

Decision no. 143/2/6-2-2015

Subject: Amend, complement and codify HGC decision no 115/2/11.07.2014 (B 2041) "Regulating the Operation and Control of Games of Chance Conducted via VLT Gaming Machines".

THE HELLENIC GAMING COMMISSION

Considering:

- a) The provisions of Articles 16 to 23 of Law 3229/2004 (GG 38/A) and Articles 25 to 54 of Law 4002/2011 (GG 180/A) as supplemented and amended by the provisions of paragraphs 10 to 26 of Article 7 of Law 4038/2012 (GG 14/A), the provisions of Articles 22 to 24 of Law 4141/2013 (GG 81/A), the provisions of Article 74 of Law 4170/2013 (GG 163/A), the provisions of Article 106 of Law 4209/2013 (GG 253/A), the provisions of Articles 34 and 35 of Law 4223/2013 (GG 287/A), the provisions of Article 22 of Law 4255/2014 (GG 89/A), the provisions of Article 173 of Law 4261/2014 (GG 107/A) and, in supplement, the provisions of Law 3051/2002 (GG 220/A) as in force;
- b) Decision No. 55906/1673/20-12-2011 (Special Officials and Management Positions of Public Sector and Wider Public Sector Bodies Bulletin of the Government Gazette No. 444) of the Minister of Finance which established the HGC as amended by Decision No. 07/590/13-09-2013 (Special Officials and Management Positions of Public Sector and Wider Public Sector Bodies Bulletin of the Government Gazette No. 451) and ΓΔΟΠ 0000031 ΕΞ 2014 (Special Officials and Management Positions of Public Sector and Wider Public Sector Bodies Bulletin of the Government Gazette No. 24) of the Minister of Finance according to which the composition of the HGC has been renewed;
- c) Joint Decision No. 56660/1679/22-12-2011 (GG 2910/B) of the Minister of Finance and the Minister of Culture and Tourism confirming commencement of the operations of the Hellenic Gaming Commission (HGC);
- d) HGC Decision no 133/2/3.12.2014 (B 3508) entitled "Regulation for the Organisation, Operation and Structure of HGC Units", as in force;
- e) Decision no. 010010/04.11.2011 (B 2503) of the Minister of Finance granting OPAP S.A. a license to operate the 35,000 VLTs under article 39 of Law 4002/2011 (A 180), as in force;
- f) Decision no. ΓΔΟΠ 0000192 ΕΞ 2014/24-02-2014 (GG 545/B) of the Minister of Finance about setting the fees and dues regarding the conduct of the games of chance via VLTs;
- g) HGC decision no 115/2/11.07.2014 (B 2041) "Regulating the Operation and Control of Games of Chance Conducted via VLT Gaming Machines";
- h) HGC decision no 115/2/11.07.2014 (B 2042) on the Technical Specifications for playing Games of Chance using VLT Gaming Machines, as in force;

i) Decision no. 115/4A/11-07-2014 (GG 2045/B) of the HGC about regulating issues of Certification of the Amusement Skill Games and Gaming Machines and of the Games of Chance and VLT Gaming Machines, and creation of the relevant Registries, as in force;

j) HGC decision no. 129/2/7.11.2014 (B 3162) entitled "Regulation for implementing measures for combating money-laundering and the financing of terrorism by persons in the games of chance services market";

k) Report dated 2.2.2015 of the HGC Chairman on the amendment and codification of HGC decision no 115/2/11.07.2014 (B 2041) "Regulating the Operation and Control of Games of Chance Conducted via VLT Gaming Machines";

l) The need to amend HGC decision no 115/2/11.07.2014 (B 2041), in order to include provisions specifying a daily loss threshold for every player, establishing a gaming time limit, setting a minimum distance between certified gaming premises, and between gaming premises and schools or boarding houses, with a view to protecting minors from exposure to games of chance and to prevent the development of any regularity (regularity principle) for participation in games of chance;

m) the need to qualify the penalties stipulated in Law 4002/2011 (A 180) as in force, and to develop a methodology for imposing penalties that will be uniformly and objectively applied in case of violation of the provisions in the decision regulating the operation and control of games of chance conducted via VLT gaming machines, in the framework of the principles of legality and sound management;

n) the procedure for issuing and using an Individual Player Card for participation in any game, that is used to identify players thus eliminating, as much as possible, on the one part the participation of minors, persons under 21 years, as well as the self-excluded players of instance (p) of article 25 of Law 4002/2011 (A 180) as in force, and on the other part, money laundering;

o) The fact that this Decision does not entail any burden on the State budget or the Commission's budget;

p) relevant information held by the HGC and the ensuing discussion, we hereby decide:

to amend, complement and codify HGC decision no 115/2/11.07.2014 (B 2041) "Regulating the Operation and Control of Games of Chance Conducted via VLT Gaming Machines", as follows:

CHAPTER I
GENERAL PROVISIONS

Article 1
DEFINITIONS

For the purposes of this Decision the following phrases or words shall have the meaning attached thereto:

License shall mean the license that has been granted to OPAP S.A. pursuant to decision no. 010010/04.11.2011 (B 2503) of the Minister of Finance, regarding the 35,000 Gaming Machines stipulated in article 39 of Law 4002/2011 (A 180), as in force.

Gaming only premises shall mean premises where Games of Chance through Gaming Machines may exclusively be played, in accordance with the provisions of the town planning legislation.

Payout shall mean the ratio of Total Credits Won to Total Credits Played in the same Game expressed as a percentage (%).

Individual Player Card shall mean the card stipulated in paragraph 4, article 33 of Law 4002/2011 (A 180), as in force.

Self-Excluded Player shall mean the player stipulated in item (p) of article 25 of Law 4002/2011 (A 180), as in force.

Player Database shall mean the database which stores all necessary data relating to the issuance of the Individual Player Card, the data relating to Playing Behaviour and all relevant financial transactions of the player.

Core memory shall mean the electronic device that is exclusively used for programming and storing the Game of Chance's software program.

Random Number Generator shall mean the number generator, consisting of software and/or hardware, installed either on the Gaming System Server or on any Gaming Machine and which generates random combinations in order to determine the outcome of each Game of Chance.

Communications Network shall mean all necessary hardware, software and network interfaces required for gaming machines to communicate online in real time with the CIS via the GSS.

Commercial Communication shall mean any form of communication for the direct or indirect promotion of products, services or the image of undertakings, organisations or any person providing said services according to the law.

Gaming System Server (GSS) shall mean all the necessary hardware and software which is used, maintained and checked by the Operator and Concessionaires and which is necessary for all central organisation, operation, conduct, monitoring, recording, checking and management of Games of Chance conducted through VLTs.

Online Player Account shall mean the unique account kept by the Operator and/or the Concessionaires for each player, enabling them to participate in one or more Games. This account records, among others, amounts played in and won from Games, all related financial transactions, as well as the Player's available balance.

Daily Loss Threshold is the amount of money that each Player sets as the maximum amount that they can lose in any given calendar day, defined as the difference resulting after subtracting credits won from cash-ins, within the same calendar day.

Regulation shall mean this decision regulating aspects of how Games of Chance played on VLT Gaming Machines are conducted and controlled.

Central Information System (CIS) shall mean all necessary hardware and software which is used, maintained and checked by the Operator and which is necessary for all central organisation, operation, playing, monitoring, recording, management and checking of Games of Chance played using Gaming Machines via the GSS.

Game Cycle shall mean the complete sequence of events that takes place on the screen of the Gaming Machine, from selecting the game start option by the Player to the final transfer of credits to the Player's respective credits counter or the loss of all credits wagered in this sequence.

Accounting System shall mean part of the CIS which collects and processes accounting data from the GSS, Gaming Machines and other systems related exclusively to this data, in order to manage and trace this data

Registry shall mean the entire set of data kept by the HGC for Games, Gaming Machines, Premises, as well as Manufacturers, Importers and Technicians.

Credit shall mean the accounting unit representing the minimum amount of money required for a player's participation in a Game of Chance.

Core Memory ID shall mean the code or name of the program/software of each Game, which:

- a. precisely identifies the unique content and function of the Game program / software;
- b. is printed on the Game's Core Memory, and
- c. is included in the certification of the Game by an independent Certification Body.

Certification Body shall mean an independent specialised certification laboratory or organisation, recognised by the HGC, which is accredited, according to the applicable European and/or international standards, by the Hellenic Accreditation System S.A. (E.SY.D. S.A.) or by accreditation bodies from other countries with which ESYD has entered into mutual recognition agreements. The accreditation must cover the scope of the Technical Specifications and Regulations.

Player shall mean any natural person holding an Individual Player Card.

Playing Behaviour shall mean all elements determining the way in which Players participate in Games, such as Premises they visits, Gaming Machines they prefer, Games they play, amounts played, time normally spent playing Games (days and hours). Playing Behaviour data shall be recorded into the Player Database and shall be available to the Player upon request, to the Operator and/or the Concessionaires, and shall be monitored by the Playing Behaviour Control System.

Gaming Session shall mean the period of time from the moment a Player inserts the Individual Player Card into the Gaming Machine until he/she removes it.

Concessionaire shall mean the person or entity to whom the Operator has granted, for a consideration, the right to install and operate a certain number of Gaming Machines, in accordance with the procedures and conditions laid down in the provisions of Articles 39 and 40 of Law 4002/2011 (Government Gazette 180/A) as in force.

Certified Premises or Premises shall mean an establishment, certified by the HGC, where Games are conducted using Video Lottery Terminal (VLT)-type Gaming Machines.

Certified Game or Game shall mean a game, certified by the HGC, conducted using Video Lottery Terminal (VLT)-type Gaming Machines.

Certified Gaming Machine or Gaming Machine shall mean the electronic Video Lottery Terminal (VLT)-type machine, used for the conduct of Games and certified by the HGC.

Certified Importer or Importer shall mean a person or entity, established in a Member State of the European Union or the European Economic Area, that sells, by any means, Games and/or Gaming Machines from third countries in the single market, and that has been certified by the HGC.

Certified Manufacturer or Manufacturer shall mean the person or entity that manufactures and markets Games and/or Gaming Machines, bearing their brand name or trademark, and certified by the HGC.

Certified Technician or Technician shall mean the person or entity professionally operating in the production and/or installation, repair, upgrading and/or maintenance of Games and/or Gaming Machines, certified by the HGC.

Certification shall mean the process whereby the HGC ascertains whether the conditions required in each case are met and the subsequent entry into a Registry, thus enabling the conduct, operation and control of Games played on Gaming Machines.

Supervision and Control IT System (SCITS) shall mean all hardware and software installed and operated by the HGC to provide continuous supervision and control of Games played on Gaming Machines. Until installation and operation of the SCITS by the HGC, the Operator is required to provide the Authority with remote access to the CIS.

Prepaid card shall mean a card with a specific pecuniary value stated on the card itself, and/or is credited with money units.

Affiliation Agreement shall mean the agreement concluded between the Player and the Operator and/or Concessionaire.

Checksum shall mean the number that equals to the sum of orders given by a software program in a one memory. Two programs with identical content have the same Checksum number. Checking the Checksum number of a of memory seeks to confirm that this memory has not altered.

Affiliated Companies shall mean the companies stipulated in item (m) of article 25 of Law 4002/2011 (A 180), as in force.

Credits won shall mean all credits that Players have won in a specific game.

Credits played shall mean all credits that Players have played on a specific game.

Individual Player Card Management System shall mean the system that issues, monitors and manages Individual Player Cards.

Gaming Management System shall mean that part of the GSS enabling management and control of the good operation of the Game and Jackpot software. It contains the Certified Game Storage System and manages all functions related to distributing Games to each Gaming Machine.

Player Management System shall mean all software and hardware which is installed by the Operator and each Concessionaire to manage the Player Database.

Communication Control System shall mean that part of the CIS which can manage the communication functions with the Gaming Machines and the GSS.

Responsible Gambling Control System shall mean that part of the CIS that, inter alia, imposes the restrictions included in the rules for Responsible Gambling during a Gaming Session, and monitors all active Gaming Sessions on Gaming Machines and records their activities in the Player Database.

Control System shall mean that part of the CIS which contains a set of electronic systems which have been designed to control, in real time, and store in the operating system's memory the data shared by the GSS and the CIS.

Data Backup and Recovery System shall mean that part of the GSS and CIS which ensures disaster recovery, storage and data recovery, restoration of system functions and the creation of backup of all GSS and CIS data.

Technical Specifications shall mean the technical specifications laid down by the HGC for the software, hardware, networks, systems and other equipment for playing Games of Chance using VLT-style Gaming Machines.

Game of Chance shall mean any game so designated in the applicable provisions.

Responsible Gambling shall mean all the HGC provisions and directives aimed at minimising the negative effects from Player participation in Games of Chance.

Premises Manager shall mean the natural person who is jointly and severally liable with the Operator and/or Concessionaire to comply with the provisions of Law 4002/2011 (180/A) and the Regulation, as defined in Article 45.

Operator shall mean the legal entity holding the License to Operate Games of Chance on Gaming Machines, which, according to the provisions of article 39 of Law 4002/2011 (A 180) and decision no. 010010/04.11.2011 (B 2503) of the Minister of Finance, is OPAP S.A.

Subcontracting shall mean any contract which has been concluded by the Operator or Concessionaire and a subcontractor.

Subcontractor shall mean the person with whom the Operator or Concessionaire has concluded a partnership agreement to supply, install, upgrade, maintain or support IT systems and communication networks, used for or otherwise related to the conduct and operation of Games of Chance using Gaming Machines.

Jackpot shall mean the pecuniary prize of a fixed or progressively rising value paid out to the Players, and which is accumulated over time by credits contributed by the Operator or the Concessionaire and/or by withholding credits from one or more Games in one and/or more

Gaming Machines, in one and/or more Premises participating in the Jackpot, according to the terms approved each time by the HGC and the Minister of Finance.

System/Mystery Activated Jackpot shall mean the Jackpot paid out by the Gaming Management System to the Player who will make the Jackpot progressive counter reach or surpass the mystery value, between the minimum and maximum Jackpot thresholds, which has been set using a certified Random Number Generator.

Article 2

GENERAL PRINCIPLES

- 2.1 The Regulation shall apply to Games conducted solely and exclusively on VLT-type Gaming Machines.
- 2.2 The Operator or the Concessionaires shall not be permitted to, in any way, make any association and/or correlation of Playing Behaviour data with the personal data of Players for reasons of Commercial Communication, except for implementing any loyalty programs, in accordance with the Rules of Commercial Communication set by the HGC.
- 2.3 In accordance with the provisions of Article 34 of Law 4002/2001 (A 180), as in force, only the Player, the HGC, as well as the purpose-appointed and trained staff of the Operator and/or the Concessionaires, which must be notified to the HGC, shall have access to Playing Behaviour data.
- 2.4 The Operator shall not be permitted to, in any way, make any association and/or correlation of the Players' personal data with their Playing Behaviour, except for the purposes of compliance with the applicable legal and regulatory framework and for control purposes such as, in particular, blocking the access of minors and persons under 21, identifying Players to real natural persons, providing data to a Player upon his/her request, cross referencing of tax liabilities arising from winnings and issuing winnings certificates in accordance with Article 14. The Operator notifies to the HGC all necessary measures it intends to take to ensure implementation of this provision.
- 2.5 The Operator and Concessionaires shall ensure that the organisation and conduct of the Games is performed in a reliable and secure manner, complies with rules of public order, the principles of public interest, the Technical Specifications, and all other provisions in force, and does not endanger public health and safety or jeopardise transparency of transactions.
- 2.6 Certification of Premises shall relate to the suitability of the Gaming premises, pursuant to the requirements of this Regulation. Operators, Concessionaires and Premises Managers shall be responsible to ensure that the Premises operate in a lawful, safe manner.
- 2.7 Each Certified Gaming Machine, system and/or piece of equipment used by the Operator and Concessionaires to conduct, supervise and control the operation of Games, shall be installed in the premises and the location specified in its Certification, if required. Any of the following may be specified in the Certification as an installation site: a Certified Premises or an apartment in a building or a building. Any relocation from those premises, for whatever reason, shall be made following approval by the HGC, and according to the procedure it lays down. Any relocation conducted without such authorisation, shall cause the immediate revocation of the Certification for the Gaming Machine, system and/or equipment so relocated. Such items may be moved within the areas and Premises specified in the Certification, after HGC has been informed. Any Certified Gaming Machine withdrawn from use according to the provisions of paragraph 35.6 of this Regulation and placed in one of the

states stipulated in said paragraph, shall be marked and inspected by the HGC. Possession, use or sale of a Certified Gaming Machine which has been withdrawn from use, without it being placed in any of the states of paragraph 35.6 of this Regulation, is prohibited.

