

GOVERNMENT GAZETTE

OF THE HELLENIC REPUBLIC

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DECISIONS

No. 56580 ΕΞ 2022

Amendment and codification of Decision No. 79305/27.7.2020 issued by the Minister of Finance on the enactment of Gaming Regulations on the Suitability of Persons (3262/B Correction of Errors 4441/B).

THE MINISTER OF FINANCE

Whereas:

1.The provisions of:

- a) Articles 25 to 54 (incl.) of Law 4002/2011 on Amending the state pension legislation - Reforms for development and fiscal consolidation - Issues within the remit of the Ministries of Finance, Culture & Tourism and Labour & Social Security (Government Gazette 180/A) and in particular the provisions of Article 29(3) as well as those of Articles 189 to 203 of Law 4635/2019 on Investing in Greece and other provisions (Government Gazette 167/A);
- b) Articles 13, 18, 19 and 41 of Law 4622/2019 on the Executive State: organisation, operation and transparency of the Government, governmental agencies and central public administration (Government Gazette 133/A);
- c) Articles 357 to 378 of Law 4512/2018 on Arrangements for the implementation of the Structural Reforms of the Economic Adjustment Programme and other provisions (Government Gazette 5/A);
- d) Article 34(8) of Law 4223/2013 on Uniform property tax and other provisions (Government Gazette 287/A);
- e) Article 23(8) of Law 4141/2013 on Investment development tools, credit facilities and other provisions (Government Gazette 81/A);
- f) Law 3469/2006 on the National Printing Office, Government Gazette and other provisions (Government Gazette 131/A) and Law 4727/2020 on Digital Governance (incorporation of Directive (EU) 2016/2102 and of Directive (EU) 2019/1024 on Electronic Communications into the national law (Incorporation of Directive (EU) 2018/1972 into the national law) and other provisions, as far as Chapter 11 on Government Transparency- the “Diavgeia” programme (Government Gazette 184/A);
- g) Law 3707/2008 Regulating issues concerning private security firms and private investigation offices (Government Gazette 209/A);
- h) Articles 16 to 23 (incl.) of Law 3229/2004 on the Supervision of private insurance, supervision and control of games of chance, implementation of the International Accounting Standards and other provisions (Government Gazette 38/A) and, in supplement, the provisions of Law 3051/2002 (Government Gazette 220/A) on Constitutionally-established independent authorities, amendment and supplementation of the public sector recruitment system and related regulations;
- i) Law 2518/1997 on Conditions for the operation of private security firms. Qualifications and obligations of staff and other provisions (Government Gazette 164/A);

- j) Article 4(1), (2) and (4) of Law 2206/1994 on the Establishment, organisation, operation and control of casinos and other provisions (Government Gazette 62/A);
 - k) Article 8(4) of Law 1599/1986 on the Relations between the state and citizens, establishment of a new type of ID Card and other provisions (Government Gazette 75/A);
 - l) Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (L 119) and Law 4624/2019 (Government Gazette 137/A);
 - m) Presidential Decree No. 83/2019 on the appointment of Deputy Prime Minister, Ministers, Deputy Ministers and Ministers of State (Government Gazette 121/A);
 - n) Presidential Decree No. 81/2018 on the Transposition of Directive (EU) 2015/1535 of the European Parliament and of the Council of 9 September 2015 (OJ L 241, 17.9.2015, p. 1) laying down a procedure for the provision of information in the field of technical regulations and of rules on Information Society services (codification) and other provisions (Government Gazette 151/A) into Greek law;
 - o) Article 34 of Presidential Decree No. 142/2017 on the Organisational structure of the Ministry of Finance (Government Gazette 181/A);
 - p) Article 90 of Presidential Decree No. 63/2005 on the Codification of the legislation on Government and governmental agencies (Government Gazette 98/A) as in force;
 - q) Joint Decision No. 56660/1679/22.12.2011 of the Ministers of Finance and Culture & Tourism confirming the Hellenic Gaming Commission (HGC) Certification for commencement of operation (Government Gazette 2910/B);
 - r) Decision No. 145940/ΕΞ 2020/21.12.2020 issued by the Minister of Finance (ΥΟΔΔ 1089) read in conjunction with similar decisions nos 2/3935/0004/24.7.2018 (ΥΟΔΔ 428), 9433 ΕΞ 2019/12.2.2019 (ΥΟΔΔ 64), 3557 ΕΞ 2020/14.01.2020 (ΥΟΔΔ 20) on the establishment of the HGC;
 - s) Sole article of the HGC Decision No. 106/6/23.5.2014 defining the conditions to be met by independent, specialised laboratories or certification bodies in order for their certifications to be accepted by the HGC (Government Gazette 1432/B);
 - t) Articles 23, 25, 26, 27, 28 and 33 of Decision No T/6736/2003 of the Minister of Development on the Regulations for the administrative audit and supervision of casino operations (Government Gazette 929/B), as amended with HGC Decision No. 303/5/27.02.2018 on the Amendment and codification of Decision No. T/6736/2003 (Government Gazette 929/B) of the Minister of Development entitled "Regulations for the administrative control and supervision of casino operations" as in force (Government Gazette 1025/B);
 - u) HGC Decision No. 115/4A/11.7.2014 amending and codifying HGC Decision No. 107/5/30.05.2014 (Government Gazette 1637/A) regulating issues relating to the certification of technicians of electronic technical - leisure games and gaming machines and of technicians of games of chance and VLT gaming machines as well as to the preparation of the relevant registers (Government Gazette 2045/B);
 - v) Decision No. 79305 ΕΞ 2020/23.7.2020 issued by the Minister of Finance on the enactment of the Gaming (Suitability of Persons) Regulations (3262/B Correction of Errors 4441/B);
 - w) Decision No. 125944 ΕΞ 2020/04.11.2020 issued by the Minister of Finance on the enactment of the Gaming Regulation on Administrative Measures and Sanctions (Government Gazette 4884/B);
- 2.The fact that on pages 137-138 of the explanatory memorandum of Law 4635/2019 (Government Gazette 167/A) it is stated inter alia that the Gaming Regulation may be adopted by one or more decisions issued by the Minister of Finance acting on a recommendation from the HGC;

3. A study submitted on 3 March 2021 (Ref. No. 2394/3.3.2021) on estimating the range of fees to be paid for the examination of the applications, for the granting of licences as well as the annual fees for maintaining entries of Suitability Licences in the HGC register;
- 4.No. 2020/113/GR Draft Ministerial Decision on the enactment of the Gaming (Suitability of Persons) Regulations pursuant to the provisions of Presidential Decree No. 81/2018 (Government Gazette 151/A) with the standstill period ending on 12 June 2020. No comments/remarks are to be submitted;
5. HGC Decision No. 549/6β/26.03.2021 suggesting to the Minister of Finance the adoption of a Decision amending and codifying No. 79305 ΕΞ 2020/23.7.2020 (Government Gazette 3262/B) on the enactment of the Gaming (Suitability of Persons) Regulations, pursuant to Article 29(3) of Law 4002/2011 (Government Gazette 180/A) read in conjunction with HGC document No. οικ. 16745/16.11.2021 on updated draft provisions on the HGC's proposals regarding the adoption of a decision amending the Gaming (Suitability of Persons) Regulations as well as the Organisation and Running of online Games of Chance;
6. The need to amend and codify regulations on the assessment of the Suitability of Persons who organize and run games;
7. The fact that any amendments introduced by this Decision shall neither extend and/or already existing restrictions or introduce new restrictions, obstacles or prohibitions with regard to the terms and conditions for the granting of Suitability Licences in order for the Games to be organized and conducted, already notified to the European Commission under Code No. 2020/0113/GR NOTIF., pursuant to Presidential Decree No. 81/2018 (Government Gazette 151/A);
8. The fact that this decision does not place a financial burden on the State budget or the HGC budget, we hereby decide:

To amend and codify Decision No. 79305 ΕΞ 2020/23.7.2020 issued by the Minister of Finance on the enactment of Gaming Regulations on the Suitability of Persons (3262/B Correction of Errors 4441/B), as follows:

GAMING (SUITABILITY OF PERSONS) REGULATIONS

Article 1

DEFINITIONS

For the purposes of this decision, the following words or phrases shall have the following meaning:

Licence is the granting of a right to run Games of Chance in any manner by the Greek State to a third party either by tender process or in any other lawful manner, irrespective of the medium, time, manner and network for the provision, marketing and distribution of the relevant services to organise and run games and the administrative permit issued by the HGC for the running and/or organisation of Games.

Suitability Licence (SL) means the decision approving a person's suitability in accordance with these Regulations.

HGC or Authority is the Hellenic Gaming Commission.

Suitability Card means the card issued by the HGC or the Licence Holder, where required, for persons whose Suitability has been ascertained.

Running means running a game referred to in Article 25(s) of Law 4002/2011 (Government Gazette 180/A). Where the provisions of this Decision, which refer to the concept of 'Running' shall also cover the concept of 'Organising' and vice versa.

Organising means organising a game referred to in Article 25(t) of Law 4002/2011 (Government Gazette 180/A).

Where the provisions of this Decision refer to the concept of 'Organising' it shall also cover to the concept of 'Running' and vice versa.

Special premises (studio) means premises located within the EU or the EEA where a person holding a relevant Licence issued by a competent EU or EEA regulatory authority installs equipment and infrastructure for running Other Online Games played with a live dealer, whose results are not generated using a Random Number Generator.

Importer or Supplier means the person who supplies, sells, resells, lets out, promotes, offers and in any way makes available to a Licence Holder Technical Means and Materials for running Games, and has been granted a Suitability Permit by the HGC to that purpose.

Regulations shall mean this decision.

Suitability shall mean the finding made by the HGC or the Licence Holder concerning the qualifications and conditions for the issuing of a Suitability Licence and/or Suitability Card in accordance with the provisions of these Regulations. To ascertain Suitability, the HGC shall among other things examine information relating to the identity, place of establishment, background, criminal record, organisation, operation and lawful presence in general and business activities of the person applying for a Suitability Licence.

Manufacturer shall mean the person who manufactures (including designs, plans, assembles, produces and programs Technical Means and Materials) and who in any manner makes available to the Licence Holder any Technical Means and Materials, and who has been granted a Suitability Licence by the HGC as well as the person who holds a Studio Licence.

Licence Holder or Holder shall mean the persons to whom a licence has been granted.

Key Functions shall mean the functions/duties relating to the organisation, coordination, oversight and control of specific sectors and/or functional areas in the Running of Games which are performed by managers or their deputies, in accordance with the provisions of these Regulations.

