



HELLENIC REPUBLIC

HELLENIC GAMING COMMISSION
HGC

INDEPENDENT PUBLIC AUTHORITY

ANNUAL ACTIVITY REPORT 2013

(Adopted by HGC Decision No. 98/14/21.3.2014)

Athens, March 2014

Edited by:

**Directorate of Planning and Operational Standards
Department of Research and Analysis**

The entire staff of the HGC has worked
to prepare the Activity Report for the year 2013.

The Annual Activity Report of the Hellenic Gaming Commission for the year 2013
is available online, at the website of the HGC:
<http://www.gamingcommission.gov.gr>

An introduction by the President of the HGC

In my previous year's introduction to the 1st Annual Activity Report, the first steps towards the creation of a public Authority from scratch, the challenges ahead and the plans already made were described. When I was writing last year's Report, the HGC had 16 employees and its offices were actually located in an apartment in Panepistimiou Ave.

Nowadays, the HGC has more than 100 staff -and is expecting another 60 people to be seconded from the public and the wider public sector. It is based in a modern building at Vathi Sq., at the beginning of Acharnon Ave. Its organizational structure is completed and it is moving fast in developing its infrastructure and activities.

In the following pages, one can read how these activities evolved; these implemented the approved Action Plan for the period 2013-2015. The legislative changes in 2013 added new projects to the activities of the HGC. Therefore, at the end of this Report, you will also find the revised Action Plan for the two-year period 2014-2015.

The Report is as detailed and extensive as it should be, so that the reader can have the full picture, but it is also Doric in style and avoids excessive decorations, which would distract attention from the substance.

Apart from the activities of the HGC, 2013 was also marked by the legislative work produced in the field of gaming, with a view to reshaping and completing the existing legislative framework by incorporating therein the lessons learned from previous experience. This year will see the conclusion of this endeavour and will conclude with the codification of the legislation.

2014 is also expected to be a tough year. The HGC will have to prove with its actions that it is a really experienced regulator of the difficult market that was assigned to it by the State.

At the end of 2013, the mandate of several members of the HGC expired. I would like to thank the members whose term ended on 31st December 2013, i.e. Mrs. Argyro Papadaki, Mr. Nikos Karaoulis and Mr. Thanasis Droulias. Their contribution towards the creation of the HGC was valuable and decisive. I would equally like to

welcome the new members of the HGC, Mrs. Dimitra Malliou-Andritsopoulou, Mrs. Gerasimoula Chalioti and Mr. Ioannis Dandoulakis, who are ready to prove themselves as their worthy successors. I should also extend my thanks to the remaining members of the HGC, who are still in the battle, i.e. Mrs. Maria Kostopoulou, Mrs. Elissavet Tsaliki, Mr. Kostas Katsoudas, Mr. Panagiotis Perrakis and Mr. Giannis Charalambidis and, last but not least, all the employees.

Finally, I would like to highlight the unstinting support and assistance from the political leadership and the Services of the Ministry of Finance, failing which many of the achievements, but mostly, many of the plans for the future would not have been possible.

The President of the Hellenic Gaming Commission

Evgenios Giannakopoulos

Athens, 21st March 2014

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INTRODUCTION

The Activity Report of the HGC for the year 2013 consists of twelve (12) chapters, laid out as follows:

Chapter 1 introduces the "Hellenic Gaming Commission", an independent administrative authority and, specifically, its mission, the regulatory and legislative framework underlying its activities, its operating rules and its organizational structure.

Chapter 2 introduces the gambling operators and the games on offer and presents the gaming market in Greece in terms of financial figures.

Chapters 3, 4, 5 and 6 provide a detailed presentation of the work that the HGC has done in the field of regulation and compliance inspection of the gaming market and in the field of social responsibility per game, game group or gaming operator.

Chapter 7 reports on the preparation and implementation of the internal rules of procedure of the HGC.

Chapter 8 reports on the systems developed for the organization and operation of the HGC, as well as on the recruitment of staff, the training of its employees, communication issues and the development of the necessary infrastructure.

Chapter 9 presents the most important financial figures for the HGC, namely its expenditure in 2013 and the budget for 2014.

Chapter 10 is a brief overview of the activities of the HGC Management.

Chapter 11 outlines the Operational Plan of the HGC for the year 2014.

CHAPTER 1: HELLENIC GAMING COMMISSION (HGC)**1.1 MISSION OF THE HGC**

The mission of the HGC as a key regulator of the gaming market (games of chance and amusement games) is to ensure legality in gaming activities, to protect the interests of players and the public at large, particularly of the minors and other vulnerable groups, and to monitor the state revenue collection process.

1.2 LEGAL FRAMEWORK OF OPERATION OF THE HGC

The HGC was originally set up in 2004 under Law 3229/2004 (GG Series A, No. 38). The law established an administrative authority under the name "Hellenic Gambling Commission" to take over the responsibilities to supervise and inspect games of chance, which rested with various other public bodies at that time. The Commission never took up duties or exercised its functions in its original form.

In 2011, by virtue of law 4002/2011 (GG Series A, No. 180), the Commission was renamed to "Hellenic Gaming Commission (HGC)" and was assigned additional powers relating to the supervision and compliance inspection of amusement games. The members of the HGC were appointed in late December 2011, while in February 2012 the Commission became an independent Public Authority under Law 4038/2012 (GG Series A, No. 14) and currently operates as such.

1.2.1 Primary law

In terms of primary law, the functions of the HGC are governed by the following Laws (in order of enactment):

- a) Law 3229/2004 (GG Series A, No. 38), Chapter C, Articles 16 through 23: "Hellenic Gambling Commission and matters relating to the operation of Casinos".
- b) Law 3634/2008 (GG Series A, No. 9), Article 23: "Amendments to Article 16 of Law 3229/2004 (GG Series A, No. 38)".
- c) Law 3691/2008 (GG Series A, No. 166) "Prevention and suppression of money laundering and terrorist financing and other provisions", whereby the HGC is designated as the competent Authority, which is responsible for overseeing the practical implementation of the law by casino enterprises, casinos on vessels under the Greek flag, enterprises, organizations and other entities organizing or providing gambling services, as well as by the agencies.
- d) Law 4002/2011 (GG, Series A, No. 180), Part D, Chapter H: "Regulation of the gaming market", Articles 25 through 54. The law assigned further powers to the public Authority that had already been established in 2004, but remained

inactive, and renamed it to "Hellenic Gaming Commission (HGC)". The HGC is now the Authority that is responsible for issuing licenses and certifications and supervising all sectors of the gaming industry.

- e) Law 4021/2011 (GG Series A, No. 218), Article 52: "Amendments to Law 4002/2011". The amendment regulates various issues regarding the pricing policy of the concessionaires, the process of certification of the licensees for the installation and operation of OPAP S.A. gaming machines, the administrative fees for the participation in the licensing tender and other related issues.
- f) Law 4038/2012 (GG Series A, No. 14), Article 7: "Regulation of matters relating to the Hellenic Republic Asset Development Fund and the HGC", paras. 10 through 26. In 2012, Law 4038/2012 (GG Series A, No. 14) was passed, whereby the Hellenic Gaming Commission (HGC) retained its powers and duties, its name and registered office and became an independent Public Authority enjoying full administrative and financial independence and autonomy as per Law 3051/2002, without prejudice to the special provisions referring to the HGC.
- g) Law 4141/2013 (GG Series A, No. 81), Chapter E "Other provisions regarding the responsibilities of the Ministry of Finance", Articles 22 through 24, regulated various issues regarding the organizational structure of the HGC, made corrections and additions to the existing gaming legislation, and regulated other issues regarding OPAP S.A.
- h) Law 4182/2013 (GG Series A, No. 185), Chapter N "Other provisions", article 92, whereby the HGC took over all the responsibilities of the Directorate of Casino Supervision of the Ministry of Tourism and the Casino Commission of Law 2206/1994 (GG Series A, No. 62).
- i) Law 4209/2013 (GG Series A, No. 253). Under article 106 of the Law, various issues regarding the granting of special licenses by the HGC for gambling on broadcast and telecommunications media and other related issues are regulated.
- j) Law 4182/2013 (GG Series A, No. 185), article 92 "Matters related to the Central State Aid Unit of the Hellenic Gaming Commission (HGC)", whereby the HGC took over all the responsibilities of the Directorate of Casino Supervision of the Ministry of Tourism and the Casino Commission of Law 2206/1994 (GG Series A, No. 62).
- k) Law 4223/2013 (GG Series A, No. 287), article 34, whereby various issues regarding the organizational structure of the HGC are regulated.

Along with the special provisions governing the HGC, the provisions of Law 3051/2002 (GG Series A, No. 220) also apply: "Independent Authorities established by the Constitution", as in force.

1.2.2 Regulatory legislation

As regards regulatory legislation, the most important decisions on the operation of the HGC are:

a. Decision No. 55906/1673/2011 of the Minister of Finance (GG Series "YODD" No. 444): "Establishment of the Hellenic Gaming Commission and appointment of its members", as amended by Decision No. 07/590/2013 of the Minister of Finance (GG Series "YODD", No. 451), which determined the composition of the Hellenic Gaming Commission until 31/12/2013, as follows:

- 1) Evgenios Giannakopoulos, Attorney at Law, President of the HGC (for a four-year term).
- 2) Konstandinos Katsoudas, Attorney at Law, Member of the HGC (for a four-year term).
- 3) Panagiotis Perrakis, Attorney at Law, Member of the HGC (for a four-year term).
- 4) Ioannis Charalampidis, Assistant Professor of e-Governance Information Systems at the University of the Aegean, Member of the HGC (for a four-year term).
- 5) Elissavet Tsaliki, Assistant Professor at the Department of Communication and Media, National Kapodistrian University of Athens, Member of the HGC (for a four-year term).
- 6) Athanasios Droulias, Attorney at Law, Member of the HGC (for a two-year term).
- 7) Nikolaos Karaoulis, retired Hellenic Police Force Brigadier, Member of the HGC (for a two-year term).
- 8) Maria Kostopoulou, Attorney at Law, Member of the HGC (for a two-year term).
- 9) Argyro Papadaki, Mechanical Engineer, National Technical University of Athens, Member of the HGC (for a two-year term).

Later on, when the term of the members with a two-year mandate ended, Decision No. GDOP 0000031 EX 2014 (GG Series "YODD", No. 24) of the Minister of Finance was issued, hereby the mandate of the HGC was renewed with the addition of the following members:

1. Ioannis Dandoulakis, International Policy Analyst, Member of the HGC.
2. Dimitra Malliou-Andritsopoulou, Teacher, Member of the HGC.
3. Gerasimoula Chalioti, Teacher, Member of the HGC.
4. Maria Kostopoulou, Attorney at Law, Member of the HGC.

- b. Joint Decision No. 56660/1679/22.12.2011 (GG. Series B, No. 2910) of the Minister of Finance and the Minister of Culture and Tourism on the "Confirmation of the Commencement of Operations of the Hellenic Gaming Commission (HGC)".
- c. Decision No. 6/1/24-4-2012 (GG Series B, No. 1347) of the HGC, issued pursuant to para. 5 of Law 4002/2011 (GG Series A, No. 180), titled: "Issues in the Organizational Regulation of the HGC pertaining to its financial management".
- d. Decision No. 10/3/11-6-2012 (GG Series B No. 2066) of the HGC, as in force, issued pursuant to para. 5 of Law 4002/2011 (GG Series A, No. 180), titled "Regulation of matters pertaining to the internal operation of the Hellenic Gaming Commission".
- e. Decision No. 51/4/2/26.4.2013 (GG Series B No. 1330) of the HGC, titled "Regulation of matters included in the Travel Regulation of the HGC", whereby issues related to the official trips of employees and members of the HGC are regulated.
- f. Decision No. 39/7/14.1.2013 (GG Series B No. 43) of the HGC, titled "Issues in the Organizational Regulation of the HGC pertaining to the leasing of property".
- g. Decision No. 64/3/23.07.2013 (GG Series B No. 1819) of the HGC titled "Regulation on the Organization, Operation and Structure of the Service Units of the Hellenic Gaming Commission", as in force. This Regulation set out the organizational structure of the HGC Services, the responsibilities of the individual service units and the distribution of employees per category, sector and specialty.

1.3 POWERS AND DUTIES OF THE HGC

The HGC is responsible for regulating, supervising and inspecting compliance in the gaming market, protecting the players and the public at large, particularly minors and vulnerable groups, and monitoring the state revenue collection process.

There are two basic types of games: games of skill, which are played for amusement, without gain, and games of chance.

The primary responsibilities of the HGC are to prepare and issue the statutory regulatory provisions, issue the statutory licenses and certifications and inspect compliance regarding all aspects of the gaming industry (gaming machines, games, gaming facilities, persons involved).

The relevant inspections intended to ensure the legality of games; compliance with the rules on transparent, honest and fair gaming; sound economic

management; due delivery of gains to winners; due collection of State taxes and compliance with the terms of gambling licenses. Moreover, the HGC is responsible for laying down and implementing proper frameworks and measures for the protection of minors and other vulnerable groups and for the prevention of illegal gaming, fraud, money laundering and similar crimes.

Lastly, the HGC has been appointed as the competent Authority to enforce the applicable administrative penalties. As regards gambling, the HGC has competence in the games operated by OPAP S.A. and casino enterprises, the mutual betting on horse races and the State Lotteries, regardless of the gambling method (land-based, online, etc.). The HGC is also responsible for gambling on broadcast and telecommunications media.

Finally, the HGC licenses, certifies and inspects compliance in the field of electronic amusement games, in accordance with the applicable provisions.

1.4 GENERAL RULES GOVERNING THE OPERATION AND FUNCTIONS OF THE HGC

By virtue of Resolution No. 8/6/25-05-2012, the HGC adopted a set of general rules which should be governing the activities related to its operation and the execution of its regulatory functions, which are set out below:

1.4.1 General rules governing the operation of the HGC

The general rules governing the operation of the HGC are set out below:

- a. Maximum utilization of available resources: The HGC must make full use of all human resources already available to the Greek State before seeking to acquire extra ones, so as to avoid increased costs both for the HGC and the State as a whole.
- b. Effective utilization of resources: The HGC must acquire and use resources only to the extent that these serve its needs and allow its smooth operation.
- c. Cost-effective management: The HGC must make all reasonable efforts to always improve its Return on Investment ratio.
- d. Ex-ante control: The HGC must carry out ex-ante controls to ensure the legality of its expenditure. To that effect, the HGC has requested from the Greek State to put it under prudential supervision by the Supreme Court of Audit.
- e. Prioritization of actions: Given that the HGC is getting organized for the first time, it must prioritize its activities in such a way as to serve the public interest in the most efficient manner.
- f. Effective response: The HGC must address all citizen requests as fast and thoroughly as possible, by considering them on the merits and avoiding bureaucracy.

1.4.2 General rules governing the regulatory functions of the HGC

The general rules governing the performance of the regulatory functions of the HGC are:

- a. Proportionality: The HGC must only intervene if necessary. All measures adopted must be appropriate to prevent the risk they address and all costs for the regulated entity must be justified.
- b. Accountability:
The HGC must justify its decisions and be subject to public scrutiny.
- c. Consistency: The HGC must lay down regulatory frameworks whose provisions and requirements are consistent with each other, and demonstrate impartiality in their enforcement.
- d. Transparency: The HGC must be open about its actions; it must introduce simple, clear and straightforward regulatory frameworks which can be easily understood by the users.
- e. Commitment: The HGC must be committed to resolving problems and minimize the negative impact that its decisions are likely to have.
- f. Social responsibility and empathy: In order to ensure responsible gaming, the HGC must be aware of and familiar with the needs of the public at large and be in direct and open contact with the citizens, focusing primarily on vulnerable groups.

1.5 ORGANIZATIONAL STRUCTURE OF THE HGC

Decision No. 64/3/23.7.2013 (GG Series B, No. 1819) of the HGC established the Rules on the Organization, Operation and Structure of its Service Units. The organizational structure of the HGC is summarized as follows:

1.5.1 The President of the HGC

The President of the HGC, who is designated by the applicable law as the person who has the overall responsibility to manage and oversee the HGC, exercises all his powers to execute these responsibilities. The following service units report directly to the President of the HGC:

- a. General Directorate
The General Directorate coordinates and oversees the work of the individual Directorates falling under its responsibility and assists the President of the HGC in coordinating the operations of the service units.
- b. Legal Counsel Department
The Legal Counsel Department is responsible for providing legal assistance to the HGC in judicial and extra-judicial matters.
- c. Directorate of Planning and Operational Standards

The Directorate of Planning and Operational Standards is responsible for the drafting of the strategic plan and for monitoring whether the objectives of the strategic plan and the annual operational action plans are being achieved; it is also responsible for monitoring budget implementation, recommending new standards and inspecting compliance with such standards, as well as for conducting all kinds of internal audits.

d. Directorate of Security and Information

The Directorate of Security and Information is responsible for dealing with information and security issues in the HGC; it is also competent for the prevention and suppression of money laundering and terrorist financing.

e. Communications Office

The Communications Office is responsible for contacts and cooperation with the media; it also prepares, organizes and coordinates the implementation of the HGC communication programme.

f. The HGC Secretariat

The Secretariat of the HGC is responsible for keeping exact and true minutes of the meetings and the decisions of the HGC and for keeping the records which prove that the Internal Rules of Procedure are followed.

g. The President's Office provides the necessary support to the President to enable him to fulfill his responsibilities.