2.8 The HGC, under the principle of mutual recognition may grant the Certifications provided for in the Regulation, to machines, equipment, software applications or systems (hereinafter "Products") manufactured and/or lawfully sold in another Member State or in Turkey, or lawfully manufactured in an EFTA (European Free Trade Association) Member State, which is a contracting party to the European Economic Area Agreement, provided they offer a degree of protection equivalent to that specified in the Technical Specifications and the Regulation. In the above case, the HGC shall exercise the right of prior observation before the release of these products in the Greek market. For the implementation of said observation, the Certification applicant must present to the HGC all required information and documents, in particular certificates of conformity with other technical specifications and copies of said technical standards, officially translated into Greek, documenting the equivalent degree of protection. The process of verifying the equivalent degree of protection can be done by Certification Bodies at the expense of the certification applicants.

If the product to be Certified has already been certified by an independent specialised laboratory or certification body that has no accreditation in the field of the Technical Specifications and the Regulation, then the Product to be Certified shall be treated in accordance with the provisions of paragraph 2.7.

2.10 The documents specified in this Regulation shall be sent initially in hard copy. Alternatively, for the licensing and certification procedures laid down in this Regulation, the HGC may adopt an electronic handling system.

2.11 The fees and charges specified in this Regulation shall be set by Decision of the legally competent body.

2.12 In case of a ban placed on the Business or if the Certification of Games, Gaming Machines, Premises, Manufacturers, Importers or Technicians is lifted, and in case of discontinuation of Business operation for any reason whatsoever, fees and charges already paid, according to the provisions in force and this Regulation, are non-refundable.

2.13 At its discretion, the HGC may cross-check the accuracy of the information submitted in the context of this Regulation in total or at random.

Article 3

PROTECTION OF PLAYERS, MINORS AND OTHER VULNERABLE GROUPS

3.1 Minors, persons aged 18 to 21 years old and Self-Excluded Players are prohibited from accessing the premises where Games of Chance are played on Gaming Machines.

3.2 The Operator, Concessionaires and the Premises Managers shall be obliged to prohibit persons referred to in paragraph 3.1 from entering or staying in such premises, and shall also be obliged to display a sign both inside and outside of the Premises prohibiting entrance to such persons.

3.3 The Operator and Concessionaires shall be obliged to:

- 3.3.1 Comply with the obligations deriving from the provisions of paragraphs 6.3 and 6.4, and in Article 41 of this Regulation.
- 3.3.2 Have in each Certified Premises:
 - a. A Game Guide for each Certified Game of Chance in accordance with the provisions of Article 16 of this Regulation;
 - b. Info-sheets about Responsible Gambling, such as the help lines and/or other support services, the self-exclusion procedure, etc.
- 3.4 The Operator shall be obliged to operate a helpline on matters relating to the responsible conduct of Certified Games of Chance and support for players and in particular for persons vulnerable to those Games.
- 3.5 The HGC may issue a decision imposing restrictive and corrective measures on the Operator and Concessionaires in order to protect minors.

Article 4

COMMERCIAL COMMUNICATION

- 4.1 The Operator and Concessionaires must comply with the provisions of the Gaming Regulation and the decisions of the HGC, regulating the issues of Commercial Communication of Games of Chance.
- 4.2 It is prohibited to, in any way, use the contact details that have been provided to issue Individual Player Cards, for Commercial Communication purposes without the Players' explicit consent.
- 4.3 The HGC may impose the immediate cessation of any Commercial Communication action which is contrary to the applicable provisions and this Regulation.

Article 5

INDIVIDUAL PLAYER CARD

- 5.1 To participate in Games played on Gaming Machine an Individual Player Card must be obtained.
- 5.2 The Individual Player Card is issued by the Operator, upon request, in all Certified Premises of the Operator and Concessionaires and at other locations authorised by the Operator, which have appropriately trained staff and infrastructure for communicating with the CIS.
- 5.3 The issuance of an Individual Player Card to persons aged under 21 and to Self-Excluded Players is not allowed. Each Player may only have one Individual Player Card.
- 5.4 The details of Self-Excluded Players and Players to whom additional restrictions have been imposed upon their request or by Decision of the HGC, shall be entered in the CIS and shall be available to the HGC via the SCITS.
- 5.5 The Individual Player Card must:
 - 5.5.1 Be directly or indirectly readable by the CIS when inserted into any Gaming Machine.

- 5.5.2 Only have the absolutely necessary data stored on it to allow it to be read directly or indirectly by the CIS, which will be used to identify the Player. The data structure in the Individual Player Card memory must be disclosed by the Operator to the HGC.
- 5.5.3 It must be protected by a Personal Identification Number (PIN), and the Player must be requested to enter it before starting to play.
- 5.5.4 Clearly state the player helpline and Responsible Gambling support line on the front of the card.
- 5.5.5 Have the technical characteristics specified in the Technical Specifications.
- 5.6 The Individual Player Card Management System which will be adopted by the Operator must have a valid certificate of conformity with this Regulation and Technical Specifications, issued by a Certification Body recognised by the HGC. In case the Certification Body issuing the certificate of conformity is accredited in the field of Technical Specifications in other countries, the Individual Player Card Management System shall be treated in accordance with the provisions of paragraphs 2.8 and 2.9.
- 5.7 Adults aged over 21 and non-Self-Excluded Players can apply for an Individual Player Card by submitting the required supporting documents to any Certified Premises.
- 5.8 The terms for issuing, managing and using an Individual Player Card, as described in the Regulation, form part of the Affiliation Agreement and include at least the following:
 - 5.8.1 The conditions for issuing an Individual Player Card.
 - 5.8.2 The procedure for issuing and cancelling an Individual Player Card.
 - 5.8.3 The procedure for notifying changes in personal details.
 - 5.8.4 The way an Individual Player Card is used and any restrictions of use.
 - 5.8.5 The replacement procedure in the case of loss, theft or malfunction of an Individual Player Card.
 - 5.8.6 The conditions for the Operator unilaterally deactivating the Individual Player Card.
 - 5.8.7 The use of personal data and protection of personal data in accordance with the provisions in force.
 - 5.8.8 The customer helpline and Responsible Gambling support line.
- 5.9 Individual Player Cards are issued upon signing of the Affiliation Agreement, as described below:
 - 5.9.1 The applicant fills-in the relevant application, which is then signed by the applicant and the issuing agent, who shall confirm the accuracy of the information on the application and of the supporting documents accompanying the application. The application stands in terms of legal effect as an official statement addressed to the Operator and the HGC.
 - 5.9.2 The issuing agent will then enter the applicant's details into the Player Database which is connected with the SCITS.
 - 5.9.3 The Individual Player Card application form shall include at least the following personal information about the applicant:
 - a. Full name & father's name

- b. Date of birth
 - c. Identity card or passport number
 - d. Full details of the permanent place of residence.
 - e. Shipping address of the Individual Player Card.
 - f. Any restrictions selected by the Player among the options supported by the CIS.
- 5.9.4 The Individual Player Card shall be accompanied by a copy of the applicant's identity card or passport.
- 5.9.5 The Individual Player Card shall be issued provided it is found that all conditions in paragraph 5.3 are met.
- 5.9.6 The rejection of the Individual Player Card's application should be justified and made in writing. Any objections from the player regarding the rejection of the application shall be submitted in writing to the Operator. Player objections and the steps taken by the Operator to address them, shall be notified by the Operator to the HGC within five (5) working days.
- 5.9.7 The Individual Player Card shall be sent by registered mail to the Player's permanent place of residence or the address provided in the application form.
- 5.9.8 The Individual Player Card may be issued and delivered in person to the Player immediately upon submission of the application, if the specific authorised outlet has the appropriate equipment.
- 5.10 The Individual Player Card application form and the supporting documents accompanying it, shall be held by the Operator in electronic format for at least ten (10) years.
- 5.11 Upon request by the Player, the Individual Player Card must be cancelled at once.
- 5.12 The Operator shall ensure that lifting of the status of a Self-Excluded Player can only occur after the lapse six (6) months from the date the self-exclusion was imposed. A Player may set restrictions as to the Gaming time and spending, on a daily, weekly and monthly basis. The Operator shall ensure that the individual restrictions set by the Player shall only apply for the time period originally set.
- 5.13 The HGC may prohibit the issuing of an Individual Player Card or order that it be revoked, when the applicant or Player:
- a) has been convicted for a felony or given any sentence for theft, embezzlement, fraud, breach of trust, fencing, extortion, forgery, active or passive bribery, dangerous or gross bodily injury, concealment of a felony, currency related crime, dangerous crime, crime against personal freedom, crime against sexual freedom, crime of financial exploitation of sexual life, as well as for any crime stipulated in the law on narcotics, guns, explosives and tax evasion,
 - b) has been given any sentence for a crime foreseen under the applicable legislative and regulatory framework regarding games.
- 5.14 The Operator shall be obliged to immediately cancel the Individual Player Card when the Player reports it to have been stolen, lost or destroyed or following a decision from the HGC.

CHAPTER II
OPERATOR AND CONCESSIONAIRES

Article 6

OBLIGATIONS OF THE OPERATOR

- 6.1 The Operator shall be obliged to comply with the Laws and Regulations on the conduct and operation of Games played on Gaming Machines, the terms of its the License, the provisions of this Regulation, the Technical Specifications and all related instructions and codes of conduct issued by the HGC throughout the term of the License.
- 6.2 The Operator shall be subject to the obligations which derive from the License also for that part of the Business which has been assigned to the Concessionaires, and to this end, shall secure adequate guarantees from them.
- 6.3 In particular, the Operator shall be obliged to:
- 6.3.1 Take all necessary measures so as not to allow access to Certified Premises to persons who are under twenty one (21) years old and to Self-Excluded Players.
 - 6.3.2 Discourage the uncontrolled playing of Games to ensure implementation of the principles of Responsible Gambling and compliance with the restrictions in Article 41 of these Regulations.
 - 6.3.3 Operate Certified Gaming Machines only, on which Certified Games are played, installed and operated exclusively in Certified Premises.
 - 6.3.4 Take all appropriate measures to prevent wagers between Players and/or third parties based on predicting the result of Games played.
 - 6.3.5 Ensure that Certified Gaming Machines and Games are not changed, interfered with, re-programmed or modified in any other way in relation to any element or feature thereof, compared to those taken into account during the Gaming Machine or Game Certification process.
 - 6.3.6 Ensure that no person, other than Certified Technicians, has access to Certified Gaming Machine control panels or the software of Certified Games.
 - 6.3.7 In case the Operator finds:
 - a. any unauthorised intervention to the settings of a Gaming Machine or Game,
 - b. any malfunctioning of any Gaming Machine, not allowing the normal conduct of Games, according to this Regulation,
 - c. any wear giving rise to reasonable concerns about the safe operation of a Gaming Machine,the Operator shall stop using the affected Gaming Machine and immediately notify the HGC of said events, any measures taken to address them and the results thereof.
 - 6.3.8 Immediately notify the HGC and deactivate the affected Gaming Machine, if they discover that the sticker of article 15 has been removed, damaged, tampered with or destroyed. In order for the HGC to issue a new sticker, the Operator will need to submit a justified re-issue request.

- 6.3.9 Take all measures necessary, so that the staff involved in the conduct of the Games is suitably briefed on the applicable legal provisions, the Regulation, as well as all measures and procedures of the Operator qualifying the above, and ensure participation in specialised training programs on this subject.
- 6.3.10 Ensure that authorised officers of the HGC are given full and uninterrupted online and/or physical access to the Central Information System, the Game System Servers, the Communication Networks and the Gaming Machines, Games and Premises of both the Operator and the Concessionaires.
- 6.4 The Operator shall be obliged to train the Premises Managers and employees so that they are able to:
 - 6.4.1 Inform Players on responsible gaming or gambling, and provide information on getting help on gaming addiction.
 - 6.4.2 Prevent any person appearing or being under the influence of alcohol or other addictive substances or showing signs of sleepiness or clearly being in a state in which responsible gaming cannot be ensured, from participating in Games and/or entering the Premises.
 - 6.4.3 Discreetly and sensitively manage inappropriate Player conduct.
 - 6.4.4 Inform Players and all persons concerned about the ability to exclude themselves or set restrictions to their participation in Games.
 - 6.4.5 Assist Players and/or persons authorised by them, in order to deal with cases of addiction to Games.
 - 6.4.6 Keep records of incidents at the Premises, recording all incidents that need to be dealt with on the spot, as well as the manner in which they were dealt with and its' results.
- 6.5 The Operator shall be obliged to comply with the legislation in force each time on the protection of Player personal data and is prohibited from disclosing that data to any third person in any manner. To that end, the Operator shall brief and obtain an appropriate commitment from all persons who have access to such data and shall take all appropriate preventative measures so that it is not possible to identify players using technical or other means which can reasonably be used by third parties.
- 6.6 The Operator shall include the obligation of Concessionaires, OPAP S.A. agents, subcontractors and employees to comply with the obligations deriving from the relevant legislation, the License, the Regulation and the HGC decisions, as a contractual term.
- 6.7 In case of violation of the law regulating the gaming market by the Concessionaires, OPAP S.A. agents, subcontractors and employees, and especially the regulations aimed at combating fraud and crime, protecting minors, protecting consumers, preventing addiction to gambling, the Operator shall promptly inform the HGC.
- 6.8 Managers and Directors of the Operator must not:
 - a) have been convicted for a felony or given any sentence for theft, embezzlement, fraud, breach of trust, fencing, extortion, forgery, active or passive bribery, dangerous or gross bodily injury, concealment of a felony, currency related crime, dangerous crime, crime against

personal freedom, crime against sexual freedom, crime of financial exploitation of sexual life, as well as for any crime stipulated in the law on narcotics, guns, explosives and tax evasion,

b) have been given any sentence for a crime foreseen under the applicable legislative and regulatory framework regarding games.

Article 7

CHARACTERISTICS AND OBLIGATIONS OF CONCESSIONAIRES

- 7.1 The Operator shall grant Concessionaires the right to operate Gaming Machines in return for a consideration; the number of Gaming Machines and the procedure for such concession being regulated in the provisions in force from time to time. Concessionaires are prohibited from further conceding the above right to operate, with or without consideration.
- 7.2 Copies of the relevant contracts shall be filed with the HGC within fifteen (15) days from the date of execution.
- 7.3 Concessionaires are prohibited from being Affiliated Companies.
- 7.4 Managers and Directors of the Concessionaires must not:
 - a) have been convicted for a felony or given any sentence for theft, embezzlement, fraud, breach of trust, fencing, extortion, forgery, active or passive bribery, dangerous or gross bodily injury, concealment of a felony, currency related crime, dangerous crime, crime against personal freedom, crime against sexual freedom, crime of financial exploitation of sexual life, as well as for any crime stipulated in the law on narcotics, guns, explosives and tax evasion;
 - b) have been given any sentence for a crime foreseen under the applicable legislative and regulatory framework regarding games.
- 7.5 Concessionaires install Gaming Machines in Type B and Type E Certified Premises, as specified in Chapter X of the Regulations, and shall be entitled to select which Gaming Machines to use and which Games to offer, from a list of HGC approved Games and Gaming Machines that the Operator will provide them with, the technical requirements of which must in any case ensure that they are constantly monitored electronically by the Operator, the HGC and the Ministry of Finance.
- 7.6 Concessionaires shall be obliged to comply with all the provisions relevant to the conduct and operation of Games of Chance played on Gaming Machines, the terms of the concession agreement, the provisions of this Regulation, the Technical Specifications, as well as any relevant HGC instruction and decision, throughout the term of the Concession.
- 7.7 The obligations in paragraphs 6.1, 6.3, 6.4, 6.5, 6.6 and 6.7 of the previous article shall also apply to Concessionaires.

Article 8

SUBCONTRACTORS

- 8.1 The Operator and Concessionaires shall be obliged to supervise the activities of each Subcontractor and shall remain fully and absolutely liable for the acts and omissions thereof,

in relation to the conduct of Games.

- 8.2 The Operator and Concessionaires shall keep a record of the Subcontracting agreements which shall include a table containing the Subcontractor's details, a description of the scope of the Subcontracting agreement, and the entry into effect and expiry, and shall make them available to the HGC in the manner and at the time the HGC shall set.

CHAPTER III

CONDUCT OF GAMES OF CHANCE USING GAMING MACHINES

Article 9

PLAYER TERMS OF PARTICIPATION

- 9.1 A Player shall only be allowed to participate in the games if he/she has accepted, in writing, the Affiliation Agreement, and if the Individual Player Card has been issued. In any case, the Affiliation Agreement must also be available to the Player on the Gaming Machine, if this function is technically supported.
- 9.2 The Affiliation Agreement is concluded only once and contains, as a minimum, the terms and conditions for participating in the games, the terms for issuing, managing and using an Individual Player Card, the rules of conduct in the Premises, the way winnings are paid out, and the terms, conditions, and deadlines for submitting complaints or reports by Players. This deadline may not exceed the required time for keeping records, information and data, necessary to investigate the complaint or report.
- 9.3 The Player shall be required to accept the terms of any amendments to the Affiliation Agreement, either in writing or electronically, through the Gaming Machine.
- 9.4 The Affiliation Agreement, as well as any amendment thereof, shall be submitted to the HGC for approval.
- 9.5 The Affiliation Agreement acceptance data shall be held by the Operator and/or Concessionaires for a period of at least ten (10) years.

