



Sazka
GROUP



OPAN



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**CORPORATE SOCIAL
RESPONSIBILITY REPORT**



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SAZKA Group a.s. (“SAZKA Group” or the “Company”, and together with its relevant subsidiaries and equity affiliates as defined below the “Group”) publishes its Non-financial information for the year 2019 pursuant to Act No. 563/1991 Coll., on Accounting, as amended (“CSR Report” or the “Report”).

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OUR BUSINESS

SAZKA Group is one of the largest pan-European lottery operators. Its businesses run lotteries in all the major continental European countries where lotteries are privately operated, including the Czech Republic, Greece, Austria, Italy, and Cyprus. Its businesses focus on the lottery segment, including numerical lotteries (draw-based games) and instant lotteries (scratch cards), while also providing complementary products in sports-betting and digital-only games. They sell their products both through extensive retail networks and digital platforms. All its lottery operators are members of the World Lottery Association and the European Lottery Association and operate in accordance with their codes of practice.

For purposes of this Report, the materiality principle is applied in accordance with Guidelines on non-financial reporting (methodology for reporting non-financial information), 2017/C 215/01, issued by the European Commission. Material non-financial information is defined as information 'necessary for an understanding of the [...] impact of (the Company's) activity'. Therefore, this Report will consider non-financial information on SAZKA Group's most significant subsidiaries, namely SAZKA a.s., OPAP S.A. ("OPAP"), Casinos Austria AG ("CASAG") its subsidiary Österreichische Lotterien GmbH ("Austrian Lotteries") and LOTTOITALIA S.r.l. ("LOTTOITALIA") as these companies represent the vast majority of SAZKA Group's activities and assets.

Our abovementioned businesses are supported by iconic and long-established brands, unrivalled POS networks and a long history of operations. 100 per cent of our gaming activities are regulated. They operate under long-term and, in many cases, exclusive licences and concessions, which have allowed them to enjoy leading and, in many cases, exclusive positions in all the markets in which they are present.

- In the Czech Republic, SAZKA a.s. is the market leader for both numerical lotteries and instant lotteries.
- In Greece, OPAP has exclusive licences to operate lotteries, land-based sports-betting, and VLTs. OPAP also has a licence to operate lotteries in Cyprus.
- In Austria, we have minority interests in CASAG and its subsidiary Austrian Lotteries, which are the exclusive operators of lotteries, land-based casinos and onshore online gaming.
- In Italy, we have a minority interest in LOTTOITALIA, a joint venture which is the exclusive operator of fixed odds numerical lotteries.

For the year ended December 31, 2019, we estimate that SAZKA a.s. had a 94 per cent market share of GGR in numerical lotteries and a 100 per cent market share in jackpot lotteries in the Czech Republic as a result of SAZKA a.s. being the sole provider of this product.

OPAP had a 100 per cent market share of GGR in lotteries in Greece as a result of its exclusive licence.

CASAG and its subsidiary Austrian Lotteries had a 100 per cent market share of GGR in lotteries, casinos, online lotteries and regulated online casino in Austria as a result of its exclusive licences for these products.

According to H2 Gambling Capital, 2020, LOTTOITALIA had an 80 per cent market share of GGR in numerical lotteries and a 100 per cent market share in fixed-odds numerical lotteries in Italy as a result of its exclusive licence for this product.

Lastly, regarding the specific nature of our business model, SAZKA Group acknowledges and recognizes the importance of social responsibility of our businesses resulting from the nature of their operations. Thus, our Group places particular emphasis on player protection, responsible gaming, data protection and on anti-money laundering and anti-bribery and anti-corruption policies. The Group maintains the highest level of player protection and data security, as evidenced by various certificates awarded to companies within the Group by leading industry bodies. Additionally, our Group always strives to be innovative and to implement the latest best practices to meet our abovementioned social responsibility commitments.



OUR SOCIAL RESPONSIBILITY: SUPPORTING SOCIETIES WHERE WE OPERATE



SPORTS

All over the world the gaming companies have always been traditional supporters of sport. SAZKA Group and its businesses are major sponsors of professional and mass sport. Be it through support for Olympic teams or professional football and basketball teams or programmes for kids' after-school activities, we aim to help keep the populations of the countries where we operate healthy and active.

SAZKA a.s. is a major supporter of youth sports in the Czech Republic.

Around 150 thousand children participate in the Sazka Olympic multi-contest every school year. More than 1,200 elementary schools participate in this nationwide programme.

