

# Postcode Lottery Group



## Code of Conduct for Responsible Play

### BACKGROUND

Postcode Lottery Group operate lotteries across five countries with over 13 million players. The Postcode Lottery format and related lotteries are owned by Novamedia, a social enterprise which is 100% owned by the not-for-profit Novamedia Foundation.

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 more than 30 years our players have raised more than 12.5 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 subscription and outcome is long.

There are large differences between charity lotteries and gambling/betting companies, not just in terms of problem gambling but also regarding their aim: charity fundraising versus private profitmaking. Despite the limited risks, 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 Certification. <https://www.european-lotteries.org/responsible-gaming-standards>



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

### **POSTCODE LOTTERY GROUP CODE OF CONDUCT**

1. *Safe offer:* We operate lotteries to create a better world. Our lottery games are low risk and have been referred to as one of the safest products in the worldwide gambling market, by Professor Mark Griffiths. Distinguished Professor of Behavioural Addiction at Nottingham Trent University<sup>1</sup> This is partly because the time between purchasing a subscription and finding out if you have won,

---

<sup>1</sup> Novamedia Postcode Lotteries: A Game Risk Assessment. Prof Mark Griffiths, Nottingham Trent University, March 2021. <https://www.novamedia.com/news/lottery-news/Leading-Academic-Postcode-Lotteries-are-a-very-safe-game>

is not instant. Playing the lottery should be fun, and it should in no way lead to or cause problem gambling behaviour.

2. *Limit:* We will restrict the number of subscriptions a player can buy for a single campaign, ensuring that our players cannot spend excessive amounts playing our lotteries. We will have regular contact with those that choose to play with a higher number of subscriptions to ensure that there are no signals of problem gambling or other vulnerabilities.
3. *Payment:* We have no retail presence, which means that players cannot pay in cash, meaning that there is no risk of money laundering.
4. *Player knowledge:* We commit to knowing our players so that they make the right choice for their personal circumstances, to the extent permitted by the General Data Protection Regulation (GDPR). Within these boundaries we try to make sure that all our players fully understand their financial engagement and we identify individuals who should not be playing because of the presence of vulnerabilities which could affect their decision-making. The minimum age a player can be is 18 years old, including in jurisdictions where the legally allowed age is lower.
5. *Information:* Our lotteries provide clear information for (potential) players about their characteristics, rules, and costs. Our websites contain all relevant information, and our Customer Service departments are open every working day to answer questions. In addition, we inform our players about the charities, locally, nationally and internationally, that have received funding thanks to their involvement.
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 vulnerable groups of people or infer that financial problems will be solved by winning a prize. We also adhere to sector marketing codes.
7. *Knowledge requirements:* Our teams understand our commitments to responsible play, and our senior staff and customer experience agents have the knowledge and insight required to ensure that the appropriate procedures, standards, and values are maintained to keep our players safe.
8. *Support:* For winners of our larger prizes we provide 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.

Signed:



Sigrid van Aken  
CEO Novamedia

April 2023