Article 10

PAYOUT

- 10.1 The Operator and Concessionaires shall be obliged to ensure that the Games Payout is applied, in accordance with their Certification and the Regulation's provisions.
- 10.2 The Operator and Concessionaires shall ensure that the Payout selected each time through the settings of a Game or a Game theme, shall be applied on all Certified Gaming Machines offering said Game or Game theme in the same Premises.

Article 11

PROCEDURE AND LIMITS OF PARTICIPATION

- 11.1 In order to participate in Games of Chance, Players must necessarily insert their Individual Player Card into Gaming Machine in order for it to be checked and read.
- 11.2 Players may participate in their Game of choice using the following means:
- 11.2.1 Cash.
 - 11.2.2 Vouchers.
 - 11.2.3 Prepaid Cards.
 - 11.2.4 By reinvesting credits.
- 11.3 It is prohibited to extend any type of credit to Players and/or discount on the cost of participation, including any kind of gifts or other incentives, which seek to attract Players to play Games and/or to increase their wager. This prohibition does not include the provision of free plays as part of the winnings, and/or discounts or other incentives in the framework of loyalty programmes.
- 11.4 In order to participate in a Game, Players need to set their daily loss threshold at the start of the first Gaming Session.
- 11.5 A Player's Daily Loss threshold shall be effective from 00:00:01 until 00:00:00 of the same day. Once the Threshold is reached, the Player is excluded until 00:00:00 of the same day. A Threshold set cannot be increased within the same calendar day by the player; it can only be reduced. Reduction of the Daily Loss Threshold takes effect immediately.
- 11.6 Irrespective of the Daily Loss Threshold of paragraph 11.4, the Operator shall be obliged to immediately stop a Gaming Session when a Player has recorded a loss of eighty (80) euros.
- 11.7 Upon Players reaching 80% of the threshold of paragraphs 11.4, 11.6 and 5.12, the Operator shall so inform them through a message appearing on the main display for an adequate amount of time so that Players perceive it as an interference to their Game and thus adequately understanding its contents. In this message, Players shall be warned that: a) they have exceeded the above percentage; b) as soon as the threshold set is reached, the Gaming Session will be discontinued and c) they can reduce the daily loss threshold in the Gaming Machine's options menu.
- 11.8 Players may not participate in Games for more than twelve (12) hours a week (Sunday to Saturday). Meanwhile, Players' total maximum participation in Games time shall not exceed forty (40) hours per calendar month (from the first to the last day of the month). As soon as one of the above time limits is reached, the Operator and Concessionaires shall exclude Players from participating in Games. Any remaining playing time shall not carry over to the next period (week or month).
- 11.9 Players shall be able to either exclude themselves or introduce restrictions to their Playing Behaviour in one of the following ways:
- 11.9.1 By calling the Operator's customer helpline, following the appropriate identity authentication procedure.

11.9.2 By filling out the relevant form in the Certified Premises, following the appropriate identity authentication procedure.

11.9.3 By visiting the "Personal user interface" on the Gaming Machine, when such function is available.

11.10 The Operator and Concessionaires shall be obliged to promptly register the details of Self-Excluded Players and Players who have introduced restrictions on their Playing Behaviour, in the Players Database along with information describing the Self-Exclusion or restrictions.

11.11 The Operator and Concessionaires shall be obliged to provide each Player with an Online Player Account which contains the date, time, Gaming Machine and amount wagered on each Gaming Session, the winnings and the current Player balance.

Article 12

PREPAID CARD

12.1 Players may participate in Games played on Gaming Machines also using Prepaid Cards.

12.2 The Operator and Concessionaires shall specify the types of acceptable Prepaid Cards which Players can use to participate in Games played on the Gaming Machines they operate.

Article 13

PLAYER WINNINGS

13.1 Any winnings resulting from playing any Game Cycle, shall be added as credits to the available Player balance immediately after the Game Cycle is over. The credits required at the start of each Game Cycle, shall be deducted from the available Player balance at the start of each Game Cycle.

13.2 Upon completion of each Gaming Session, any winnings are immediately paid out to Players, either by crediting their Online Player Account or through a cash-out ticket issued by the Gaming Machine which can then be redeemed, after the corresponding tax has been withheld. The precise procedure for paying winnings to Players shall be laid down by the Operator and/or Concessionaires in the Affiliation Agreement.

13.3 The available balance in the Online Player Account must be cashable at any time. It is prohibited to block any amount for future participation in a Game Cycle, and not pay out the winnings when they are lower than a specific threshold.

Article 14

WINNINGS CERTIFICATE

A winnings certificate shall be issued pursuant to the provisions of HGC decision no. 129/2/7.11.2014 (B 3162).

CHAPTER IV
PLAYER INFORMATION AND PROTECTION

Article 15

PARTICIPATION IN GAMES OF CHANCE

- 15.1 Participating in a Game is the result of free and independent personal choice and comes unsolicited and unstimulated (unstimulated gambling). Players may obtain information on the rules of the Game, the likelihood of achieving winnings in each Game, and information on who they can contact for help with addiction. The relevant information must be made available by the Operator and Concessionaires in the Certified Premises, on their internet websites any by any other appropriate means.
- 15.2 Operator and Concessionaires shall provide Players with information on:
- 15.2.1 Their participation in Games, in a way that will enable them to make decisions based on a full knowledge of the rules of each Game they choose to play.
- 15.2.2 The risks that overexposure to games of chance entails, such as loss of capital and addiction. In this context, each Gaming Machine must display Responsible Gambling messages. These messages shall be displayed in such a way and for such time, that they are perceived as interference to their playing the Game and are adequately understood by Players.
- 15.2.3 The existing structures that provide help and support to addicted Players and their families.
- 15.3 The Operator, Concessionaires, their staff, management, as well as anyone operating Gaming Machines for the conduct of Games, including their staff, shall be prohibited from participating in the Games that they conduct or that they are involved in.
- 15.4 Players are prohibited from participating in Games via interposed persons.

Article 16

GAME GUIDE

- 16.1 A Game Guide shall be issued by the Operator or Concessionaire for each Game, available in both hard copy and electronic format.
- 16.2 Each Game Guide must necessarily include:
- 16.2.1 The trade name of the Game.
- 16.2.2 All issues relating to Player participation, especially the minimum age of persons allowed to play Games on Gaming Machines.
- 16.2.3 The ways in which the Game can be played, the payout, symbols, numbers or other designations used.
- 16.2.4 Information on the winnings paid, such as the maximum payout, the combinations of symbols, numbers or other designations which, if achieved, will enable the Player to obtain specific winnings or free rounds in the Game.
- 16.2.5 Information on the taxation applicable to winnings.

- 16.2.6 The name and address of the Operator or Concessionaire offering the Game and their website.
- 16.2.7 The phone number (toll-free) providing information and support services and receiving complaints.
- 16.2.8 Information about the fact that the Operator, Concessionaires and Games played using Gaming Machines are certified, supervised and controlled by the HGC and the Authority's contact details.
- 16.2.9 Information about the fact that the Regulation is posted on the websites of the Operator and Concessionaires, and on the HGC website.
- 16.3 The Game Guides shall be available at a conspicuous location in the Certified Premises and shall be accessible using all appropriate means and methods.
- 16.4 Where some information or data about the Games offered is not included in the Game Guides or if they contain errors, the Operator and/or Concessionaires shall be obliged to communicate the correct and full information to the public with every available means, until a new Guide is issued within a reasonable period of time.

Article 17

INFORMATION AND INSTRUCTIONS APPEARING ON GAMING MACHINE SCREENS AND ON IN-STORE MONITORS

- 17.1 All information appearing on the screen of Gaming Machines must be presented in letters of a suitable size and remain for such time that the Player can easily read it. The information that must be available to the player at any time on the screen of the Gaming Machine is the following:
 - 17.1.1 The trade name of the Game the Player is playing.
 - 17.1.2 The amount the Player selects, each time, to play in the Game.
 - 17.1.3 The result of the last Game Cycle the moment it ended (e.g. cards in hand, combinations of symbols, images, etc.), until the next Game Cycle starts or the Player leaves the Game or requests a cash-out or payout.
 - 17.1.4 Amount of winnings from the last Game Cycle until start of the next Game Cycle, or until the Player leaves the Game or requests a cash-out or payout.
 - 17.1.5 Player's choices during the last Game Cycle, until start of the next Game Cycle or until the amount played changes.
 - 17.1.6 Available Player balance.
- 17.2 In Premises conducting Jackpots, or participating in Multi-Venue Jackpots, there needs to be an adequate number of special screens, either stand-alone or integrated in Gaming Machines, providing information to Players. Throughout the Jackpot, such info-screens shall be connected to the GSS and present the following minimum information:
 - 17.2.1 The current date and time.
 - 17.2.2 The name of the Jackpot.

17.2.3 The size of the Jackpot which must be updated within thirty (30) seconds from being calculated by the GSS.

17.2.4 The fact that the Jackpot has been won, when that happens, in a manner perceptible to the Players. The following minimum information must appear for each Jackpot payout:

- a. The exact amount being paid out.
- b. The code number of the Gaming Machine which won the Jackpot.
- c. The name and code number of the Premises where the Jackpot was won.
- d. The date and time when it was won.

17.3 The fact that the jackpot was won shall be accompanied by a distinct sound and the information about the jackpot being won shall appear on the screen for a period of no less than thirty (30) seconds.

17.4 If the jackpot is interrupted for technical or other reasons, the screen must display the appropriate message (e.g. "Jackpot temporarily unavailable") until it becomes available again.

Article 18

PLAYER INFORMATION AND RELIABILITY

18.1 The Operator and Concessionaires shall ensure that all information, in any format, provided to consumers and Players is true, accurate and understandable, and does not contain or is not associated in any manner with information which could be considered misleading.

Article 19

SPECIAL PROVISIONS FOR THE DISABLED

The Operator and Concessionaires shall be obliged to comply with the applicable provisions ensuring accessibility of the Premises by people with motor disabilities.

Article 20

PROTECTING THE IDENTITY OF WINNERS

The Operator and Concessionaires shall ensure that they, the Managers of Certified Premises, and all persons with an employment contract or a contract for work or retainer arrangement at those premises, do not disclose the identity of the persons they know have participated in Games, or who have made any winnings or have lost any amount from playing such games, without the prior written consent from the specific persons. Such consent shall not be required when that information is provided to the HGC or elsewhere, in line with the applicable provisions.

Article 21

COMPLAINTS FROM THE PUBLIC

The Operator and the Concessionaires shall be obliged to implement an effective and adequate system for handling complaints from consumers and Players and must keep a record of those complaints.

CHAPTER V

REPORTING REQUIREMENTS AND RECORD KEEPING

Article 22

REPORTING REQUIREMENTS

22.1 The Operator and Concessionaires provide the following to the HGC, in the manner, time and format specified by the Authority:

22.1.1 A report at the end of each calendar quarter on the management and operation of the Games, which shall include the following information in qualitative and quantitative form:

- a. The forms of Commercial Communication used and the expenditure incurred.
- b. Data relating to complaints, objections, requests or questions from the public and the steps and time taken to address them.
- c. Information relating to outages, malfunctions or faults in the IT systems, Gaming Machines, structures or procedures and steps and time taken to address them.
- d. Any studies, research or reports relating to the Gambling Market, Player preferences and consumers behaviour, the conduct of Games on Gaming Machines and how they operate.

22.1.2 Access to their facilities, the facilities of Certified Premises and all systems associated with the conduct, supervision and control of Games on Gaming Machines, at any time by authorised HGC agents, thereby ensuring that all the requested information will be provided.

Article 23

RECORD KEEPING

23.1 The Operator and Concessionaires shall be obliged to keep electronic records for all functions and transactions relating to the conduct, operation and management of Games. The records shall be retained for a minimum period of ten (10) years in a medium that allows the storage of information in a format and manner meeting the following conditions:

23.1.1 All corrections or other modifications, as well as the contents of the records prior to such corrections or modifications, must be easily discernible;

- 23.1.2 The HGC must have direct and easy access to the records, via the SCITS and/or in the manner and at the time specified by the Authority.
- 23.2 Certain records may be held in hardcopy following a reasoned request to that effect submitted by the Operator or Concessionaire and approved by the HGC. The criteria of paragraphs 23.1.1 and 23.1.2 shall apply to record keeping.
- 23.3 The time at which the records shall begin to be kept, as specified in the provisions of this Regulation, is the day after the information to be filed is generated.

CHAPTER VI

GAMES HARDWARE AND SOFTWARE

Article 24

CENTRAL INFORMATION SYSTEM

- 24.1 The Operator shall install a Central Information System (CIS) which will be used to organise, operate, run, monitor, control and manage Games of Chance played on Gaming Machines at a central level.
- 24.2 The CIS must be network-connected to the SCITS so that the HGC has the option to:
- 24.2.1 Access all information programs, stored files and data, and in general all system functionalities.
 - 24.2.2 Obtain any data from each GSS for all aspects of the organisation, playing and operation of Gaming Machines, for all Games and for all Premises (e.g. financial, commercial, statistical, safety data, etc.) broken down or consolidated, as the case may be.
 - 24.2.3 Ascertain the flawless operation of all components and modules, at any time.
- 24.3 The Operator shall be exclusively responsible for ensuring permanent SCITS access to the CIS.
- 24.4 The Central Information System (CIS) shall operate and fully respond to the requirements for uniform management of all data and shall, directly and efficiently, cover the need to exchange all necessary information between the CIS and the GSS. Operation of the CIS shall be monitored using appropriate tools so as to directly identify any changes in the normal operation of the CIS, malfunctions and emergencies.
- 24.5 The CIS shall include as a minimum:
- 24.5.1 A Control System;
 - 24.5.2 An Accounting System;
 - 24.5.3 A Communication Control System, and
 - 24.5.4 A Data Backup and Recovery System.
- 24.6 The CIS shall perform the following functions as a minimum:
- 24.6.1 Financial monitoring of each Premises, each Gaming Machine and each form of Game. This data shall be monitored both at Game and Gaming Machine level and at Player

level, thus enabling implementation of the Responsible Gambling rules monitoring and controlling any Player-imposed restrictions or Player self-exclusions.

- 24.6.2 Collect and provide all data needed in each case by the HGC, with the required degree of breakdown, processing and presentation, for all Games, Gaming Machines and Premises.
- 24.6.3 Monitor and control all Gaming Machines and all other equipment required to run and operate them which are installed on Certified Premises.
- 24.6.4 Monitor and control the operation of the Communications Network via protocols providing reliable and secure communications with the Gaming Machines.
- 24.6.5 Software and hardware diagnosis and troubleshooting.
- 24.6.6 Continuously monitor proper operation of GSS components.
- 24.6.7 Implement exclusion procedures in cases where there may be malfunctions or attempts to tamper with any of the components of the Gaming Management System.
- 24.6.8 Real time updates in cases of malfunction, infringement or attempts to tamper with any of the components in the Games Management System so as to ensure that exclusion procedures are implemented.
- 24.6.9 Apply automated procedures verifying the integrity of software installed on each module, including the Game software installed on each Gaming Machine.
- 24.6.10 Ensure search functions, providing information on the following, in real-time or in reasonable time not exceeding the Gaming Session:
 - a. The extent to which each component of the system is connected to the CIS.
 - b. The precise time at which the last integrity check was performed on the components of the Gaming Management System.
 - c. The system operating check and updates about the need to carry out preventative or corrective maintenance on all components of the CIS.
 - d. The Games available per Premises and per Gaming Machine.
 - e. The taxes and relevant fees payable to the State by the Operator and Concessionaires, on a daily, weekly, monthly and annual basis, per Premises, Gaming Machine and Game, and overall. The search functions for withholding taxes payable against Player winnings, shall be applied after every Gaming Session.
- 24.6.11 Check that only one Individual Player Card is issued per player and ensure that the player does not participate in any Game without using the Card.
- 24.6.12 The ability to implement and manage multiple interconnections of Jackpots (whether progressive or system Jackpots) on Gaming Machines and Games in one or more Certified Premises.
- 24.6.13 The ability to terminate and reboot all components of the GSS and to activate and deactivate one or more Games on the CIS or the Gaming Machines.
- 24.7 The CIS must have logical and physical security that fully ensures:
 - 24.7.1 Access control to various programs in the software, stored elements, records, data and all functionalities in general.