Children participate in a number of sporting disciplines which teachers directly incorporate in the physical education curriculum. Each child receives an Olympic diploma, which includes an analysis of the child's sporting talents and recommendation for sports to pursue further. The highest-ranking children compete against each other in district and regional rounds, with the winners advancing to the national finale.

Furthermore, around 15,000 Czech sports clubs are interconnected thanks to SAZKA a.s.' unique database called Sports around you. More than 400 events are offered and advertised through this platform every month.

Last but not least, 2,700 children were supported by Czech Olympic Foundation to allow them to do their favourite sports. This mainly includes support to socially disadvantaged children.

OPAP Sports Academies programme

In 2019, OPAP continued the OPAP Sports Academies programme for the fifth year. Its objective is to instil the values of fair play, commitment, respect and team work in children.

Since the launch of the programme in 2015, OPAP has accomplished tangible results.

Among others:

- 210 amateur football academies participated in the programme,
- 36 Sports Academies Festivals have been organized all over Greece,
- over 40,000 children have participated and been supported through the programme's educational initiatives, experiential activities and sports festivals,
- 475 hours of coaching and 4,000 training hours for parents, children and coaches have been carried out.

Austrian Lotteries is firmly anchored to sports through the funding provisions in the Austrian Gaming Act and is the biggest supporter of sports in Austria.

Austrian Lotteries plays a crucial role in maintaining the diversity and substance of amateur sports in Austria. It also supports the nation's top athletes – who have a huge role model effect. Since 1986, Austrian Lotteries have provided €1.6 billion in funding of sports. This funding is not just the most important source of finance for Austrian athletes, it is also something they know they can rely on: each year, Austrian Lotteries makes a guaranteed contribution of at least 80 million euros to sports in Austria.

In recognition of its longstanding commitment to Austrian sports, Austrian Lotteries was honoured with the Austrian Federal Sports Organization's Sport Austria Award at the 2019 Sport Austria Summit. Austrian Lotteries is also a longstanding and proud partner of the Austrian Sports Aid Foundation, the Austrian Olympic Committee and the Austrian Paralympic Committee.

Only 20 per cent of schoolchildren in Austria do the minimum daily recommended amount of exercise¹. To help change this situation, the motion4kids initiative launched by CASAG in 2018 funds innovative projects that combine physical activity with modern communications devices like mobile phones and tablets.

LOTTOITALIA supports the development of a sport culture based on fairness and inclusion.

To this end, since 2015, LOTTOITALIA and Lottomatica, the Group's partner in LOTTOITALIA, together with the Italian Olympic Committee (CONI), have launched the project Vincere da Grandi, offering to kids (5 to 14 years old) living in certain disadvantaged neighbourhoods of the largest Italian cities the opportunity to practice sports for free, in a healthy social environment. The project is carried out with the participation of educators and high-level athletes. So far, Vincere da Grandi has involved more than 1,000 children and teenagers. In two cities, the project also engages with the mothers of the children, to support social integration and promote sports values.

¹Source: SportsEconAustria Institute for Sports Economics.





OUR SOCIAL RESPONSIBILITY: SUPPORTING SOCIETIES WHERE WE OPERATE



HEALTH

OPAP's children hospital renovation programme

Since 2014, OPAP has been supporting the Children's Hospital Renovation programme at the Aghia Sophia and Panagiotis & Aglaia's Kyriakou children's hospitals in Athens. These are the most important, largest and oldest children's hospitals in Greece, and treat children from all over the country. Both hospitals were constructed in the 1940s and were in a poor condition, with inadequate facilities and an unpleasant environment for their patients, their parents and medical staff.

Through this programme OPAP aims to:

- upgrade the hospitals' nursing units and outpatient clinics,
- create a pleasant environment to support and accelerate children's therapy,
- renovate the hospitals' premises, waiting and examination rooms and
- improve working conditions for the medical and nursing staff.

In 2019, both hospital buildings had 64 per cent of their renovation completed. A total of 24 renovation works that included 18 nursing units were completed, covering a total of 11,540 m² and with a capacity of 415 beds. Specifically, in 2019, the 2nd floor, Wing A, Nursing Unit and the Renal Dialysis Unit reception area at Panagiotis and Aglaia's Kyriakou Children Hospital and the 4th floor Nursing Units at Aghia Sophia Children Hospital were delivered.

OPAP has invested more than €14.5 million in the project to date.