1.5.2 The General Directorate of the HGC

The following service units report directly to General Directorate of the HGC:

a. Directorate of Regulatory Frameworks, Licenses and Certifications

The Directorate of Regulatory Frameworks, Licenses and Certifications is responsible for drafting the regulations governing the operation and compliance inspection as regards all kinds of games and for issuing licenses and certifications.

b. Directorate of Market Compliance Inspection

The Directorate of Market Compliance Inspection is responsible for checking compliance of gaming operators with the legislation in force, the regulatory frameworks established by the HGC and the special terms and conditions for operating licenses. Furthermore, it follows the developments in the gaming market as a whole, so as to be able to submit proposals for a more efficient gaming market.

c. Directorate of Institutional Cooperation and Social Responsibility

The Directorate of Institutional Cooperation and Social Responsibility is responsible for establishing cooperation with statutory bodies in Greece and

abroad. Moreover, the Directorate is responsible for promoting Responsible Gaming and for planning and carrying out the necessary trainings.

d. Directorate of IT, Telecommunications and Technical Services

The Directorate of IT, Telecommunications and Technical Services is responsible for providing the necessary support to the HGC to enable fulfill its activities; with the use of computer technologies, electronic transaction tools and telecommunication networks, it develops and upgrades IT systems, maintains the HGC databases and ensures that an up-to-date technology is being used. In addition, it is responsible for the maintenance and smooth operation of the buildings and electromechanical equipment used by the HGC.

e. Directorate for Financial and Administrative Affairs

The Directorate for Financial and Administrative Affairs is responsible for planning, implementing and supporting the financial, administrative and management procedures required for the operation of the HGC. It monitors revenue and expenditure, as well as property issues; it prepares the balance sheet and the financial statements; it is deals with accounting and cash management and with procurement. Finally, it is responsible for the management of human resources.

CHAPTER 2: AN OVERVIEW OF THE GREEK GAMBLING MARKET**2.1 GAMBLING OPERATORS AND GAMES OF CHANCE**

In Greece gambling operations are currently carried out by the following entities:

- a. The Greek Organization of Football Prognostics (OPAP S.A.) operates most gambling games.
- b. Nine (9) casino enterprises, carrying out operations in various parts of the country.
- c. The Directorate of State Lotteries of the Ministry of Finance, which manages State Lotteries. It should be noted that under the agreement dated 30th July 2013 the exclusive rights were given to the company "Hellenic Lotteries S.A.". The concession agreement was ratified by the Hellenic Parliament by virtue of Law 4183/2013 (GG Series A, No. 186). The company was assigned the operation of state lotteries as of 1st May 2014.
- d. The Hellenic Horse Racing Organization S.A. ("ODIE S.A."), which is responsible for the mutual betting on horse races.
- e. The twenty-four (24) undertakings providing online gambling and betting services which are subject to the transitional regime of paragraph 12, Article 50 of Law 4002/2011.

2.1.1 The Greek Organization of Football Prognostics (OPAP S.A.)

OPAP S.A. was set up in 1958 as a public organization. In 1999 it became a public limited company under the trade name OPAP S.A. and was listed on the Athens Stock Exchange in 2000. According to ICAP, in 2008 OPAP S.A. was the most profitable undertaking in Greece.

Until October 2013, the Greek State had been holding 33% of its shares. In October 2013, OPAP S.A. was privatized with the sale of 33% of its share capital, i.e. the share belonging to the Greek State.

OPAP S.A. has the exclusive rights for a series of gambling and betting services of pre-defined or non-pre-defined yield and provides these services through a network of 4,739 agencies (source: OPAP S.A. webpage). Following its partial privatization, in 2000, it received a license, by virtue of Article 27 of Law 2843/2000 (GG Series A, 219), under which it was granted the exclusive rights to provide gaming services by a 20-year concession agreement, which was renewed in August 2011 until 2030 for all games, except for online betting.

Under the provisions and requirements of articles 39 et seq. of Law 4002/2011 (GG Series A, No. 180), as amended and in force, the company was granted a license to install and operate 35,000 gaming machines for land-based gambling (through its agencies). According to the above provisions, 16,500 of those gaming machines will be installed and operated by OPAP S.A., while the remaining 18,500 will be operated through 4 to 10 concessionaires, who will be declared the highest bidders in an international tender launched by OPAP S.A.

Nowadays, OPAP S.A. operates three numerical lottery games, the most popular being “Joker”, three numerical lottery games of pre-defined yield, the most popular being “KINO”, and three sport betting games, the most popular being “Pame Stoixima”. In particular, the games of chance operated by OPAP S.A. are:

- a. Numerical Lotteries (random number ticket games):
Kino, Super 3, Joker, Lotto and Extra 5.
- b. Football prognostics:
PROPOGOAL, PROTO, PROPO and Stoixima (Stoixima Live, Pame Stoixima).
- c. Monitor Games
Races (hound races), Powerspin (the wheel of fortune), Bowling (the result of two players), Penalties.
- d. Virtual games on terminals located at the agencies of OPAP S.A.
Go Lucky – Balloons, Go Lucky – Goal, Crazy Bingo, Flipper Drop, Ducklings, Bunzee, Fish Quest.

2.1.2 Casino enterprises

In Greece nine (9) out of the ten (10) licensed casino enterprises are currently operative and they are allowed to operate gambling games, in accordance with Law 2206/1994 (GG Series A, No. 62). Casinos are exempted from the applicable laws on trading hours and are allowed to operate throughout the year and freely determine their opening hours.

The casino premises consist of the gaming halls, i.e. the main areas where the casino gaming equipment is installed and operates, and the other accessory areas, which serve the other activities offered in the casinos (restaurants, bars, etc.).

The games played in the casinos are:

- a. Black Jack or “21”.
- b. American Roulette and French Roulette.
- c. Banco - Punto.

- d. Baccarat - Chemin de fer.
- e. American craps.
- f. Greek craps.
- g. Poker and several variations of Poker: Casino Stud Poker, 5 Card Stud, 7 Card Stud, Omaha, Texas Hold'em or Hold'em).
- h. Electronic games of chance on slot machines.
- i. Electronic Roulette.
- j. Any other game for which a license has been issued.

In January 2014, the 9 casino enterprises had four thousand and seven (4,032) employees.

As to the gaming equipment, the 9 casino enterprises have been granted a license to install 532 gambling tables and up to 5,863 gambling machines in total, while they have already installed four hundred and nine (409) tables and three thousand five hundred and sixty-six (3,566) machines in total. The gambling machines include electronic roulettes with their terminals and slot machines.

The following table provides a detailed analysis per casino enterprise:

DATA ON CASINOS											
	NAME	Gaming Equipment								Employees	
		Tables		Electronic roulettes		Terminals		Machines (slot machines)		Minimu m	Jan. 2014
		l ¹	o ²	l	o	L	o	l	o		
1	GREEK CASINO OF PARNITHA S.A.	117	61	12	2	40	38	1,500	654	400	1,018
2	REGENCY CASINO THESSALONIKI	77	74	10	0	84	0	941	912	938	874
3	THEROS INTERNATIONAL GAMING INC RIO, PATRAS	41	40	4	2	56	16	550	311	- ³	258
4	VIVERE ENTERTAINMENT S.A. THRACE	26	20	3	1	35	8	320	178	143	117
5	GREEK CASINO OF CORFU S.A.	34	16	3	2	56	16	300	91	- ⁴	47
6	AEGEAN CASINO S.A. SYROS	26	19	0	0	0	0	185	74	350	49
7	RHODES CASINO S.A.	42	40	1	1	12	12	224	221	336	265
8	CLUB HOTEL CASINO LOUTRAKI	92	82	7	2	86	35	1000	714	740	1307
9	PORTO KARRAS GRAND RESORT S.A. CHALKIDIKI	77	57	1	0	8	0	425	276	500	97
TOTALS		532	409	41	10	377	125	5.445	3.431	-	4.032

2.1.3 Directorate of State Lotteries

The Directorate of State Lotteries was established in July 1929 under the name "The Lotteries Service". By virtue of Emergency Law 339/1936 (GG Series A, No. 512) it was renamed to "Directorate of State Lotteries". It is an operational unit of the Ministry of Finance and it is therefore subject to supervision and control by the latter (P.D. 284/88). The lotteries currently in circulation are "Ethniko" (National Lottery), "Laiko" (Popular Lottery) and "Protochroniatiko" (New Year Lottery). The exclusive rights to operate the State Lotteries belong to the Greek State and the service responsible for issuing them is the Directorate of State Lotteries of the Ministry of Finance.

In July 2015, a concession agreement was concluded between the Greek State and the concessionaire under the name "Hellenic Lotteries S.A.", which granted the

¹ Columns under the heading "l": The figures provided are those laid down in the relevant operating license as amended and in force.

² Columns under the heading "o": The numbers reflect the state of affairs in the operation of casinos in January 2014.

³ The license does not prescribe the number of people to be employed by the casino.

⁴ The license does not prescribe the number of people to be employed by the casino.

latter the exclusive right to produce, operate, circulate, promote and manage the State Lotteries for a period of 12 years. The agreement was ratified by the Hellenic Parliament by virtue of Law 4183/2013 (GG Series A, No. 186).

The concessionaire will start operating the State Lotteries, i.e. "Ethniko", "Laiko", the Special State Social Solidarity Lottery (the so-called "Protochroniatiko") and the instant lottery game "Xysto", as of 1st May 2014.

2.1.4 The Hellenic Horse Racing Organization S.A. (ODIE S.A.)

According to the provisions of Emergency Law 598/1968 (GG Series A, No. 256), ODIE S.A. has the exclusive rights to organize and operate mutual horse race betting in Greece. Mutual betting on horse races is played either in the racecourse at Markopoulo or at the special horse racing betting agencies.

In 2003 ODIE S.A. was relocated to Markopoulo-Attica, where it is now based, at the new racecourse constructed for the 2004 Olympics. It also maintains a branch in Athens and it collaborates with almost 550 agencies throughout the country. Currently, the Greek State holds 100% of its shares.

Early 2013, the Greek State launched the procedure for the concession of its exclusive rights to operate mutual betting on horse races, which is still running.

2.1.5 Gambling operators subject to the provisions of paragraph 12, Article 50 of Law 4002/2011)

The licensing procedure for online gambling is described in Articles 45 et seq. of Law 4002/2011 (GG Series A, No. 180) and follows an international tender for online gaming licenses awarded to the highest bidder. No online gambling license has ever been granted to this date. Until such a license is granted, online gambling operations will continue to fall under the transitional regime of paragraph 12, Article 50 of Law 4002/2011 (GG Series A, No. 180).

The operators were placed under the transitional regime of paragraph 12, Article 50 of Law 4002/2011 (GG Series A, No. 180), as soon as it was verified that they meet the requirements laid down in the above provisions, in accordance with the procedure established by decision POL 1248/13.12.2011 of the Deputy Minister of Finance. The undertakings that are subject to this regime are available at the website of the Ministry of Finance.

<http://www.minfin.gr/portal/el/resource/contentObject/id/adce2057-71fb-4925-b094-42ca230af81f>

Under POL 1248/2011, the service which was originally responsible for the above operators was the Local Tax Office for Large Enterprises and, later on, when the latter was abolished, the relevant Local Tax Office of the Ministry of Finance which is responsible for the registered office of the company representative.

Under paragraph 12, article 5 of Law 4002/2011, the companies falling under the transitional regime are allowed to provide the gambling and betting services prescribed in the licenses they obtained from the regulatory Authorities of the EU Member States or the EEA Member States granting the license.

2.2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

2.2.1 Gambling Turnover⁵ in the period 2009-2013

In the five-year period 2009-2013, the gambling market experienced serious falls in terms of "Gambling Turnover", as shown by the yearly data in the table below.

TOTAL GAMBLING TURNOVER IN THE PERIOD 2009-2013					
TGT - (Total Gambling Turnover)					
GAMBLING SERVICE PROVIDERS	Amounts in thousands €				
	2009	2010	2011	2012	2013
OPAP S.A. ⁶	5,222,199	4,937,530	4,172,459	3,775,251	3,504,294
CASINO ENTERPRISES ⁷	2,839,588	2,585,937	2,239,463	1,890,156	1,687,605
STATE LOTTERIES ⁸	417,601	347,638	299,894	263,880	238,226
ODIE S.A. ⁹	260,095	193,433	123,462	84,388	65,022
TOTAL GAMBLING TURNOVER	8,739,483	8,064,538	6,835,278	6,013,675	5,495,147¹⁰
ONLINE GAMBLING OPERATORS ¹¹	⁻¹²	384	3,376	8,153	⁻¹³

2.2.2 Gross Gaming Revenue¹⁴ in the five-year period 2004-2008

⁵ "Gambling turnover" is the total amount of money gambled by players.

⁶ The turnover of OPAP S.A. was taken from the Annual Financial Reports of OPAP and from the financial newsletters.

⁷ The turnover of casinos is the money that players turn into drops and refers to the nine casino enterprises of Greece. The data for the years 2009-2012 was provided by the Ministry of Tourism-Directorate of Casino Supervision, while that for the year 2013 was given by the HGC services.

⁸ The turnover for the years 2009-2012 was taken from the annual financial statements of the Directorate of State Lotteries. The turnover for the year 2013 is an estimate, as the official annual report has not been finalized yet.

⁹ The turnover of ODIE S.A. for the years 2009-12 was taken from the annual financial statements. The turnover for the year 2013 is an estimate, as the official annual report has not been finalized yet.

¹⁰ The Total Gambling Turnover for the year 2013 is included in the relevant estimates.

¹¹ The data was derived from the tax returns of the 24 companies which provide online gambling services and are subject to the transitional regime of paragraph 12, article 50 of Law 4002/2011 (GG Series A, No. 180).

¹² In 2009 the companies providing online gambling services did not file a tax return.

¹³ There is no available data for the year 2013 yet.

The regulated gambling market in Greece marked a steady increase on a year-on-year basis in the period 2004-2008. In particular, in 2008, the total volume of the market (OPAP S.A., Casinos, ODIE S.A. and State Lotteries) in terms of "Gross Gambling Revenue" or GGR went up to 2,827,400¹⁵ thousand €, from 2,023,500 thousand € in 2004. The total increase of Gross Gambling Revenue in this five-year period was 40%.

2.2.3 Gross Gaming Revenue in the five-year period 2009-2013

In the five-year period 2009-2013, the gambling market experienced serious falls in terms of "Gross Gambling Revenue" (gross profit) or GGR, as shown by the yearly data provided in the table below.

GROSS GAMING REVENUE IN THE PERIOD 2009-2013					
GGR (Gross Gaming Revenue)					
GAMBLING SERVICE PROVIDERS	Amounts in thousands €				
	2009	2010	2011	2012	2013
OPAP S.A. ¹⁶	1,705,200	1,582,854	1,348,933	1,235,082	1,150,146
CASINO ENTERPRISES ¹⁷	626,074	513,435	419,720	330,169	298,665
DIRECTORATE OF STATE LOTTERIES ¹⁸	156,536	128,486	111,385	97,509	90,898
ODIE S.A. ¹⁹	52,113	39,236	27,429	20,287	15,816
TOTAL GROSS GAMING REVENUE (GGR)	2,539,923	2,264,011	1,907,467	1,683,047	1,555,525²⁰
ONLINE GAMBLING OPERATORS ²¹	²²	64	282	1,978	²³

It should be noted that the above table does not provide any sum of the gross gaming revenue (GGR) of online gambling operators (i.e. the 24 companies subject

¹⁴ Gross Gaming Revenue (gross profit) or (GGR) is equal to Total Gambling Turnover less the winners' gains.

¹⁵ Source: Deutsche Bank/ H2 Gambling Capital, which is included in a study of KPMG Consultants S.A. in 2011 "The effect of gambling tax policies".

¹⁶ The gross gaming revenue (GGR) of OPAP S.A. was taken from the Annual Financial Reports of OPAP and from the financial newsletters.

¹⁷ The gross gaming revenue (GGR) of casinos refers to all 9 casino enterprises in Greece. The data for the years 2009-2012 was provided by the Ministry of Tourism-Directorate of Casino Supervision, while that for the year 2013 was given by the HGC services.

¹⁸ The data was taken from the Annual Financial Statements of the Directorate of State Lotteries. The gross revenue for the year 2013 is an estimate, as the official annual report has not been finalized yet.

