



5,330M²
RENOVATION
OF HOSPITALS



191
BEDS



8
HOSPITAL
NURSING UNITS



60,000
CHILDREN
SMILES

VI. SUPPORTING OUR SOCIETY

GOOD PRACTICE
“SOMETHING BETTER”



In response to OPAP’s call as the Grand Sponsor of the 34th Athens Marathon, OPAP launched the campaign “Something Better”, which achieved a 92% outreach and exposure. Over 216,000 people used the innovative mobile application “Something Better” and the website www.katikalytero.gr and contributed to the company’s project to renovate the Children’s Hospitals “Aghia Sophia” and “Panagioti & Aglaia Kyriacou”.

All users were able to participate in four challenges and virtually contribute by downloading the app, answer quiz questions correctly, spot differences in the “Spot challenge”, jump over hurdles, run distances required, invite friends, share on social media or even “check-in”.

The entire users’ virtual contributions were gathered and automatically converted by OPAP into financial support to renovate the two Hospitals, with the overall amount reaching €3,286,177 from all actions of the Athens Marathon. This support is part of the OPAP’s total investment for the Hospitals’ renovation, within the context of its societal support program.



92%
CAMPAIGN
EXPOSURE



€3,286,177
FINANCIAL
SUPPORT



216,000 people
used the innovative
mobile application
“Something Better”

SPORTS

GOOD PRACTICE
SPORTS
ACADEMIES



OPAP has developed the innovative program “Sports Academies”, which serves real needs in sports and creates value for the future generation. Within this context, OPAP supports 125 amateur academies in 48 prefectures, which have been selected through a transparent and innovative online procedure, standing next to 10,400 young athletes and 20,000 parents, while provides ongoing consultation and training to 450 academy coaches and continuously enhance their technical knowledge.

The program includes:

- A dedicated website (www.sportsacademies.opap.gr), which provides information and support from experts.
- A team of specialized pediatricians, psychologists and nutritionists, who offer scientific support, directions and advices.
- A team of coaches, who organize workshops, visit the academies and participate in trainings, based on UEFA international standards.
- An Ambassadors team, who serve as role models, participate in the football festivals organized by OPAP and advice children.
- Insurance coverage for all children during trainings and games.
- High quality sports gear for all children.

It must be noted that within the context of the “Sports Academies” program, in 2016:

- We implemented 10 Sports Academies Festivals all over Greece, with the participation of 10,000 children and 13,000 parents and chaperons (in Argos, Athens, Heraklion, Ioannina, Katerini, Larissa, Patra, Peristeri Thessaloniki and Xanthi).
- We implemented trainings with a total duration of 3,000 hours to parents, children and coaches.



125
AMATEUR
ACADEMIES



10,400
YOUNG
ATHLETES

GOOD PRACTICE
HELLENIC PARALYMPIC
COMMITTEE



OPAP is committed to promote inclusion and diversity in the world of competitive sports. Since 2011, the company supports the Hellenic Paralympic Committee and Paralympic athletes to reach their maximum potential.

As the Grand Sponsor of the Paralympic Committee, OPAP actively contributes to provide equal opportunities to Paralympic athletes, in order to increase awareness and popularity of sports for people with disabilities.

It must be noted that within 2016, OPAP:

- Renewed its sponsorship cooperation with the Hellenic Paralympic Committee for the next four years.
- Launched the TV campaign ‘Adynaton’ (Impossible) to present the Greek athletes who participated in the Rio Games, in order to raise awareness and support their efforts to overcome adversity.
- Set up a dedicated kiosk on the occasion of the Rio 2016 Paralympic Games for two days, where:
- Approximately 30,000 citizens visited the kiosk and had the opportunity to meet with Paralympic athletes and become aware of 4 paralympic sports (boccia, goalball, wheelchair fencing and sitting volleyball).
- We distributed 10,000 informative leaflets.
- Over 150 people participated in the Paralympic sports’ demonstration.

WITHIN 2016, OPAP HAS SUPPORTED
OVER 180 ACTIVITIES WITHIN THE
SPORTS SECTOR, SUCH AS:

- Provision of one high jump layer and the pole vault at Drama’s Municipal Stadium.
- The Greek National Football Team.
- Various teams competing in Super League, Football League, Basket League and Volley League.
- The Panhellenic Professional Football Players Association (PSAP).
- The Athens Olympic Athletic Center (OAKA) indoor beach volley field.

VI. SUPPORTING OUR SOCIETY

EMPLOYMENT

GOOD PRACTICE

“BUSINESS GROWTH” PROGRAM



Within 2016, OPAP launched the “Business Growth by OPAP” program, which aims to support growth of small and medium sized companies, in order to create new jobs and strengthen the Greek market. Within the context of this program, OPAP collaborates with the NGO ‘Endeavor’, in order to provide:

- Advice and guidance from successful and experienced market executives.
- Training and strategic support in financial management, human resources, branding and communication.
- Access to investment and bank credit.
- Opportunities to expand their activity to foreign markets.

It must be noted that 539 SMEs applied online to participate in the program, with a turnover of over €100,000 and with over 20% growth rate in the previous two years, while:

- 43% are located in Attica and 19% in Central Macedonia.
- 16% of applicants are women.
- Almost 40% are between 30-39 years old.
- Almost 50% have over 10 years of professional experience.

Selection of companies is based on quantitative and qualitative criteria and companies which meet the defined quantitative criteria will participate in the interview phase and will be evaluated on issues such as:

- Business strategy.
- Innovation.
- Potential for future development in accordance with the size of the market in which it operates.
- Business model.
- Qualitative characteristics.

Upon completion of interviews, OPAP will form a list of finalist-companies to select the companies that will participate in the program. In order to ensure a transparent process, OPAP will inform all companies participating in the interview phase of their results and will provide helpful advice for their further development.



We support small and medium sized companies to create new jobs and strengthen the Greek market.

DID YOU KNOW

IMPORTANCE OF SMES

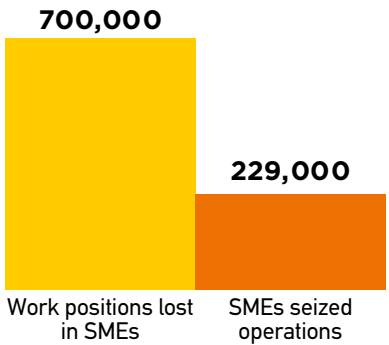


Small and medium sized companies are the backbone of the Greek economy, as they:

- Constitute 99.9% of the total number of Greek companies (approximately 630,000).
- Support local growth, with 44% of them located in rural areas.
- Employ 85.6% of the total number of employees in Greece.
- Generate 71.9% of the country's total GDP.

At the same time, SMEs have greatly suffered from the challenging financial situation in Greece in the period 2008-2014, as:

- 229,000 SMEs have seized their operations.
- 700,000 work positions in SMEs have been lost.



Sources: Monthly Economic Report, Centre of Planning and Economic Research, July 2015 / “Survey of Greek SME’s”, NBG 2014 / Growth, SMEs Performance Review, 2015 SBA Factsheet, European Commission.



VI. SUPPORTING OUR SOCIETY

SENSITIVE SOCIAL GROUPS & COMMUNITY SUPPORT

Despite redesigning our societal support, in 2014, to three focus pillars (Health, Sports and Employment), OPAP continues its long-standing contribution to support Sensitive Social Groups & Community.

GOOD PRACTICE

WISHING ORNAMENTS



For the third consecutive year, OPAP implemented its "Wishing Ornaments" initiative, in order to support the "Together for Children" association and the "SOS Children Villages". Thousands of people, as well as our employees and agents, contributed to make 4,444 children's Christmas wishes come true.

Since 2014, OPAP has realized approximately 10,000 children's Christmas and has implemented 15 infrastructure activities at participating institutions, with seven construction and repair activities in 2016, along with maintenance works, supply of technological equipment and modernization of services and facilities, which include construction of a playground, a field for sporting activities and installation of heating insulation.

WITHIN 2016, OPAP HAS SUPPORTED OVER 80 ACTIVITIES TO SUPPORT SENSITIVE SOCIAL GROUPS AND COMMUNITIES, SUCH AS:

- Donation of excessive items and equipment to various NGOs, due to our headquarters' relocation to a new building.
- Food provision and distribution to various NGOs and institutions, such as the 'Mporoume – Saving Food – Saving Lives', the 'Stegi Plus' shelter, the 'Skiagiopoulou' Child Care Centre, the Alikarnasos prison in Heraklion and the 'Doctors of the World' (Médecins du Monde).
- The photography exhibition 'Child and World', in order to support the solidarity refugee camp in Lesbos.
- Donation of audio and video mixing console to the 'Smile of the Child' organization.



We made a difference to more than 1.5 million people through our societal support program.

WE ENSURE TRANSPARENCY OF DONATIONS AND SPONSORSHIPS

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

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

WE CULTIVATE THE IMPORTANCE OF VOLUNTEER CONTRIBUTION

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

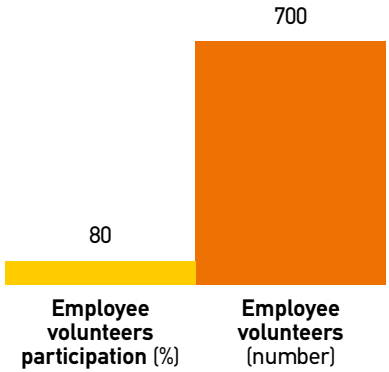
As a result of our practices, approximately 80% of our employees participated in voluntary activities within 2016, such as the 'Wishing Ornaments' initiative, the 34th Athens Marathon and the distribution of meals in the Children's Hospitals during their renovation project.

WE CARE FOR THE IMPACT OF OUR OPERATIONS

Transforming our commitment to society into practice, we strive to ensure that our operations do not have significant actual and potential negative impacts on communities and society in general. Within 2016, there were:

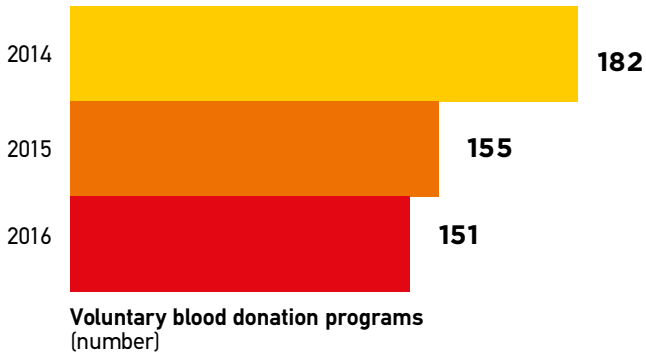
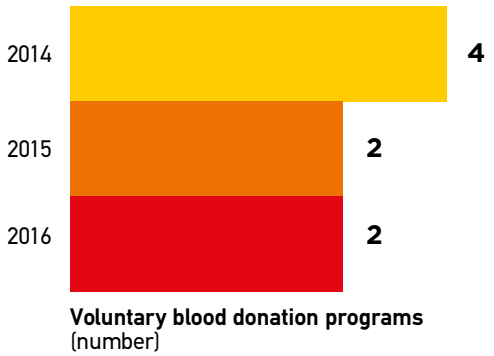
- No cases of human rights incidents affecting members of local communities.
- No cases of disputes with local communities.
- No complaints or legal actions related to our society impacts.
- No relevant fines or other sanctions imposed by the respective authorities.

EMPLOYEE PARTICIPATION IN SOCIAL SUPPORT ACTIVITIES



The voluntary blood donation at OPAP began in 2005 and takes place every six months at our headquarters. Following the relevant initiative of our Group's Employee Unions, we have established a Blood Bank and within 2016, we implemented two blood donation programs and gathered 151 blood units, out of which 63 were utilized for our employees' needs.

VOLUNTARY BLOOD DONATION



VI. SUPPORTING OUR SOCIETY

2. Responsible Procurement

WE RESPONSIBLY
SELECT OUR SUPPLIERS

We fully recognize the role that we can and should play to promote the principles of Corporate Responsibility in our supply chain.

Therefore, OPAP follows the principles of transparency and equal opportunity in its interaction with suppliers, and strives to ensure the objectivity of procurement processes.

WE SUPPORT OUR SUPPLIERS
AND OUR LOCAL SUPPLIERS

Our suppliers are 2,035 throughout Greece and abroad, with approximately 95% of them being local suppliers (1,934 local suppliers), compared to 88% in 2015. In order to enhance national and local development, we seek to utilize local suppliers for our purchases, with the percentage of procurement spending from local suppliers reaching 86% in 2016, compared to 91% in 2015.

Considering the current financial situation in Greece, we adjust our payment terms and bank guarantees to market conditions. Indicatively, the average actual payment time in 2016 remained at 30 days, as in 2015.

ALLOCATION OF PURCHASES PER REGION



We allocated **86%**
of total procurement
spending to local suppliers

1,934
GREEK
SUPPLIERS

16
SUPPLIERS
ASSESSED FOR
LABOR PRACTICES

WE INFLUENCE OUR
SUPPLY CHAIN

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

According to OPAP's Procurement Policy, suppliers are registered with updated financial and business data on a yearly basis, stating if they are currently certified according to ISO 9001, ISO 14001, ISO 27001, SA 8000, OHSAS 18001 and/or other standards, with particular attention given to suppliers for products and services with increased impact to environment and society, such as cleaning and security services, as well as distribution of materials to agents. Based on their registry information, OPAP determines whether these suppliers are eligible for future tenders.

As part of OPAP's Supplier Registry and Supplier Evaluation form, suppliers in all tenders are requested to report if they are certified for the above standards, with certified suppliers being generally preferred in tenders of over €50,000.

Monitoring of existing and new suppliers is performed through the Review of Suppliers' Environmental Performance, as well as the Review of Suppliers' Corporate Social Accountability Principles, which

assesses issues such as:

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

Within 2016, there were:

- 100% of suppliers with an annual spending of over €50,000 screened for environmental performance.
- 100% of new suppliers undersigned that comply with the respective environmental, labor, human rights or society legislative provisions (without however conducting formal audits to new suppliers regarding the above issues).
- 19 suppliers assessed for environmental impacts and 16 suppliers for labor practices, human rights or society impacts (approximately 21% and 18% respectively of significant suppliers with an annual spending of over €50,000 who had potential negative impacts in the respective areas), without however taking any further actions, as all suppliers passed the respective threshold and were found compliant.
- No suppliers with whom collaboration was terminated or not initiated (e.g. as a result of actual or potential compliance issues, such as for corruption incidents, anti-competitive behaviour and responsible communication).

VI. SUPPORTING OUR SOCIETY

3. Environmental Impact

WE FOLLOW LEGISLATION

We aim to comply with the current environmental legislation and its relevant provisions. Therefore, in order to ensure compliance with the law and minimize our environmental impact, we conduct all necessary environmental impact assessments.

- It must be noted that within 2016, there were:
- No environmental incidents of any kind.
 - No complaints and accusations of violating any environmental legislation.
 - No written notices regarding environmental issues by the respective authorities.
 - No relevant fines or other sanctions imposed, during the scheduled and ad-hoc audits conducted by the respective authorities.

