



HELLENIC REPUBLIC

HGC

Hellenic
Gaming Commission
INDEPENDENT PUBLIC AUTHORITY

2015

ANNUAL ACTIVITY REPORT

(Adopted by HGC Decision No. 203/2/26.04.2016)



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The Activity Report 2015 was compiled and edited by
Directorate of Planning and Research Department of Planning

The entire staff of the HGC has worked to prepare the Activity Report for the year 2015.

The Annual Activity Report of the Hellenic Gaming Commission for the year 2015 is available online,
at the website of the HGC: www.gamingcommission.gov.gr

AN INTRODUCTION BY THE PRESIDENT OF THE HGC

«Man is the measure of all things»

It is with this phrase from Protagoras that I started my speech on 30th April 2015 before the Special Permanent Committee on Institutions and Transparency of the Hellenic Parliament, when it met to confirm my appointment as the new President of the HGC.

I firmly believe that the anthropocentric approach should be an essential parameter in the way the HGC operates, all the more so in the current period of the severe economic crisis that our country has been experiencing since 2010.

I also consider that the thoughts I have just presented are not at all subjective, since the applicable legislative framework describes the mission of the HGC as a duty to regulate, supervise and inspect gaming in order to ensure legality and fairness in gaming activities, the interests of players, minors and the public at large, and the state revenue collection process.

This clearly shows how the HGC is called upon to strike a balance between important, sensitive, but at the same time conflicting objectives, such as protecting the public from problem gambling and the crimes associated with gambling, but also ensuring the collection of public revenue by creating the appropriate conditions in the way legal gambling service networks operate so that they are attractive to players.

This balance is even more difficult if we think of the particularities of the gaming market exhibits in Greece in the current economic environment, and considering the financial stakes and the power of economic interests active in the sector.

To be more specific, this is a market where 7.5 bn euros were «played» in 2015, with gross revenue for providers amounting to 1.7 bn euros, a market which is also - and this is one more key characteristic - the «kingdom of cash». A market dominated by a private monopoly (OPAP Group), while the segments where OPAP is not present are dominated by oligopolies (casinos, online providers).

In this context, it is easy to understand the purpose of the initiatives and decisions taken by the HGC Management, whose aim is to:

- (a) exercise a consistent and systematic restrictive policy in the gambling sector, in order to protect the public interest, minimize the negative social consequences (e.g. the waste of disposable income, problem gambling, etc.) and protect vulnerable groups.
- (b) promote the principles of responsible gaming and highlight the need to minimize the factors leading to addiction as a result of compulsive gambling (duration, frequency, quantity, intensity),
- (c) apply effective methods so that the HGC can exercise its powers and duties of supervision and compliance inspection,
- (d) further ensure a seamless, sound and reliable operation of gambling services,
- (e) inspect in a seamless and systematic way and ensure that the applicable State's share of the gross profit of enterprises – providers is paid and the applicable tax on players' winnings is withheld and collected, as laid down in the law.
- (f) create the conditions that will allow crosschecks by matching the money spent by players on gambling with their declared income, and
- (g) take extra measures to make the process of assessing violations - imposing sanctions legally sound and solid and to deter any delays in the payment of the fines imposed by the HGC as a means to encourage compliance and self-restraint among infringers.

Having said that, one can easily understand why, from June 2015 onwards, the HGC, its Members and its President in particular had to face (and are still facing) a barrage of criticism over the regulatory decisions that the HGC has taken.

The opposite would have been a surprise.

This offensive, which went up to the level of cannibalism, public humiliation and defamation of character, was not able to break the iron will of the HGC to consolidate legality and equality before the law in this peculiar and adverse market.

The autonomy of the HGC as an independent administrative authority is not to be perceived only in one way, i.e. only in relation to its interaction with the Central Government, (which has shown full respect to the HGC), but rather - and mainly - in relation to the business interests that act in this market, no matter how strong they are.

In 2015, the HGC had to work under two different leaderships, at first under Mr. Evgenios Giannakopoulos and the Members who remained in office until the end of May, when they resigned, and then under the new HGC management, which has been in office since June, when it was appointed by the Ministry of Finance, and which is headed by the author of this introduction.

This year, the HGC carried on its valuable work and completed its first action plan for the period 2013-2015, having achieved the best performance in three years, with 87% of the scheduled projects running or having been completed.

It should be noted that the HGC is one of the few public agencies that has been operating, since its activation in 2012 and until now, with an analytical strategic plan and a detailed action plan (the annual budget is based on this action plan) at an executive level.

By contrast to the previous action plan for the period 2013-2015, which had as an objective to create the necessary infrastructure and focused at the same time on completing the regulatory framework for the operation and compliance inspection of games and on granting the necessary licenses and certification, the new Action Plan 2016-2018, which was prepared and included in this Report, has specified as its main operational objective to fully activate the inspection activities of the HGC.

The challenges that the HGC has to deal with, both in the near future and in the years to come, are big. The completion and establishment by presidential decree of the Organizational Regulation of the HGC, whose entire staff is made up of seconded employees, originating in other services and bodies of the public sector, is extremely significant. And a reasoned recommendation

to the State on the substantial changes needed in the institutional framework of the gambling market (I specifically refer to the need for a thorough amendment of the provisions of Laws 4002/2011 and 2206/1994), which is in general obsolete and/or failed in relation to the initial purpose of the lawmakers, is also of great importance.

I should thank the previous HGC management, under Mr. Evgenios Giannakopoulos, for the work they carried out from the day the HGC was established through May 2015. When the former management took office, they just had an excerpt from the Government Gazette announcing the new agency and, in three years' time, they managed to deliver an independent administrative Authority with modern infrastructure, which has already produced valuable work and is staffed with excellent people. In addition, I would like to warmly thank the managers and other executives who made up the initial team of the HGC and have recently left due to the expiry of their secondment for their considerable contribution to the work of the previous and the current HGC management all these years.

I should also acknowledge the valuable contribution to and the energy expended for the attainment of the goals of the HGC by the Members who joined me in taking the relay back in June 2015 and are now helping me fulfill this demanding task.

Finally, I would like to express my deep sense of gratitude to the staff having served and continuing to serve in the HGC, for their devotion, their eagerness to work and improve their output, their faith in the vision of the HGC. Their work and their moral standards are the best answer to the perpetuated stereotypes of the public sector as «ineffective» and «useless».

The President of the HGC

Antonis Stergiotis

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INTRODUCTION

The Activity Report of the HGC for the year 2015 consists of fifteen (15) chapters, laid out as follows:

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

Chapter 2 introduces the gambling operators and the gaming services they provide and presents the financial figures of the gambling market in Greece.

Chapters 3, 4, 5, 6, 7 and 10 provide a detailed presentation of the work that the HGC has done to regulate the gaming market and inspect compliance of providers, as well as its work with regard to social responsibility, commercial communication, anti-money laundering action and cooperation with other institutions.

Chapter 8 includes the recommendations made by the HGC to the State for the improvement of the legislative and regulatory framework governing the gaming market in Greece.

Chapter 9 includes the court cases handled by the HGC and the assistance it provided in parliamentary control.

Chapter 11 reports on the systems developed for the organization and operation of the HGC, as well as on the recruitment of staff, the training of its employees, communication issues and the development of the necessary infrastructure.

Chapter 12 presents the most important financial figures, namely the HGC revenues and expenditure in 2015 and the budget for 2016.

Chapter 13 is a brief overview of the activities of the HGC Management.

Chapter 14 outlines the progress of the projects included in the Action Plan 2013-2015 per Operational Priority.

Chapter 15 presents the new Action Plan 2016-2018 per Operational Priority.

1.1 MISSION AND VISION OF THE HGC

The mission of the HGC is to regulate, supervise and inspect gaming in order to ensure legality and fairness in gaming activities, the interests of players, minors and the public at large, and the state revenue collection process.

The HGC has a vision to make all games legal and safe and free from negative financial, legal and social impacts.

1.2 LEGAL FRAMEWORK FOR THE OPERATION OF THE HGC

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

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

1.2.1 PRIMARY LAW

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

- a. Law 3051/2002 (GG Series A, No. 220): «Independent Authorities established by the Constitution». The provisions of this law apply in addition to the special provisions governing the HGC.
- b. Law 3229/2004 (GG Series A, No. 38), Chapter C, Articles 16 through 23: «Hellenic Gambling Commission and matters relating to the operation of Casinos».
- c. Law 3634/2008 (GG Series A, No. 9), Article 23: «Amendments to Article 16 of Law 3229/2004 (GG Series A, No. 38)».
- d. Law 3691/2008 (GG Series A, No. 166): «Prevention and suppression of money laundering and terrorist financing and other provisions», as amended by Law 3932/2011 (GG Series A, No. 49) and in force, whereby the HGC is designated as the competent Authority, which is responsible for overseeing the practical implementation of the law by casino enterprises, casinos on vessels under the Greek flag, enterprises, organizations and other entities organizing or providing gambling services, as well as by the agencies.
- e. Law 4002/2011 (GG, Series A, No. 180), Part D, Chapter H: «Regulation of the gaming market», Articles 25 through 54. The law assigned further powers to the public Authority that had already been established in 2004, but remained inactive, and renamed it to «Hellenic Gaming Commission

(HGC)». The HGC is now the authority that is responsible for issuing licenses and certifications and supervising and inspecting all sectors of the gaming industry.

- f. Law 4021/2011 (GG Series A, No. 218), Article 52: «Amendments to Law 4002/2011». The amendment regulates various issues regarding the pricing policy of the concessionaires, the process of certification of the licensees for the installation and operation of OPAP S.A. gaming machines, the administrative fees for the participation in the licensing tender and other related issues.
- g. Law 4038/2012 (GG Series A, No. 14), Article 7: «Regulation of matters relating to the Hellenic Republic Asset Development Fund and the HGC», paras. 10 through 26. In 2012, Law 4038/2012 was passed, whereby the Hellenic Gaming Commission (HGC) retained its powers and duties, its name and registered office and became an independent Public Authority enjoying full administrative and financial independence and autonomy as per Law 3051/2002, without prejudice to the special provisions referring to the HGC.
- h. Law 4141/2013 (GG Series A, No. 81), Chapter E: «Other provisions within the competence of the Ministry of Finance, articles 22 through 24. It regulated matters pertaining to the organization of the HGC, corrections and additions to the existing gaming provisions and other matters in relation to OPAP S.A.
- i. Law 4182/2013 (GG Series A, No. 185) Chapter N: «Other Provisions», article 92, «Matters related to the Central State Aid Unit of the Hellenic Gaming Commission (HGC)», whereby the HGC took over all the responsibilities of the Directorate of Casino Supervision of the Ministry of Tourism and the Casino Commission of Law 2206/1994 (GG Series A, No. 62).
- j. Law 4209/2013 (GG Series A, No. 253): Article 106 of the Law regulates various issues regarding the granting of special licenses by the HGC for gambling on broadcast and telecommunications media and other related issues.
- k. Law 4223/2013 (GG Series A, No. 287), article 34, whereby various issues regarding the organizational structure of the HGC are regulated.
- l. Law 4255/2014 (GG Series A, No. 89), Article 22, para. 3, defining the terms and method of payment of the Greek State's share of gross profit from the games of chance operated by casino enterprises.
- m. Law 4261/2014 (GG Series A, No. 107), article 173 «Rules governing Games of Chance».
- n. Presidential Decree 31/2014 (GG Series A, No. 56): «Prudential supervision of the expenditure of the Independent Administrative Authority under the name «HELLENIC GAMING COMMISSION - HGC», which put all categories of expenditure of the HGC under prudential supervision by the Supreme Court of Audit.

1.2.2 REGULATORY LEGISLATION

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

- a. Decision No. 55906/1673/20.12.2011 of the Minister of Finance (GG Series «YODD» No. 444) titled «Establishment of the Hellenic Gaming Commission (HGC)», as amended and in force following

Decision No. 2/36411/0004/28.05.2015 of the Minister of Finance (GG Series «YODD» No. 385), whereby the resignation of the President and the Members of the HGC were accepted and a new President and Members were appointed, and Decision No. 2/69356/0004/17.11.2015 of the Minister of Finance (GG Series «YODD» No. 843), whereby the resignation of a Member of the HGC was accepted and a new Member was appointed.

- b. Joint Decision No. 56660/1679/22.12.2011 (GG Series B, No. 2910) of the Minister of Finance and the Minister of Culture and Tourism on the “Confirmation of the Commencement of Operations of the Hellenic Gaming Commission (HGC)».
- c. Decision No. 6/1/24.4.2012 (GG Series B, No. 1347) of the HGC, issued pursuant to para. 5 of Law 4002/2011 (GG Series A, No. 180), titled “Issues in the Organizational Regulation of the HGC pertaining to its financial management”.
- d. Decision No. 10/3/11.6.2012 (GG Series B No. 2066) of the HGC, as in force, issued pursuant to para. 5 of article 54 of Law 4002/2011 (GG Series A, No. 180), titled “Regulation of matters pertaining to the internal operation of the Hellenic Gaming Commission”, as amended by Decision No. 36/3/3.1.2013 (GG Series B, No. 6) of the HGC.
- e. Decision No. 39/7/14.1.2013 (GG Series B No. 43) of the HGC, titled «Issues in the Organizational Regulation of the HGC pertaining to the leasing of property».
- f. Decision No. 51/4/2/26.4.2013 (GG Series B No. 1330) of the HGC, titled «Regulation of matters included in the Travel Regulation of the HGC», whereby issues related to the official trips of employees and members of the HGC are regulated.
- g. Decision No. 133/2/3.12.2014 (GG Series B No. 3508) of the HGC titled «Adoption of Regulation on the Organization, Operation and Structure of the Service Units of the Hellenic Gaming Commission», as in force. This decision replaced Decision No. 90/2/13.1.2014 (GG Series B No. 190) of the HGC on that issue, in order to allow the HGC to fulfill its responsibilities more effectively.

1.3 POWERS AND DUTIES OF THE HGC

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

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

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

The relevant inspections are intended to ensure the legality of games; compliance with the rules on transparent, honest and fair gaming; sound economic management; due payment of winnings to players; due collection of State taxes and compliance with the terms of gambling licenses. Moreover,

the HGC is responsible for laying down and implementing proper frameworks and measures for the protection of minors and other vulnerable groups and for the prevention of illegal gaming, fraud, money laundering and similar crimes.

Last but not least, the HGC has been appointed as the competent Authority to enforce the applicable administrative sanctions. As regards gambling, the HGC has competence in the games operated by OPAP S.A., HELLENIC LOTTERIES S.A., casino enterprises and Hellas Horse Races S.A., regardless of the gambling method (land-based, online, etc.). The HGC is also responsible for gambling on broadcast and telecommunications media.

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

Finally, the HGC is the Authority which is responsible for overseeing the practical implementation of the applicable legislation on money laundering and terrorist financing in casino enterprises, casinos on vessels under the Greek flag, enterprises, organizations and other entities organizing or providing gambling services, as well as in the agencies.

1.4 GENERAL RULES GOVERNING THE OPERATION AND FUNCTIONS OF THE HGC

By virtue of Resolution No. 8/6/25.05.2012, the HGC adopted a set of general rules which should be governing its activities relating to its operation and the execution of its regulatory functions.

1.4.1 GENERAL RULES APPLIED BY THE HGC AS REGARDS ITS OPERATION

The HGC applies the following general rules as regards its operation:

- a. Maximum utilization of available resources: The HGC must make full use of all human resources already available to the Greek State before seeking to acquire extra ones, so as to avoid increased costs both for the HGC and the State as a whole.
- b. Effective utilization of resources: The HGC must acquire and use resources only to the extent that these serve its needs and allow its smooth operation.
- c. Cost-effective management: The HGC must make all reasonable efforts to always improve its Return on Investment ratio.
- d. Ex-ante control: The HGC must seek to have ex-ante controls carried out in order to ensure the legality of its expenditure. To that effect, the HGC was put, at its own request, under prudential supervision by the Supreme Court of Audit.

THE GENERAL RULES APPLIED BY THE HGC

AS REGARDS ITS OPERATION

- Maximum utilization of available resources
- Effective utilization of resources
- Cost-effective management
- Ex-ante control
- Prioritization of actions
- Effective response

- e. Prioritization of actions: Given that the HGC is getting organized for the first time, it must prioritize its activities in such a way as to serve the public interest in the most efficient manner.
- f. Effective response: The HGC must address all citizen requests as fast and thoroughly as possible, by considering them on the merits and avoiding bureaucracy.

1.4.2 GENERAL RULES APPLIED BY THE HGC AS REGARDS ITS REGULATORY FUNCTIONS

- a. Proportionality: The HGC must only intervene if necessary. All measures adopted must be appropriate to prevent the risk they address and all costs they entail for the regulated entity must be justified.
- b. Accountability: The HGC must justify its decisions and be subject to public scrutiny.
- c. Consistency: The HGC must lay down regulatory frameworks whose provisions and requirements are consistent with each other and demonstrate impartiality in their enforcement.

THE GENERAL RULES APPLIED BY THE HGC

AS REGARDS ITS REGULATORY FUNCTIONS

- Proportionality
- Accountability
- Consistency
- Transparency
- Commitment
- Social responsibility and empathy

d. Transparency: The HGC must be honest, establish simple and clear regulatory frameworks and formulate them in such a way as to be easily understood by the users.

e. Commitment: The HGC must be committed to resolving problems and minimize the negative impact that its decisions are likely to have.

f. Social responsibility and empathy: In order to ensure responsible gaming, the HGC must be aware of and familiar with the needs of the public at large, and be in direct and open contact with the citizens, focusing primarily on vulnerable groups.

1.5 COMPOSITION OF THE HGC

By virtue of Decision No. 2/36411/0004/28.05.2015 of the Minister of Finance (GG Series «YODD» No. 385) titled

«Acceptance of the resignation and appointment of new Members in the Hellenic Gaming Commission (HGC)», as amended by Decision No. 2/69356/0004/17.11.2015 of the Minister of Finance (GG Series «YODD» No. 843), titled «Acceptance of the resignation of a Member of the Hellenic Gaming Commission (HGC) and appointment of a new Member», the composition of the Hellenic Gaming Commission, as at 31/12/2015, was as follows:

1) Antonios Stergiotis, Economist, President of the HGC,

2) Panagiotis Vagianos, Electrical - Mechanical Engineer, Member of the HGC,

3) Evaggelos Karagrigoriou, Economist, MSc in Shipping, Member of the HGC,

4) Ilias Katrakazis, Economist, Member of the HGC,

5) Nikolaos Stratis, Craftsman, Member of the HGC,

6) Sofoklis Alifierakis, Business Consultant, MSc in Finance, Member of the HGC,

7) Georgios Thodoris, Diplôme IT Engineer, MSc in Strategic Management and Finance, Member of the HGC,

8) Eleni Georgopoulou, Attorney at the Supreme Court, Member of the HGC replacing the resigned member Anastasios Patokos, as per Decision 2/69356/0004/17.11.2015 of the Minister of Finance (GG Series «YODD», No. 843), and

9) Ilias Tserionis, Attorney specialized in Public Law, Member of the HGC,

The term of the President and the Members under items 2 to 5 expired on 19th December 2015 (they remain in duty for six months after expiry of their mandate, as stipulated in para. 2, article 3 of Law 3051/2002, as in force), while the term of those under items 6 to 9 will expire on 19th December 2017.

The composition of the Hellenic Gaming Commission (HGC) until 28th May 2015, when the resignation and replacement of the President and its Members were accepted and confirmed, was as follows:

1) Evgenios Giannakopoulos, Attorney at Law, President of the HGC

2) Konstandinos Katsoudas, Attorney at Law, Member of the HGC

3) Panagiotis Perakis, Attorney at Law, Member of the HGC

4) Ioannis Charalampidis, Assistant Professor of e-Governance Information Systems at the University of the Aegean, Member of the HGC

5) Elissavet Tsaliki, Assistant Professor at the Department of Communication and Media, National Kapodistrian University of Athens, Member of the HGC

6) Ioannis Dandoulakis, International Relations Analyst, Member of the HGC.

7) Dimitra Malliou-Andritsopoulou, Teacher, Member of the HGC.

8) Gerassimoula Chalioti, Teacher, Member of the HGC and

9) Maria Kostopoulou, Attorney at Law, Member of the HGC.

1.6 ORGANIZATIONAL STRUCTURE OF THE HGC

Decision No. 133/2/03.12.2014 (GG Series B, No. 3508) of the HGC as in force approved the Rules on the Organization, Structure and Operation of its Service Units.

The organizational structure of the HGC is summarized as follows:

1.6.1 THE PRESIDENT OF THE HGC

The President of the HGC, who is designated by the applicable law as the person who has the overall responsibility to manage and oversee the HGC, exercises all his powers to execute these responsibilities. The President represents the HGC in court and out-of-court and can hire lawyers who are experts in Supreme Court cases to provide legal assistance and handle judicial and extra-judicial cases and/or provide advice or expert opinions. He also coordinates and guides the various Services of the HGC, supervises and oversees the execution of the HGC decisions, is the administrative and disciplinary supervisor of the employees, convenes the Administrative and Disciplinary Board as laid down in the law and exercises the duties assigned to him by the HGC in accordance with the applicable provisions.