¹⁹ The gross gaming revenue (GGR) for the years 2009-2012 was taken from the annual financial statements of ODIE S.A., while that for the year 2013 is an estimate that was provided by its services, as the official annual report for 2013 has not been finalized yet.

²⁰ The Total Gross Gambling Revenue for the year 2013 is included in the ad hoc estimates.

²¹ The data was derived from the tax returns of the companies which provide online gambling services and are subject to the transitional regime of paragraph 12, article 50 of Law 4002/2011 (GG Series A, No. 180).

²² In 2009 the companies providing online gambling services did not file a tax return.

²³ There is no available data for the year 2013 yet.

to the transitional regime), as there is no data available for the years 2009 and 2013.

2.2.4 Conclusions from the overview of the gambling market

The data presented above indicates that the turnover of the regulated gambling market in Greece has dropped by 37.1% in the last five years (2009-2013). Gross revenue has also suffered a drop by 38.8%, whereas it had seen an equivalent increase, in the five-year period 2004-2008. Consequently, the regulated gambling market is almost at the same level as in 2004, both in terms of total turnover and of gross revenue. This is also reflected in the following table:

COMPARATIVE TABLE OF TOTAL GAMBLING TURNOVER (TGT) AND GROSS GAMING REVENUE (GGR) IN THE PERIOD BETWEEN 2009 AND 2013						
GAMBLING SERVICE PROVIDERS	Amounts in thousands €					
	TOTAL GAMBLING TURNOVER TGT		GROSS GAMING REVENUE GGR		TGT RATE OF CHANGE	GGR RATE OF CHANGE
	2009	2013	2009	2013	2013/2009	2013/2009
OPAP S.A.	5,222,199	3,504,294	1,705,200	1,150,146	-32.9%	-32.6%
CASINO ENTERPRISES	2,839,588	1,687,605	626,074	298,665	-40.5%	-52.3%
STATE LOTTERIES	417,601	238,226 ²⁴	156,536	90,898	-42.9%	-41.9%
ODIE S.A.	260,095	65,022 ²⁵	52,113	15,816	-75.0%	-69.6%
TOTALS	8,739,483	5,495,147	2,539,923	1,555,525	-37.1%	-38.8%

It should be noted that the above table does not provide any sum or any financial data on the online gambling operators, to avoid erroneous conclusions, since there is not enough data available for the years in question.

Finally, it is worth noting that, although 2010 was a difficult year, due to the economic downturn that the market and households had to face as a result of the crisis, the gambling market of Greece was ranked 6th largest in the European

²⁴ The turnover of the Directorate of State Lotteries for the year 2013 is an estimate, as the official annual report has not been finalized yet.

²⁵ The turnover of ODIE S.A. for the year 2013 is an estimate that was provided by its services.

Union (with a gross gambling revenue of 2.5 bn euros, online operations included)²⁶.

²⁶ The data was taken from H2 Gambling Capital, Greece (30/09/2011), which is included in a survey on the VLT market in Greece, carried out by the New Games Development Directorate of OPAP S.A.

CHAPTER 3: ANNUAL ACTIVITY REPORT ON GAMING REGULATION

The annual activity report in this field is presented in conjunction with the projects of the approved Action Plan 2013-2015.

The projects in this field were carried out by the Directorate of Regulatory Frameworks, Licenses and Certifications.

3.1 REGULATION OF AMUSEMENT GAMES PLAYED ON GAMING MACHINES**3.1.1 Drafting a Regulation on the operation and compliance inspection of amusement games**

The project "Drafting a Regulation on the operation and compliance inspection of amusement games played on gaming machines" (project: 1.1. of the approved Action Plan) was completed according to the plan. The Regulation will enter into force in the 2nd quarter of 2014.

3.1.2 Operating licenses for electronic amusement games

The project "Operating licenses for electronic amusement games" (project: 2.1 of the approved Action Plan) will start as soon as the "Regulation on the operation and compliance inspection of amusement games played on gaming machines" enters into force. The project is ongoing and is expected to be running until conclusion of the Action Plan 2013-2015.

3.1.3 Certification of electronic amusement games

The following projects of the approved Action Plan

- a. Project 3.1: "Certification of electronic amusement games",
- b. Project 3.5: "Certification of gaming machines used for electronic amusement games",
- c. Project 3.7: Certification of premises operating electronic amusement games",
- d. Project 3.11: "Certification of technicians of electronic amusement games",

will start as soon as the "Regulation on the operation and compliance inspection of amusement games played on gaming machines" enters into force. The projects are ongoing and are expected to be running until conclusion of the Action Plan 2013-2015.

3.2 REGULATION OF VLT GAMBLING**3.2.1 Drafting a Regulation on the operation and compliance inspection of games of chance played on VLT gaming machines**

The project "Drafting a Regulation on the operation and compliance inspection of games of chance played on VLT gaming machines" (project: 1.4. of the approved Action Plan) was completed according to the plan. As part of this project, in 2013, the HGC approved (Decision No. 38/2/10.1.2013) the draft Regulation on the operation and compliance inspection of games of chance played on VLT gaming machines, in the form that it took following the public consultation, and communicated the draft to the European Commission in accordance with the procedure provided for in Directive 98/34/EC (Notification No 2013/24/GR).

The European Commission submitted a detailed opinion on mutual recognition and on the obligations of manufacturers and importers and a comment on the specifications for the casing of gaming machines. This prolonged the standstill period by three months, i.e. until 12.07.2013. The HGC provided the Commission with clarification and answers as to the detailed opinion and the comments it had submitted on the above notification (2013/24/GR) and the similar comments on the preceding notification of the technical specifications (2012/205/GR). (excerpts of Minutes No. 72/2/24.9.2013). The EC found the answers to be adequate (December 2013). However, the Regulation cannot be published until the provisions in force are amended by the legislative regulations, which proved to be necessary during examination of the Regulation and have been proposed by the HGC.

3.2.2 Certification for the regulation of VTL gambling.

The following projects of the approved Action Plan:

- a. Project 3.2: "Certification of games of chance played on VLT gaming machines",
- b. Project 3.6: "Certification of VLT gaming machines",
- c. Project 3.8: "Certification of premises operating games of chance played on VLT gaming machines",
- d. Project 3.9: "Certification of manufacturers of games of chance and VLT gaming machines",
- e. Project 3.10: "Certification of importers of games of chance and VLT gaming machines",
- f. Project 3.12: "Certification of technicians of games of chance and VLT gaming machines",

will start as soon as the "Regulation on the operation and compliance inspection of games of chance played on VLT gaming machines" enters into force. The projects are ongoing and are expected to be running until conclusion of the Action Plan 2013-2015.

3.2.3 Preparation of a Study on the estimation of the level of fees and charges for the operation of games of chance played on VLT gaming machines

For the above-named project (project: 3.13. of the approved Action Plan), a study was undertaken, titled: "Cost of certifications required for the operation of games of chance played on VLT gaming machines".

In particular:

According to paragraph 10, article 50 of Law 4002/2011 (GG Series A, No. 180), the fees and charges imposed on VLT gambling operators are defined by decision of the Minister of Finance, which is issued following a recommendation by the HGC and in line with the relevant cost-benefit analysis. On the basis of this obligation, the HGC assigned experienced economists, who are part of its staff and members of the Economic Chamber of Greece, to prepare a study on the estimation of the level of Fees and Charges for the operation of games of chance played on VLT gaming machines.

The main objective of the study is to determine the amount of the fees and charges defined by law for the certification of games of chance played on VLT gaming machines (Video Lottery Terminal).

The study was based on estimates of the operational costs of the HGC, on the draft Regulation, which has formulated the procedures for receiving applications and issuing certifications, as well as on assumptions about actions taken during compliance inspections.

The study was completed and delivered to the HGC on 13th March 2013 which approved it by Decision No. 45/3/20.03.2013. Following this, the HGC recommended to the Ministry of Finance to issue the relevant decision defining the relevant fees and charges, in parallel with the approval of the Regulation on the operation and compliance inspection of games of chance played on VLT gaming machines.

3.3 REGULATION OF ONLINE GAMBLING

3.3.1 Drafting a Regulation on the operation and compliance inspection of online gambling

The project titled "Drafting a Regulation on the operation and compliance inspection of online gambling" (project: 1.3 of the approved Action Plan), started in the 3rd quarter of 2013 by recording the experience and the relevant regulatory frameworks of other countries and is expected to be completed in the 2nd quarter of 2014.

3.3.2 Checking the legality of operation of the companies falling under the transitional regime of paragraph 12, article 50 of Law 4002/2011

The legality check of the operation of the companies providing online gambling started in the 2nd quarter of 2012 and was completed in the end of 2013. This project (1.17) is new and it was not originally included in the 2013 Operation Plan.

In accordance with its responsibilities, which derive from the provisions of items (a) and (i), paragraph 3, article 28 of Law 4002/2011 (GG Series A, No. 180), and in view of the fact that it was preparing to take over its duties on online gambling, the HGC sought to set up a register of the companies falling under the transitional regime provided for in paragraph 12, article 50, Law 4002/2011.

By virtue of its Decision No. 40/4/21.01.2013, the HGC transmitted the documents and the data collected until that time to the Local Tax Office for Large Enterprises, which was responsible for monitoring and inspecting such companies. Having assumed its responsibilities to impose penalties against unauthorized online gambling, by virtue of Decision 50/4/24.04.2013, and in view of the publication of a black list of all unauthorized online gambling operators, the HGC completed the examination of data concerning the companies falling under the transitional regime in cooperation with the responsible foreign regulatory Authorities, and sent the final conclusions to the competent authorities of the Ministry of Finance.

3.4 REGULATION OF GAMES OF CHANCE OPERATED BY OPAP S.A.

3.4.1 Drafting regulations on the operation and compliance inspection of games operated by OPAP S.A.

The project "Drafting regulations on the operation and compliance inspection of games operated by OPAP S.A." (Project: 1.5 of the approved Action Plan), was scheduled to start in the 3rd quarter of 2013 and be completed within the 2nd quarter of 2014, with the submission of the recommendations of OPAP S.A. Given that the final deadline for the sale of the shares in OPAP S.A held by the Greek State and the changes such sale would bring to the company's Management (October 2013), the project was postponed and will be completed in the 2nd

quarter of 2015. It should be noted that until the new regulations on the operation and compliance inspection are issued, the current regulations remain in force, in the form stipulated by the ministerial decisions issued when they were originally introduced.

3.5 REGULATION OF MUTUAL HORSE RACE BETTING

3.5.1 Drafting a Regulation on the operation and compliance inspection of mutual horse race betting

The project "Drafting a Regulation on the operation and compliance inspection of mutual horse race betting" (project: 1.6 of the approved Action Plan), started in the 1st quarter of 2013 and is expected to be completed in the 2nd quarter of 2014.

As part of this project, in 2013, the HGC approved by virtue of Decision No. 57/2/17.06.2013 the draft Regulation on the operation and compliance inspection of mutual betting on horse races and launched a public consultation through the Open Government website (www.opengov.gr). No comments were submitted during the public consultation, which took place between 20.06.2013 and 01.07.2013. On the contrary, only the companies that participate in the tender process for the privatization of these rights submitted their comments directly to the HGC.

After evaluating the comments submitted, the HGC approved (Decision No. 70/2/12.09.2013) the notification of the final draft Regulation to the European Commission, in accordance with the procedure provided for in Directive 98/34/EC (notification code No 2013/530/GR). The stand-still period expired on 18/12/2013 without any further extension. The EC and Malta made some comments on the draft, mainly on commercial communication issues.

3.6 REGULATION OF GAMING THROUGH STATE LOTTERIES

3.6.1 Drafting a General Regulation and Special Regulations on the State Lotteries

The drafting of the "Regulation on the operation and compliance inspection of the State Lotteries game" (project: 1.7 of the Approved Action Plan), was completed in 2012 and approved by Decision No 14/2/17.7.2012 (GG Series B, No 2205) of the HGC. Four (4) new projects for the "Drafting of Special Regulations on State Lotteries" fall under this project.

In 2013, a series of working meetings with executives from the company "Hellenic Lotteries S.A." were conducted in the context of the above projects, so that clarification and guidelines are provided for the preparation of the draft Special Regulations on State Lotteries, which are proposed by the operator (Hellenic

Lotteries S.A.) to the HGC, in accordance with the "General Regulation on the operation and compliance inspection of gambling through State Lotteries".

Late 2013, the concessionaire "Hellenic Lotteries S.A." submitted to the HGC the first draft special regulation on the instant lottery game "Xysto". The HGC will work on the draft and is expected to approve it in the first quarter of 2014.

The draft Special Regulations on "Ethniko" and "Laiko" Lotteries are expected to be submitted by the Operator in the 1st quarter of 2014 and be completed, after the necessary processing by the HGC, in the 2nd quarter of 2014.

The draft Special Regulation on the Special Social Solidarity Lottery (the so-called "Protochroniatiko") will be submitted by the Operator in the 2nd quarter of 2014 and will be completed, after it has been processed by the HGC, in the 3rd quarter of 2014.

3.7 REGULATION OF GAMBLING ON BROADCAST MEDIA

3.7.1 Drafting a Regulation on the operation and compliance inspection of gambling on broadcast media

Licenses for gambling on broadcast media were possible on the basis of article 53, Law 4002/2011. The HGC, which took up duties in 2012, is legally responsible for the licensing of the above games with the consent of the NCRTV (the Greek National Council for Radio and Television).

On the basis of the project "Drafting a Regulation on the operation and compliance inspection of gambling on broadcast media" (project: 1.8 of the Approved Action Plan) and following its Decision No 47/2/10.04.2013 (GG Series B, No 901), the HGC took over the above responsibilities in 2013 and started drafting the regulation on the provision of licenses by the committee that was set up jointly with the NCRTV. While in the process of drafting the Regulation, the HGC realized that article 53, Law 4002/2011 was problematic. It was general and vague, it did not determine which games could be licensed and, as a consequence, there was a legal gap and lack of legal certainty. Moreover, the international survey conducted showed that such games are rarely regulated in other countries and the know-how available in this field is insufficient.

Article 106 of Law 4209 (GG Series A, No 253) reformed and completed the legal framework so as to describe the games that could be licensed, as well as all the necessary details of licensing. The games that can be licensed are mixed games which consist of one phase of mental skills and of maximum one phase of chance. Thus, broadcast media are not allowed to provide games of pure chance, such as casino games, Stoixima or other games of chance which are understood as gambling.

The new legal framework allowed this type of gambling as an immediate measure for a transitional period until the Regulation on licensing is issued, as long as the gambling service providers accept the operation principles and rules set by the HGC. As a result, the HGC drafted the General Principles and Rules on the Operation of Gambling on Broadcast Media and launched a public consultation on 20th December 2013, which was completed on 10/01/2014. The evaluation of the comments submitted during the public consultation and the approval of the draft General Principles and Rules on the Operation of Gambling on Broadcast Media will take place in the 1st quarter of 2014. Subsequently, the final Regulation will be prepared so that the licenses can be granted.

3.7.2 Issuance of Operating licenses for Gambling on Broadcast Media

The project "Issuance of operating licenses for Gambling on Broadcast Media"(project: 2.3 of the approved Action Plan), will start once the Regulation has been approved and published, in the 2nd quarter of 2015. The project is ongoing and is expected to be running until conclusion of the Action Plan 2013-2015.

3.7.3 Characterization of games played on broadcast or other media as games that involve or do not involve chance

In the project "Characterization of games played on broadcast or other media as games that involve or do not involve chance", (project: 3.4 of the approved Action Plan), thirteen (13) decisions were issued in 2013 to characterize various games played on broadcast media as games that involve or do not involve chance. The project is ongoing and is expected to be running until conclusion of the Action Plan 2013-2015.

3.8 REGULATION OF CASINO GAMBLING

Following article 92 of Law 4182/2013 (GG Series A, No. 185), on 10 September 2013 the HGC took over all the responsibilities of the Directorate of Casino Supervision of the Ministry of Tourism and of the Casino Commission of Law 2206/1994 (GG Series A, No. 62), with the exception of the control and supervision of offsets provided by casinos under a contractual agreement. As soon as the HGC assumed these responsibilities, it took over the archives of the Casino Commission and of the Directorate of Casino Supervision of the Ministry of Tourism (330 boxes of archives for the period 2000-2013). The following projects were carried out in the 4th quarter of 2013 for the regulation of the operation of casino gambling.

3.8.1 Drafting a new Regulation on the operation and compliance inspection of casino gaming

As part of the project "Drafting a new Regulation on the operation and compliance inspection of casino gaming" (project: 1.9 of the approved Action Plan) and since it was deemed necessary to bring up-to-date the legal framework in force, the following actions were taken:

By virtue of Decision No. 85/8/16-12-2013 (GG Series B, No. 3353) of the HGC, the obligation of casinos to obtain the approval of the supervisory Authority in order to perform minor changes in relation to various aspects of their operation was replaced by the procedure of early notification of such changes to the authority.