GOOD PRACTICE

ENVIRONMENTAL MANAGEMENT SYSTEM

OPAP S.A. implements a certified Environmental Management System according to ISO14001:2004. As part of this system, OPAP identifies and evaluates the environmental impact of its activities, structured around 5 steps:

- Identify environmental aspects.
- Determine environmental impacts.
- Evaluate environmental impacts.
- Issue and review environmental aspects evaluation.
- Define measures and monitor actions and performance.

- Through the above procedure, we have identified the following environmental aspects as the most important:
- Printing and copying materials
 - Paper
 - Electricity
 - Electrical equipment



In 2016, there were no complaints and accusations of violating any environmental legislation

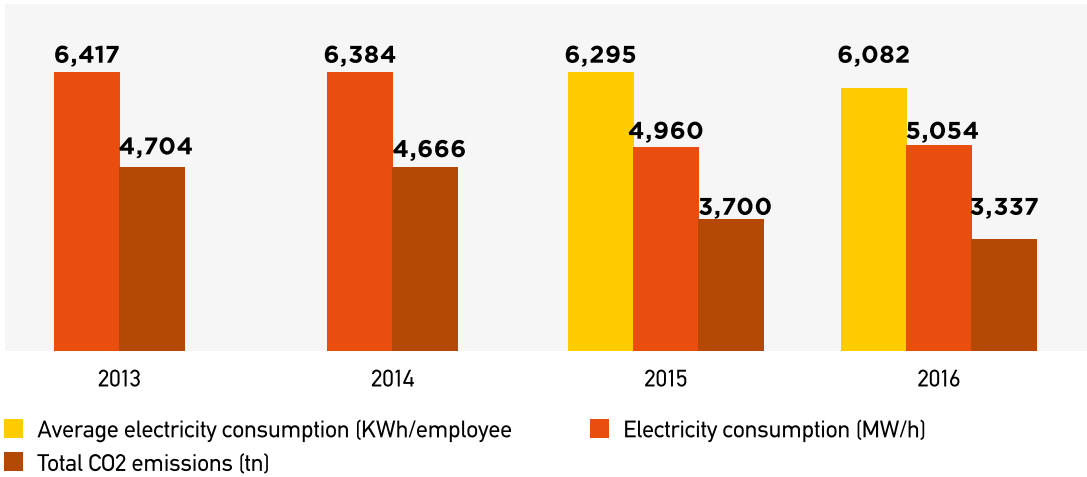
WE REDUCE OUR ENVIRONMENTAL FOOTPRINT

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

| ENERGY CONSUMPTION | | | | |
|-----------------------|------------------|------------------|------------------|------------------|
| SOURCE | CONSUMPTION 2013 | CONSUMPTION 2014 | CONSUMPTION 2015 | CONSUMPTION 2016 |
| SCOPE 1 | | | | |
| Diesel - Heating (lt) | 24,000 | 22,748 | 46,000 | 20,400 |
| Natural Gas (m³) | 20,752.6 | 13,369 | 4,284.6 | 0 |
| SCOPE 2 | | | | |
| Electricity (KWh) | 6,417,357 | 6,384,272 | 4,960,391 | 5,054,382 |

*Electricity consumption for 2015 and 2016 refers to all our buildings (in Athens, Kifisia, Thessaloniki, as well as our owned store).
**Sources of conversion factors: GHG Protocol GHG emissions from stationary combustion Calculation Tool v4.1 May 2015 (Diesel - Heating), IEA - CO2 Emissions from Fuel Combustion 2015 edition 1 (Electricity)

ELECTRICITY CONSUMPTION AND CO2 EMISSIONS



*Electricity consumption for 2015 and 2016 refers to all our buildings (in Athens, Kifisia, Thessaloniki, as well as our owned store).

The reduced environmental footprint for 2016 is the result of reduced energy consumption by 0.2% compared to 2015, with the remaining reduction due to the change of CO2 emissions conversion factor for electricity in Greece

VI. SUPPORTING OUR SOCIETY

WE MANAGE USE OF RAW MATERIALS

We recognize that raw materials are not inexhaustible. Within this context, it is our priority to use natural resources as efficiently as possible and reduce resulting waste. Therefore, we:

- Monitor use of materials.
- Reduce use of materials.
- Reuse materials.
- Recycle materials.
- Properly dispose materials.

MATERIALS RECYCLING

| SOURCE | CONSUMPTION 2013 (KGR) | CONSUMPTION 2014 (KGR) | CONSUMPTION 2015 (KGR) | CONSUMPTION 2016 (KGR) |
|--|------------------------|------------------------|------------------------|------------------------|
| Paper | 46,340 | 2,410 | 47,895 | 11,503* |
| Cartridges - toners | 102 (units) | - | 310 (units) | 292 (units) |
| Light bulbs | - | 27 (crates) | 2,320 (units) | 222 (units) |
| IT hardware and equipment (computers, printers etc.) | 2.159 (units) | 15 (units) | 2,587 (units) | 1,255 (units) |
| Furniture | - | - | 678 (units) | 941 units |

*Includes cardboard recycled after use

EMPLOYEE AWARENESS

We recognize the importance of our employees being environmentally sensitized, and therefore strive to adopt environmentally responsible behavior within the workplace.

Within this context, we conducted training courses to 22 employees on environmental issues (approximately 2.6% of total workforce) and included information on environmental protection in the new building manual, which was communicated to all employees.



WE RECYCLE OR EFFICIENTLY DISPOSE MATERIALS

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

RECYCLING CONTAINERS

We have placed containers to collect and forward for recycling paper, cartridges – toners, light bulbs and domestic batteries in our facilities. Within 2016, we collected and forwarded for recycling 46 kgr of domestic batteries, with additional quantities recycled from our agencies.

PAPER

In 2016, we purchased approximately 15 tons of paper, a quantity reduced by 11.2%, compared to the 16.9 tons in 2015, and forwarded approximately 77% of paper purchased to licensed sub-contractors for recycling. It must be noted that we recycled all disposed paper while, at the moment, we do not use recycled or FSC certified paper or any other recycled materials.

LIGHT BULBS

In 2016, we used economy bulbs to replace all old light bulbs that were sent to recycling (222 units).

CARTRIDGES-TONERS

In 2016, we acquired 348 cartridges and toners and forwarded all used cartridges-toners to licensed sub-contractors for recycling (approximately 84% of total purchased cartridges and toners).

WE REDUCE AIR POLLUTANTS

Refrigerants: Within 2016, we used R407 and R410 in our air-conditioning systems, which do not harm the Ozone layer, as their Ozone Depleting Potential (R-11 equivalent) is zero.

Air pollutants: During the relevant inspections within 2016, there were zero over the limit cases in pollutants such as carbon monoxide and volatile organic compounds (VOCs), while it must be noted that no significant sulphur and nitrogen oxides emissions are generated due to our operations.



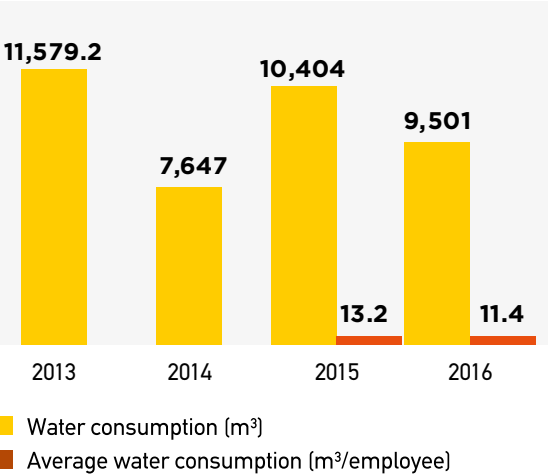
VI. SUPPORTING OUR SOCIETY

WE MONITOR WATER CONSUMPTION

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

- Water supply is exclusively through the public water supply networks, therefore we do not affect other water sources.
- We monitor and reduce water consumption, based on water gauges installed in key areas in our facilities (buildings, gardens).
- We ensure that there are no significant water leakages or discharges and no spills of other liquids. It must be noted that within 2016, there were no significant water leakages or discharges and no significant spills of chemicals or fuels took place

WATER CONSUMPTION



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

WE ASSESS OUR IMPACT ON BIODIVERSITY

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



We reduced our total carbon dioxide emissions by 0.2%, our paper consumption by 11.2% and our water consumption by 8.7%

ACHIEVEMENTS 2015 AND OBJECTIVES 2016

| WE SAID | PROGRESS | WE WILL | BY |
|--|----------|---|--------------|
| Renovate 2 floors and central staircases of Pediatric Hospitals 'Aghia Sophia' and 'Panagioti & Aglaia Kyriakou' | 100% | - Restructure and renovate one floor and one Pathology University Ward of the Children's Hospital 'Panagioti & Aglaia Kyriakou' - Restructure and renovate two University Clinics and two Daily Care Units - One Day Surgery (ODS) of the Children's Hospital 'Aghia Sophia' - Implement the 'Wishing Ornaments' initiative for the fourth consecutive year | 2017 |
| Implement construction, repair and maintenance activities to facilities and technological equipment of the 'Together for Children' association | 100% | Implement 7 construction activities to the facilities of 'SOS Villages' and 'Together for Children' organizations | 2017 |
| Organize 10 Sports Academies Festivals across Greece | 100% | -Organize 10 Sports Academies Festivals across Greece -Recruit 125 new Academies in the 'Sports Academies' program | 2017 |
| Design and launch an integrated program on employment | 100% | - Launch and recruit 20 SMEs in the 'Business Growth by OPAP' program -Develop a Supplier Code of Conduct with the requirements from our suppliers -Inform 100% of employees on environmental protection through awareness initiatives | 2017 2017 |
| Train 70% of employees on environmental awareness | 2% | Train at least 20% of employees on environmental issues | 2017 |
| Implement at least one collection and recycling program for waste light bulbs and electronic equipment waste | 100% | | |
| Recycle at least 70% of paper consumed in our office | 77% | Recycle at least 70% of paper purchased in our office | 2017 |
| Collect and recycle at least 45 kgr of domestic batteries (with an additional 1,000 kgr from our agencies) | 100% | Forward 100% of discharged domestic and industrial batteries to licensed sub-contractors for recycling | 2017 |
| Collect and recycle all used cartridges-toners | 100% | Forward 100% of discharged toners and cartridges to licensed sub-contractors for recycling | 2017 |
| Review environmental performance via questionnaires in 50% of suppliers/ contractors with an annual spending of over €100,000 | 100% | Conduct the annual environmental evaluation to 100% of suppliers with an annual spending of over €50,000 and potential negative environmental impacts | 2017 |

Development



Developing our people

Our people are at the heart of everything we do, contributing to the success of our Company. OPAP's strategic objective is to build highly-motivated teams, drive a performance culture and reward its employees, while creating a strong, engaging and fun employee experience that will also drive a strong customer experience.

Thus, our aim is to attract new talents to the Group, develop our existing people further through our OPAP Academy program, as well as ensure our people are engaged through two-way internal communications, and retained by providing opportunities for career development and recognition.

VII. DEVELOPING AND ENGAGING OUR PEOPLE

| | |
|---------------------|-----|
| 1. ATTRACT & RETAIN | 134 |
| 2. DEVELOP | 141 |
| 3. ENGAGE | 145 |



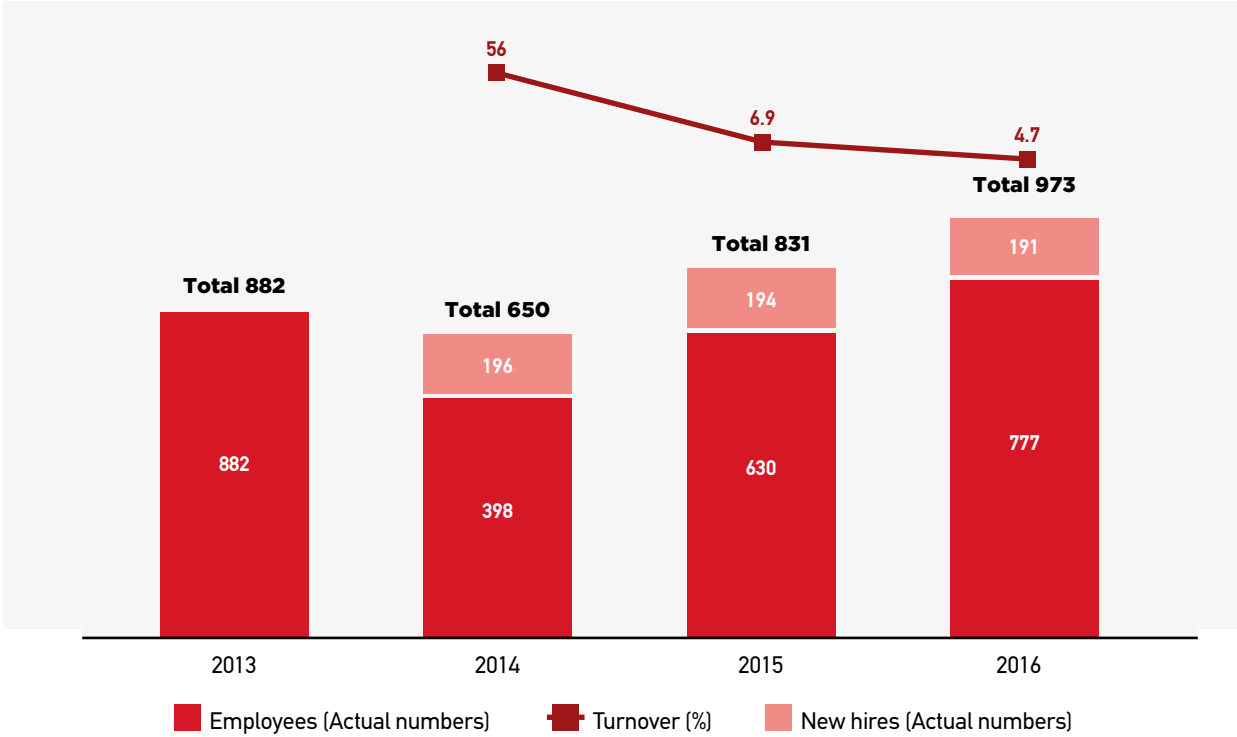
VII. DEVELOPING AND ENGAGING OUR PEOPLE

1. Attract & Retain

WE CREATE POSITIONS

OPAP is a major employer in Greece with 973 employees as of 31/12/16, while our business activity indirectly generates approximately 32,800 positions all over Greece.

HUMAN RESOURCES



*Data refer to 31/12/2016
**2016 data include OPAP S.A., OPAP Services S.A., Hellenic Lotteries S.A., Horse Races S.A., Tora Direct S.A. (ex Payzone Hellas S.A.) and Tora Wallet S.A.; 2015 data include OPAP S.A., OPAP Services S.A., Hellenic Lotteries S.A., Horse Races S.A. and Payzone Hellas S.A.; 2013 and 2014 data include OPAP S.A., OPAP Services S.A., OPAP International LTD and Hellenic Lotteries S.A.