The following service units report directly to the President of the HGC

a. The Legal Counsel Office

The Legal Counsel Office is responsible for providing legal assistance to the HGC in judicial and extra-judicial matters, as well as providing the necessary legal advice in each case and informing the Service Units about the provisions of law and case-law that are related to the issues falling under their responsibility. It is responsible for appearing before the court or any Authority to carry out the necessary procedures for the legal and judicial assistance to the HGC. It also drafts and checks all kinds of agreements, contracts and declarations issued by the HGC, it follows up draft legislation and draft regulation issued by virtue of delegated powers and related to the scope and activities of the HGC and it works on the relevant proposals.

b. The HGC Secretariat

The Secretariat of the HGC is responsible for keeping exact and true minutes of the decisions of the HGC and for keeping the records which prove that the Internal Rules of Procedure are followed. It prepares the items on the agenda of the HGC meetings in cooperation with the Service Units involved in them, it drafts and communicates the meeting agenda to the Members of the HGC, it keeps the minutes of the meetings and edits them before issuing them.

c. The President's Office

The President's Office supports the President in the fulfillment of his responsibilities. It ensures that the President receives the necessary secretarial and administrative support and it is responsible for handling special internal issues of the HGC assigned to it by order of the President. It is also responsible for planning and implementing the public communication policy of the HGC, it drafts and circulates Press Releases to the Media and ensures the proper use of the trademark and symbols of the HGC. Finally, it considers and evaluates the proposals submitted to the HGC for its participation in conferences, exhibitions and other events as a guest or co-organizer.

d. The AML Office

The AML Office is responsible for issues related to the security of the HGC and to its responsibilities as the competent authority for the fight against money laundering and terrorist financing in the

gaming market. In this context, it cooperates with the competent police and law-enforcement services, authorities and bodies in Greece and abroad, in order to retrieve and transmit information, it collects, processes, analyzes, evaluates and compiles crime-related information, data and complaints about crimes committed through the gaming industry and it cooperates with the counterpart departments of foreign authorities or international organizations to exchange experience and know-how.

1.6.2 THE DIRECTORATES OF THE HGC

The Directorates of the HGC are:

a. The Directorate of Planning and Research

The Directorate of Planning and Research is responsible for drafting the Action Plan of the HGC following the general principles put forward by the HGC, which also approves the Plan. In addition, the Directorate is responsible for monitoring and evaluating the extent to which the objectives of the actions included in the Action Plan have been achieved, proposing and establishing standards and inspecting compliance with these standards, as well as developing and managing the content of the HGC website. Furthermore, the Directorate conducts the studies and surveys prescribed by the objectives and responsibilities of the HGC, with the exception of the studies examining problem gambling, the protection of minors and Responsible Gaming.

The Directorate is organized into two (2) Departments, as follows:

- The Department of Planning.
- The Department of Research and Quality Systems

b. The Directorate of Regulation and Social Responsibility

The Directorate of Regulation and Social Responsibility is responsible for drafting the regulatory framework governing the operation and compliance inspection of all kinds of games, and for issuing the licenses and certifications laid down in the law. Moreover, the Directorate is responsible for cooperating with various institutional bodies in Greece and abroad on matters in the realm of the responsibilities of the HGC, and for planning and carrying out policies on problem gambling, protection of minors and Responsible Gaming. When necessary, the Directorate also participates in drafting the Gaming Regulation so as to tackle issues related to its responsibilities.

The Directorate is organized into four (4) Departments, as follows:

- The Department of Betting and Draw Games.
- The Department of Casinos and Gaming Machines.
- The Department of Amusement Games,
- The Department of Social Responsibility and Cooperation.

c. The Directorate of Audit and Compliance of Exclusive Rights Gaming Providers

The Directorate of Audit and Compliance of Exclusive Rights Gaming Providers is responsible for inspecting compliance with the applicable legislative and regulatory framework and the special terms and conditions governing the licensing and operation of gaming service providers who have been granted the authority to manage the rights of the Greek State on an exclusive basis. The Directorate submits proposals that promote a more effective operation of its field of responsibility and, when necessary, participates in drafting the Gaming Regulation, for the issues related to its responsibilities.

The Directorate is organized into four (4) Departments, as follows:

- The Department of Betting and Draw Games.
- The Department of Gaming Machines.
- The Department of State Lotteries.
- The Department of Management of the Inspectors' Register.

d. The Directorate of Audit and Other Gaming Providers

The Directorate of Audit and Other Gaming Providers is responsible for inspecting compliance with the applicable legislative and regulatory framework and the special terms and conditions governing the licensing and operation of gaming service providers who have been granted the authority to operate under a limited or full license, such as casino enterprises, electronic amusement games, remote games and any other kind of game falling under the responsibility of the Directorate of Audit and Compliance of Exclusive Rights Gaming Providers. The Directorate submits proposals that promote a more effective operation of its field of responsibility and, when necessary, participates in drafting the Gaming Regulation, for the issues related to its responsibilities.

The Directorate is organized into three (3) Departments, as follows:

- The Department of Casinos.
- The Department of Other Games of Chance.
- The Department of Electronic Amusement Games.

e. The Information and Technology Directorate

The Information and Technology Directorate is responsible for supporting the HGC in fulfilling its activities with the use of computer technologies, electronic transaction tools and telecommunication networks. It develops, secures and upgrades IT systems, maintains the HGC databases and ensures that an up-to-date technology is being used. In addition, it is responsible for the maintenance and smooth operation of the buildings and electromechanical equipment used by the HGC, as well as the execution of the relevant infrastructure works. The Directorate is responsible for keeping a personal data record for the HGC, computerizing its systems and ensuring secrecy in accordance with the applicable provisions.

The Directorate is organized into three (3) Departments, as follows:

- The Department of Systems Planning and Development.
- The Department of Systems Operation and Support.
- The Department of IT Systems Security and Data Protection.

f. The Directorate for Financial and Administrative Affairs

The Directorate for Financial and Administrative Affairs is responsible for planning, implementing and supporting the financial, administrative and management procedures required for the operation of the HGC. It drafts and monitors the execution of the annual budget, and it monitors revenue and expenditure, as well as property issues on the basis of the approved budget; it prepares the balance sheet and the financial statements, and it deals with accounting and cash management. It is responsible for developing human resources, as well as for hiring and dismissing staff, for their status of employment and evaluation, and for the administrative support of the service units. Finally, it executes the annual procurement plan of the HGC for the purchase of goods and services.

The Directorate is organized into five (5) Departments, as follows:

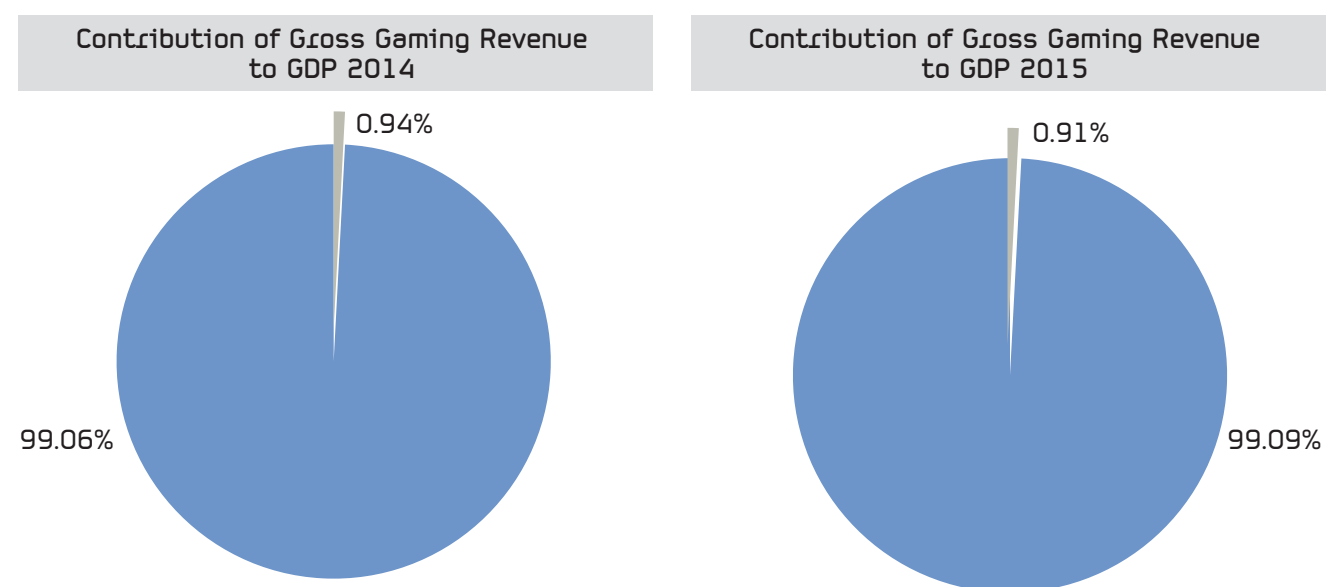
- The Department of Financial Planning and Accounting.
- The Department of Budget Execution and Cash Management.
- The Department of Administrative Affairs.
- The Procurement and Supplies Management Department.
- The Central Register and Documents Department.

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

2.1 THE GAMBLING MARKET

2.1.1 THE LAND-BASED GAMBLING MARKET IN GREECE

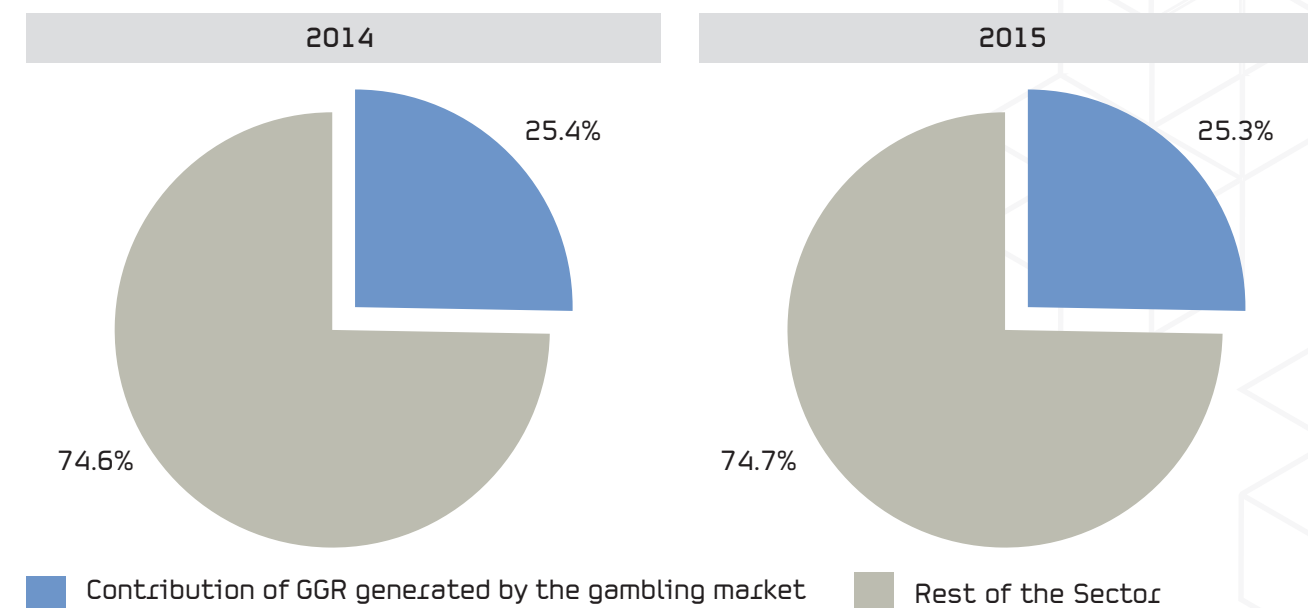
Gross revenue from the land-based gambling market was 1,610,273,033 in 2015 and contributed a share of 0.91% to the Gross Domestic Product (GDP)¹, which is a fall of 0.03% in relation to the previous year.



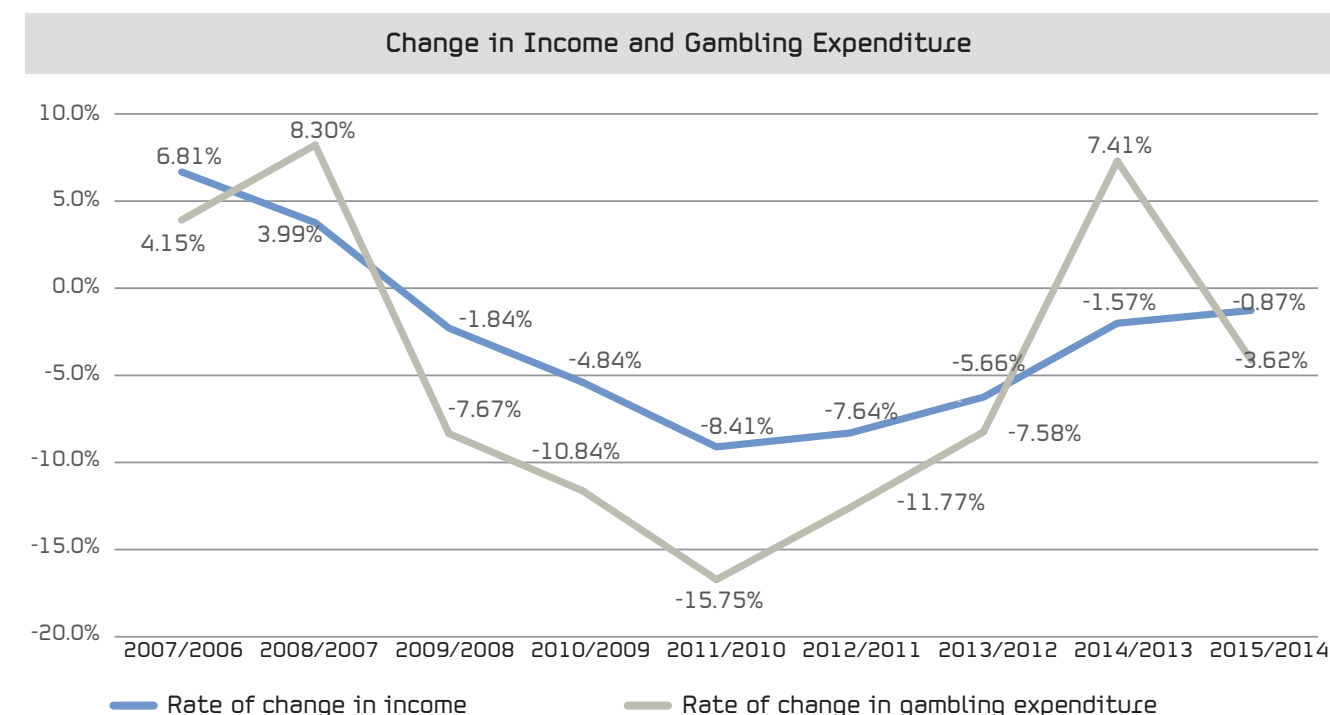
At the same time, the gross gaming revenue (GGR) generated by the gambling market in Greece in 2015 accounts for 25.3% of the gross value added by the Sector «Arts, entertainment, amusement, repairs of household items and other services»², which includes gambling, thus slightly decreasing its share of this sector in relation to 2014.

1. Source: Hellenic Statistical Authority - Annual National Accounts/Gross Domestic Product 2015 (provisional data)

2. Source: Hellenic Statistical Authority - Annual National Accounts/ Gross Value Added per Industry/2015 (provisional data).



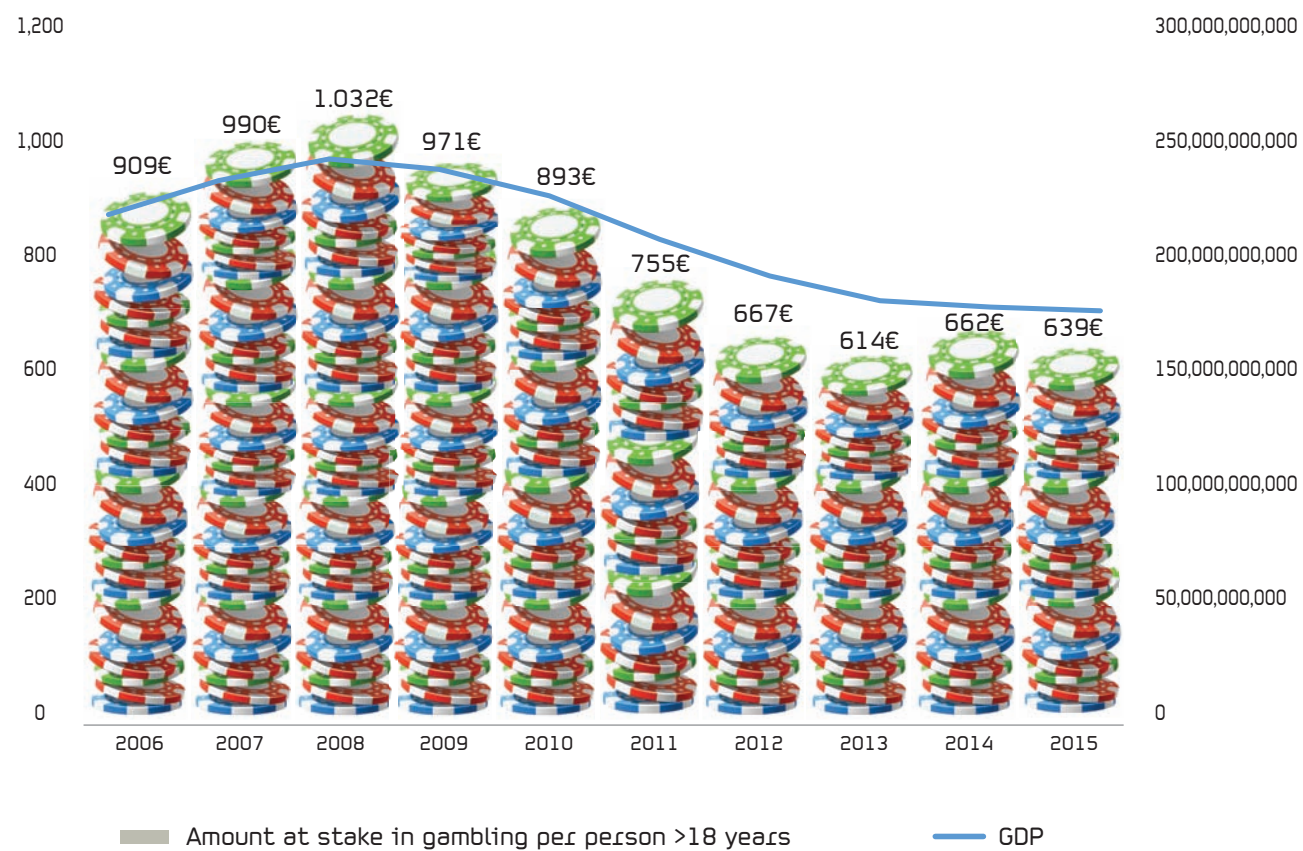
Gambling expenditure per person aged 18 years³ or over followed along the same downward line as revenue and, actually, at a higher rate of decrease, with the exception of 2008 and 2014 when it went up as opposed to the rate of change in revenue.



3. Source: Hellenic Statistical Authority - Estimated population as at 1st January each year.

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

The following table illustrates the stake (wager) per person aged 18 years or over (>18), which followed the same course as GDP during the period examined. It peaked in 2008 and had been following a downward course ever since, with the exception of 2014, to reach 639 euros in 2015.



Similar change was seen in the gambling expenditure per person aged 18 years or over. This expenditure represents the amount of money that the players finally lose.

Gambling expenditure per person (>18 years)



2.1.2 GAMBLING MARKET INCLUDING ONLINE GAMBLING: GREECE AND EU28

In 2015 the total gross gaming revenue generated by the gambling market in Greece was 1,726,473,268 euros. This amount includes online gambling gross revenue, as shown by the data declared to the HGC by twenty-one (21) out of the twenty-four (24) companies which are subject to the transitional regime of paragraph 12, Article 50 of Law 4002/2011 (GG Series A, No. 180).

The gross win generated by the gambling market contributed by 0.98% to the total gross domestic product (GDP), while the equivalent contribution of gross win to GDP in the EU Member States (EU28) was 0.59%.

YEAR 2015	Gross Revenue	GDP	Contribution of GGR generated by the gambling market to GDP
EU28 (land-based)	73,080,000,000 €	14,625,372,900,000 ⁴ €	0.50%
EU28 (online)	13,270,000,000 €		0.09%
EU 28 Total	86,350,000,000 ⁵ €		0.59%

4. Source: Eurostat. The data on GDP refers to current prices.

5. Source: European Gaming & Betting Association. Retrieved from: http://www.egba.eu/media/FACTSHEET_MARKET_REALITY.pdf

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

YEAR 2015	Gross Revenue	GDP	Contribution of GGR generated by the gambling market to GDP
Greece (land-based)	1,610,273,033 €	176,022,700,000 ⁶ €	0.91%
Greece (online)	116,200,235 €		0.07%
Greece Total	1,726,473,268 €		0.98%

If we compare the two individual gambling markets in 2015, we see that in Greece the land-based market had a more significant contribution to GDP (0.91%) in relation to that of the same market in EU28 (0.50%). Online gambling market contribution to GDP in the two cases compared is 0.07% for Greece and 0.09% for EU28.

The following table illustrates the gambling expenditure per person aged 18 years or over (>18) in Greece and EU28.