2,505 Hours of Volunteering for Good Causes in Austria

CASAG's corporate volunteering programme was introduced in 2013 and provides all staff with time to demonstrate their personal commitment to society. Employees can spend up to five working days a year volunteering for a good cause. In 2019, CASAG and Austrian Lotteries Group staff spent a total of 2,505 hours volunteering through this programme, helping charitable causes like Caritas, the Hilfswerk humanitarian aid organization, the Diakonie social welfare charity, the Wiener Tafel food bank, the Austrian Red Cross or the e.motion-Lichtblickhof equitherapy centre for children in need.

CASAG also supports a number of health and research initiatives including NF Kinder, a non-profit association which supports people of all ages who suffer from neurofibromatosis. The funding provided is used to finance treatment, awareness raising measures and research in this field.

LOTTOITALIA's health programmes

LOTTOITALIA, as well as Lottomatica, the Group's partner in LOTTOITALIA, have a long-standing tradition of supporting social, and health related projects. For instance, LOTTOITALIA supports the Family Weekend project of the Dynamo Camp which provides "Recreational Therapy Programmes" for children and teenagers suffering from serious or chronic pathologies, during the treatment and the recovery phase. LOTTOITALIA contributes to cover the costs for family members who accompany the children at the camp, as families' support and wellbeing are considered an important part of the treatment and rehabilitation process of these patients.

Families are also at the heart of the New House of the Andrea Tudisco Foundation, called also La Tana Libera Tutti project. This residential dwelling hosts the families of paediatric patients suffering from serious pathologies, hospitalized mostly in the oncology,

haematology, cardiac and neonatal surgery departments of the main Roman hospitals, who cannot afford a flat rental or a hotel. Families can be accepted free of charge for long periods, up to 24 months. The foundation provides also assistance in terms of administrative paperwork and psychological support.



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OUR SOCIAL RESPONSIBILITY: SUPPORTING SOCIETIES WHERE WE OPERATE



2020: COVID-19 – KEY PROGRAMMES AND INITIATIVES

The companies of SAZKA Group have been helping their employees and communities to stay safe and healthy during the pandemic. Among others, they have carried out the following activities:

SAZKA a.s. delivered help to social workers and the elderly across the Czech Republic

SAZKA a.s. used its fleet of company cars to deliver coronavirus SARS-CoV-2 test kits and other medical materials to social workers to ensure their safety at work.

After a successful trial operation in South and West Bohemia, the blue SAZKA delivery trucks took off to cover the entire Czech Republic. The drivers – volunteers from the SAZKA a.s. staff – delivered help to hundreds of social-care facilities across the Czech Republic.

SAZKA a.s. as the key partner of the COVID-19 fundraiser

SAZKA a.s. organised a fundraiser for Social Care Services and their clients. Donations from this fundraiser have been used to purchase protective equipment, disinfectants, and other medical material for clients in social care and the workers providing these services.

OPAP: Donation of medical supplies and equipment to support hospitals

At the outset of the pandemic in Greece, OPAP immediately sought to assist key workers in hospitals nationwide. OPAP donated 500,000 surgical masks and essential medical equipment through a body established by the Ministry of Health.

The donations have so far supported three key hospitals:

- The Attikon University General Hospital, which is dedicated to treating COVID-19 patients, was provided with 350,000 masks.
- The Aghia Sophia children's Hospital received 90,000 masks, while 60,000 masks were delivered to the Panagiotis & Aglaia Kyriacou General Children's Hospital.
- To cover the specific needs of the Panagiotis & Aglaia Kyriacou children's hospital, OPAP also donated haemodynamic monitors and parameter monitors, which are used in Intensive Care Units, surgeries and hospital wards.

OPAP Forward: "Doctor Anytime" coronavirus response

The companies participating in the OPAP Forward programme, which supports young entrepreneurs, have taken an active role in the fight to contain the spread of the virus.

Doctor Anytime has been part of OPAP Forward since 2017, helping more than 7 million people find the right doctor. During the pandemic, they have used their digital platforms to urge people to stay at home, while providing specialized medical advice.