Other Online Games, in accordance with Article 25(v) of Law 4002/2011 (Government Gazette 180/A) means casino games of chance, poker and its variants, provided online and played either live or using a Random Number Generator.

Register shall mean all data held by the HGC on the holders of Suitability Licences.

Certification Body means the certification body which operates a specialised Test Lab and has been recognised by the HGC in accordance with Article 16, or a certification body accredited in accordance with the applicable European and/or international standards, by the Hellenic Accreditation System S.A. or by accreditation bodies in other countries, with which the Hellenic Accreditation System S.A. has signed a mutual recognition agreement.

Game means any game of chance, the supervision and control of which fall within the remit of the HGC.

Player means the natural person participating lawfully in games.

Regulatory Framework means the Regulations and all legislative and other regulatory provisions, as well as the terms contained in licences, laying down the conditions for lawfully organising and running Games within the territory of Greece.

Junket Operator shall mean any person, whether Greek or foreign, who collaborates with Licensed Casinos to promote the ability to play games and to attract customers, who is paid by the Licensed Casinos based on the participation levels of customers attracted to the venue in the games it runs, and who has been granted a Suitability Licence by the HGC for that purpose.

Technician shall mean the person who provides repair and maintenance services for Technical Means and Materials and has been granted a Suitability Licence by the HGC for that purpose.

Technical Means and Materials for playing Games shall mean the certified (where necessary) means/materials/electronic/mechanical/electromechanical device and electronic program (all manner of software or computer system) used directly or indirectly to organise and run Games which is related to and/or affects and/or determines and/or monitors and/or records the outcome of the Game or the playing of the Games in general.

Technical Specifications shall mean the specifications for software, hardware, networks, systems and other gaming equipment laid down in the Gaming Regulations.

Game of Chance shall mean a game which has the features set out in Article 25(b) of Law 4002/2011 (Government Gazette 180/A) which is run by the Licence Holder.

Article 2

SCOPE – GENERAL PRINCIPLES

2.1. This Regulation shall apply to Licence Holders and applicants for a Suitability Licence pursuant to the relevant Regulations regarding Games:

- a) organised and run online;
- b) organised and run via broadcasting and telecommunications media;
- c) organised and run by OPAP S.A;
- d) organised and run by casinos;
- e) which are State lotteries;
- f) which are horse-races, whether sweepstake or not; and
- g) any other game, supervision and audit on the organisation and/or running thereof is performed by the HGC.

2.2. The documents specified in these Regulations shall in the first place be exchanged in hard copy. The HGC reserves the right to apply an electronic administration system.

2.3. Where an application for the granting of a Suitability Licence or withdrawal of an existing one is rejected for any reason, fees and duties which have been paid in accordance with the relevant Regulation shall not be refunded.

2.4. When examining an application, the HGC may, for the purpose of checking the accuracy, completeness and authenticity of the particulars and the supporting documents submitted, request that the applicant or any other body and authority of the public and private sector, in Greece and abroad, provide any data, information or document considered necessary for the forming of its opinion. With their application form, applicants shall unreservedly give their full consent to the processing of their personal information and data by the HGC, including making available to the Authority and/or allowing verification of said data and information by third parties. Where the relevant certificates and entries are kept on registers which are electronically available, the applicant shall be released from the obligation to submit them and can provide the URL where the data has been posted, along with the search codes, if needed, to access and retrieve the data. The Authority shall verify, wholly or by way of a sample, the accuracy of the particulars accompanying the application for the granting of a Suitability Licence. The HGC may at any time carry out an ex officio check to verify whether the terms and conditions for the granting of a Suitability Licence and all authorisations specified in the relevant Regulations are met.

2.5. When examining applications for the granting of Suitability Licences, the HGC shall take into account any information which has come to its attention from the competent prosecution and judicial authorities

concerning cases which involve the applicants or for which they are being prosecuted, and may after prior hearing of the applicant, reject the application for a Suitability Licence on these grounds.

2.6. Authorisations and Suitability Licences granted shall not under any circumstances amend or repeal other applicable provisions on the granting of licences and shall not take precedence over them.

2.7. Where the person applying for a Suitability Licence has its registered offices/domicile abroad, documents equivalent to those required by the Regulations from a competent authority of the country of establishment, duly certified and translated into Greek, shall be submitted.

2.8. Entry of these persons in the registers specified in the Regulations shall not release them from their obligations under Article 52A(4) and (5) of Law 4002/2011 (Government Gazette 180/A), relating to the import and/or trade of all manner of equipment for the running of games of chance.

2.9. Manufacturers, Importers-Suppliers, Technicians and Junket Operators may use the HGC logo in their commercial documentation and commercial communications under the terms, conditions and specifications laid down by the Authority.

2.10. The HGC shall specify and adjust, as appropriate, the content of the Suitability Licence application, the time and manner of its submission, the information required and all other necessary modalities.

2.11. The HGC may, where it considers it necessary, invite the applicant to a personal interview to ascertain their Suitability.

2.12. The terms and conditions under which the Suitability Licence was issued must be fulfilled throughout the entire time the Suitability Licence is valid. The HGC shall carry out checks to verify whether the terms and conditions of the Suitability Licence are met and should any offences have been committed, withdrawal of the Suitability Licence shall follow.

2.13. Holders of Suitability Licences are not permitted to participate in Games of Chance run by the Licence Holder in which they are shareholders/partners or to whom they provide their services.

2.14. Holders of Suitability Licences are not allowed to manufacture, import, supply and in general make available Technical Means and Materials and Studios and/or to provide services under any relationship to non-Licence Holders. To that end, prior to making said Technical Means and Materials and/or Studios available and providing services, they are obliged to verify using all appropriate means that the person to whom the above are to be made available and/or to whom services are to be provided is a Licence Holder.

2.15. The Suitability Licences issued in accordance with the provisions of these Regulations shall be valid until they expire or are withdrawn. Holders of Suitability Licences shall notify the HGC of any change in the particulars and supporting documents on the basis of which the Suitability Licence was issued, in accordance with the appropriate provisions of the relevant Regulation.

2.16. Licence Holders shall provide for and implement adequate and effective procedures to check compliance with the conditions required for the granting of Suitability Licences to the persons referred to in Articles 6 to 11 (incl.) and shall notify the HGC of any change in the particulars and supporting documents on the basis of which the Suitability Licence was issued, once they become aware of them.

2.17. The Suitability Licence shall be withdrawn where it is found that the conditions for granting a Suitability Licence are not met or the fees specified in the relevant Regulation, required to maintain the holders' entry in the register, have not been paid.

2.18. Licence Holders shall provide for and implement suitable procedures so that when they perform their duties there is no risk to the lawful organisation and running of Games, or to public safety and public health, thus ensuring compliance with the Principles of Responsible Gaming.

2.19. The provisions of Article 23(8) of Law 4141/2013 (Government Gazette 81/A) shall apply to the granting of Suitability Licences.

2.20. The provisions hereof shall also apply to persons to whom the Licensed Casino delegates tasks relating to the development and running of the casino in accordance with the provisions of Article 357(6)(b) of Law 4512/2018 (Government Gazette 5/A).

2.21. CVs required under the provisions hereof shall be submitted either in Greek or in English.

Article 3

SUITABILITY OF SHAREHOLDERS – PARTNERS IN THE GAME OF CHANCE LICENCE HOLDERS

3.1. The HGC shall ascertain the Suitability of the holders of shares or units, or partners, who directly or indirectly hold more than 10% of the share capital or voting rights or units or equivalent equity interests in the Licence Holder, and enter said persons in the relevant Register.

3.2. In the case of joint stock companies, indirect holding means possession and control of shares, units or voting rights or equivalent equity interests in the Licence Holder by any person entitled to acquire, hold or exercise voting rights in any of the following cases or combinations thereof:

- a) via related undertakings;
- b) via a third party who holds voting rights in the Licence Holder, with whom said person has entered into an agreement whereby the parties are required, by means of the coordinated exercise of the voting rights they hold, to adopt at all times a common policy on the management of the Licence Holder or of its parent company, or where pursuant to an agreement the exercise of voting rights through them has been transferred;
- c) where voting rights incorporated in shares have been provided as collateral and are exercised by a third party or are rendered by reason of usufruct to a third party;
- d) where the voting rights held or which may be exercised within the meaning of points (a) to (c) are exercised by an undertaking controlled by a third party; and
- e) any other case in which the voting rights held by a person in his or her name are exercised for the account of or in accordance with the instructions given by a third party.

3.3. In case the persons referred to in paragraph 3.1 are legal persons, the HGC shall check the natural persons who manage them, and the shareholders or holders of units in the companies or equivalent equity interests, who hold the percentage referred to in paragraph 3.1 and in all events the beneficial owner thereof, and may request information on the Suitability of both the management team and the main shareholders, holders of units in the company or equivalent equity interests in legal persons, down to the level of natural person, depending on the legal form and the type of shareholder or partner, where it considers it necessary to form an opinion on the Suitability the said persons.

3.4. In the case of institutional investors from Greece or abroad, the HGC shall only check Suitability of the natural persons who manage the institutional investor.

3.5. The Licence Holder shall submit a relevant application to the HGC in order for the Suitability of the persons referred to in this Article to be ascertained. This application shall serve as a declaration on honour under Article 8(4) of Law 1599/1986 (Government Gazette 75/A) that all information included therein, as well as the information accompanying it, is true and accurate and it shall be accompanied by a dossier which includes the following information and supporting documents:

3.5.1. In the case of natural persons:

- a) a curriculum vitae;
- b) a copy of the criminal record;
- c) professional licences (if applicable);

- d) certificates of entry in professional registers (if any);
- e) certificates of employment from past employers (if any); and
- f) a declaration on honour from the applicant, certified for the authenticity of the signature, declaring that:

aa) they have not been convicted by a final court ruling of a felony or been subject to a penalty for theft, embezzlement, fraud, breach of trust, acceptance and disposal of the proceeds of criminal activities, extortion, forgery, active or passive bribery, grievous or actual bodily harm, concealing a crime, crimes relating to currency, crimes which are commonly considered dangerous, crimes against personal freedom, sexual offences, sexual exploitation offences, or for a crime specified in the legislation on narcotics, weapons, explosives or tax evasion, in Greece or abroad.

bb) they have not been convicted by a final court ruling of crimes relating to the wider financial sector and of crimes specified in the laws on games of chance, in Greece or abroad.

cc) no administrative sanction for breaches of the legislation in the wider financial sector in Greece or abroad has been imposed on them.

dd) There are no proceedings pending against them for offences and crimes referred to in points (aa), (bb) and (cc) either in Greece or abroad, in the case of a Licensed Casino.

ee) the authorisation or professional permit they hold has not been withdrawn by another regulatory authority or governmental body or service.

ff) they were not the CEO, administrator, partner or member of the board of directors of a gambling company which was declared bankrupt or being forced to wind up, not in receivership, have not entered an arrangement with creditors or are in any analogous situation and were not the subject of proceedings concerning those matters or were in any similar situation, within three (3) months prior to the end of the legal relationship.

gg) they were not the CEO, administrator, partner or member of the board of directors of a gambling company whose licence was permanently withdrawn by the competent regulatory authority or other competent supervisory body while the legal relationship with the gambling Licence Holder was in effect, within three (3) months prior to the end of the legal relationship.

hh) they unreservedly give their full consent to the processing of their personal information and data by the HGC, including making available to the Authority and/or allowing verification of said data and information by third parties.