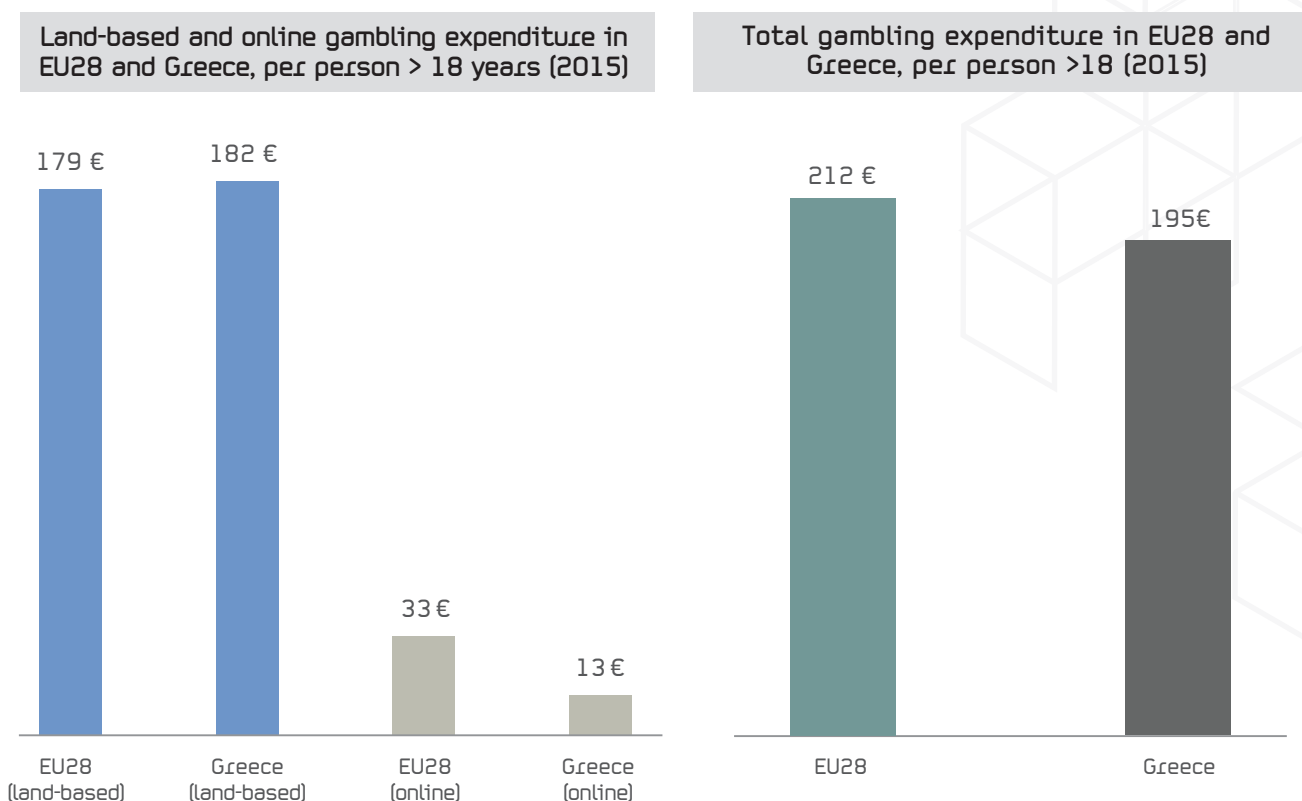
YEAR 2015	Gross Revenue	Population >18	Gambling expenditure per person >18
EU28 (land-based)	73,080,000,000 €	407,534,878 ⁷	179 €
EU28 (online)	13,270,000,000 €		33 €
EU 28 Total	86,350,000,000 €		212 €
Greece (land-based)	1,610,273,033 €	8,850,665 ⁸	182 €
Greece (online)	116,200,235 €		13 €
Greece Total	1,726,473,268 €		195 €

It is noted that per capita expenditure on land-based gambling was 182€ in Greece in 2015 while the European average amounted to 179€. The equivalent per capita expenditure on online gambling was 13€ in Greece versus 33€ reported for EU28. Total gambling expenditure was 195€ in Greece and 212€ in EU28.

6. Source: Hellenic Statistical Authority - Annual National Accounts/Gross Domestic Product 2015 (provisional data)

7. Source: Eurostat. Population estimate March 2016.

8. Source: Hellenic statistical Authority. Population estimate January 2016.



2.1.3 STATE REVENUE RAISED FROM GAMBLING

The distribution of State revenue raised from the operation of games of chance, per category, is as follows:

- Licensing Revenue.
- Revenue in the form of a share of gross gaming revenue (gross profit - GGR).
- Revenue from casino players' tickets.
- Tax revenue from winnings.

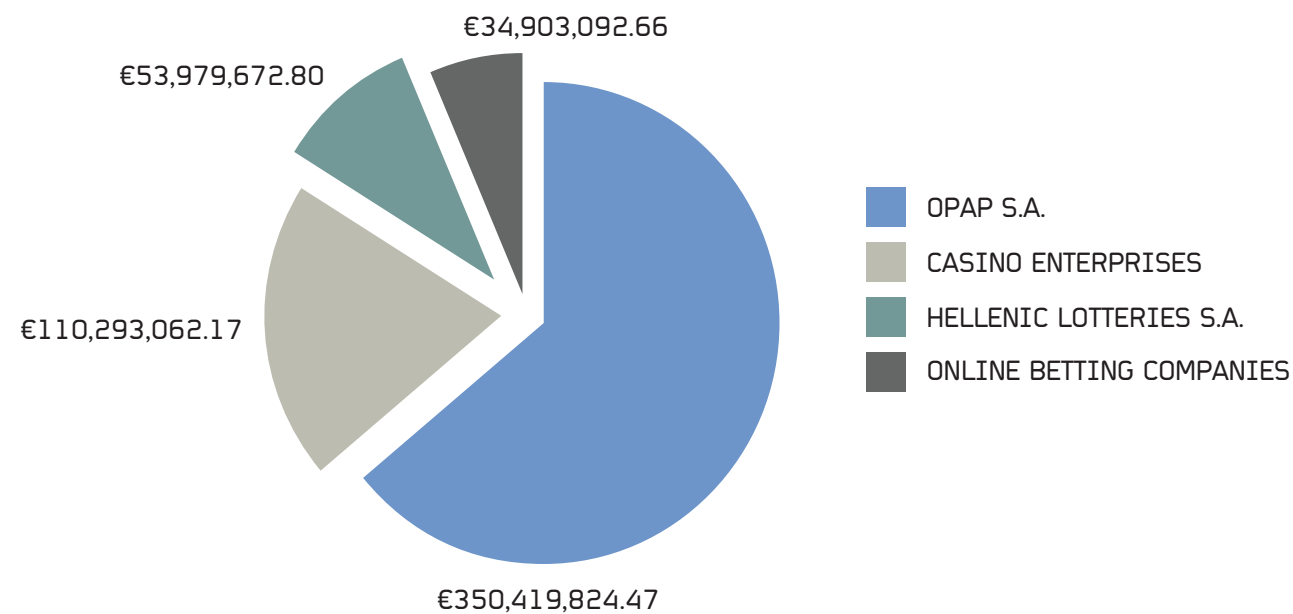
By virtue of paragraph 5 article 50 of Law 4002/2011 (GG Series A, No. 180), the Greek State's share of gross gaming revenue (gross profit - GGR) generated in Greece is set at thirty percent (30%).

These provisions apply to all providers with the exception of casino enterprises, which have a different percentage as a result of the relevant licensing tender and, in some cases, of further modifications there to at a later stage.

On the basis of its responsibilities, the HGC oversees the collection of the Greek State's share of gross gaming revenue. As regards the twenty-four (24) gambling operators subject to the transitional regime of paragraph 12, Article 50 of Law 4002/2011 (GG Series A, No. 180), the responsibility for

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

State Revenue from gambling operators in 2015



the audit and collection of state revenue lies with the Ministry of Finance and, in particular, the tax authorities.

Gaming revenue and gross profit amounted to 549,595,652 euros in 2015. These are broken down by provider and analyzed in the relevant chart.

It should be noted that the amount of 34,903,093 euros that represents the State's share of online gambling gross revenue is derived from the self-declared data provided to the HGC by twenty-one (21) out of the twenty-four (24) gambling operators subject to the transitional regime of paragraph 12, Article 50 of Law 4002/2011 (GG Series A, No. 180).

The amount of 110,293,062 euros originated in the casinos includes state revenue from the special annual operation duty and from tickets, as well as from the rights of municipalities on gross profit made by local casinos, which account for 25,183,887 euros.

Last but not least, the above state revenue does not include any revenue from horse racing betting, due to the lack of data.

2.2 EVOLUTION OF THE GREEK GAMBLING MARKET

The data presented in this section does not include the financial data of online gambling service providers, which would allow a comparative analysis for the period 2006-2015.

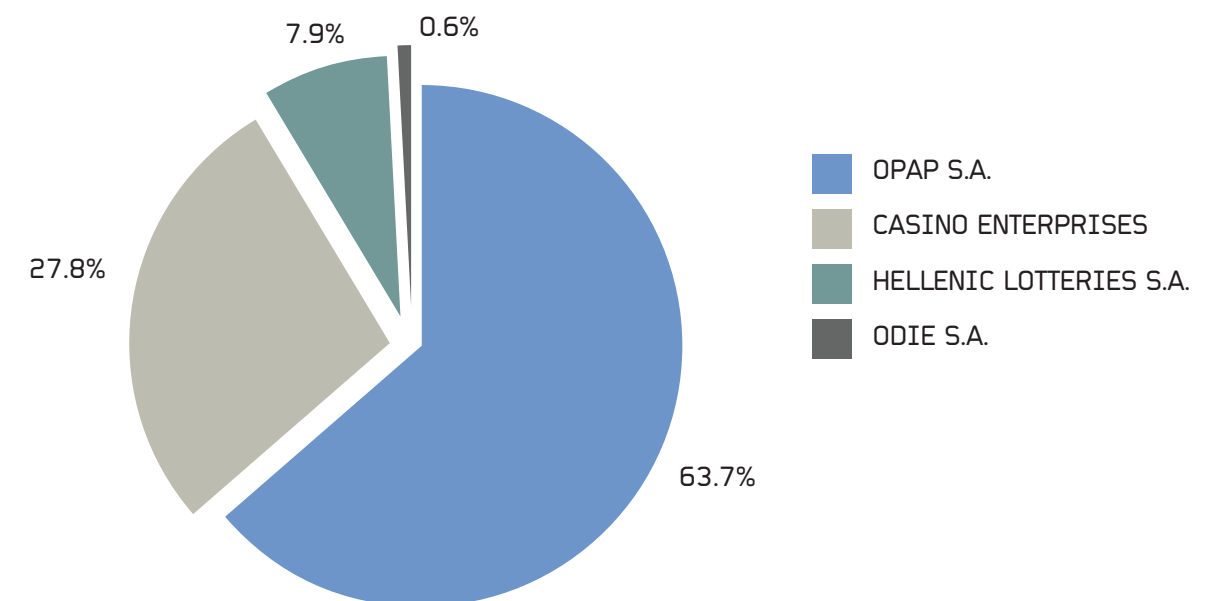
2.2.1 TOTAL GAMBLING TURNOVER IN 2006-2015

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

Gambling market turnover was 5,659,137,900 euros in 2015 and is broken down per provider as follows:

PROVIDER	TURNOVER 2015
OPAP S.A.	3,603,418,939
CASINO ENTERPRISES	1,571,402,581
HELLENIC LOTTERIES S.A.	449,567,165
ODIE S.A.	34,749,215
TOTAL	5,659,137,900

Providers' share of gambling turnover in 2015



2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

In the year 2015, the regulated gambling market experienced a limited fall of 3.9% in relation to the year before. However, it performed better than in 2013 with its historic low of 5,495,241,086 euros, but not as well as in 2008, when it reached 9,239,831,836 euros.

In the period 2006-2015 gambling turnover was on the decline, with the exception of the years 2006-2008 and 2014, which lead to an overall decrease of 29.8%. The decrease is even larger (38.8%) if we compare the market figures of 2015 with those of 2008.

The highest annual rate of change was seen in 2011 and 2012, when the gambling market shrunk by 15.2% and 12.0% respectively.

YEAR	GAMBLING MARKET	PERCENTAGE CHANGE
	Turnover (in euros)	
2006	8,062,091,819	-
2007	8,821,942,576	9.4%
2008	9,239,831,836	4.7%
2009	8,739,482,829	-5.4%
2010	8,064,537,555	-7.7%
2011	6,835,277,700	-15.2%
2012	6,013,674,926	-12.0%
2013	5,495,241,086	-8.6%
2014	5,888,952,747	7.2%
2015	5,659,137,900	-3.9%

The total decline in gambling turnover in 2015 is due to a drop in the sales of all providers, which ranged between 1.8% and 24.5%.

In particular, the smallest reduction was seen in the total of casino enterprises, which was 1.8%, followed by OPAP S.A. with a reduction of 4.2% and Hellenic Lotteries S.A. with 6.3%. The most significant fall was reported by ODIE S.A.

The following table presents the evolution of gambling turnover per provider in Greece along with its percentage change for the period 2006-2015.

YEAR	OPAP S.A. ⁹		CASINO ENT. ¹⁰		STATE LOTTERIES ¹¹		ODIE S.A. ¹²	
	Turnover (in euros)	%	Turnover (in euros)	%	Turnover (in euros)	%	Turnover (in euros)	%
2006	4,524,105,000		2,782,951,157		417,518,270		337,517,392	
2007	4,929,708,000	9.0%	3,199,376,056	15.0%	409,708,870	-1.9%	283,149,650	-16.1%
2008	5,328,100,000	8.1%	3,184,877,971	-0.5%	430,098,800	5.0%	296,755,065	4.8%
2009	5,222,199,000	-2.0%	2,839,587,829	-10.8%	417,601,000	-2.9%	260,095,000	-12.4%
2010	4,937,530,000	-5.5%	2,585,936,555	-8.9%	347,638,000	-16.8%	193,433,000	-25.6%
2011	4,172,459,000	-15.5%	2,239,462,700	-13.4%	299,894,000	-13.7%	123,462,000	-36.2%
2012	3,775,251,000	-9.5%	1,890,156,056	-15.6%	263,879,870	-12.0%	84,388,000	-31.6%
2013	3,504,294,000	-7.2%	1,687,698,396	-10.7%	238,226,690	-9.7%	65,022,000	-22.9%
2014	3,759,712,676	7.3%	1,599,943,054	-5.2%	479,574,260	101.3%	49,722,757	-23.5%
2015	3,603,418,939	-4.2%	1,571,402,581	-1.8%	449,567,165	-6.3%	34,749,215	-30.1%

Throughout the period 2006-2015, OPAP S.A. had the biggest gambling market share followed by the nine (9) casino enterprises, HELLENIC LOTTERIES S.A. and ODIE S.A.

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

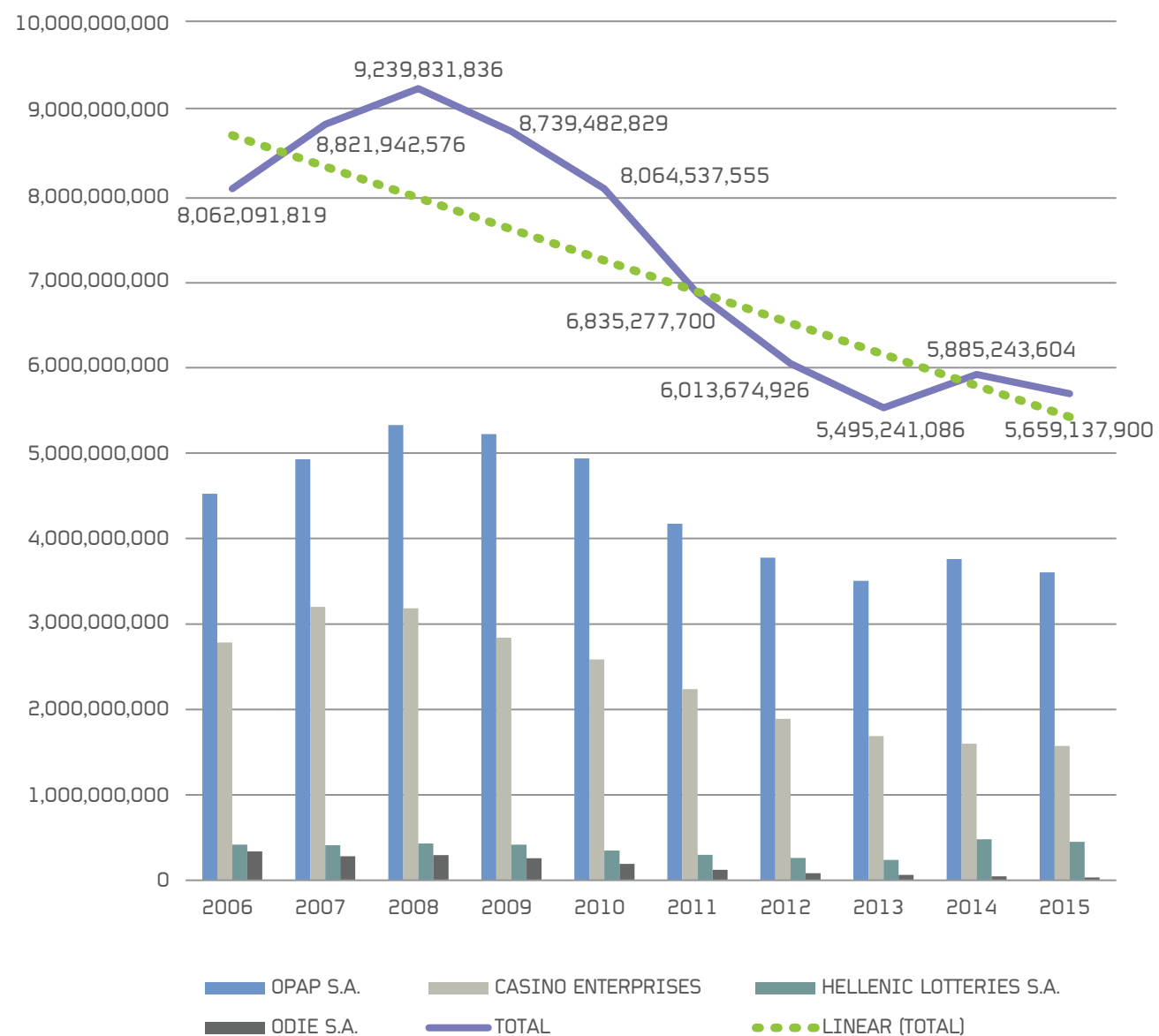
10. The turnover of casinos is the money that players turn into drops and refers to the nine casino enterprises of Greece. The data for the years 2006-2012 was provided by the Ministry of Tourism-Directorate of Casino Supervision, while that for the years 2013-2015 was given by the HGC services.

11. The data on the turnover of Hellenic Lotteries S.A. for the years 2006-2013 was taken from the annual financial statements of the Directorate of State Lotteries. The data on turnover for the year 2014 comes from the provisional data of the Directorate of State Lotteries for the period January-April 2014 and of Hellenic Lotteries S.A. for the period May-December 2014. The turnover for the year 2015 was derived from the data provided to the HGC by Hellenic Lotteries S.A.

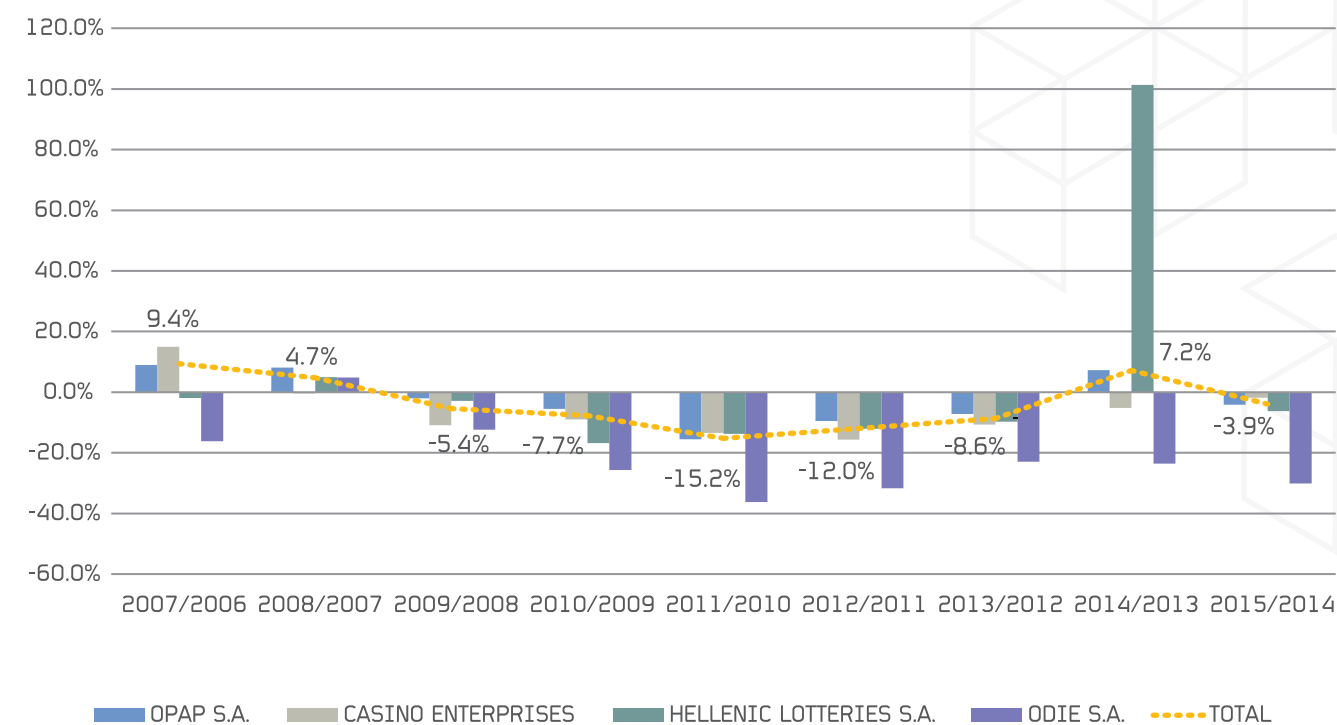
12. The data on turnover of ODIE S.A. for the years 2006-2013 was taken from the annual financial statements. The turnover for the years 2014-2015 was taken from the data provided to the HGC by ODIE S.A.

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

Evolution of gambling turnover (2006-2015)



Rate of change in gambling turnover (2006-2015)



2.2.2 GROSS REVENUE OF THE GAMBLING MARKET IN 2006-2015

Gross Gaming Revenue (gross profit) or (GGR) is equal to Total Gambling Turnover less winnings.

In 2015 gross gaming revenue registered a fall of 3.6% in relation to 2014 and followed the same trend as turnover. However, gross gaming revenue was higher in 2015 when compared to the historic low reported for 2013, but much lower than in 2008, when it reached 2,750,091,782 euros.

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

ΕΤΟΣ	GAMBLING MARKET	PERCENTAGE CHANGE
	Gross Revenue (in euros)	
2006	2,438,122,888	-
2007	2,539,315,886	4.2%
2008	2,750,091,782	8.3%
2009	2,539,149,638	-7.7%
2010	2,264,010,978	-10.8%
2011	1,907,467,435	-15.7%
2012	1,683,046,995	-11.8%
2013	1,555,525,006	-7.6%
2014	1,670,715,091	7.4%
2015	1,610,273,033	-3.6%

The highest annual rate of change was seen in 2011 and 2012, when the gambling market shrunk by 15.7% and 11.8% respectively.

