





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 independent report on non-financial information for the year 2020, pursuant to the Section 32f et seq. of the Act No. 563/1991 Coll., on Accounting, as amended (the "CSR Report" or the "Report").

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OUR BUSINESS

SAZKA Group is a leading pan-European entertainment platform and the largest pan-European lottery operator. The Group operates lotteries in most of the European countries where lotteries are privately operated, including Austria, the Czech Republic, Greece and Cyprus, and Italy. The Group primarily focuses on lotteries, including draw-based and instant win lottery games, and distributes its products through both physical retail and online channels. The Group leverages its strong lottery brands, customer base and physical retail and online distribution networks to provide other entertainment offerings, including sports betting, online instant win games, online casino and VLTs.

In all of the countries in which it operates, the Group benefits from iconic and long-established brands, strong networks and a long history of operations. Its brands enjoy a high recognition in their respective markets, and its games are played by a large and broad player base, both in terms of gender and age, covering a substantial portion of the adult population.

Substantially all of the Group's gaming activities are regulated.

All the Group's lottery operations are members of the World Lottery Association and the European Lottery Association and operate in accordance with their respective codes of practice. In the case of LOTTOITALIA, Lottomatica, the Group's partner in LOTTOITALIA, is the certified entity.

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 and investees, namely Casinos Austria AG ("CASAG"), its subsidiary Österreichische Lotterien GmbH ("Austrian

Lotteries"), SAZKA a.s., OPAP S.A. ("OPAP") and LOTTOITALIA S.r.l. ("LOTTOITALIA") as these companies represent the vast majority of SAZKA Group's activities and assets.

Our abovementioned businesses 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.

OUR BUSINESS

- In Austria, the Group is the exclusive operator of lotteries and onshore iGaming and casinos and consequently has a market share of 100% for these products.
- In the Czech Republic, the Group is the market leader in both numerical lotteries and instant lotteries. For the year ended 31 December 2020, according to H2GC, the Group had a 94% market share (in terms of GGR) in numerical lotteries and a 86% market share in instant-win games.
- In Greece, the Group has exclusive licences to operate lotteries, sports betting (through the physical retail channel) and VLTs and consequently

has a market share of 100% for these products. It also has a licence to operate lotteries in Cyprus. In addition, through its recent acquisition of Stoiximan, the Group has a market-leading position in the complementary segments of iGaming in Greece and online sports betting in Greece and Cyprus.

- In Italy, the Group has a 32.5% interest in LOTTOITALIA, a joint venture which is the exclusive operator of fixed odds numerical lotteries and consequently has a market share of 100% for this product. For the year ended 31 December 2020, H2GC estimates that LOTTOITALIA had a 79% market share in numerical lotteries.

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, 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

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.

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 has provided €1.7 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 as Austrian Lotteries makes a guaranteed contribution of at least €80 million to sports in Austria. 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% of schoolchildren in Austria do the minimum daily recommended amount of exercise*. 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. Nearly 10 innovative projects have been supported so far: from smart activity trackers to apps designed to motivate children in a fun way to do more physical activity.

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 1,100 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 200 events are offered and advertised through this platform every month. Last but not least, 3,242 children were supported by Czech Olympic Foundation in 2020 to allow them to do their favourite

sports. This mainly includes support to socially disadvantaged children.

OPAP Sports Academies programme

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. In 2020, the program supported:

- 128 amateur football academies and 50 amateur basketball academies
- 18,000 young athletes
- over 28,000 parents and guardians, through trainings and seminars on psychological, paediatric and nutritional issues
- 1,000 academy coaches, through ongoing consultation, workshops and training sessions to enhance their technical knowledge

In 2020, OPAP developed the first and only platform in Greece, "Sport Academies Online", fully dedicated to young athletes, their parents and academy owners and coaches. The "Sport Academies Online" platform disseminated content on the nutrition, psychology and health of young athletes in collaboration with a dedicated scientific team as well as a group of highly respected athletes.

*Source: SportsEconAustria Institute for Sports Economics

OUR SOCIAL RESPONSIBILITY: SUPPORTING SOCIETIES WHERE WE OPERATE

HEALTH & OTHER

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.