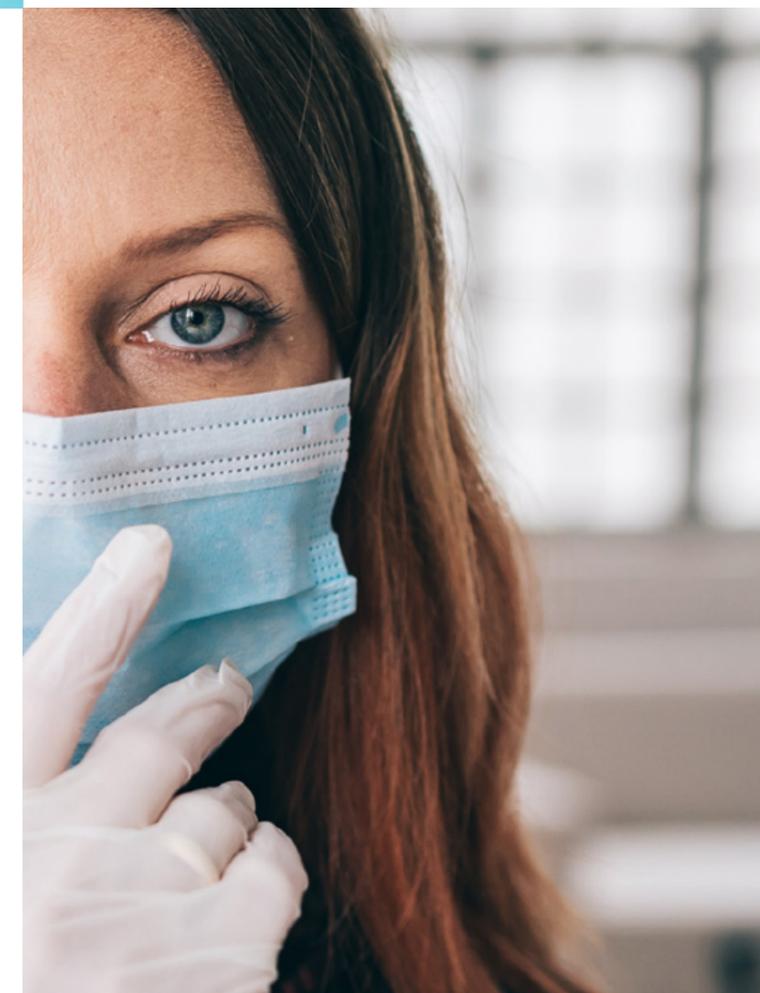
CASAG: #wecarrymasks campaign

In April, CASAG launched the #wirtragenmaske (we carry a mask) campaign, which was supported by popular Austrian celebrities from the fields of culture and sports. The campaign called on people in Austria to wear masks in public, and CASAG is now equipping over 5,000 retail locations with protective masks and hand sanitiser.

<https://www.wirtragenmaske.at/>

LOTTOITALIA

In Italy, in the context of the coronavirus crisis, the lockdown and the progressive phasing out of the restriction measures, LOTTOITALIA provided a dedicated web-page on detailed practical information reflecting the relevant decisions and communications by the Agency for Customs and Monopolies (ADM) on the management of the COVID-19 crisis. It includes information related to the permitted games, the modalities for playing and for collecting the winnings and is regularly updated.



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SPECIFIC NON-FINANCIAL KPIs RELEVANT TO OUR BUSINESS

RESPONSIBLE GAMING

We strive to protect the general public and especially vulnerable social groups from excessive gaming and prevent minors from any participation in games of chance. Responsible gaming is at the core of our culture. We take steps to promote responsible gaming behaviours and are committed to having a positive impact on local communities.

The Group regards the responsible gaming aspects of our business model as being the most material element of our risk assessment (in terms of non-financial risks), problem gambling topics in particular, even though by their nature, lottery games, which are the cornerstone of our business, are the most socially acceptable form of gaming as they involve periodic payments of small amounts to participate in infrequent games. All SAZKA Group companies seek to establish an environment in which a fair, reliable and safe gaming experience is provided and our lotteries are all operated under the World Lottery Associations ("WLA") and European Lottery Association ("EL") responsible gaming standards. All SAZKA Group companies offering lotteries have been awarded the Level 4 Responsible Gaming Certification, the highest level of responsible gaming certification issued by the WLA².

SAZKA A.S.

SAZKA a.s. applies responsible gaming principles throughout its operations. In October 2017, on top of the highest WLA responsible gaming certification SAZKA a.s. was awarded the European Lotteries Association Responsible Gaming Certificate confirming the company's compliance with the European Lotteries Association standards.