The total decline in gross gaming revenue in 2015 is due to a drop in the gross revenue of all providers, which ranged between 2.6% and 34.3%.

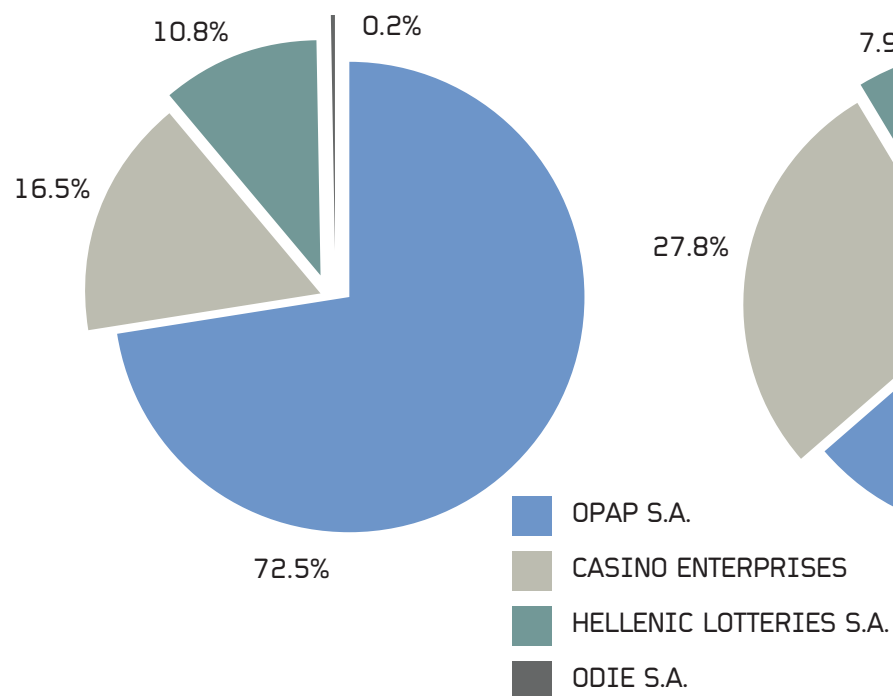
In particular, the smallest reduction was seen in ODIE S.A. and it reached 2.6%. Casino enterprises follow with a decrease of 3.8% and then Hellenic Lotteries S.A. with 8.8%. The most significant fall was reported by OPAP S.A.

The distribution of gross revenue per provider in 2015 is as follows: OPAP S.A. accounts for 72.5%, casino enterprises for 16.5%, Hellenic Lotteries for 10.8% and, finally, ODIE S.A. for 0.2%. It should be noted that although the ranking of providers according to their gross revenue is equivalent to their ranking according to their turnover, their shares of gross gaming revenue are smaller than those of casino enterprises and ODIE S.A. and bigger than those of OPAP S.A. and Hellenic Lotteries S.A.

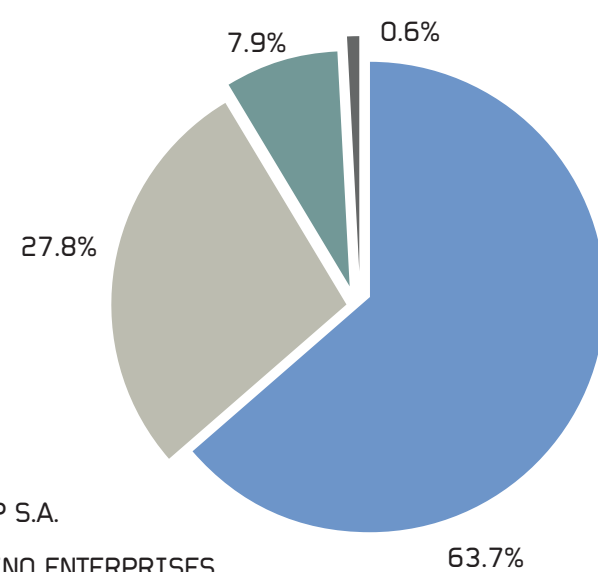
If we exclude the period 2006-2008 and the year 2014, gross gaming revenue has been constantly going down. In a period of two years, the greatest loss of gross revenue was reported by ODIE S.A. (92.4%), casino enterprises (61.5%) and then OPAP S.A. (23.2%). The only exception is Hellenic Lotteries S.A. which reported a rise of 7.8% in its gross revenue.

The evolution of gross gaming revenue per provider in Greece along with its percentage change in the period 2006-2015 is depicted in the following table.

Gross revenue per provider in 2015

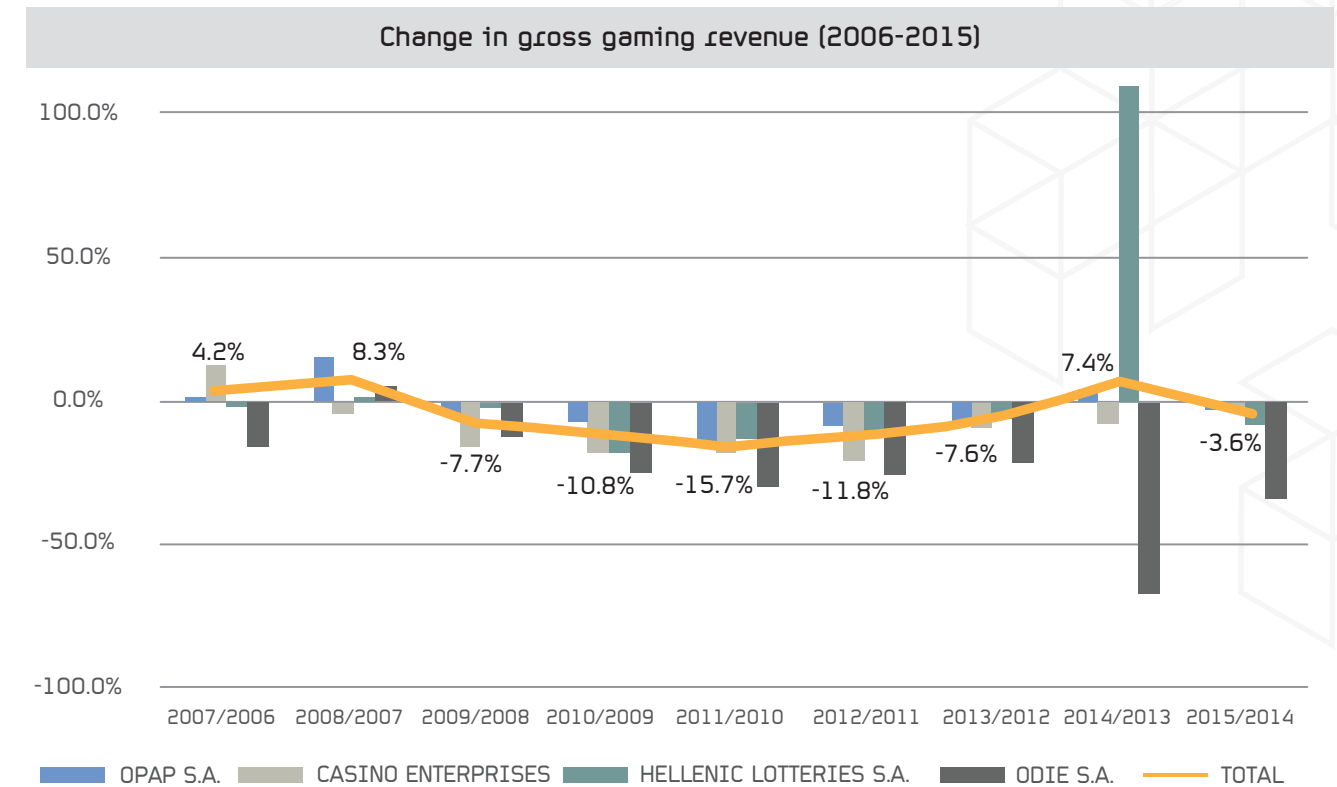
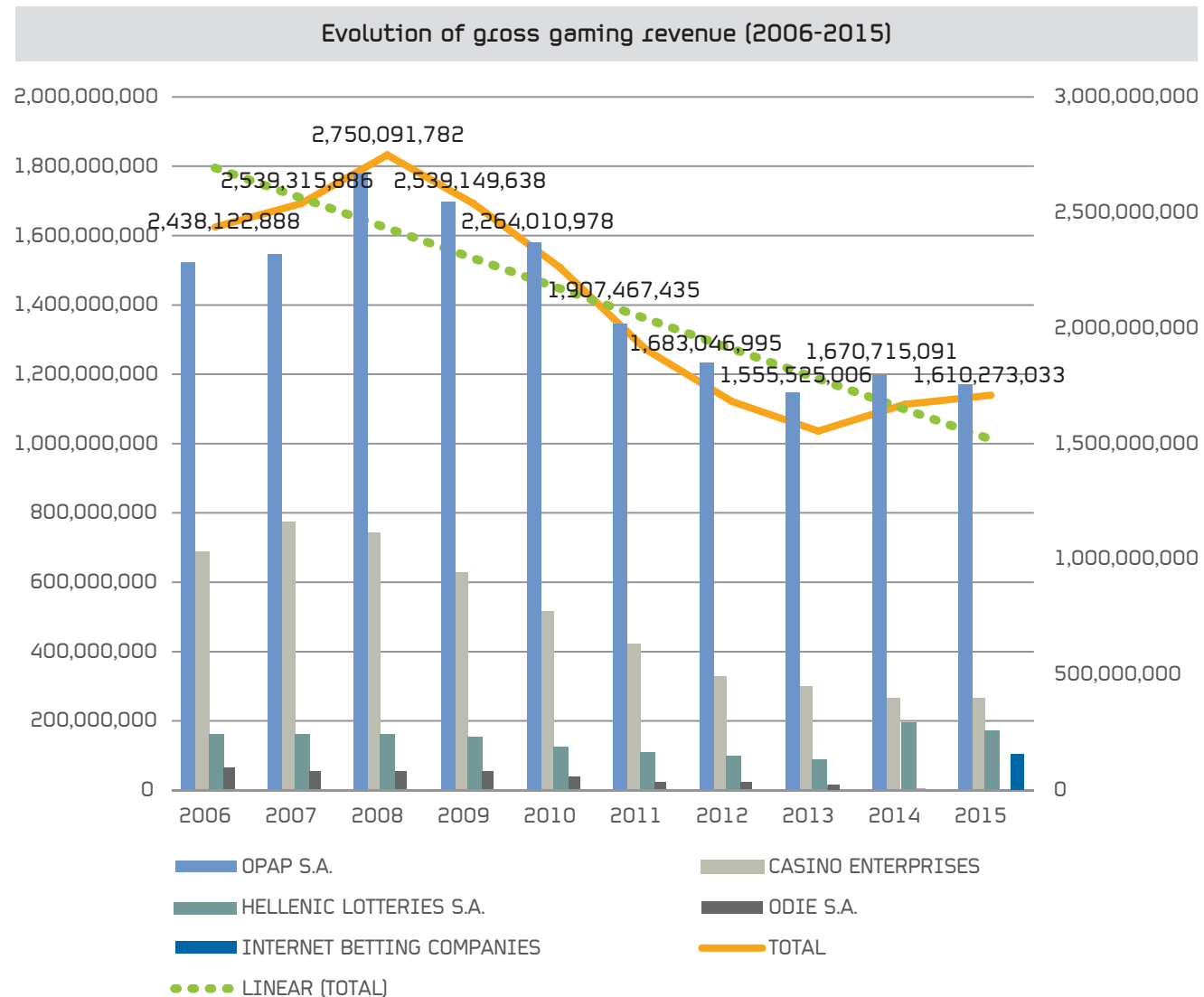


Turnover per provider in 2015



Year	OPAP S.A.		CASINO ENTER.		HELL. LOTTERIES S.A.		ODIE S.A.	
	Gross Revenue (in euros)	Change %	Gross Revenue (in euros)	Change %	Gross Revenue (in euros)	Change %	Gross Revenue (in euros)	Change %
2006	1,521,226,000		688,109,951		161,283,459		67,503,478	
2007	1,547,956,000	1.8%	776,744,651	12.9%	157,985,305	-2.0%	56,629,930	-16.1%
2008	1,786,093,000	15.4%	744,501,239	-4.2%	160,035,658	1.3%	59,461,885	5.0%
2009	1,704,426,000	-4.6%	626,074,105	-15.9%	156,536,000	-2.2%	52,113,533	-12.4%
2010	1,582,854,000	-7.1%	513,434,978	-18.0%	128,486,000	-17.9%	39,236,000	-24.7%
2011	1,348,933,000	-14.8%	419,720,435	-18.3%	111,385,000	-13.3%	27,429,000	-30.1%
2012	1,235,082,000	-8.4%	330,168,995	-21.3%	97,509,000	-12.5%	20,287,000	-26.0%
2013	1,150,146,000	-6.9%	298,665,006	-9.5%	90,898,000	-6.8%	15,816,000	-22.0%
2014	1,199,603,000	4.3%	275,273,290	-7.8%	190,709,020	109.8%	5,129,781	-67.6%
2015	1,168,066,081	-2.6%	264,940,845	-3.8%	173,894,656	-8.8%	3,371,451	-34.3%

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET



2.3 GAMBLING OPERATORS AND GAMES OF CHANCE

In 2015, games of chance were operated in Greece by:

- The Greek Organization of Football Prognostics (OPAP S.A.), which operates most gambling games.
- Nine (9) casino enterprises, carrying out operations in various parts of the country.
- «Hellenic Lotteries S.A.»
- The «Hellenic Horse Racing Organization S.A.» (ODIE S.A.)
- The twenty-four (24) undertakings providing online gambling and betting services which are subject to the transitional regime of paragraph 12, Article 50 of Law 4002/2011 (GG Series A, No. 180).

2.3.1 THE «GREEK ORGANIZATION OF FOOTBALL PROGNOSTICS S.A.» (OPAP S.A.)

OPAP SA was established in 1958 as a legal entity of public law. In 1999 it became a public limited company under the trade name OPAP S.A., while in October 2013, the privatization of OPAP S.A. was completed with the sale of 33% of its share capital, i.e. the share belonging to the Greek State.

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

OPAP S.A. has the exclusive rights for a series of gambling and betting services of pre-defined or non pre-defined yield and provides these services through a network of 4,739 agencies¹³.

The exclusive rights to carry out the gaming services provided by OPAP SA were granted in 2000 by virtue of Article 27 of Law 2843/2000 (GG Series A, 219), under a 20-year contract, which was renewed in August 2011 until year 2030 for all games apart from online betting.

By virtue of the provisions and conditions set out in articles 39 et seq. of Law 4002/2011 (GG Series A, No. 180), as amended and in force, the company was granted a license to install and operate 35,000 gaming machines for land-based gambling (through its agencies). According to the above provisions, 16,500 of those gaming machines will be installed and operated by OPAP S.A. itself, while the remaining 18,500 will be operated by 4 to 10 concessionaires, who will be declared the highest bidders in an international tender launched by OPAP S.A. These gaming machines have not started operating yet.

OPAP S.A. currently operates various categories of games of chance, some depending exclusively on luck and others on the ability to predict, some being mutual games and others games of fixed (pre-defined) yield.

The categories of games are:

NUMERICAL LOTTERIES	PREDICTION GAMES
Pre-defined yield	Pre-defined yield
- Kino - Extra 5 - Super 3 - Go Lucky	- Pame Stoixima - Monitor Games
Mutual	Mutual
- Joker - Lotto - PROTO	- PROPO - PROPOGOAL

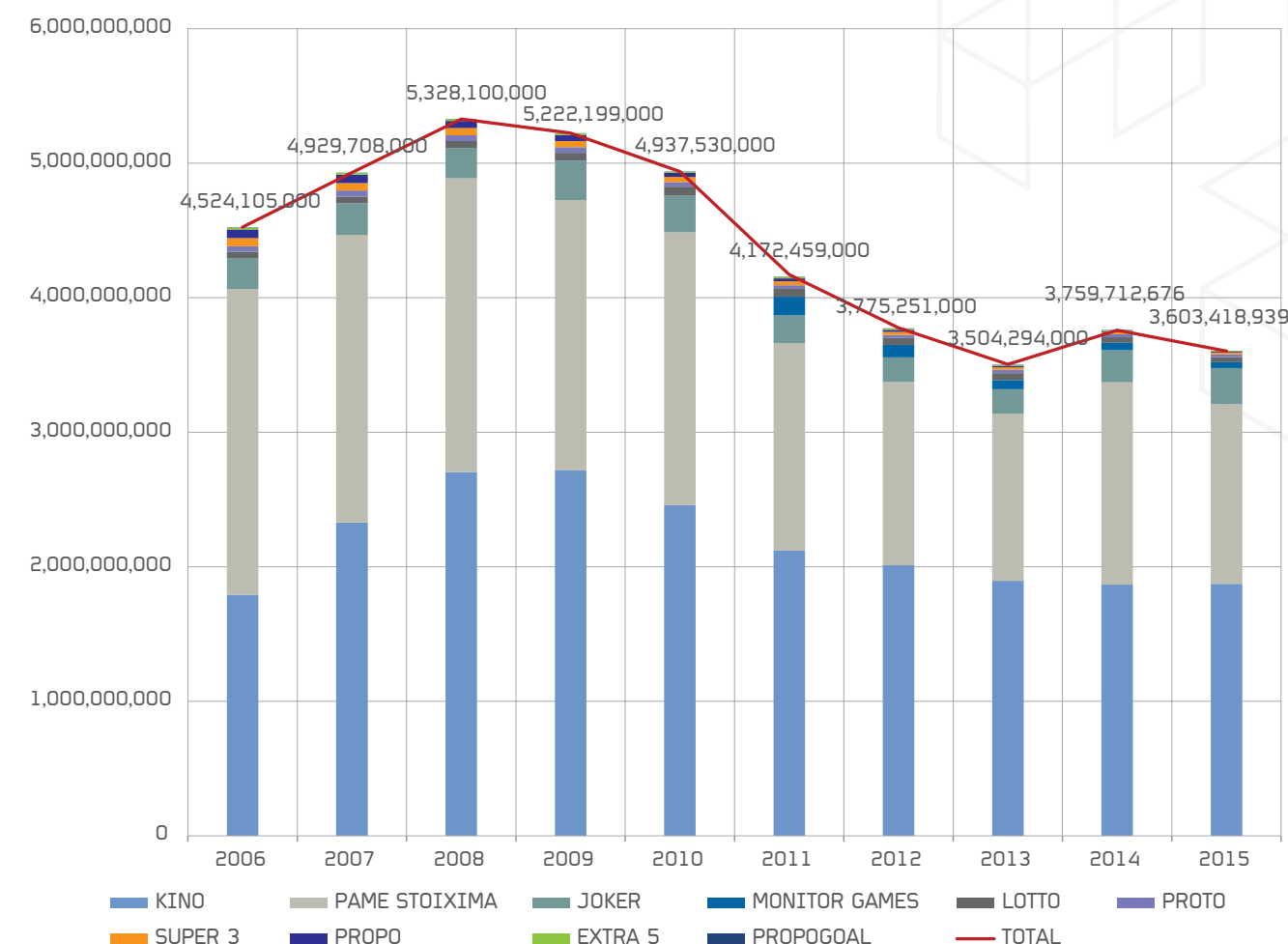
OPAP S.A. is also licensed to operate the numerical lottery «BINGO-LOTTO». This game has not started yet.

The permanent staff employed by OPAP S.A. on 31.12.2014 was six hundred and four (604) people. On 31.12.2015 they had increased by one hundred and thirty-three (133) people to seven hundred and thirty-seven (737)¹⁴.

The following chart presents the evolution of turnover, per game, for OPAP S.A. in the ten-year period 2006-2015. In 2015, the total gambling turnover of OPAP S.A. went down by 4.2% in relation to the year before and by 20.4% in the period 2006-2015. The decrease was even more significant in relation to 2008 when the gambling market registered the highest performance of the last

decade. Specifically, it was 3,603,418,939 euros in 2015 as opposed to 3,759,712,676 euros in the previous year and 5,328,100,000 euros in 2008.

Evolution of the gambling turnover of OPAP S.A. (2006-2015)



JOKER and KINO are the only games that have seen a slight growth in their turnover in 2015 in relation to 2014. It is worth noting that these two games have grown by 4.6% and 18.3% respectively over the last decade.

By contrast, PAME STOIXIMA has seen a decrease by 41.3% in the last ten years.

The remaining games reported losses ranging between 0%-60% in the period 2006-2015. However, these games have a small contribution to total gambling turnover (4.67%).

The following tables present the evolution of the gambling turnover of OPAP S.A. along with its percentage change in the period 2006-2015 on an annual basis.