- 24.7.2 High functional availability.
- 24.7.3 The integrity, reliability, accuracy and fidelity of stored data in the records, and all data derived from the SCITS.
- 24.8 The CIS must manage information relating to:
 - 24.8.1 The Gaming Session, in detail and in aggregate, as well as any resulting winnings.
 - 24.8.2 The amounts collected, taxes and relevant fees payable to the state on profits of the Operator or Concessionaire, and the winnings paid out on a daily, weekly, monthly and annual basis from each Gaming Machine (showing subtotals per game), from each Premises, from each active Game of Chance, and from the CIS in total. Information regarding taxes withheld on Player winnings shall be managed per Gaming Session.
 - 24.8.3 Connections and disconnections for each GSS component.
 - 24.8.4 Access attempts (authorised and unauthorised) and the data of all persons who accessed each one of the components of the GSS.
 - 24.8.5 Faults and preventative and corrective maintenance work on each of the components of the GSS.
 - 24.8.6 Work carried out on the software for each component of the GSS.
- 24.9 All the above information shall be held for a period of at least ten (10) years in processable format.
- 24.10 Any scheduled or unscheduled upgrade to the CIS equipment and software, is notified to the HGC and accompanied by a timeframe, as well as a detailed reference to the CIS components being upgraded, and the expected benefits or functions stemming from the upgrade.
- 24.11 The Backup and Recovery Data Systems must be physically located at a site different from that of the CIS.
- 24.12 The CIS must have a valid certificate of conformity with the Technical Specifications and the Regulation, issued by a Certification Body. In case the certificate of conformity has been issued in accordance with the technical specifications of other countries, or the Certification Body issuing the certificate of conformity is accredited in the field of technical standards of other countries, the CIS shall be treated according to the provisions of paragraphs 2.8 and 2.9.

Article 25

GAMING SYSTEM SERVER

- 25.1 In order to play Games on a Gaming Machine it is essential for the Operator and Concessionaires to install one or more Gaming System Server(s) (GSS). Each GSS shall include as a minimum:
 - 25.1.1 Gaming Machines.
 - 25.1.2 A Communications Network enabling real-time communication of the Gaming Machines with the CIS via GSS.
 - 25.1.3 Gaming Management System
 - 25.1.4 Data Backup and Recovery System.

25.1.5 Player Management System

- 25.2 Each GSS installed must ensure at least the following basic functions and operational capabilities:
- 25.2.1 Real-time communication between all components of the system (Gaming Management System, Player Management System, Communications Network, Gaming Machines, etc.) and high availability of their functions. All components of the GSS must be synchronised from one source, using universal time to synchronise (UTC).
 - 25.2.2 Proper operation of Certified Games.
 - 25.2.3 Real-time monitoring of the security and integrity of all components of the GSS and indicating any security breach (e.g. unauthorised opening of the Gaming Machine secure door or coin slot, tampering with counters, etc.) at the level of the Gaming Machine, Communications Network, etc.
 - 25.2.4 Control of access to various programs in the software, the stored data, the records and all functionalities in general.
 - 25.2.5 The integrity, credibility, accuracy and fidelity of the data stored in the files.
 - 25.2.6 The integrity, credibility, accuracy and fidelity of all data exchanged (data sent and received) with the CIS.
 - 25.2.7 The ability to apply and manage multiple jackpot interconnections for all or some of the Gaming Machines and Games in the same or in several Premises.
 - 25.2.8 The ability to identify the Gaming Machines and their software and the Games installed on them using seed and signature techniques.
- 25.3 Where the GSS supports validation of special cash-out tickets printed out by the Gaming Machines used for redeeming credits, the requirements of the Technical Specifications must be met. Moreover, the special cash-out ticket validation system must:
- 25.3.1 Have an algorithm generating authentication numbers or verification hashes for the redeemable cash-out tickets.
 - 25.3.2 Store all relevant information about the cash-out tickets in a database (authentication number, date and time of issue, cash value, status of ticket, date and time of expiry, Certified Gaming Machine ID from which it was generated, etc.) which is obtained from the system based on the secure communication protocol used.
 - 25.3.3 Ensure proper cash-out ticket redemption, depending on the secure communication protocol used.
- 25.4 For each GSS installed by the Operator or Concessionaires, the HGC shall be notified about the exact time-frame and the technical specifications. These technical specifications shall provide the HGC with a full picture of the modus operandi of all components of the GSS at the level of software, hardware and other equipment, techniques which ensure the connection to the Gaming Machines, the manner in which uninterrupted, secure operation of the GSS is ensured and the method of accessing it. Any changes to the exact time-frame and the technical specifications for installing the GSS is promptly notified to the HGC.
- 25.5 All GSS parameters which determine how Games are played and operated on Gaming Machines, the relevant payout per Game, how the Gaming Machine security and access policy is implemented and the overall function of the GSS, shall be sent to the HGC in order to verify

observance of the law and this Regulation. Any changes to the GSS parameters is promptly notified to the HGC.

- 25.6 Each GSS must operate fully in line with the requirements on uniform management of all data, and must directly and effectively meet the need to exchange all necessary information between the GSS, Premises and the Gaming Machines. The HGC must be able at any time to ascertain the flawless operation of all components of the GSS overall. Operation of each GSS shall be monitored via special displays and reports that are suitably designed so as to directly identify any changes in the normal operation of the GSS, malfunctions and emergencies.
- 25.7 Any scheduled or unscheduled upgrade to the CIS equipment and software, must be notified to the HGC and accompanied by a time-frame, as well as a detailed reference to the CIS components being upgraded, and the expected benefits or functions stemming from the upgrade.
- 25.8 The Backup and Recovery Data Systems must be physically located at a site different from that of the GSS.
- 25.9 The GSS must have a valid certificate of conformity with the Technical Specifications and the Regulation, issued by a Certification Body recognised by the HGC. In case the certificate of conformity has been issued in accordance with the technical specifications of other countries or the Certification Body issuing the certificate of conformity is accredited in the field of technical standards of other countries, the GSS shall be treated according to the provisions of paragraphs 2.8 and 2.9.

Article 26

COMMUNICATIONS NETWORK

- 26.1 The Communications Network shall connect the CIS with all Gaming Machines in one Premises, via the GSS. Each Communications Network provides full security to ensure:
 - 26.1.1 Reliable, accurate and faithful transmission of all necessary data between the GSS and the Gaming Machines to ensure problem-free operation of Games.
 - 26.1.2 High functional availability of the overall system.
 - 26.1.3 Protection of the confidentiality of data transmitted.
 - 26.1.4 The authenticity of the sender and receiver. No communication must be possible between a GSS and the Gaming Machines of any non-related and unauthorised computer.
- 26.2 In general to ensure the problem-free, dependable, reliable and secure playing of Games on Gaming Machines it will be necessary to:
 - 26.2.1 Ensure the accurate and faithful transmission of all kinds of data via the Communications Network (e.g. financial, commercial security data, etc.) and that such data is not corrupted or tampered with.
 - 26.2.2 All components and necessary equipment in the Communications Network must comply with the highest security standards in line with the international practice applied to Games and Gaming Machines.
 - 26.2.3 Ensure a constant connection including use of the Backup and Data Recovery System.

26.2.4 The computer network in the Gaming Management System must have technical characteristics compatible with current broadband technology and must permit communication between existing interfaces via Virtual Private Networks (VPNs).

26.2.5 The communication protocols for communication between all components of the system must guarantee the confidentiality of dialogues using encrypting algorithms with exception to the parts placed in the same data centre (i.e. servers placed on the same or adjacent support base or on the same or adjacent rack).

26.3 The Communications Network must have a valid certificate of conformity with the Technical Specifications and the Regulation, by a Certification Body. In case the certificate of conformity has been issued in accordance with the technical specifications of other countries or the Certification Body issuing the certificate of conformity is accredited in the field of technical standards of other countries, the Communications Network shall be treated according to the provisions of paragraphs 2.8 and 2.9.

Article 27

RANDOM NUMBER GENERATOR

27.1 Games are designed not to create false expectations for increased chances of winning or give, in any way, a distorted picture of events or incidents. The likelihood of each event occurring (e.g. cards dealt from a deck) must be the same as the likelihood of that event in a real-life situation.

27.2 The values generated by the Random Number Generator (RNG) shown in a particular format (e.g. deck of cards, ball, etc.) must, without fail, be used in accordance with the rules of the Game.

27.3 The RNG has a valid certificate of conformity with the Technical Specifications and the Regulation, issued by a Certification Body. In case the certificate of conformity has been issued in accordance with the technical specifications of other countries or the Certification Body issuing the certificate of conformity is accredited in the field of technical standards of other countries, the Random Number Generator shall be treated according to the provisions of paragraphs 2.8 and 2.9.

CHAPTER VII

JACKPOT

Article 28

JACKPOT FUNCTION

28.1 The various types of Jackpot are:

28.1.1 Depending on the way in which they are implemented, there are Game-Activated Jackpots and System/Mystery-Activated Jackpots.

28.1.2 Depending on the venue where they are played, there are Venue Jackpots and Multi-

Venue Jackpots.

- 28.1.3 Depending on the way the amount available is accumulated, there are Fixed Jackpots or Progressive Jackpots.
- 28.2 Venue Jackpots can be played following approval from the HGC, while Multi-Venue Jackpots may be played only upon decision of the Minister for Finance, on relevant recommendation by the HGC.
- 28.3 Game-Activated Jackpots are paid out, through the Gaming Management System, to the Player who will be the first to win the top prize in the payouts table for the specific Game, in one of the Games participating in the Jackpot. In that case, the Player wins both the Game's top prize, and the Jackpot amount.
- 28.4 The Gaming Management System shall be updated in real time by the Gaming Machine on which the top prize was won, and then shall pay out the Jackpot amount and update all other Jackpot info-screens in all participating Premises. Where the top prize is won on more than one Gaming Machines and consequently one or more Gaming Machines also win the Jackpot, before the Gaming Management System has completed processing the data and before the Jackpot is paid out to one Gaming Machine, that amount shall be equally split between all winning Gaming Machines. The time required to manage the payout of the amount and update the screens must not exceed thirty (30) seconds. The Games participating in this Jackpot category must have the same mathematical profile and the same likelihood of winning the top prize which leads to the Jackpot payout.
- 28.5 Venue Jackpots shall be played according the rules and procedures which are set out in the relevant terms, and shall be paid out to Players under the terms and conditions laid down in the approval decision. Where communication between the Premises where the Jackpot is being played is cut off from the GSS, the Jackpot may be allowed to continue to be played for a limited time period, as specified in the approval decision.
- 28.6 The maximum Venue Jackpot may not exceed the sum of one hundred thousand euros (€ 100,000).
- 28.7 It is not permitted to play Jackpots not controlled by the Operator's CIS and not connected to the GSS of the Operator or Concessionaire.
- 28.8 The criteria for allocating sums intended for each Jackpot shall be laid down by the Gaming Management System and shall be included in the theoretically calculated payout for the Game. A limit can be set to the participation percentage of the amount intended for each Jackpot by way of an HGC decision.

Article 29

TERMS AND CONDITIONS FOR RUNNING A JACKPOT

- 29.1 In order for any Jackpot to operate, it must meet the Technical Specifications, as well as the conditions in this article, as appropriate.
- 29.2 The following characteristics shall be confirmed in detail for each Game played on a Gaming Machine and participating in a Jackpot:
- 29.2.1 Multi-level Jackpot number;
- 29.2.2 Details on the design of the Jackpot depending on the way in which it is played;

- 29.2.3 Rules detailing how a win is made in each Jackpot;
 - 29.2.4 Starting amount for each subsequent Jackpot;
 - 29.2.5 Maximum Jackpot amount;
 - 29.2.6 Percentage of participation in the progressive increase in the Jackpot amount;
 - 29.2.7 Method for managing amounts collected after the maximum Jackpot amount is reached, so as to form Jackpot pools;
 - 29.2.8 Expected levels of activation/promotion values;
 - 29.2.9 Secondary percentages siphoned off into Jackpot pools;
 - 29.2.10 Clearing methods;
- 29.3 Venue Jackpots and Multi-Venue Jackpots must comply with the following terms:
- 29.3.1 The Jackpot amount can either be fixed or progressively increase depending on the amounts played and offered on more than one Gaming Machine in the same or in several Premises. The simultaneous use of multi-level payout Jackpots is permitted.
 - 29.3.2 Each Gaming Machine participating in the Jackpot must be uniquely identified by the Operator and Concessionaires. This information is directly accessible during any inspection by the HGC.
 - 29.3.3 The progressive Jackpot counter must show the total amount within thirty (30) seconds from the moment the amount is updated on the CIS or GSS. Where there is a specified refresh rate for the progressive total counter, it must show the overall amount once it receives the update from the CIS or GSS.
 - 29.3.4 The method whereby the values of the Jackpot parameters are generated or modified must be secure. The Jackpot is checked and monitored by the CIS, but it can also be checked by any appropriate system connected to the CIS and certified to this end, which among other things must:
 - a. Control all communication;
 - b. Calculate the values of the progressive payout;
 - c. Show the winnings values suitably along with the relevant progressive totals counter.
 - 29.3.5 Each of the Premises participating in a Jackpot must have the special info-screen referred to in paragraph 17.2 of this Regulation.
 - 29.3.6 In case of a progressive Jackpot, the Jackpot amount (value) formed each time, shall be kept in reserve so as to always be available for pay out to Players.
 - 29.3.7 Upon request of the Operator or the Concessionaire and relevant HGC approval, a progressive Jackpot may be cancelled. In that case, any additional amount, in excess of the starting amount, shall be transferred and added to the next one or any other running progressive Jackpot.
 - 29.3.8 Upon request of the Operator or the Concessionaire and relevant HGC approval, the progressive Jackpot amount (value) formed each time may be reduced. In this case, the cash value by which the total Jackpot amount (value) is reduced, shall be added to a future or another running progressive Jackpot.

29.3.9 Any part of the Jackpot value that is not paid out to Players because the maximum Jackpot amount has been exceeded according to the provisions of paragraph 28.6, shall be transferred and added to the next Jackpot or another running progressive Jackpot, according to the provisions of paragraphs 29.3.7 and 29.3.8.

Article 30

APPROVAL FOR RUNNING A JACKPOT

- 30.1 The Operator and Concessionaires shall submit a Jackpot approval request to the HGC accompanied by all data and information of articles 28 and 29 herein.
- 30.2 Approval for a Venue Jackpot shall be given by the HGC within thirty (30) days at the latest from submission of the relevant request. Where that deadline lapses, approval shall be presumed to have been given.
- 30.3 The recommendation on issuing the Minister of Finance decision approving a Multi-Venue Jackpot referred to in paragraph 28.2, shall be submitted by the HGC within thirty (30) days at the latest from the date on which the request is submitted.
- 30.4 The HGC may, at any time, prohibit or revoke a Jackpot for which no approval has been given or which is found to be being played in a manner contrary to the terms and conditions of approval, the relevant provisions or this Regulation.

CHAPTER VIII

GAMES CERTIFICATION

Article 31

GAMES CERTIFICATION

- 31.1 Each Game played on a Certified Gaming Machine must be certified by the HGC.
- 31.2 Certification shall be granted upon application of the Certified Manufacturer or Importer or Operator or Concessionaire.
- 31.3 The HGC shall keep a register of Games, posted on its website.

Article 32

CONDITIONS FOR CERTIFYING GAMES

- 32.1 In order for a Game to receive HGC certification, the following terms must be fulfilled cumulatively.
 - 32.1.1 The Manufacturer and/or Importer of the Game must be certified by the HGC and be entered in the relevant registry, in accordance with the provisions of Articles 47 and 48 of the Regulation.

- 32.1.2 The Game must be a software application installed on electronic support media, and must comply with the Technical Specifications and the Regulation.
- 32.1.3 The method for calculating winnings shall be independent of the log of the Gaming Machine where the Game is being played and shall be based exclusively on data from the Random Number Generator in conjunction with the Player's strategy, where the Game requires or permits the use of strategy as having an effect on the outcome of the Game.
- 32.1.4 The results of random events in the Game shall not be affected, controlled by or related to any other event, apart from the numerical values generated by a certified Random Number Generator, in relation to the currently applicable table of payouts and the applicable rules of the Game.
- 32.1.5 The Games software shall be designed so that, averaged over a statistically significant number of participations, it shall pay out, at the very least, the theoretically calculated payout specified in the certification application submitted to the HGC. The payout shall not be less than 80% for each Game. This parameter shall be checked once 5,000,000 Game Cycles are completed and following that, every 5,000,000 Game Cycles based on the results of the control system of the CIS or SCITS.
- 32.1.6 The minimum and maximum amount for participation in Games played on Gaming Machines, as applicable, shall be adjusted by HGC decision. The amounts that the Player can pay to participate in the Game must appear on the screen of each Gaming Machine.
- 32.1.7 It shall not be possible to start a new Game Cycle before the lapse of at least three (3) seconds from the start of the previous Cycle.
- 32.1.8 The maximum winnings of the Game shall not exceed € 1,000 per Game Cycle, including the value of all the Game's additional prizes allowed, excluding any Jackpot pay out, according to the provisions of this Regulation.
- 32.1.9 The symbols, or any other images used in the Game must not offend morality, national and religious symbols.
- 32.1.10 The Game must have a setting so that before each first Game Cycle, the HGC Game certification number appears on the screen for such time and at such frequency that the Player can be easily informed. The Game certification number can appear on the Game selection screen or on any screen of the Gaming Machine.
- 32.2 The Game rules, the relevant Player instructions, and the payouts table shall be presented to the Player on the Game screen and/or the help screen, according to the following:
- 32.2.1 The Game rules, Gaming Machine user guide, as well as all relevant information, shall be necessarily also in the Greek language. The above rules and instructions must be clear and easily comprehensible to Players, must not mislead Players, and must enable them to check the accuracy of the payout.
- 32.2.2 The payouts table for each Game must be presented either in conjunction with the amount paid to participate in the Game or must explain, in an easy and comprehensible way, how winnings are calculated in relation to each amount paid to participate. All amounts must be presented in euro and cents (in the format X€ or €X, 0.xx€ or €0.xx). The maximum winnings must be clearly stated.

