

United Postcode Lotteries



7-Point Code of Conduct for Responsible Play

BACKGROUND

United Postcode Lotteries operate seven lotteries in five countries with over 12 million subscriptions. The Postcode Lottery format and related companies are owned by Novamedia, a Netherlands-based social enterprise which is 100% owned by a not for profit Foundation with the same name.

The shared mission is to contribute to a better world by raising funds for good causes through operating charity lotteries in a socially responsible way. Over the past 30 years, thanks to our participants, we have raised more than 10 billion euros for civil society. Our fundraising model supports unrestricted and long-term funding. Our lotteries are subscription based, where you sign up in advance to play, with no chance of instant gratification or reward because the draws take place on a weekly, or in most cases, monthly basis. Therefore, the time between subscription and outcome is long.

Lotteries are very low risk games as recognized by regulators and academics and it is clear that there are large differences between charity lotteries and betting companies, not just in terms of problem gambling risk but also regard to the reason for the product – charity fundraising versus private profit. Despite that we are committed to ensure our operations protect potentially vulnerable players and this code of conduct outlines our commitments in this area.

OUR COMMITMENT

While there are cultural, regulatory and legal differences across the countries, this document sets out the agreed principles we commit to. It goes without saying that our lotteries fully comply to all applicable national regulations, including sector specific self-regulation and best practice.

In addition, we are among the safest lottery operators in the market with many safeguards hardwired into our model and our values. This 7-point Code of Conduct applies to all Postcode Lotteries and guides all new lottery operations.

7-POINT CODE OF CONDUCT

- 1. Safe offer:** We operate lotteries to create a better world. Our lottery games are safe games. This means the time between purchasing a subscription and finding out if you have won, is not instant. Playing the lottery should be fun, and it should in no way lead or cause problem gambling behaviour.
- 2. Limit:** We will restrict the number of subscriptions a player can play with, ensuring that our players cannot spend excessive and unaffordable amounts playing on our lotteries. We will have regular contact with those that choose to play with the maximum subscriptions to ensure that we are satisfied that they are not at risk of problem gambling or have other vulnerabilities.
- 3. Payment:** In countries where payment by credit card is allowed (Sweden, Germany) we limit this option and encourage payment by Direct Debit. In Great Britain, the Netherlands and Norway we do not accept credit cards as a payment method.

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4. *Research:* We commit to knowing our players so that they make the right choice for their circumstances, to the extent permitted by the General Data Protection Regulation (GDPR). Within these boundaries we will try to ensure that our players have the mental capacity to understand the financial commitment and will identify individuals who should not be playing because of the presence of vulnerabilities which affect their decision making.
5. *Information:* Our lotteries provide clearly information for (potential) players about the characteristics, rules and costs of our lottery. Our websites contain all relevant information and our Customer Service departments are open every working day to answer questions. We will provide signposting for gambling support services through our Customer Experience team or online.
6. *Responsible marketing:* Players can easily opt-out of receiving marketing messages and we ensure that our marketing is straightforward not misleading in any way, and is not designed in such a way as to appeal to children, young people or infer that financial problems will be solved by winning a prize.
7. *Knowledge requirements:* Our teams understanding our commitment to responsible play, and those in relevant positions have the knowledge and insight required to ensure the appropriate procedures, standards and values are maintained to keep our players safe.

Signed:

Sigrid van Aken
CEO Novamedia