13. Information taken from the website of OPAP S.A. (08.03.2015), <http://www.opap.gr/el/web/corporate.opap.gr/newretailpage>

14. Source: Data provided to the HGC by ODIE S.A.

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AN OVERVIEW OF THE GREEK GAMBLING MARKET

TOTAL GAMBLING TURNOVER OF OPAP S.A. 2006-2015											(in euros)
GAMES	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	TOTAL
KINO	1,790,532,000	2,328,845,000	2,703,256,000	2,719,836,000	2,457,296,000	2,118,340,000	2,011,111,000	1,896,176,000	1,867,300,400	1,872,639,971	21,765,332,371
PAME STOIXIMA	2,272,825,000	2,137,982,000	2,185,079,000	2,004,930,000	2,029,406,000	1,543,633,000	1,361,881,000	1,239,977,000	1,503,062,127	1,334,471,978	17,613,247,105
JOKER	227,444,000	235,200,000	224,422,000	294,027,000	273,746,000	206,987,000	183,964,000	182,901,000	238,556,020	269,153,033	2,336,400,053
MONITOR GAMES	-	-	-	-	-	137,633,000	92,661,000	68,070,000	54,405,445	44,226,884	396,996,329
LOTTO	48,940,000	50,146,000	50,940,000	57,647,000	65,132,000	59,326,000	50,066,000	52,680,000	42,906,432	37,140,214	514,923,646
PROTO	42,510,000	44,305,000	44,527,000	43,119,000	34,468,000	25,800,000	22,951,000	25,615,000	22,981,682	21,136,399	327,413,081
SUPER 3	60,942,000	55,471,000	52,332,000	44,898,000	36,456,000	30,685,000	22,413,000	16,726,000	14,724,111	13,228,867	347,875,978
PROPO	64,035,000	63,124,000	54,167,000	45,169,000	30,277,000	21,895,000	15,747,000	12,419,000	7,900,854	5,331,185	320,065,039
EXTRA 5	15,430,000	13,007,000	12,087,000	11,474,000	10,060,000	9,840,000	8,609,000	7,123,000	6,520,970	5,558,301	99,709,271
GO LUCKY	-	-	-	-	-	17,293,000	4,711,000	1,650,000	926,724	-	24,580,724
PROPOGOAL	1,447,000	1,628,000	1,290,000	1,099,000	689,000	1,027,000	1,137,000	957,000	427,913	532,108	10,234,021
TOTAL	4,524,105,000	4,929,708,000	5,328,100,000	5,222,199,000	4,937,530,000	4,172,459,000	3,775,251,000	3,504,294,000	3,759,712,676	3,603,418,939	43,756,777,615

PERCENTAGE CHANGE IN THE TOTAL GAMBLING TURNOVER OF OPAP S.A. YEARLY											
GAMES	2007/2006	2008/2007	2009/2008	2010/2009	2011/2010	2012/2011	2013/2012	2014/2013	2015/2014	2015/2008	2015/2006
KINO	30.1%	16.1%	0.6%	-9.7%	-13.8%	-5.1%	-5.7%	-1.5%	0.3%	-30.7%	4.6%
PAME STOIXIMA	-5.9%	2.2%	-8.2%	1.2%	-23.9%	-11.8%	-9.0%	21.2%	-11.2%	-38.9%	-41.3%
JOKER	3.4%	-4.6%	31.0%	-6.9%	-24.4%	-11.1%	-0.6%	30.4%	12.8%	19.9%	18.3%
MONITOR GAMES	-	-	-	-	-	-32.7%	-26.5%	-20.1%	-18.7%	-	-67.9% ¹⁵
LOTTO	2.5%	1.6%	13.2%	13.0%	-8.9%	-15.6%	5.2%	-18.6%	-13.4%	-27.1%	-24.1%
PROTO	4.2%	0.5%	-3.2%	-20.1%	-25.1%	-11.0%	11.6%	-10.3%	-8.0%	-52.5%	-50.3%
SUPER 3	-9.0%	-5.7%	-14.2%	-18.8%	-15.8%	-27.0%	-25.4%	-12.0%	-10.2%	-74.7%	-78.3%
PROPO	-1.4%	-14.2%	-16.6%	-33.0%	-27.7%	-28.1%	-21.1%	-36.4%	-32.5%	-90.2%	-91.7% ¹⁶
EXTRA 5	-15.7%	-7.1%	-5.1%	-12.3%	-2.2%	-12.5%	-17.3%	-8.5%	-14.8%	-54.0%	-64.0%
GO LUCKY	-	-	-	-	-	-72.8%	-65.0%	-43.8%	-	-	-94.6% ¹⁶
PROPOGOAL	12.5%	-20.8%	-14.8%	-37.3%	49.1%	10.7%	-15.8%	-55.3%	24.3%	-58.8%	-63.2%
TOTAL	9.0%	8.1%	-2.0%	-5.5%	-15.5%	-9.5%	-7.2%	7.3%	-4.2%	-32.4%	-20.4%

15. Refers to the period 2011-2015

16. Refers to the period 2011-2013

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

The following table presents the percentage share of total gambling turnover that the OPAP S.A. games had in the period 2006-2015.

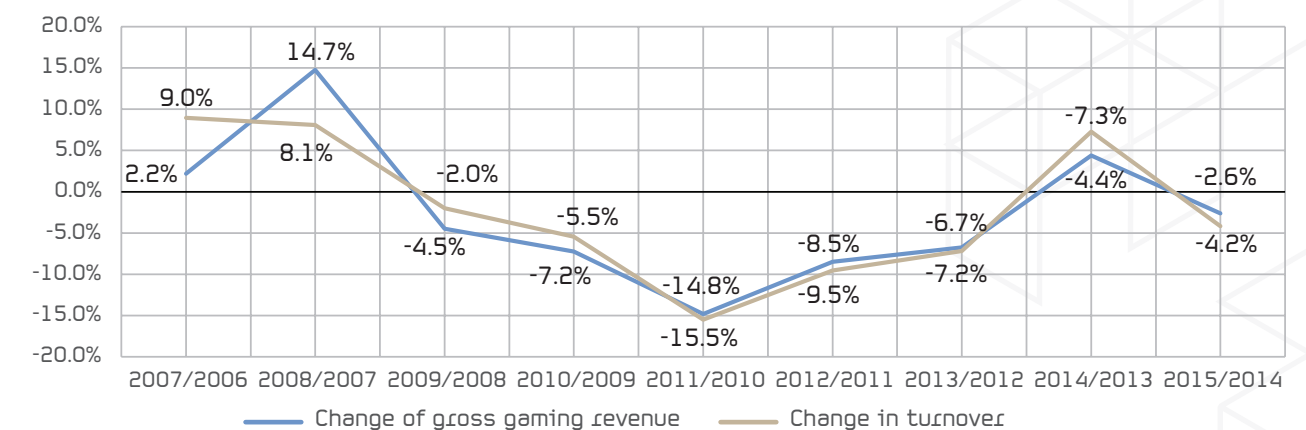
PERCENTAGE SHARE OF GAMBLING TURNOVER FOR OPAP S.A. IN 2006-2015											
2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	TOTAL	ΣΥΝΟΛΟ
KINO	39.58%	47.24%	50.74%	52.08%	49.77%	50.77%	53.27%	54.11%	49.67%	51.97%	49.74%
PAME STOIXIMA	50.24%	43.37%	41.01%	38.39%	41.10%	37.00%	36.07%	35.38%	39.98%	37.03%	40.25%
JOKER	5.03%	4.77%	4.21%	5.63%	5.54%	4.96%	4.87%	5.22%	6.35%	7.47%	5.34%
MONITOR GAMES	0.00%	0.00%	0.00%	0.00%	0.00%	3.30%	2.45%	1.94%	1.45%	1.23%	0.91%
LOTTO	1.08%	1.02%	0.96%	1.10%	1.32%	1.42%	1.33%	1.50%	1.14%	1.03%	1.18%
PROTO	0.94%	0.90%	0.84%	0.83%	0.70%	0.62%	0.61%	0.73%	0.61%	0.59%	0.75%
SUPER 3	1.35%	1.13%	0.98%	0.86%	0.74%	0.74%	0.59%	0.48%	0.39%	0.37%	0.80%
PROPO	1.42%	1.28%	1.02%	0.86%	0.61%	0.52%	0.42%	0.35%	0.21%	0.15%	0.73%
EXTRA 5	0.34%	0.26%	0.23%	0.22%	0.20%	0.24%	0.23%	0.20%	0.17%	0.15%	0.23%
GO LUCKY	0.00%	0.00%	0.00%	0.00%	0.00%	0.41%	0.12%	0.05%	0.02%	0.00%	0.06%
PROPOGOAL	0.03%	0.03%	0.02%	0.02%	0.01%	0.02%	0.03%	0.03%	0.01%	0.01%	0.02%
TOTAL	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

The most popular games of OPAP S.A. are KINO, PAME STOIXIMA and JOKER. The share of total gambling turnover that the above games have is 95.30%.

Over the last decade, KINO and JOKER have seen their share of players' preferences increase, as opposed to PAME STOIXIMA (including online) which has decreased gradually. Specifically, KINO's percentage share of total turnover has gone up from 39.94% in 2006 to 51.97% in 2015 and reached 49.74% for the whole decade. JOKER's share has increased from 5.03% (2006) to 7.47% (2015), thus contributing to the turnover of OPAP S.A. by 5.34% in a period of ten years. By contrast, in the same period PAME STOIXIMA's percentage share fell from 50.24% in 2006 to 37.03% in 2015, thus accounting for 40.25% of the company's turnover in these ten years.

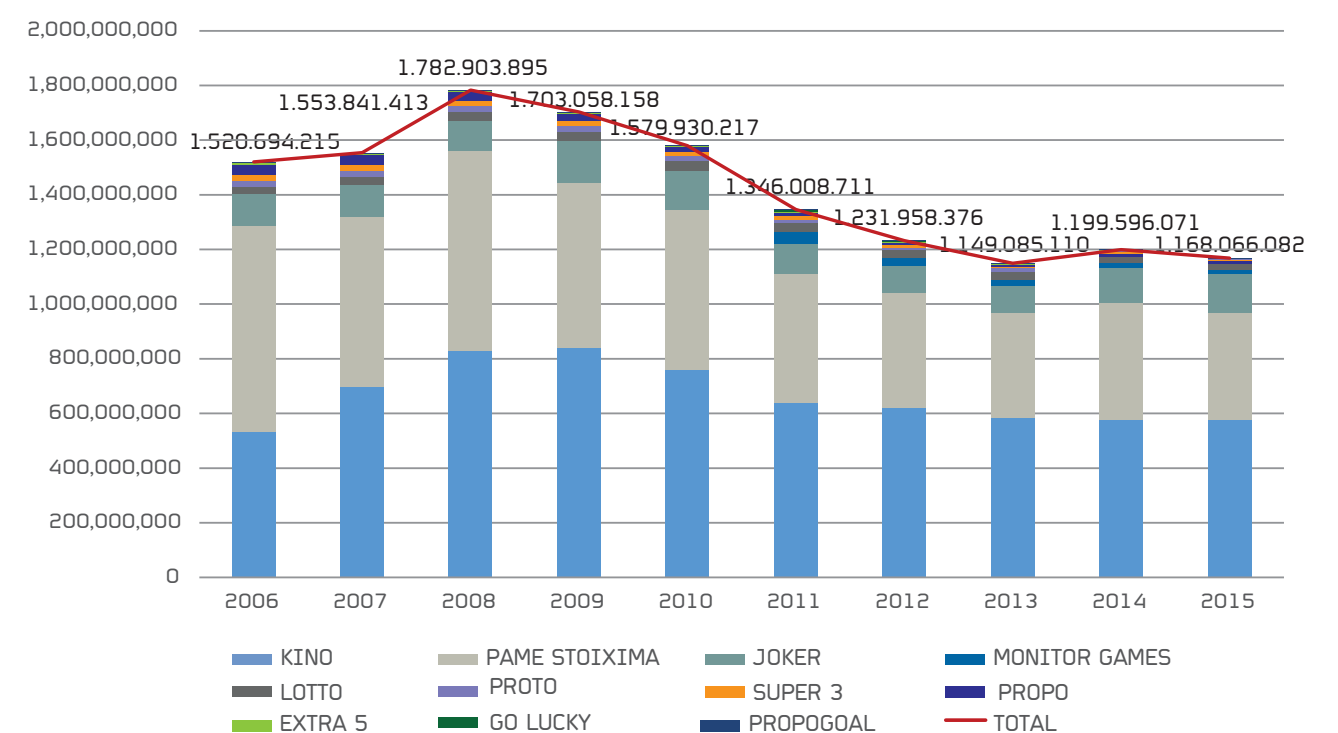
Gross gaming revenue of OPAP S.A. does not differ significantly from its turnover in the period 2006-2015.

Evolution of the change in turnover & gross gaming revenue of OPAP S.A.



As regards the three most popular games of OPAP S.A.: gross revenue from KINO increased by 8.3%; JOKER, despite some fluctuations, has grown significantly by 24.7% these ten years; PAME STOIXIMA was on the decline throughout the period examined, with the exception of 2014, and lost 48.1% of its gross revenue. The change in the remaining games was negative, however, these games account for less than 7% of the total gross revenue generated in that period.

Evolution of the gross gaming revenue of OPAP S.A. (2006-2015)



2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

The following tables provide details on the percentage change and each game's share of total gross revenue:

GROSS GAMING REVENUE OF OPAP S.A. 2006-2015 (amounts in euros)											
GAMES	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	TOTAL
KINO	532,949,313	698,861,334	829,897,586	839,975,233	760,662,848	640,041,707	620,217,933	582,942,344	578,044,581	576,973,012	6,660,565,890
PAME STOIXIMA	754,962,708	619,788,230	729,695,324	602,053,596	582,561,133	472,168,150	421,747,260	386,956,629	427,717,971	392,176,939	5,389,827,940
JOKER	113,722,149	117,600,161	112,210,752	156,486,267	145,090,438	110,040,713	98,138,511	97,181,224	126,591,885	141,848,016	1,218,910,116
MONITOR GAMES	-	-	-	-	-	41,926,221	28,937,896	21,205,059	16,960,043	13,756,682	122,785,901
LOTTO	29,559,995	30,288,105	30,767,948	33,562,473	36,978,451	34,099,379	28,088,494	30,750,845	25,461,304	22,292,385	301,849,379
PROTO	20,064,535	20,911,992	21,016,627	20,702,043	17,371,044	12,182,009	10,714,467	12,494,822	11,157,763	9,941,491	156,556,793
SUPER 3	23,240,198	22,276,615	20,803,474	18,215,989	15,171,465	11,971,176	8,853,891	6,826,049	6,089,766	5,369,122	138,817,743
PROPO	37,752,743	37,215,944	31,935,412	26,521,827	17,850,499	12,908,804	9,283,910	7,321,629	4,658,090	3,143,096	188,591,954
EXTRA 5	7,568,405	5,915,738	5,797,479	4,877,160	3,828,010	4,783,312	3,760,888	2,280,836	2,342,320	2,243,946	43,398,092
GO LUCKY	-	-	-	-	-	5,266,610	1,528,674	547,728	313,888	-	7,656,900
PROPOGOAL	874,170	983,296	779,292	663,572	416,330	620,631	686,452	577,947	258,459	321,392	6,181,542
TOTAL	1,520,694,215	1,553,841,413	1,782,903,895	1,703,058,158	1,579,930,217	1,346,008,711	1,231,958,376	1,149,085,110	1,199,596,071	1,168,066,082	14,235,142,248

PERCENTAGE CHANGE IN THE GROSS GAMING REVENUE OF OPAP S.A. 2006-2015											
GAMES	2007/2006	2008/2007	2009/2008	2010/2009	2011/2010	2012/2011	2013/2012	2014/2013	2015/2014	2015/2008	2015/2006
KINO	31.1%	18.7%	1.2%	-9.4%	-15.9%	-3.1%	-6.0%	-0.8%	-0.2%	-30.5%	8.3%
PAME STOIXIMA	-17.9%	17.7%	-17.5%	-3.2%	-18.9%	-10.7%	-8.2%	10.5%	-8.3%	-46.3%	-48.1%
JOKER	3.4%	-4.6%	39.5%	-7.3%	-24.2%	-10.8%	-1.0%	30.3%	12.1%	26.4%	24.7%
MONITOR GAMES	-	-	-	-	-	-31.0%	-26.7%	-20.0%	-18.9%	-	-67.2% ¹⁷
LOTTO	2.5%	1.6%	9.1%	10.2%	-7.8%	-17.6%	9.5%	-17.2%	-12.4%	-27.5%	-24.6%
PROTO	4.2%	0.5%	-1.5%	-16.1%	-29.9%	-12.0%	16.6%	-10.7%	-10.9%	-52.7%	-50.5%
SUPER 3	-4.1%	-6.6%	-12.4%	-16.7%	-21.1%	-26.0%	-22.9%	-10.8%	-11.8%	-74.2%	-76.9%
PROPO	-1.4%	-14.2%	-17.0%	-32.7%	-27.7%	-28.1%	-21.1%	-36.4%	-32.5%	-90.2%	-91.7%
EXTRA 5	-21.8%	-2.0%	-15.9%	-21.5%	25.0%	-21.4%	-39.4%	2.7%	-4.2%	-61.3%	-70.4%
GO LUCKY	-	-	-	-	-	-71.0%	-64.2%	-42.7%	-	-	-94.0% ¹⁸
PROPOGOAL	12.5%	-20.7%	-14.8%	-37.3%	49.1%	10.6%	-15.8%	-55.3%	24.3%	-58.8%	-63.2%
TOTAL	2.2%	14.7%	-4.5%	-7.2%	-14.8%	-8.5%	-6.7%	4.4%	-2.6%	-34.5%	-23.2%

17. Refers to the period 2011-2015

18. Refers to the period 2011-2013

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AN OVERVIEW OF THE GREEK GAMBLING MARKET

PERCENTAGE SHARE OF GROSS REVENUE FOR OPAP S.A. IN 2006-2015

GAMES	2007/2006	2008/2007	2009/2008	2010/2009	2011/2010	2012/2011	2013/2012	2014/2013	2015/2014	2015/2008	2015/2006
KINO	35.05%	44.98%	46.55%	49.32%	48.15%	47.55%	50.34%	50.73%	48.19%	49.40%	46.79%
PAME STOIXIMA	49.65%	39.89%	40.93%	35.35%	36.87%	35.08%	34.23%	33.68%	35.66%	33.57%	37.86%
JOKER	7.48%	7.57%	6.29%	9.19%	9.18%	8.18%	7.97%	8.46%	10.55%	12.14%	8.56%
MONITOR GAMES	0.00%	0.00%	0.00%	0.00%	0.00%	3.11%	2.35%	1.85%	1.41%	1.18%	0.86%
LOTTO	1.94%	1.95%	1.73%	1.97%	2.34%	2.53%	2.28%	2.68%	2.12%	1.91%	2.12%
PROTO	1.32%	1.35%	1.18%	1.22%	1.10%	0.91%	0.87%	1.09%	0.93%	0.85%	1.10%
SUPER 3	1.53%	1.43%	1.17%	1.07%	0.96%	0.89%	0.72%	0.59%	0.51%	0.46%	0.98%
PROPO	2.48%	2.40%	1.79%	1.56%	1.13%	0.96%	0.75%	0.64%	0.39%	0.27%	1.32%
EXTRA 5	0.50%	0.38%	0.33%	0.29%	0.24%	0.36%	0.31%	0.20%	0.20%	0.19%	0.30%
GO LUCKY	0.00%	0.00%	0.00%	0.00%	0.00%	0.39%	0.12%	0.05%	0.03%	0.00%	0.05%
PROPOGOAL	0.06%	0.06%	0.04%	0.04%	0.03%	0.05%	0.06%	0.05%	0.02%	0.03%	0.04%
TOTAL	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

2.3.2 CASINO ENTERPRISES

In Greece nine (9) out of the ten (10) licensed casino enterprises were operative and allowed to operate games of chance in 2015¹⁹.

The nine (9) casino enterprises are listed below in alphabetical order:



19. in accordance with the provisions of Law 2206/1994 (GG series A, No. 62)

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

Casinos are exempted from the applicable laws on trading hours and are allowed to operate throughout the year and freely determine their opening hours, which they notify to the HGC.

The games played in the casinos are:

CASINO GAMES

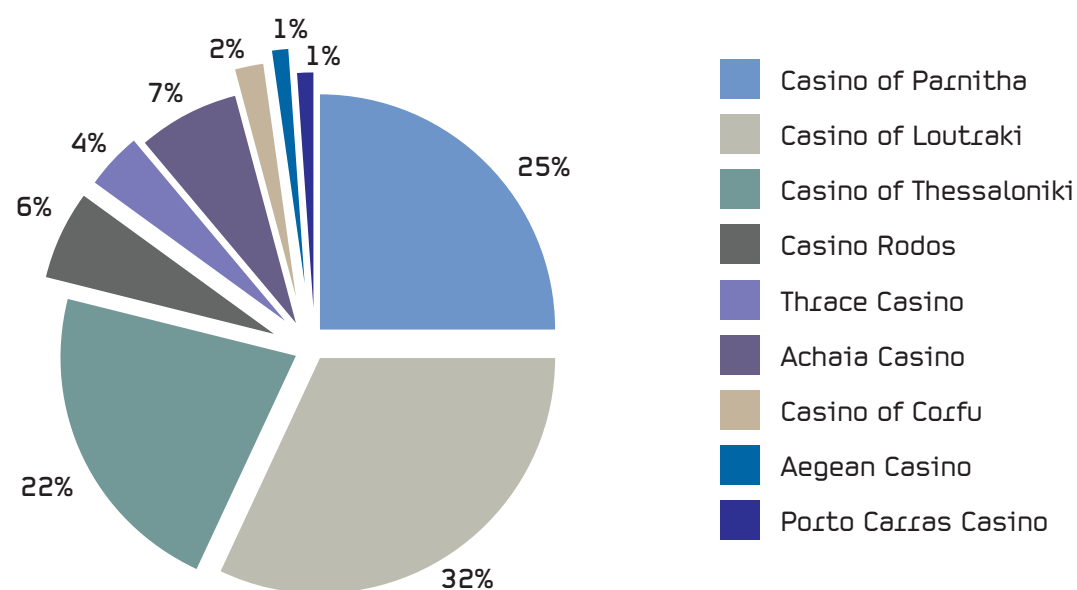
- Black Jack or «21».
- American Roulette and French Roulette.
- Banco - Punto.
- Baccarat - Chemin de fer.
- American craps.
- Greek craps.
- Poker (Poker and several variations of Poker: Casino Stud Poker, 5 Card Stud, 7 Card Stud, Omaha, Texas Hold'em or Hold'em).
- Electronic games of chance on slot machines.
- Electronic Roulette.
- Any other game for which a license has been issued.

The casino enterprises employed three thousand seven hundred and seventy-nine (3.779) people in total in December 2015, as opposed to three thousand eight hundred and eighty-eight (3.888) employees in December 2014. The number of employees has fallen by one hundred and nine (109) people on a year-on-year basis.