Key characteristics of our employees are:

- There are no variations in employment numbers due to seasonality.
- The average age of our employees is 39 years.
- The average turnover rate is 4.7%, where the turnover rate for women employees is lower by 1.7% compared to men
- The average employment tenure is 4.2 years.
- There were 28 external partners working with OPAP during 2016.



We directly employ more than **973** employees, while we support approximately **32,800** positions all over the country

VII. DEVELOPING AND ENGAGING OUR PEOPLE

2016 EMPLOYEE DISTRIBUTION

| LEVEL | CEO/ GENERAL MANAGERS/ DIRECTORS | | AREA MANAGERS / DEPARTMENT HEADS/ MANAGERS | | EMPLOYEES | TOTAL |
|-----------------------------|--|---------------------|--|----------------|--------------------|-------|
| Employees (number) | 61 | | 137 | | 775 | 973 |
| EMPLOYMENT TYPE | PERMANENT | TEMPORARY | | FULL-TIME | PART-TIME | |
| Employees (number) | 937 (96.3%) | 36 (3.7%) (9 women) | | 970 (99.7%) | 3 (0.3%) (2 women) | |
| AGE | <30 | | 30-50 | | >50 | |
| Employees (number) | 67 | | 819 | | 87 | |
| NEW HIRES | FEMALE | MALE | AGE <30 | AGE 30-50 | AGE >50 | |
| Employees (number) | 58 | 133 | 32 | 149 | 10 | |
| TURNOVER | FEMALE | MALE | AGE <30 | AGE 30-50 | AGE >50 | |
| Employees (number) | 14 | 31 | 2 | 36 | 7 | |
| TURNOVER | RESIGNATION | | REDUNDANCIES | | OTHER | |
| Employees (%) | 3.4 | | 1.7 | | 0 | |
| GENDER | FEMALE | | | MALE | | |
| Employees (number) | 417 | | | 556 | | |
| PEOPLE WITH DISABILITIES | | | | | | |
| Number | 8 | | | | | |
| FOREIGNERS | | | | | | |
| Number | 23 | | | | | |
| WORKPLACE | ATHENS | | | THESSALONIKI | | |
| Employees (number) | 900 | | | 73 | | |
| EDUCATION LEVEL | HIGH SCHOOL | | | TEI/UNIVERSITY | | |
| Employees (number) | 410 | | | 563 | | |
| EMPLOYMENT TENURE | <5 YEARS | | 5-10 YEARS | | >10 YEARS | |
| Employees (%) | 58.3 | | 28.2 | | 13.5 | |

*Data refer to 31/12/2016

WE OFFER
SUBSTANTIAL BENEFITS

Besides benefits as provided by the labour law, OPAP Total Rewards program reflects our continued commitment to provide for our people and offer a comprehensive variety of programs and resources to support our employees' health and well-being needs.

As such, we apply a unified policy for our employees' care and support, with the total amount of private insurance payments exceeding €704,000 in 2016. Therefore:

- We offer a Life Insurance and Medical plan, which covers 97.9% of all our active employees (employees with permanent employment contracts and temporary employment contracts for over 1 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.
- In addition , we offer additional benefits to our employees according to business needs (i.e. mobile phones, laptops, corporate cars, gas cards)

Moreover, it must be noted that within 2016 parental leave was granted to eligible new parents and as such:

- 18 out of the 35 female employees who received their eligible parental leave returned to the company, while the rest were still on maternity leave as of 31/12/16.
- 5 employees (4 female and 1 male) were granted reduced working hours due to becoming parents.

IDENTIFYING THE RIGHT
POOL OF POTENTIAL CANDIDATES

Aiming to enrich our dynamic team with high-potential, talented, young professionals, offer them challenges and opportunities to grow, and further promote OPAP as an employer, we have participated in all major Career events taken place in Greece within 2016, such as Career Days, the biggest career fair in the Greek Labour Market & Business Talents, both organized by Kariera.gr, member of CareerBuilder, the biggest online Career network globally.

Additionally, OPAP had a strong presence at ALBA Career Forum and Deree Career Days, our Selection Team welcomed students and recent graduates to OPAP's booth, informing them of the exceptional career opportunities we offer while candidates shared their professional aspirations during short interviews.

In total, we have communicated the OPAP spirit and culture to more than 1,200 students and graduates.



We have communicated
the OPAP spirit and culture
to more than 1,200
students
and graduates



We have run also a pilot internship program, giving the opportunity to a small group of undergraduates to practice their internship. Candidates were sourced from reputable schools, organizations and career events and after a thorough qualification process have been placed in various functions (Marketing, Retail Excellence, Network Development, Retail Marketing, Sales, Finance and Legal) within our organization for a period of six months.

This initiative will continue in 2017 offering more internship opportunities to young talents.

VII. DEVELOPING AND ENGAGING OUR PEOPLE

WE ENSURE HEALTH AND SAFETY IN OUR WORK ENVIRONMENT

The health and safety of our people is paramount. We focus on following health and safety regulations and ensure suitable work conditions, through the following main actions:

- We occupy one doctor and one nurse for emergency cases.
- We perform respective audits on Health and Safety practices, within the scope of our Integrated Management System.
- We have identified occupational and work conditions risks in written Occupational Risk Assessment Studies, for both OPAP S.A. and OPAP Services S.A.
- We conducted 2 evacuation exercises in our premises in Athens and Thessaloniki.
- We maintain in regular basis our mechanical, electrical and plumbing installations, in order to have:
- The recommended quality of the internal air, regarding the temperature and the humidity.
- Proper and constant lighting in our offices.
- Ready and secure fire safety system.
- Restaurant complied with HACCP demands.
- We provide the recommended Personal Protective Equipment to our technical personnel.

The results of our approach are reflected in the following



table. It must be noted that:

- There are no employees with high incidence or risk of disease associated with their work.
- There were two serious accidents involving OPAP employees prior and after leaving work, with no such accidents in OPAP's premises.
- There were no incidents involving a female employee.
- There were no legal actions regarding health and safety issues and no fines or sanctions were imposed by the respective authorities.

HEALTH AND SAFETY

| | LOSSES IN EMPLOYEES | LOSSES IN COLLABORATORS' EMPLOYEES | NUMBER OF ACCIDENTS | NUMBER OF ACCIDENTS WITH ABSENCE < 1 DAY | NUMBER OF ACCIDENTS WITH ABSENCE > 3 DAYS | PERCENTAGE OF EMPLOYEES INVOLVED IN ACCIDENTS |
|------|---------------------|------------------------------------|---------------------|--|---|---|
| 2013 | 1 | NR* | 9 | NR* | 9 | 1% |
| 2014 | 0 | 0 | 4 | NR* | 4 | 0.6% |
| 2015 | 0 | 0 | 4 | NR* | 2 | 0.5% |
| 2016 | 0 | 0 | 8 | 4 | 4 | 0.9% |

* Not Reported

A MODERN WORKPLACE

In line with our priority to have a modern workplace, we take pride in accomplishing an important milestone for the relocation of OPAP Head offices at a privately-owned central building in 2016.

OPAP was relocated at the new 8-floor building of 12,000 sq.m. with 4 basements of 12,000 sq. m. and also at the Network Center, a nearby 3,500 sq.m. building, at Athinon Avenue.

The new work spaces reflect the renewed profile and the new corporate culture of OPAP, as a major player in the Gaming Entertainment industry, aiming to create a modern, pleasant and functional working environment that enables collaboration and satisfies the rising needs and demands of the organisation.

Committed to environmentally responsible business operations, the two buildings are equipped with smart energy and lighting systems, automations and control systems; the working spaces are placed at the perimeter of the building to utilize the natural lighting and air ventilation to the maximum.

Specifically:

- More than 1,200 state of the art and ergonomic work-stations
- Fully-fitted and equipped kitchenettes, printing stations and waiting/co-working areas at each floor
- Training center with 100 seats, 35 equipped meeting rooms, labs, interview & winners' room, two multipurpose spaces and area for events & entertainment
- Specially configured relaxation areas, external smoking spaces, booths for private phone conversations and doctor's office
- Restaurant with advanced designed internal and external areas and Roof garden at the top of the building with a breathtaking view over the Acropolis and the city of Athens, a relaxing or meeting spot, available also for special events & celebrations
- In-house "Hall of Fame" gym, fully fitted with cardio and muscular endurance equipment and with specialized personnel to enhance employees physical condition and well-being and an open Basket/ football court available for sports activities
- Numerous parking (270 internal and 100 external) and storage spaces

The new facilities offer to the OPAP people, partners, visitors and clients a pleasant environment that supports and promotes better communication and business relations.

Furthermore at the beginning of the year at Thessaloniki premises a training center with a capacity of 40 seats was created, equipped with the most modern means of instructing, covering the educational and training needs for both the personnel and the agents for Northern Greece.



VII. DEVELOPING AND ENGAGING OUR PEOPLE

GOOD PRACTICE
SOCIAL
ACCOUNTABILITY
MANAGEMENT SYSTEM



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

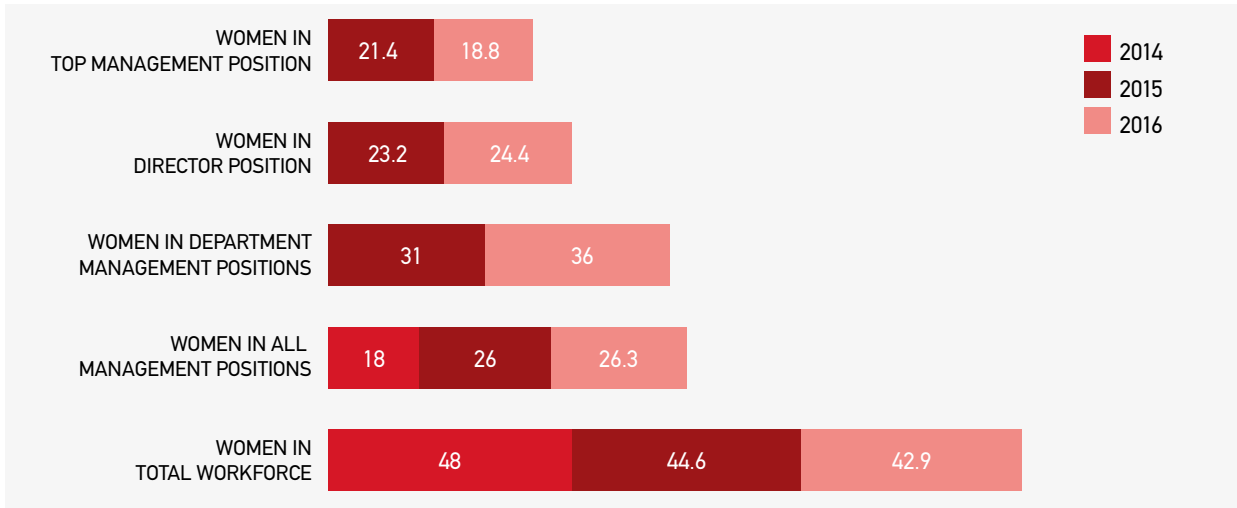


- It must be noted that:
- There were no complaints or grievances regarding discrimination incidents or unfair treatment, human rights violation.
 - There were no legal actions regarding human rights issues and no fines or sanctions were imposed by the respective authorities.
 - There were 168 labor disputes for OPAP S.A. and 8 labor disputes for OPAP Services S.A. with former employees regarding non severe labor issues.
 - The minimum salary was in all cases higher than the legal basic salary (or the higher collective agreement salary), as defined by local legislation.
 - The proportion of salary for men and women is almost equal within similar hierarchical level/area of activity/ job family, with statistically insignificant variations, as salaries do not depend on the employees' gender.
 - The percentage of women employees with temporary employment contracts compared to men employees is lower by 1.9%, while there is no difference between the percentages of part time employment contracts for men and women employees.
 - The percentage of Greeks in management and top management positions is 98.4% and 43.8% (compared to 36.4% in 2015) respectively, while the percentage of Greeks in the BoD is 36%.

WE COMMIT OURSELVES
TO BEING FAIR

Fair is one of our four core values. Our policy is not to discriminate due to race, gender, marital status, political beliefs, religion, origin, sexual orientation, age and disabilities, regarding work issues, such as recruitment and selection, salaries, promotions and career development. Our commitment relies upon the principle of equal treatment of our employees, which allows their development and professional advancement to solely depend on their performance, their abilities and needs of OPAP.

GENDER DISTRIBUTION (%)



WE RESPECT THE RIGHT OF
EMPLOYEES TO PARTICIPATE
IN EMPLOYEE UNIONS

- We respect the right of our employees to openly and freely express their opinion, either individually or in groups. It must be noted that:
- Approximately 35.8% of OPAP's employees participate in Employee Unions.
 - 100% are covered by the Greek National Collective Bargaining Agreement.
 - No operations in which the right to exercise freedom of association and collective bargaining may be at significant risk have been identified.
 - 43 of our employees (approximately 4.4% of our total workforce) participated in three National General Strikes within 2016, 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 61 working days, while the percentage of working time lost was 0.021%.
 - Our company follows, as a minimum, the relevant regulatory requirements regarding operational changes.

WE DO NOT TOLERATE CHILD,
FORCED AND ABUSIVE LABOR

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

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

- We are also committed not to encourage or tolerate any coercive or abusive labor in any of our premises. As a result of our commitments:
- There were 4 operations subject to human rights reviews (100% of total operations).
 - There are no operations identified as having significant risk for incidents of child labor or forced and abusive labor.

VII. DEVELOPING AND ENGAGING OUR PEOPLE

2. Develop

WE TRAIN AND DEVELOP OUR EMPLOYEES

Induction Training

In line with our strategic priority of developing our people and in the effort to create a common culture within all Teams, we designed an Induction Program with the aim to inform and educate participants on issues related to the operation of the Group's Teams, Products, Strategic Priorities, along with our core Principles and Values.

All newly hired employees participate in the Induction Program during the first month of employment, which specifically addresses the following:

- Company strategic priorities.
- Company overview and history.
- Vision and Values.
- Professional behaviour.
- Health and Safety.
- Code of Conduct.
- Product knowledge.
- Awareness programs on Responsible Gaming, Information Security and Integrated Management Systems.
- Teams mapping.
- Field visits.