Where the person for whom the application is submitted falls into any of the cases referred to in points (bb) to (gg), they must necessarily declare the situation they are in and submit any information in their possession. The Licence Holder shall request the HGC to examine whether, despite said situation, it could approve the application since the situation of the person on behalf of which the application is submitted does not put the lawful and transparent running of the Games at risk.

- g) Authorisation to sign and submit the application to the Licence Holder.

3.5.2. When the application relates to a legal person the following supporting documents and information shall be also submitted:

- a) depending on the applicant's legal form and the laws of its country of establishment, the applicant's incorporation and lawful operating documents;
- b) a decision on the official establishment of the Board of Directors;
- c) minutes of the Board of Directors or the document conferring powers of representation for the legal person;

- d) a list of shareholders, partners, unit holders or persons with equivalent equity interests, identifying the beneficial owner, for interests of over 10%;
- e) in the case of members of the Board of Directors, partners and persons managing and administering the shareholder, as appropriate, the supporting documents referred to in points (a) to (f) of paragraph 3.5.1;
- f) a certificate issued by the competent authority confirming that the applicant is not bankrupt or being forced to wind up, not in receivership, has not entered an arrangement with creditors or is in any analogous situation and is not the subject of proceedings concerning those matters or in any similar situation.

In particular, if the person for whom the application is submitted is established in Greece, the certificates that said person is not bankrupt, has not entered an arrangement with creditors or is not in receivership, or has not undergone a consolidation process, shall be issued by the competent court of first instance of the person's seat. The certificate that the legal person has not been forced to wind up by court order shall be issued by the relevant court of first instance of the person's seat and the certificate that has not been forced to wind up by decision of the partners shall be issued by the General Commercial Register pursuant to the applicable provisions.

- g) a brief presentation of the legal person.

3.5.3. Any other additional information the HGC deems necessary to be submitted in order to evaluate Suitability criteria for persons for whom an application has been submitted, pursuant to the provisions of Article 40(2), (2a) and (3) of Law 4002/2011 (Government Gazette 180/A), Article 365 of Law 4512/2018 (Government Gazette 5/A) and of this Article.

3.6. The HGC shall check the natural persons who manage the above legal persons and their main shareholders or partners, and may request information on the Suitability of both the management team and the main partners of the legal persons, down to the level of natural person, depending on the legal form and the type of shareholder, where it considers it necessary for its judgement as to the Suitability of the shareholders.

3.7. Where legal conditions are met, the HGC shall approve Suitability and enter the shareholders, unit holders, partners or holders of such equivalent equity interests in the relevant Register.

3.8. The Licence Holder shall inform the HGC of any change, particularly when the change relates to the particulars submitted along with the application, which directly or indirectly relates to the approval of the Suitability of the persons referred to in this Article, within twenty (20) days as of the date on which the change occurred, and shall submit along with the notice all information and supporting documents referred to in paragraph 3.5 necessary to document said change.

3.9. Shareholders, unit holders or partners or holders of equivalent equity interests in the Licence Holder shall be obliged to disclose to the Licence Holder any change in the particulars on the basis of which their Suitability was approved, within five (5) days as of the date on which said change occurred.

3.10. The HGC may issue a decision pursuant to Article 365(11) of Law 4512/2018 (Government Gazette 5/A) setting out in detail and regulating specific matters and modalities to give effect to this Article, in relation to the Suitability of shareholders or of equivalent equity interests in Licensed Casinos.

Article 4

TRANSFER OF SHARES – UNITS OR EQUIVALENT EQUITY INTERESTS IN THE GAME OF CHANCE LICENCE HOLDER

4.1. Any disposal or acquisition of shares or units or equivalent equity interests in the Licence Holder shall be done either in accordance with the provisions of Article 40(2) and (2a) of Law 4002/2011 (Government Gazette 180/A) read in conjunction with Article 34(8) of Law 4223/2013 (Government Gazette 287/A) and

Article 47(1) and (2) of Law 4002/2011 (Government Gazette 180/A) or pursuant to Article 373 of Law 4512/2018 (Government Gazette 5/A), as appropriate.

4.2. Where there is an intention to dispose of or acquire shares or units or equivalent equity interests in the Licence Holder, which entails a direct or indirect change in the audit process of the Licence Holder, the provisions of Article 40(2) and (2a) of Law 4002/2011 (Government Gazette 180/A) read in conjunction with Article 34(8) of Law 4223/2013 (Government Gazette 287/A) and Article 47(1) and (2) of Law 4002/2011 (Government Gazette 180/A) or Article 373 of Law 4512/2018 (Government Gazette 5/A), as appropriate, shall apply.

4.3. In all cases where under relevant provisions approval of the HGC is required, the Licence Holder or persons who upon acquisition of shares, units or equivalent equity interests, intend to acquire direct or indirect control of the Licence Holder, shall submit a relevant application to the HGC accompanied by the supporting documents specified in Article 3.

Article 5

KEY FUNCTIONS

5.1. The Licence Holder's Key Functions in organising and running Games of Chance shall be performed by the following mentioned persons:

- a) members of Board of Directors;
- b) the Chief Executive Officer, executive directors, administrators;
- c) the Gaming Operations Officer;
- d) the Regulatory Compliance Officer;
- e) the Head of Finance and Accounting;
- f) the Head of Commercial Policy and Commercial Communications (marketing/advertising);
- g) the Head of Customer Service and Support;
- h) the Head of Information and Communication Technologies;
- i) the Anti-Money Laundering/Terrorist Financing (AML/FT) Compliance Officer;
- j) the Risk Management and Fraud Prevention Officer;
- k) the Head of Internal Audit; and
- l) the Head of Logistics and Human Resources Management.

5.2. In the case of a licensed casino, the Key Functions, in addition to those cited in paragraph 5.1, shall also be performed by the following natural persons:

- a) the Head of Security, Audit and Supervision;
- b) the Gaming Staff Management and Supervision Officer; and
- c) the Games of Chance Technical Means and Materials Management and Maintenance Officer.

5.3. Persons who perform Key Functions shall also include the executives who by virtue of their appointment or de facto perform the duties of said persons and in general any person who performs duties and exercises powers similar or analogous to those mentioned above.

Article 6

SUITABILITY LICENCE FOR PERSONS WHO PERFORM KEY FUNCTIONS

6.1. Persons who perform Key Functions must have the integrity, training, experience and level of knowledge needed to be able to effectively perform their duties when organising and running Games of Chance.

6.2. In order for a person who performs Key Functions to obtain a Suitability Licence, they must have the qualifications which enable them to be deemed suitable to perform the Key Functions for which they have been selected, taking into account their education and training qualifications and professional experience.

6.3. The Licence Holder shall submit a relevant application to the HGC in order for the Suitability of the persons referred to in Article 5 to be ascertained. The application shall serve as a declaration on honour under Article 8(4) of Law 1599/1986 (Government Gazette 75/A) that all information included therein, as well as the information accompanying it, is true and accurate and shall be accompanied by a dossier which includes the following information and supporting documents:

- a) a description of the Key Function;
- b) a curriculum vitae;
- c) a copy of the criminal record;
- d) professional licences (if applicable);
- e) certificates of entry in professional registers (if any);
- f) certificates of employment from past employers (if any);
- g) the decision appointing them or a preliminary agreement or the contract of employment or contract for work (if any); and
- h) a declaration on honour from said person, certified for the authenticity of the signature, declaring that:
 - aa) they have not been convicted by a final court ruling of a felony or been subject to a penalty for theft, embezzlement, fraud, breach of trust, acceptance and disposal of the proceeds of criminal activities, extortion, forgery, active or passive bribery, grievous or actual bodily harm, concealing a crime, crimes relating to currency, crimes which are commonly considered dangerous, crimes against personal freedom, sexual offences, sexual exploitation offences, or for a crime specified in the legislation on narcotics, weapons, explosives or tax evasion, in Greece or abroad.
 - bb) they have not been convicted by a final court ruling of crimes relating to the wider financial sector and of crimes specified in the laws on games of chance, in Greece or abroad.
 - cc) they have not been convicted by a final court ruling of crimes referred to in Article 4(1), (2) and (4) of Law 2206/1994 (Government Gazette 62/A).
 - dd) no administrative sanction for breaches of the legislation in the wider financial sector in Greece or abroad has been imposed on them.
 - ee) there are no proceedings pending against them for the offences and crimes referred to in points (aa) to (dd) (incl.), either in Greece or abroad, in the case of persons who perform Key Functions in a casino.
 - ff) No licence or authorisation granted in order to perform Key Functions has been withdrawn by any other regulatory authority or government agency or service.
 - gg) they were not the CEO, administrator, or partner of a gambling company declared bankrupt or being forced to wind up, were not in receivership, have not entered an arrangement with creditors or

were in any analogous situation and were not the subject of proceedings concerning those matters or were in any similar situation, within three (3) months prior to the end of the legal relationship.

hh) they were not the CEO, administrator, or partner of a gambling company whose licence was permanently withdrawn by the competent regulatory authority or other competent supervisory body when legal relationship with the gambling Licence Holder based on which they performed Key Functions was in effect, within three (3) months prior to the end of said legal relationship.

ii) they unreservedly give their full consent to the processing of their personal information and data by the HGC, including making available to the Authority and/or allowing verification of said data and information by third parties.