By virtue of Decision No. 74/3/1-11-2013 (GG Series B, No. 2945) the responsibilities conferred on the HGC by Joint Ministerial Decision No. 1036/1995 (GG Series B, No. 549) as regards the approval of the Certificate of Suitability of casino employees and the regulation of issues related to the operating hours were delegated to the President of the HGC. Once Decision No 74/3/1-11-2013 (GG Series B, No. 2945) entered into force, the HGC issued forty (40) Certificates of Suitability for casino employee, after having checked the relevant supporting documents. The existing regulation will be further improved in 2014, with a view to simplifying the processes.

3.8.2 Certification of casino gambling and gaming machines

As soon as it took over the supervision of the operation of casinos, the HGC was faced with dozens of pending applications, as well as a constant flow of new applications for suitability licenses for technical equipment and materials for the operation of casino gambling. Therefore, it was clear that the evaluation reports of the independent testing agencies and the accompanying documents needed to be recast in order to expressly meet the technical requirements set out in the Greek regulatory framework.

Based on the above, the project "Certification of casino gambling and gaming machines" (project: 3.3 of the approved Action Plan) started in the 3rd quarter of 2013, is ongoing and is expected to be running until conclusion of the Action Plan 2013-2015. The following actions were taken as part of the project:

Decision No. 86/8/19-12-2013 of the HGC approved a model certificate of compliance of the technical equipment with the technical requirements and specifications laid down in the Regulation on the Administrative Control and Supervision of the Operation of Casinos, which should be appended to the evaluation reports they issue so that they can be accepted by the HGC. All agencies were required to confirm they fulfill the specifications for being characterized as independent testing agencies, such as the legality of their operation, accreditations, legal representation etc., so that their reports can be accepted. The same procedure will be followed for any other testing agency that the interested parties may choose, so that their certification can be used in order to obtain suitability licenses for the technical equipment and materials used in the casinos.

As a result, the HGC is expected to provide certifications for suitability licenses for technical equipment in 2014.

3.8.3 Other regulations for the operation of casinos (amendments of operating licenses and approvals of changes)

In order to ensure the proper functioning of casinos, the HGC examined all the relevant applications and issued seventeen (17) decisions on the rearrangement of casino gambling rooms, removal of technical equipment and installation of new one, modification of operating hours and transfer of amounts due to modification or interruptions of progressive functions (jackpots).

3.9 REGULATION OF GAMING PENALTIES

3.9.1 Drafting a Regulation on Gaming Penalties

The project "Drafting a Regulation on Gaming Penalties" (project: 1.11 of the approved Action plan) will be completed in 2014. In this project, the HGC issued a draft decision to regulate sanctions in cases of unauthorized provision of online gambling services. The draft was notified to the European Commission, in accordance with the procedure provided for in Directive 98/34/EC (notification No 2012/710/GR). The European Commission submitted comments on the draft and the Regulatory Authority of Malta submitted a detailed opinion and comments, hence prolonging the standstill period by a month, until 19/04/2013. Then, the HGC expressed its opinion on the detailed opinion and the comments (Decision No. 48/02/12.04.2013), which was submitted to the Ministry of Finance in order to be included in the overall response of the Greek Authorities to the detailed opinion of the Regulatory Authority of Malta that raised more general issues on the national policies of Greece on gambling.

Finally, Decision No. 51/3/26.04.2013 (GG Series B, No. 1147) of the HGC amended and codified Decision No. 23/3/23.10.2012 (GG Series B, No. 2952), titled "Regulation of certain matters governed by the Regulation on the operation and compliance inspection of Gaming as regards the imposition of administrative penalties, imposed where games of chance are provided online without the requisite license".

3.10 REGULATION OF COMMERCIAL COMMUNICATIONS IN GAMING

3.10.1 Drafting a Regulation on Commercial Communications

As part of the project "Drafting a Regulation on Commercial Communications" (project: 1.12 of the approved Action Plan) a draft Regulation on Commercial Communications was prepared and is in the stage of approval by the HGC. The draft Regulation defines the framework of principles for Responsible Advertising which gambling operators should adopt and apply so that their communication

activities cause the least negative effects that can be caused to the public, and especially to vulnerable social groups, by their participation in gambling.

CHAPTER 4: ANNUAL ACTIVITY REPORT ON COMPLIANCE INSPECTION PROCEDURES IN THE GAMING MARKET

The annual activity report in the field of compliance inspection procedures in the gaming market is presented per game, game group or gaming operator, in conjunction with the projects of the approved Action Plan 2013-2015.

The projects in this field were carried out by the Directorate of Market Compliance Inspection.

4.1 COMPLIANCE INSPECTION PROCEDURES FOR AMUSEMENT GAMES**4.1.1 Drafting a Manual on Compliance Inspection Procedures for amusement games played on gaming machines**

The project "Drafting a Manual on Compliance Inspection Procedures for amusement games played on gaming machines" (project: 4.1 of the approved Action Plan) started in September 2013.

In 2013, in the context of this project, a draft manual on compliance inspection procedures for amusement games played on gaming machines was prepared based on the preliminary draft regulation on the operation of such games, which recorded possible compliance inspection points for amusement games played on gaming machines.

The project is estimated to be completed in the 2nd quarter of 2014.

4.1.2 Compliance inspection of amusement games played on gaming machines

The project "Compliance inspection of amusement games played on gaming machines" (project: 4.17 of the approved Action Plan) will start in the 2nd quarter of 2014 and will be divided in the stages of "Training of Inspectors" and "Pilot Compliance inspections". Compliance inspections are planned for the 3rd quarter of 2014, after the regulation on the operation of such games has been completed and put into force.

4.1.3 Drafting a Manual on Compliance Inspection of online amusement games

The project titled "Drafting a Manual on Compliance Inspection of online amusement games" (project: 4.24) was not originally included in the approved Action Plan. The project started in December 2013.

In the context of this project, data started being collected in 2013, so that a draft manual on compliance inspection procedures for online amusement games, which would record possible compliance inspection points, is prepared.

The project is estimated to be completed in the 2nd quarter of 2014.

4.1.4 Compliance inspection of online amusement games

The project titled "Compliance inspection of online amusement games" (project: 4.19 of the approved Action Plan) will start in the 4th quarter of 2014 and will be divided in the stages of "Training of Inspectors" and "Pilot Compliance Inspections". Compliance inspections will start in 2015.

The project is ongoing and is expected to be running until conclusion of the Action Plan 2013-2015.

4.2 COMPLIANCE INSPECTION OF GAMES OF CHANCE PLAYED ON VLT GAMING MACHINES**4.2.1 Drafting a Manual on Compliance Inspection of games of chance played on VLT gaming machines**

The project "Drafting a manual on compliance inspection procedures for games of chance played on VLT gaming machines" (project: 4.3 of the approved Action Plan) started in September 2013.

As part of this project, a draft manual on Compliance Inspection procedures for games of chance played on VLT gaming machines was drawn up, which recorded possible compliance inspection points for games of chance played on VLT gaming machines.

The project is estimated to be completed in the 2nd quarter of 2014.

4.2.2 Compliance Inspection of games of chance played on VLT gaming machines

The project "Compliance Inspection of games of chance played on VLT gaming machines" (project: 4.15 of the Approved Plan) was scheduled to start in the 3rd quarter of 2013. Given the fact that no gaming machines were installed in 2013, no compliance inspections were conducted in 2013.

The project will start in the 2nd quarter of 2014 and will be divided in the stages of "Training of Inspectors" and "Pilot Compliance Inspections". Compliance inspections will start in the 3rd quarter of 2014 (provided that VLT gaming machines have been installed in the certified businesses).

The project is ongoing and is expected to be running until conclusion of the Action Plan 2013-2015.

4.3 COMPLIANCE INSPECTION OF GAMES OF CHANCE OPERATED BY OPAP S.A.

On the basis of the 2014 Operational Plan, the Manuals on Compliance Inspection procedures for OPAP S.A. will further specify the detailed elements of Compliance Inspection of gaming operators and retailers, on the one hand, and of compliance inspection procedures for each game or game category, on the other hand. Due to

the different nature of the games operated by OPAP S.A., different compliance procedures are required depending on the category of the game.

The project "Drafting a manual on compliance inspection procedures for OPAP S.A. and retailers" was not originally included in the approved Action Plan, due to the fact that the HGC took over this responsibility in 2013. The project started in the same year by recording compliance inspection points and will be completed in the 2nd quarter of 2014.

The project 4.5 "Drafting manuals on compliance inspection procedures for games of chance operated by OPAP S.A." will be completed in the 4th quarter of 2014.

Compliance inspections (project: 4.11 of the approved Action Plan), will start once the first manual has been completed in the 3rd quarter of 2014. The project is ongoing and is expected to be running until conclusion of the Action Plan 2013-2015.

4.4 COMPLIANCE INSPECTION OF MUTUAL HORSE RACE BETTING

A public consultation was launched on 18/12/2013 on the Regulation on the Operation of mutual betting on horse races. The project "Drafting a Manual on Compliance Inspection Procedures for mutual betting on horse races" (part of the project: 4.4 of the approved Action Plan) will start upon finalization of the regulation.

In the context of this project, data regarding the operation of mutual betting on horse races started being collected in 2013.

Upon conclusion of this project, the project "Compliance Inspection of mutual horse race betting" (project: 4.13 of the approved Action Plan) will start.

4.5 COMPLIANCE INSPECTION OF LOTTERY GAMES

The manuals on compliance inspection of lottery games will focus on the compliance inspection procedures followed for the operators and retailers, on the one hand, and on the compliance inspection of each lottery on the other hand.

The project 4.22 "Drafting a Manual on Compliance Inspection Procedures for the company "Hellenic Lotteries S.A" and lottery retailers" was not originally included in the 2013 Operational Plan. This is a new project which started in 2013, with the recording of lottery retailers, and is expected to be completed in the 2nd quarter of 2014.

The project 4.23 "Drafting a Manual on Compliance Inspection Procedures for state lotteries" describes the compliance inspection procedures per lottery type; it is expected to be completed in the 4th quarter of 2014.

Compliance inspections (project: 4.12 of the approved Action Plan) will start in the 2nd quarter of 2014. The project is ongoing and is expected to be running until conclusion of the Action Plan 2013-2015.

4.6 COMPLIANCE INSPECTION OF CASINO GAMBLING

4.6.1 Drafting a Manual on Compliance Inspection of Casino Gambling

As soon as the HGC took over the supervision and compliance inspection of the operation of casinos, in September 2013, it was deemed necessary that the compliance framework provided for in Ministerial Decision T/6736/2003 (GG Series B, No. 929) should be kept in force at this initial stage. The inspection of casino gambling is being conducted by teams of authorized officers of the HGC, on the basis of article 29 of the above decision.

In the short time period that the HGC has been exercising its responsibilities in this field, certain parts of the current regulation, which need to be updated, were highlighted and it was decided that they should be amended in order to make the compliance inspection mechanism more effective.

As a result, the project "Drafting a manual on compliance inspection procedures for casino gambling" (project: 4.6 of the approved Action Plan) started and is under way with the aim to bring up-to-date the existing framework.

4.6.2 Compliance Inspection of casino gambling

The project "Compliance Inspection of casino gambling" (project: 4.14 of the Approved Plan) started in the 3rd quarter of 2013. The project is ongoing and is expected to be running until conclusion of the Action Plan 2013-2015.

In 2013 the following actions were taken as part of the project:

- a. Inspection teams, which consisted of 33 authorized officers of the HGC, carried out daily on-site inspections/ visits in the 9 casinos that operate in the country on a 24h basis, following Ministerial Decision T/6736/2003 (GG Series B, No. 929).
- b. The authorized officers prepared and submitted daily and monthly inspection reports on the nine (9) casinos with reference to all inspection points (62 points), in accordance with the provisions set out in the existing regulation.
- c. Customer complaints and questions about the operation of casino enterprises and casino gambling operated by these enterprises were handled.
- d. The financial obligations of casinos towards the Greek State, the local authorities, the Greek National Tourism Organization (GNTO) and Hellenic Festival S.A. were audited and the current state of outstanding financial obligations towards the above entities was assessed.
- e. Regular monthly audits were conducted on the earnings of casinos and the

interested bodies (the Greek State, six (6) Local Tax Offices, ten (10) municipalities, the GNT0 and the Hellenic Festival S.A.) were informed about their rights on such earnings.

- f. Decisions were taken concerning the outstanding financial obligations of five (5) casino enterprises towards the Greek State, local authorities, the GNT0 and the Hellenic Festival S.A.

4.6.3 Other activities in the field of compliance inspection of casino gambling

As soon as it took over the supervision and compliance inspection of the operation of casinos, in September 2013, the following actions were taken:

- a. Cooperation with the Ministry of Tourism for a smooth transfer of the responsibilities on the operation of casinos to the HGC, as to financial management, administration and human resources.
- b. Reception and updating of the officers seconded from the former Directorate of Casino Supervision of the Ministry of Tourism, as well as further strengthening of the inspection mechanism with the secondment of employees from other bodies to the inspection teams.
- c. Classification of the archival material delivered by the Ministry of Tourism per topic (daily and monthly financial newsletters, certificates of suitability of employees, official travels, complaints, certificates of revenues, audits of reserves, electronic records of financial data, audiovisual incident recordings, details of non-scheduled inspections, etc).
- d. Evaluation and transfer of the electronic records to an Access database including the monthly data sent by casinos in the period 2003-2013.
- e. Management of issues which had been handled by the authorized casino inspectors of the HGC who have been suspended from their duties on the basis of the provisions on the mobility of public sector employees.
- f. Drafting technical specifications and development of a computer application - which in the final stage - for daily online recording of the financial data of casino enterprises by the authorized inspectors of the HGC, as well as electronic cross-checking of such data.
- g. The necessary administrative and financial management of inspection teams per casino, on a monthly basis (inspection procedure, working hours, leaves, travel and accommodation costs, overtime, etc.).
- h. 24h response to urgent matters arising in the casinos.

4.7 COMPLIANCE INSPECTION OF ONLINE GAMBLING

4.7.1 Drafting a Manual on Compliance Inspection of online gambling

The Regulation on Compliance Inspection of unauthorized online gambling was issued on 13 May 2013. Following the above, several compliance inspections were carried out for the drafting of the HGC Black List along with some complementary compliance inspections, mainly in order to cross-check initial compliance inspection results.

The project "Drafting a Manual on Compliance Inspection Procedures for Online Gambling" (project: 4.2 of the approved Action Plan), was scheduled to start in the 2nd quarter of 2013 and be completed in the 1st quarter of 2014. The project started in September 2013 and will be concluded in the 2nd quarter of 2014.

In this project, a Manual on Compliance Inspection Procedures for online gambling was drafted, concerning:

- a. gambling service providers falling under the transitional regime of paragraph 12, article 50 of Law 4002/2001).
- b. unauthorized gambling service providers,
- c. ISP providers,
- d. credit institutions,
- e. online players of games of chance.

Additionally, a schedule of compliance inspections and the procedures for their execution was drafted.

4.7.2 Compliance Inspection of online gambling

The project "Compliance Inspection of online gambling" (project: 4.10 of the approved Action Plan), was scheduled to start in the 2nd quarter of 2013. However, the preliminary investigation on the Internet, in order to track websites offering online gambling services in the Greek territory, was initiated in January 2013. The project is ongoing and is expected to be running until conclusion of the Action Plan 2013-2015.

In 2013 the following actions were taken as part of the project:

- a. In January 2013, the investigation that was conducted on the Internet to track websites offering online gambling services in the Greek territory was completed. The investigation revealed 618 websites of this kind. In March 2013, evidence on 482 websites (which were suspected of offering online gambling services) was sent to the Public Prosecutor's Office at the Court of First Instance of Athens and the Cybercrime Unit, so as to investigate whether any illegal actions had been committed.

- b. Decision No. 51/3/26-4-2013 of the HGC on the regulation of issues related to the Regulation on the operation of online gambling (regulation on gaming sanctions), created the necessary infrastructure (processes and appropriate IT applications), in order for the competent inspection teams of the HGC to conduct a more thorough examination on the Internet.
- c. The inspection teams checked 500 websites identified as online gambling service providers in the Greek territory, so as to verify whether the services they provided were authorized or unauthorized and allow the HGC to draw up a black list and enforce the applicable administrative penalties.
- d. In July 2013, the first round of compliance inspections was completed and the first official black list of unauthorized online gambling providers was issued following a decision of the HGC. The list included 401 websites and was uploaded on HGC webpage.
- e. Subsequently, 221 registered letters were sent to inform ISP providers, police and court authorities and the credit and payment institutions which legally operate in Greece that a black list had been issued by HGC and they were invited to take the actions laid down in the law.
- f. In August 2013, new inspection teams were formed to conduct additional compliance inspections on the websites providing online gambling.
- g. In the period September-November 2013, the additional online compliance inspections were completed and the black list was updated. 58 additional compliance inspections were carried out on websites which were tracked down following information and/or complaints coming from online gambling providers and consumers. The black list was updated as soon as the above compliance inspections were completed and it now included 424 websites.
- h. As a result, 157 additional registered letters were sent to inform ISP providers, police and court authorities and the credit and payment institutions which legally operate in Greece, about the updated black list, so that they can take all the necessary actions laid down in the law.
- i. A meeting with ISP providers, which were represented by officers from their legal and technical departments, took place in order to address issues arising upon law implementation and to coordinate actions.