Orientation Training

The integration of newly hired employees continues with the Orientation Training, which was conducted only on a Department level within 2016, where their immediate supervisor informs them about the department's operation, through:

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

OPAP implemented a wide range of training programs in areas such as:

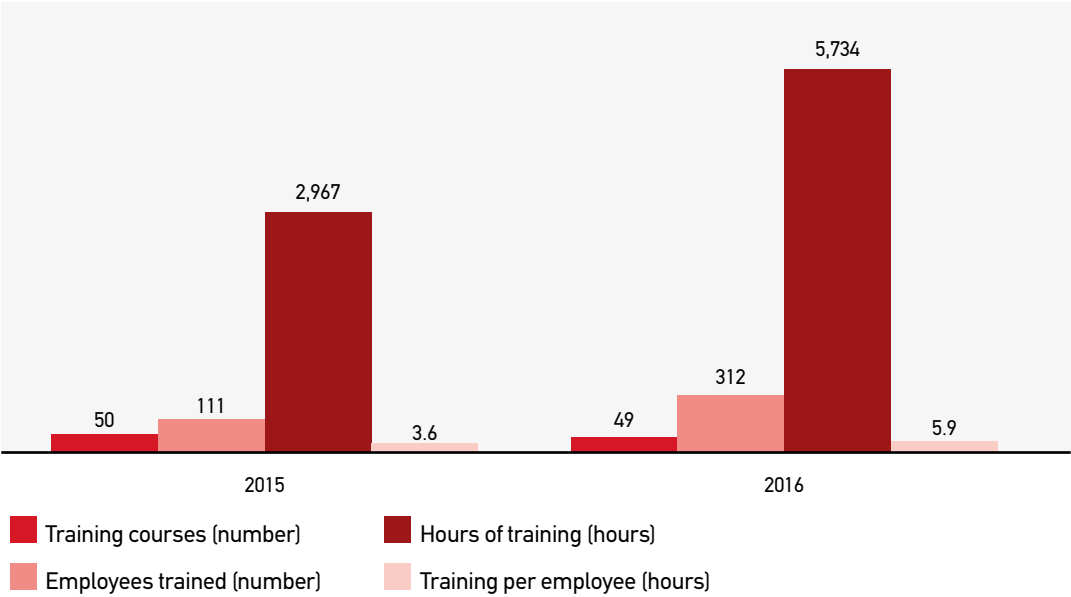
- Soft skills (e.g. Management, Leadership).
- Technical skills (e.g. Finance for non-Financials, Business Analytics and Big Data, Accounting, Procurement, SharePoint).
- Certificates (e.g. Red Hat, CISSP, PMP, TOGAF).

Within 2016:

- There was no difference to the average hours of training for men and women employees.
- We trained 13.5% of our employees to support long-term employability, rather than their current responsibilities, through external training providers, on skills such as Management and PMP.
- There were no trainings conducted on human rights issues.
- The total cost of training courses was €93,450.



EMPLOYEE TRAINING



GOOD PRACTICE

OPAP ACADEMY



OPAP Academy, which was created in 2015, is the umbrella under which all training & development activities of the OPAP Group are included. In 2016 its expansion continued, including personalized training plans and Leadership Development.

In December 2016, we launched a 5-day Induction Program for newly hired employees, which were successfully completed by 25 participants and addresses areas such as company profile and history, product knowledge, teams mapping, etc., in an interactive and highly informative way.



93.2%
INCREASE IN
TRAINING HOURS

VII. DEVELOPING AND ENGAGING OUR PEOPLE

WE DEVELOP OUR EMPLOYEES

POLICY

BUSINESS PRIORITIES AND INDIVIDUAL DEVELOPMENT PLANS

According to our Training Policy, OPAP collects all Individual Development Plans from the annual Performance Appraisal system, analyses them and proceeds to the initial creation of the Annual Training Plan.

Training needs are further exemplified and prioritized through meetings with Chiefs & Directors and are processed, analysed and included in OPAP Group Annual Training Plan.

OPAP implements a Performance Appraisal system for all employees' categories, based on:

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

By taking into account employees' current skills, as well as their abilities and areas of improvement:

- We plan the required actions to achieve desired results.
- We decide on how to develop our employees and help them achieve professional objectives, as well as advance their career prospects.
- We consider our employees' development plans for drafting our Training plan.
- We determine ways to improve productivity.

It must be noted that in 2016, all of our employees and managers in all management levels were assessed within the context of our Performance Appraisal system.

Internal Advancements

It is important for OPAP to support the development of its employees, in order to achieve their personal goals and development plans.

All job postings are communicated through the corporate Intranet, where all employees with the required profile can submit their application. Within 2016, 9% of permanent job openings were covered by internal candidates, compared to 5.7% in 2015.

Job Rotation

OPAP promotes job rotation for its employees, in order to keep them motivated and help them acquire additional knowledge and experience.

Job Descriptions

In our attempt to help increase individual and organizational effectiveness, we believe that every employee position has to be accompanied by a suitable job description. As a result, there is a valid job description for every single position within OPAP.



We are also committed not to encourage or tolerate any coercive or abusive labor

3. Engage

WE COMMUNICATE THROUGH DIFFERENT CHANNELS

As we grow at a fast pace as a company with more people joining OPAP each month, we aim to create one culture for our people and promote our core values and as such we have established an on-going, open dialogue with our employees and we have enhanced our internal communications by utilizing various touch-points, such as:

- The internal network (intranet), OPAPopen, where employees are timely informed on corporate news, important initiatives, benefits and policies and internal events and engaging activations.
- Mass email announcements to all employees, in order to communicate all policies, organisational updates, important corporate information, achievements and engaging contests.
- Newsletter, in order to share and highlight company's achievements, initiatives and new developments in alignment with our strategic priorities.
- The internal social platform Yammer, in an effort to get to know each other better, promote and enhance collaboration, share company updates and celebrate achievements.
- Digital Signage TVs, in order to internally promote key messages via short video messages, mood videos and photos from internal events. Signage in our premises to inform and promote messages, in order to raise awareness regarding projects such as Health and Safety, recycling and energy-saving initiatives.
- Internal social events, such as a pre-Christmas corporate event, employees' children party, events at the horse races for our employees and their families
- Internal events for product launches, new initiatives, updates and other achievements.
- Corporate giveaways, in order to inform about new product launches, key initiatives and celebrate achievements.

We greatly value our Corporate Responsibility to society and all involved stakeholders, and as such we have conducted three internal communication activations regarding Corporate Responsibility initiatives with the

active involvement of our employees within 2016 and all employees have been informed more than once regarding the respective issues.

GOOD PRACTICE WE HAVE CREATED A CORE VALUES ENGAGEMENT TEAM



Within 2016, we have made an important step forward towards shaping the right culture, by defining and establishing our 4 core values, namely, Fun, Dynamic, Passionate, Fair, which are the foundation for how we as a company and as individuals act in our everyday life.

Almost more than 25% of all OPAP Group employees took part in this process and we managed to produce more than 300+ suggested actions, aiming to make these Core Values live and breathe within OPAP.

A dedicated team -the Core Values Engagement Team- has been created with the mission to ensure the diffusion and integration of our values across OPAP.



VII. DEVELOPING AND ENGAGING OUR PEOPLE

ACHIEVEMENTS 2016 AND OBJECTIVES 2017

| WE SAID | PROGRESS | WE WILL | BY |
|---|----------|---|------|
| Develop and launch a Graduate Trainee program | 50% | Implement an Induction Training program for all newly hired employees and current | 2017 |
| Develop and launch a Talent Management Plan | 0% | Train all employees on Induction program | 2017 |
| Launch of OPAPacademy | 100% | Launch a new e-learning platform for all employees | 2017 |
| Conduct a Performance Appraisal for all employees | 100% | Launch a new Performance Appraisal Scheme for all employees | 2017 |
| Conduct an Employee Engagement Survey | 0% | Launch of 2017 Employee Engagement Survey | 2017 |
| Conduct at least 1 evacuation exercise at our premises | 100% | Conduct at least 2 evacuation exercise at our premises | 2017 |
| Core Values Defined | 100% | Increase Top Management visibility via different events with Top Management | 2017 |
| Relocation to new building | 100% | Launch & implementation of Core Values activities | 2017 |
| Launch of Internal Communications: Newsletter & Yammer (corporate social network) for all employees | 100% | New HR Policies & Procedures | 2017 |
| | | Individual Development Plan for all employees | 2017 |



Achieve ment



Despite the challenging environment that we are facing, we remain “constructively discontent”, further pushing the bar to create added value for our Shareholders and for our country.

VIII. ACHIEVING SOLID FINANCIAL RESULTS

| | |
|-----------------------------|-----|
| 1. FINANCIAL RESULTS | 150 |
| 2. ECONOMIC VALUE GENERATED | 156 |



VIII. ACHIEVING SOLID FINANCIAL RESULTS

1. Financial Results

WE ACHIEVE HEALTHY FINANCIAL RESULTS

The economic development for OPAP is one of our primary targets . The following graphs present the key consolidated financial figures for the last four years (since the company was fully privatized), prepared in accordance with International Financial Reporting Standards (IFRS), while additional financial information can be found in our Annual Financial Statements in section D-3.

GOOD PRACTICE

SOLID FINANCIAL RESULTS



Despite the macroeconomic environment’s uncertainty and the increased GGR contribution rate to 35% for 2016, (from 30% previously), OPAP’s financial results remain on track for 2016. In particular:

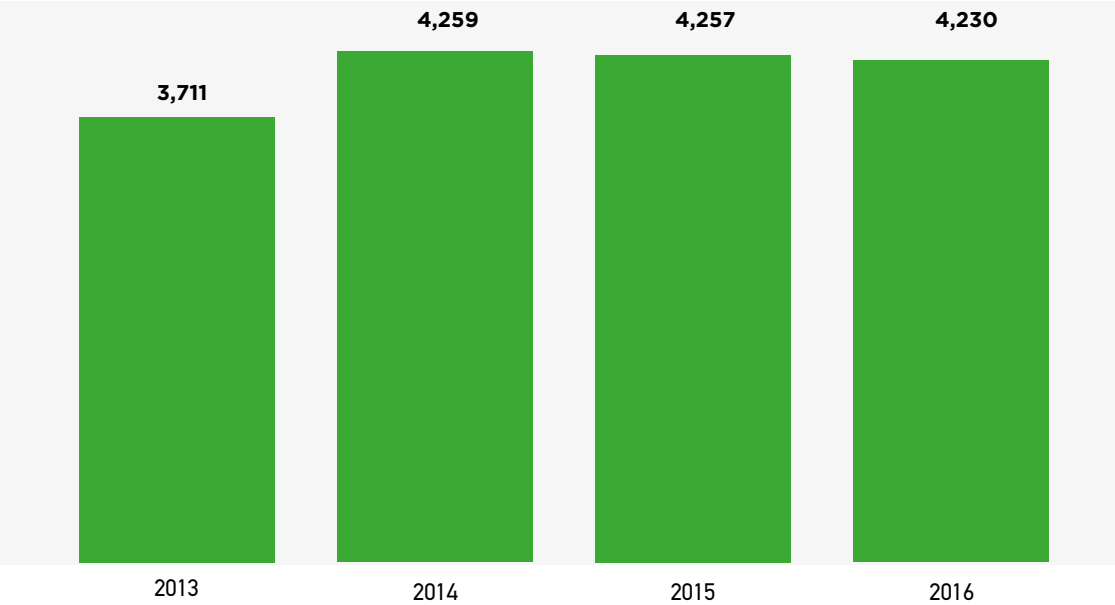
- Gross Gaming Revenue (GGR) decreased by a marginal 0.2% at €1,397.6 million (FY 2015: €1,399.7 million), remaining resilient amidst unstable retail sector trading conditions.
- EBITDA decreased by 18.4% at €307.5 million (FY 2015: €377.1 million), due to the material increase of GGR contribution at 35%. On an adjusted basis, EBITDA for the full year decreased by a much lower 3.2% and reached €365.1 million.
- Net Profit stood at €170.2 million (FY 2015: €210.7 million), , due to both a lower effective tax rate for the quarter and the Q4 2015 €15 million impairment of the Hellenic Lotteries license that burdened 2015 results.
- Solid cash position of €273.5 million.
- Dividend for the year stood at €0.72 per share compared to €0.40 per share in 2015, marking an 80% increase.



We achieved **€307.5 million EBITDA**, **€170.2 million Net Profit** and **€273.5 million solid Cash Position**

FINANCIAL HIGHLIGHTS

AMOUNTS WAGERED (€m)

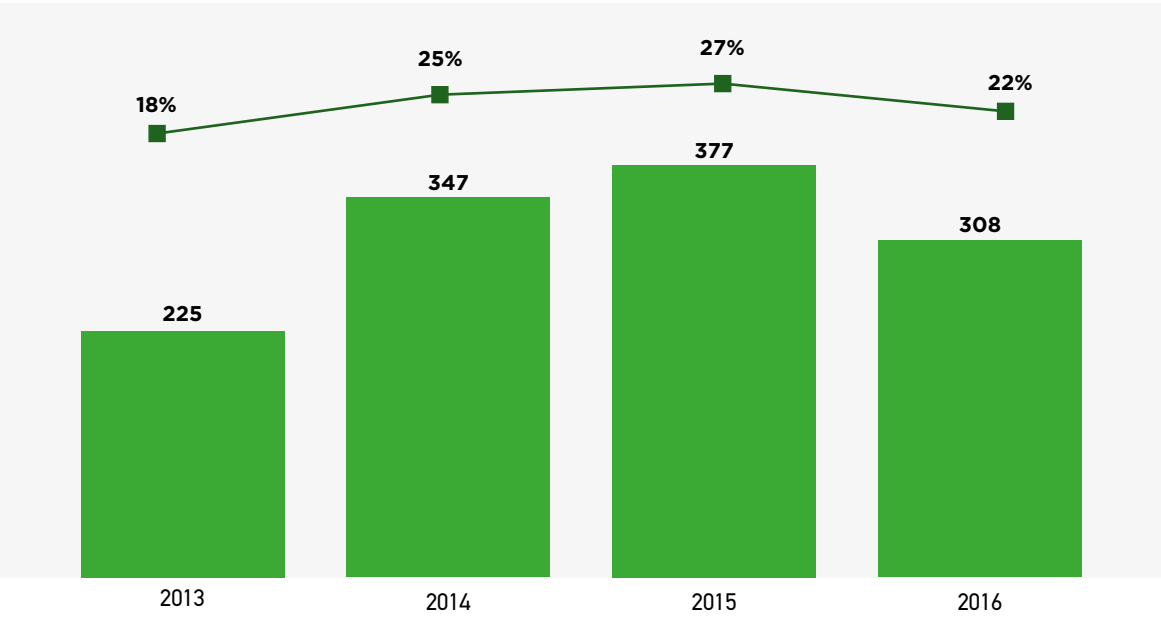


REVENUE (GGR) PER CATEGORY & PRIZE PAYOUT (%)