Where the person for whom the application is submitted falls into any of the cases in points (bb) to (hh), the person must necessarily declare the situation they are in and submit any information in their possession. The Licence Holder shall request the HGC to examine whether, despite said situation, it could approve the application since the situation of the person for whom the application is submitted does not put the lawful and transparent running of the Games at risk.

i) Any other additional information which the HGC deems necessary to be submitted in order to assess the Suitability of the persons referred to in Article 5, in accordance with the provisions of the Regulations.

6.4. The HGC may invite the persons in respect of which an application was submitted under this Article to a personal interview, in order to form an opinion on their Suitability.

6.5. The following amounts shall be paid in order to grant a Suitability Licence to a person who performs Key Functions, to register the Suitability Licence and maintain its validity:

a) a fee of EUR 50,00 when the application is submitted.

b) a Suitability Licence fee of EUR 50,00 per Key Function. The fee shall be paid only once on the day following reception of a notice from the HGC informing the applicant that the application has been checked and approved in principle. Failure to pay the fee shall entail rejection of the application for a Suitability Licence.

c) an annual fee of EUR 50,00 per Key Function so that the Suitability Licence maintains its validity. The annual retention fee shall be paid for the year during which the Suitability Licence is granted on the day following the relevant notice from the HGC, in which the applicant is informed that the application has been checked and approved in principle, and thereafter for each subsequent year between 1 January and the end of February of each year.

6.6. Where a person referred to in Article 5 is urgently replaced, the Licence Holder shall within ten (10) days of the replacement taking up their duties, inform the HGC of the change, the particulars of the replacement, the Key Function or Functions they perform as well as the relevant duties and competences they have assumed. The application referred to in paragraph 6.3 shall be submitted along with the notice.

6.7. The HGC shall grant the Suitability Licence after having ascertained suitability both during replacement and at the moment of approval, taking into account the reasons for which such replacement was deemed urgent as well as the Key Functions performed by said person having regard to the obligations arising from paragraph 6.5.

6.8. The persons referred to in Article 5 shall inform the HGC of any change which directly or indirectly relates to the approval of their Suitability, within twenty (20) days as of the date on which the change occurred, and shall submit along with the notice the information and supporting documents referred to in paragraph 6.3 which are necessary to document said change.

6.9. Licence Holders who perform Key Functions in a casino shall during such time as they remain in the Gaming Room, carry a card with the Suitability Licence number and logo of the company issued by the company under its own responsibility.

6.10. By a decision of the HGC, in accordance with Article 364(7) of Law 4512/2018 (Government Gazette 5/A), specific issues which are the subject matter of this Article may be specified in detail, and conditions and rules regarding the suitability of the persons who perform Key Functions at Licensed Casinos may be laid down, where this is necessary to ensure their legal functioning, and technical issues, procedures and modalities required to give effect to the provisions of this Article may be regulated.

Article 7

SUITABILITY LICENCES FOR THE ADMIN. AND OTHER STAFF OF CASINOS

7.1. The admin. and other staff (whether main or ancillary) of the Licensed casino for which a Suitability Licence must be granted by the HGC are:

- a) cashiers;
- b) staff operating the casino premises surveillance system;
- c) shift managers, pit bosses, dealers, slot managers and assistants for all the above persons;
- d) any person involved in measuring the financial results; and
- e) any person who works on the gaming computer systems.

7.2. Under this Article, Suitability Licence shall be granted to a person who has the qualifications to be deemed suitable to perform the duties for which they have been selected, taking into account their education and training qualifications and professional experience.

7.3. Said persons shall submit a relevant application to the HGC in order for the Suitability of the persons referred to in this Article to be ascertained. The application shall serve as a declaration on honour under Article 8(4) of Law 1599/1986 (Government Gazette 75/A) that all information included therein, as well as the information accompanying it, is true and accurate and it shall be accompanied by a dossier which includes the following information and supporting documents:

- a) a curriculum vitae;
- b) the post or posts for which a Suitability Licence is being requested;
- c) a copy of the criminal record;
- d) professional licences (if applicable);
- e) certificates of entry in professional registers (if any);
- f) certificates/confirmations of training/education in areas relevant to the post (if any);
- g) a declaration on honour from said person, certified for the authenticity of the signature, declaring that:
 - aa) they have not been convicted by a final court ruling of a felony or been subject to a penalty for theft, embezzlement, fraud, breach of trust, acceptance and disposal of the proceeds of criminal activities, extortion, forgery, active or passive bribery, grievous or actual bodily harm, concealing a crime, crimes relating to currency, crimes which are commonly considered dangerous, crimes against personal freedom, sexual offences, sexual exploitation offences, or for a crime specified in the legislation on narcotics, weapons, explosives or tax evasion, in Greece or abroad.
 - bb) they have not been convicted by a final court ruling of crimes relating to the wider financial sector and of crimes specified in the laws on games of chance, in Greece or abroad.

cc) they have not been convicted by a final court ruling of crimes referred to in Article 4(1), (2) and (4) of Law 2206/1994 (Government Gazette 62/A).

dd) no administrative sanction for breaches of the legislation in the wider financial sector in Greece or abroad has been imposed on them.

ee) they unreservedly give their full consent to the processing of their personal information and data by the HGC, including making available to the Authority and/or allowing verification of said data and information by third parties.

Where the applicant for the Suitability Licence falls into any of the cases referred to in points (bb) to (ee), said person must necessarily declare the situation they are in and submit any information in their possession and request the HGC to examine whether, despite said situation, it could approve the application since the situation they are in does not put the lawful and transparent running of the Games at risk.

h) Any other additional information which the HGC requests to be submitted in order to assess the Suitability of the person, in accordance with the provisions of the Regulations.

7.4. The following amounts shall be paid in order to grant a Suitability Licence to a person under this Article, to register the Suitability Licence and maintain its validity:

a) a fee of EUR 50,00 when the application is submitted.

b) a lump-sum Suitability Licence fee of EUR 50,00. The lump-sum amount shall be paid on the day following the reception of a notice from the HGC informing the applicant that the application has been checked and approved in principle. Failure to pay the lump-sum fee shall entail rejection of the application for a Suitability Licence.

7.5. Where legal conditions are met, the HGC shall grant the Suitability Licence and enter the Suitability Licence holders in the relevant Register.

7.6. Persons who provide security services under a contract with the Licence Holder shall be governed by the provisions of Law 2518/1997 (Government Gazette 164/A) and Law 3707/2008 (Government Gazette 209/A).

Article 8

SUITABILITY LICENCES FOR JUNKET OPERATORS

8.1. The persons referred to in Article 378(27) of Law 4512/2018 (Government Gazette 5/A) shall, in order to collaborate with a Licensed Casino to promote the running of Games and attract customers, be obliged to hold a Junket Operator Suitability Licence.

8.2. To obtain a junket operator Suitability Licence, the Licence Holder shall submit a relevant application to the HGC.

8.3 The application shall serve as a declaration on honour under Article 8(4) of Law 1599/1986 (Government Gazette A/75) that all information included therein as well as the information accompanying it, is true, and it shall be accompanied by a dossier which includes the following information and supporting documents:

a) a curriculum vitae;

b) a full list of the domain names for the potential junket operator, which must be exclusively owned by it, and which are to be used for commercial communications for one or more Licence Holders (if any);

c) a WHOIS certificate for the domain names;

d) a certificate on the commencement of professional/commercial activities;

- e) proof of appointment of a process agent if the potential junket operator is established abroad;
- f) a certificate issued by the competent authority confirming that the prospective junket operator is not declared bankrupt or being forced to wind up, is not in receivership, has not entered an arrangement with creditors or is not in any analogous situation and is not the subject of proceedings concerning those matters or was not in any similar situation.

In particular, if the prospective junket operator is established in Greece, the certificates that said person is not bankrupt, has not entered an arrangement with creditors or is not in receivership, or has not undergone a consolidation process, shall be issued by the competent court of first instance of the person's seat. The certificate that the legal person has not been forced to wind up by court order shall be issued by the relevant court of first instance of the person's seat and the certificate that has not been forced to wind up by decision of the partners shall be issued by the General Commercial Register in accordance with the relevant provisions in force from time to time. Natural persons or sole proprietorships need not submit certificates that they are not in liquidation.

g) Certificates of entry in professional/company registers (if any);

h) a declaration on honour from the prospective junket operator declaring that:

aa) they personally or in the case of a legal person, the persons managing, administering and/or lawfully representing the prospective junket operator, has/have not been convicted by a final court ruling of a felony or been subject to a penalty for theft, embezzlement, fraud, breach of trust, acceptance and disposal of the proceeds of criminal activities, extortion, forgery, active or passive bribery, grievous or actual bodily harm, concealing a crime, crimes relating to currency, crimes which are commonly considered dangerous, crimes against personal freedom, sexual offences, sexual exploitation offences, of for a crime specified in the legislation on narcotics, weapons, explosives or tax evasion, in Greece or abroad.

bb) they personally or in the case of a legal person, the persons managing, administering and/or lawfully representing the prospective junket operator, has/have not been convicted by a final court ruling of crimes relating to the wider financial sector and of crimes specified in the laws on games of chance, in Greece or abroad.

cc) they personally or in the case of a legal person, the persons managing, administering and/or lawfully representing the prospective junket operator, has/have not been convicted by a final court ruling of crimes under Article 4(1), (2) and (4) of Law 2206/1994 (Government Gazette 62/A).

dd) neither the junket operator personally nor in the case of a legal person, the persons managing, administering and/or lawfully representing the prospective junket operator, has/have had any administrative sanction imposed on them for breaches of the law on the wider financial sector in Greece or abroad.

ee) there are no proceedings pending against the junket operator personally or in the case of a legal person, the persons managing, administering and/or lawfully representing the prospective junket operator, for breaches and crimes referred to in points (aa) to (dd) either in Greece or abroad.

ff) they are not declared bankrupt or being forced to wind up, are not in receivership, have not entered an arrangement with creditors or are not in any analogous situation and are not the subject of proceedings concerning those matters or were not in any similar situation.

gg) they unreservedly give their full consent to the processing of their personal information and data by the HGC, including making available to the Authority and/or allowing verification of said data and information by third parties.

Where the applicant for the Suitability Licence falls into any of the cases in points (bb) to (ee), the person must necessarily declare the situation they are in and submit any information in their possession

and request the HGC to examine whether, despite said situation, it could approve the application since the situation they are in does not put the lawful and transparent running of the Games at risk.

- i) a draft contract to be signed by the Licensed Casino and the prospective junket operator; and
- j) proof of payment of the respective fees to the HGC.

