

Social Responsibility Policy

Ellen MacArthur Foundation ('EMF', 'our', 'we') and our External Lottery Manager, Postcode Lottery Limited trading as People's Postcode Lottery ('PPL'), are committed to ensuring that our lottery is operated in a crime free, fair and open way as a socially responsible operator and to endorsing responsible gambling amongst its players. We expect PPL to have the appropriate processes in place to ensure that the objectives outlined in The Gambling Act 2005 (listed below) and referred to in this policy, stand up to scrutiny.

The Gambling Commission regulates gambling to ensure that:

- it is crime free;
- it is fair and open; and,
- children and vulnerable people are protected.

This policy sets out our and PPL's processes in place to ensure that any gambling activities are approached in a socially responsible way. This policy applies to all relevant employees of the Ellen MacArthur Foundation and Ellen MacArthur Foundation Trading Limited (collectively 'EMF', 'we').

1. Preventing gambling from being a source of crime and disorder

When a player joins our lottery, PPL will check that:

- The individual is aged 16 or over:
 - players must provide their date of birth and have a bank account or other age-verified payment method.
- The individual is a resident of Great Britain:
 - lottery tickets are dependent on the provision by a player of their valid GB postcode.

To prevent fraud and criminal activity, PPL will:

- Pay prizes only to paying playing accounts.
- Ensure draws are adjudicated by an independent legal representative and completed on a secure, standalone and certified draw engine.
- Offer no cash subscriptions.
- Report suspicious activities to the Gambling Commission and to the Police, under the Proceeds of Crime Act 2002.

2. Ensuring that gambling is conducted in a fair and open way

We and PPL ensure that:

- Players' funds are protected from insolvency, with lottery proceeds held separately from any other trading income and in approved accounts.
- Promotion of the lottery is in line with consumer law and follows the Committee on Advertising Practice and ClearCast guidelines.



- Players have access to clear information on the rules of the lottery and the prizes that are available, and providing notification of changes which are submitted to the Gambling Commission 28 days in advance.
- Tickets are provided clearly indicating when we are the promoting society, dates of the draw, price of the tickets and that the lottery is licensed and regulated by the Gambling Commission.
- A customer care process in place that creates an alert when a player subscribes to more than six tickets.
- A complaints process in place to deal with any issues in a clear and procedural way including an option for Alternative Dispute Resolution.

3. Protecting children and other vulnerable persons from the risks of gambling

- PPL work with regulated third parties that have a process for age-verification.
- PPL and EMF adhere to advertisement rules laid out by the Committee of Advertising Practice, and ensure that lottery advertising does not:
 - encourage gambling that may lead to socially irresponsible acts or could lead to financial, social or emotional harm;
 - exploit children or other vulnerable persons;
 - suggest gambling can solve financial problems or debts;
 - suggest gambling can increase attractiveness or sexual success;
 - link gambling to youth culture or attempt to attract young persons to gamble.

We will endeavour to address the following issues:

- Underage Gambling. It is illegal for individuals under the age of 16 to enter into a lottery. If upon winning any individual is unable to prove that they are 16 or over, any winnings will be forfeited.
- Gambling Limits. Gambling should be entertaining and not seen as a way of making money: avoid chasing losses and only gamble what you can afford to lose. PPL imposes limits on the number of tickets purchased by an individual in a single transaction to three. PPL will actively contact individuals who subscribe to more than six tickets to discuss their subscription level.
- Self-Exclusion. A self-exclusion policy and procedure is in place to protect vulnerable individuals.
- Access to Player History. It is important to keep track of the time and amount spent on gambling. PPL will provide any player with a full history of their lottery subscription, including payment and winnings history, upon request.
- Provide Information on gambling support. On the PPL website a click-through link to the BeGambleAware website is provided. In the event that a player feels their level of gambling is causing difficulties, the PPL Customer Experience team, who are specially trained to identify and assist vulnerable or at risk players, will actively refer them to these services.

4. General Points

- The Lottery is regulated by the Gambling Commission under licences XXX-X-XXXXXX-XXX and XXX-X-XXXXXX-XXX.
- PPL has an 'External Lottery Manager' (also known as an ELM) licence to promote lotteries on behalf of charities. The individual charities have operating licences and the individual charities are accountable for all the proceeds.
- All relevant staff are trained and made fully aware of this social responsibility policy.

5. Data Protection

PPL manage all details relating to players and their bank account(s) securely and in accordance with the requirements of the EU General Data Protection Regulation (GDPR). No player's details will be passed to third parties.

6. Legal requirements

EMF adheres to all relevant legal requirements to promote its lottery and PPL has significant experience in operating responsible processes within the legal framework required for the business.

REVIEW

This policy is reviewed annually.