Although it was unclear for a long time whether or in what form social assignments would actually be possible in 2020, the programme was continued. Thanks to these efforts staff members handed over food and staple products to the Wiener Tafel food bank and Red Cross. Chocolate bunnies purchased for an Easter promotion at our 12 casinos, which as it turned out had to close over the Easter period, were donated to facilities in the immediate vicinity such as the Neunerhaus shelter in Vienna, the Sozialmarkt (social grocery store) in Baden, the VinziTisch food sharing project in Salzburg, the hospital at Zell am See, as well as local emergency organisations.

To make it easy for staff members to contact social welfare organisations directly and offer support, relevant contact details were listed on the internal collaboration platform.



CASAG also supports a number of health and research initiatives. A new cooperation agreement was signed with IMBA – the Institute of Molecular Biotechnology, thus contributing to the research of biological mechanisms of addictive behaviour in the human brain. CASAG will continue this partnership in 2021.

OPAP's children hospital renovation programme

Since 2014, OPAP has been supporting the Children's Hospital Renovation programme at the Aghia Sophia and Panagiotis & Aglaïas 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.

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.

OUR SOCIAL RESPONSIBILITY: SUPPORTING SOCIETIES WHERE WE OPERATE

In 2020, over 82% of the renovation initiative in both building was completed. In total 26 renovation projects have been delivered, including 20 fully renovated nursing units, covering a total of 12,680 sq. meters, with a capacity of 459 beds. In 2020, despite the pandemic, OPAP delivered the renovation and modernization of the Ophthalmology and ENT Nursing Unit of the Panagiotis and Aglaia Kyriakou Hospital, as well as the Cardiology Unit of Aghia Sophia Hospital. By the end of 2020, €16.7 million had been invested in the program.

“OPAP Forward” Program

Faithful to its strategy of generating value for the Greek economy and society, OPAP

continued – for a fourth consecutive year – its “OPAP Forward” program, which supports small and medium entrepreneurship and employment. In 2020, the program welcomed ten new small and medium sized enterprises from productive sectors of the Greek economy, which have managed to demonstrate their ability to be dynamic and adaptable to the new circumstances created by the COVID-19 pandemic.

The program is being implemented in collaboration with Endeavor Greece and offers 12 months of continuous support and expertise for each company to design and implement a holistic strategic plan that addresses different business areas significant to their development. Endeavor

Greece is the local branch of the global Endeavor organization that supports the most promising companies worldwide helping them capitalize their potential through a unique network of seasoned business leaders. With Endeavor's support, the selected companies will be able to grow fast, create jobs and contribute to the growth of the economy as a whole.

According to data from Endeavor, the companies that have participated in the first three rounds of the “OPAP Forward” program have increased their total turnover by €113 million and created 1,590 new direct employment positions. Additionally, through further collaborations, 10,700 additional indirect jobs have been supported.



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:

CASAG: #wecarrymasks campaign

In April 2020, 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 equipped over 5,000 retail locations with protective masks and hand

sanitisers. The campaign helped to raise awareness of mask-wearing from an early stage.

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.

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 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.

Community Initiatives to Tackle the Pandemic

OPAP implemented a series of initiatives to address the impact of the COVID-19 pandemic in 2020. Specifically, aiming to contribute to the national effort to tackle the pandemic and assist the healthcare system nationwide, OPAP directly supported relevant efforts, by donating 500,000 surgical masks and required medical equipment for use by doctors and nurses of public hospitals. OPAP's donation was made through the support mechanism established by the Ministry of Health and benefited three hospitals.

In this framework, the Attikon University Hospital, which was dedicated to treating COVID-19 patients, was provided with 350,000 masks. Moreover, the Aghia Sophia Children's Hospital received 90,000 masks and the Panagiotis and Aglaia Kyriakou Children's Hospital received 60,000 masks. Covering specific needs of the Panagiotis and Aglaia Kyriakou Children's Hospital, OPAP also donated hemodynamic monitors for the monitoring of

OUR SOCIAL RESPONSIBILITY: SUPPORTING SOCIETIES WHERE WE OPERATE

vital body parts as well as vital sign monitors, suitable for use in Intensive Care Units (ICUs), surgery and hospital wards, among others.