Within the complex set of requirements of EL /WLA Frameworks SAZKA a.s. builds its responsible gaming policy on two pillars, precise examination of its

products and its potential effect on players behaviour, and open dialogue and education of players and other stakeholders. Another important part of SAZKA a.s. responsible gaming strategy is its financial support to local organisations which are providing therapy, education and prevention in this field.

As part of mitigating the effects of problem gambling, SAZKA a.s. allows its customers to request voluntary self-exclusion from participating in gambling. Self-exclusion is always unlimited in time. The customer can request the termination of self-exclusion no earlier than one year after his request.

SAZKA a.s. organizes regular training programmes for employees, especially those in direct contact with customers and key functional groups e.g. sales and sales-support teams, game and channel design teams, marketing and advertising functions, and regulatory and compliance teams.

OPAP

Through its Code of Conduct and the Communication and Advertisement Policies included in its Responsible Gaming Policy, OPAP ensures that all its advertisements and commercial communication announcements a) are legal, fair and truthful, b) comply with the relevant regulatory framework and c) respect the principles of responsible gaming. All commercial communication activities are approved by the competent regulatory body (Hellenic Gaming Commission-HGC and/or the three-member Committee of article. 28, para. 3A of L. 4002/2011) and are always decent, fair to participants, respect participants' personal data and conform to the current regulatory framework and corporate policies in force.

Only customers who have set up a gaming card and set a self-imposed limit on time and money spent are allowed to play in OPAP's gaming halls². The maximum bet per spin is €2.00 for all games.

²In the case of LOTTOITALIA, Lottomatica, the Group's partner in LOTTOITALIA, is the certified entity.

CASAG AND AUSTRIAN LOTTERIES

Responsible gaming is a fundamental principle of business at CASAG and its subsidiaries, including Austrian Lotteries. Player protection is established practice in all companies in the group, and the corresponding measures and activities take many different forms. Comprehensive information and awareness-raising for players and customers, education and training for staff and retail partners, and an extensive range of measures and activities to protect minors as well as all other players and customers are the cornerstones of CASAG's approach to responsible gaming.

All new Austrian Lotteries retail partners are required to complete a Responsible Gaming Basic Training course prior to commencement of their contract. This course is available online to staff in all Austrian Lotteries retail outlets via their online sales terminals. All retail partners receive additional face-to-face responsible gaming training from our field sales representatives at least once a year and are also required to complete an annual responsible gaming training course via the online terminals. Some 16,000 Responsible Gaming Basic Training certificates were issued to retail partners in the reporting year.

Access to CASAG's casinos is restricted to persons over the age of 18. An official photo ID is required to gain admission to the casinos, and guests must check in at the reception desk every time they visit one of the casinos or WINWIN outlets. The minimum/maximum bets per game at WINWIN outlets are 10 cents/10 euros respectively, and the maximum amount that can be won on a VLT game is €10,000. The sale of Austrian Lotteries' lottery products or pay-out of lottery prizes is restricted to persons over the age of 16. The sale of tipp3 sports betting products, participation in the online games on the win2day site and purchase of prepaid vouchers are all restricted to persons over the age of 18.

Pursuant to the provisions of Art. 25 (3) of the Austrian Gaming Act, CASAG's physical outlets monitor visit frequency and gambling intensity for all guests. Should there be reasonable cause to suspect that a guest's visit frequency or gambling intensity does not reflect their financial circumstances, a credit check is obtained from one or more independent credit rating agencies. In 2019, a total of 1,666 counselling interviews were held and 8,749 restrictive measures taken in our casinos and WINWIN outlets across Austria. 4,399 self-exclusion orders were likewise received and enacted in these operations. In 2014, CASAG became the first gaming company worldwide to obtain certification according to the Responsible Gaming Standards developed by the European Casino Association. Following an external audit in 2017, this certification was reissued for a further three years.

LOTTOITALIA

LOTTOITALIA is committed to a strong and comprehensible responsible gambling policy. Further to full compliance with the applicable legal requirements concerning, among other things, legal minimum age to access its products (18 years), advertising restrictions and protection of personal data LOTTOITALIA invites players to follow certain behavioural practices to ensure that they stay in control of their gambling activity.