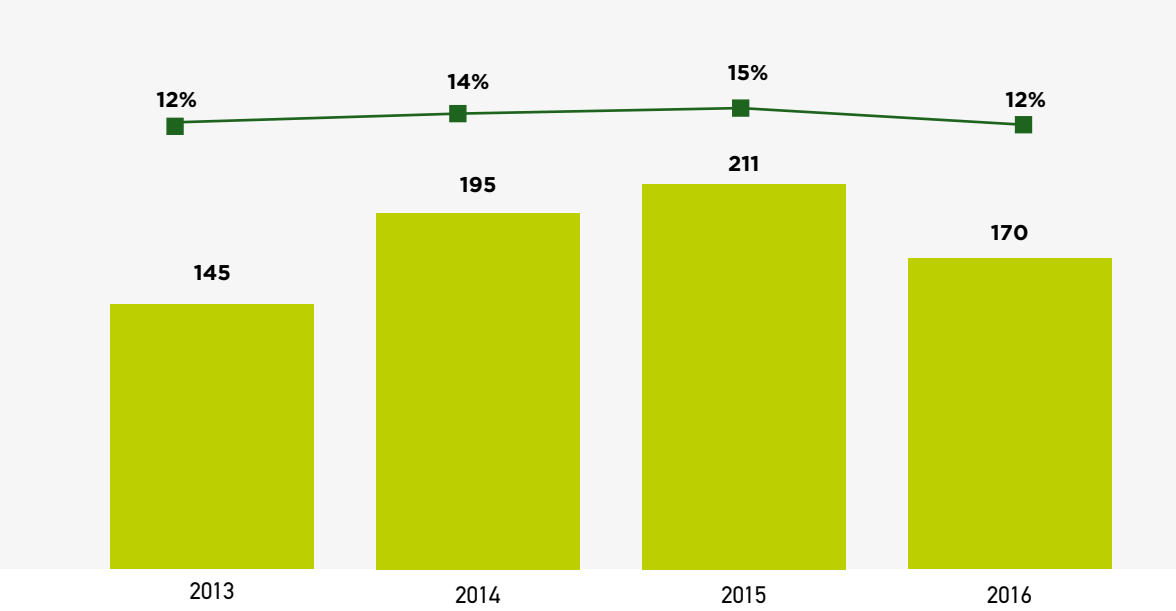


VIII. ACHIEVING SOLID FINANCIAL RESULTS

EBITDA (€m) & EBITDA margin (%)



NET PROFIT (€m) & NET PROFIT MARGIN (%)



CASH FLOWS

| (€'000) | 2013 | 2014 | 2015 | 2016 |
|---|----------|----------|----------|---------|
| Cash flow from operating activities (thousand €) | 273.874 | 284.505 | 198.436 | 94.301 |
| Cash flow from investing activities (thousand €) | -130.181 | 32.850 | -39.067 | -52.315 |
| Cash flow from financing activities (thousand €) | -269.239 | -261.998 | -155.093 | -70.158 |
| Net increase/decrease in cash and cash equivalents (thousand €) | -125.546 | 55.357 | 4.276 | -28.172 |

GOOD PRACTICE
AN EVALUATION OF THE
FY 2016 FINANCIAL
RESULTS



Despite the ongoing economic challenges, which were also reflected in the GDP contraction in Q4, OPAP's performance in FY 2016 was in line with the company's expectations. GGR remained broadly stable for the year and, although we were heavily burdened by the increased GGR contribution rate to the Hellenic Republic, our underlying financial performance remained solid.

During 2016, we set out the company's long-term ambition and the key strategic priorities and we are pleased with the progress that we have achieved across many of the key initiatives.

2017 will be a year of unprecedented levels of change for OPAP and we have started well. The year began with the smooth deployment of the first VLT machines in our new 'Play' Gaming Halls, as well as to a number of agencies in our existing network.

We also concluded agreements with our new technology partners and the work on this transformation programme is well underway. More recently, we successfully launched a €200mil. retail common bond and signed a new contractual relationship with our agent network.

Although there is still a long way to go, we are confident that the successful delivery of our plans for 2017 will act as a major step forward in the achievement of our '2020 Vision'.

ISSUE OF CONSIDERATION
PARTICIPATION OF THE
HELLENIC REPUBLIC



According to Article 56 of the multiple bill voted by the Hellenic Parliament on 22/05/2016, the Hellenic Republic increased its participation to the company's Gross Gaming Revenue (GGR) from 30% to 35%, with retrospective effect as of 01/01/2016. The relevant law came into effect as of 27/05/2016 (the date published in the official Government Gazette) and the contribution is paid to the Hellenic Republic within 16 days after the end of the calendar month it refers to. However, the increased GGR contribution severely impacted OPAP's overall profitability, while it must be noted that the 35% contribution rate is materially higher than the average in other European countries

WE TRANSPARENTLY DISCLOSE
SIGNIFICANT TRANSACTIONS

As part of being transparent in our financial reporting process, we disclose significant transactions within OPAP Group of Companies and the related parties (as defined by IAS 24). The expenses and income undertaken in 2016, as well as the balances of payables and receivables at 31/12/2016 for the Group and the Company, which arise from transactions between related parties, are presented in the following tables:

VIII. ACHIEVING SOLID FINANCIAL RESULTS

COMPANY'S TRANSACTIONS WITH RELATED PARTIES
(ELIMINATED FOR CONSOLIDATION PURPOSES)

| Company | Expenses | Income | Payables | Receivables |
|-----------------------------|----------|--------|----------|-------------|
| (Amounts in thousands euro) | | | | |
| OPAP SERVICES S.A. | 5,639 | 54 | 1,488 | 20,614 |
| OPAP SPORTS LTD | 1 | 503 | - | - |
| OPAP CYPRUS LTD | - | 26,695 | - | 6,461 |
| OPAP INVESTMENT LTD | - | 3,000 | - | 802 |
| HELLENIC LOTTERIES S.A. | - | 6,202 | 0.4 | 2,864 |
| HORSE RACES S.A. | - | 456 | - | 495 |
| TORA DIREC S.A. | - | 37 | - | 29 |
| TOEA WALLET S.A. | - | 3 | - | 7 |

GROUP'S COMPANIES TRANSACTIONS WITH RELATED COMPANIES
(NOT ELIMINATED FOR CONSOLIDATION PURPOSES)

| Company | Expenses | Income | Assets' Purchase | Payables | Receivables |
|-----------------------------|----------|--------|------------------|----------|-------------|
| (Amounts in thousands euro) | | | | | |
| Related companies | 8,068 | 1,924 | 235 | 1,092 | - |

TRANSACTION AND BALANCES WITH BOARD OF DIRECTORS MEMBERS
AND MANAGEMENT PERSONNEL

| (Amounts in thousands euro) | | GROUP | COMPANY |
|-----------------------------|--------------------------|------------------|------------------|
| Category | Description | 01.01-31.12.2016 | 01.01-31.12.2016 |
| MANAGEMENT PERSONNEL | Salaries | 8,895 | 7,259 |
| | Other compensations | 285 | 207 |
| | Cost of social insurance | 759 | 475 |
| TOTAL | | 9,939 | 7,941 |

| (Amounts in thousands euro) | | GROUP | COMPANY |
|-----------------------------|-------------|------------------|------------------|
| Category | Description | 01.01-31.12.2016 | 01.01-31.12.2016 |
| BOARD OF DIRECTORS | Salaries | 736 | 330 |
| TOTAL | | 736 | 330 |

It must be noted that:

- From the abovementioned transactions, transactions and balances from subsidiaries have been eliminated from the Group's consolidated financial statements.
- No financial assistance was received from the Greek State within 2016.
- There were no legal actions against OPAP regarding economic activities (e.g. stock market, financial reporting) and no fines or other sanctions were imposed by the respective authorities.

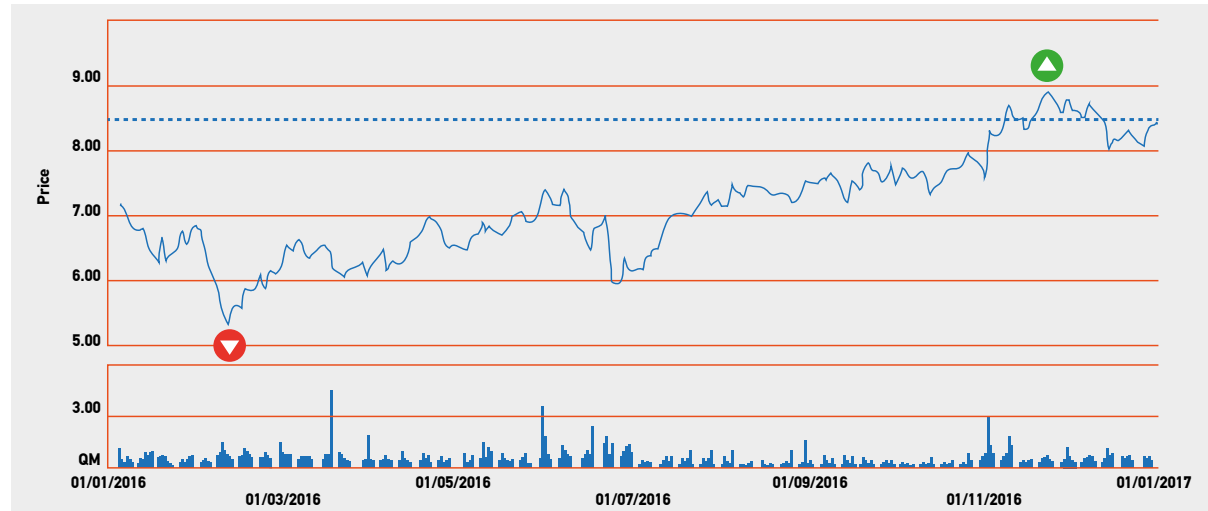
WE PROVIDE EQUAL AND TRANSPARENT
UPDATES TO THE INVESTMENT COMMUNITY

We strive to be transparent in our communication with our shareholders, with the Investor Relations Team being responsible to manage the interaction and communication with shareholders and investors via various means throughout the year, such as regular one-on-one

and group meetings, presentations, roadshows and investor conferences.

Our stock price and respective volume of transactions are indicated below.

SHARE PRICE AND VOLUME



*Volume in million shares.

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 dividend per share (DPS) paid was €0.72, marking an 80% increase compared to 2015.
- Besides the €0.72 per share regular dividend, we also distributed a €0.57 per share special dividend.
- Earnings per share (EPS) were approximately €0.53, compared to approximately €0.66 in 2015.
- We issued a common bond loan of €200 million, with 200,000 common, bearer bonds with a nominal value of €1,000 each being placed and traded in the Athens Exchange.

VIII. ACHIEVING SOLID FINANCIAL RESULTS

2. Economic Value Generated

WE DISTRIBUTE ECONOMIC VALUE GENERATED TO OUR STAKEHOLDERS

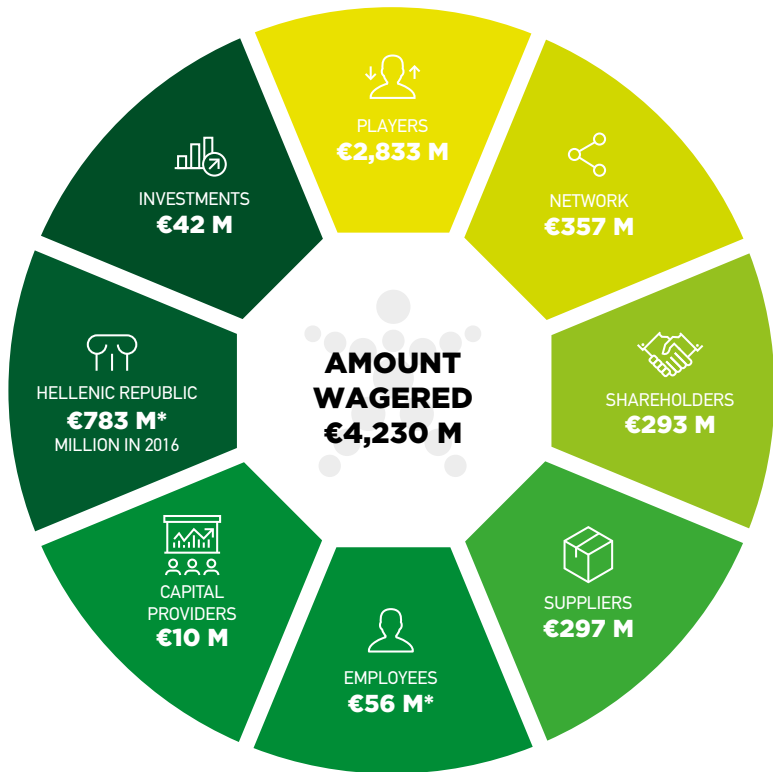
We seek to create economic value not only for our shareholders, but also for our other stakeholders, as it is particularly important during the current challenging economic situation. Our turnover and operations ensure that we return significant financial resources back to society, towards our players (through payout to lottery and betting winners), our network (through 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 2016, OPAP Group:

- Paid out over €2,833 million to players.
- Distributed over €357 million to its network.
- Distributed over €292 million to its shareholders.

- Paid over €297 million to suppliers.
- Distributed €56 million for employees
- Paid over almost 16 million to providers of capital.
- Paid over €523 million were GGR contribution to the Hellenic Republic, out of which €116 million were corporate taxes.

It must be noted that the overall investments do not include the value of pro-bono infrastructure investments, which amounted to €4 million and include the renovation project of the Children's Hospitals 'Aghia Sophia' and 'Panagiotis & Aglaia Kyriakou', as well as the construction, repair and maintenance activities to facilities and technological equipment of the 'Together for Children' association within the context of the 'Wishing Ornaments' initiative.

ECONOMIC VALUE DISTRIBUTION



*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.