The following chart shows the distribution of employees in casino enterprises in December 2015:

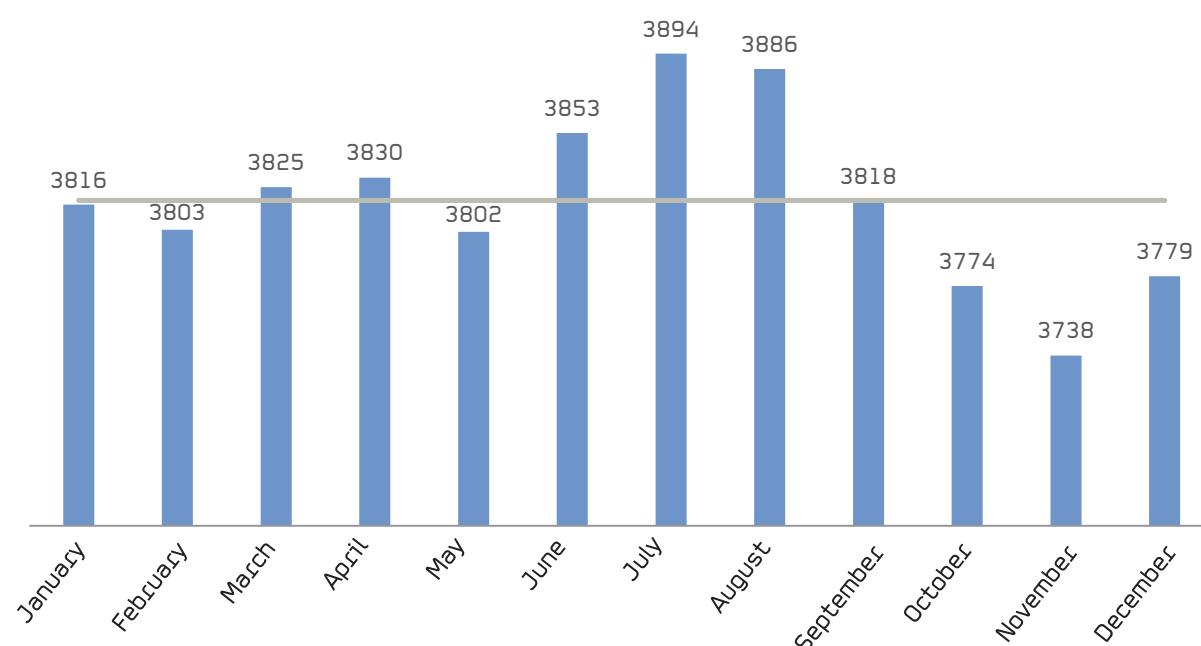
2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

Distribution of employees in casino enterprises



The following chart shows the monthly fluctuations in employment for the total of casino enterprises.

Monthly fluctuations in employment in casinos 2015



The number of employees goes up in the summer months in order to cover the increased demand from tourism.

As far as gaming equipment is concerned, the nine (9) casino enterprises have a license to install up to six thousand four hundred and forty-six (6,446) pieces of gambling equipment in total²⁰: five hundred and fifty-seven (557) tables and five thousand eight hundred and eighty nine (5,889) machines. In December 2015, three hundred and eighty (380) tables and three thousand five hundred and eighty-four (3,584) gambling machines, i.e. a total of three thousand nine hundred and sixty-four (3,964) pieces of gambling equipment had been installed and operating²¹. The games played on gambling tables are: American roulette and French roulette, baccarat and chemin de fer and some variations thereof, black jack, poker and some variations thereof, banco-punto and some variations thereof and craps, while the gambling machines include electronic roulettes, electronic roulette terminals and stand-alone slot machines.

	LICENSED GAMING EQUIPMENT DECEMBER 2015	GAMING EQUIPMENT IN USE DECEMBER 2014 (items)	GAMING EQUIPMENT IN USE DECEMBER 2015 (items)	% CHANGE DECEMBER 2015 DECEMBER 2014
Tables	557	394	380	-3.55%
Electronic roulettes	41	14	17	21.43%
Electronic roulette terminals	377	165	162	-1.82%
Slot machines	5,471	3,347	3,405	1.73%
GRAND TOTAL	6,446	3,920	3,964	1.12%

Compared to the year before (December 2014) a slight increase by 1.12% (44 items) in the total gambling equipment in operation was reported for the nine casinos. Specifically, stand-alone slot machines and electronic roulettes went up by 1.73% and 21.43% respectively, whereas the number of tables and electronic roulette terminals went up by 3.55% and 1.82% respectively.

The table below provides a detailed picture of the installed gaming capacity per casino as at December 2014 and 2015.

20. In accordance with the relevant operating license, as amended and in force.

21. In accordance with the latest approval decisions of the HGC for the restructuring of casino premises.

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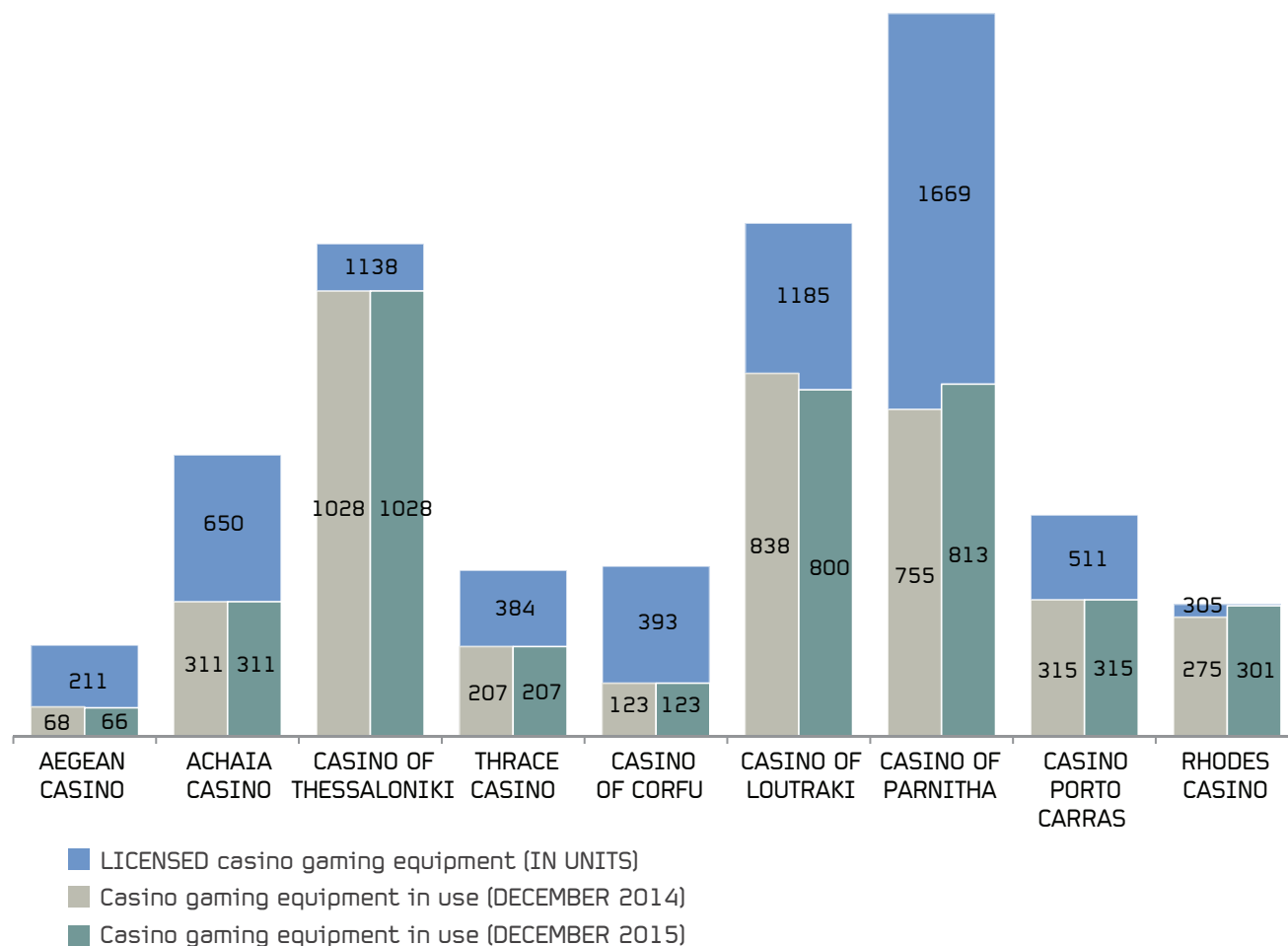
AN OVERVIEW OF THE GREEK GAMBLING MARKET

CASINO/ EQUIPMENT	LICENSED GAMING EQUIPMENT DECEMBER 2015 (items)	GAMING EQUIPMENT IN USE DECEMBER 2014 (items)	GAMING EQUIPMENT IN USE DECEMBER 2015 (items)	CHANGE IN GAMING EQUIPMENT IN USE 12/2015 -12/2014 (items)
AEGEAN CASINO	211	68	66	-2
Slot machines	185	53	53	0
Electronic roulettes	0	0	0	0
Electronic roulette terminals	0	0	0	0
Tables	26	15	13	-2
ACHAIA CASINO	650	311	311	0
Slot machines	550	263	263	0
Electronic roulettes	4	2	2	0
Electronic roulette terminals	56	16	16	0
Tables	40	30	30	0
CASINO OF THESSALONIKI	1138	1028	1028	0
Slot machines	941	897	897	0
Electronic roulettes	10	4	4	0
Electronic roulette terminals	84	27	27	0
Tables	103	100	100	0
THRACE CASINO	384	207	207	0
Slot machines	320	178	178	0
Electronic roulettes	3	1	1	0
Electronic roulette terminals	35	8	8	0
Tables	26	20	20	0
CASINO OF CORFU	393	123	123	0
Slot machines	300	90	90	0
Electronic roulettes	3	2	2	0
Electronic roulette terminals	56	16	16	0
Tables	34	15	15	0

CASINO/ EQUIPMENT	LICENSED GAMING EQUIPMENT DECEMBER 2015 (items)	GAMING EQUIPMENT IN USE DECEMBER 2014 (items)	GAMING EQUIPMENT IN USE DECEMBER 2015 (items)	CHANGE IN GAMING EQUIPMENT IN USE 12/2015 -12/2014 (items)
CASINO OF LOUTRAKI	1185	838	800	-38
Slot machines	1000	714	696	-18
Electronic roulettes	7	2	2	0
Electronic roulette terminals	86	40	35	-5
Tables	92	82	67	-15
PARNITHA CASINO	1669	755	813	58
Slot machines	1500	654	704	50
Electronic roulettes	12	2	5	3
Electronic roulette terminals	40	38	40	2
Tables	117	61	64	3
PORTO CARRAS CASINO	511	315	315	0
Slot machines	425	277	277	0
Electronic roulettes	1	0	0	0
Electronic roulette terminals	8	8	8	0
Tables	77	30	30	0
CASINO RODOS	305	275	301	26
Slot machines	250	221	247	26
Electronic roulettes	1	1	1	0
Electronic roulette terminals	12	12	12	0
Tables	42	41	41	0

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

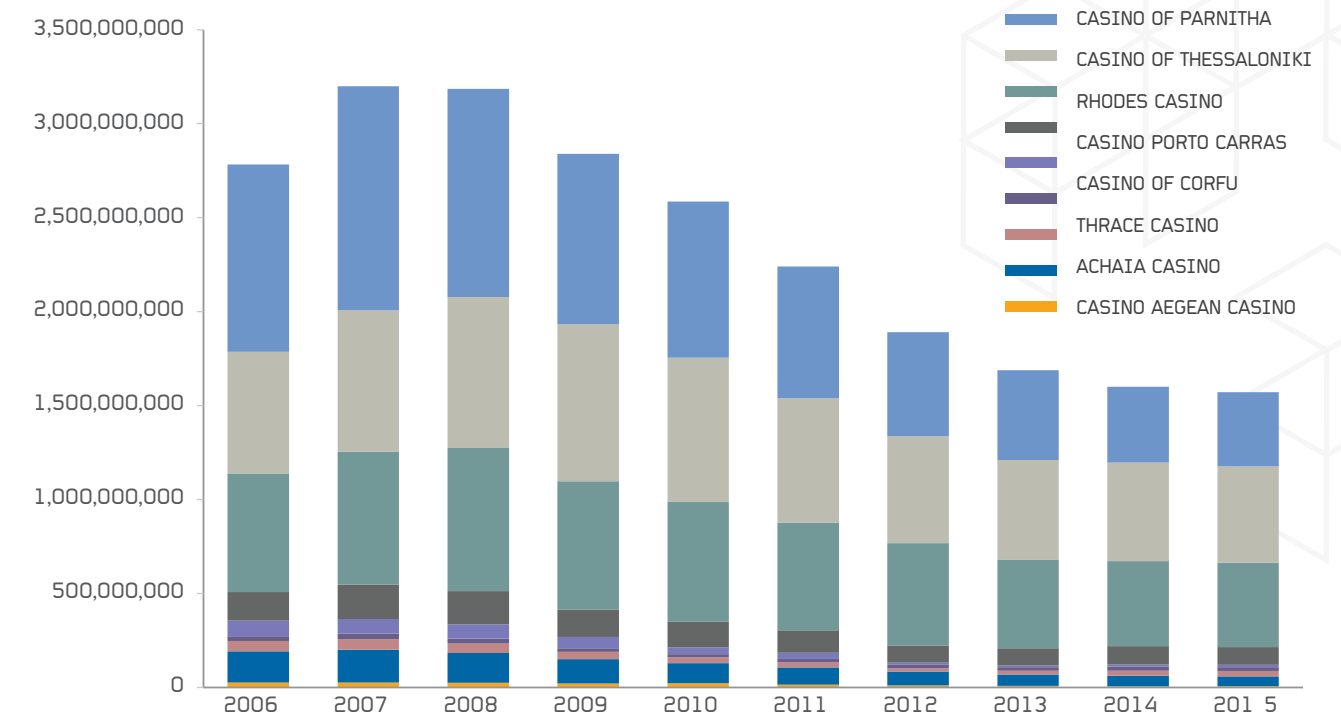
Casino gaming equipment



In 2015, all casino enterprises experienced a slight fall of 2% in their turnover (DROP) as compared to 2014, with only three (3) enterprises showing a positive rate of change. This increase was reported in the turnover of Porto Carras Casino (13%), Thrace Casino (10%) and Achaia Casino (7%).

In the period 2006-2016, casino enterprises as a whole saw their turnovers drop by 44% with four (4) out of the nine (9) casinos in operation showing a decrease above 50%. The most dramatic decrease, by 86%, was experienced by the Porto Carras Casino, followed by the Aegean Casino (74%), the Achaia Casino (69%) and, last but not least, the Casino of Loutraki (60%).

Casino enterprises turnover (2006-2015)



In the same period, all casino enterprises experienced a higher rate of decrease in their & i.e. gross revenue (WIN) than the one reported for the turnover of these enterprises, i.e. 61.5% for the entire ten-year period 2006-2015, ranging between 31% and 88% at the enterprise level.

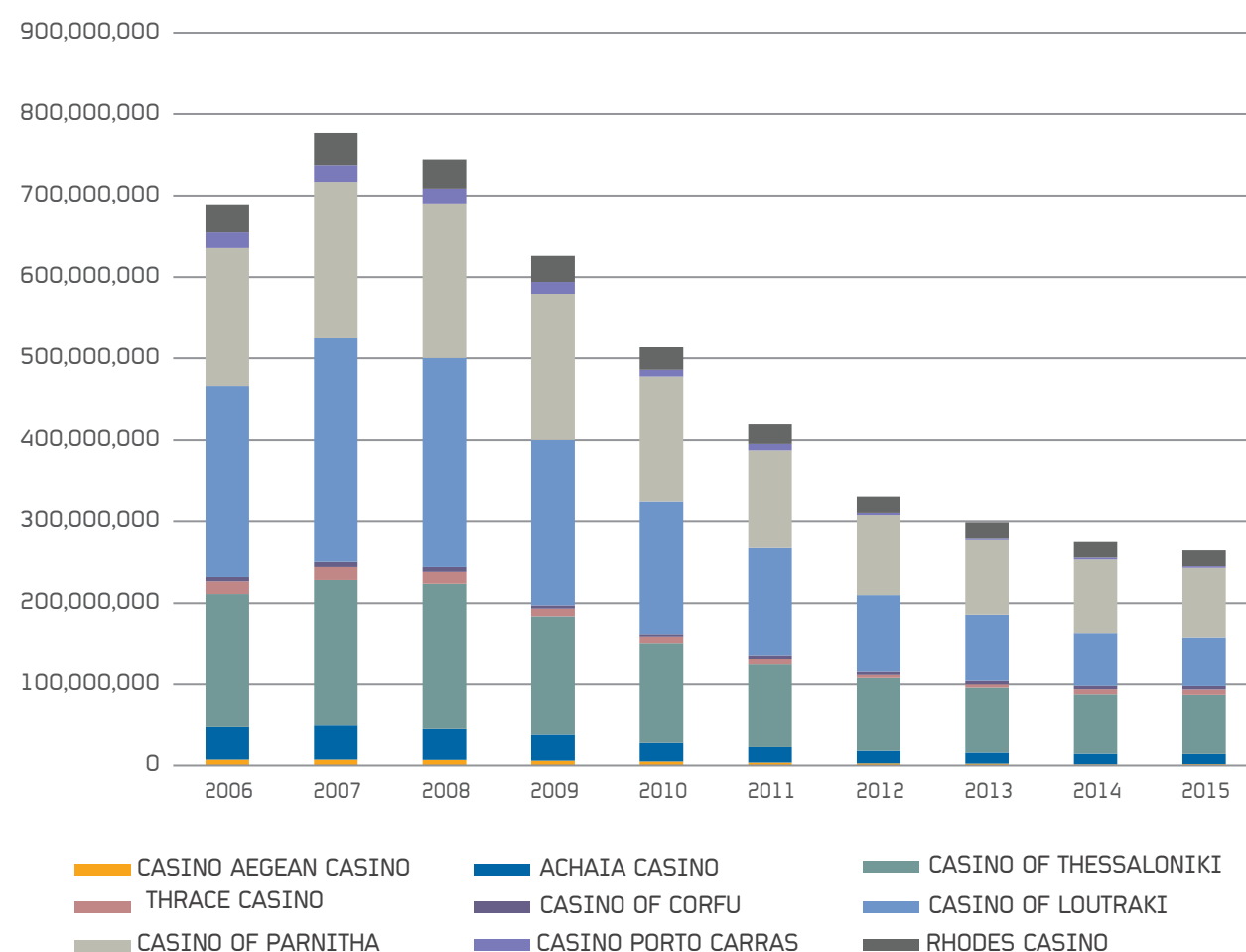
Evolution of the change in turnover & gross revenue of casinos



2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

The prolonged downturn in the economic activity of casinos that continues since 2008, the year when the gambling sector reported the best figures in the decade 2006-2015, is a matter of great concern, since it has to be seen whether this is exclusively due to the unfavorable economic environment or can be attributed to certain choices of the stakeholders in the casino sector that may have influenced its course. As a result, it has to be seen how we can ensure the sector's viability, retain jobs, and support local economic growth and the public interest as a whole.

Gross revenue of casino enterprises (2006-2015)



The following table presents the evolution of total gambling turnover (DROP) and of gross gaming revenue (WIN) per casino in the ten-year period 2006-2015, as well as the rate of change in the periods 2015/2014, 2015/2008 and 2015/2006, for the nine (9) casino enterprises.