Risk assessment

Among the Group's activities, which may present a certain risk to wider society, belong primarily operating casinos, video lottery terminals ("VLTs"), sports-betting, instant lotteries (scratch-cards) or digital instant games. Excessive play without timely intervention, and if not properly managed, may lead to adverse impact on individuals and society (e.g., in form of gambling related harm). This risk is increased when the underage play is not prevented. Conscious of these risks, the Group emphasize accordingly the responsible gaming and player protection principles and puts in place state of art controls and procedures which aim at prevention of and timely identification of gambling related issues among their customers (as evidenced by the certificates and standards awarded to companies within the Group). The Group continually monitors outcomes of these policies and trains its staff to recognize potential responsible gaming related risks. We will stay committed to observing and managing these risks in order to fulfil our wider social responsibilities and to protect interest of all stakeholders. The Group, also, puts considerable effort to contribute to our communities, beyond managing the risks, as we strive to have socially positive influence locally (please refer to the above).

SUPPLY CHAIN AND PROCUREMENT

In the Czech Republic, SAZKA a.s. selects its suppliers in the form of transparent tenders. In strategically areas, SAZKA a.s. strives to build long-term business relationships, which are reviewed at regular intervals according to the current situation. Data integrity and security, not least in the online world, are part of every supplier's selection criteria.

In Greece, OPAP acknowledges that its suppliers' activities and actions can influence its own responsible operation and therefore OPAP strives to build a sustainable supply chain. OPAP interacts with its suppliers in a transparent and objective manner and offers equal opportunities to all. OPAP utilizes its outreach and size to support the local economy in the areas it operates, by collaborating with local suppliers and purchasing locally produced products and supplies.



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SPECIFIC NON-FINANCIAL KPIs RELEVANT TO OUR BUSINESS

In Austria, CASAG carried out an in-depth analysis of its procurement practices for advertising and marketing materials in 2019 and defined a corresponding set of CSR criteria and guidelines. The new catalogue of CSR criteria is designed to assist the procurement officers in their decision processes regarding the selection of suppliers and materials. To ensure these criteria were clearly communicated to the suppliers, CASAG summarized these requirements and added them to its official Code of Conduct for Suppliers. This Code of Conduct for Suppliers ensures that CASAG only works with companies who meet its high quality standards and criteria.

ANTI-CORRUPTION AND ANTI-BRIBERY

SAZKA Group has adopted a comprehensive compliance system in accordance with the applicable laws and international standards, primarily focusing on anti-bribery and anti-money laundering measures. The compliance systems of SAZKA Group and of the operating companies strictly forbid giving or receiving bribes; this is supported by training of employees and managers via e-learning, KYC procedures, a whistleblowing line and guidelines regarding providing and receiving gifts.

Each operating company within the Group is responsible for compliance with the applicable local regulations and the requirements of the local gaming and other authorities. Operating companies thus have their own compliance systems according to their specific needs, local legal requirements, these systems having been approved/discussed with their respective regulators. The Company oversees that the operating companies fulfil their regulatory requirements and they have the appropriate measures and resources in place according to the Group's standards and best business practices.

In the Czech Republic, SAZKA a.s. has in place a Code of Conduct, which defines a set of principles and measures to prevent corruption at all levels. There are strict provisions for interacting with government

officials and prohibition on providing any form of gifts or hospitality to such persons. There are strict processes in place how to report and investigate any potential corruption related activity.

In Greece, OPAP's Code of Conduct also outlines that fraud, bribery and corruption in all forms are illegal and unacceptable. Stakeholders of OPAP Group should immediately report any concerns of fraud, bribery and corruption in accordance to the Whistleblowing Complaints Policy.

In Austria, CASAG has an extensive set of principles and measures in place to ensure that the group, its staff and, where appropriate, any third parties comply with all applicable anti-corruption provisions. The new ISO 37001 standard adopted by CASAG (anti-bribery management system) is a practicable tool used by organizations to critically assess their current risk situation and incorporate appropriate measures against corruption into their existing structures and processes.

Corruption or bribery incidences

Across all SAZKA Group companies, bribery and corruption in all forms are illegal and unacceptable.

In the Czech Republic, there were not any incidences reported, neither any investigation from Government nor other authorities were made. Therefore, there were not any convictions for bribery or corruption related topics against SAZKA a.s.

In Greece, there were no convictions for corruption or bribery against OPAP or its employees in 2019. Thus, the monetary value of fines or penalties (i.e. even if appealed) for noncompliance with laws and regulations regarding incidents of corruption and bribery (€) were zero.

In Austria, CASAG has an extensive set of principles and measures in place to ensure that the group, its staff and, where appropriate, any third parties comply

with all applicable anti-corruption provisions. In 2019, there were no convictions for corruption or bribery against CASAG group or its employees.