We distributed over **€56** million for employees (part of this amount include social contributions that has been paid to the Greek State), **€297** million to suppliers, **€2,833** million to players and **€357** million to our network partners

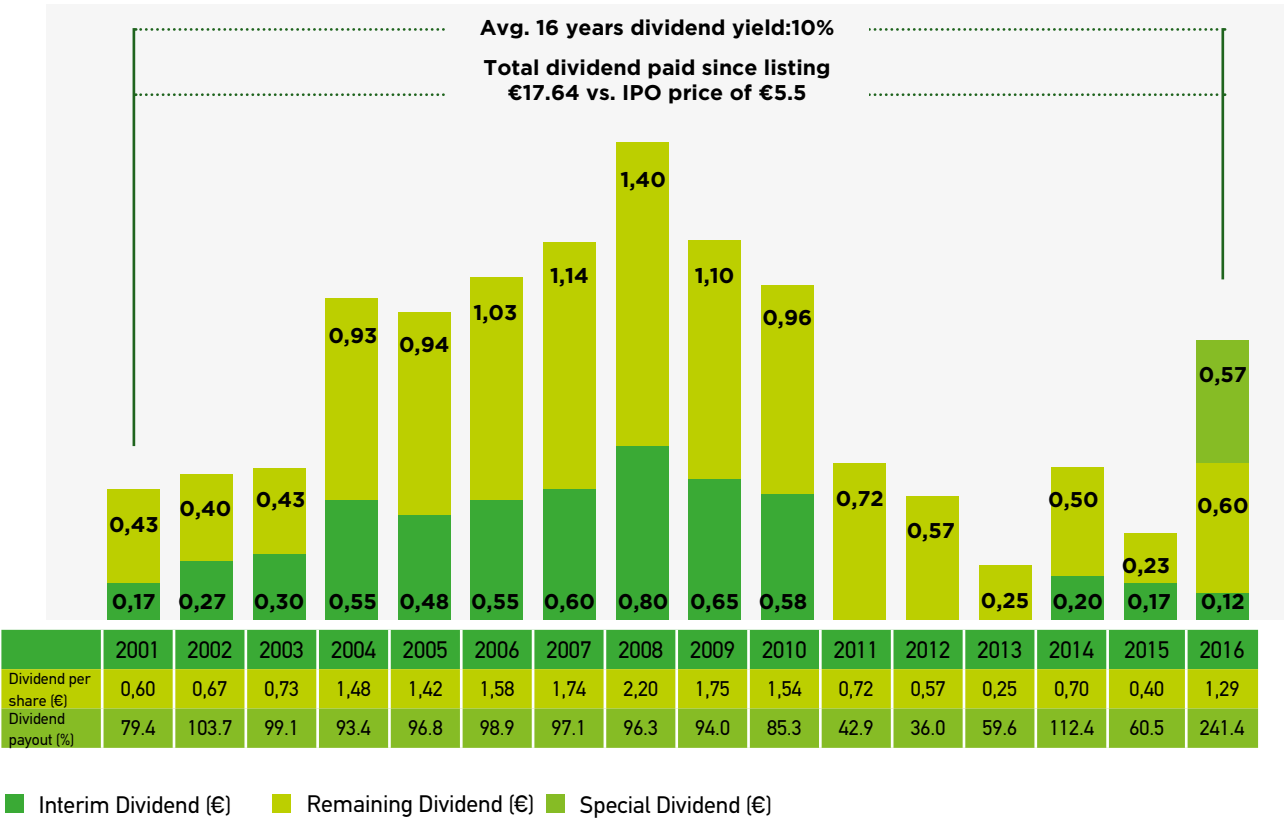
POLICY
RETURN OF UNDISTRIBUTED
WINNINGS TO THE HELLENIC
REPUBLIC



An important parameter that illustrates our commitment to create economic value for our stakeholders as well as our transparency 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 2016 (as registered in the financial statements on 31/12/2016) were €14.8 million, as in 2015.

DIVIDEND DISTRIBUTION

The company, since its listing, is offering high dividends to its shareholders, with the exemption of years that high investment expenses were realised, while the intention going forward is to distribute of the bulk of the free cash flow generated each year excluding any investment.



Appendix

C. INFORMATION & LINKS

| | |
|-------------------------------------|-----|
| 1. ABOUT THIS REPORT | 160 |
| 2. GLOBAL COMPACT, ISO26000 AND GRI | 161 |
| 3. FINANCIAL STATEMENTS | 168 |
| 4. GLOSSARY | 175 |
| 5. FEEDBACK FORM | 177 |



C. INFORMATION & LINKS

1. About this report

WELCOME TO THE 1ST INTEGRATED REPORT OF OPAP. WITHIN THIS REPORT, WE DISPLAY THE APPROACHES WE HAVE FOLLOWED AND THE RESULTS WE HAVE ACHIEVED TO SUPPORT SUSTAINABLE DEVELOPMENT AND RESPONSIBLE OPERATION.

- Principles of the Report:** The Report follows:
- For the structure and content related to non-financial information, the guidelines 'Sustainability Reporting Guidelines' (publication G4, 2013) of the Global Reporting Initiative (GRI).
 - For the presentation of quantitative data, the EFQM's RADAR Card.
- Scope of the Report:** The Integrated Report:
- Refers to the period 1/1/2016-31/12/2016 (unless is indicated otherwise in certain points).
 - Refers to all activities of OPAP Group of Companies operating in Greece, namely OPAP S.A. and all its subsidiaries, with the exception of OPAP Cyprus LTD, OPAP Sports LTD, OPAP International LTD, OPAP Investment LTD and the affiliated companies (Neurosoft S.A. and Glory Technology LTD), which are only included in financial results.
 - Addresses all our operations (design, development, organization, operation, handling and management for Numerical Lotteries, Sports Betting games, Horseracing Mutual betting, State Lotteries and Instant Win games, as well as support services).
- Restrictions of the Report:** We recognize limitations in the Report (limitations we intend to handle in future publications), such as:
- Setting quantitative targets, in all programs described within this Report.
 - Expanding our quantitative measurement system.
 - Following external assurance of the Report principles and content.
- Data of Report:** Aligned with our effort to display more quantitative results, the Report:
- Contains, as a norm, quantitative results for the last four years.
 - Contains, as a norm, quantitative data from direct measurements, with exceptions of estimations displayed being clearly indicated.
 - Data presented, have been collected internally by respective accountable departments.

Level of Report: The Report is prepared in terms of non-financial data and self-declared to be in accordance with the 'Sustainability Reporting Guidelines' (version G4, 2013) of Global Reporting Initiative (GRI), at 'Core' level.

Development of Report:
The Report has been developed in collaboration with STREAM Management

(www.stream-eu.com)

Feedback: Kindly forward your comments, thoughts, remarks or proposals regarding this Report to:
Mrs Georgia Lassanianou
Director of Corporate Social Responsibility Department
OPAP S.A.
112, Leoforos Athinon, 10442, Athens, Attica
E-mail: g.lassanianou@opap.gr

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

GOOD PRACTICE

INDICATES EXAMPLES OF GOOD PRACTICES IMPLEMENTED BY OPAP.



POLICY

INDICATES SECTIONS FROM FORMAL CORPORATE POLICIES.



DID YOU KNOW

INDICATES INFORMATION OF PARTICULAR INTEREST.



ISSUE OF CONSIDERATION

INDICATES ISSUES OF PUBLIC INTEREST.



2. Global Compact, ISO26000 and GRI

- The correspondence between the content of this Report and the Global Compact Principles, the ISO26000 International Guidelines and the Global Reporting Initiative's (GRI G4 version 2013) General and Specific Standard Disclosures is presented in the respective tables.
- Coverage of Indicators is characterized as Full (F), Partial (P) or Not Applicable (NA).
 - General Standard Disclosures of GRI required for 'Core' application level are indicated in grey background.
 - Material Aspects of GRI for the organization (based on the Materiality Analysis conducted), are indicated in grey background.
 - Boundaries of GRI indicators are indicated on the Table.
 - No external assurance has been conducted for the Material Aspects.

GLOBAL COMPACT TABLE

| Issue | Principle | Report Section | Coverage |
|-----------------|--|----------------------------------|----------|
| Human Rights | | | |
| 1. | Support and respect protection of internationally proclaimed human rights | IV-4, VI-2, VII-1 | F |
| 2. | Ensure not to be complicit in human rights abuses | IV-4, VI-2, VII-1 | F |
| Labour Standard | | | |
| 3. | Recognize freedom of association and right to collective bargaining | VII-1 | F |
| 4. | Eliminate all forms of forced and compulsory labour | IV-4, VI-2, VII-1 | F |
| 5. | Abolish effectively child labour | IV-4, VI-2, VII-1 | F |
| 6. | Eliminate discrimination in respect to employment and occupation | VII-1 | F |
| Environment | | | |
| 7. | Support a precautionary approach to environmental challenges | VI-3 | F |
| 8. | Promote greater environmental responsibility | VI-3 | F |
| 9. | Encourage development and diffusion of environmentally friendly technologies | VI-3 | F |
| Corruption | | | |
| 10. | Work against all forms of corruption, including extortion and bribery | II-1,2, III-1, IV-4, VI-1, VII-1 | F |

ISO26000 TABLE (INTERNATIONAL STANDARD)

| Aspect | Report Section | Coverage |
|--|---|----------|
| 1. Scope | II-3 | F |
| 2. Definitions | II-1,3 | F |
| 3. Understanding Social Responsibility | II-1-3 | F |
| 4. Principles of Social Responsibility | II-1-3 | F |
| 5. Recognizing Social Responsibility and Engaging Stakeholders | II-3 | F |
| 6. Guidance on Social Responsibility Core Subjects | | |
| a. Organizational Governance | II-1,3 | F |
| b. Human Rights | IV-4, VI-2, VII-1 | F |
| c. Labour practices | IV-4, VI-2, VII-1 | F |
| d. Environment | VI-3 | F |
| e. Fair operating practices | II-1, III-1, IV-4, V-1,2, VI-1,2, VII-1,2 | F |
| f. Consumer issues | III-1-3, V-1-2 | F |
| g. Community involvement and development | VI-1 | F |
| 7. Guidance on Integrating SR throughout the Organization | | |
| a. Enhancing Credibility | II-VIII | F |
| b. Communication | III-2, IV-3,4, V-2, VII-2,3, VIII-1 | F |

C. INFORMATION & LINKS

GENERAL STANDARD DISCLOSURES TABLE

| General Standard Disclosures | Report Section | Coverage/Omission | Boundary of Material Aspects |
|--|--|-------------------|------------------------------|
| Strategy and Analysis | | | Yes (company) |
| G4-1 | A | F | |
| G4-2 | A, II-2, III-2,3, IV-1, V-1,VI-1,3, VIII-1-2 | P | |
| Organisational Profile | | | Yes (company) |
| G4-3 | I-1, D-1 | F | |
| G4-4 | I-2 | F | |
| G4-5 | I-1 | F | |
| G4-6 | I-1, IV-1 | F | |
| G4-7 | I-1 | F | |
| G4-8 | I-1,2, IV-1 | F | |
| G4-9 | IV-1, VII-1, VIII-1-2 | F | |
| G4-10 | VII-1 | F | |
| G4-11 | VII-1 | F | |
| G4-12 | I-3 | F | |
| G4-13 | I-1 | F | |
| G4-14 | VI-3 | F | |
| G4-15 | A, V-1-2, VII-1, D-1 | F | |
| G4-16 | I-1 | F | |
| Identified Material Aspects and Boundaries | | | Yes (company) |
| G4-17 | I-1, VIII-1, D-1,3 | F | |
| G4-18 | II-3 | F | |
| G4-19 | II-3, D-2 | F | |
| G4-20 | II-3, D-2 | F | |
| G4-21 | II-3, D-2 | F | |
| G4-22 | A, I-1, D-1 | F | |
| G4-23 | A, I-1, D-1 | F | |
| Stakeholder Engagement | | | Yes (company) |
| G4-24 | II-3 | F | |
| G4-25 | II-3 | F | |
| G4-26 | II-3 | F | |
| G4-27 | II-3 | F | |
| Report Profile | | | Yes (company) |
| G4-28 | A, D-1 | F | |
| G4-29 | A, D-1 | F | |
| G4-30 | D-1 | F | |
| G4-31 | D-1 | F | |
| G4-32 | D-2 | F | |
| G4-33 | D-1,3 | F | |

| General Standard Disclosures | Report Section | Coverage/Omission | Boundary of Material Aspects |
|------------------------------|-----------------------|-------------------|-------------------------------------|
| Governance | | | Yes (company) |
| G4-34 | II-1 | F | |
| G4-35 | II-3 | P | |
| G4-36 | II-1-3 | F | |
| G4-37 | II-1 | P | |
| G4-38 | II-1 | F | |
| G4-39 | II-1 | F | |
| G4-41 | II-1 | P | |
| G4-43 | II-1,2 | P | |
| G4-44 | II-1 | P | |
| G4-46 | II-2 | F | |
| G4-47 | II-2 | P | |
| G4-52 | II-1 | P | |
| Ethics and Integrity | | | Yes (company, customers, suppliers) |
| G4-56 | I-1, II-1, V-1, VII-1 | F | |
| G4-58 | II-1 | P | |

C. INFORMATION & LINKS

SPECIFIC STANDARD DISCLOSURES TABLE

| DMA and Indicators | Report Section | Coverage/ Omission | Boundary of Material Aspects |
|---------------------------|----------------------|--------------------|------------------------------|
| ECONOMIC | | | Yes (company) |
| Economic Performance | | | Yes (company) |
| G4-DMA | VIII-1-2 | F | |
| G4-EC1 | VIII-1-2 | F | |
| G4-EC3 | VII-1 | P | |
| G4-EC4 | VIII-1 | F | |
| Market Presence | | | Yes (company) |
| G4-DMA | VII-1 | F | |
| G4-EC5 | VII-1 | P | |
| G4-EC6 | II-1, VII-1 | F | |
| Indirect Economic Impacts | | | |
| G4-DMA | IV-1,2, VI-1, VIII-2 | F | |
| G4-EC7 | VI-1, VIII-2 | F | |
| G4-EC8 | IV-1,2, VI-1 | F | |
| Procurement Practices | | | Yes (company, suppliers) |
| G4-DMA | VI-2 | F | |
| G4-EC9 | VI-2 | F | |
| ENVIRONMENTAL | | | Yes (company) |
| Materials | | | Yes (company) |
| G4-DMA | VI-3 | F | |
| G4-EN1 | VI-3 | P | |
| G4-EN2 | VI-3 | F | |
| Energy | | | Yes (company) |
| G4-DMA | VI-3 | F | |
| G4-EN3 | VI-3 | F | |
| G4-EN4 | VI-3 | P | |
| G4-EN5 | VI-3 | P | |
| Water | | | Yes (company) |
| G4-DMA | VI-3 | F | |
| G4-EN8 | VI-3 | F | |
| G4-EN9 | VI-3 | F | |
| Biodiversity | | | |
| G4-DMA | VI-3 | F | |
| G4-EN11 | VI-3 | F | |
| G4-EN12 | VI-3 | P | |
| Emissions | | | Yes (company) |
| G4-DMA | VI-3 | F | |
| G4-EN15 | VI-3 | P | |
| G4-EN16 | VI-3 | P | |
| G4-EN20 | VI-3 | F | |
| G4-EN21 | VI-3 | P | |

| DMA and Indicators | Report Section | Coverage/ Omission | Boundary of Material Aspects |
|--------------------------------------|----------------|--------------------|------------------------------|
| Effluents and Waste | | | Yes (company) |
| G4-DMA | VI-3 | F | |
| G4-EN22 | VI-3 | F | |
| G4-EN23 | VI-3 | P | |
| G4-EN24 | VI-3 | F | |
| G4-EN26 | VI-3 | F | |
| Compliance | | | Yes (company) |
| G4-DMA | VI-3 | F | |
| G4-EN29 | VI-3 | F | |
| Supplier Environmental Assessment | | | |
| G4-DMA | VI-2 | F | |
| G4-EN32 | VI-2 | P | |
| G4-EN33 | VI-2 | F | |
| Environmental Grievance Mechanisms | | | |
| G4-DMA | VI-3 | F | |
| G4-EN34 | VI-3 | F | |
| SOCIAL | | | |
| LABOR PRACTICES AND DECENT WORK | | | Yes (company) |
| Employment | | | Yes (company) |
| G4-DMA | VII-1 | F | |
| G4-LA1 | VII-1 | F | |
| G4-LA2 | VII-1 | P | |
| G4-LA3 | VII-1 | F | |
| Labor/Management Relations | | | |
| G4-DMA | VII-1 | F | |
| G4-LA4 | VII-1 | F | |
| Occupational Health and Safety | | | Yes (company) |
| G4-DMA | VII-1 | F | |
| G4-LA6 | VII-1 | P | |
| G4-LA7 | VII-1 | F | |
| Training and Education | | | |
| G4-DMA | VII-2 | F | |
| G4-LA9 | VII-2 | P | |
| G4-LA10 | VII-2 | P | |
| G4-LA11 | VII-2 | F | |
| Diversity and Equal Opportunity | | | Yes (company) |
| G4-DMA | VII-1 | F | |
| G4-LA12 | VII-1 | F | |
| Equal Remuneration for Women and Men | | | Yes (company) |
| G4-DMA | VII-1 | F | |
| G4-LA13 | VII-1 | F | |