As coronavirus cases continued to rise exponentially in Greece and especially in Thessaloniki, which was severely impacted by COVID-19, OPAP acted urgently to provide the following donations:

- Donation of medical equipment, specific to the urgent needs of the hospital, such as a mobile radiological unit, mobile ventilators, defibrillators, mobile ultrasound machine and high flow nasal cannulas for intubation, for Ippokrateio Hospital of Thessaloniki
- Donation of antiseptic solution for public schools, municipal cleansing services, public nurseries, etc., for the Municipality of Thessaloniki
- Donation of protective masks, gloves and antiseptics for the General Police Directorate of Thessaloniki

As demonstrated by the COVID-19 pandemic, strong support to nursing homes is critical to protect both residents and healthcare personnel. In this framework, OPAP donated hundreds of thousands of

gloves and protective masks for the emergency needs of social welfare institutions for the elderly through the Ministry of Labor and Social Affairs. The medical supplies were distributed to the social welfare centre facilities throughout Greece, as well as the Therapeutic Centre for Chronic Diseases of Evritania.

Additionally, with the support of OPAP, the Smile of the Child organization redirected mobile units used for the "OPAP in the Neighborhood" preventive medicine program, placing them at the disposal of the public health system to be used for urgent needs. Moreover, OPAP and doctoranytime,



The assessment of the institutions' needs was carried out in direct cooperation with the office of the competent Deputy Minister and the administrations of the institutions. The donation was implemented through the support mechanism established by the Ministry of Health at the beginning of the pandemic, aiming to provide practical support to the Greek society.

a member of the OPAP Forward entrepreneurship program, promoted the online service "speak with a doctor online" for people in need of doctor consultations. This service is a platform for communication and information that utilizes the network of certified doctors/partners of doctoranytime. In 2020, more than 50,000 people visited the platform and received information about COVID-19.

SPECIFIC NON-FINANCIAL KPIs RELEVANT TO OUR BUSINESS

RESPONSIBLE GAMING

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.

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.

Lottery games, which are the cornerstone of our business, are the form of gaming least associated with harmful behaviours 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 WLA (in the case of LOTTOITALIA, Lottomatica, the Group's partner in LOTTOITALIA, is the certified entity).

AUSTRIA

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 other players and

materials are checked according to the Responsible Advertising Policy. In this context 1,165 reviews were made.

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



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. Advertising

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 payout 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. CASAG's physical outlets monitor visit frequency and gambling intensity for all guests. Should there

SPECIFIC NON-FINANCIAL KPIs RELEVANT TO OUR BUSINESS

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 2020, a total of 552 counselling interviews were held and 6,119 restrictive measures taken in our casinos and WINWIN outlets across Austria. 2,726 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. The recertification audit for the European Casino Association's Responsible Gaming Standard was successfully completed in October 2020.

CZECH REPUBLIC

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 detailed set of requirements of the 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 financial support to local organisations which provide therapy, education and prevention in this field. 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 it is requested. 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.

SAZKA a.s. launched the project, Play wisely, which informs, allows self-testing and gives advice to players. It emphasizes gambling limits with tutorials and explanations and offers a map of addictology centers.

SAZKA a.s. also highlights 10 key points to follow in order to prevent excessive gambling.

GREECE & CYPRUS

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 i) are legal, fair and truthful, ii) comply with the relevant regulatory framework and iii) 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. 3 A 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.

SPECIFIC NON-FINANCIAL KPIs RELEVANT TO OUR BUSINESS

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 PLAY Stores. The maximum bet per spin is €2.00 for all games conducted via Video Lottery Terminals.

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) and digital instant games. Excessive play without timely intervention may lead to an adverse impact on individuals and society (e.g. in the form of gambling related harm). This risk is increased when underage play is not prevented. Conscious of these risks, the Group emphasizes responsible gaming and player protection principles and puts in place state of the 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 a socially positive influence.

SUPPLY CHAIN AND PROCUREMENT

In Austria, CASAG carried out an in-depth analysis of its procurement practices for advertising and marketing materials in 2019 and 2020 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.

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

In Greece and Cyprus, supplier diversity and equality are integral components in OPAP's effort to build a sustainable supply chain. OPAP's approach to supplier partnerships is founded on transparency, trust and equal opportunities for all. Therefore, the company capitalizes on its outreach and size to support local economies across the country, by collaborating with local suppliers for locally produced products and services. Additionally, being one of the largest companies in Greece, OPAP's size comes with the moral obligation to systematically disseminate, deploy and promote the principles of corporate responsibility throughout its supply chain.

SPECIFIC NON-FINANCIAL KPIs RELEVANT TO OUR BUSINESS

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 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 (antibribery 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. The certification audit for the ISO 37001 standard was successfully completed in October 2020.