ANTI-MONEY LAUNDERING

In the Czech Republic, SAZKA a.s. amended and revised its internal policy (System of internal rules, principles and control measures against legitimisation of proceeds of crime and financing of terrorism) during 2019. This policy applies to all employees, agents and salesmen of SAZKA a.s. This internal policy is in alignment with local legislation governing Anti-Money Laundering/Combating the Financing of Terrorism (AML/CFT) and international sanctions – Act no. 253/2008 Coll., on selected measures against legitimisation of proceeds of crime and financing of terrorism and Act no. 69/2006 Coll., on Carrying out of International Sanctions. This revision introduced a comprehensive methodology for risk assessment, detailed processes for customer due diligence and setup control mechanism to monitor compliance with regulatory requirements in key areas within the company.

In Greece, OPAP has developed a policy on the 'Prevention of the use of gaming products for the purpose of money laundering and terrorism financing', which applies to all employees, agents and salesmen of OPAP products and is in compliance with the Hellenic Gaming Commission's Decision no. 129/2/2014, as currently in force. OPAP conducts regular AML audits to its network, in order to ensure their compliance with the aforementioned policy and the requirements of the regulatory framework. Furthermore, OPAP conducts full AML background checks on all new candidates that have expressed interest to become OPAP agents.

In Austria, through its audited management system for the prevention of money laundering and criminal activities, CASAG routinely assesses money laundering risks and provides regular anti-money laundering training courses. In this regard, CASAG works in close cooperation with the Money Laundering Department at the Austrian Federal Criminal Police Office (Bundeskriminalamt).

INFORMATION SECURITY AND DATA PROTECTION

In the Czech Republic, SAZKA a.s. is audited in information security management according to the ISO 27001:2013 standard and WLA's WLA-SCS: 2016 Security Control Standard. Furthermore, SAZKA a.s. also implemented a data leakage prevention solution for additional protection of customer data and sensitive business information. The company made additional steps in development of its Security Operation Centre and a new solution for vulnerability management was implemented to maintain high level of security of information systems on top of the existing measures such as periodic penetration testing. SAZKA a.s. further intensified training of its employees in information security and data protection by introducing random email phishing campaign tests.

In Greece, OPAP created a Data Protection Office and appointed a Data Protection Officer, in view of entry into force of the General Data Protection Regulation ("GDPR"). OPAP has adopted several new policies and procedures and revised all privacy notices to ensure full transparency of our processing activities. OPAP has implemented the appropriate technical and organizational measures. In addition, they conduct risk assessments and audits, on a regular basis, to identify and prioritize information security vulnerabilities and define appropriate risk treatment plans.

In Austria, Casino Austria's data protection and privacy management system has been audited and certified to the GoodPriv@cy standard since 2009. It was adapted to fulfil the new requirements introduced by the GDPR and recertified under these new parameters in May 2019. The SQS GoodPriv@cy Seal of Quality is an internationally recognized certification, whose primary aim is to reinforce public confidence in its holders by verifying their compliance with data protection (and thus also privacy) requirements. GoodPriv@cy audits were successfully carried out in 2019 at the headquarters of the largest operating entities, CASAG and Austrian lotteries as well as at certain casinos. Audits of the Group's compliance with the ISO 9001:2015 standard (quality management at CASAG), the ISO 27001:2013 standard (information security at Austrian Lotteries) as well as the World Lottery Association's WLA-SCS: 2016 Security Control Standard (Austrian Lotteries) were all likewise successfully completed in 2019.

Risk assessment

We assess the risk related to Information security and data protection as highly important. Our businesses are subject to regulation related to the use of customers' personal data and their debit and credit card information, including the obligation to keep the identity of winners confidential. Our businesses work with the sensitive personal data of customers and data about their agents, suppliers or employees. If the protection of personal customer data fails, our businesses could face liability and fines under data protection laws and loss of goodwill.

Our businesses have prepared contingency plans and implemented various mechanisms to prevent or mitigate the interruption of their technological infrastructure by the aforementioned events. Protection of personal data is covered by close cooperation between legal departments and data protection officers in the key subsidiaries and technology departments.



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ENVIRONMENTAL NON-FINANCIAL INDICATORS

ENERGY CONSUMPTION

SAZKA Group takes its environmental impact seriously and strives to minimise any potential negative impact.

In the Czech Republic, SAZKA a.s. makes effort to minimize its environmental footprint. Both the electricity consumption and car fleet fuel consumption are being monitored and optimised.