C. INFORMATION & LINKS

SPECIFIC STANDARD DISCLOSURES TABLE

| DMA and Indicators | Report Section | Coverage/ Omission | Boundary of Material Aspects |
|--|-------------------|--------------------|------------------------------|
| Supplier Assessment for Labor Practices | | | Yes (company, suppliers) |
| G4-DMA | VI-2 | F | |
| G4-LA14 | VI-2 | P | |
| G4-LA15 | VI-2 | F | |
| Labor Practices Grievance Mechanisms | | | Yes (company) |
| G4-DMA | VII-1 | F | |
| G4-LA16 | VII-1 | F | |
| HUMAN RIGHTS | | | Yes (company) |
| Investment | | | |
| G4-DMA | VII-2 | F | |
| G4-HR2 | VII-2 | F | |
| Non-discrimination | | | Yes (company) |
| G4-DMA | VII-1 | F | |
| G4-HR3 | VII-1 | F | |
| Freedom of Association and Collective Bargaining | | | Yes (company) |
| G4-DMA | VI-2, VII-1 | F | |
| G4-HR4 | VI-2, VII-1 | F | |
| Child Labor | | | Yes (company, network) |
| G4-DMA | IV-4, VI-2, VII-1 | F | |
| G4-HR5 | IV-4, VI-2, VII-1 | F | |
| Forced or Compulsory Labor | | | Yes (company, network) |
| G4-DMA | IV-4, VI-2, VII-1 | F | |
| G4-HR6 | IV-4, VI-2, VII-1 | F | |
| Indigenous Rights | | | |
| G4-DMA | - | NA | |
| G4-HR8 | - | NA | |
| Assessment | | | |
| G4-DMA | VII-1 | F | |
| G4-HR9 | VII-1 | F | |
| Supplier Human Rights Assessment | | | |
| G4-DMA | VI-2 | F | |
| G4-HR10 | VI-2 | P | |
| G4-HR11 | VI-2 | F | |
| Human Rights Grievance Mechanisms | | | |
| G4-DMA | VI-1, VII-1 | F | |
| G4-HR12 | VI-1, VII-1 | F | |
| SOCIETY | | | Yes (company) |
| Local Communities | | | Yes (company) |
| G4-DMA | V-1, VI-1, VIII-2 | F | |
| G4-S01 | V-1, VI-1, VIII-2 | F | |

| DMA and Indicators | Report Section | Coverage/ Omission | Boundary of Material Aspects |
|---|---|--------------------|-----------------------------------|
| Anti-corruption | | | Yes (company) |
| G4-DMA | II-2, VI-1 | F | |
| G4-S03 | II-2, VI-1 | P | |
| G4-S04 | II-2 | P | |
| G4-S05 | II-2 | F | |
| Public Policy | | | Yes (company) |
| G4-DMA | II-1 | F | |
| G4-S06 | II-1 | F | |
| Anti-competitive Behavior | | | Yes (company) |
| G4-DMA | III-1 | F | |
| G4-S07 | III-1 | F | |
| Compliance | | | Yes (company) |
| G4-DMA | II-1,2, III-1-3, V-1-2, VI-3, VII-1, VIII-1 | F | |
| G4-S08 | II-1,2, III-1-3, V-1-2, VI-3, VII-1, VIII-1 | F | |
| Supplier Assessment for Impacts on Society | | | |
| G4-DMA | VI-2 | F | |
| G4-S09 | VI-2 | P | |
| G4-S010 | VI-2 | F | |
| Grievance Mechanisms for Impacts on Society | | | |
| G4-DMA | VI-1 | F | |
| G4-S011 | VI-1 | F | |
| PRODUCT RESPONSIBILITY | | | Yes (company, customers, network) |
| Product and Service Labeling | | | Yes (company, customers, network) |
| G4-DMA | V-1,2 | F | |
| G4-PR3 | V-1,2 | F | |
| G4-PR4 | V-1,2 | F | |
| G4-PR5 | III-2, V-1 | P | |
| Marketing Communications | | | Yes (company, customers, network) |
| G4-DMA | VI-2 | F | |
| G4-PR7 | V-2 | F | |
| Customer Privacy | | | Yes (company, customers) |
| G4-DMA | III-3, V-1 | F | |
| G4-PR8 | III-3, V-1 | F | |
| Compliance | | | |
| G4-DMA | V-1 | F | |
| G4-PR9 | V-1 | F | |

C. INFORMATION & LINKS

3. Financial Statements

Additional financial information can be found at <http://investors.opap.gr/>.

INDEPENDENT AUDITOR'S REPORT (TRANSLATED FROM THE ORIGINAL IN GREEK)

To the Shareholders of
GREEK ORGANIZATION OF FOOTBALL PROGNOSTICS S.A.

Audit Report on the Financial Statements Report on the Financial Statements

Management's Responsibility for the Financial Statements: We have audited the accompanying Stand-alone and Consolidated Financial Statements of GREEK ORGANIZATION OF FOOTBALL PROGNOSTICS S.A. (the "Company") which comprise the Stand-alone and Consolidated Statement of Financial Position as of 31 December 2016 and the Stand-Alone and Consolidated Statements of Comprehensive Income, Changes in Equity and Cash Flows for the year then ended, and a summary of significant accounting policies and other explanatory information.

Management's Responsibility for the Financial Statements: Management is responsible for the preparation and fair presentation of these Stand-alone 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 financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility: Our responsibility is to express an opinion on these stand-alone and consolidated financial statements based on our audit. We conducted our audit in accordance with International Standards on Auditing as incorporated in Greek Law. Those Standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the stand-alone and consolidated financial statements 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 internal control. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by management, as well as evaluating the overall presentation of stand-alone and consolidated the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion: In our opinion, the Stand-alone and Consolidated Financial Statements give a true and fair view of the financial position of GREEK ORGANIZATION OF FOOTBALL PROGNOSTICS S.A. as of 31 December 2016 and of 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.

Report on Other Legal and Regulatory Requirements

Taking into consideration that Management is responsible for the preparation of the Board of Directors' Report and the Corporate Governance Statement which is incorporated in this report, pursuant to the provisions of paragraph 5 of Article 2 (part B) of Law 4336/2015, we note that:

- The Board of Directors' Report includes a Corporate Governance Statement which provides the information set by article 43bb of C.L. 2190/1920.
- In our opinion, the Board of Directors' report has been prepared in accordance with the applicable legal requirements of articles 43a and 107a and paragraphs 1c and 1d of Article 43bb of C.L. 2190/1920 and its content corresponds with the accompanying Stand-alone and Consolidated Financial Statements for the year ended 31 December 2016.
- Based on the knowledge acquired during our audit, for GREEK ORGANIZATION OF FOOTBALL PROGNOSTICS S.A. and its environment, we have not identified material misstatements in the Board of Directors' Report.

Athens, 29 March 2017
KPMG Certified Auditors AE
AM SOEL 114

Nikolaos Vouniseas, Certified Auditor Accountant
AM SOEL 18701

STATEMENT OF FINANCIAL POSITION

As of 31 December 2016 and for the year then ended (Amounts in thousands of euro)

| | GROUP | | COMPANY | |
|--|------------------|------------------|------------------|------------------|
| | 31.12.2016 | 31.12.2015 | 31.12.2016 | 31.12.2015 |
| ASSETS | | | | |
| Non - current assets | | | | |
| Intangible assets | 1,216,858 | 1,222,987 | 1,041,090 | 1,063,227 |
| Property, plant & equipment | 67,583 | 56,238 | 45,196 | 32,861 |
| Investment property | 940 | 1,398 | 940 | 1,398 |
| Goodwill | 14,183 | 14,183 | - | - |
| Investments in subsidiaries | - | - | 280,604 | 147,604 |
| Investments in associates | 12,175 | 11,225 | - | - |
| Long - term receivables | 13 | 112 | 13 | 112 |
| Other non - current assets | 6,384 | 2,962 | 21,263 | 24,912 |
| Deferred tax asset | 12,154 | 9,815 | - | - |
| Total non - current assets | 1,330,291 | 1,318,920 | 1,389,107 | 1,270,114 |
| Current assets | | | | |
| Cash and cash equivalents | 273,523 | 301,695 | 65,433 | 231,115 |
| Inventories | 12,469 | 13,265 | 2,350 | 280 |
| Trade receivables | 80,634 | 55,234 | 33,667 | 23,391 |
| Other current assets | 70,757 | 19,719 | 50,198 | 17,630 |
| Total current assets | 437,384 | 389,913 | 151,648 | 272,416 |
| TOTAL ASSETS | 1,767,675 | 1,708,833 | 1,540,755 | 1,542,530 |
| EQUITY & LIABILITIES | | | | |
| Equity | | | | |
| Share capital | 95,700 | 95,700 | 95,700 | 95,700 |
| Reserves | 32,417 | 48,773 | 31,900 | 48,474 |
| Treasury shares | (7,454) | (2,719) | (7,454) | (2,719) |
| Retained earnings | 914,614 | 1,020,068 | 917,975 | 1,020,827 |
| Equity attributable to owners of the Company | 1,035,277 | 1,161,822 | 1,038,121 | 1,162,282 |
| Non-controlling interests | | | | |
| Total equity | 1,072,231 | 1,202,827 | 1,038,121 | 1,162,282 |
| Non-current liabilities | | | | |
| Loans | 263,000 | 115,000 | 208,000 | 115,000 |
| Deferred tax liability | - | - | 3,962 | 3,493 |
| Employee benefit plans | 1,507 | 1,036 | 1,355 | 932 |
| Provisions | 34,049 | 59,061 | 32,673 | 57,591 |
| Other non-current liabilities | 6,699 | 5,926 | 5,306 | 5,409 |
| Total non-current liabilities | 305,254 | 181,022 | 251,296 | 182,425 |
| Current liabilities | | | | |
| Loans | 118,689 | 32,097 | 118,689 | 2,097 |
| Trade payables | 153,348 | 127,091 | 65,100 | 52,562 |
| Tax liabilities | 51,429 | 129,942 | 43,960 | 119,724 |
| Other current liabilities | 66,722 | 35,853 | 23,590 | 23,441 |
| Total current liabilities | 390,189 | 324,984 | 251,338 | 197,824 |
| Total liabilities | 695,443 | 506,006 | 502,634 | 380,248 |
| TOTAL EQUITY & LIABILITIES | 1,767,675 | 1,708,833 | 1,540,755 | 1,542,530 |

C. INFORMATION & LINKS

STATEMENT OF COMPREHENSIVE INCOME

As of 31 December 2016 and for the year then ended (Amounts in thousands of euro except for per share amounts)

| | GROUP | | COMPANY | |
|--|------------------|------------------|------------------|------------------|
| | 01.01-31.12.2016 | 01.01-31.12.2015 | 01.01-31.12.2016 | 01.01-31.12.2015 |
| Amounts wagered | 4,229,974 | 4,257,317 | 3,521,958 | 3,603,419 |
| The Statement of Comprehensive income is as follows: | | | | |
| Revenue (GGR) | 1,397,565 | 1,399,671 | 1,152,655 | 1,167,601 |
| GGR contribution and other levies and duties | (466,743) | (411,964) | (402,819) | (350,420) |
| Agents' commission | (357,775) | (362,369) | (292,830) | (300,984) |
| Net gaming revenue (NGR) | 573,047 | 625,339 | 457,006 | 516,197 |
| Other operating income | 108,462 | 128,662 | 43,453 | 43,413 |
| Operating expenses | | | | |
| Payroll expenses | (56,199) | (46,098) | (49,038) | (41,370) |
| Marketing expenses | (70,585) | (76,171) | (53,168) | (58,351) |
| Other operating expenses | (247,185) | (254,628) | (124,360) | (120,476) |
| Profit before interest, tax, depreciation and amortization (EBITDA) | 307,540 | 377,103 | 273,892 | 339,413 |
| Depreciation and amortization | (58,286) | (74,332) | (36,684) | (39,995) |
| Results from operating activities | 249,254 | 302,770 | 237,208 | 299,418 |
| Finance income | 3,641 | 1,732 | 784 | 890 |
| Finance costs | (16,928) | (6,400) | (13,181) | (4,287) |
| Other finance income | 950 | 1,490 | 9,103 | 5,640 |
| Profit before tax | 236,916 | 299,592 | 233,914 | 301,661 |
| Income tax expense | (64,060) | (89,692) | (61,826) | (90,571) |
| Profit for the year | 172,856 | 209,901 | 172,088 | 211,091 |
| Other comprehensive income – items that will not be reclassified to profit or loss | | | | |
| Actuarial gains/(losses) | (253) | 51 | (247) | 37 |
| Related tax | 73 | (15) | 71 | (11) |
| Other comprehensive income, net of tax | (179) | 37 | (175) | 26 |
| Total comprehensive income | 172,677 | 209,937 | 171,913 | 211,116 |
| Profit attributable to: | | | | |
| Owners of the Company | 170,236 | 210,719 | 172,088 | 211,091 |
| Non-controlling interests | 2,620 | (819) | - | - |
| | 172,677 | 209,937 | 171,913 | 211,116 |
| Total comprehensive income attributable to: | | | | |
| Owners of the Company | 170,057 | 210,755 | 171,913 | 211,116 |
| Non-controlling interests | 2,620 | (817) | - | - |
| | 172,677 | 209,937 | 171,913 | 211,116 |
| Basic and diluted earnings (after tax) per share in € | 0.5344 | 0.6609 | 0.5403 | 0.6621 |