TOTAL CASINO ENTERPRISES TURNOVER IN THE PERIOD 2006-2015 (in euros)

NAME	2006	2007	2008	2009	2010	2011
AEGEAN CASINO	25,771,820	25,781,989	24,349,911	20,266,951	22,538,607	15,094,630
ACHAIA CASINO	166,159,941	174,344,730	158,174,022	129,817,755	106,925,825	91,375,620
CASINO OF THESSALONIKI	631,055,663	707,471,406	761,879,013	682,891,434	638,202,573	571,449,874
THRACE CASINO	55,397,562	55,854,204	50,277,422	38,940,889	30,452,799	25,980,280
CASINO OF CORFU	25,415,371	30,200,683	27,079,443	18,947,299	16,649,538	19,217,320
CASINO OF LOUTRAKI	996,723,770	1,192,082,068	1,106,748,957	906,550,183	830,883,937	700,793,105
CASINO OF PARNITHA	648,171,936	752,842,294	804,338,221	835,626,619	768,324,122	663,039,005
PORTO CARRAS CASINO	82,752,265	78,195,258	75,810,663	60,279,445	36,697,077	32,969,781
CASINO RODOS	151,502,829	182,603,424	176,220,321	146,267,254	135,262,078	119,543,086
TOTAL	2,782,951,157	3,199,376,056	3,184,877,971	2,839,587,829	2,585,936,555	2,239,462,700

NAME	2012	2013	2014	2015	2015/2014	2015/2008	2015/2006
AEGEAN CASINO	11,030,985	8,595,255	6,135,230	6,593,255	7%	-73%	-74%
ACHAIA CASINO	71,129,955	60,081,785	56,669,490	52,069,620	-8%	-67%	-69%
CASINO OF THESSALONIKI	544,247,474	470,388,832	452,258,885	448,841,866	-1%	-41%	-29%
THRACE CASINO	18,538,301	19,563,565	26,222,538	28,872,550	10%	-43%	-48%
CASINO OF CORFU	19,210,020	19,962,485	21,569,065	20,477,700	-5%	-24%	-19%
CASINO OF LOUTRAKI	553,569,747	478,045,445	403,600,422	394,508,040	-2%	-64%	-60%
CASINO OF PARNITHA	568,525,966	531,390,828	524,806,706	513,915,909	-2%	-36%	-21%
PORTO CARRAS CASINO	11,827,095	8,000,579	10,287,501	11,604,767	13%	-85%	-86%
CASINO RODOS	92,076,514	91,669,622	98,393,218	94,518,874	-4%	-46%	-38%
TOTAL	1,890,156,056	1,687,698,396	1,599,943,054	1,571,402,581	-2%	-51%	-44%

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

GROSS REVENUE OF CASINO ENTERPRISES IN THE PERIOD 2006-2015 (in euros)

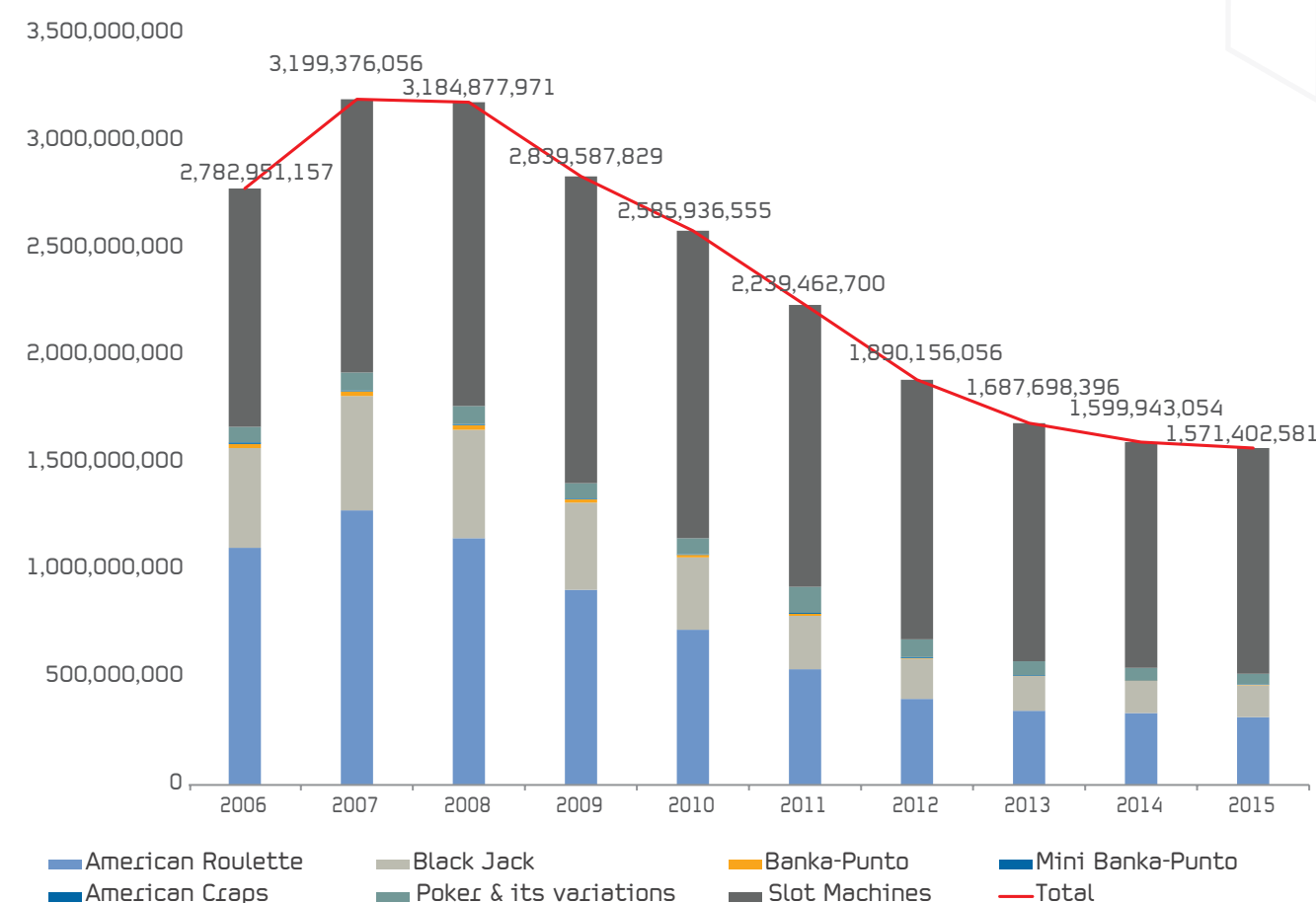
NAME	2006	2007	2008	2009	2010	2011
AEGEAN CASINO	7,280,564	7,268,476	6,825,620	5,942,176	4,947,907	3,693,152
ACHAIA CASINO	40,865,726	42,876,562	39,001,923	32,884,990	24,161,650	20,031,036
CASINO OF THESSALONIKI	163,217,923	178,211,015	177,998,734	143,931,393	121,036,475	100,948,680
THRACE CASINO	15,480,676	16,056,688	14,513,815	10,749,331	7,950,272	6,329,633
CASINO OF CORFU	5,381,263	6,102,955	6,077,538	3,801,858	3,067,213	4,083,165
CASINO OF LOUTRAKI	233,696,251	275,312,170	256,067,644	203,284,682	162,806,667	132,777,710
CASINO OF PARNITHA	169,680,680	191,024,217	190,113,634	178,735,371	153,530,629	119,791,586
PORTO CARRAS CASINO	19,180,795	20,623,527	18,162,684	14,805,137	8,466,302	7,833,881
CASINO RODOS	33,326,074	39,269,042	35,739,648	31,939,166	27,467,862	24,231,593
TOTAL	688,109,951	776,744,651	744,501,239	626,074,105	513,434,978	419,720,435

NAME	2012	2013	2014	2015	2015/2014	2015/2008	2015/2006
AEGEAN CASINO	2,426,453	2,089,691	1,368,854	1,438,801	5.1%	-79%	-80%
ACHAIA CASINO	15,562,690	13,607,281	13,234,598	12,720,347	-3.9%	-67%	-69%
CASINO OF THESSALONIKI	89,940,353	80,337,700	73,335,991	73,109,016	-0.3%	-59%	-55%
THRACE CASINO	3,815,890	4,063,833	6,220,079	6,686,360	7.5%	-54%	-57%
CASINO OF CORFU	3,946,782	4,400,106	4,279,386	4,199,809	-1.9%	-31%	-22%
CASINO OF LOUTRAKI	94,362,377	80,355,087	63,892,385	58,808,627	-8.0%	-77%	-75%
CASINO OF PARNITHA	97,427,876	92,654,783	91,277,420	86,262,895	-5.5%	-55%	-49%
PORTO CARRAS CASINO	2,706,814	1,596,191	2,222,167	2,180,454	-1.9%	-88%	-89%
CASINO RODOS	19,979,759	19,560,334	19,442,409	19,534,536	0.5%	-45%	-41%
TOTAL	330,168,995	298,665,006	275,273,290	264,940,845	-3.8%	-64%	-61%

As regards casino games in 2015, poker and its variations and banco-punto and its variations saw a fall by 14.53% and 17.41% respectively as opposed to the previous year. A slight decrease was also seen in black jack (0.67%, while the turnover of slot machines²² remained stable. Mini banco punto is the only game that reported a small positive change.

In the period 2006-2015, the most marked change was seen in the game banco-punto with a decrease in the turnover by 90.52%. However, this game accounts only for 0.45% of casino turnover in that period. Major losses were also reported for american roulette (71.42%) and black jack (67.87%). The smallest negative change for the whole decade was found in the electronic games of chance played on slot machines.

Evolution of casino games turnover (2006-2015)



22. Slot machines include the electronic roulette terminals.

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

The gross gaming revenue of casinos follows the downward slide of turnover at a relatively higher rate. However, the greatest differentiation is seen in gaming machines, which experienced only a small drop of 5.27% in their turnover, but the drop in their gross revenue was 51.5%.

CASINO GAMING TURNOVER IN THE PERIOD 2006-2015

GAMES	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	TOTAL
AMERICAN ROULETTE	1,106,796,718	1,281,170,909	1,150,957,957	910,501,433	724,526,032	539,897,020	401,379,300	345,793,455	334,998,115	316,355,000	7,112,375,938
BLACK JACK	465,389,945	533,193,360	506,104,688	406,714,365	337,029,630	249,569,520	187,199,615	162,230,740	150,559,785	149,546,820	3,147,538,467
BANCO-PUNTO	19,149,156	21,084,420	21,496,825	15,302,690	12,157,215	9,440,535	2,245,160	690,355	2,198,415	1,815,780	105,580,551
MINI BANCO-PUNTO	3,695,105	1,669,885	1,529,520	1,362,800	1,770,890	-	3,773,470	3,201,090	2,076,315	2,130,230	21,209,305
AMERICAN CRAPS	3,502,935	3,814,620	3,431,435	2,541,180	1,413,090	4,249,170	1,555,655	-	-	-	20,508,085
POKER AND ITS VARIATIONS	72,811,885	83,316,935	84,450,852	71,715,230	74,336,545	121,417,462	83,569,955	65,781,551	56,788,491	48,536,575	762,725,480
SLOT MACHINES	1,111,605,413	1,275,125,927	1,416,906,695	1,431,450,131	1,434,703,153	1,314,888,993	1,210,432,901	1,110,001,206	1,053,321,934	1,053,018,176	12,411,454,529
TOTAL	2,782,951,157	3,199,376,056	3,184,877,971	2,839,587,829	2,585,936,555	2,239,462,700	1,890,156,056	1,687,698,396	1,599,943,054	1,571,402,581	23,581,392,355

PERCENTAGE CHANGE IN CASINO GAMING TURNOVER. YEARLY

GAMES	2007/2006	2008/2007	2009/2008	2010/2009	2011/2010	2012/2011	2013/2012	2014/2013	2015/2014	2015/2008	2015/2006
AMERICAN ROULETTE	15.75%	-10.16%	-20.89%	-20.43%	-25.48%	-25.66%	-13.85%	-3.12%	-5.57%	-72.51%	-71.42%
BLACK JACK	14.57%	-5.08%	-19.64%	-17.13%	-25.95%	-24.99%	-13.34%	-7.19%	-0.67%	-70.45%	-67.87%
BANCO-PUNTO	10.11%	1.96%	-28.81%	-20.56%	-22.35%	-76.22%	-69.25%	218.45%	-17.41%	-91.55%	-90.52%
MINI BANCO-PUNTO	-54.81%	-8.41%	-10.90%	29.94%	-100%	-	-15.17%	-35.14%	2.60%	39.27%	-42.35%
AMERICAN CRAPS	8.90%	-10.05%	-25.94%	-44.39%	200.70%	-63.39%	-	-	-	-54.66% ²³	21.30% ²⁴
POKER AND ITS VARIATIONS	14.43%	1.36%	-15.08%	3.66%	63.33%	-31.17%	-21.29%	-13.67%	-14.53%	-42.53%	-33.34%
SLOT MACHINES	14.71%	11.12%	1.03%	0.23%	-8.35%	-7.94%	-8.30%	-5.11%	-0.03%	-25.68%	-5.27%
TOTAL	14.96%	-0.45%	-10.84%	-8.93%	-13.40%	-15.60%	-10.71%	-5.20%	-1.78%	-50.66%	-43.53%

23. Refers to the period 2008-2012

24. Refers to the period 2006-2012

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

GROSS GAMING REVENUE OF CASINO ENTERPRISES IN THE PERIOD 2006-2015 (in euros)

GAMES	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	TOTAL
AMERICAN ROULETTE	215,693,936	239,180,827	209,611,497	170,458,301	134,188,424	99,281,434	70,005,503	64,508,910	59,148,157	55,164,640	1,317,241,629
BLACK JACK	98,959,095	110,299,056	106,722,215	86,735,221	69,783,890	53,235,047	38,281,947	34,847,197	31,803,562	29,985,528	660,652,757
BANCO-PUNTO	2,834,832	2,898,678	2,372,036	1,860,075	1,189,797	978,026	272,725	129,472	333,987	324,728	13,194,355
MINI BANCO-PUNTO	359,109	204,703	347,636	218,702	426,319	-	656,956	717,270	361,610	437,448	3,729,751
AMERICAN CRAPS	585,044	693,537	806,535	524,337	148,573	521,080	196,047	-	-	-	3,475,151
POKER AND ITS VARIATIONS	19,901,988	23,631,792	26,071,622	21,662,065	18,808,525	23,017,549	17,508,928	13,593,937	11,544,128	9,489,780	185,230,312
SLOT MACHINES	349,775,948	399,836,061	398,569,698	344,615,404	288,889,451	242,687,299	203,246,890	184,868,220	172,081,847	169,538,722	2,754,109,540
TOTAL	688,109,951	776,744,651	744,501,239	626,074,105	513,434,978	419,720,435	330,168,995	298,665,006	275,273,290	264,940,845	4,937,633,493

PERCENTAGE CHANGE IN THE GROSS GAMING REVENUE OF CASINO ENTERPRISES. YEARLY

GAMES	2007/2006	2008/2007	2009/2008	2010/2009	2011/2010	2012/2011	2013/2012	2014/2013	2015/2014	2015/2008	2015/2006
AMERICAN ROULETTE	10.9%	-12.4%	-18.7%	-21.3%	-26.0%	-29.5%	-7.9%	-8.3%	-6.7%	-73.7%	-74.4%
BLACK JACK	11.5%	-3.2%	-18.7%	-19.5%	-23.7%	-28.1%	-9.0%	-8.7%	-5.7%	-71.9%	-69.7%
BANCO-PUNTO	2.3%	-18.2%	-21.6%	-36.0%	-17.8%	-72.1%	-52.5%	158.0%	-2.8%	-86.3%	-88.5%
MINI BANCO-PUNTO	-43.0%	69.8%	-37.1%	94.9%	-100.0%	-	9.2%	-49.6%	21.0%	25.8%	21.8%
AMERICAN CRAPS	18.5%	16.3%	-35.0%	-71.7%	250.7%	-62.4%	-	-	-	-75.7% ²⁵	-66.5% ²⁶
POKER AND ITS VARIATIONS	18.7%	10.3%	-16.9%	-13.2%	22.4%	-23.9%	-22.4%	-15.1%	-17.8%	-63.6%	-52.3%
SLOT MACHINES	14.3%	-0.3%	-13.5%	-16.2%	-16.0%	-16.3%	-9.0%	-6.9%	-1.5%	-57.5%	-51.5%
TOTAL	12.9%	-4.2%	-15.9%	-18.0%	-18.3%	-21.3%	-9.5%	-7.8%	-3.8%	-64.4%	-61.5%

25. Refers to the period 2008-2012

26. Refers to the period 2006-2012

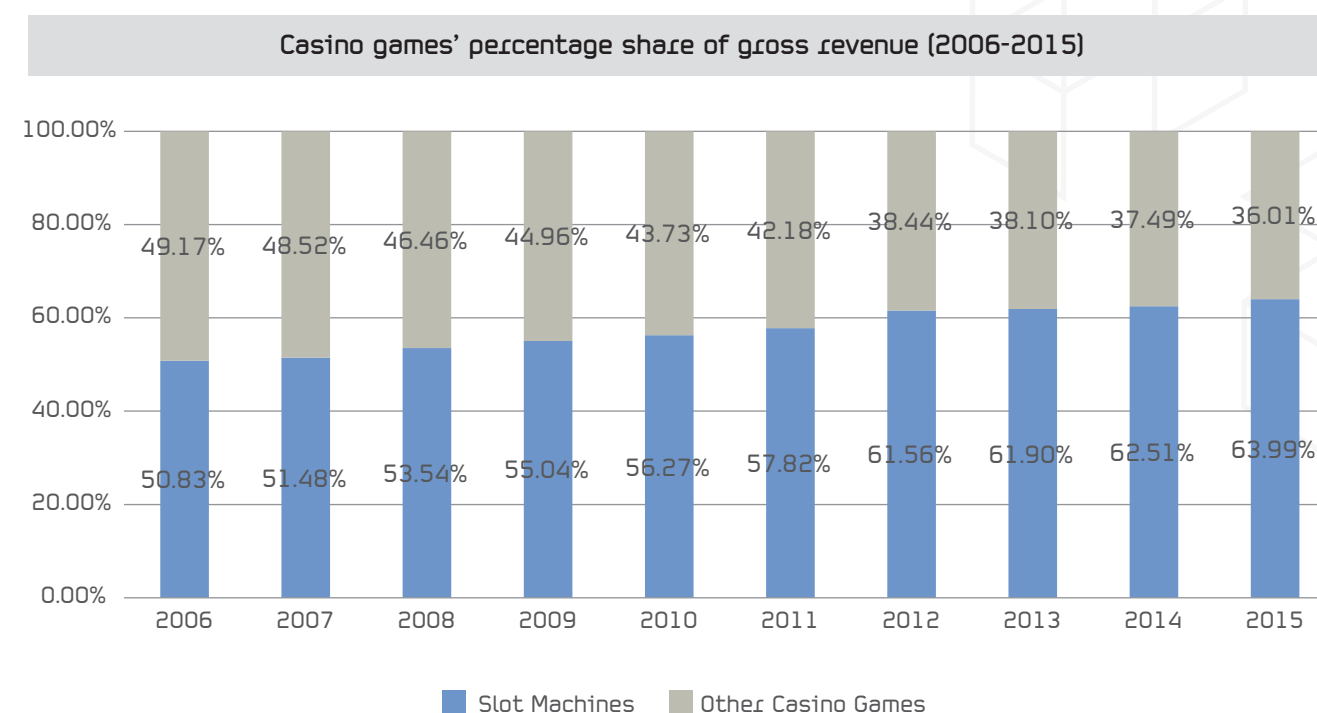
2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

Nevertheless, gaming machines are the most popular casino game, followed by american roulette and black-jack. Over a period of ten years, 2006-2015, they maintained a 96% share of casino gambling turnover with slot machines having shown an increase throughout the period.

CASINO GAMES' PERCENTAGE SHARE OF TOTAL GAMBLING TURNOVER IN 2006-2015											
GAMES	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	TOTAL
AMERICAN ROULETTE	39.77%	40.04%	36.14%	32.06%	28.02%	24.11%	21.24%	20.49%	20.94%	20.13%	30.16%
BLACK JACK	16.72%	16.67%	15.89%	14.32%	13.03%	11.14%	9.90%	9.61%	9.41%	9.52%	13.35%
BANCO-PUNTO	0.69%	0.66%	0.67%	0.54%	0.47%	0.42%	0.12%	0.04%	0.14%	0.12%	0.45%
MINI BANCO-PUNTO	0.13%	0.05%	0.05%	0.05%	0.07%	-	0.20%	0.19%	0.13%	0.14%	0.09%
AMERICAN CRAPS	0.13%	0.12%	0.11%	0.09%	0.05%	0.19%	0.08%	-	-	-	0.09%
POKER AND ITS VARIATIONS	2.62%	2.60%	2.65%	2.53%	2.87%	5.42%	4.42%	3.90%	3.55%	3.09%	3.23%
SLOT MACHINES	39.94%	39.86%	44.49%	50.41%	55.48%	58.71%	64.04%	65.77%	65.83%	67.01%	52.63%
TOTAL	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

CASINO GAMES' PERCENTAGE SHARE OF GROSS REVENUE IN 2006-2015											
GAMES	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	TOTAL
AMERICAN ROULETTE	31.35%	30.79%	28.15%	27.23%	26.14%	23.65%	21.20%	21.60%	21.49%	20.82%	26.68%
BLACK JACK	14.38%	14.20%	14.33%	13.85%	13.59%	12.68%	11.59%	11.67%	11.55%	11.32%	13.38%
BANCO-PUNTO	0.41%	0.37%	0.32%	0.30%	0.23%	0.23%	0.08%	0.04%	0.12%	0.12%	0.27%
MINI BANCO-PUNTO	0.05%	0.03%	0.05%	0.03%	0.08%	-	0.20%	0.24%	0.13%	0.17%	0.08%
AMERICAN CRAPS	0.09%	0.09%	0.11%	0.08%	0.03%	0.12%	0.06%	-	-	-	0.07%
POKER AND ITS VARIATIONS	2.89%	3.04%	3.50%	3.46%	3.66%	5.48%	5.30%	4.55%	4.19%	3.58%	3.75%
SLOT MACHINES	50.83%	51.48%	53.54%	55.04%	56.27%	57.82%	61.56%	61.90%	62.51%	63.99%	55.78%
TOTAL	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

The contribution of slot machines to gross revenue followed along the same upward line as their contribution to turnover throughout the period 2006-2015, thus resulting to 63.99% in 2015, as analyzed in the following chart. Slot machines contributed by 52.63% to turnover and 55.78% to gross revenue in this period.

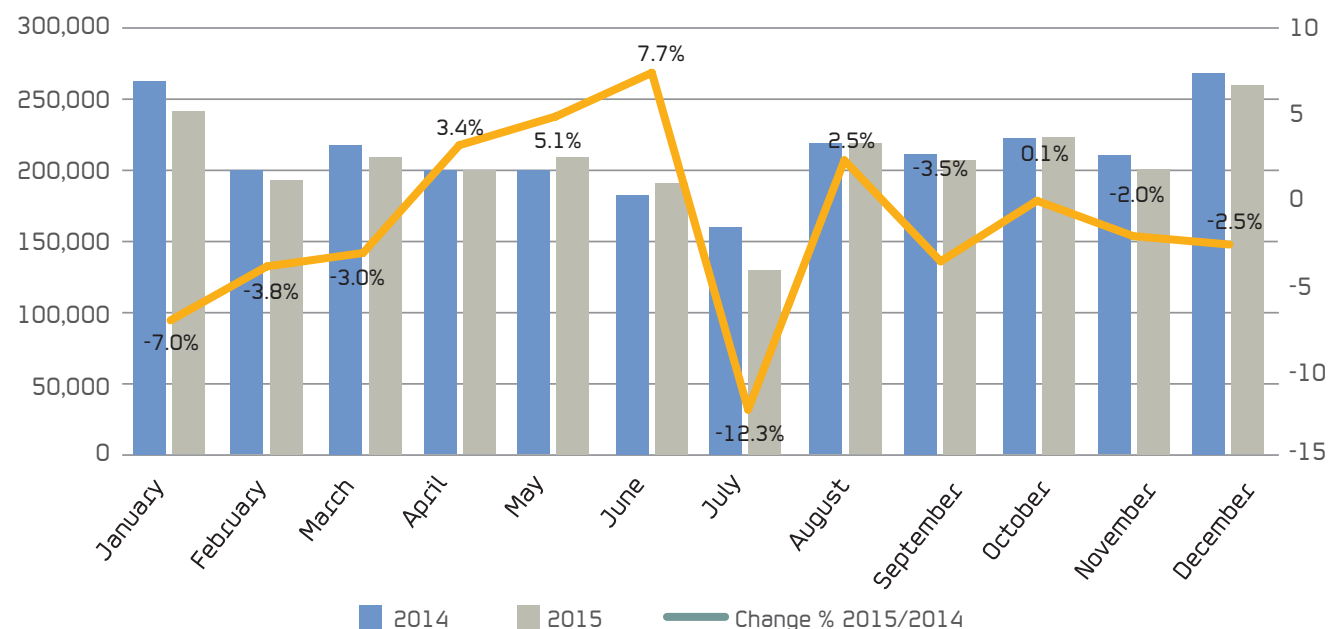


As regards the number of visits to casino enterprises, in 2015 it was slightly down (1.5%) as compared to 2014. In other words, the total number of tickets issued by casino enterprises in 2015 was 2,575,082²⁷, as opposed to 2,615,569 in 2014. The following chart shows the fluctuations in the number of visits, in the years 2014 and 2015, on the basis of tickets per month. It should be noted that the biggest fall in these two years was seen in July, when capital controls were imposed in Greece.