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 with the Whistleblowing Complaints Policy

Corruption or bribery incidences

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

In 2020, there were no convictions for bribery or corruption related topics against SAZKA a.s., CASAG Group or OPAP.

SPECIFIC NON-FINANCIAL KPIs RELEVANT TO OUR BUSINESS

ANTI-MONEY LAUNDERING

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).

In the Czech Republic, SAZKA a.s. has an internal policy (System of

internal rules, principles and control measures against legitimisation of proceeds of crime and financing of terrorism). This policy applies to all employees, agents and salesmen of SAZKA a.s. Recent revisions 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. Due to the pandemic situation, the local regulator has issued some new guidance. SAZKA a.s. has introduced new procedures to handle such ad-hoc changes.

In Greece, OPAP has a policy regarding "Anti-Money Laundering and Counter Terrorism Financing Policy", which applies to all employees, agents and salesmen of OPAP products and is in compliance with the applicable legal and regulatory framework. OPAP conducts regular AML audits of 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 an interest in becoming OPAP agents. The company has a thorough Anti-Money Laundering and Counter Terrorism Financing (AML/CTF) compliance program which consists of the following basic pillars:

- A system of internal policies, procedures and controls
- A designated compliance function with a compliance officer
- An ongoing employee/agent training program
- An independent audit function to test the overall effectiveness of the AML program



SPECIFIC NON-FINANCIAL KPIs RELEVANT TO OUR BUSINESS

INFORMATION SECURITY AND DATA PROTECTION

CASAG's data protection and privacy management system has been audited and certified to the GoodPriv@cy standard since 2009. It was recertified in May 2021. 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 online and in person at the headquarters of the largest operating entities, CASAG and Austrian Lotteries as well as at certain WINWIN outlets. Audits of 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 2021.

In the Czech Republic, SAZKA a.s. is audited in information security management according to the ISO 27001:2013 standard and the WLA's WLA-SCS: 2016 Security Control Standard. SAZKA a.s. maintains and develops data leakage prevention solutions for



additional protection of customer data and sensitive business information. The company made additional steps in 2020 in development of its Security Operation Centre, Vulnerability Management System and threat intelligence.

All internet facing systems undergo periodic penetration testing. SAZKA a.s. performs periodic training and testing of its employees in information security and data protection. SAZKA a.s. also focuses on third party risks and cooperates very closely with its key vendors of gaming systems by performing audits and joint security exercises.

OPAP has several policies and procedures in place to ensure full transparency of all data

processing activities. OPAP has implemented appropriate technical and organizational measures. In addition, OPAP conducts risk assessments and audits, on a regular basis, to identify and prioritize information security vulnerabilities and define appropriate risk treatment plans.

In 2020, OPAP performed several actions, such as:

- Implemented an annual compliance program to achieve effective monitoring of compliance with data protection requirements
- Implemented appropriate technical and organizational measures to comply with the Data Protection Legal Framework

SPECIFIC NON-FINANCIAL KPIs RELEVANT TO OUR BUSINESS

- Conducted risk assessments and audits, on a regular basis, in order to identify and prioritize data security vulnerabilities and define appropriate risk treatment plans
- Executed data processing agreements with all suppliers who act as data processors and several controller-to-controller agreements in cases where disclosure of personal data to/from business partners is required

OPAP implements several security controls in order to prevent security breaches, such as unauthorized data retrieval, storage and accidental or intentional destruction of information. The purpose is to ensure confidentiality, integrity and availability of information, games' operation and customer service provision.

In 2020, all security operations were performed successfully against performance indicators regarding service downtimes, security testing, security incident service level agreements and security awareness.

OPAP's Information Security Management System has been certified in accordance with ISO 27001: 2013 Standard and WLA Security Control Standard: 2016 (WLA-SCS:2016), making OPAP the only Greek company that holds this certification. The certifications cover the design, development,

operation, management and security requirements for lotteries, fixed odds, mutual betting, numerical lotteries, sport betting and VLT operations. They are among the most acclaimed and demanding security standards internationally and affirm that OPAP's products comply with the most demanding information security and game integrity requirements. Additionally, they showcase a commitment to continuous improvement, as well as to developing leading products and services, which ensure customer satisfaction. The certification process, which required an extensive company-wide audit, was conducted by TUV Hellas.