- 32.2.3 The help text must expressly indicate the calculation method where winnings are the result of multiplying the total amount paid to participate.
- 32.2.4 The format in which dates and numbers are shown shall be in accordance with the practice followed in Greece (day, month and year).

Article 33

PROCEDURE FOR CERTIFYING GAMES

- 33.1 Certification of Games shall be provided following an application submitted to the HGC. The application shall include:
- 33.1.1 The particulars of the applicant.
- 33.1.2 The unique commercial name of the game to be certified (name and version number).
- 33.2 The application shall be accompanied by:
- 33.2.1 Proof of payment of the requisite charge.
- 33.2.2 An official declaration signed by the person submitting the application or their legal representative, with certified signature authenticity, stating that all information included in the application form and in accompanying documents is true.
- 33.2.3 A copy of the certificate of conformity with the Technical Specifications and this Regulation which has been issued by a Certification Body. In case the certificate of conformity has been issued in accordance with the technical specifications of other countries or the Certification Body issuing the certificate of conformity is accredited in the field of technical standards of other countries, the Game to be certified shall be treated according to the provisions of paragraphs 2.8 and 2.9.
- 33.2.4 Two (2) original copies of the Game on a suitable digital medium. Suitable digital medium shall mean any medium which easily allows for the Game to be checked for conformity with the Regulation. The Games' original copies shall be in such a form that will not allow their being re-recorded or any way interfered with or modified.
- 33.2.5 Two (2) original copies of the Core Memory, containing in its programming its unique ID, the Game software and, depending on the technology used, the checksum of each Game's software and/or the fragmentation algorithms (MD5, SHA-1 etc.) used for the encryption, authentication and verification of the software.
- 33.2.6 The data requested in paragraphs 33.2.4 and 33.2.5 bear a written confirmation from the Certification Body showing that they are identical to those included in the certificate of conformity and/or that they were taken into account in order for the certificate to be issued.
- 33.3 HGC issues the Game Certification which shall be valid upon payment of the lump-sum Certification fee of paragraph 34.1.2.
- 33.4 In case of submission of a certification application for a game that is made up of more than one games (multi-game), this game shall be certified as a whole, while the lump-sum certification fee of subparagraph 34.1.2 shall be paid for each one of the constituent games.
- 33.5 A new version of the Certified Game or additions and modifications to the existing Game shall be considered as new games which must be certified in accordance with the procedures laid

down in this Regulation. The same obligation also applies to games forming constituent parts of multi-game type games that have already been certified as a whole, and which may be marketed as standalone Games.

Article 34

GAME CERTIFICATION FEES AND CHARGES

- 34.1 The following amounts shall be paid for Game Certification:
- 34.1.1 An application charge;
 - 34.1.2 A lump-sum Game certification fee.
- 34.2 The procedure for payment of the prescribed charges and fees is described in paragraph 56.2 of this Regulation.

CHAPTER IX

CERTIFICATION OF GAMING MACHINES

Article 35

CERTIFICATION OF GAMING MACHINES

- 35.1 Every Gaming Machine installed in a Certified Premises must be Certified by the HGC.
- 35.2 Certification shall be granted upon application of the Manufacturer, Importer, Operator or Concessionaire.
- 35.3 The HGC shall issue the lawful operation sticker of Article 37 for each Gaming Machine.
- 35.4 Only Certified Games may be installed in each Gaming Machine.
- 35.5 A Gaming Machine which is in operation, may only be disconnected for the purpose of being transported to another Premises, only upon prior notification of the HGC.
- 35.6 Gaming Machines shall be placed in one of the following states, only following prior agreement of the HGC, which will provide the relevant state sticker within ten (10) days from the relevant request:
- a) Repair state, when an operational Gaming Machine is moved to a repair area;
 - b) Storage state, when an operational Gaming Machine is moved to a storage area;
 - c) Decommissioning for dismantling state, when a Gaming Machine is moved to a dismantling area;
 - d) Decommissioning for exportation state, when the process is put in place to export the Gaming Machine from Greece.
- 35.7 In order to reinstate a Gaming Machine to the previous state or to place it in another state, as above, and to finalise the procedure of paragraphs 35.5 and 35.6, the Operator or authorised Concessionaire, shall inform the HGC or submit a relevant request, depending the case.

35.8 The HGC may issue a decision regulating and qualifying every detail necessary regarding application of the provisions of paragraphs 35.5 and 35.6, and also introduce an approval and/or renewal process of the Certification terms.

35.9 The Operator or Concessionaire, as the case may be, shall maintain a Gaming Machine in the state it has been placed in pursuant to the provisions of paragraphs 35.5, 35.6 and 35.7 of the Regulation.

35.10 A log shall be kept for each Certified Gaming Machine, recording all access to the Gaming Machine. The notion of access in the previous passage, shall not include access via the Communications Network. The Technician who accessed to the Gaming Machine, will use the log to record access-related information, i.e. day, time, reason, results of access, as well as a statement that said access did not cause any changes affecting the Gaming Machine's CE mark or its certificate of conformity with the Technical Specifications.

Article 36

CONDITIONS FOR CERTIFYING GAMING MACHINES

36.1 Gaming Machines must meet all the following conditions in order to receive Certification from the HGC:

36.2 In order for gaming machines to be certified, they shall need to meet all the following conditions:

36.2.1 The Manufacturer and/or Importer must be Certified by the HGC, in accordance with the provisions of Articles 47 and 48 of the Regulation.

36.2.2 Gaming machines must be manufactured and must operate according to the Technical Specifications and the Regulation.

36.2.3 Gaming machines shall bear a CE mark or equivalent if they have been manufactured or marketed in a country of the European Free Trade Area (EFTA), which is a contracting party to the European Economic Area (EEA) Agreement, or Turkey, for the products of which the mutual recognition clause applies, under the conditions laid down in the European Commission's interpretative communication (2003/C 265/02).

36.2.4 Gaming machines shall have all the necessary equipment enabling real time interconnection and communication with the GSS, through a reliable and safe communication protocol.

36.2.5 They must not expose Players to any physical risk.

36.2.6 They must have a high-strength and security, robust, waterproof outer metal casing. The casing must have secure compartments which are used to hold the most critical components of each gaming machine, such as the electronic logic boards, etc. These inner secure compartments must only be accessible by specially authorised staff.

36.2.7 Must bear a label at a conspicuous location on the outer casing, featuring the following information, as a minimum: the Manufacturer, type, model, and unique serial number.

36.2.8 A Player shall not be able to play any Game on any gaming machine without first

inserting the Individual Player Card.

- 36.2.9 Gaming machines must have one or more of the following credit insertion mechanisms.
- a. A high-security coil slot and/or bank note slot, able to identify and reject any non-acceptable and/or forged coins or bank notes. Coin boxes and/or bank note cartridges must be high-strength and secure.
 - b. Prepaid Card. The system will read data on the prepaid card and on the Individual Player Card and also perform a parallel, independent verification of said data.
 - c. Pre-printed barcode vouchers containing Credits, checked by the GSS.
 - d. Credits charged to the Online Player Account.
- 36.2.10 Gaming machines must have a built-in printer for printing tickets in Greek with the option of printing barcodes, unless Players are offered an alternative payout method, such as a non-cash accounting system, which does not require a printer.
- 36.2.11 Gaming machines enable the conduct and management of multiple jackpot interconnections for all or some Gaming Machines and Games at one or more Premises where those jackpots are being played.
- 36.2.12 Other than the port for connection to the Communications Network, gaming machines must not have any manual or electronic, wired or wireless medium, and absolutely no internal or external component or device, which could enable any interference to the smooth playing of Games, or to the gaming software, the results probabilities, the level and percentage of winnings, the electronic Random Number Generator, etc. or any alteration, corruption or deletion of data stored on the Gaming Machine.
- 36.2.13 Gaming machines must have a special secure door which, once opened, causes immediate interruption of the machine's normal operation and alerts the staff of the Premises. Furthermore, there will also be a feature electronically recording every incident in a log and also ensuring that the gaming machine can only be test-run during such interruption of normal operation.
- 36.2.14 Gaming machines shall have the necessary equipment fully ensuring:
- a. The smooth, reliable, dependable, secure and uninterrupted playing of all Games.
 - b. The randomness and non-predictability of winnings.
 - c. Compliance with the winnings percentages specified in the relevant provisions and in this Regulation, and/or the relevant HGC approvals.
 - d. High functional availability of the gaming machine and of Games.
 - e. Integrity of gaming machine and Games software, stored data and all functionalities.
 - f. Monitoring, control and management by the GSS.
- 36.2.15 They have a functional and secure software, suitable for various forms of Games.
- 36.2.16 They feature suitable equipment for secure measurement, recording and storage of various types of data relating to the forms of Games played (e.g. financial data, security data, etc.) and must also transmit that data directly or indirectly to the CIS,

GSS and SCITS.

36.2.17 They perform, run diagnostics and identify faults, problems and malfunctions.

Article 37

GAMING MACHINE LAWFUL OPERATION STICKER

- 37.1 Every Gaming Machine bears a lawful operation sticker, indicating, as a minimum, the HGC logo, the Gaming Machine Certification code and the unique serial number from the Manufacturer. The form and type of the sticker, as well as any additional indicated information shall be specified by HGC decision.
- 37.2 The above sticker shall be provided by the HGC, shall be produced and incorporated and/or placed on Gaming Machines so that it is visible and readable by Players, and easily accessible by a person authorised by the Authority, at the risk and expense of the Operator or Concessionaire. The Gaming Machine shall operate legally only when a lawful operation sticker is attached to it and has not been altered in any way.

Article 38

PROCEDURE FOR CERTIFYING GAMING MACHINES

- 38.1 Gaming Machines shall be certified by the HGC, upon submission of a relevant application. The application shall include:
- 38.1.1 The particulars of the applicant.
 - 38.1.2 The Gaming Machine Manufacturer and/or Importer Certification code number, provided by the HGC.
 - 38.1.3 The commercial name and model of the gaming machine to be certified.
 - 38.1.4 The unique serial number of the gaming machine given by the Manufacturer.
- 38.2 The application shall be accompanied by:
- 38.2.1 Proof of payment of the requisite charge.
 - 38.2.2 An official declaration signed by the person submitting the application or their legal representative, with certified signature authenticity, stating that: all information included in the application form, and in the accompanying documents, is true and that the gaming machine for which certification is requested has not been tampered with or subjected to changes affecting its CE declaration of conformity.
 - 38.2.3 Clear photocopies, according to the provisions of paragraph 2 of article 11 of Law 2690/1999 (A 45), as in force:
 - b. of the CE declaration of conformity.

b. of the certificate of conformity for the specific type of gaming machine with the Technical Specifications and this Regulation which has been issued by a Certification Body. In case the certificate of conformity has been issued in accordance with the technical specifications of other countries or the Certification Body issuing the certificate of conformity is accredited in the field of technical standards of other countries, the Game to be certified shall be treated according to the provisions of paragraphs 2.8 and 2.9.

38.3 The Gaming Machine Certification shall be valid from the date on which the lump-sum certification fee of subparagraph 39.1.2 is paid.

38.4 If additions and/or conversions are made to parts of the equipment accessible only through the special secure door of the Gaming Machine, the Certification shall ipso jure become void, and the Gaming Machine will need to be certified anew, according to the procedures stipulated in the Regulation.

38.5 In case of any change or imminent change to the information of paragraph 38.2.3 or to parts of the equipment located outside the area of the machine that is accessible only through the special secure door, a prior HGC approval shall be required for the Gaming Machine to continue to operate as a Certified Gaming Machine. The relevant application shall be accompanied by documentation of any change and payment of the stipulated relevant charge.

Article 39

GAMING MACHINE CERTIFICATION FEES

39.1 The following amounts shall be paid for Gaming Machine Certification:

39.1.1 An application charge;

39.1.2 A lump-sum Game Certification fee.

39.2 The procedure for payment of the prescribed charges and fees is described in paragraph 56.2 of this Regulation.

CHAPTER X

PREMISES WHERE GAMES ARE CONDUCTED ON GAMING MACHINES

Article 40

PREMISES CERTIFICATION

40.1 In order to conduct Games on Gaming Machines it will be necessary to certify the Premises where they will be installed. That Certification shall be issued by the HGC following an application made by the Operator or Concessionaires.

40.2 Games playable on Gaming Machines may only be installed, operated and played at gaming-only premises. OPAP S.A. agencies shall be deemed Gaming Only Premises for the purpose of installation of Games, if they meet the terms and conditions laid down in this Regulation.

- 40.3 Certificates for Premises where Games are played on Gaming Machines may fall under one of the following three (3) categories:
- 40.3.1 Type B certification for Premises offering Games of Chance on Gaming Machines in Gaming Only Premises.
 - 40.3.2 Type E certification for Premises offering Games of Chance on Gaming Machines in sea-going vessels sailing international routes.
 - 40.3.3 Type F certification for OPAP S.A. agencies, offering the Games of Chance conducted by OPAP S.A., by virtue of the contract signed between OPAP SA and the Hellenic State, and the provisions of para. 2a of article 27 of Law 2843/2000 (A 219), as in force.
- 40.4 Regarding all Certified Premises:
- 40.4.1 Installation and/or operation of Non-Certified Games and Gaming Machines is prohibited;
 - 40.4.2 The conduct of Electronic Skills-Amusement Games is prohibited.
 - 40.4.3 At least (three) 3 m² of net area per Gaming Machine is required.
 - 40.4.4 The number of Certified Gaming Machines that can be installed and operated, shall not exceed the number stipulated in the relevant provisions of law.
 - 40.4.5 A sign indicating that the premises are lawful and showing the code number and the type of premises certification, must be displayed at a conspicuous location at the entrance to the Premises.
 - 40.4.6 The signs specified in Article 43 of this Regulation must be posted.
- 40.5 Certified Premises may not open for business before the Gaming Machine Certification codes and the unique ID for all systems and/or other equipment for conducting, supervising, and controlling the operation of Games to be installed in the Premises, as referred to in paragraph 45.3.2., are submitted to the HGC. Any change in that data shall be notified to the HGC before the corresponding Gaming Machine, system or equipment component becomes operational.

Article 41

LOCATION AND OPERATION OF PREMISES

- 41.1 Premises must comply with the terms and conditions in the applicable legislation on matters of planning, safety, fire safety, market control and sanitation.
- 41.2 Premises, irrespective of type, must not be co-located, adjoined or internally connected to other spaces in any way.
- 41.3 Premises shall have one main entrance located at a distance of not less than two hundred (200) meters of pedestrian travel, from the entrance to any primary or secondary education schools and boarding houses, whether such entrance is on the building or the courtyard perimeter.
- 41.4 No Premises shall operate at a specific location when, throughout the length of the same side of the City Block and on the respective side of the City Block across the street, there is a main entrance to a kindergarten. If the kindergarten is situated on the corner of two streets,

Premises cannot operate within the implied circle drawn around the centre, which is the point where the two streets meet, and with a radius equal to the length of the smaller of the two respective sides of the City Block. The above restrictions apply cumulatively.

- 41.5 The distance between premises shall be not less than two hundred (200) meters door to door, measured in pedestrian travel.
- 41.6 Type F Premises that were in operation before entry in effect of this decision, as in force, as well as Type E Premises, shall not be subject to the restrictions of paragraphs 41.3 and 41.4.
- 41.7 The business hours of Type B and F Premises with Gaming Machines for Games of Chance, shall be set by the Operator and Concessionaires between the hours of 09:00 and 02:00 the following day, or in the case of Friday or Saturday or the eve of an official holiday, the hours of 09:00 and 04:00 the following day, unless otherwise specified by the relevant provisions. For Type E Premises, business hours may be freely determined by decision of the ship's master at his own responsibility.
- 41.8 Gaming Machines must be installed so that they are not visible from outside the Premises.
- 41.9 It is prohibited to sell and/or consume alcoholic beverages in Certified Premises within the meaning of Article 144(8) of the Codified Law on Food and Beverages, as in force.
- 41.10 It is prohibited to install an Automatic Teller Machine (ATM) inside Premises or on the faces of Premises.