SAZKA a.s. energy consumption

Source	2018	2019
Diesel for vehicle fleet (lt)	300,280	255,655
Gasoline for vehicle fleet (lt)	36,321	89,276
Diesel for heating (lt)		
Diesel for generating sets (lt)		
Electricity (kWh)	2,966,275	2,864,320

In all its operating companies, SAZKA Group seeks to optimise its energy consumption and improve its overall energy efficiency.

In Greece, OPAP's primary focus has been on electricity consumption in their buildings with secondary focus on fuel consumption for heating and the vehicle fleet. While at first glance it may seem like

OPAP increased energy consumption relating to its business, the change in values is due to inclusion of a larger number of subsidiaries in the analysis (see the Note below).

OPAP's energy consumption

Source	2018	2019
Diesel for vehicle fleet (lt)	419,579	442,226
Gasoline for vehicle fleet (lt)	56,132	115,247
Diesel for heating (lt)	45,881	79,913
Diesel for generating sets (lt)	180	6,180
Electricity (kWh)	3,974,611	6,116,513

Note: 2018 data refers to OPAP S.A., Hellenic Lotteries S.A., OPAP Services S.A., Tora Direct S.A. and Tora Wallet S.A. only. 2019 data refers to the whole OPAP group.

In Austria, energy consumption for CASAG and Austrian Lotteries Group in 2019 consisted of:

- Electricity consumption for the operation of casinos, gaming halls outlets, computing centres, offices and a warehouse.
- Energy consumption for heating and cooling casinos, gaming halls outlets, computing centres, offices and the warehouse.
- Fuel consumption for sales trips by Austrian Lotteries sales representatives and for business travel.

CASAG's energy consumption

	2018	2019
Total energy consumption (MJ)	126,073,074	126,649,965

CASAG is currently working to improve the quality of this data. Some of the data available for the reporting year does not correspond to the actual reporting period used (2019), while some data (e.g. for thermal energy) were not yet available at the time of preparation of this Report.

Appendix II of the Austrian Energy Efficiency Act (Bundes- Energieeffizienzgesetz). The audit served to verify corporate and usage data as well as to identify further measures to protect energy savings (e.g. further optimisation of ventilation system operating periods at individual sites or replacement of cooling units).

In November 2019, CASAG and Austrian Lotteries underwent an energy audit pursuant to Art. 18 and

Risk assessment

SAZKA Group regards risks relating to environmental aspects to be relatively low (especially when compared to companies in other sectors of the economy). Our environmental impact is limited largely due to the nature of our business model. Nonetheless, in the future SAZKA Group intends to further optimise its environmental footprint in all of its current and future businesses, subject to our overall growth as a group, and to follow overall trend of environmental responsibility.



RESPECT FOR HUMAN RIGHTS AND DIVERSITY

It is a policy in all SAZKA Group's companies to make decisions regarding recruitment and selection, remuneration, career development and training, transfers, promotion and succession planning based solely on merit – being the skills, experience, qualifications and potential of the individual connected to the job – without regard to gender, age, sexuality, family circumstances, marital status, disability, religion, political preference, race, trade union membership or any other classification protected by applicable law.

In particular, with regard to gender equality:

- SAZKA Group's board of directors consists of three male members (Karel Komárek, Robert Chvátal and Pavel Šaroch) and one female (Katarína Kohlmayer).
- In the Czech Republic, the share of women in the overall workforce reached 39 per cent in 2019. 16 per cent of women worked on the managerial and director-level positions. We achieved an increase of number of women in the Technology division where the share of female colleagues reached 15 per cent.
- In Greece, OPAP's share of women in their overall workforce reached 39 per cent in 2019. 28 per cent of Team Directors and Team Heads were women as of 31 December 2019.
- In Austria, over 38 per cent of the workforce in CASAG were women and over 40 per cent of Heads of Departments were women in 2019. In Austrian Lotteries, the share of female sales representatives increased to 30 per cent in 2019.

Risk assessment

The risks related to human rights and diversity arising from our business activities are low. The Group implemented various codes of conduct and closely monitors potential violations of human rights. Despite our assessment that risks stemming from our activities in relation to human rights are low, SAZKA Group remains attentive to this area and we always strive to ensure that human rights are respected within the Group. SAZKA Group is also aware that diversity metrics (the ratio of women in senior management in particular) can be improved creating a more diverse business moving forward.