Moreover, the following actions were taken:

- a. Communication, through letters and emails, with a large number of ISP providers, on issues related to the black list.
- b. Communication, through letters, emails or extrajudicial documents, with online gambling providers regarding their entry in the black list.
- c. Communication, through letters, emails or phone calls with the Greek Police Authorities, the Hellenic Coast Guard, local authorities, ministerial services and professional associations of the gambling sector, about online gambling issues.
- d. Examination of players' requests and complaints against online gambling websites and provision of information to players on legal gambling (on the phone or through emails).

Finally, the draft documents for the certification and imposition of the applicable administrative sanctions on the websites included in the black list were prepared.

4.8 COMPLIANCE PROCEDURES FOR GAMBLING ON BROADCAST MEDIA

In the project "Drafting a Manual on Compliance Inspection Procedures for Gambling on Broadcast Media" (project: 4.7 of the approved Action Plan), a draft manual on Compliance Inspection Procedures for gambling on broadcast or other media was prepared. Moreover, possible compliance inspection points were identified and the type of evidence needed for the commencement of compliance inspections started.

The project is estimated to be completed in the 2nd quarter of 2014.

Upon conclusion of this project, the project "Drafting a Manual on Compliance Inspection of Gambling on Broadcast Media" (project: 4.16 of the approved Action Plan) will start. The project is ongoing and is expected to be running until conclusion of the Action Plan 2013-2015.

4.9 COMPLIANCE INSPECTION OF COMMERCIAL COMMUNICATIONS BETWEEN GAMBLING SERVICE PROVIDERS

The projects "Drafting a Manual on Compliance Inspection Procedures for Commercial Communications" and "Inspection of Compliance with the Rules on Commercial Communications" (projects: 4.8 and 4.18 of the approved Action Plan respectively), will start in 2014.

4.10 SETTING-UP A GAMING INSPECTORS' REGISTER

In the project "Setting up a Gaming Inspectors' Register" (project: 4.9 of the approved Action Plan), a draft Manual on the Management of the Inspectors' Register was prepared, in 2013. The draft manual defines:

- a. The conditions for the recruitment of employees for the Gaming Inspectors' Register.
- b. The recruitment of Gaming Inspectors for the Register.
- c. The procedure for the initial evaluation of the candidates.
- d. The procedure for the performance evaluation of inspectors and the evaluation criteria.
- e. The selection criteria for the bodies inspected and the evaluation procedure.

4.11 DRAFTING A MANUAL ON THE GENERAL PRINCIPLES OF COMPLIANCE INSPECTION

The project "Drafting a Manual on the General Principles of Compliance Inspection" (4.20 of the approved Action Plan) was not included in the 2013 Operational Plan. The project started in December 2013 and aims at preparing a manual outlining the general principles and methodology to be followed by the inspectors of the HGC during compliance inspections.

On the basis of this project, information on the principles and methodologies followed in Greece and in other EU countries for compliance inspections of gaming was gathered and a draft manual started being prepared.

The project is estimated to be completed in the 2nd quarter of 2014.

CHAPTER 5: ANNUAL ACTIVITY REPORT ON SOCIAL RESPONSIBILITY

The annual activity report in the field of HGC's social responsibility is presented in conjunction with the projects of the Action Plan 2013-2015.

The projects in this field were carried out by the Directorate of Institutional Cooperation and Social Responsibility.

5.1 ACTIONS AGAINST PROBLEM GAMBLING

The work done by the HGC in 2013 as regards the protection of the public and vulnerable social groups included the following activities.

5.1.1 Actions for the prevention and control of problem gambling

In the project "Actions for the prevention and control of problem gambling" (project: 5.5. of the approved Action Plan), the following actions were taken:

a. Amendment of the decision of the Minister of Development

Decision No. T/6736/2003 (GG Series B, No. 929) of the Minister of Development titled "Regulation on the Administrative Control and Supervision of the Operation of Casinos" was amended. As soon as it took over the supervision and control of the operation of casinos, the HGC amended, by Decision No 73/2/10-10-2013 (GG Series B, No. 2654), article 5: "ENTRY IN CASINO GAMING FACILITIES" and article 32: "EXCLUDED PLAYERS" of Decision No T/6736/2003 (GG Series B, No. 929) of the Minister of Development. The amendment of article 32 aimed at rationalizing and improving the way that the exclusion of players from the casinos of the country and the revocation of such exclusion work. The HGC amended the above articles after having adapted the information it gathered by studying the international practices and contacting its sister regulatory authorities abroad to the Greek reality.

b. Preparation of new Forms for the Exclusion of Players

New forms were prepared for the Exclusion and Revocation of Exclusion of Players, in Greek and in English, so that they conform to the new exclusion procedure. The new forms were established by Decision No PRP3641081113/8.11.2013 (GG Series B, No. 2946) of the HGC and they were sent to the casinos of the country.

c. Preparation of Counseling Forms

Three (3) Counseling Forms were drafted for players participating in casino gambling. Specifically, the following forms were drafted:

- 1) two counseling forms for players who succeeded to have their exclusion revoked and will return to casino gaming facilities,
- 2) a form which informs players on the basic principles of responsible

gambling and the characteristics of irresponsible gambling.

The aim of these documents is to inform and raise awareness mainly among addicted gamblers, who may be capable of gambling rationally and responsibly when they return to the casinos following the waiver of their exclusion. Such documents are the first in a series of tools that will be developed for the same purpose.

The project started in October 2013, it is ongoing and is expected to be running until conclusion of the Action Plan 2013-2015.

5.1.2 Partnerships for the protection of the public and the control of addiction

In the project titled "Partnerships for the protection of the public and the control of addiction" (project: 5.4. of the approved Action Plan), the following actions were taken:

a. Partnership with the Therapy Center for Dependent Individuals (KETHEA)

The HGC cooperated with the Therapy Center for Dependent Individuals (KETHEA) to develop actions for the prevention and control of problem gambling. In this context, HGC officers participated in a preparatory training carried out by specialized employees of KETHEA ALPHA on issues related to problem gambling and on ways of dealing with gamblers that have developed such a behavior. This training was prerequisite for HGC officers to be allowed to participate as observers in the basic program of KETHEA ALPHA, which includes counseling sessions to help problem gamblers overcome their addiction and prevent recurrence under the guidance of a specialized psychologist.

b. Partnership with Gamblers Anonymous

In the same context, the HGC cooperated with Gamblers Anonymous Greece, the Greek representatives of Gamblers Anonymous L.A. - U.S.A. This is a recovery program of "twelve steps" addressed to people with gambling and alcohol problems. Several HGC officers were trained in this program.

5.1.3 Prevalence Study across Greece

The project (project: 5.1 of the approved Action plan) includes a country-wide prevalence study carried out in Greece under the title "Problem Gambling Prevalence Study". The HGC reviewed prevalence studies on problematic gambling internationally, analyzed methodological approaches, examined the most popular tools used worldwide and assessed them as to the pursued objective and the Greek reality.

202 prevalence studies of the period 1975-2012 (Williams, Volbers & Stevens) were examined and the methodology and conclusions of the studies were evaluated in connection with the different types of gambling games. The twelve

(12) most recent ones, which were completed in the period 2010-2012, were further studied and analyzed. As a result, the study which is currently running in Greece was designed, under the title: "Problem Gambling Prevalence Study: A first approach".

It is estimated that the project will be completed in the 4th quarter of 2014.

5.2 PROTECTION OF THE PUBLIC AND OF VULNERABLE SOCIAL GROUPS

5.2.1 Preparation and implementation of thematic training actions

The project titled "Preparation and implementation of thematic training actions" (project: 5.6 of the approved Action Plan) started in December 2013, is ongoing and is expected to be running until conclusion of the Action Plan 2013-2015.

As part of the project, a thematic action was carried out to inform casino managers. Following amendment of Decision No. T/6736/2003 (GG Series B, No. 929) of the Minister of Development on the exclusion of players from the casinos of the country, and in order to inform casino managers and train them to manage gamblers requesting their exclusion to be revoked, the HGC prepared and carried out a training action for the casino employees of the country, under the title: "New Exclusion Procedures - Techniques for Managing Players".

28 employees from 8 casinos participated in the training. The duration of the training was four (4) hours and included a detailed presentation of the exclusion procedure, exclusion by a third party and revocation of exclusion by the player, as well as guidelines for the correct use and conclusion of the new forms for Exclusion and Revocation of Exclusion; during the training, various techniques were presented with the use of theoretical and experiential teaching methods.

CHAPTER 6: ANNUAL ACTIVITY REPORT ON COOPERATION

The annual activity report in the field of cooperation between the HGC and other institutions is presented in conjunction with the projects of the approved Action Plan 2013-2015.

The activities in this field were implemented by the Directorate of Institutional Cooperation and Social Responsibility.

6.1 COOPERATION AT THE EUROPEAN AND INTERNATIONAL LEVEL**6.1.1 Representation of the HGC in an EU Group of Experts**

The project "Representation of the HGC in an EU Group of Experts" (project: 5.8 of the approved Action Plan) was not included in the 2013 Operation Plan. In this project, the HGC participates in an EU Group of Experts (DG Internal Market & Services) on online gambling in Brussels.

In 2013, the following meetings took place:

1st regular meeting: The items on the agenda included the administrative cooperation between gambling regulators in the Member States and, in particular, the creation of an electronic platform for the entry and exchange of data, the protection of minors from Internet gambling, as well as the content of the EU recommendation on responsible advertising.

2nd regular meeting: The items on the agenda included the announcements of the Council of Europe on "match fixing", the methodology proposed for the collection and processing of data for their entry into the EU platform, which will facilitate administrative cooperation between gambling regulators in the Member-States, the EU recommendation on the protection of consumers; the discussion on the Commission's recommendation on responsible advertising was also continued.

3rd regular meeting: The items on the agenda included measures for the implementation, monitoring and control of the consumer protection mechanisms, presentations on problem gambling, actions intended to inform and protect consumers; the EU communications on the role of gambling regulators in the inspection and the penalties for violations of the online gambling regulation were also discussed.

6.1.2 Working group meetings at the European Commission

In 2013, the HGC participated in two (2) working group meetings at the DG Internal Market & Services on issues related to the regulatory and supervisory framework of gaming in Greece. The meetings were attended by the Secretary General and executives from the Ministry of Finance, as well as the President of the HGC, while, on the European Commission's side, the participants were the

Deputy Director General of DG Internal Market & Services and executives from the Directorate General and other EU Services.

6.1.3 Cooperation with equivalent authorities and agencies abroad

As part of the project "Cooperation with equivalent authorities and agencies abroad" (project: 5.9 of the approved Action Plan), which was not in the 2013 Operation Plan, the following information visits were organized:

Visit to the regulatory Authority of the Isle of Man:

The President of the HGC visited the Regulator of the Isle of Man in order to exchange useful knowhow for the organization development of the HGC.

Visit to the regulatory Authority of Italy:

A joint delegation from the HGC and the Cybercrime Unit of the Hellenic Police visited the Italian regulator, Amministrazione Autonoma dei Monopoli di Stato (AAMS), which has a long experience in the VLT sector. Cooperation with the Italian regulator was deemed necessary in view of the installation of VLTs and the launch of VLT gambling by OPAP S.A. and given that VLTs are being installed and operated for the first time in Greece. Furthermore, AAMS arranged for the Greek mission to visit two (2) of the most representative VLT Gaming Halls and have an on-site tour, so as to gain practical knowledge on the organization and operation of such gaming halls.

Visit to the regulatory Authority of Switzerland:

The President of the HGC visited the Swiss regulator (Federal Gaming Board), which has a long experience in casinos. The main purpose of the visit was to acquire knowhow and exchange practical experiences on modern processes and techniques in the supervision and compliance inspection of casino enterprises.

Furthermore, in 2013, the HGC worked with the following authorities to share knowhow:

Cooperation with the regulatory Authority of Cyprus:

Cooperation with the Cyprus regulator following a request by the latter to receive information on the regulatory regime for mutual horse race betting.

Cooperation with the regulatory Authority of Croatia:

Cooperation with the Croatian regulator following a request by the latter to receive information on certification and operation standards for gaming machines.

Cooperation with the regulatory Authority of Poland:

Cooperation with the Polish regulator following a request by the latter to receive information on gambling taxes and criteria.

6.2 PARTICIPATION OF THE HGC IN CONFERENCES AND OTHER EVENTS

In 2013, the HGC participated in the following conferences and events.

6.2.1 ICE Conference 2013

The President and executives from the HGC attended the international conference "ICE Conference 2013" in London. The President of the HGC was one of the featured speakers of the conference. On the occasion of the conference, the HGC delegation also visited the international fair on gaming machines "ICE Totally Gaming 2013". The fair gathered more than 400 participants from all over the globe, who presented the latest technology in gaming machines.

6.2.2 IAGR Annual Conference

The President, a Member and an executive from the HGC participated in the annual conference of the International Association of Gaming Regulators (IAGR) in Oslo.

6.2.3 "E-LIFE 2013" Congress

Executives from the HGC took part in the 3rd Panhellenic Congress organized by the Hellenic Association for the Study of Internet Addiction Disorder (HASIAD) under the title: "E-LIFE 2013 - Prevention and Control of High-Risk Internet Behaviours", which took place in Athens.

CHAPTER 7: ANNUAL ACTIVITY REPORT ON THE DEVELOPMENT OF THE STATUTORY FRAMEWORK OF THE HGC

The annual activity report in the field of development and implementation of the institutional framework for the HGC is presented in conjunction with the projects of the approved Action Plan 2013-2015.

The projects in this field were carried out by the Directorate for Financial and Administrative Affairs, with the exception of paragraph 7.6 of this chapter.

7.1 REGULATION ON THE ORGANIZATION, OPERATION AND STRUCTURE OF THE HGC

This project (project: 6.1. of the approved Action Plan) started in March 2013 and has been completed.

The "Regulation on the Organization, Operation and Structure of the HGC Service Units" was approved by Decision No. 64/3/23.07.2013 (GG Series B, No. 1819) of the HGC as amended by Decision No. 70/6/12-09-2013 (GG Series B, No. 2323) of the HGC. The Regulation defines the organizational structure of the services making up the HGC, the responsibilities of each individual service, the number of employees per category, sector and specialty taking into account the existing statutory posts, and other relevant issues.

7.2 REGULATION ON THE FINANCIAL OPERATION AND MANAGEMENT

Decision No.6/1/24.4.2012 (GG Series B, No. 1347) of the HGC approved the Regulation on the Financial Management of the HGC with a view to establish a framework for the expenditure and revenue that the HGC had to manage in the early stages of its organization and operation. In that period, from 2012 until September 2013, the HGC had 27 employees and its expenditure was relatively low. By the end of 2013, the HGC had assumed almost the entirety of its duties and was employing 110 people; by the end of 2014 the number of employees is expected to reach 200 people. The increased number of employees, in combination with the volume of expenditure and revenue that the HGC has to manage, as a result of its extended scope of activities, created a need to update the current regulation on financial management. For that purpose, project 6.2 of the approved Action Plan was carried out; the project was completed in October 2013 and now, as stipulated by paragraph 4, article 23 of Law 4141/2013 (GG Series A, No. 81), a new Regulation on the Financial Operation and Management is to be introduced by decision of the Ministry of Finance, which will be issued and published in the Government Gazette, following a proposal by the HGC.

The scope of the Regulation on the Financial Operation and Management covers the collection, management and distribution of resources, all types of expenditure, the accounting records, as well as monitoring of revenue and expenditure and all the other relevant issues.

7.3 REGULATION ON THE PURCHASE OF GOODS AND SERVICES, LEASES, STUDIES AND PROJECTS

This project (projects: 6.3 and 6.4 of the approved Action Plan) regulates various aspects of the following issues:

- a. decision-making bodies and the administrative procedures followed in the field of procurement,
- b. leasing of property by the HGC, management bodies, as defined in Presidential Decree 715/1979, and the constitution of the relevant committees provided for therein,
- c. preparation of engineering studies and provision of other engineering services,
- d. execution of contracts for engineering studies and services.