Article 42

PREMISES CERTIFICATION SPECIFICATIONS

- 42.1 Before HGC can certify Premises, Premises need to meet all the requirements set in the provisions in force and the specifications of this article.
- 42.2 Should any competent authority place a definitive ban on the operation of any Premises, the Premises Certification shall be revoked immediately. Such revocation shall occur ipso jure, with no further procedures or formalities, effective upon the date the ban was placed on the operation of the Premises.
- 42.3 Events referred to in paragraph 42.2 as well as any temporary ban of the Premises' operation, shall be notified by the Operator or Concessionaire to the HGC immediately.
- 42.4 Type B Premises Certification shall be granted on condition that the location where Gaming Machines are to be installed and operate:
 - 42.4.1 Is legal and intended for this main use, and is not connected internally with any other premises or shop.
 - 42.4.2 Observes the minimum net surface area within which each Gaming Machine must be installed, set at 3 m² per Gaming Machine. Net area shall mean the net surface area of the premises defined for this purpose, which must be fit for that purpose, precluding any other use.
 - 42.4.3 In addition to the area for installing Gaming Machines, the Premises must have, at least, the following:

- b. Five (5) m² for one (1) men's toilet and five (5) sq.m. for one (1) women's toilet, with anteroom.
- b. Ten (10) m² for the reception, cash-till and waiting area.
- c. Five (5) m² for storage area.

42.5 Type F Premises Certification shall be granted, upon the following conditions:

42.5.1 The Premises must be legal and fit for the intended purpose according to the registered main use.

42.5.2 It is a closed hall, and entry is only allowed through the inside of the OPAP Agency. In case the Premises are not fully separated from the rest of the OPAP SA Agency, the rules of accessibility and operation shall apply to all areas.

42.5.3 The minimum net surface area within which each Gaming Machine must be installed, is 3 m². Net area shall mean the net surface area of the premises defined for this purpose, which must be fit for that purpose, precluding any other use.

42.5.4 The total surface area where Gaming Machines are installed shall not be considered when calculating the minimum surface area required for the lawful operation of an OPAP S.A. agency, in terms of conducting all other games.

42.6 Type E Certification of Premises on sea-going vessels sailing international routes.

42.6.1 Sea-going vessels sailing international routes may have Gaming Only Premises exclusively for Games of Chance conducted on Gaming Machines. This area must hold a type E certificate.

42.6.2 The Type E Certification for Premises shall be granted where:

- a. An area on the vessel which can be used for Games of Chance played on Gaming Machines is specified as such in the vessel's certification of registration.
- b. That hall is an exclusive use hall and separate from other areas of the vessel.
- c. The minimum net surface area within which each Gaming Machine must be installed, is 3 m². Net area shall mean the net surface area of the premises defined for this purpose, which must be fit for that purpose, precluding any other use.
- d. In addition to the area where Gaming Machines are installed, the Premises must have a 10 m² area available as a reception, cash-till and public waiting area. The area of the Premises shall not be admeasured to the passengers sitting area, within the meaning of the Regulation on Accommodation, as in force each time.

Article 43

PREMISES SIGNS

43.1 All Certified Premises must clearly display a lawful operation certification mark at the entrance, indicating the premises code and certification type, in the format and with the features and content laid down by the HGC from time to time. The above mark shall be produced and printed at the Operator's and/or the Concessionaire's responsibility and expenses.

43.2 Both the interior and exterior of Premises shall display a sign prohibiting entry to persons

aged under 21 years old, and to Self-Excluded Players, and a warning sign about the risks of participating in Games.

Article 44

PREMISES MANAGER

- 44.1 A Premises Manager shall be appointed for each Certified Premises who shall be jointly and severally liable with the Operator or Concessionaire for complying with the provisions of the legislation and this Regulation and the relevant Decisions of the HGC.
- 44.2 The Premises Manager shall be obliged to observe and apply the Premises Certification terms and conditions, as well as any HGC decision or directive.
- 44.3 The Premises Manager must be a natural person aged between twenty five (25) and sixty (60), a permanent resident of Greece, meeting the following conditions:
- 44.3.1 Shall be a national of a European Union Member State.
- 44.3.2 Shall not have been convicted for a felony or given any sentence for theft, embezzlement, fraud, breach of trust, fencing, extortion, forgery, active or passive bribery, dangerous or gross bodily injury, concealment of a felony, currency related crime, dangerous crime, crime against personal freedom, crime against sexual freedom, crime of financial exploitation of sexual life, as well as for any crime stipulated in the law on narcotics, guns, explosives and tax evasion.
- 44.3.3 Shall not have been given any sentence for a crime foreseen under the applicable legislative and regulatory framework regarding games.
- 44.3.4 Shall possess at least a secondary education certificate or any corresponding certificate, and shall have fulfilled all military service obligations, or shall be under no such obligation, or shall have legally been released thereof.
- 44.3.5 Shall speak Greek.
- 44.4 The Premises Manager shall be obliged to:
- 44.4.1 Inspect the use of Gaming Machines and take all necessary measures to prohibit entry into the premises of persons under the age of twenty one (21) or Self-Excluded Players.
- 44.4.2 Discourage the irrational playing of Games.
- 44.4.3 Encourage players to take breaks from playing Games.
- 44.4.4 Ensure that only Certified Gaming Machines are installed in the Premises, on which only Certified Games are played.
- 44.4.5 Ensure that the Premises Certification sign and the signs of article 43 are properly posted and undamaged. Should the Premises Manager discover that any sign has been removed, tampered with or destroyed, he/she shall immediately notify the Operator or Concessionaire, as well as the HGC.
- 44.4.6 Immediately stop the use of any Certified Gaming Machine and promptly notify the Operator and the HGC, in case he/she discovers:

- a. any unauthorised intervention to a Certified Gaming Machine or Game;
- b. any malfunction to a Certified Gaming Machine, that does not allow for the Games to be normally conducted, according to this Regulation;
- c. wear giving rise to reasonable concerns about the safe operation of a Certified Gaming Machine;
- d. that the sign of article 37 of a Certified Gaming Machine has not been attached, has been removed, tampered with or destroyed.

44.4.7 Provide authorised officers of the HGC with uninterrupted access to Certified Gaming Machines and Games installed on the Premises which he/she manages.

Article 45

PREMISES CERTIFICATION PROCEDURE

- 45.1 In order to certify premises for the conduct of Games of Chance using Gaming Machines, an application shall be submitted by the Operator or Concessionaire to the HGC.
- 45.2 This application shall include the Operator's or Concessionaire's details, the details of the person appointed as Premises Manager, as well as the details of the person operating a Type F Premises.
- 45.3 The application shall be accompanied by:
- 45.3.1 An official declaration signed by the person submitting the application or their legal representative, with certified signature authenticity, stating that all information included in the application form and in accompanying documents is true.
 - 45.3.2 A list of all the Gaming Machines, their serial numbers, their installation positions based on the floor plan of item (b) of paragraph 45.3.6, as well as information on all the systems and/or other equipment used for the conduct, supervision and control of operation of the Games that will be installed in the Premises.
 - 45.3.3 A clear photocopy of the original title of ownership or lease agreement of the premises, attested by a public authority, or a clear photocopy of a true copy thereof authenticated by a lawyer.
 - 45.3.4 In the case of an apartment building, a clear photocopy of the original building regulation, attested by public authority, or a clear photocopy of a true copy thereof authenticated by a lawyer, evidencing that it is not prohibited to use the proposed space as a Gaming Premises.
 - 45.3.5 In case of Type F Premises, a certificate of OPAP SA on the lawful operation of the agency, and in case of Type E Premises, a clear photocopy of the original or of a true copy of the vessel registration document.
 - 45.3.6 A floor plan of the facilities for which the application is being submitted, as follows:
 - a. A clear and legible photocopy of the original or of the true copy of the facilities' floor plan, at a legible scale.
 - b. A drawing from a qualified engineer or technology engineer of the floor plan of the premises, which clearly indicates the positions where Gaming Machines will

be installed, as well as all the other systems and/or equipment. The drawing must also outline and indicate all other spaces in the Premises intended for other uses.

- c. A declaration by a qualified engineer or technology engineer, with certified signature authenticity, confirming that:
 - c.1 the space of the Premises appearing on the floor plan is legal and compatible with the intended use as a Gaming Hall;
 - c.2 the net surface area of the Gaming Machine positions and the spaces for all other functions of the Premises, is consistent with the area stipulated in the relevant provisions and this decision;
 - c.3 in the case of type F Premises, the surface area of the hall where Gaming Machines are installed, has not be taken into account in calculating the minimum surface area required in the specifications for lawful operation of an OPAP S.A. agency, in terms of all other Games;
 - c.4 all fire-protection measures stipulated in the legislation in force each time, are observed;
 - c.5 the distance from Certified Premises and from the main entrance of primary and secondary education schools and boarding houses, is consistent with the provisions of paragraphs 41.3 and 41.4 (exact distance in meters is indicated in full and in numbers).

For the person appointed as the Premises Manager:

- a. Clear photocopies, according to the provisions of paragraph 2 of article 11 of Law 2690/1999 (A 45), as in force:
 - a₁. Of the identity card or passport,
 - a₂. The qualifications (at least secondary school or equivalent),
 - a₃. A Certificate of Attainment in Greek, level B2 at least, issued pursuant to PD 60/2010 (A 98), required in case the candidate does not have qualifications from a Greek school.
 - a₄. A permanent residence registration certificate, pursuant to article 8 of PD 106/2007 (135/A), as in force.
- b. An official declaration signed by the candidate Premises Manager, with certified signature authenticity, stating the candidate:
 - b₁. Has been made aware of the Regulation's provisions and of his/her obligation to run the Premises in accordance therewith.
 - b₂. Has completed his military service or is not obliged to serve in the army or has been lawfully released from that obligation.
 - b₃. has not been convicted for a felony or given any sentence for theft, embezzlement, fraud, breach of trust, fencing, extortion, forgery, active or passive bribery, dangerous or gross bodily injury, concealment of a felony, currency related crime, dangerous crime, crime against personal freedom, crime against sexual freedom, crime of financial exploitation of sexual life, as

well as for any crime stipulated in the law on narcotics, guns, explosives and tax evasion.

- b₄. has not been given any sentence for a crime foreseen under the applicable legislative and regulatory framework regarding games.

45.3.7 Proof of payment of the requisite charge.

45.4 The Premises Certification granted by HGC shall enter into effect one day after it is issued and remain valid indefinitely, provided the lump-sum certification fee of subparagraph 46.1.2 is paid.

45.5 Should there be any change in the above information, except that in the following paragraph, an application will need to be submitted to the HGC for renewal of the Premises Certification terms. This renewal application shall be accompanied by documentation of any change and payment of the stipulated relevant charge.

45.6 Once Certification is granted, the following can change by way of a plain notification.

45.6.1 The company name, registered office, contact details and legal representative of the undertaking operating the Certified Premises.

45.6.2 Renewal or change of the terms of the lease referred to in subparagraph 45.3.3.

45.6.3 Renewal of the validity of the documents referred to in subparagraph 45.3.5.

The above changes and relevant documentation thereof shall be notified to the HGC by the Operator or the Concessionaire, within seven (7) days from the date such changes occurred.

Article 46

PREMISES CERTIFICATION FEES AND CHARGES

46.1 The following amounts shall be paid for Premises Certification:

46.1.1 An application charge;

46.1.2 A lump-sum premises certification fee shall be paid in advance in order for the Premises Certification to be granted. The lump-sum fee shall be paid upon notice by the HGC informing the applicant that their application has, initially, been reviewed and approved. Failure to pay the lump-sum certification fee entails non-granting of the Certification.

46.1.3. In order for the Premises to operate legally, an annual fee must be paid not later than the lapse of one (1) year from the date such fee was first paid by the Operator or Concessionaire. Failure to pay the annual fee in due time shall ipso jure entail the revocation of the Premises Certification.

46.2 The procedure for payment of the prescribed charges and fees is described in paragraph 56.2 of this Regulation.

CHAPTER XI

CERTIFICATION AND REGISTERS OF PROFESSIONALS

Article 47

CERTIFICATION AND ENTRY INTO THE REGISTER OF MANUFACTURERS

- 47.1 For a Manufacturer to be able to supply, sell, resell, lease, promote, offer, distribute and in general market any Game or Gaming Machine they manufacture legally, they must hold a Manufacturer Certification by HGC.
- 47.2 In order for a person to acquire the HGC Manufacturer Certification, they must meet all the following conditions:
- 47.2.1 They must exercise this activity as an official professional operation.
- 47.2.2 They must hold an operating license or be lawfully exempted from the obligation to hold one.
- 47.3 Certified Manufacturers shall be entitled to use the HGC trademark on their commercial documentation and in Commercial Communications, under the terms and conditions laid down by the HGC from time to time.
- 47.4 Manufacturer Certification shall be granted following an application submitted to the HGC which includes the details of the person submitting it.
- 47.5 If the person is located abroad, they shall nominate a legal representative in Greece, by way of a special power of attorney, who must be permanent resident in Greece, who shall submit the application referred to in the previous paragraph.
- 47.6 The application shall be accompanied by:
- 47.6.1 An official statement from the person's legal representative, with certified signature authenticity, stating that:
- a. all information included in the application and the documents accompanying it is true;
 - b. the person is not bankrupt, in liquidation, compulsory receivership or any other legal state, preventing it from lawfully engaging in trade;
 - c. has at no time in the past lost its Manufacturer license or Manufacturer certification for games of chance equipment in any country.
- 47.6.2 A list setting out the unique commercial name (version name and number) of Games or Gaming Machines that the applicant Manufacturer produces.
- 47.6.3 Clear photocopies, according to the provisions of paragraph 2 of article 11 of Law 2690/1999 (A 45), as in force, of any other certificates or licenses held as Manufacturer of Games or Gaming Machines, accompanied by an official translation in Greek, if granted by bodies abroad.
- 47.6.4 Clear photocopies, according to the provisions of paragraph 2 of article 11 of Law 2690/1999 (A 45), as in force, of:
- a. The statement of commencement of business activities or modification of business activities filed with the tax office (DOY), evidencing that the business activity is the manufacture of Gaming Machines and/or Games;
 - b. In case of a legal entity, copies of the documents (Government Gazette issue, Articles of Association, power of attorney) nominating the legal representative.
 - c. The operating license of the entity, or the legal document showing that the entity

is exempt from the obligation of holding an operating license.

d. A certificate of registration with the relevant Chamber of Commerce.

Where the person has its registered office abroad, equivalent documents from the competent authority in the country of establishment (officially translated into Greek) shall be submitted.

47.6.5 Proof of payment of the requisite fee.

47.7 Should there be any change in the above information, a, application will need to be submitted to the HGC for renewal of the Manufacturer Certification terms. This renewal application shall be accompanied by documentation of any change and payment of the stipulated relevant charge.

47.8 After recording into the register, the following can change by way of a plain notification.

47.8.1 The registered office, contact details, as well as the details of the legal representative or of the applicant's legal representative.

47.8.2 The acquisition of additional certifications or suitability licenses referred to in subparagraph 47.6.3 and/or renewal of the validity of those already submitted;

47.8.3 A sample list of Games or Gaming Machines of subparagraph 47.6.2.

The above changes and relevant documentation thereof shall be notified to the HGC by the Manufacturer, within seven (7) days from the date such changes occurred.

The following shall be paid for Manufacturer Certification, entry in the register, and for maintaining that entry in the Register of Manufacturers:

47.8.4 An application charge;

47.8.5 The annual fee for maintaining the entry in the register. The lump-sum fee shall be paid upon notice by the HGC informing the applicant that their application has, initially, been reviewed and approved. Failure to pay the annual fee entails non-granting of the Certification.

47.8.6 After the first payment, manufacturer shall pay an annual fee, not later than one (1) year after payment of the previous year's fee. Failure to pay the annual fee, shall ipso jure entail the revocation of the Certification.

47.8.7 The procedure for payment of the prescribed charges and fees is described in paragraph 56.2 of this Regulation.

Article 48

CERTIFICATION AND ENTRY IN REGISTER OF IMPORTERS

48.1 For an Importer to be able to supply, sell, resell, lease, promote, offer, distribute and in general market any Game or Gaming Machine they manufacture legally, they must hold an Importer Certification by HGC.

48.2 In order to obtain Importer Certification from the HGC an entity must be professionally engaged in an activity relating to the trading in Games or Gaming Machines or the provision of related services.

