

Policy on Granting Winnings Certificates of OPAP Group

1. Purpose and Scope

OPAP Group, in alignment with decision no. 554/5/15.04.2021 of the Hellenic Gaming Commission (HGC), as amended and applicable, as well as with its Directive 1/2023, shall grant, for tax use, following the request of any beneficiary and holder of a Greek TIN, a Winnings Certificate for the right previous fiscal year (fiscal year “N-1”) of the one of the request submission (fiscal year “N”), for the entirety of the eligible winnings (set out per case below, in Chapters 3, 4) that derived from the gaming Activity of the applicant during such period (of fiscal year N-1), in companies OPAP S.A., HELLENIC LOTTERIES S.A., and HORSE RACES SINGLE MEMBER S.A.

The relevant requests for the granting of a Winnings Certificate on behalf of beneficiaries shall be submitted exclusively remotely (through the Internet), once a year. In particular, the said requests shall be submitted through website <https://winningscertificates.opap.gr>, until the 31st of October of each year. The deadline for the online request submission may be extended upon Company’s decision, which shall be communicated through its website, www.opap.gr. In no case shall the Company issue a Certificate for winnings paid prior to the fiscal year exactly preceding the one of the request submissions (e.g. the Company shall not grant any Winnings Certificate for winnings of fiscal year N-2).

The Compliance Officer (AML/CFT), along with the specialized operational team which he commands, shall bear the responsibility of receiving and processing the said requests, as well as the responsibility to grant the respective Certificates (provided that the conditions set out below are met).

2. Definitions and Abbreviations

OPAP Group	OPAP S.A., Hellenic Lotteries S.A., Horse Races Single Member S.A.
HGC	Hellenic Gaming Commission
TIN	Tax Identification Number
VLT	Video Lottery Terminal
Tax Office	Public Taxation Office
Compliance Officer (AML/CFT)	The person appointed by each one of OPAP Group's Obligated Persons to be responsible against money laundering and the financing of terrorism. The said person shall be appointed in the said capacity by the Obligated Person, according to article 4, and exercise the duties of article 5 of HGC Decision no. 554/5/15.4.2021.
AML/CFT	Anti-Money Laundering / Counter Terrorism Financing
Obligated Person	The person Organizing or Conducting Games of Chance in the Greek Territory, including the Physical Network, as well as Casino Enterprises. In the case of OPAP Group, the Obligated Persons operating in the field of Games are OPAP S.A., Hellenic Lotteries S.A., and Horse Races Single Member S.A.

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3. Winnings Certificate of Games of Chance conducted Online or through an Individual Player Card (Named Participation Games)

As regards games conducted online or through an Individual Player Card (for participation in games through VLT-type gaming machines), the Group shall grant, following the request of any beneficiary, a Winnings Certificate for the entirety of the net winnings after taxes and participation cost that occurred, based on his/her total relevant Gaming Activity during the preceding fiscal year (N-1) from the one of the submission of the request (N). Therefore, a condition for the granting of a Winnings Certificate shall be the positive result after the deduction of the total betting cost and the taxes from the total gross winnings.

In any case, a relevant Winnings Certificate shall be granted only if the applicant, when submitting the winning participation, was over the minimum age of 21 years (unless otherwise specified in the Regulatory Framework governing the games of OPAP S.A.). For winnings deriving from entries submitted by the interested person while not meeting the requirement above, no Winnings Certificate shall be issued.

Moreover, in case of winnings from games conducted through VLT-type gaming machines, the interested person shall have declared his/her TIN to stores of the relevant network or to the call center of OPAP S.A. prior to the submission of his/her request.

4. Winnings Certificate of Land-based Games of Chance (Anonymous Participation Games)

As regards games conducted through the land-based network and in which participation is mainly anonymous (thus, with the exception of games that require the existence of an Individual Player Card), a Winnings Certificate shall be issued for the entirety of the winnings that derive from tickets of gross winnings of at least one thousand (1,000) EUR each, which have been collected during the right previous fiscal year (N-1), under the condition that the repayment of the respective tickets has been conducted by issuance of a relevant payment order to a bank and the Player has paid the said order to one of the cooperating Credit Institutions. Therefore, a condition for the eligibility of the said winnings for the granting of a Winnings Certificate shall be their repayment through the cooperating Credit Institutions.

Upon every online request for the granting of a Winnings Certificate, based on the declared Player's TIN, the entirety of payments of winnings conducted exclusively through Payment Service Providers during the right previous fiscal year is automatically retrieved, as such payments are included in the held record of winnings payments of the Group's Companies. In case payments are detected that concern winnings having been paid by all three Companies of the Group, three requests (one for each Company) shall be systemically created, and three different Winnings Certificates shall be issued, namely one for OPAP S.A., one for HELLENIC LOTTERIES S.A., and one for HORSE RACES SINGLE-MEMBER S.A., with the entirety of the individual payments concerning each Company.

In any case, as regards land-based games, a relevant Winnings Certificate shall be granted only if the applicant, when submitting the winning participation, was over the minimum age of 18 years (unless otherwise specified in the Regulatory Framework governing the games of OPAP S.A.). For

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winnings deriving from entries submitted by the interested person while not meeting the requirement above, no Winnings Certificate shall be issued.

Moreover, as regards the granting of a Certificate of Winnings that derived from games not supporting group participation at the moment of payment of the respective consideration (e.g. STOIXIMA, KINO, SCRATCH, Ethniko/ Laiko Lottery), but allowing the proportional division of potential winnings later on, provided that a relevant Solemn Declaration of Co-beneficiaries (according to the specific provisions in the relevant winnings payment process <https://corporate.opap.gr/winnings-payment-circular>) has been timely submitted, the Winnings Certificate may be granted to each one of the co-beneficiaries exclusively under the condition that the above process of division of the relevant winnings has been observed and that each one of the co-beneficiaries has submitted a request, according to the specific provisions of the present by using the below corporate website: <https://winningscertificates.opap.gr>.