8.4. When the application relates to a legal person the following supporting documents and information shall also be submitted:

- a) depending on the applicant's legal form and the laws of the country of establishment, the applicant's incorporation and lawful operating documents;
- b) a decision on the official establishment of the Board of Directors;
- c) minutes of the Board of Directors or the document conferring powers of representation for the legal person; and
- d) authorisation to sign and submit the application if it is not signed by the legal representative.

8.5. In all cases where under the relevant provisions the prospective junket operator is obliged to hold a licence to carry on a profession or business activity, the relevant licence should also be submitted.

8.6. Where legal conditions are met, the HGC shall grant the Suitability Licence and enter the Junket Operator in the relevant register. Entry shall constitute adequate notice and proof that the Suitability Licence has been issued and consequently that the functions it relates to are being lawfully performed.

8.7. A fee of EUR 1, 000 shall be paid for granting the Suitability Licence for a junket operator and entering that person in the relevant register.

8.8. The persons entered in the register shall inform the HGC of any change which directly or indirectly relates to the approval of their Suitability, within twenty (20) days as of the date on which the change occurred, and shall submit, along with the notice, the information and supporting documents referred to as necessary to document the change.

8.9. An HGC decision shall lay down the manner, type, form and procedures for keeping the data and information relating to the running of games of chance in the context of their collaboration.

8.10. The HGC may invite prospective junket operators to a personal interview, in order to form an opinion on their Suitability.

8.11. The Licensed Casino shall send the HGC the contract signed with the junket operator as well as any amendments to it once they take effect.

Article 9

MANUFACTURER'S SUITABILITY LICENCE

9.1. In order to run Games, the Licence Holder shall use Technical Means and Materials and/or Studios from a person who holds a Manufacturer's Suitability Licence granted by the HGC.

9.2. The Manufacturer's Suitability Licence shall be valid for seven (7) years. There are the following categories of Manufacturer's Suitability Licence:

- a) Category A.1. granted to Manufacturers of one or more of the following, which the prospective Manufacturer intends to make available to one or more Licence Holders and provide management and operating services for such:
 - aa) Information systems and related hardware for running online bets and poker games and its variants, provided online;
 - bb) Information systems and related hardware for running games of chance whose outcome is generated by a random number generator and are provided online; and

cc) Studios for running other online games of chance which are broadcast live.

In order to determine whether a person requesting a Manufacturer's Suitability Licence will provide the aforementioned management and operating services, the HGC shall review the applicant's obligations in the context of its relationship with the Licence Holder paired with the services provided, such as: design, redesign, installation, operation, adaptation and adjustment of information systems for running games, gaming software, Studios and related equipment, compliance with the management and technical requirements for the running of the Games in order to achieve compliance with the provisions of the Gaming Regulations, and keeping of files, data, information and/or reports relating to gaming activities, etc.

b) Category A.2. granted to Manufacturers of one or more items of Technical Means and Materials from the cases in Category A.1, which the prospective Manufacturer intends to make available to one or more Licence Holders and for which the prospective Manufacturer shall not provide management and operating services.

c) Category B, granted to Manufacturers of one or more of the following types of Technical Means and Materials:

aa) Information systems and related hardware for running land-based betting games and lottery games organised and operated by OPAP S.A;

bb) Information systems and related hardware for running sweepstakes games organised and run by Hellas Horse Races S.A;

cc) Information Systems and related hardware for running games of chance via VLT gaming machines, which are organised and run by OPAP S.A;

dd) Information systems and related hardware for running state lottery games organised and operated by HELLENIC LOTTERIES S.A.; and

ee) VLT gaming machines and games played thereon which are organised and run by OPAP S.A.

d) Category C, granted to Manufacturers of one or more of the following types of Technical Means and Materials:

aa) Information systems and related hardware for running games as casinos;

bb) Gaming machines installed and operated by casinos and the games played thereon; and

cc) Information systems and related hardware for running games on broadcast and telecommunications media.

e) Category D, granted to Manufacturers of one or more of the following types of Technical Means and Materials:

aa) equipment for playing table-top games at casinos and equipment for Studios;

bb) lottery tickets; and

cc) draw machines.

g) Category E, granted to Manufacturers of Technical Means and Materials which does not fall into categories A, B, C and D above.

9.3. An HGC decision shall set out in further detail the types of Technical Means and Materials and shall add Technical Means and Materials to the above Manufacturer Suitability Licence categories.

9.4. Application for a Manufacturer's Suitability Licence, other than that of Category A.1, may also be submitted by a Licence Holder if the Licence Holder carries out Manufacturer's activities such as design, planning, manufacturing, development, production, adaptation, adjustment and in general sale of Technical Means and Materials.

9.5. In order for a person to obtain a Manufacturer's Suitability Licence the following conditions must be met:

- a) In the case of a person who applies for a Category A.1 Manufacturer's Suitability Licence, they must hold a licence issued by the competent regulatory authority of the EU or EEA, as well as an ISO/IEC 27001 certification or must have proof of having commenced the necessary procedures to obtain ISO/IEC 27001 certification.
- b) The prospective Manufacturer or in the case of a legal person, the persons managing, administering and/or lawfully representing the prospective Manufacturer, has/have not been convicted by a final court ruling of a felony or been subject to a penalty for theft, embezzlement, fraud, breach of trust, acceptance and disposal of the proceeds of criminal activities, extortion, forgery, active or passive bribery, grievous or actual bodily harm, concealing a crime, crimes relating to currency, crimes which are commonly considered dangerous, crimes against personal freedom, sexual offences, sexual exploitation offences, a crime specified in the legislation on narcotics, weapons, explosives or tax evasion, crimes in the wider financial sector, and crimes specified in the legislation on games of chance, in Greece or abroad.
- c) They are not declared bankrupt or being forced to wind up, are not in receivership, have not entered an arrangement with creditors or are not in any analogous situation and are not the subject of proceedings concerning those matters or were not in any similar situation.
- d) The licence or authorisation or certification for a game of chance Technical Means and Materials manufacturer has not been withdrawn by another regulatory authority or governmental agency or service.

9.6. To obtain a Manufacturer's Suitability Licence, interested parties shall submit a relevant application to the HGC. Anyone may apply for a Manufacturer's Suitability Licence for one and/or more categories in paragraph 9.2.

9.7 The application shall serve as a declaration on honour under Article 8(4) of Law 1599/1986 (Government Gazette 75/A) that all information included therein, as well as the information accompanying it, is true and accurate and it shall be accompanied by a dossier which includes the following information and supporting documents:

- a) a certificate on commencement of the professional/commercial activity (if applicable);
- b) proof of appointment of a process agent in the case where the applicant is established abroad;
- c) certificates of entry in the registers of professionals/companies in the country of establishment;
- d) licences/authorisations/certifications on the carrying on of the profession/activity of manufacturer of game of chance Technical Means and Materials (if any); and
- e) A copy of the criminal record for the person applying and in the case of legal persons, for members of the Board of Directors, partners and persons carrying on management and administration of the applicant;
- f) **In the case of a prospective manufacturer that falls into category A.1:**
 - aa) a licence for the sale of Technical Means and Materials and/or Studios to operators of games of chance, which has been issued by a competent regulatory authority of a Member State of the EU or EEA; and
 - bb) **A preliminary agreement or partnership agreement with a Licence Holder, if any, on the selling of Technical Means and Materials and/or Studios to the Licence Holder and/or rendering support in managing and operating them. Should a contractual agreement between the Licence Holder and the Manufacturer who applies for a suitability licence remain in effect after the granting of the suitability**

licence to the manufacturer, all evidence proving said contractual agreement shall be forwarded to the HGC within fifteen (15) days as of the day on which such agreement was concluded.

g) A declaration on honour from the applicant or in the case of a legal person, from any person who manages, administers or lawfully represents the prospective Manufacturer, on which the authenticity of the signature has been certified, declaring that:

aa) they have not been convicted by a final court ruling of a felony or been subject to a penalty for theft, embezzlement, fraud, breach of trust, acceptance and disposal of the proceeds of criminal activities, extortion, forgery, active or passive bribery, grievous or actual bodily harm, concealing a crime, crimes relating to currency, crimes which are commonly considered dangerous, crimes against personal freedom, sexual offences, sexual exploitation offences, or for a crime specified in the legislation on narcotics, weapons, explosives or tax evasion.

bb) they have not been convicted by a final court ruling of a felony or imposed any penalty for crimes in the wider financial sector, and for a crime specified in the law on games of chance.

cc) the authorisation, certificate or permit of the Technical Means and Materials manufacturer has not been withdrawn by another regulatory authority or governmental body or service.

dd) they were not the CEO, administrator, or partner of a gambling company declared bankrupt or being forced to wind up, is not in receivership, has not entered an arrangement with creditors or is not in any analogous situation and is not the subject of proceedings concerning those matters or was not in any similar situation, within three (3) months prior to the end of the legal relationship.

ee) they were not the CEO, administrator, partner of a gambling company whose licence was permanently withdrawn by the competent regulatory authority or other competent supervisory body while the legal relationship with the gambling Licence Holder based on which they performed Key Functions was in effect, within three (3) months prior to the end of the legal relationship.

ff) they unreservedly give their full consent to the processing of their personal information and data by the HGC, including making available to the Authority and/or allowing verification of said data and information by third parties.

gg) in the case of an application for a Suitability Licence for a manufacturer that falls into category A.1, they unconditionally acknowledge and accept that the granting of the Suitability Licence makes them subject to supervision and audit by the HGC on all issues regulated by the provisions in force relating to Technical Means and Materials for games of chance and/or Studios, which they manufacture, operate, manage and sell to Licence Holders, including on-the spot checks of their premises by the HGC.

Where the prospective Manufacturer falls into any of the cases in points (bb) to (ff), they must necessarily declare what situation they are in and submit any information in their possession and shall request the HGC to examine whether, despite said situation, it could approve the application since the situation of the person for whom the application is submitted does not put the lawful and transparent running of the Games at risk.

h) A certificate issued by the competent authority confirming that the applicant is not declared bankrupt or being forced to wind up, is not in receivership, has not entered an arrangement with creditors or is not in any analogous situation and is not the subject of proceedings concerning those matters or was not in any similar situation.