- 48.3 Certified Importers shall be entitled to use the HGC trademark on their commercial documentation and in Commercial Communications, under the terms and conditions laid down by the HGC from time to time.
- 48.4 Importer Certification shall be provided following an application submitted to the HGC.
- 48.5 If the person is located abroad, they shall nominate a legal representative in Greece, by way of a special power of attorney, who must be a natural person permanently residing in Greece, who shall submit the application referred to in the previous paragraph.
- 48.6 The application shall be accompanied by:
- 48.6.1 An official statement from the entity's legal representative, with certified signature authenticity, stating that:
- a. all information included in the application and the documents accompanying it is true;
 - b. the person is not bankrupt, in liquidation, compulsory receivership or any other legal state, preventing it from lawfully engaging in trade and services;
 - c. has at no time in the past lost its Importer license or Importer certification for games of chance equipment in any country.
- 48.6.2 An indicative list containing the unique commercial name (version name and number) and the Manufacturer of the Games or Gaming Machines they sell.
- 48.6.3 Clear photocopies, according to the provisions of paragraph 2 of article 11 of Law 2690/1999 (A 45), as in force, of any other certificates or licenses held as an Importer of Games or Gaming Machines, accompanied by an official translation in Greek, if granted by bodies abroad.
- 48.6.4 Clear photocopies, according to the provisions of paragraph 2 of article 11 of Law 2690/1999 (A 45), as in force:
- a. The statement of commencement of business activities or modification of business activities filed with the tax office (DOY), evidencing that the business activity is the trading in of Gaming Machines and/or Games or the provision of related services;
 - b. In case of a legal entity, copies of the documents (Government Gazette issue, Articles of Association, power of attorney) nominating the person submitting the application;
 - c. Documents demonstrating that the applicant has approval from the relevant Manufacturers to sell the products included in the sample list in subparagraph 48.6.2 in Greece, at the very least;
 - d. A certificate of registration with the relevant Chamber of Commerce.
- Where the applicant has its registered offices abroad, equivalent documents from the competent authority in the country in which it is established (officially translated into Greek) shall be submitted.
- 48.6.5 Proof of payment of the requisite fee.
- 48.7 Should there be any change in the above information, a, application will need to be submitted to the HGC for renewal of the Importer Certification terms. This renewal application shall be

accompanied by documentation of any change and payment of the stipulated relevant charge.

48.8 After entry in the Register, the following items may be amended without requiring approval from the HGC:

48.8.1 Registered office, contact details and legal representative of the applicant;

48.8.2 The acquisition of additional certifications or suitability licenses referred to in paragraph 48.6.3 and/or renewal of the validity of those already submitted;

48.8.3 The sample list of Games or Gaming Machines referred to in paragraph 48.6.2 either by adding newer ones or removing older ones.

48.9 The above changes and relevant documentation thereof shall be notified to the HGC by the Importer, within seven (7) days from the date such changes occurred. The following shall be paid for Importer Certification, entry in the register, and for maintaining that entry in the Register of Importers:

48.9.1 An application charge;

48.9.2 The annual fee for maintaining the entry in the register, payable in advance. The lump-sum fee shall be paid upon notice by the HGC informing the applicant that their application has, initially, been reviewed and approved. Failure to pay the annual fee entails non-granting of the Certification.

48.9.3 After the first payment, Importer shall pay an annual fee, not later than one (1) year after payment of the previous year's fee. Failure to pay the annual fee, shall ipso jure entail the revocation of the Certification.

48.9.4 The procedure for payment of the prescribed charges and fees is described in paragraph 56.2 of this Regulation.

CHAPTER XII

CONTROL - SANCTIONS

Article 49

CONFORMITY CONTROL

49.1 The HGC shall proceed with any control of conformity in observing the provisions in this Regulation.

49.2 The Operator, the Concessionaires, their staff, the Premises Managers, as well as the cooperating Technicians and Subcontractors, shall be obliged to provide the HGC and its authorised offices with access to any information on the conduct of Games, in the manner and at the time set by the Authority.

49.3 The HGC shall conduct investigations, either ex officio or following any complaint, and shall impose sanctions where it finds violations to the provisions of the Regulation.

49.4 Games organised and conducted in violation of the provisions of this Regulation, shall incur the sanctions of article 51 herein.

Article 50

VIOLATIONS DISCOVERED

- 50.1 Duly authorised investigations teams shall be set-up by HGC decision.
- 50.2. Such teams shall confirm the existence of a violation and prepare a report.
- 50.3 In case multiple violations are discovered, each will be described separately in the report of para. 50.2.

Article 51

ADMINISTRATIVE SANCTIONS

- 51.1 In case of violation of any of the provisions in this Regulation, the HGC shall impose the following sanctions:
- 51.1.1 Fine The fine shall be imposed as a sanction to a specific confirmed violation and is conducive to preventing any repetition of similar acts or omissions in the future. The amount of the fine must be such so as to have the needed deterrent effect. Fines imposed for each violation are described in the Appendix of Article 57 hereto.
- 51.1.2 Temporary suspension or permanent revocation of the right to conduct Games, depending on the gravity and/or frequency of the violation.
- 51.1.3 The HGC shall also be entitled to revoke Certifications either temporarily for up to three (3) months or permanently.

Article 52

PROCEDURE FOR IMPOSING SANCTIONS

- 52.1 Upon confirmation of the violation pursuant to the procedure of article 50 herein, the HGC shall invite the violating party to offer explanations and then shall review the case on whether or not to impose sanctions, according to the applicable provisions.
- 52.2 Any notice, notification, invitation and service on the part of the HGC may also be conducted electronically and, in any case, in a way offering confirmation of receipt of the above documents.
- 52.3 The HGC's sanctions imposing decisions shall be posted on the Authority's official website.
- 52.4 Fines shall be paid to a bank account of the HGC, within thirty (30) days from the date the fine imposing document is issued. This deposit constitutes collection of the corresponding fine, evidenced by the bank deposit slip, on which there must be an explicit reference to the type

of fine, as well as the full details of the liable person. As soon as the payee presents the above deposit slip, the HGC shall issue the corresponding receipt.

52.5 If the fine is not paid within the above deadline, it shall be assessed and collected according to the provisions of the Public Revenue Collection Code.

Article 53

RELAPSE

53.1 Any party committing two high importance violations, or one high importance and two medium importance or four medium importance violations within one year, shall be considered in relapse. In case of relapse, the stipulated fine doubles. The same applies for any violation subsequent to the one that caused a relapse.

53.2 Any party committing a fourth high importance violation or a sixth medium importance violation, within one year from the first violation, shall be considered in habitual relapse. In this case, the administrative sanction of temporary revocation of license shall be imposed. If the party in habitual relapse commits another high or medium importance violation within eighteen (18) months from the first violation, then the administrative sanction of permanent revocation of license shall be imposed.

53.3 For the purpose of applying the provisions of paragraphs 53.1 and 53.2, very high importance violations are considered high importance violations.

53.4 Notwithstanding the above provisions, committing two very high importance violations in one year shall incur the administrative sanction of permanent revocation of license.

Article 54

FINE CALCULATION CRITERIA

54.1 The HGC shall impose fines according to the provisions of the Regulation, depending on the gravity of the violation.

54.2 The fine imposed increases if there are aggravating circumstances. These are:

54.2.1 Having committed a confirmed violation of the Regulation's provisions in the past.

54.2.2 Refusal to cooperate with or attempted obstruction of the HGC and its bodies, while conducting its investigation of the case at hand.

54.2.3 The financial benefit gained or sought.

54.2.4 The size of the public exposed to the act or omission of the violation.

54.3 The imposed fine is reduced when the persons liable for the violation, cooperated effectively with the HGC, in order to discover the causes of the violation and/or reinstate things to their lawful condition and/or lift all the results of the violation.

54.4 Where there are simultaneously both aggravating and extenuating circumstances, the amount of the fine is initially increased on the basis of the aggravating circumstances, and then, the resulting amount is reduced on the basis of the extenuating ones.

54.5 When there are multiple violations, the fine is calculated separately for each one.

54.6 The violations of the provisions in paragraphs 3.2 and 5.3 come under the next higher importance category (e.g. a high importance violation will be handled as a very high importance violation, etc.)

Article 55

FINE CALCULATION METHODOLOGY

55.1 The fine calculation methodology for each violation confirmed according to the provisions of article 50 herein, is broken down as follows:

55.1.1 An intensity of gravity (EB_i) is defined, calculated on the basis of the violation type, in conjunction with the following targets, the achievement of which was negatively affected by the violations:

- a. Protecting the interests of the State (Σ_1).
- b. Ensuring observance of the terms for the conduct of Games (Σ_2).
- c. Deterrence from the commission or the risk of commission of felonies or of supporting crimes, while conducting Games (Σ_3).
- d. Protecting the interests of society (Σ_4).

55.1.2 In calculating the intensity of gravity (EB_i), each violation (i) is initially given a separate value ($T\Sigma_{ij}$) for each of the above targets (j), based on the negative impact that the result of the violation has, or may have, on these targets. The scoring values given are 0, 5, 10, 15 and 20. The intensity of gravity of each violation (EB_i), is the average of the values ($T\Sigma_{ij}$) of the violation (i) per target (j). Namely:

$$EB_i = \frac{\sum_{j=1}^4 T\Sigma_{ij}}{4}$$

55.1.3 Depending on the intensity of gravity (EB_i), violations are distinguished into four (4) categories (k) of importance, as follows:

n	Intensity of Gravity Scope	Importance Categories
1	$0 < EB_i \leq 5$	Low
2	$6.25 \leq EB_i \leq 10$	Medium
3	$11.25 \leq EB_i \leq 15$	High
4	$16.25 \leq EB_i \leq 20$	Very High

55.1.4 For each importance category the scale of the fine is the following:

- For low importance violations, the minimum fine is set at €1,000 and the maximum fine at €20,000, i.e. double the category minimum.
- For medium importance violations, the minimum fine is set at the amount of the previous category's maximum fine, increased by 25%, and the maximum fine at double the minimum, i.e. from €25,000 to € 50,000.
- For high importance violations, the minimum fine is set at the amount of the previous category's maximum fine, increased by 25%, and the maximum fine at double the minimum, i.e. from €62,500 to €125,000.
- For very high importance violations, the minimum fine is set at the amount of the previous category's maximum fine, increased by 25%, and the maximum fine at €400,000.

55.1.5 Determination of the fine in for each violation (Π_i), results from the intensity of gravity (EB_i) in relation to the importance category, pursuant to the following function:

$$\Pi_i = \begin{cases} K_1 + \frac{EB_i - \min EB_1}{c} \cdot \frac{A_1 - K_1}{\sigma}, & \min EB_1 < EB_i \leq \max EB_1 \\ K_2 + \frac{EB_i - \min EB_2}{c} \cdot \frac{A_2 - K_2}{\sigma}, & \min EB_2 < EB_i \leq \max EB_2 \\ K_3 + \frac{EB_i - \min EB_3}{c} \cdot \frac{A_3 - K_3}{\sigma}, & \min EB_3 < EB_i \leq \max EB_3 \\ K_4 + \frac{EB_i - \min EB_4}{c} \cdot \frac{A_4 - K_4}{\sigma}, & \min EB_4 < EB_i \leq \max EB_4 \end{cases}$$

Where:

K_k : the minimum fine of importance category k.

A_k : the maximum fine of importance category k.

$\min EB_k$: the minimum intensity of gravity for importance category k.

$\max EB_k$: the maximum intensity of gravity for importance category k.

- c: the quotient of the maximum intensity of gravity score to the number of different values
($c = \frac{20}{16} = 1,25$).
- σ: possible values of the average between minimum and maximum score of each importance category.

55.1.6 According to the above, allocation of fines by category of importance results from the following table:

FINE AMOUNT PER INTENSITY OF GRAVITY		
Importance Category	Intensity of Gravity (average)	Fine
	0	
Low	1.25	€1,000.00
	2.5	€13,333.33
	3.75	€16,666.67
	5	€20,000.00
Medium	6.25	€25,000.00
	7.5	€33,333.33
	8.75	€41,666.67
	10	€50,000.00
High	11.25	€62,500.00
	12.5	€83,333.33
	13.75	€104,166.67
	15	€125,000.00
Very High	16.25	€156,250.00
	17.5	€237,500.00
	18.75	€318,750.00
	20	€400,000.00

55.1.7 Implementation example of the above methodology:

Example: Violation of the provision of paragraph 5.3 "Issuing more than one Individual Player Card per Player", shall be scored on the basis of the targets, as follows:

Protecting the interests of society (ΤΣi1)	Ensuring observance of the terms for the conduct of Games (ΤΣi2)	Deterrence from the commission or the risk of commission of felonies or of supporting crimes, while conducting Games (ΤΣi3)	Protection of the interests of the State (ΤΣi4)
20	20	20	20

Therefore, the average score per target is:

$$EB_i = \frac{\sum_{j=1}^4 T\Sigma_{ij}}{4} = \frac{T\Sigma_{i1} + T\Sigma_{i2} + T\Sigma_{i3} + T\Sigma_{i4}}{4} = \frac{20 + 20 + 20 + 20}{4} = \mathbf{20,00}$$

The EB_i value ranks this violation in the Very High Importance category (4), therefore, the fine amount is:

$$\Pi_i = K_4 + \frac{EB_i - \min EB_4}{c} \cdot \frac{A_4 - K_4}{\sigma} = 156.250 + \frac{20 - 16,25}{1,25} \cdot \frac{400.000 - 156.250}{3} = 400.000 \text{ €}$$

CHAPTER VII

FINAL PROVISIONS

Article 56

CHARGES AND FEES

56.1 The amounts of charges and fees provided for in this decision, are defined by relevant regulatory decisions issued in accordance with the provisions of Law 4002/2012 (A 180), as in force.

The charges and fees provided for in this Regulation shall be paid into a bank account held by HGC for this purpose. This deposit constitutes collection of the corresponding charge or fee, evidenced by the bank deposit slip, on which there must be an explicit reference to the type of charge or fee,

as well as the full details of the liable person. As soon as the payee presents the above deposit slip, the HGC shall issue the corresponding receipt.

Article 57

APPENDIX

57.1 The following Appendix is attached to and constitutes an integral part of the Regulation.

57.2 The Appendix contains a table of all violations confirmed according to the provisions of article 50 of the Regulation, the separate value ($T_{\Sigma ij}$) of the violation for each of the targets of paragraph 55.1.1, the intensity of gravity (EB_i) resulting based on the score per target, the ranking of each violation by category of importance and the stipulated fine.

Article 58

ENTRY INTO FORCE

This decision shall enter into force upon promulgation in the Government Gazette.