In particular, the purchase of goods and services by the HGC is governed by the following provisions, depending on the scope and the budgeted expenditure of the contract:

- e. the Regulation on Public Procurement (P.D. 118/2007 - GG Series A, No. 150), as in force,
- f. Directive 2004/18EC "on the coordination of procedures for the award of public works contracts, public supply contracts and public service contracts" (Law 134/30-04-2004) and its transposition into Greek legislation (P.D. 60/2007 - GG Series A, No 64) and
- g. Law 2286/1995 (GG Series A, No. 19) "on public sector procurement and other relevant issues" in combination with Decision No. P1/3305/3.11.2010 (GG Series B, No. 1789) of the Deputy Minister of Economy, Competitiveness and Maritime Affairs on "Award, execution and procedures followed for the award of procurement contracts, in application of article 2 (par. 5, 12, 13 and 16) of Law 2286/1995)".

Property leases are governed by Section III of P.D. 715/1979 (GG Series A, No 212).

The conclusion and execution of contracts for engineering studies and services by the HGC is decided upon and carried out by its bodies. The conclusion and execution of contracts for engineering studies and other services on behalf of the HGC under Law 3316/2005 (GG Series A, No. 42) are governed by this particular law and any other legislation applicable in this field. All other services are governed by the provisions on public procurement. Contracts for engineering studies and services are only allowed, if they fall outside the scope of the normal job duties of the HGC employees. The Supervising Authority and the Managing Service, as defined in Law 3316/2008, are the HGC and the Directorate of IT, Telecommunications and Technical Services of the HGC, respectively.

The HGC completed the draft Regulation on the Purchase of Goods and Services, Leases, Studies and Projects in October 2013 and now, as stipulated by paragraph 4, article 23 of Law 4141/2013 (GG Series A, No. 81), the regulation is to be

introduced by decision of the Ministry of Finance, which will be issued and published in the Government Gazette, following a proposal by the HGC.

7.4 TRAVEL REGULATION

This project (project: 6.5 of the approved Action Plan), regulates any kind of official travel undertaken by the members of the HGC and the employees working in it. The HGC completed the above regulation in October 2013 and now, as stipulated by paragraph 4, article 23 of Law 4141/2013 (GG Series A, No. 81) the regulation is to be introduced by decision of the Ministry of Finance, which will be issued and published in the Government Gazette, following a proposal by the HGC.

7.5 STAFF REGULATION

This project (project: 6.6 of the approved Action Plan) was scheduled to start in the 4th quarter of 2013 and be completed in the 3rd quarter of 2014. The project started in the 4th quarter of 2013, it is currently in progress and is expected to be completed by 2014.

7.6 REGULATION ON THE CODE OF CONDUCT FOR THE MEMBERS AND STAFF OF THE HGC

In this project (project: 6.7 of the approved Action Plan) the Regulation on the Code of Conduct for the Members and Staff of the HGC was drafted and is currently in the stage of final ratification by the HGC. The Regulation sets a framework of general principles and rules of conduct for the Members and employees of the HGC which govern their service duties and professional ethics. In particular, the regulation or otherwise the Code of Conduct:

- a. formulates the general principles that are the basis for the operation and execution of the regulatory tasks of the HGC,
- b. establishes rules on the relations between employees in terms of internal communication and communication with third parties,
- c. establishes rules of professional conduct and daily practice,
- d. outlines the main obligations of the employees and members of the HGC.

The project was implemented by the Directorate of Institutional Cooperation and Social Responsibility.

7.7 CODIFICATION OF GAMING LAWS

Project 6.8 of the approved Action Plan was scheduled to start in 2014. However, due to the new regulations which are intended to improve the relevant legislative framework, the codification of the laws governing the HGC and of gaming laws started in 2013 and will continue in 2014.

The project is carried out in cooperation with the Legal Department.

CHAPTER 8: ANNUAL ACTIVITY REPORT ON THE ORGANIZATION AND OPERATION OF THE HGC

The annual activity report in the field of development and implementation of systems for the organization and operation of the HGC is presented in conjunction with the projects of the approved Action Plan 2013-2015.

8.1 SETTING UP SYSTEMS OF OPERATION OF THE HGC**8.1.1 Setting up a Performance Evaluation System**

In September 2013, almost 90 employees were seconded to the HGC. Immediately after that, project 7.1 of the approved Action Plan for the setting-up of a Performance Evaluation System for the HGC staff was launched.

The project is ongoing and its conclusion is scheduled for the 2nd quarter of 2014. It is carried out by the Directorate for Financial and Administrative Affairs.

8.1.2 Setting up a monitoring system for the HGC Strategic Plan and Operational Plan

In this project (project: 7.2 of the approved Action Plan) the system for the drafting and monitoring of the Strategic Plan and the Operational Plan of the HGC was redesigned. The redesigned project will offer the following possibilities:

- a. Establish the needs and create a hierarchy of priorities.
- b. Evaluate the degree of achievement of the planned outcome, in order to make any necessary corrections in time and revise the projects according to the internal and external developments in the HGC.
- c. Measure the performance and effectiveness of projects, taking into account the financial figures on the operation of the HGC.

The deliverables of the project were defined, as follows:

- a. A manual on the methods and processes for the drafting, revision and monitoring of the Strategic Plan and the Operational Plan.
- b. Special worksheets (electronic forms).
- c. Project implementation software.

The project is ongoing and its conclusion is scheduled for the 3rd quarter of 2014. It is carried out by the Directorate of Planning and Operational Standards.

8.1.3 Setting up a System for the drafting of the HGC Annual Budget and Annual Report

During implementation of the project (project: 7.3 of the approved Action Plan) it was deemed necessary that it be divided into two separate projects: project "Setting up a System for the drafting of the HGC Annual Budget" and project:

"Setting up a System for the drafting of the HGC Annual Report". More specifically, the system was redesigned during implementation of the project, so as to:

- a. Allow that the annual Budget and the revised Budget can be drawn up in time and following an agreed procedure.
- b. Develop tools which would be used to describe and meet the financial objectives.
- c. Ensure consistency in the processes followed for the drafting of the budget.

The deliverables of the project were defined, as follows:

- a. A manual on the methods and processes for the drafting, revision and monitoring of the budget.
- b. Special worksheets (electronic forms).
- c. Project implementation software.

The project is ongoing and its conclusion is scheduled for the 3rd quarter of 2014. It is carried out by the Directorate of Planning and Operational Standards.

8.1.4 Setting up an internal communication and Electronic Communication system for the HGC.

The project "Setting up an internal communication and Electronic Communication system for the HGC" (project: 7.4 of the approved Action Plan) is completed. The HGC is now fully covered in terms of telecommunications equipment, e-mail addresses, Local LAN and webpage.

The project was carried out by the Directorate of IT, Telecommunications and Technical Services.

8.1.5 Setting up a Quality management system (ELOT EN ISO 9001)

During implementation of the project (project: 7.5 of the approved Action Plan) the following actions were performed:

The project for the setting-up of a quality management system (ELOT EN ISO 9001) was redesigned and the resources required for its implementation, the stages and the timeline were redefined.

The draft key procedures were prepared, two of which (Procurement Procedure and Training Procedure) were forwarded to the competent service units for comments, updating and finalization.

The draft Document Management Procedure of the HGC was also prepared; the Procedure will be finalized in 2014 and consists in:

- a. Incoming Document Management by the Central Registry of the HGC.
- b. Document Management in the Service Units.
- c. Document Creation by the Author.

- d. Document Management by the General Directorate.
- e. Document Management by the President's Office.
- f. Classified Document Management by the President's Office.
- g. Document Management by the HGC Secretariat.
- h. Outgoing Document Management by the Author.
- i. Outgoing Document Management by the Central Registry.
- j. Authentication of signatures and documents by the central registry.

The project is ongoing and its conclusion is scheduled for the 2nd quarter of 2014. It is carried out by the Directorate of Planning and Operational Standards.

8.1.6 Setting up a database for the International Regulatory Framework

In this project (project: 7.6 of the approved Action Plan) a database was created in Access 2010. The database is expandable and new categories of files can be added, while the existing categories of files can also be expanded by more categories of data. It is a dynamic, reliable and user-friendly content management platform, which allows users to make the best possible use of the data it contains. The database is being constantly updated.

The regulators registered in the database so far are located in the following geographical areas:

- a. Europe: The regulators from 32 countries have already been registered and their data is being updated.
- b. North America and the Caribbean: The registration and entry of regulators in the database is in progress.
- c. Oceania: The registration and entry of regulators in the database is in progress.
- d. Asia: The registration and entry of regulators in the database is in progress.
- e. Africa: 32 regulators have already been registered.

The purpose of the project is to register the counterparts of the HGC across the world. The project objectives are summarized as follows:

- a. Record the regulators in other countries.
- b. Have direct access to their details.
- c. Instantly retrieve information about the legal and regulatory framework of the regulators in other countries.
- d. Have quantitative data available per country and regulator.
- e. Have qualitative data available per regulator.
- f. Extract statistical data.
- g. Extract comparative data.
- h. Have an automated system for group mails.

- i. Instantly retrieve information about international developments in the field of gaming.
- j. Automatically issue thematic reports on gaming per country.

The project is ongoing and is scheduled to be running until conclusion of the Action Plan 2013-2015; it is carried out by the Directorate of Institutional Cooperation and Social Responsibility.

8.1.7 Setting up a system for the management of the financial and physical scope of training and information events organized by the HGC.

In project 7.9 of the approved Action Plan, a relational database was designed and developed in Access 2013. The database is expandable and offers the following possibilities:

- a. Add data, find data, extract data etc.
- b. Create registration forms.
- c. Compile and issue reports and overviews of results.

Once the database becomes operational, all training and information activities carried out or attended by the HGC will be registered, in order to ensure immediate control and monitoring of the physical and financial scope of such activities.

The Directorate of Institutional Cooperation and Social Responsibility has already completed the project; however, the database will continue being updated throughout the implementation of the Action Plan 2013-2015.

8.2 STAFFING AND DEVELOPMENT OF HUMAN RESOURCES IN THE HGC

8.2.1 Staffing of the HGC

On 31-12-2012, the HGC staff was made up of thirty-three (33) seconded employees originating in other services and bodies of the public sector and the wider public sector. The financial situation in Greece has led the HGC to adopt, as a standard principle, the effort to make full use of all human resources available to the Greek State before seeking to acquire extra ones, so as to avoid increased costs both for the HGC and the Greek State. Against this backdrop, the following steps were taken for the secondment or transfer of employees to the HGC, in 2013:

a. Secondment of employees to the HGC:

On 16th April 2013, Call for Expression of Interest No. 2/2013 was issued, on the basis of paragraph 17, article 7 of Law 4038/2012 (GG Series A, No. 14), as amended and in force, following item a, paragraph 7, article 23 of Law 4141/2013 (GG Series A, No. 81), for the secondment of employees from other

services and bodies of the public and the wider public sector, who wished to work for the HGC. The deadline for submission of applications was 24th May 2013.

On 24th May 2013, the submission of applications in response to the call for expression of interest for secondment to the HGC was completed.

216 candidates from various sectors and specialties responded to the call. Among the applicants, 201 were applying for the first time under the above call and 15 had already applied under a previous call in 2012 and were actually reaffirming their interest.

Out of the 201 candidates of the 2013 call, 189 were invited for an interview, whereas 11 candidates were not invited at all, since they had already withdrawn their interest. Out of the 15 applicants of the 2012 call who reaffirmed their interest by participating in the 2013 call only 5 were invited for an interview; the remaining 10 candidates had already been interviewed in 2012, when the first call was launched, and had been found unsuitable for the needs of the HGC. Consequently, a total of 194 candidates were finally called for an interview.

On 30th August 2013, Decision No. D1A 1132866 EX 2013 of the Minister of Finance was issued following a recommendation by the HGC and 53 people were seconded to the HGC for two (2) years.

On 2nd May 2013, Decision No. D1A 1149614 EX 2013 of the Minister of Finance was issued following a recommendation by the HGC and 38 people, who were working at the Directorate of Casino Supervision of the Ministry of Tourism on 31/08/2013, were seconded to the HGC for six (6) months, pursuant to paragraph 2, article 99 of Law 4182/2013.

On 4th October 2013, Decision No. D1A 1150962 EX 2013 of the Minister of Finance was issued following a recommendation by the HGC and 13 people were seconded to the HGC for two (2) years.

Finally, in the period between 29th January 2013, when Decision No. 5741/51 was issued, and 6th August 2013, when Decision No. D1A 11123390 EX2013 of the Minister of Finance was issued, following a recommendation by the HGC, the secondment of 6 people was terminated.

The above decisions brought the number of people working in the HGC from 27 seconded employees in September 2013 to one hundred and thirteen (113) seconded employees from other services and bodies of the public sector and the wider public sector on 31-12-2013.

b. Transfer of employees to the HGC:

The transfer of employees to the HGC started in April 2013, in accordance with paragraph 1, article 23 of Law 4141/2013 (GG Series A, No. 81).

The Organizational Regulation of the HGC provides for eighty (80) statutory posts in total, which are occupied either by permanent staff or by workers employed under an employment agreement governed by private law. Furthermore, according to the Organizational Regulation, the procedure to be followed in the initial stage of its implementation so as to fill the statutory positions is the procedure laid down in paragraph 1, article 23 of Law 4141/2013 (GG Series A, No. 81).

Therefore, on the basis of paragraph 1, article 23 of Law 4141/2013 (GG Series A, No. 81), the following steps were taken in 2013 for the transfer of employees to the HGC:

- a. In April 2013, the seconded staff that was working in the HGC on 31st December 2012 was informed in writing that they were being offered the possibility to express their interest on the basis of the above provisions.
- b. On 19-4-2013 the deadline for submission of applications for transfer to the HGC expired.
- c. On 27-9-2013, Decision No. 66/2/26-7-2013 of the HGC, which included the HGC recommendation provided for in paragraph 1, article 23 of Law 4141/2013 (GG Series A, No. 180), was transmitted to the Ministry of Finance to initiate the transfer of sixteen (16) employees who would cover the vacant statutory posts in the HGC.

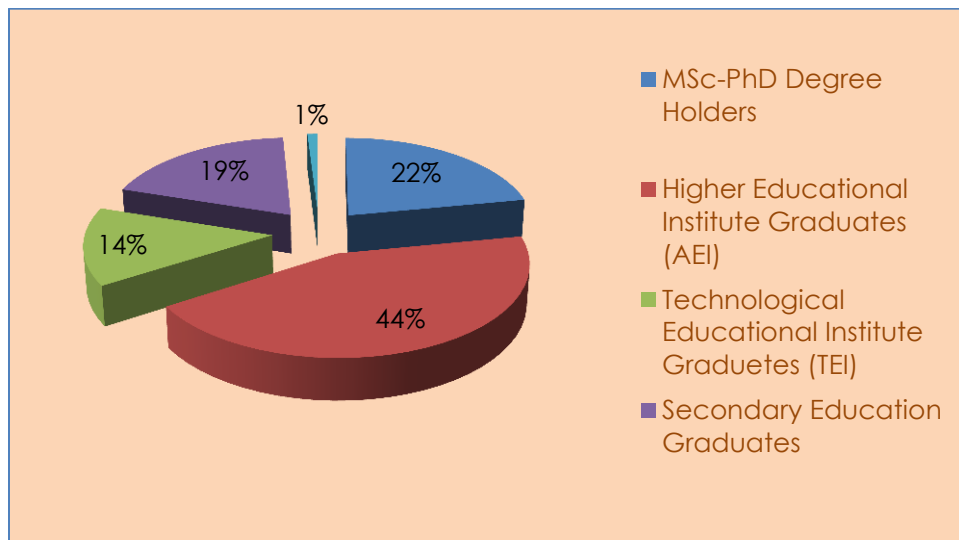
On 31/12/2013 all the statutory posts provided for in the Organizational Regulation of the HGC were still vacant, as the above transfers had not been completed by the end of 2013.

As a result, the project is ongoing, it is expected to be running until conclusion of the Action Plan 2013-2015 and it is carried out by the Directorate for Financial and Administrative Affairs.

8.2.2 Qualifications and specialties of the staff working in the central services

Diagram 1 below shows the level of qualifications of the staff seconded to the HGC and working in the Central Services on 31st December 2013.

Diagram 1: Qualifications of the staff working in the central services



Source: HGC

As soon as it took up its duties, the HGC embraced the principle according to which the ratio of staff with higher education qualifications or above to the staff having completed the compulsory education or secondary education level should be 75% to 25% respectively.

Apart from the above employees working in the Central Services, there are also thirty three (33) seconded employees who are authorized officers (casino inspectors) and form the compliance inspection teams for casino enterprises.

8.2.3 Training of staff

The following actions were taken as part of projects 7.7 and 7.8 of the approved Action Plan to promote further training for the HGC staff:

a. Cooperation with the Institute for Training (INEP) of the National Centre for Public Administration and Local Government (EKDA)

The HGC considers it necessary to ensure that an adequate level of further training is provided to its staff in various fields, such as the organization and administration of public sector bodies, project management, drafting and monitoring of action plans, budget, cost calculation, public procurement, human resources management, etc.