In particular, if the applicant is established in Greece, all certificates that said person is not bankrupt, has not entered an arrangement with creditors or is not in receivership, or has not undergone a consolidation process, shall be issued by the competent court of first instance of the person's seat. The certificate that the legal person has not been forced to wind up by court order shall be issued by the relevant court of first instance of the person's seat and the certificate that has not been forced to wind

up by decision of the partners shall be issued by the General Commercial Register pursuant to applicable provisions.

i) A list including, by way of example, categories, items and/or types of Technical Means and Materials and/or Studios which the applicant manufactures/sells or intends to manufacture/sell to Licence Holders.

j) In the case of a Category A.1 Manufacturer's Suitability Licence, an ISO/IEC 27001 certificate or a written certificate by the contractor who will undertake to develop and implement the ISO/IEC 27001 information security management system confirming that the prospective Manufacturer has commenced the necessary procedures required to obtain ISO/IEC 27001 certification shall be submitted.

k) Proof of payment of the respective fees to the HGC.

o) Any other additional information which the HGC requests to be submitted in order to assess the applicant's Suitability criteria.

m) The following shall also be submitted in the case of a legal person:

aa) depending on the applicant's legal form and the laws of the country of establishment, the applicant's incorporation and lawful operating documents;

bb) a decision on the official establishment of the Board of Directors;

cc) minutes of the Board of Directors or the document conferring powers of representation for the legal person;

dd) an authorisation to sign and submit the application if it is not signed by the legal representative; and

ee) in the case of a Suitability Licence for a manufacturer that falls in category A.1, the applicant's shareholder line-up with a detailed statement of the holding of each shareholder, partner or unit holder, and an indication of the beneficial owner for holdings of more than 10% of the shares or units.

9.8. Where legal conditions are met, the HGC shall grant the Manufacturer's Suitability Licence and enter the licence holders in the relevant register. Entry shall constitute adequate notice and proof that the Manufacturer's Suitability Licence has been issued and consequently that the functions it relates to are being lawfully performed.

9.9. The following amounts shall be paid to grant a Manufacturer's Suitability Licence to a person under this Article, to register the Suitability Licence and maintain its validity:

a) for a Category A.1 Manufacturer's Suitability Licence:

aa) A fee of EUR 5, 000 upon submission of the application; and

bb) An annual fee of EUR 25, 000 to retain the entry in the register.

b) for a Category A.2 Manufacturer's Suitability Licence:

aa) A fee of EUR 1, 000 upon submission of the application; and

bb) An annual fee of EUR 5, 000 to retain the entry in the register.

c) for a Category B Manufacturer's Suitability Licence:

aa) A fee of EUR 1, 000 upon submission of the application; and

bb) An annual fee of EUR 5, 000 to retain the entry in the register.

d) for a Category C Manufacturer's Suitability Licence:

aa) A fee of EUR 500 upon submission of the application; and

bb) An annual fee of EUR 1, 000 to retain the entry in the register.

e) for a Category D Manufacturer's Suitability Licence:

aa) a fee of EUR 250 upon submission of the application; and

bb) An annual fee of EUR 500 to retain the entry in the register.

f) For a Category E Manufacturer's Suitability Licence, fees and charges shall be set by decision of the HGC.

9.10. In the case of a person applying for a Manufacturer's Suitability Licence for more than one category, the fee for each category shall be paid along with the highest annual retention fee for the various categories.

9.11 Termination of the validity of the relevant license granted by a competent regulatory authority to a holder of a Category A.1 Manufacturer's Suitability Licence or expiry of the validity of the ISO/IEC 27001 certificate shall automatically entail withdrawal of the Manufacturer's Suitability Licence for that Category, without any other formalities. Should the Manufacturer render their services to Licence Holders as long as one of said licences is valid, the HGC shall verify whether, despite termination of the validity of a licence, the Manufacturer may continue to render their services provided the other licences they hold are valid.

9.12. The holder of a Category A.1 Manufacturer's Suitability Licence who was granted a Suitability Licence for that category by submitting a written certificate referred to in paragraph 9.7(j), shall submit the ISO/IEC 27001 certificate within twelve (12) months as of the date on which the Suitability Licence was granted, otherwise said licence shall be automatically withdrawn without any further formalities.

9.13. The persons entered in the Manufacturers' Register shall inform the HGC of any change which directly or indirectly relates to the approval of their Suitability, within twenty (20) days as of the date on which the change occurred, and shall submit, along with the notice, the information and supporting documents referred to as necessary to document said change.

9.14. The Licence Holder shall immediately inform the HGC of the holder of a Category A.1 Manufacturer's Suitability Licence which they collaborate with.

9.15. The HGC may issue a decision specifying the format in which information is to be kept and how the relationship between the Licence Holder and the holder of the Category A.1. Manufacturer's Suitability Licence is to be coded and displayed, as well as all specific issues and modalities required to give effect to the provisions of this Article.

Article 10

SUITABILITY LICENCE FOR IMPORTERS – SUPPLIERS

10.1. In order to lawfully supply Licence Holders with Technical Means and Materials from one or more Manufacturers, every importer – supplier shall be obliged to hold an Importer – Supplier Suitability Licence granted by the HGC.

10.2. The Importer – Supplier's Suitability Licence shall be valid for seven (7) years. There are the following categories of Suitability Licence for Importers – Suppliers of Technical Means and Materials used for the running of Games of Chance:

a) Category E.1, granted to Importers – Suppliers of one or more types of Technical Means and Materials manufactured by a Category A.2 Manufacturer;

b) Category E.2, granted to Importers – Suppliers of one or more types of Technical Means and Materials manufactured by a Category B Manufacturer;

c) Category E.3, granted to Importers – Suppliers of one or more types of Technical Means and Materials manufactured by a Category C Manufacturer;

d) Category E.4 granted to Importers – Suppliers of one or more types of Technical Means and Materials manufactured by a Category D Manufacturer; and

e) Category E.5, granted to Importers – Suppliers of one or more types of Technical Means and Materials manufactured by a Category E Manufacturer.

10.3. In order for a person to obtain an Importer – Supplier Suitability Licence, the following conditions must be met:

aa) the prospective Importer – Supplier or in the case of a legal person, the persons managing, administering and/or lawfully representing the prospective Importer – Supplier, has/have not been convicted by a final court ruling of a felony or been subject to a penalty for theft, embezzlement, fraud, breach of trust, acceptance and disposal of the proceeds of criminal activities, extortion, forgery, active or passive bribery, grievous or actual bodily harm, concealing a crime, crimes relating to currency, crimes which are commonly considered dangerous, crimes against personal freedom, sexual offences, sexual exploitation offences, a crime specified in the legislation on narcotics, weapons, explosives or tax evasion, crimes in the wider financial sector, and crimes specified in the legislation on games of chance, in Greece or abroad.

b) they are not declared bankrupt or being forced to wind up, are not in receivership, have not entered an arrangement with creditors or are not in any analogous situation and are not the subject of proceedings concerning those matters or were not in any similar situation.

c) they have signed a preliminary agreement or collaboration agreement with one or more holders of a Manufacturer's Suitability Licence for the Technical Means and Materials which are to be sold.

10.4. To ascertain Suitability of the persons referred to in this Article, said persons shall submit a relevant application to the HGC. Anyone may apply for an Importer – Supplier's Suitability Licence for one and/or more categories referred to in paragraph 10.2.

10.5 The application shall serve as a declaration on honour under Article 8(4) of Law 1599/1986 (Government Gazette 75/A) that all information included therein, as well as the information accompanying it, is true and accurate and it shall be accompanied by a dossier which includes the following information and supporting documents:

a) a certificate on commencement of the professional/commercial activity (if applicable);

b) proof of appointment of a process agent in the case where the applicant is established abroad;

c) certificates of entry in the registers of professionals/companies in the country of establishment;

d) licences/authorisations/certifications on the carrying on of the profession/activity of Importer – Supplier of game of chance Technical Means and Materials (if any); and

e) A declaration on honour from the applicant or in the case of a legal person, from any person who manages, administers or lawfully represents the prospective Importer – Supplier, on which the authenticity of the signature has been certified, declaring that:

aa) they have not been convicted by a final court ruling of a felony or been subject to a penalty for theft, embezzlement, fraud, breach of trust, acceptance and disposal of the proceeds of criminal activities, extortion, forgery, active or passive bribery, grievous or actual bodily harm, concealing a crime, crimes relating to currency, crimes which are commonly considered dangerous, crimes against personal freedom, sexual offences, sexual exploitation offences, or for a crime specified in the legislation on narcotics, weapons, explosives or tax evasion.

bb) they have not been convicted by a final court ruling of a felony or imposed any penalty for crimes in the wider financial sector, and for a crime specified in the law on games of chance.

cc) they were not the CEO, administrator, or partner of a manufacturer or importer–supplier of Technical Means and Materials or a gambling company declared bankrupt or being forced to wind up,

are not in receivership, have not entered an arrangement with creditors or are not in any analogous situation and are not the subject of proceedings concerning those matters or were not in any similar situation, within three (3) months prior to the end of the legal relationship.

dd) they were not the CEO, administrator or partner of a manufacturer or importer–supplier of Technical Means and Materials or a gambling company whose licence was permanently withdrawn by the competent regulatory authority or any other competent supervisory body, within three (3) months prior to the end of the legal relationship.

ee) they unreservedly give their full consent to the processing of their personal information and data by the HGC, including making available to the Authority and/or allowing verification of said data and information by third parties.

Where the prospective Importer – Supplier falls into any of the cases in points (bb) to (ee), the person must necessarily declare the situation they are in and submit any information in their possession and shall request the HGC to examine whether, despite said situation, it could approve the application since the situation of the person for whom the application is submitted does not put the lawful and transparent running of the Games at risk.

f) A certificate issued by the competent authority confirming that the applicant is not declared bankrupt or being forced to wind up, is not in receivership, has not entered an arrangement with creditors or is not in any analogous situation and is not the subject of proceedings concerning those matters or was in any similar situation,

In particular, if the applicant is established in Greece, the certificates that said person is not bankrupt, has not entered an arrangement with creditors or is not in receivership, or has not undergone a consolidation process, shall be issued by the competent court of first instance of the person's seat. The certificate that the legal person has not been forced to wind up by court order shall be issued by the relevant court of first instance of the person's seat and the certificate that has not been forced to wind up by decision of the partners shall be issued by the General Commercial Register pursuant to the applicable provisions.

g) A list including, by way of example, the manufacturers, categories, items and/or types of Technical Means and Materials that the applicant intends to sell to the Licence Holder;

h) A preliminary agreement or collaboration agreement with one or more holders of a Manufacturer's Suitability Licence for the Technical Means and Materials which are to be sold;

i) Proof of payment of the respective fees in favour of the HGC; and

j) Any other additional information which the HGC requests to be submitted in order to assess the applicant's Suitability criteria.

k) The following shall also be submitted in the case of a legal person:

aa) depending on the applicant's legal form and the laws of the country of establishment, the applicant's incorporation and lawful operating documents;

bb) a decision on the official establishment of the Board of Directors;

cc) minutes of the Board of Directors or the document conferring powers of representation for the legal person;

dd) an authorisation to sign and submit the application if it is not signed by the legal representative; and

ee) the applicant's shareholder line-up with a detailed statement of the holding of each shareholder, partner or unit holder, and an indication of the beneficiary owner for holdings of more than 10% of the shares or units.