STATEMENT OF CHANGES IN EQUITY

CONSOLIDATED STATEMENT OF CHANGES IN EQUITY

As of 31 December 2016 and for the year then ended (Amounts in thousands of euro)

| GROUP | Share capital | Reserves | Treasury shares | Retained earnings | Non-controlling interests | Total equity |
|--|---------------|----------|-----------------|-------------------|---------------------------|--------------|
| Balance as of 1 January 2015 | 95,700 | 48,474 | - | 1,023,525 | 67,365 | 1,235,064 |
| Profit for the year | - | - | - | 210,719 | (819) | 209,901 |
| Other comprehensive income | - | - | - | 35 | 2 | 37 |
| Total comprehensive income | - | - | - | 210,755 | (817) | 209,937 |
| Transactions with owners of the Company | | | | | | |
| Acquisition of treasury shares (Note 11.15) | - | - | (2,719) | - | - | (2,719) |
| Reserves of subsidiaries (Note 11.14) | - | 299 | - | (299) | - | - |
| Share capital increase expenses of subsidiary | - | - | - | (479) | (236) | (715) |
| Share capital decrease of subsidiary | - | - | - | - | (21,452) | (21,452) |
| Long-term bonus incentive scheme (Note 11.18) | - | - | - | 884 | - | 884 |
| Dividends paid | - | - | - | (213,662) | (3,560) | (217,222) |
| Total transactions with owners of the Company | - | 299 | (2,719) | (213,556) | (25,248) | (241,224) |
| Changes in ownership interests | | | | | | |
| Acquisition of non controlling interests of subsidiaries | - | - | - | (655) | (294) | (950) |
| Total changes in ownership interests | - | - | - | (655) | (294) | (950) |
| Balance as of 31 December 2015 | 95,700 | 48,773 | (2,719) | 1,020,068 | 41,005 | 1,202,827 |
| Balance as of 1 January 2016 | 95,700 | 48,773 | (2,719) | 1,020,068 | 41,005 | 1,202,827 |
| Profit for the year | - | - | - | 170,236 | 2,620 | 172,856 |
| Other comprehensive loss | - | - | - | (180) | - | (179) |
| Total comprehensive income | - | - | - | 170,057 | 2,620 | 172,677 |
| Transactions with owners of the Company | | | | | | |
| Transfer between reserves (Note 11.14) | - | (16,574) | - | 16,574 | - | - |
| Acquisition of treasury shares (Note 11.15) | - | - | (4,735) | - | - | (4,735) |
| Reserves of subsidiaries (Note 11.14) | - | 218 | - | (218) | - | - |
| Share capital increase expenses of subsidiaries | - | - | - | (529) | (73) | (601) |
| Share capital decrease of subsidiary (Note 11.16) | - | - | - | - | (6,598) | (6,598) |
| Long-term bonus incentive scheme (Note 11.18) | - | - | - | 1,768 | - | 1,768 |
| Dividends paid | - | - | - | (293,106) | - | (293,106) |
| Total transactions with owners of the Company | - | (16,356) | (4,735) | (275,511) | (6,671) | (303,273) |
| Balance as of 31 December 2016 | 95,700 | 32,417 | (7,454) | 914,614 | 36,954 | 1,072,231 |

C. INFORMATION & LINKS

SEPARATE STATEMENT OF CHANGES IN EQUITY

As of 31 December 2016 and for the year then ended (Amounts in thousands of euro)

| COMPANY | Share capital | Reserves | Treasury shares | Retained earnings | Total equity |
|---|---------------|----------|-----------------|-------------------|--------------|
| Balance as of 1 January 2015 | 95,700 | 48,474 | - | 1,022,487 | 1,166,661 |
| Profit for the year | - | - | - | 211,091 | 211,091 |
| Other comprehensive income | - | - | - | 26 | 26 |
| Total comprehensive income | - | - | - | 211,116 | 211,116 |
| Acquisition of treasury shares (Note 11.15) | - | - | (2,719) | - | (2,719) |
| Long-term bonus incentive scheme (Note 11.18) | - | - | - | 884 | 884 |
| Dividends paid | - | - | - | (213,661) | (213,661) |
| Balance as of 31 December 2015 | 95,700 | 48,474 | (2,719) | 1,020,827 | 1,162,282 |
| Balance as of 1 January 2016 | 95,700 | 48,474 | (2,719) | 1,020,827 | 1,162,282 |
| Profit for the year | - | - | - | 172,088 | 172,088 |
| Other comprehensive loss | - | - | - | (175) | (175) |
| Total comprehensive income | - | - | - | 171,913 | 171,913 |
| Transfer between reserves (Note 11.14) | - | (16,574) | - | 16,574 | - |
| Acquisition of treasury shares (Note 11.15) | - | - | (4,735) | - | (4,735) |
| Long-term bonus incentive scheme (Note 11.18) | - | - | - | 1,768 | 1,768 |
| Dividends paid | - | - | - | (293,106) | (293,106) |
| Balance as of 31 December 2016 | 95,700 | 31,900 | (7,454) | 917,975 | 1,038,121 |

CASH FLOW STATEMENT

As of 31 December 2016 and for the year then ended (Amounts in thousand of euro)

| | GROUP | | COMPANY | |
|---|------------------|------------------|------------------|------------------|
| | 01.01-31.12.2016 | 01.01-31.12.2015 | 01.01-31.12.2016 | 01.01-31.12.2015 |
| OPERATING ACTIVITIES | | | | |
| Profit before tax | 236,916 | 299,592 | 233,914 | 301,661 |
| Adjustments for: | | | | |
| Depreciation & Amortization | 58,286 | 59,310 | 36,684 | 39,995 |
| Net finance costs | 13,199 | 4,666 | 3,206 | (2,245) |
| Employee benefit plans | 3,112 | 1,174 | 2,807 | 1,114 |
| Provisions for bad debts | 72 | 220 | (149) | - |
| Other provisions | (11,788) | 9,128 | (11,692) | 9,100 |
| Impairment losses on tangible & intangible assets | 29 | 15,021 | - | - |
| Exchange differences | 88 | 2 | 88 | 2 |
| Impairment of investment in subsidiary | - | - | 12,000 | - |
| Reversal of impairment loss on remeasurement of associates | (350) | (893) | - | - |
| Share of profit from associates | (600) | (600) | - | - |
| (Gain) / loss from investing activities | (705) | (202) | (642) | 5 |
| Other non-cash items | - | - | 2,869 | 1,973 |
| Total | 298,260 | 387,418 | 279,084 | 351,604 |
| Changes in Working capital | | | | |
| (Increase) / decrease in inventories | 789 | (10,289) | (2,071) | (280) |
| (Increase) / decrease in receivables | (66,996) | 35,707 | (41,746) | 48,194 |
| Increase / (decrease) in payables (except banks) | 22,060 | (59,424) | (3,505) | (83,503) |
| Decrease in taxes payable | (27,735) | (6,999) | (29,018) | (4,172) |
| Total | 226,379 | 346,413 | 202,745 | 311,844 |
| Interest paid | (15,140) | (5,524) | (11,469) | (3,467) |
| Income tax paid | (116,937) | (142,454) | (107,801) | (135,743) |
| Net cash flows from operating activities | 94,301 | 198,436 | 83,475 | 172,634 |
| INVESTING ACTIVITIES | | | | |
| Proceeds from sale of tangible & intangible assets | 684 | 321 | 677 | 32 |
| Extra charge for the acquisition of subsidiary | (695) | (1,090) | - | - |
| Loans granted to third parties | (12,700) | - | - | - |
| Share capital (increase) / decrease in subsidiaries | - | - | (145,000) | 34,500 |
| Purchase of intangible assets | (18,596) | (11,672) | (5,821) | (2,934) |
| Purchase of property, plant and equipment | (24,269) | (27,977) | (20,640) | (18,385) |
| Dividends received | - | - | 9,103 | 5,640 |
| Interest received | 3,261 | 1,350 | 485 | 532 |
| Net cash flows (used in) / from investing activities | (52,315) | (39,067) | (161,196) | 19,385 |
| FINANCING ACTIVITIES | | | | |
| Proceeds from loans & borrowings | 276,689 | 147,096 | 221,689 | 117,097 |
| Payments of loans & borrowings | (42,097) | - | (12,097) | - |
| Acquisition of treasury shares | (4,735) | (2,719) | (4,735) | (2,719) |
| Payment of finance lease interest | - | (1) | - | - |
| Payment of finance lease principal | - | (4) | - | - |
| Share capital increase expenses of subsidiaries | (599) | (715) | - | - |
| Return of share capital of subsidiary | (6,598) | (21,452) | - | - |
| Dividends paid | (292,819) | (277,298) | (292,819) | (273,738) |
| Net cash flows used in financing activities | (70,158) | (155,093) | (87,961) | (159,359) |
| Net (decrease) / increase in cash and cash equivalents | (28,172) | 4,276 | (165,682) | 32,660 |
| Cash and cash equivalents at the beginning of the year | 301,695 | 297,418 | 231,115 | 198,455 |
| Cash and cash equivalents at the end of the year | 273,523 | 301,695 | 65,433 | 231,115 |

C. INFORMATION & LINKS

OPERATING SEGMENTS

For management information purposes and decision making, the Group is structured in operating segments as presented below:

As of 31 December 2016 and for the year then ended

| GROUP 01.01-31.12.2016 | Lotteries | Sports Betting | Instant & Passives | Other | Total |
|---|-----------|-------------------|-----------------------|---------|-----------|
| Amounts wagered | 2,493,410 | 1,295,158 | 441,407 | - | 4,229,974 |
| Revenue (GGR) | 841,297 | 397,215 | 159,054 | - | 1,397,565 |
| GGR contribution and other levies and duties | (281,637) | (137,323) | (47,783) | - | (466,743) |
| Agents' commission | (212,850) | (102,212) | (41,311) | (1,401) | (357,775) |
| Net gaming revenue (NGR) | 346,809 | 157,679 | 69,959 | (1,401) | 573,047 |

| GROUP 01.01-31.12.2015 | Lotteries | Sports Betting | Instant & Passives | Other | Total |
|---|-----------|-------------------|-----------------------|---------|-----------|
| Amounts wagered | 2,418,836 | 1,401,948 | 436,532 | - | 4,257,317 |
| Revenue (GGR) | 829,798 | 411,984 | 157,890 | - | 1,399,671 |
| GGR contribution and other levies and duties | (240,699) | (123,555) | (47,709) | - | (411,964) |
| Agents' commission | (208,439) | (111,867) | (40,673) | (1,390) | (362,369) |
| Net gaming revenue (NGR) | 380,660 | 176,561 | 69,507 | (1,390) | 625,339 |

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 and TORA WALLET S.A.

| FOR THE PERIOD THAT ENDED ON 31 DECEMBER 2016 | Greece | Cyprus | Intercompany Transactions | Total |
|--|-----------|---------|------------------------------|-----------|
| Amounts wagered | 4,001,928 | 228,047 | - | 4,229,974 |
| Revenue (GGR) and Other operating income | 1,463,184 | 76,391 | (33,548) | 1,506,027 |
| Net gaming revenue (NGR) | 529,925 | 43,100 | 22 | 573,047 |
| Segment Assets | 1,902,581 | 294,847 | (429,754) | 1,767,675 |
| Segment Liabilities | 700,863 | 27,400 | (32,820) | 695,443 |

| FOR THE PERIOD THAT ENDED ON 31 DECEMBER 2015 | Greece | Cyprus | Intercompany Transactions | Total |
|--|-----------|---------|------------------------------|-----------|
| Amounts wagered | 4,039,951 | 217,366 | - | 4,257,317 |
| Revenue (GGR) and Other operating income | 1,491,136 | 74,530 | (37,333) | 1,528,334 |
| Net gaming revenue (NGR) | 584,284 | 41,024 | 30 | 625,339 |
| Segment Assets | 1,817,452 | 161,754 | (270,373) | 1,708,833 |
| Segment Liabilities | 513,358 | 31,116 | (38,468) | 506,006 |

4.Glossary

Please pay attention to the following, frequently used terms:

| TERM | Refers to |
|---|---|
| 'Agent' | The individuals associated exclusively with OPAP on activities related to gaming and handle, through their agencies, the placement of the company's games to the Greek market. |
| 'Carbon dioxide', 'CO ₂ ' | The gaseous chemical compound derived from the combustion of fossil fuels (oil, gasoline, natural gas, etc.) and organic compounds (wood, plastic, etc.), which contributes to the greenhouse effect. |
| 'Company', 'we', 'OPAP' | OPAP S.A. and its subsidiaries OPAP Services S.A., Hellenic Lotteries S.A., Horse Races S.A. and Tora Direct S.A. |
| 'Corporate Social Responsibility' or 'Corporate Responsibility' | The voluntary commitment of companies to include in their corporate practices economical, social and environmental criteria and activities, which are beyond the legislative requirements and are related to their impact on stakeholders. |
| 'Environmental footprint' | The total greenhouse gas emissions arising directly (e.g. burning of fossil fuels for heating) or indirectly (e.g. by the use of products) from a company. |
| 'Fixed odds betting' | The form of form of wagering against odds offered by a bookmaker. |
| 'Global Compact' | The United Nations Global Compact, an initiative to encourage companies and organizations worldwide to adopt sustainable and socially responsible policies, as well as to report on their implementation, stating ten principles in the areas of human rights, labor, the environment and anti-corruption. |
| 'Group', 'OPAP Group' | The OPAP Group of Companies, which includes OPAP S.A. (parent company) and its subsidiaries OPAP Sports LTD, OPAP Cyprus LTD, OPAP Services S.A., OPAP International LTD, OPAP Investment LTD, Hellenic Lotteries S.A., Tora Direct S.A., Tora Wallet S.A. and Horse Races S.A., as well as the affiliated companies Neurosoft S.A. and Glory Technology LTD. |
| 'Mutual betting' | The form of wagering in which all bets of a particular type are placed together in a pool and payoff odds are then calculated by sharing the pool among all winning bets. |
| 'Player' | The end users of our products and services. |
| 'Sales network' | The Points of Sale of our games. |
| 'Report' | The Integrated Report 2016. |
| 'Universal Declaration of Human Rights' | The declaration adopted by the United Nations General Assembly in 1948 and consists of thirty articles, representing the global expression of rights to which all human beings are inherently entitled. |
| 'II-2', 'V-2' etc. | The area and section of this Report (e.g. used in the GRI, Global Compact and Stakeholder Tables). For example, the term 'V-2' makes reference to area 2 (Player Protection), section 2 (Responsible Advertisement). |

5. Feedback Form

1. TO WHICH STAKEHOLDER CATEGORY DO YOU BELONG?

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

2. WHAT IS YOUR IMPRESSION, ABOUT THE FOLLOWING AREAS OF THIS REPORT?

| Area: | Excellent | Good | Neutral | Mediocre | Bad |
|-------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| I. Who we Are | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| II. Internal Operation | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| III. Customer Service | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| IV. Network Development | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| V. Player Protection | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| VI. Society Support | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| VII. Employee Care | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| VIII. Financial Results | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

3. WHAT IS YOUR IMPRESSION, ABOUT THE FOLLOWING ELEMENTS OF THIS REPORT?

| Area: | Excellent | Good | Neutral | Mediocre | Bad |
|------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| Sections have the right balance | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Important topics are covered | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Structure supports easy reading | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Texts are comprehensive | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Quantitative elements are complete | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Graphs included are comprehensive | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Layout is attractive/pleasant | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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

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

Personal Data (optionally):

Name: _____
Organization: _____
Address: _____
Phone/Fax: _____
E-mail: _____

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

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112, Leoforos Athinon, 10442, Athens, Attica
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All information on this form will be used only for evaluating this Report, through statistical analysis. Personal data are protected, as defined by the respective law regarding private information.

INTEGRATED **ANNUAL REPORT 2016**

Data presented within Annual Integrated Report 2016
were gathered in cooperation with all departments of OPAP Group.

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DESIGN CARTEL

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