5. Certificate of Winnings Deriving from A Mixed (Anonymous and Named) Participation in Games

Provided that, as regards a specific applicant, there are winnings deriving from both games conducted through the land-based network of OPAP agencies (having been collected exclusively through Payment Service Providers), and from games conducted online or through an Individual Player Card, a single Winnings Certificate shall be issued in the name of the applicant, which shall include the entirety of the amounts per case that derived from each participation category.

6. Winnings Certificate - Individual Features and Conditions for Granting

As it has already been mentioned, the winnings certificate shall be exclusively granted to Players having a Greek TIN, and shall at least mention the following:

- a. The details and the number of the Player's ID card or passport.
- b. His/her Tax Identification Number
- c. Date of birth
- d. Home address
- e. Contact phone number
- f. In separate parts:
 - aa. The Total Amount of Gross Winnings (Before Taxes) that was attributed.
 - bb. The Total Cost of Participation in Games.
 - cc. The Total Amount of Net Winnings (Before Taxes) that was attributed.
 - dd. the Total Withheld Tax on the Winnings that was attributed.
 - ee. the Net Winnings that the Player Collected, after deducting the withheld tax and the amount he/she spent on his/her participation.

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The Group shall bear no responsibility as regards the correct presentation of the above details on the tax statement of each Certificate's beneficiary.

For the granting of the Winnings Certificate, the following are mandatorily required:

1. The creation of an individual electronic account on website <https://winningscertificates.opap.gr>, through which the applicant may submit his/her request. Upon submission of the request, all personal details of the applicant shall be mandatorily declared, as well as the details of the procedural representative (e.g. lawyer, accountant or any other person), provided that such person has been appointed (full name, profession, phone number, e-mail and TIN).
2. The certification and verification of the individual details of the applicant Player. In particular, the electronic registration and attachment of all necessary pieces of information and supporting documents are required for this purpose, in accordance with Annex II of HGC decision, and more specifically: a) The latest tax return document of the applicant, and b) a Solemn Declaration (article 8 of L. 1599/1986) including: the Player's personal details, e-mail, exercised profession, as such are declared by the Player upon creation of his/her Individual Player Account, the details of the procedural representative, if appointed, the exact text as indicated by the provided instructions in the page of Player's profile, in the relevant platform. The Solemn Declaration shall have been issued through gov.gr, or the originality of the signature of the Player in the Solemn Declaration shall have been validated by a competent authority. In the second case, a copy of both sides of his/her ID card shall be also attached to the same file of the Solemn Declaration. OPAP Group reserves the right to ask, at any time, at its discretion, for additional details and documents from the eventual applicant to safeguard the provisions of the regulatory framework on anti-money-laundering.

In the case of co-beneficiaries, a separate online Winnings Certificate request shall be submitted by each co-beneficiary through website: <https://winningscertificates.opap.gr>.

The verification process of a Player's identity shall be repeated whenever there are doubts regarding the accuracy and completeness of the data provided.



If the details filled in the online request are proven to be false or inaccurate upon checking, or if it derives from the analysis of payments that the due processes regarding the entries, the games and the payments of the corresponding amounts were not observed, the Winnings Certificate shall not be granted.

Concerning every online request for a Winnings Certificate that is approved by OPAP Group, an update shall be sent to the declared e-mail address of the applicant (and of the procedural representative, if appointed), who shall then log in the platform to complete the process of Certificate receipt. The online file shall be kept in the requests history of the Player for any future use, for a period not exceeding two (2) years. Beyond that period, the Player shall not be able to find and print the file of the complete Certificate out of his/her requests history in the platform.

OPAP Group, also according to the provisions of the relevant HGC regulatory framework, shall reserve the absolute right to reject a Winnings Certificate granting request in case the conditions of Player's identity certification and verification have not been met, as well as in case it knows or has serious indications or suspects that the Player aims, through his/her Gaming Activity, at money laundering or financing of terrorism. The applicant shall be informed of the rejection of his/her request through an automated e-mail to be directly sent by the platform.

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7. Records

s/n	Record Title	Record Type		Retention Time	Responsible
					
1	Requests and Winnings Certificates (platform winningscertificates.opap.gr)	✓		2 years	AML Team

Annex 1(13/12/2023): Certification and verification of Player's identity upon issuance of the Winnings Certificate

The minimum information required for the certification of the identity of the Players upon issuance of Winnings Certificates (according to HGC decision with no. 554/5/15.04.2021), as well as the required documents for the verification of the aforementioned information, are, indicatively, the following:

DETAILS FOR THE CERTIFICATION OF THE PLAYER'S IDENTITY	INDICATIVE DOCUMENTATION FOR THE VERIFICATION OF THE PLAYER'S IDENTITY (INDIVIDUALLY OR JOINTLY, AS APPROPRIATE PER CASE)
Full name and father's name	ID card or valid Passport
ID card or passport number and issuing authority	Identity of persons serving in the Police and in the Army (Military Identity Card)
Date and place of birth	
Current home address Contact phone number	Recent phone, power, water supply bill Lease Agreement submitted to the tax authorities (Tax Office) Tax return document or other documents issued by the Public Taxation Office (Tax Office) License of permanent residence in Greece, in force
Profession	Employer's certification Tax return document or other documents issued by the tax authorities (Tax Office) Copy of recent salary bill Professional identity/ General Commercial Registry (GEMI) Certificate Insurance body document
Tax Identification Number (TIN) Social Security Number	Tax return document or other documents issued by the tax authorities (Tax Office)

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