In this context, in November 2013, the HGC sought to work with the National Centre for Public Administration and Local Government and particularly the Institute for Training (INEP) so as to ensure training for its staff. In December 2013, two HGC employees participated in the further training programmes offered by INEP.

b. Information to the staff:

The staff working in the HGC comes from different services and agencies of the public sector and the wider public sector. The HGC deemed it necessary to inform the staff about the content and scope of its activities and about the way it is organized and works.

For that reason, an intensive induction course was specifically designed to provide all the staff within the HGC with the information they would need in order to quickly adapt to the requirements of the HGC. The course under the title "The organization and operation of the HGC" was held from 11/10/2013 to 13/10/2013 and included the following topics:

- a. The Role and Operation of Independent Authorities,
- b. Introduction to gaming,
- c. An overview of the HGC,
- d. Annual Activity Report 2012,

- e. Action Plan 2013-2015,
- f. Presentation of the HGC Service Units,
- g. Internal administrative procedures.

The further training project is ongoing, it is expected to be running until conclusion of the Action Plan 2013-2015 and it is carried out by the Directorate for Financial and Administrative Affairs.

8.3 COMMUNICATION

As part of project 7.10 "The Communication Programme of the HGC" of the approved Action Plan 2013-2015, the Communications Office took the following actions:

a. Communication with the Media

A series of actions were undertaken with a view to establish a network with the foreign press correspondents in Greece and there have also been contacts with journalists based abroad. The list of journalists that will be accredited to the HGC was processed. As more than one ministry is involved with the work of the HGC (e.g. Ministry of Economy, Development, Public Order and Citizen Protection, Tourism, etc.), it is currently being considered how many and which journalists should be included in the list so that all topics are covered. The list of accredited journalists is expected to be published in 2014.

b. Development of social media

In December 2013, a "Plan for the management of social media" was prepared, as part of the effort to make the HGC capable of communicating through the social media.

The plan aims at formulating a long-term communication strategy with the use of social media (twitter, Facebook, YouTube, etc.) so as to allow the HGC to better promote its work. As a result of this plan, a twitter account was created on 19.12.2013, namely @HGCommission.

c. Communication through the Internet

A prime version of the original design of the HGC website was launched in order to cover the initial need of providing information to the public (decisions, annual activities report 2012, operation data, financial data, black list, etc.) You can access the website at: www.gamingcommission.gov.gr

Subsequently, the website was redesigned in terms of content and structure and a "tree" was developed, whereby new thematic areas were created, so as to fully cover the work of the HGC. The new website had to fulfill the following requirements:

- 1) An outward looking authority: The HGC website is a point of contact; citizens and stakeholders can interact with the HGC, not only for information, but also for e-services, i.e. licensing, certification, etc.
- 2) A user-friendly web environment: The website must be user-friendly and at the same time attractive and understandable.

The re-designed website and its content are expected to be available in the 2nd quarter of 2014.

d. Creation of a communication identity for the HGC

In its effort to become a distinct authority with its own personal identity and effectively disseminate its messages, the HGC finalized its logo, which consists of the coat of arms and the sign of the HGC. The logo exists in two versions, a Greek version and an English version.

8.4 DEVELOPMENT OF IT SYSTEMS

As part of projects 7.11, 7.12 and 7.15 of the approved Action Plan titled: "Creation of a data center", "Development of an IT system to support processes, licensing, certification and compliance inspection and to monitor the relevant registers" and "Development of an IT system for supervision and compliance inspection (ITSCI)", the following actions were taken:

In the light of the issue and implementation of the regulation on electronic amusement games and the regulation on VLT gambling, the HGC services prepared

the technical specifications for the development and operation of an integrated IT system. In this respect, an open public tender procedure was initiated on the basis of Call for Tenders No. 6/2013 titled " Development of an integrated IT system for the management and compliance inspection of the operation and certification of Electronic amusement games and games of chance on gaming machines", with a total budget of 90,000 €, VAT excluded. The tender is now in the final stage of selection of the successful bidder.

The IT systems of all licensed gambling operators will be obligatorily connected to the IT System for Supervision and Compliance Inspection (ITSCI) provided for in article 30 of Law 4002/2011, which will ensure supervision and compliance inspection of gaming machines, collection of data, detection of problems and a smooth and reliable operation of gambling in general; According to item b, paragraph 6, article 22 of Law 4141/2013 (GG Series A, No. 81) "Until the ITSC is installed and starts operating, the licensees must provide the HGC with full remote access to their Central IT Systems. A decision of the HGC will define the detailed process for gaining access to the Central IT Systems of the licensees in order to ensure implementation of the provisions of this law.". Thus, the HGC is now in the stage of drawing up the necessary technical specifications.

The projects are ongoing and are carried out by the Directorate of IT, Telecommunications and Technical Services.

8.5 DEVELOPMENT OF THE INFRASTRUCTURE AND EQUIPMENT OF THE HGC

8.5.1 Buildings - premises

Resolution No 402/12-12-2012 of the Board of Directors of the Public Properties Company (ETAD S.A.) abolished the concession of the 6th floor and the parking spaces 1-42 of the public property situated at 196-198, Thivon Str. with Land Registry No. 111P, which had been conceded to the HGC to be used as its premises. Subsequently, the HGC was informed by virtue of Document No. 567/21-01-2013 of ETAD S.A. that no other public building was available. As a result and despite its efforts, the HGC did not manage to find a public building for its premises.

Of course, any further delay in finding a permanent solution for its premises would cause an equivalent delay in the recruitment of more staff and the installation of the IT systems and would extend the period of inability of the HGC to take up and effectively perform the duties described in the applicable provisions.

For that reason, the HGC deemed that there were grounds for characterizing the situation as urgent and for leasing its new premises by initiating the procedure provided for in paragraph 1, article 26 of PD 715/1979 as in force, which applies to the lease of property by the HGC, on the basis of Decision No. 39/7/14-1-2013 (GG Series B, No. 43). In this context, the HGC unanimously decided to search the

market for available properties and published a call for expression of interest for the lease of office premises.

The owners of 16 properties responded to this call. Designated employees of the HGC examined all the bids and made an on-site inspection of the properties offered.

As soon as the evaluation was complete, the HGC decided for the property situated at 17, Acharnon Str. and Mavrokordatou Sq., which belongs to "Hellenic Exchanges – Athens Stock Exchange S.A." (EXAE), which was subsequently leased. The leased property is a detached building whose total mixed surface area is 3,576.72 m². The lease involves the building, its electromechanical equipment, strong and weak current grids and the entire office equipment, which are all owned by EXAE and have been installed at its own cost and expense. The premises have full and modern electromechanical equipment, a fiber optic network and category 5e and 6 structured cabling, a fully-equipped and secure Computer Room, a generator, UPS, a fire fighting pump group with pressure tank, entry/exit card readers on every floor, CCTV, an alarm system, a Building Management System and 5 parking spaces in an indoor parking station located opposite the building.

The initial lease rate offered was 8.39 €/m², which was negotiated down to 5.81 €/m², as a fixed rate for the whole period of the lease agreement. The payments are quarterly. The lease rate is close to the minimum threshold provided for in paragraph 3, article 2 of Law 4081/2012, according to which the annual lease rate for the lease agreements that the public sector has already concluded cannot be less than 4.80% of the statutory value of the property. Although the above provisions do not apply to new lease agreements but only to the ones already in effect, the above calculation formula was used as proof that the lease rate is in the best interest of the HGC. The HGC moved in the above building on 1st July 2013 and has been operating there ever since.

The project on premises was carried out by the Directorate of IT, Telecommunications and Technical Services.

8.5.2 Office equipment

a. Office furniture.

The HGC has adopted the rule on the utilization of available resources which dictates that it should make full use of all human resources available to the Greek State before seeking to acquire new ones, so as to avoid increased costs for both the HGC and the State as a whole. Based on these premises, the HGC has managed to fully equip its offices with furniture from the "Athens 2004" Organization, which was conceded to it by the Ministry of Culture.

b. Electronic office equipment

On the basis of Call for Tenders No. 7/2013, titled "Purchase and installation of additional computers, software and other electronic equipment", an open public tender procedure was initiated, whereby the HGC ensured that every single employee is equipped with a computer and software. In 2013, the HGC had a local network which interconnected 93 computers of the latest generation (Active Directory infrastructure). Furthermore, on the basis of the above call for tenders, the HGC purchased and is now in possession of all the peripheral equipment needed (servers, printers, transducers).

c. Communications Equipment

The HGC has a modern call centre with a capacity of 30 external lines and 300 internal lines. It also has a local wireless communication network (Wi-Fi), while all employees have Internet access and their own e-mail address which the HGC provides through its cloud computing services.

The project for the acquisition of equipment was carried out by the Directorate of IT, Telecommunications and Technical Services.

CHAPTER 9: FINANCIAL DATA**9.1.1 Financial data of the HGC for 2013**

According to the provisional financial data (balance sheet), total expenditure in 2013 is estimated at 2,195,703.40 € and was covered with the remaining balance of the grants received in the first year of operation of the HGC. These are the categories of expenditure incurred in 2013:

a. Fixed - Investment Costs

Investment Costs amounted to 176,325.89 € and consist of the costs of establishment, the purchase of computers, electronic systems and the necessary software, the purchase of communications equipment and other equipment.

Investment Costs account for 8% of the total expenditure of the HGC.

b. Operating Expenses

Operating Expenses amounted to 2,019,377.51 € and include:

Payroll costs: The cost of employee salaries, including employer contributions and other labour costs, amounted to 1,382,213.45 €. This amount refers to the cost for the employment of 27 people until September 2013 and 113 people in the period September-December 2013. Payroll costs account for 68.4% of the total Operating expenses and 62.9% of the total expenditure of the HGC.

Other Operating Expenses: This cost is estimated at 637,164.06 € and is analyzed as follows:

- Operating expenses for third-party costs in the amount of 101,974.15 € (5% of total operating expenses).
- Various costs, such as rents, power supply, water supply, telecommunications, building maintenance and other services, totaling 258,769.34 € (12.8% of total operating expenses),

Other expenses: These expenses include the cost of reception, hosting, promotion, subscriptions, stationary, consumables and travel costs, totaling 276,420.57 € (13.8% of total Operating Expenses). It should be noted that travel costs and, in particular, per diem for the casino inspectors who are required to travel across the country and be physically present in the casino enterprises 24hours a day and throughout the year account for 86% of this category of expenditure.

9.1.2 Budget of the HGC for 2014

In October 2013, the HGC presented its annual balanced Budget of Revenue and Expenditure for 2014, which was approved by Decision No 73/3/10-10-2013.

Subsequently, the Budget was annexed to the State Budget, was approved by the Hellenic Parliament and was posted on the website of the programme "Diavgeia".

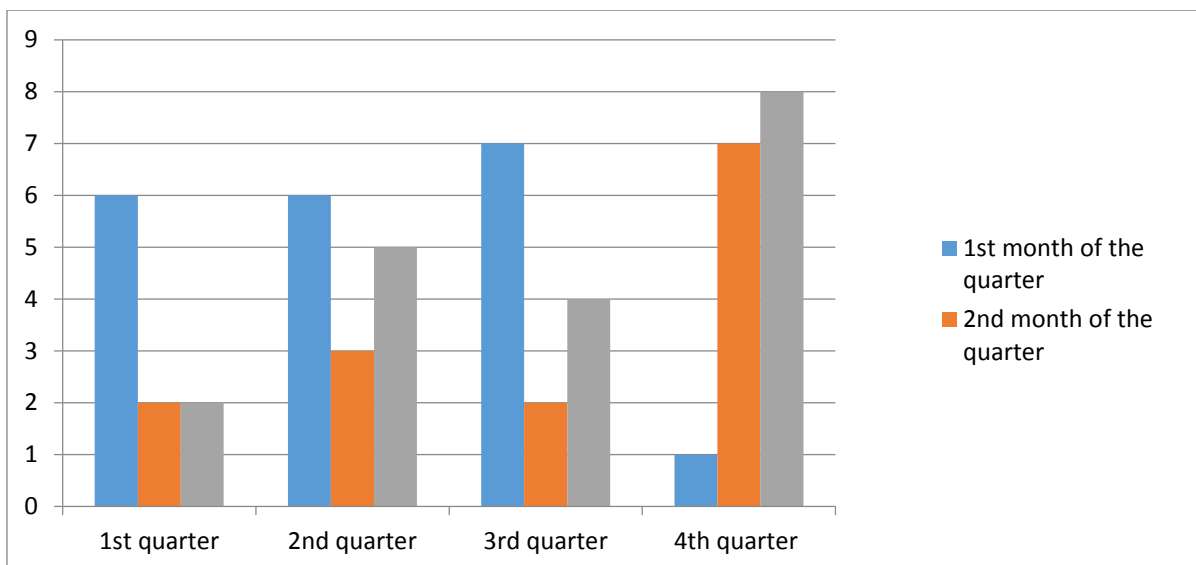
The 2014 Budget was drawn up by the Directorate of Planning and Operational Standards and the Directorate for Financial and Administrative Affairs, in cooperation with all the service units of the HGC.

CHAPTER 10: HGC MANAGEMENT ACTIVITIES

The members of the HGC had regular meetings and decided upon issues related to the regulation and supervision of the gaming market, issues of a regulatory character, proposals for regulations and administrative and organizational issues. Fifty-three (53) meetings were held to examine two hundred and seventy-one (271) issues.

The following table shows a timeline of the meetings.

Number of monthly and quarterly meetings in 2013



The Secretariat of the HGC has kept minutes of the meetings and has issued exact copies and excerpts of the relevant decisions.

CHAPTER 11: THE OPERATIONAL PLAN OF THE HGC FOR 2014

11.1 THE ACTION PLAN OF THE HGC FOR THE PERIOD 2013-2015

In the context of its medium-term planning, the HGC prepared, in 2012, an Action Plan for the period 2013-2015. Decision No 46/4/05-04-2013 of the HGC approved the Action Plan 2013-2015, which had already started in early 2013.

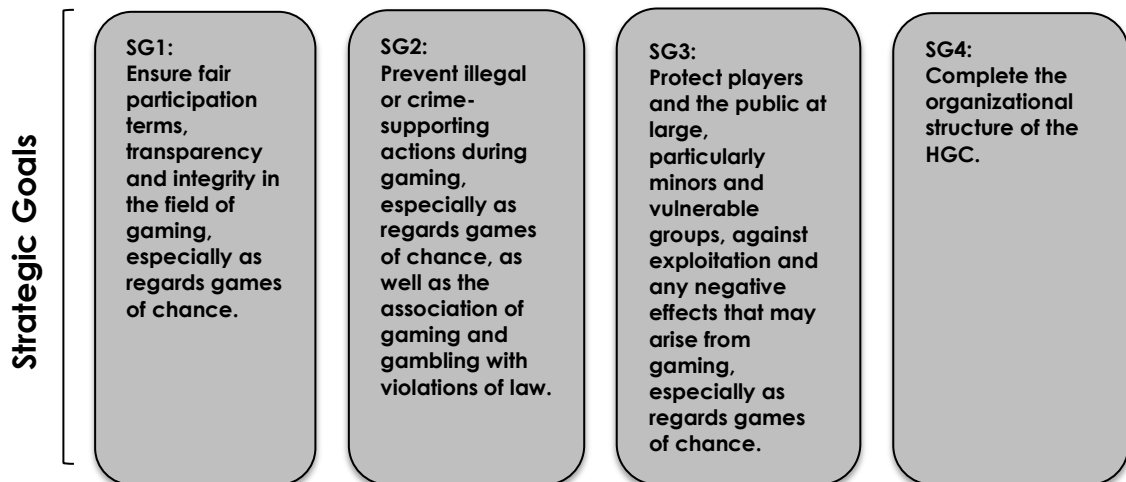
Each year, the service units of the HGC carry out the projects included in the Operational Plan for that year, on the basis of the approved timetable and the available appropriations in the annual budget.

The Operational Plan is drawn up on a yearly basis and is revised during the year, whenever internal and external developments in the HGC demonstrate the need for such a revision in order to ensure a more efficient and effective operation of the HGC.

The Action Plan and the Strategic Goals and Operational Priorities it contains are the basis for the annual report on the activities of the HGC.