10.6. Where legal conditions are met, the HGC shall grant the Importer – Supplier’s Suitability Licence and enter the licence holders in the relevant register. Entry shall constitute adequate notice and proof that the Importer – Supplier’s Suitability Licence has been issued and consequently that the functions it relates to are being lawfully performed.

10.7. The following amounts shall be paid in order to grant an Importer – Supplier’s Suitability Licence to a person under this Article, to register the Suitability Licence and maintain its validity:

- aa) A fee of EUR 1, 000 upon submission of the application; and
- bb) An annual fee of EUR 2, 000 to retain the entry in the register.

10.8. The persons entered in the Importers – Suppliers’ Register shall inform the HGC of any change which directly or indirectly relates to the approval of their Suitability, within twenty (20) days as of the date on which the change occurred, and shall submit, along with the notice, all information and supporting documents referred to as necessary to document the change.

Article 11

TECHNICIAN’S SUITABILITY LICENCE

11.1. In order to lawfully carry out repairs and maintenance on Technical Means and Materials, the Technician shall be obliged to hold a Technician’s Suitability Licence.

11.2. Technicians which belong to the staff of the legal persons who hold a Manufacturer’s Suitability Licence shall lawfully repair and maintain the Technical Means and Materials and/or Studios manufactured/sold to Licence Holders and they do not need to hold a Technician’s Suitability Licence. To that end, the Manufacturer shall notify the HGC of the technicians they make available to repair and maintain the Technical Means and Materials and/or Studios they manufacture/sell to Licence Holders.

11.3. A legal person may obtain a Technician’s Suitability Licence where at least one of the partners in the case of a partnership or member of the management or administrative team in the case of non-partnerships, or at least one member of staff holds a Technician’s Suitability Licence.

11.4 The are the following categories of a Technician’s Suitability Licence:

- a) Category T.1, granted to IT system Technicians;
- b) Category T.2, granted to Technicians who install, configure and maintain Games and gaming machines and related equipment; and
- c) Category T.3, granted to Technicians for table-top games and other casino equipment.

11.5. In order for a person to obtain a Technician’s Suitability Licence, the following conditions must be met:

- a) the prospective Technician personally, or in the case of a legal person, the persons managing, administering and/or lawfully representing the prospective Technician, has/have not been convicted by a final court ruling of a felony or been subject to a penalty for theft, embezzlement, fraud, breach of trust, acceptance and disposal of the proceeds of criminal activities, extortion, forgery, active or passive bribery, grievous or actual bodily harm, concealing a crime, crimes relating to currency, crimes which are commonly considered dangerous, crimes against personal freedom, sexual offences, sexual exploitation offences, of for a crime specified in the legislation on narcotics, weapons, explosives or tax evasion.
- b) the prospective Technician personally, or in the case of a legal person, the persons managing, administering and/or lawfully representing the prospective Technician, has/have not been convicted by a final court ruling of crimes relating to the wider financial sector and of crimes specified in the laws on games of chance, in Greece or abroad.

c) in the case of a legal person, they are not declared bankrupt or being forced to wind up, are not in receivership, have not entered an arrangement with creditors or are not in any analogous situation and are not the subject of proceedings concerning those matters or are not in any similar situation.

d) They shall have:

aa) a recognised tertiary education qualification (university or technological educational institute), in an area of specialisation relevant to IT, IT systems, electrical engineering or electronics or a recognised tertiary education qualification (university or technological educational institute) in another science specialisation with at least one year's experience in the subject, or

bb) a recognised post-lyceum education qualification in an area of specialisation relevant to IT, IT systems, electrical engineering or electronics or another science specialisation with at least two- year experience in the subject, or

cc) a recognised secondary vocational education qualification in an area of specialisation relevant to IT, IT systems, electrical engineering or electronics or another science specialisation with at least two-year experience on said subject, or

dd) a general lyceum completion certificate (graduation certificate) or recognised secondary vocational education qualification in a specialisation unrelated to the subject and at least three (3) years of experience on said subject and 50 hours of relevant training/education.

Studies in sectors relevant to IT or IT systems are prerequisites for granting the category T.1 Technician's Suitability Licence.

11.6. To ascertain Suitability of the persons referred to in this Article, said persons shall submit a relevant application to the HGC. Anyone may apply for a Technician's Suitability Licence for one and/or more of the categories as stated in paragraph 11.4.

11.7 The application shall serve as a declaration on honour under Article 8(4) of Law 1599/1986 (Government Gazette 75/A) that all information included therein, as well as the information accompanying it, is true and accurate and it shall be accompanied by a dossier which includes the following information and supporting documents:

a) a curriculum vitae;

b) a photocopy of the applicant's ID Card or passport;

c) certificates of professional experience, at least where required;

d) certificates of attendance at training/education courses, where required;

e) licences/authorisations/certifications for carrying on the profession/activity of technician (if any);

f) two (2) recent colour photographs;

g) a residence permit in the country of permanent residence, in the case of foreigners;

h) a certificate on the commencement of professional/commercial activities;

i) in the case of a legal person established abroad, proof of the appointment of a process agent;

j) certificates of entry in the registers of professionals/companies in the country of establishment (if available);

k) a declaration on honour from the applicant or in the case of a legal person, any person who manages, administers or lawfully represents the prospective Importer – Supplier, on which the authenticity of the signature has been certified, declaring that:

aa) they have not been convicted by a final court ruling of a felony or been subject to a penalty for theft, embezzlement, fraud, breach of trust, acceptance and disposal of the proceeds of criminal

activities, extortion, forgery, active or passive bribery, grievous or actual bodily harm, concealing a crime, crimes relating to currency, crimes which are commonly considered dangerous, crimes against personal freedom, sexual offences, sexual exploitation offences, or for a crime specified in the legislation on narcotics, weapons, explosives or tax evasion.

bb) they have not been convicted by a final court ruling of crimes relating to the wider financial sector and of crimes specified in the laws on games of chance, in Greece or abroad.

cc) they have not been convicted by a final court ruling of crimes referred to in Article 4(1), (2) and (4) of Law 2206/1994 (Government Gazette 62/A).

dd) they unreservedly give their full consent for the processing of their personal information and data by the HGC, including making available to the Authority and/or allowing verification of said data and information by third parties.

Where the prospective Technician falls into any of the cases in points (bb) to (dd), the person must necessarily declare the situation they are in and submit any information in their possession and shall request the HGC to examine whether, despite said situation, it could approve the application since the situation of the person for whom said application has been submitted does not put the lawful and transparent running of the Games at risk.

l) A copy of the criminal record;

m) Proof of payment of the respective fees to the HGC;

n) The following shall be submitted in the case of a legal person, as appropriate:

aa) depending on the applicant's legal form and the laws of the country of establishment, the applicant's incorporation and lawful operating documents;

bb) a decision on the official establishment of the Board of Directors;

cc) minutes of the Board of Directors or the document conferring powers of representation for the legal person;

dd) an authorisation to sign and submit the application if it is not signed by the legal representative; and

ee) A certificate issued by the competent authority confirming that the applicant is not declared bankrupt or being forced to wind up, is not in receivership, has not entered an arrangement with creditors or is not in any analogous situation and is not the subject of proceedings concerning those matters or in any similar situation.

In particular, if the applicant is established in Greece, the certificates that said person is not bankrupt, has not entered an arrangement with creditors or is not in receivership, or has not undergone a consolidation process, shall be issued by the competent court of first instance of the person's seat. The certificate that the legal person has not been forced to wind up by court order shall be issued by the relevant court of first instance of the person's seat and the certificate that has not been forced to wind up by decision of the partners shall be issued by the General Commercial Register pursuant to the applicable provisions.

ff) Documents which show the relationship between the legal person and the natural person who holds the Technician's Suitability Licence.

o) Any other additional information which the HGC requests to be submitted in order to assess the applicant's suitability criteria.

11.8. Legal persons who hold Technicians' Suitability Licences shall inform the HGC once any change occurs in relation to the natural person or natural persons who holds/hold the Technician Suitability Licences. Where the natural person who holds the Technician's Suitability Licence leaves the legal person, the

Suitability Licence shall be suspended and shall automatically be valid again where within six (6) months from suspension a legal relationship with another natural person who holds a Technician's Suitability Licence is notified to the authority, otherwise the legal person's Technician's Suitability Licence shall be withdrawn.

11.9. Where legal conditions are met, the HGC shall grant the Technician's Suitability Licence and enter the licence holders in the relevant register. Entry shall constitute adequate notice and proof that the Technician's Suitability Licence has been issued and consequently that the functions it relates to are being lawfully performed.

11.10. To grant a Technician's Suitability Licence to a person under this Article, to register the Suitability Licence and maintain its validity, the following amounts shall be paid:

- a) A fee of EUR 50,00 upon submission of the application; and
- b) An annual fee of EUR 50,00 to retain the entry in the register per Technician's Suitability Licence Category.

11.11. The persons entered in the Technicians' Register shall inform the HGC of any change which directly or indirectly relates to the approval of their Suitability, within twenty (20) days as of the date on which said change occurred, and shall submit along with the notice all information and supporting documents referred to as necessary to document the change.

Article 12

SUITABILITY CARD

12.1. A Suitability Card shall be issued by the HGC to each natural person holding a Suitability Licence pursuant to Articles 7 and 11. The Suitability Card shall contain the following information:

- a) the person's name/surname;
- b) the categories or roles for which the Suitability Licence has been obtained;
- c) the Suitability Licence identifying number;
- d) the month and year in which the Suitability Licence expires;
- e) the date on which the Suitability Card was issued; and
- f) a recent, clear, colour photograph of the holder.

12.2. The HGC shall issue a decision on the format of the Suitability Card and any additional information, the format in which information on the Suitability Card is to be held and coded, displayed and verified.

