

Code of Conduct for Responsible Play

BACKGROUND

The Postcode Lottery Group operates six lotteries across five countries with 14.8 million subscriptions. Our shared mission is to contribute to a better world by raising funds for good causes through operating charity lotteries in a socially responsible way. For over 35 years our players have raised 15 billion euros for civil society. Our fundraising model supports unrestricted and long-term charity 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 payment and outcome is long.

There are large differences between charity lotteries and gambling/betting companies. As a lottery operator we believe in many players, playing together with a low number of tickets to raise a high number of funds for civil society. We don't just differ in terms of problem gambling but also regarding our aim: charity fundraising versus profitmaking. The Postcode Lottery Group is a private company fully owned by the non-profit Novamedia Foundation, with a single goal: to set up lotteries that raise funds for charities. Despite the limited risk characteristics of lotteries, we are committed to ensuring our operations protect potentially vulnerable players and this code of conduct outlines our commitment in this area.

OUR COMMITMENT

While there are cultural, regulatory, and legal differences across the countries we operate in, this document sets out the agreed principles we commit to. It goes without saying that our lotteries fully comply with all applicable national and EU/EEA regulations, including sector-specific self-regulation and best practice; this includes European Lotteries Responsible Gaming standards¹ and the World Lottery Association Responsible Gaming Framework².



The seven principles in this Code of Conduct for Responsible Play are specifically designed for our lottery model and reflect our approach to responsible and enjoyable play.

1. Safe game design

We operate lotteries to create a positive impact on society. Our games are designed to be both enjoyable and safe, with multiple safeguards in place to ensure they stay that way.

¹ www.european-lotteries.org/responsible-gaming-standards

² www.world-lotteries.org/services/industry-standards/responsible-gaming-framework/framework

One of the reasons lottery games are considered low risk is their built-in structure, which avoids the instant gratification and rapid feedback loops typical of fast-paced digital gambling. Lotteries have a significant time interval between a player's payment (when the stake is deducted from their account) and the announcement of the draw results. Even after a win, there is a delay before prizes are actually paid out. This delayed process plays a crucial role in preventing impulsive behaviour and eliminating the possibility of chasing losses. It allows players to participate without being drawn into harmful patterns that can arise from more immediate forms of gambling.

Our approach has been recognised by experts. Professor Mark Griffiths, Distinguished Professor of Behavioural Addiction at Nottingham Trent University, has referred to charity lotteries as among the safest gambling products available, as detailed in the report *Postcode Lotteries: A Game Risk Assessment*³ (Postcode Lotteries, 2021). The low-risk nature of lotteries—combined with the fact that they generate benefits for both consumers and society more broadly—is further highlighted in *Beyond the Jackpot: Analysing the Safety of Charity Lotteries*⁴ (Regulus Partners, November 2024).

By design, our lotteries promote responsible play and contribute positively to both individual well-being and the greater good.

2. Financial safeguards for players

The number of subscriptions a player can have is restricted to a maximum to ensure that players cannot spend excessive amounts participating in our lotteries. This maximum amount of tickets varies from country to country depending on local context including ticket price.

On top of that, we regularly check upon our players who have a higher number of subscriptions within the maximum. Through direct contact, we create awareness around their participation and encourage informed, balanced play.

If a payment cannot be collected from a player's account, the player simply does not participate in the draw. When payments cannot be collected for an extended period of time, we reserve the right to end the subscription. Participation is always limited to successfully processed payments. We never use debt collectors, and players cannot accumulate any form of debt with us.

3. Responsible Marketing

Our marketing is clear, straightforward, and always designed with care. It is not intended to appeal to vulnerable groups, nor does it suggest that winning a prize could solve financial problems. We strictly adhere to relevant sector marketing codes and actively contribute to keeping these codes up to date and fit for purpose.

Players can easily opt out of receiving direct marketing messages at any time. We make this process simple and accessible, respecting our players' preferences and privacy.

³ [Postcode Lotteries: A Game Risk Assessment. Prof Mark Griffiths, Nottingham Trent University, March 2021.](#)

⁴ [Beyond the Jackpot: Analysing the Safety of Charity Lotteries. Regulus Partners, November 2024.](#)

4. Knowledge requirements

Our teams understand our commitment to responsible play, and our staff and customer experience colleagues have the knowledge and insight required to ensure that the appropriate procedures, standards, and values are maintained to keep our Lotteries enjoyable, responsible, and within appropriate limits.

5. Knowing our players

We operate a subscription-based model, which means we know who our players are—anonymous ticket purchases are not possible, and players cannot pay in cash or purchase multiple tickets from different retail outlets.

All transactions take place digitally, supporting a secure and transparent process. Each payment is directly linked to a personal bank account. We do not use online wallets, and players always use the same bank account for withdrawing the payment and receiving prize money. This closed-loop system helps protect both the integrity of our operations and the financial security of our players. As a result, our lotteries do not allow for money laundering in any form. Our processes around identification of players are also important in preventing under-age play.

6. Informing our players

We provide clear information for (potential) players about the characteristics, rules, and costs of our lotteries. Our websites contain all relevant details, and our Customer Service colleagues are available every working day to answer questions.

We ensure that players are informed about the rules of our lotteries, the prizes they can win, the odds of winning, and any applicable age restrictions. We also provide information about responsible play, how to unsubscribe from participation, and how to opt out of marketing communications.

In addition, we inform our players about the charities—locally, nationally, and internationally—that have received funding thanks to their participation. This way, players not only understand the game but also see the broader impact of their support.

7. Supporting our winners

For winners of our larger prizes, we provide professional guidance and assistance, ensuring they are well-informed and equipped to manage their finances responsibly. This ensures that they can make informed decisions and are able to enjoy the benefits of their win in a safe and responsible way.

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