APPENDIX A

Provisions	Description of Violation (ΣΕi)	Protecting the interests of society (ΤΣ1)	Ensuring the transparent and fair conduct of games (ΤΣ2)	Deterrence from the commission or the risk of commission of felonies or of supporting crimes, while conducting Games (ΤΣ3)	Protecting the interests of the State (ΤΣ4)	Intensity of gravity (EBi)	Surcharge due to minors involved	Importance Category	Fine amount (ΥΠi)
2.2_4.2	Associate and/or correlate Playing Behaviour with the personal details of Individual Player Card holders, by the GSS, the CIS and for Commercial Communication purposes (except loyalty programs).	15	15	20	0	12.50	0.00	High	€83,333.33

2.3	Access to Playing Behaviour by persons other than the Player, the HGC, as well as purpose-appointed and trained staff of the Operator or Concessionaire.	5	5	20	15	11.25	0.00	High	€62,500.00
2.4	Associate and/or correlate, in any way, Players' personal data with their Playing Behaviour, except for the purposes of compliance with the applicable legal and regulatory framework and for control purposes such as, in particular, restricting the access of minors and persons under 21, identifying players to real natural persons, providing data to a Player upon his request, cross referencing of tax liabilities arising from winnings and issuing winnings certificates in accordance with Article 14.	15	10	15	15	13.75	0.00	High	€104,166.67

3.2_43. 2_40.4. 6	Failure to post, inside and outside of Certified Premises, signs prohibiting persons under 21 and Self-Excluded Persons from entering and staying in the Premises.	5	0	0	0	1.25	0.00	Low	€10,000.00
3.3.2_1 6.1	Not having a Game Guide available for every Certified Game.	10	10	0	0	5.00	0.00	Low	€20,000.00
3.3.2	Not having information leaflets on Responsible Gambling available.	5	0	0	0	1.25	0.00	Low	€10,000.00
3.4	Not providing a help-line.	5	0	0	0	1.25	0.00	Low	€10,000.00
5.3_5.9 .5	Issuing an Individual Player Card to persons aged under 21 and/or to Self-Excluded Players.	20	20	20	0	20.00	5.00	Very High	€400,000.00
5.3	Issuing more than one Individual Player Card per Player.	20	20	20	20	20.00	0.00	Very High	€400,000.00

5.4	Failure to provide information to the HGC on Self-Excluded Players and on Players to whom additional restrictions have been imposed at their own request or following an HGC decision.	20	10	10	0	10.00	0.00	Medium	€50,000.00
5.4_5.5_5.9	Issuing, providing and operating Individual Player Cards without observing the conditions of the provisions of para. 5.4, 5.5 and 5.9.	20	20	15	20	18.75	0.00	Very High	€318,750.00
5.11	Failure to cancel an Individual Player Card at the request of the Player.	20	20	20	10	17.50	0.00	Very High	€237,500.00
5.12	Partial or total lifting of the restrictions set by the Player, in violation of the provision of para. 5.12.	20	20	10	0	12.50	0.00	High	€83,333.33
5.13	Issuing an Individual Player Card in spite of an HGC decision to the contrary.	20	20	20	20	20.00	0.00	Very High	€400,000.00
5.14	Failure to cancel the Individual Player Card when the Player reports it to have been stolen, lost or destroyed or following a revocation decision from the HGC.	20	20	20	10	17.50	0.00	Very High	€237,500.00

6.3.3_7 .7_40.1 _40.4.1	Installation and operation of gaming machines, certified or not, in non-certified premises.	20	20	20	20	20.00	0.00	Very High	€400,000.00
6.3.3_7 .5_7.7_ 31	Operation of non-certified games and/or gaming machines in Certified Premises.	20	20	20	20	20.00	0.00	Very High	€400,000.00
6.3.3_7 .7_31_ 40.1_4 0.4.1	Operation of Certified Games and/or Gaming Machines in non-certified premises.	20	20	20	20	20.00	0.00	Very High	€400,000.00
6.3.4_7 .7	Allowing wagers between Players and/or third parties based on predicting the result of Games played.	20	15	15	15	16.25	0.00	Very High	€156,250.00
45.5	Any change in the facts that were taken into account in the Certification of the Premises, in violation of the provisions of para. 45.5	15	15	20	0	12.50	0.00	High	€83,333.33
45.6	Any change in the facts that were taken into account in the Certification of the Premises, in violation of the provisions of para. 45.6	5	10	10	10	8.75	0.00	Medium	€41,666.67

47.7_4 8.7	Any change in the facts that were taken into account in the Certification of the Manufacturer and/or Importer, in violation of the provisions of para. 47.7 and 48.7	5	15	5	15	10.00	0.00	Medium	€50,000.00
47.8_4 8.8	Any change in the facts that were taken into account in the Certification of the Manufacturer and/or Importer, in violation of the provisions of para. 47.8 and 48.8	5	10	10	10	8.75	0.00	Medium	€41,666.67
6.3.6_7 .7	Access to the settings of a Certified Gaming Machine or the software of a Certified Game, by a person who is not a Certified Technician.	20	20	20	20	20.00	0.00	Very High	€400,000.00
6.3.7a_7.7_44. 4.7	Failure to interrupt the operation of a Certified Gaming Machine in case of unauthorised intervention to a Certified Gaming Machine or Game.	20	20	20	20	20.00	0.00	Very High	€400,000.00

6.3.7 b_c_7. 7_44.4. 7	Failure to interrupt the operation of a Certified Gaming Machine or returning a Certified Gaming Machine to operation before any problem is fully addressed and before ensuring that the Gaming Machine meets all the conditions taken into account during Certification.	20	20	10	10	15.00	0.00	High	€125,000.00
6.3.7_7 .7	Failure to immediately inform the HGC of the events of paragraph 6.3.7, as well as of the measures to address them and the results thereof.	10	10	10	10	10.00	0.00	Medium	€50,000.00

6.3.10_7.7_22.1.2	Failure to give authorised officers of the HGC, full and uninterrupted online and/or physical access to the Central Information System, the Game System Servers, the Communication Networks, the Premises and facilities, as well as the Certified Gaming Machines and Games, of both the Operator and the Concessionaires, and failure to provide all the required information.	15	20	15	20	17.50	0.00	Very High	€237,500.00
6.5_7.7_20	Failure to comply with the applicable, each time, legislation on the protection of Players' personal data.	20	15	15	15	16.25	0.00	Very High	€156,250.00
6.5_7.7	Failure to take the appropriate preventive measures making it impossible for third parties to identify Players.	20	5	15	10	12.50	0.00	High	€83,333.33

6.6_7.7	Failure to include the observance of obligations stemming from the applicable legislation and relevant regulatory provisions, the License, the Regulation and the HGC decisions, as a term in the contracts with the Concessionaires, OPAP SA agents, Subcontractors and staff employed.	5	5	10	10	7.50	0.00	Medium	€33,333.33
6.7_7.7	Failure to inform the HGC in case of violation by the Concessionaires, OPAP S.A.' s agents, subcontractors and staff, of the legislation regulating the gaming market and in particular the regulations which seek to combat fraud and crime, protect minors, to protect consumers, to prevent addiction to Games of Chance.	5	5	15	5	7.50	0.00	Medium	€33,333.33

6.8	Failure to meet the conditions required for natural persons to act as managers or directors of the Operator or the Concessionaires.	10	20	20	15	16.25	0.00	Very High	€156,250.00
7.1	Concessionaires ceding the right to operate Games of Chance played on Gaming Machines, with or without consideration.	10	20	20	15	16.25	0.00	Very High	€156,250.00
7.2	Failure of the Operator or the Concessionaires to submit a copy of the concession contracts to the HGC, within fifteen (15) days of execution.	0	5	0	5	2.50	0.00	Low	€13,333.33
7.3	Concessionaires are Affiliated Companies.	10	10	15	10	11.25	0.00	High	€62,500.00
8.2	Failure to provide to the HGC the records of Subcontracting agreements.	0	5	5	5	3.75	0.00	Low	€16,666.67
9.1	Issuing of Individual Player Cards before the Player signs the Affiliation Agreement, in violation of the provisions of para. 1 of article 9.	20	20	10	10	15.00	0.00	High	€125,000.00

9.4	Failure to submit an Affiliation Agreement to the HGC for approval, or implementation of the Affiliation Agreement or any amendment thereto, without HGC approval.	20	15	10	20	16.25	0.00	Very High	€156,250.00
9.5	Failure to keep Affiliation Agreement acceptance data by the Operator and/or Concessionaires for a period of at least ten (10) years.	5	10	5	15	8.75	0.00	Medium	€41,666.67
10.1	Failure to observe the Games' Payout, in accordance with their Certification and the provisions in the Regulation.	20	20	20	10	17.50	0.00	Very High	€237,500.00
11.3	Extending any type of credit to Players and/or discount on the cost of participation, including any kind of gifts or other incentives, which seek to attract Players to play Games and/or to increase their wager.	20	20	20	10	17.50	0.00	Very High	€237,500.00

11.4	Not enabling Players to set their daily loss threshold.	20	20	20	10	17.50	0.00	Very High	€237,500.00
11.6	Failure to discontinue a Gaming Session once €70 has been spent.	20	20	20	10	17.50	0.00	Very High	€237,500.00
11.7_5. 12_17. 1_32.1. 10	Failure to inform Players according to the provisions of articles 5.12,11.7,17.1 and 32.1.10	20	20	20	10	17.50	0.00	Very High	€237,500.00
11.8	Failure to observe the maximum playing time of twelve (12) hours per week and forty (40) hours per month, cumulatively.	20	20	20	10	17.50	0.00	Very High	€237,500.00
11.9	Failure to register the details of Self-Excluded Players and Players who have introduced restrictions on their Playing Behaviour, in the Players Database along with information describing the Self-Exclusion or restrictions.	20	20	20	0	15.00	0.00	High	€125,000.00

11.10	The Online Player Account contains the date, time, Gaming Machine and amount wagered on each Gaming Session, the winnings and the current Player balance.	15	20	15	15	16.25	0.00	Very High	€156,250.00
13.1	The amount of winnings resulting from each Game Cycle shall be added as credits to the Player's available balance immediately after the Game Cycle is over.	15	20	10	10	13.75	0.00	High	€104,166.67
13.2	Failure to immediately pay out winnings to Players by crediting their Online Player Account or by issuing a cash-out ticket from the Gaming Machine.	20	20	10	10	15.00	0.00	High	€125,000.00
13.2	The procedure for paying winnings out to Players has not been approved by the HGC.	10	5	10	10	8.75	0.00	Medium	€41,666.67
13.2	Making payouts to Players without withholding the respective tax amount.	20	10	20	20	17.50	0.00	Very High	€237,500.00

13.2_1 3.3	Not enabling Players to cash out their available balance at any time or refusal to pay out winnings lower than a specific threshold.	20	20	15	10	16.25	0.00	Very High	€156,250.00
13.3	Amount blocked for participation in some next Game Cycle.	20	20	15	10	16.25	0.00	Very High	€156,250.00
14	Failure to supply Players with a certificate of winnings for tax purposes	20	10	20	20	17.50	0.00	Very High	€237,500.00
15.2.2	Failure to display Responsible Gambling messages on the main screen, including time spent playing, in such a way that they are perceived by Players as interference to their playing the Game, and long enough so that they are adequately understood.	20	20	5	10	13.75	0.00	High	€104,166.67

15.3	The Operator, Concessionaires, their staff, management, as well as anyone operating Gaming Machines for the conduct of Games, including their staff, participate in the Games that they conduct or that they are involved in.	20	20	20	10	17.50	0.00	Very High	€237,500.00
15.4	Participating in Games of Chance through interposed persons.	15	20	15	20	17.50	0.00	Very High	€237,500.00
16.2	Failure to include in the Game Guide the information of para. 16.2 of the Regulation.	20	20	5	5	12.50	0.00	High	€83,333.33

16.3_1 6.4	Failure to have the Game Guide available at a conspicuous location within the Certified Premises, or failure to inform the public of the existence of such a guide with every available means. Where some information or data about the Games offered is not included in the Game Guides or if they contain errors, the Operator and/or Concessionaires do not communicate same to the public with every available means.	5	5	0	0	2.50	0.00	Low	€13,333.33
17.1	Failure to display on the Gaming Machine screens the information stipulated in para. 1 of article 17, for as long as necessary and with such font size that will enable Players to easily read it.	5	10	0	0	3.75	0.00	Low	€16,666.67
17.1	Failure to display on the Gaming Machine screens the information stipulated in para. 1 of article 17.	20	20	10	0	12.50	0.00	High	€83,333.33

17.2	Not having info-screens operational in Premises participating in Venue Jackpots or Multi-Venue Jackpots.	20	20	15	10	16.25	0.00	Very High	€156,250.00
17.2	Failure to connect screens with the GSS, and failure to display the information of para. 2 of article 17.	20	20	15	10	16.25	0.00	Very High	€156,250.00
17.4	Failure to display the relevant message (e.g. "Jackpot temporarily unavailable"), in case of Jackpot interruption.	20	20	15	10	16.25	0.00	Very High	€156,250.00
18.1	Providing untrue, inaccurate or incomprehensible information or information that contains or is associated in any way with data that could be considered misleading.	20	20	15	10	16.25	0.00	Very High	€156,250.00
21	Failure to apply an effective and adequate system for the processing complaints of the public and of Players.	15	10	5	10	10.00	0.00	Medium	€50,000.00
21	Failure to keep a record of complaints	10	10	5	5	7.50	0.00	Medium	€33,333.33

22.1.1	Failure of the Operator or the Concessionaire to submit to the HGC the report of para. 22.1.1 of the Regulation.	0	0	0	5	1.25	0.00	Low	€10,000.00
22.1.2	Refusal of the Operator, Concessionaires or Premises Managers, to give authorised HGC agents access to their facilities, the facilities of Premises and all systems associated with the conduct, supervision and control of Games on Gaming Machines, and refusal to provide requested information.	15	20	15	20	17.50	0.00	Very High	€237,500.00
23.1	Failure of the Operator or Concessionaire to keep electronic records on all their functions and transactions relating to the organisation, conducts and management of Games of Chance, for at least ten (10) years.	5	10	5	15	8.75	0.00	Medium	€41,666.67

23.1	Failure to keep records on a medium enabling the storage of information in the form and manner referred in in para. 1 of article 23.	0	5	0	5	2.50	0.00	Low	€13,333.33
24.1_2 8.7	Organise, operate, conduct, monitor, control and manage Games on Gaming Machines with no connection to the CIS and the GSS.	15	20	15	20	17.50	0.00	Very High	€237,500.00
24.2_2 4.3	Lack of internet link of the CIS with the SCITS and failure to give the HGC continuous access to, ability to obtain and verify the data of paragraph 2 of article 24.	15	20	15	20	17.50	0.00	Very High	€237,500.00
27.2	The values generated by the Random Number Generator (RNG) shown in a particular format (e.g. deck of cards, ball, etc.) are not used in accordance with the rules of the Game.	20	20	20	20	20.00	0.00	Very High	€400,000.00

5.6_24. 12_25. 9_26.3 _27.3	The Individual Player Card Management System , the CIS, GSS, the Communications Network and the RNG do not have a valid certificate of conformity with the Technical Specifications and the Regulation, issued by a Certification Body.	20	20	20	20	20.00	0.00	Very High	€400,000.00
17.3_2 8.2_29 _30	Operation of a Venue Jackpot in violation of the terms of the Regulation and the Technical Specifications.	20	20	20	20	20.00	0.00	Very High	€400,000.00
17.3_2 8.2_29 _30	Operation of a Multi-Venue Jackpot in violation of the terms of the Regulation and the Technical Specifications and/or without Minister of Finance approval.	20	20	20	20	20.00	0.00	Very High	€400,000.00
28.7_2 9_30	Operation of Jackpots not controlled by the Operator's CIS and not connected to the GSS of the Operator or Concessionaire.	20	20	20	20	20.00	0.00	Very High	€400,000.00
31_32_ 35_36_ 40.2	Certified Gaming Machines and Games do not operate according to the Certification terms and conditions.	20	20	20	20	20.00	0.00	Very High	€400,000.00

35.5_3 5.6_35. 7	Disconnection or withdrawal of a Certified Gaming Machine without placing it in any of the states stipulated in paragraphs 35.5 and 35.6 or changing said state without prior notification of or approval from the HGC.	20	20	20	20	20.00	0.00	Very High	€400,000.00
35.9	Re-entering a Gaming Machine that was placed in one of the states of para. 35.5 and 35.6, into operation, without having first revoked said state.	20	20	20	20	20.00	0.00	Very High	€400,000.00
35.10	Failure to keep a log of all information regarding access to a Certified Gaming Machine stipulated in the Regulation.	20	20	20	20	20.00	0.00	Very High	€400,000.00
37.2	Failure to attach and place the sticker of Article 37 onto the Gaming Machines in a way that it is visible and readable by Players, and easily accessible by a person authorised by the Authority.	20	20	20	20	20.00	0.00	Very High	€400,000.00

6.3.8_7 .7_37.2	Operating a Gaming Machine without the lawful operation sticker attached or with a damaged sticker.	20	20	20	20	20.00	0.00	Very High	€400,000.00
38.4	Operating a Gaming Machine when there has been any change to any information of paragraph 38.2.3 or to equipment parts located within the area of the machine that is accessible only through the special secure door.	20	20	20	20	20.00	0.00	Very High	€400,000.00
38.5	Operating a Gaming Machine when there has been any change to any information of paragraph 38.2.3 or to equipment parts located outside the area of the machine that is accessible only through the special secure door.	20	15	20	20	18.75	0.00	Very High	€318,750.00
40.4.2	Electronic Skill-Amusement Games are conducted in a Certified Premises.	5	5	0	5	3.75	0.00	Low	€16,666.67

42	Certified Premises do not operate according to the terms and conditions of their Certification of articles 41.2 and 42.	15	20	15	20	17.50	0.00	Very High	€237,500.00
40.4.5_43.1	Failure to post the Certified Premises sign at a conspicuous location at the entrance to the Premises.	10	15	10	10	11.25	0.00	High	€62,500.00
41.7	Operating the Premises beyond the business hours of para. 41.7.	15	10	15	5	11.25	0.00	High	€62,500.00
41.9	Selling/consumption of alcoholic beverages (within the meaning of article 144 of the Food and Beverage Guide) in the Certified Premises.	15	10	15	5	11.25	0.00	High	€62,500.00
41.10	Installation of an ATM inside Premises or on their faces.	20	5	5	10	10.00	0.00	Medium	€50,000.00
42.2_42.3	Failure to notify the HGC of the events of paragraphs 42.2 and 42.3.	5	5	5	10	6.25	0.00	Medium	€25,000.00
43.3	Failure to comply with HGC directives regarding the form, content and placement of the signs of article 43.	10	15	5	15	11.25	0.00	High	€62,500.00

44.1_4 4.4	Failure of the Premises Manager to comply with the obligations of para. 44.4 .	10	10	10	10	10.00	0.00	Medium	€50,000.00
2.4	Failure to notify the HGC of the measures of paragraph 2.4.	10	5	10	10	8.75	0.00	Medium	€41,666.67

2. This Decision to be promulgated in the Government Gazette.

Athens, 25/2/2015

The Chairman

Evgenios Giannakopoulos.