12.3. The holder of a Suitability Licence issued under Articles 7 and 11 shall prominently display their Suitability Card so that it is easy to carry out an immediate visual check, while they are performing their duties and when they are in the Gaming Room. Staff operating the casino's surveillance system are exempt from the obligation the holders of Suitability Licences issued under Articles 7 and 11 have to prominently display their Suitability Card, but they shall carry it with them while in the Gaming Room and show it in all cases when requested by the competent officers.

12.4. In case the Suitability Card is lost or destroyed, a new one, with the same Suitability Licence code number, shall be issued, after the Suitability Licence holder submits a declaration on honour on the loss or destruction of the card, on which the authenticity of the signature has been certified. In case the card has been destroyed, it shall be submitted to the HGC.

Article 13

REGISTER OF HOLDERS OF SUITABILITY LICENCES KEPT BY THE LICENCE HOLDER

13.1. The Licence Holder shall keep a register of all holders of Suitability Licences issued under Articles 6 to 11 inclusive, and information including as a minimum the name–surname, father’s name, ID card or passport number, Key Functions or categories or specialisations of the Suitability Licence holder, as well as the Suitability Licence identifying number and Key Functions, categories or specialisations.

13.2. Within the first five (5) working days of each month, the Licence Holder shall send the HGC a list of holders of Suitability Licences issued under Articles 6, 7, 8 and 11. This list shall as a minimum indicate the name and surname, father’s name, ID card or passport number, date of issue and issuing authority, Key Functions or specialisation of the Suitability Licence holder, the start and end date of the legal relationship, and the Suitability Licence identifying number.

13.3. The Licence Holder shall be obliged to check compliance with the conditions for issuing Suitability Licences under Articles 6, 7 and 8 and Article 11 where they continue to have a legal relationship with holders of Suitability Licences issued under these provisions.

13.4. The Licence Holder shall provide the HGC with the registers referred to in paragraph 13.1 at the time and in the manner specified by the Authority. The HGC may issue a decision adding data and information to be held in the relevant register and may specify the manner and format for retaining and sending such data, the type and format of the data held, the manner in which changes are displayed, the manner in which information is displayed and coded, and all other necessary modalities.

13.5. Upon relevant request, the HGC shall grant the holders of Suitability Licences a certificate on the validity of the Suitability Licence which may be used for all lawful purposes.

Article 14

PROCEDURE FOR PAYING THE SPECIFIED FEES AND CHARGES

14.1. The fees and charges specified shall constitute resources of the HGC and shall be paid into a bank account specified by the Authority. Any relevant deposits made shall constitute collection of the relevant fees and charges and the corresponding deposit slip shall be a proof of payment, and shall expressly indicate as a reason the identifying number and the type of fee or charge.

14.2. The HGC shall issue a decision regulating the details, manner and time of payment of the fees and charges specified as well as specific matters required to give effect to the provisions of this Article.

Article 15

SUPERVISION AND AUDIT

15.1. Supervision and audit of the persons who have obtained Suitability Licences shall be exercised by the HGC in accordance with the relevant provisions and the Gaming (Compliance, Audit and Administrative Sanctions) Regulation.

15.2. The Licence Holder and holders of Suitability Licences shall be obliged to grant the HGC and its authorised personnel access to the relevant data and facilities, in the manner and at the time specified by the Authority.

Article 16

CERTIFICATION BODIES – RECOGNITION OF SPECIALISED LABORATORIES

16.1. The HGC shall accept certifications, apart from those for Technical Means and Materials and Studios, issued by certification bodies accredited in accordance with the applicable European and/or international standards, by the Hellenic Accreditation System S.A. or by accreditation bodies in other countries, with which the Hellenic Accreditation System S.A. has signed a mutual recognition agreement.

16.2. The HGC shall accept Technical Means and Materials and Studio certifications issued by certification bodies which hold ISO/IEC 17020, ISO/IEC 17025 and ISO/IEC 17065 certifications, carry out compliance audits at a specialised Test Lab

ab and have been recognised by the HGC. Certifications for Technical Means and Materials and/or Studios shall cover the scope of the operational requirements and technical specifications referred to in the relevant Gaming Regulation.

16.3. A certification body which operates a specialised Test Lab should submit a relevant application to the HGC in order to receive recognition.

16.4 The application shall serve as a declaration on honour under Article 8(4) of Law 1599/1986 (Government Gazette 75/A) that all information included therein, as well as the information accompanying it, is true and accurate and it shall be accompanied by a dossier which includes the following information and supporting documents:

- a) depending on the applicant's legal form and the laws of the country of establishment, the applicant's incorporation and lawful operating documents;
- b) a decision on the official establishment of the Board of Directors;
- c) minutes of the Board of Directors or the document conferring powers of representation for the legal person;
- d) authorisation to sign and submit the application if it is not signed by the legal representative;
- e) a copy of the ISO/IEC 17020, ISO/IEC 17025 and ISO/IEC 17065 certifications and any other relevant certifications;
- f) a certification/confirmation issued by an accreditation body in accordance with paragraph 16.1 which confirms/certifies that the organisation is accredited in the scope of the technical specifications and operational requirements laid down in the Gaming Regulation relevant to each certificate;
- g) a brief description of the organisational structure, the lab facilities used and the standards applied;
- h) a list of technical staff responsible for checking the Technical Means and Materials and Studios in accordance with the categorisation set out in paragraph 9.2;
- i) documents showing that it takes suitable measures (such as insurance coverage, keeping of stock) to cover any liabilities arising from its operations in the event of failures;
- j) proof of entry in the registers of other competent regulatory authorities in the EU or EEA;
- k) a statement from the legal representative declaring that the Certification Body:
 - aa) has not lost the accreditation it holds in order to carry out tests and to issue certificates for Technical Means and Materials or Studios.
 - bb) all certificates it holds are valid.
 - cc) it adopts suitable policies, implements adequate procedures and takes all measures needed to ensure the impartiality of tests which fall within its remit.
 - dd) it adopts suitable policies, implements adequate procedures and takes all measures needed to ensure any liabilities which arise from its operations in the case of failures.
 - ee) it is entitled to issue Technical Means and Materials and Studios' conformity certificates in accordance with the relevant Gaming Regulation.
- l) any other additional information which the HGC requests to be submitted, in order to assess the application for recognition.

16.5. Where legal conditions are met, the HGC shall approve the application and enter the Certification Body which operates the specialised Test Lab, in the relevant register. Entry shall constitute adequate notice and proof of recognition, and consequently proof that the body is lawfully carrying on its operations.

Article 17

TRANSITIONAL, REPEALED AND OTHER PROVISIONS

17.1. The granting of a gaming licence to the persons referred to in Article 203(1) of Law 4635/2019 (Government Gazette 167/A) shall also constitute a finding as to the Suitability of the persons referred to in Article 3 and Article 5(a) and (b). To that end, the persons referred to in Article 203(1) of Law 4635/2019 (Government Gazette 167/A) shall submit relevant applications to the HGC under Articles 3 and 6 as appropriate, prior to obtaining the Licence.

17.2. Licensed Casinos, OPAP S.A., Hellenic Lotteries S.A., Hellas Horse Races S.A., and the persons who Organise/Run Games of Chance on broadcasting or television media shall submit the supporting documents required for the persons referred to in Articles 3 and 5 by 31 December 2020.

17.3. Licensed Casinos which have a legal relationship with the persons referred to in Article 8 shall submit a relevant application for a Suitability Licence for those persons within two (2) months as of the date of entry into force hereof.

17.4. Manufacturer's Suitability Licences and certifications which have been issued in accordance with previously applicable provisions to persons who manufacture Technical Means and Materials, the sale of which requires possession of a category A.2, B, C and D Manufacturer's Suitability Licence referred to in Article 9 hereof, shall continue to be valid until 31 May 2021.

17.5 Importer – Supplier's Suitability Licences and certifications which have been issued in accordance with previously applicable provisions to persons who import/supply Technical Means and Materials, the sale of which requires possession of a category E.2, E.3 and E.4 importer – supplier's Suitability Licence referred to in Article 10 hereof, shall continue to be valid until 31 May 2021.

17.6. Suitability licences and certifications which have been granted to administrative and other staff referred to in Article 7 and to technicians and maintenance staff in accordance with previously applicable provisions shall be valid until a Suitability Licence is issued in accordance with the provisions hereof or until they are withdrawn where it is found that the terms and conditions for granting them are not met. The persons referred to in the previous subparagraph shall apply for a Suitability Licence in accordance with the provisions hereof no later than 30 September 2021, otherwise the Suitability Licence or certification shall be automatically withdrawn. Until the persons referred to in Article 7 apply for a Suitability Licence to the HGC in accordance with the provisions hereof, the Licensed Casino shall continue to check that the terms and conditions of the certifications granted to said persons in accordance with Article 33 of Decision No T/6736/2003 (Government Gazette 929/B) are met, shall keep the supporting documents relating to the certification granted up to date, shall issue proof of certification upon request from the certified person and in all cases where it finds that the terms and conditions of the certification granted have ceased to apply, shall withdraw certification and promptly inform the HGC.

17.7. Persons who have been granted certification or hold a suitability licence issued in accordance with previously applicable provisions shall pay the annual fees to retain the entry in the register specified herein by 1 January 2021.

17.8. All issues regulated by the provisions of Article 23 of Decision No. T/6736/2003 (Government Gazette 929/B) issued by the Minister of Development entitled "Regulation on the Administrative Audits and Supervision of the casino operation" as amended by HGC Decision No. 303/5/27.02.2018 (Government Gazette 1025/B) insofar as they relate to the granting of Suitability Licences to the persons referred to in Articles 3, 5, 7, 9, 10 and 11, shall be governed by the provisions hereof.

17.9. All issues regulated by HGC Decision No. 107/5/30.5.2014 (Government Gazette 1637/B), as in force, in relation to gaming and VLT gaming machine technicians, shall be governed by the provisions hereof.

17.10. From the entry into force of this Decision, the sole article of HGC Decision No. 106/6/23.5.2014 (Government Gazette 1432/B) shall be repealed.

17.11. From the entry into force of this Decision, provisions of Articles 25, 26, 27(1) to (6) (incl.), 28 and 33 of Decision No T/6736/2003 (Government Gazette 929/B) issued by the Minister of Development entitled “Regulation on the Administrative Audits and Supervision of the casino operation”, as amended by HGC Decision No 303/5/27.02.2018 (Government Gazette 1025/B), shall be repealed.

This decision shall enter into force as of its publication in the Government Gazette.

This decision shall be published in the Government Gazette.

Athens, 27 April 2022

The Minister

CHRISTOS STAIKOURAS