OPAP's IT-security includes:

- A 24/7 Cyber-Security Operations Centre for prompt notifications on security alerts and corresponding incident response procedures
- Monthly automated scans on public-facing IT Systems, simulating a "hacker's eye" on the corporate digital footprint
- Incorporated the latest cyber-security tools and platforms to support the organization's evolving technology landscape

Risk assessment

We assess risks 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 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.



ENVIRONMENTAL NON-FINANCIAL INDICATORS

ENERGY CONSUMPTION

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

Our new head office, Bořislavka Centrum, incorporates the following environmental initiatives:

- The office complex was designed in accordance with LEED (Leadership in Energy and Environmental Design) Gold certificate criteria
- The lights outside the building will adjust based on the intensity of sunlight, in order to save energy

- The building will collect rainwater, which it will use to water the plants in the building and outside
- Parking beneath the office complex was designed in order to minimise emissions produced by the cars there
- The energy produced by braking elevators will be recuperated and used to power the elevators later in the day
- Bořislavka will have 20 charging stations available for electric cars, in the parking area

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

In Austria, energy consumption for CASAG and Austrian Lotteries Group in 2020 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	2020
Total energy consumption (MJ)	126,073,074	126,649,965	87,511,719

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 (2020), while some data (e.g. for thermal energy) were not yet available at the time of preparation of this Report and include estimated data. Total energy consumption includes estimated data from our casinos. Since the casinos were closed on so many days, they were estimated at minus 30% of the previous year's figures.



ENVIRONMENTAL NON-FINANCIAL INDICATORS

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

SAZKA a.s.' energy consumption			
Source	2018	2019	2020
Diesel for vehicle fleet (lt)	300,280	255,655	239,834
Gasoline for vehicle fleet (lt)	36,321	89,276	89,393
Diesel for heating (lt)	–	–	–
Diesel for generating sets (lt)	–	–	–
Electricity (kWh)	2,966,275	2,864,320	2,573,751

In Greece, OPAP's primary focus has been on electricity consumption in their office buildings with secondary focus on fuel consumption for heating and the vehicle fleet. Consumption figures are increased from 2019 onwards due to the inclusion of additional OPAP subsidiaries in the report (see the Note below).

OPAP's energy consumption			
Source	2018	2019	2020
Diesel for vehicle fleet (lt)	419,579	442,226	310,779
Gasoline for vehicle fleet (lt)	56,132	115,247	146,218
Diesel for heating (lt)	45,881	79,913	79,898
Diesel for generating sets (lt)	180	6,180	7,130
Electricity (kWh)	3,974,611	6,116,513	5,506,279

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 & 2020 data refers to the OPAP group excluding Stoiximan.

The numbers above do not include Stoiximan. Data concerning Stoiximan will be included in 2021 reporting

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 Austria, the COVID-19 pandemic and the internal ReFIT restructuring programme made 2020 one of the most difficult years in the Group's history. It was marked by working from home, short-time work due to the coronavirus pandemic, social distancing, distance learning for initial and continuing vocational

training, as well as the reduction of social contact to the level operationally necessary. This phase was accompanied by our efforts to secure as many jobs as possible. Staffing cuts that were ultimately necessary were organised with a view to making them as socially acceptable as possible. In addition to various severance models, a social compensation plan was also negotiated and amicable solutions were found for all staff reductions.

With regard to gender equality:

In the Czech Republic, the share of women in the overall workforce reached 40% in 2020. 15% of women worked in managerial and director-level positions. We achieved an increase of number of women in the Technology division where the share of female colleagues reached 20%.

In Greece and Cyprus:

- The number of females in the total workforce for OPAP Group was 38% and 42% for OPAP S.A.
- The percentage of female employees in all management levels (i.e. employees with at least one direct report) was 25% for OPAP Group and 32% for OPAP S.A.
- The percentage of female directors (excluding Top Management members, i.e. directors reporting directly to

the highest-ranking executive e.g. the CEO) was 28% for OPAP Group and 29% for OPAP S.A.

- The percentage of female top management members (i.e. directors reporting directly to the highest-ranking executive e.g. the CEO) was 20% for OPAP Group and 22% for OPAP S.A.
- The percentage of females in department managerial positions was 25% for OPAP Group and 34% for OPAP S.A.

The numbers above do not include Stoiximan. Data concerning Stoiximan will be included in 2021 reporting.

Risk assessment

The risks related to human rights and diversity arising from our business activities are low. The Group has 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.