11.2 STRATEGIC GOALS

The Action Plan comprises seven (7) Operational Priorities, intended to serve its four (4) Strategic Goals (SG1, SG2, SG3 and SG4), which are as follows:

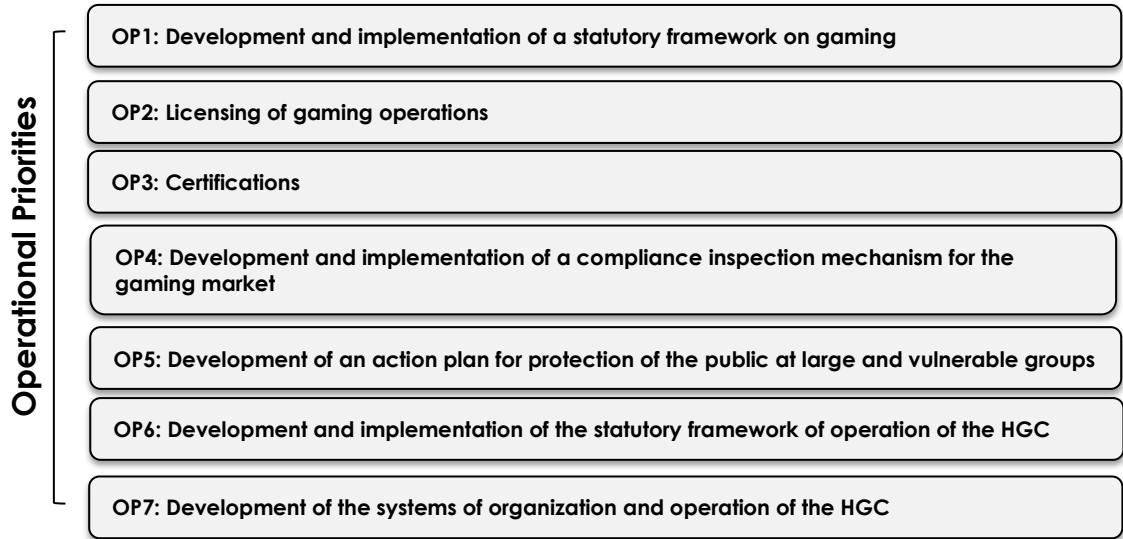


11.3 OPERATIONAL PRIORITIES

The Operational Priorities are fundamental choices of the HGC, which determine how and in which field of activities the Strategic Goals will be pursued.

Each Operational Priority is analyzed into hierarchically organized, scheduled projects; this makes the 2013-2015 Action Plan a comprehensive tool, allowing to plan and monitor the progress of implementation and serving as a guide for the HGC services when preparing and drafting the individual actions of the Operational Plan for the year of reference.

The Action Plan comprises the following seven (7) Operational Priorities:



11.4 2014 OPERATIONAL PLAN OF THE HGC

The 2014 Operational Plan includes specialized, hierarchically organized and specifically scheduled projects, whose implementation serves as a tool to fulfill the Strategic Goals.

The following schedule presents the projects of the 2014 Operational Plan per Operational Priority. Furthermore, according to the initially approved Action Plan 2013-2015, the stage of implementation of the 77 projects included in it is characterized as: "Completed" (15 projects) or the project has started and it is an "Ongoing project" (37 projects) or it is a "Project awaiting implementation" (25 projects); another 22 new projects which had not been included in the initial Action Plan are characterized as "New Project", of which 2 have already been completed.

2014 OPERATIONAL PLAN												
PROJ CT CODE	PROJECT TITLE	Strategic Goals (SG)				2013	2014 (per quarter)				2015	PROJECT IMPLEMENTATION STAGES
		1	2	3	4		a	b	c	d		
Operational Priority (OP1): Development and implementation of a statutory framework on gaming												
1.1	Drafting a regulation on the operation and compliance inspection of electronic amusement games on gaming machines.	•				√						Completed
1.2	Drafting a regulation on the operation and compliance inspection of online amusement games.	•					√	√	√			Ongoing project
1.3	Drafting a regulation on the operation and compliance inspection of online gambling.	•				√	√	√				Ongoing project
1.4	Drafting a regulation on the operation and compliance inspection of games of chance played on VLT gaming machines.	•				√						Completed
1.5	Drafting regulations on the operation and compliance inspection of games operated by OPAP S.A.	•							√	√	√	Project awaiting implementation
1.6	Drafting a regulation on the operation and compliance inspection of mutual horse race betting.	•				√	√	√				Ongoing project
1.7	Drafting a General regulation on the operation and compliance inspection of the State Lotteries game.	•										Completed
1.8	Drafting a regulation on the operation and compliance inspection of gambling on broadcast media.	•				√	√	√	√	√	√	Ongoing project
1.9	Drafting a regulation on the operation and compliance inspection of casino gambling.	•				√	√	√	√	√		Ongoing project
1.10	Overview of gaming laws.	•	•	•		√	√	√	√	√	√	Ongoing project
1.11	Drafting a regulation on gaming penalties.		•	•		√	√	√	√	√		Ongoing project
1.12	Drafting a regulation on commercial communications.	•	•	•		√						Completed
1.13	Drafting a Special regulation on the operation and compliance inspection of the "Ethniko" lottery game.	•				√	√	√				New project Ongoing
1.14	Drafting a Special regulation on the operation and compliance inspection and of the "Laiko" lottery game.	•				√	√	√				New project Ongoing
1.15	Drafting a Special regulation on the operation and compliance inspection and of the Special Lotteries game.	•						√	√			New project Ongoing
1.16	Drafting a Special regulation on the operation and compliance inspection of the Instant Lottery game.	•				√	√					New project Ongoing
1.17	Checking the legality of operation of the companies falling under the	•		•		√						New project

2014 OPERATIONAL PLAN												
PROJ CT CODE	PROJECT TITLE	Strategic Goals (SG)				2013	2014 (per quarter)				2015	PROJECT IMPLEMENTATION STAGES
		1	2	3	4		a	b	c	d		
		transitional regime of paragraph 12, article 50 of Law 4002/2011.										Completed
Operational Priority (OP 2): Licensing of gaming operations												
2.1	Issuance of operating licenses for electronic amusement games played on gaming machines.	•	•	•					√	√	√	Project awaiting implementation
2.2	Issuance of operating licenses for online gambling.	•	•	•						√	√	Project awaiting implementation
2.3	Issuance of operating licenses for gambling on broadcast media.	•	•	•							√	Project awaiting implementation
Operational Priority (OP3): Certifications												
3.1	Certification of electronic amusement games.	•	•	•					√	√	√	Project awaiting implementation
3.2	Certification of games of chance played on VLT gaming machines	•	•	•					√	√	√	Project awaiting implementation
3.3	Certification of casino gambling and the relevant machines.	•	•	•		√	√	√	√	√	√	Ongoing project
3.4	Characterization of games played on broadcast or other media as games that involve or do not involve chance.	•	•	•		√	√	√	√	√	√	Ongoing project
3.5	Certification of gaming machines used for electronic amusement games.	•	•	•					√	√	√	Project awaiting implementation
3.6	Certification of VLT gaming machines.	•	•	•					√	√	√	Project awaiting implementation
3.7	Certification of premises operating electronic amusement games played on gaming machines	•	•	•					√	√	√	Project awaiting implementation
3.8	Certification of premises operating games of chance played on VLT gaming machines.	•	•	•					√	√	√	Project awaiting implementation
3.9	Certification of Manufacturers of games of chance and gaming machines.	•	•	•						√	√	Project awaiting implementation
3.10	Certification of Importers of games of chance and gaming machines.	•	•	•						√	√	Project awaiting implementation

2014 OPERATIONAL PLAN												
PROJ CT CODE	PROJECT TITLE	Strategic Goals (SG)				2013	2014 (per quarter)				2015	PROJECT IMPLEMENTATION STAGES
		1	2	3	4		a	b	c	d		
3.11	Certification of Technicians of electronic amusement games and gaming machines	•	•	•					√	√	√	Project awaiting implementation
3.12	Certification of Technicians of games of chance and gaming machines.	•	•	•					√	√	√	Project awaiting implementation
3.13	Definition of Fees and Charges for the operation of games of chance played on VLT gaming machines.	•	•	•		√	√					New project Completed
Operational Priority (OP 4): Development and implementation of a compliance inspection mechanism for the gaming market												
4.1	Drafting a manual on compliance Inspection procedures for electronic amusement games played on gaming machines.	•	•			√	√	√				Ongoing project
4.2	Drafting a manual on compliance inspection procedures for online gambling.	•	•			√	√	√				Ongoing project
4.3	Drafting a manual on compliance inspection procedures for games of chance played on gaming machines.	•	•			√	√	√				Ongoing project
4.4	Drafting a manual on compliance inspection procedures for OPAP S.A. and its retailers.	•	•			√	√	√				New project Ongoing
4.5	Drafting a manual on compliance inspection procedures for games of chance operated by OPAP S.A.	•	•			√	√	√	√	√		Ongoing project
4.6	Drafting a manual on compliance inspection procedures for casino gambling.	•	•			√	√	√	√	√		Ongoing project
4.7	Drafting a manual on compliance inspection procedures for games of chance on broadcast media.	•	•			√	√	√				Ongoing project
4.8	Drafting a manual on compliance inspection procedures for commercial communications.	•	•	•				√	√	√	√	Project awaiting implementation
4.9	Staffing of the Gaming Inspectors' Register.		•	•		√	√	√	√	√		Ongoing project
4.10	Compliance inspection of online gambling.		•	•		√	√	√	√	√	√	Ongoing project
4.11	Compliance inspection of games of chance operated by OPAP S.A.		•	•					√	√	√	Project awaiting implementation
4.12	Compliance inspection of games of chance operated by HELLENIC LOTTERIES S.A.		•	•					√	√	√	Project awaiting implementation

2014 OPERATIONAL PLAN												
PROJ CT CODE	PROJECT TITLE	Strategic Goals (SG)				2013	2014 (per quarter)				2015	PROJECT IMPLEMENTATION STAGES
		1	2	3	4		a	b	c	d		
4.13	Compliance inspection of mutual horse race betting.		•	•							√	Project awaiting implementation
4.14	Compliance Inspection of casino gambling.		•	•		√	√	√	√	√	√	Ongoing project
4.15	Compliance Inspection of games of chance played on VLT gaming machines.		•	•					√	√	√	Project awaiting implementation
4.16	Compliance inspection of gambling on broadcast media.		•	•					√	√	√	Project awaiting implementation
4.17	Compliance inspection of amusement games played on gaming machines.		•	•					√	√	√	Project awaiting implementation
4.18	Inspection of compliance with the rules on commercial communications.	•	•	•						√	√	Project awaiting implementation
4.19	Compliance inspection of online amusement games.		•	•							√	Project awaiting implementation
4.20	Drafting a manual on the General Principles of Compliance Inspection	•	•			√	√	√				New project Ongoing
4.21	Drafting a manual on compliance inspection procedures for mutual horse race betting.	•	•							√	√	New project awaiting implementation
4.22	Drafting a manual on compliance inspection procedures followed by HELLENIC LOTTERIES S.A. and retailers.	•	•				√	√				New project Ongoing
4.23	Drafting a manual on compliance inspection procedures for lotteries.	•	•			√	√	√	√	√		New project Ongoing
4.24	Drafting a manual on compliance Inspection procedures for online amusement games.	•	•			√	√	√				New project Ongoing
Operational Priority (OP 5): Development of an action plan for protection of the public at large and vulnerable groups												
5.1	Problem gambling prevalence study.			•		√	√	√	√	√		Ongoing project

2014 OPERATIONAL PLAN												
PROJE CT CODE	PROJECT TITLE	Strategic Goals (SG)				2013	2014 (per quarter)				2015	PROJECT IMPLEMENTATION STAGES
		1	2	3	4		a	b	c	d		
5.2	Development of an online interactive application used to inform players and raise awareness as regards responsible gaming. ²⁷			•			√	√	√	√		Project awaiting implementation
5.3	Drafting a code of conduct on minors and responsible gaming.			•			√					Project awaiting implementation
5.4	Development and promotion of synergies with other bodies as regards protection of the public and control of addiction. ²⁸			•		√	√	√	√	√	√	Ongoing project
5.5	Actions for the prevention and control of problem gambling. ²⁹			•		√	√	√	√	√	√	Ongoing project
5.6	Planning and implementation of thematic training actions (per target group and training need) related to the goals falling under this priority. ³⁰			•		√	√	√	√	√	√	Ongoing project
5.7	Planning and implementation of actions to inform and raise public awareness in relation to the goals falling under this priority. ³¹			•		√	√	√	√	√	√	Ongoing project
5.8	Representation of the HGC in an EU Group of Experts.	•	•	•		√	√	√	√	√	√	New project Ongoing
5.9	Cooperation with equivalent authorities and agencies abroad.	•	•	•		√	√	√	√	√	√	New project Ongoing
Operational Priority (OP 6): Development and implementation of the statutory framework of operation of the HGC												
6.1	Drafting a Regulation on the Organization, Operation and Structure of the HGC.				•	√						Completed
6.2	Drafting a Regulation on Financial Operation and Management.				•	√						Completed

²⁷ Project 5.2 is analyzed into two individual actions for the year 2014:

(i) "Development of an online interactive training application used to inform players ("online tool"), which is expected to start in February and be concluded in April 2014.

(ii) "Development of an online tool-quiz for responsible gaming", which is expected to start in August and be concluded in October 2014.

²⁸ Project 5.4 is analyzed into the following action for the year 2014: "Cooperation with bodies active in the field of problem gambling in order to design and reproduce information material".

²⁹ Project 5.5 is analyzed into the following action for the year 2014: "Cooperation with State authorities active in the field of gambling for research, prevention and educational purposes".

³⁰ Project 5.6 is analyzed into the following action for the year 2014: "Information, discussion, training and prevention workshops on the concepts of chance, odds and the illusion of being in control of the problem, as well as the risks from excessive use of games of chance".

³¹ Project 5.7 is analyzed into the following action for the year 2014: "Development of web-based audiovisual material for the HGC website"

2014 OPERATIONAL PLAN												
PROJ CT CODE	PROJECT TITLE	Strategic Goals (SG)				2013	2014 (per quarter)				2015	PROJECT IMPLEMENTATION STAGES
		1	2	3	4		a	b	c	d		
6.3	Drafting a Regulation on the purchase of goods and services, and leases.				•	√	√					Completed
6.4	Drafting a Regulation on Studies and Projects.				•	√	√					Completed
6.5	Drafting a Regulation on Travel.				•	√	√					Completed
6.6	Drafting a Staff Regulation.				•	√	√	√	√			Ongoing project
6.7	Drafting a Regulation on the Code of Conduct for the Members and Staff of the HGC.				•	√	√					Completed
6.8	Codification of gaming laws.				•	√	√	√	√	√		Ongoing project
Operational Priority (OP 7): Development of the systems of organization and operation of the HGC												
7.1	Setting up a performance evaluation System.				•	√	√	√				Ongoing project
7.2	Setting up a monitoring system for the HGC Strategic Plan and Operational Plan.				•	√	√	√	√			Ongoing project
7.3	Setting up a System for the drafting of the HGC Annual Budget and Annual Report.				•	√	√	√	√			Ongoing project
7.4	Setting up an internal communication and external electronic communication system for the HGC.		•	•	•	√						Completed
7.5	Setting up a quality management system (ELOT EN ISO 9001).				•	√	√	√	√	√	√	Ongoing project
7.6	Setting up a database for the international regulatory framework.				•	√						Completed
7.7	Education and training of the staff: analysis of needs.	•	•	•	•	√	√	√	√	√	√	Ongoing project
7.8	Education and training of the staff: planning and implementation of actions.	•	•	•	•	√	√	√	√	√	√	Ongoing project
7.9	Setting up a system for the monitoring and management of the financial and physical scope of training and information events.				•	√						Completed
7.10	Communication plan of the HGC. ³²	•	•	•	•	√	√	√	√	√	√	Ongoing project

³² The main actions of project 7.10, which will be concluded by the end of 2014, are analyzed into the projects with code 7.20 to 7.25.

2014 OPERATIONAL PLAN												
PROJECT CODE	PROJECT TITLE	Strategic Goals (SG)				2013	2014 (per quarter)				2015	PROJECT IMPLEMENTATION STAGES
		1	2	3	4		a	b	c	d		
7.11	Creation of a data center.		•	•	•	√	√	√	√	√	√	Ongoing project
7.12	Development of an IT system to support processes, licensing, certification and compliance inspection and to monitor the relevant registers.	•	•		•	√	√	√	√			Ongoing project
7.13	Purchase of ICT equipment.				•	√	√	√	√			Ongoing project
7.14	Purchase of office equipment.				•	√						Completed
7.15	Development of an IT system for supervision and compliance inspection (ITSCI).		•	•	•	√	√	√	√	√	√	Ongoing project
7.16	Finding premises for the HGC.				•	√						Completed
7.17	Staffing of the HGC.				•	√	√	√	√	√	√	Ongoing project
7.18	Setting up a system for the drafting of the HGC annual report.				•			√	√	√		New project awaiting implementation
7.19	Setting up a Security Techniques System (ELOT EN ISO 27000).				•				√	√	√	New project awaiting implementation
7.20	Redesigning the HGC website.	•	•	•	•	√	√	√	√	√		New project Ongoing
7.21	Development and management of social networks and media.	•	•	•	•	√	√	√	√	√		New project Ongoing
7.22	Drafting a list of accredited journalists.	•	•	•	•	√	√	√	√	√		New project Ongoing
7.23	Creation of a Communication Identity.	•	•	•	•	√	√	√				New project Ongoing
7.24	Installing signs in the HGC premises.				•		√					New project Ongoing
7.25	Development of best Communication Practices - Communication Tools.				•		√	√				New project Ongoing