27. According to the Daily Bulletin on Inspection Findings of the HGC.

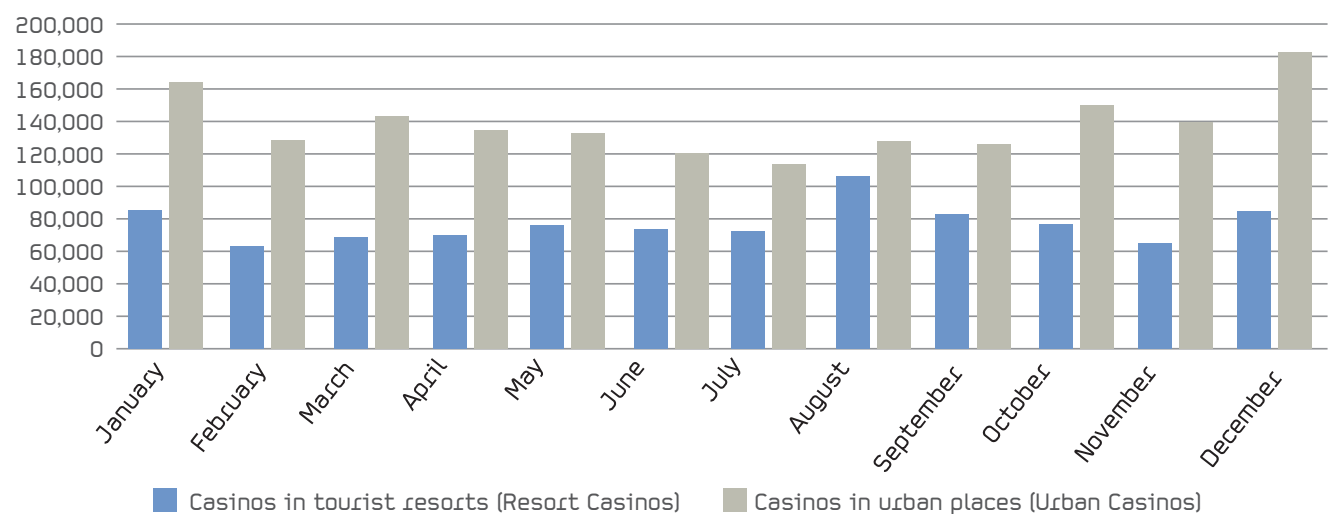
2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

Fluctuations in the number of visits to casinos, monthly (2014-2015)



In addition, if we divide casinos into two large categories, those operating in tourist areas and those located near large cities, we find out that the number of visits was increased in the summer months, in 2015, for the first category. By contrast, the number of visits to the casinos that are close to large cities mainly peaked in the winter months, as shown in the following chart.

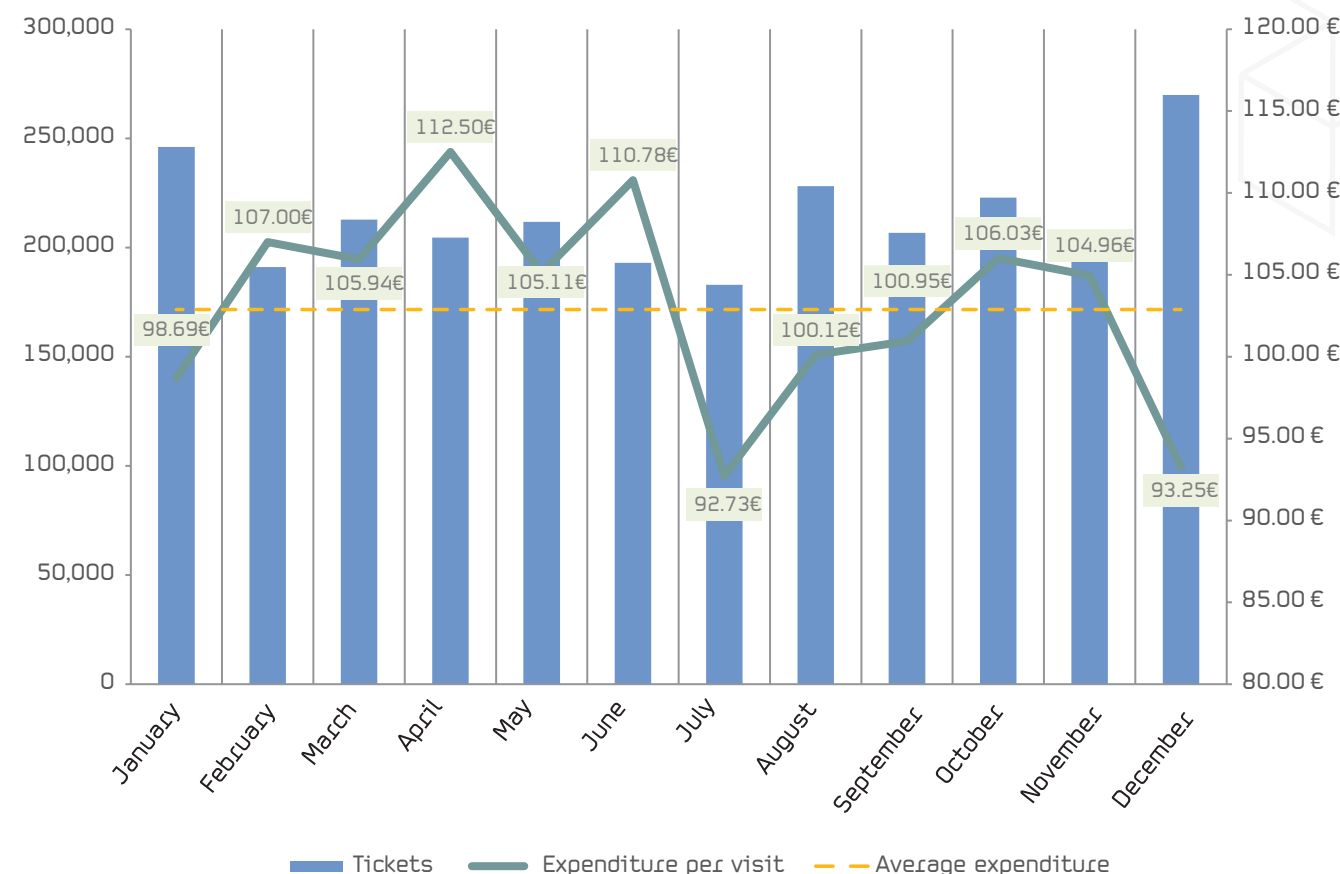
Fluctuations in the number of visits to casinos, per area (2015)



If we compare the fluctuations in the number of visits to casino enterprises with spending²⁸ per visit, we see that the number of visitors to casino enterprises peaked during the Christmas holidays, but spending per visit in this period is lower than the average annual spending of 102.89€ that was recorded in 2015.

The following table and chart show the number of tickets issued by casino enterprises and the amount of spending per visit, as well as the average annual spending per visit in 2015, on a monthly basis.

Visits vs spending, monthly (2015)



28. Spending is the amount of money lost by players and won by casino enterprises. It is equal to the gross gaming revenue (GGR or WIN) of casinos.

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

Month	Tickets per month	Spending per visit	Average annual spending (2015) 102.89€
JANUARY	246,047	€98.69	
FEBRUARY	191,105	€107.00	
MARCH	212,852	€105.94	
APRIL	204,556	€112.50	
MAY	211,811	€105.11	
JUNE	192,975	€110.78	
JULY	182,937	€92.73	
AUGUST	228,136	€100.12	
SEPTEMBER	206,743	€100.95	
OCTOBER	222,813	€106.03	
NOVEMBER	205,214	€104.96	
DECEMBER	269,893	€93.25	
TOTAL	2,575,082		

2.3.3 "HELENIC LOTTERIES S.A."

The Greek State has an exclusive right to operate the State Lotteries, which was being exercised through the Directorate of State Lotteries of the Ministry of Finance.

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

The concession agreement refers to the following State Lotteries:

- The Popular Lottery («Laiko»).
- The National Lottery («Ethniko»).
- The Special State Social Solidarity Lottery or New Year's Lottery («Protochroniatiko»).
- The Instant State Lottery.
- The European Lottery.
- The Housing State Lottery.

GAMES OF GREEK LOTTERIES S.A. (IN CIRCULATION)

POPULAR LOTTERY (LAIKO)
NATIONAL LOTTERY (ETTHNIKO)
SPECIAL STATE SOCIAL SOLIDARITY
LOTTERY (PROTOCHRONIATIKO)
INSTANT STATE LOTTERY (SCRATCH)

The Instant State Lottery circulated in the period 1993-2003 under the name «xysto» and has not been reissued ever since, while the last two lotteries did not circulate at all.

The concessionaire «Hellenic Lotteries S.A.» started operating the State Lotteries that existed already on 1st May 2014. The Instant State Lottery was relaunched on that same day under a new trade name, «SCRATCH», and became the best-selling State Lottery in 2014 and 2015.

The permanent staff of Hellenic Lotteries S.A. as at 31st December 2015 was 24 people²⁹.

In 2015, the turnover of Hellenic Lotteries S.A. was on the decline as compared to 2014, but still remained at higher levels than in 2013. More specifically, the total turnover of lotteries was 449,567,165 euros in 2015 and

479,574,260 euros in 2014 as opposed to 238,226,690 in 2013. In the period 2006-2015, State Lotteries are the only game whose turnover saw a positive change of 7.7% in terms of volume.

Although the evolution of the total turnover of state Lotteries has been positive these ten years, the figures per game are different. In particular, State Lotteries, excluding SCRATCH, which circulated in 2014, suffered significant losses, the heaviest being those of the Special State Social Solidarity Lottery («Protochroniatiko»), whose turnover decreased by 76.08% in the entire period 2006-2015.

The Special State Social Solidarity Lottery («Protochroniatiko») is the only game of chance whose provider just receives a management fee (for its production, operation, promotion, etc.), because net revenue is used by the Greek State for social policies.

This lottery is only issued once a year and the draw takes place on the last day of the year. In the same period, in 2015, we had the first special draw of the «Laiko» lottery game, which was a celebratory lottery, the Christmas «Laiko» lottery.

The following tables show the evolution of the State Lotteries' turnover, per lottery, in the period 2006-2015.

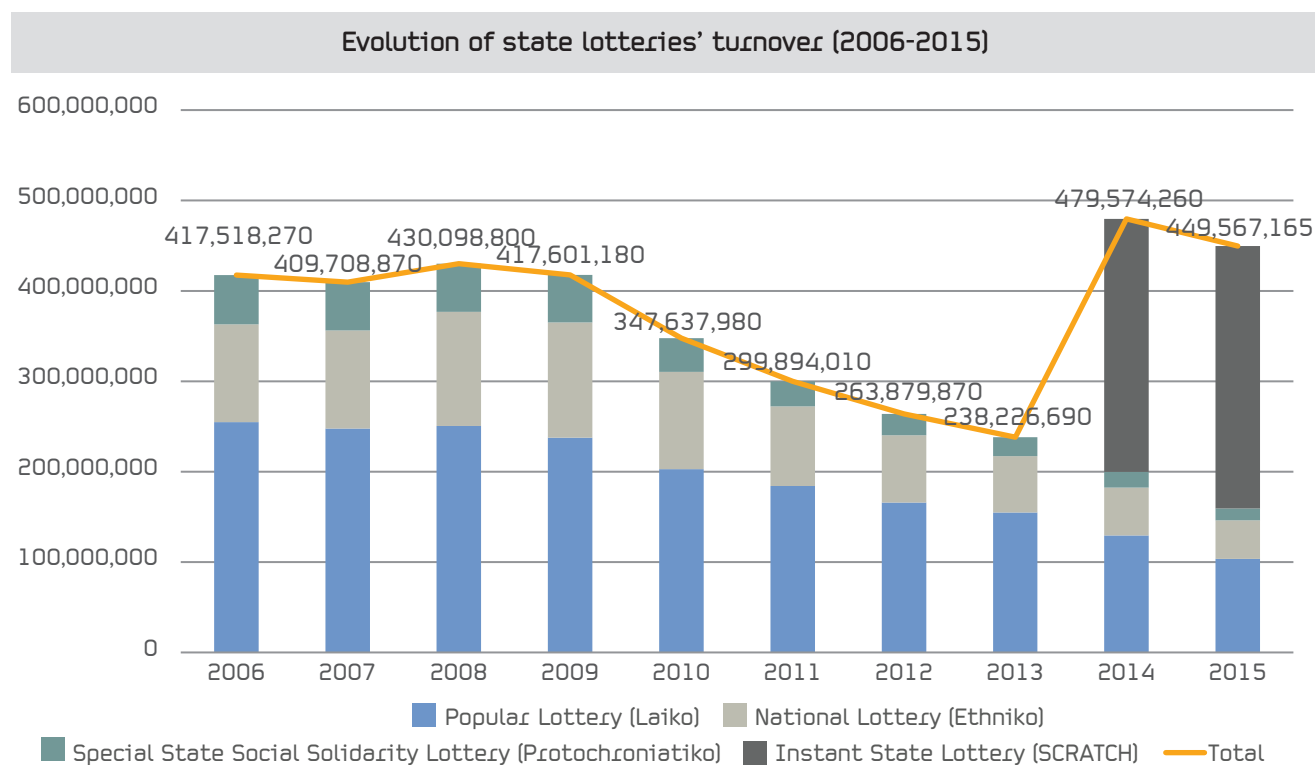
STATE LOTTERIES		
Έτος	Year, Turnover (in euros)	%
2006	417,518,270	-
2007	409,708,870	-1.9%
2008	430,098,800	5.0%
2009	417,601,180	-2.9%
2010	347,637,980	-16.8%
2011	299,894,010	-13.7%
2012	263,879,870	-12.0%
2013	238,226,690	-9.7%
2014	479,574,260	101.3%
2015	449,567,165	-6.3%

29. Source: Data provided to the HGC by Hellenic Lotteries S.A.

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

	"LAIKO"		"ETHNIKO"		"PROTOCHRONIATIKO"		"SCRATCH"	
Year	Turnover (in euros)	%	Turnover (in euros)	%	Turnover (in euros)	%	Turnover (in euros)	%
2006	254,838,270		108,180,000		54,500,000		-	-
2007	247,848,870	-2.7%	108,360,000	0.2%	53,500,000	-1.8%	-	-
2008	250,610,800	1.1%	126,140,000	16.4%	53,348,000	-0.3%	-	-
2009	237,555,500	-5.2%	127,513,680	1.1%	52,532,000	-1.5%	-	-
2010	202,867,100	-14.6%	107,522,880	-15.7%	37,248,000	-29.1%	-	-
2011	184,258,810	-9.2%	88,063,200	-18.1%	27,572,000	-26.0%	-	-
2012	165,981,910	-9.9%	74,307,960	-15.6%	23,590,000	-14.4%	-	-
2013	154,848,450	-6.7%	62,378,240	-16.1%	21,000,000	-11.0%	-	-
2014	129,495,340	-16.4%	52,912,720	-15.2%	17,357,100	-17.3%	279,809,100	-
2015	103,611,785	-20.0%	42,627,480	-19.4%	13,035,000	-24.9%	290,292,900	3.7%

Furthermore, in 2015, 14 new editions of SCRATCH were launched (10 new editions and 4 re-editions), while older editions are still on the market.



The «Laiko» lottery had the biggest market share (65.0%) of share until 2013, however with the introduction of SCRATCH the situation changed and the latter has been the most popular lottery game ever since. In particular, SCRATCH took up 64.57% of the market share of lotteries in 2015 as opposed to 58.35% in 2014, while «Laiko» remained in decline and came down to 23.05% in 2015.

STATE LOTTERIES' PERCENTAGE SHARE OF TOTAL GAMBLING TURNOVER 2006-2015					
Year	LAIKO	ETHNIKO	PROTOCHRONIATIKO	SCRATCH	TOTAL
2006	61.04%	25.91%	13.05%	-	100%
2007	60.49%	26.45%	13.06%	-	100%
2008	58.27%	29.33%	12.40%	-	100%
2009	56.89%	30.53%	12.58%	-	100%
2010	58.36%	30.93%	10.71%	-	100%
2011	61.44%	29.36%	9.19%	-	100%
2012	62.90%	28.16%	8.94%	-	100%
2013	65.00%	26.18%	8.82%	-	100%
2014	27.00%	11.03%	3.62%	58.35%	100%
2015	23.05%	9.48%	2.90%	64.57%	100%

In 2006 the «Ethniko» lottery game had a 25.91% share of state lotteries' turnover. Despite some small fluctuations, «Ethniko»'s share remained stable until the end of 2013. Subsequently, its share dropped to 11.03% and 9.48% in 2014 and 2015 respectively. «Ethniko» is a traditional lottery with special characteristics. The decline that was reported in recent years is probably an indication that the chances of recovery of its market share are rather slim, given that it is addressed to a very specific market.

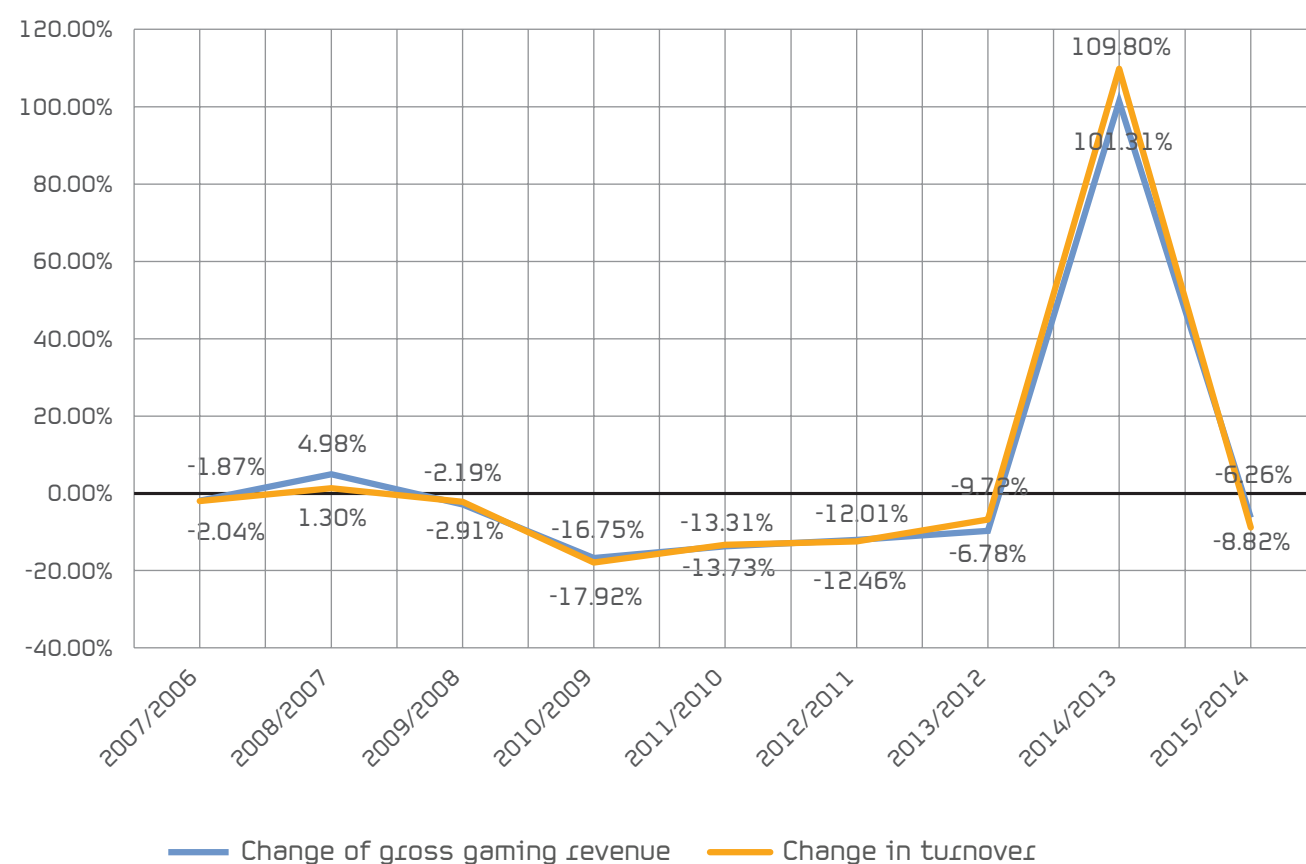
The Special State Social Solidarity Lottery («Protochroniatiko») maintained a share above 10% until the end of 2010. Since then its share of the total turnover has shrunk to single-digit percentages, getting to just 2.90% in 2015.

The gross revenue of state lotteries has not been very different from turnover in the period 2006-2015.

STATE LOTTERIES		
Year	Gross Revenue (in euros)	%
2006	161,283,459	-
2007	157,985,305	-2.0%
2008	160,035,658	1.3%
2009	156,536,028	-2.2%
2010	128,486,342	-17.9%
2011	111,384,762	-13.3%
2012	97,509,021	-12.5%
2013	90,898,837	-6.8%
2014	190,709,020	109.8%
2015	173,894,656	-8.8%

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

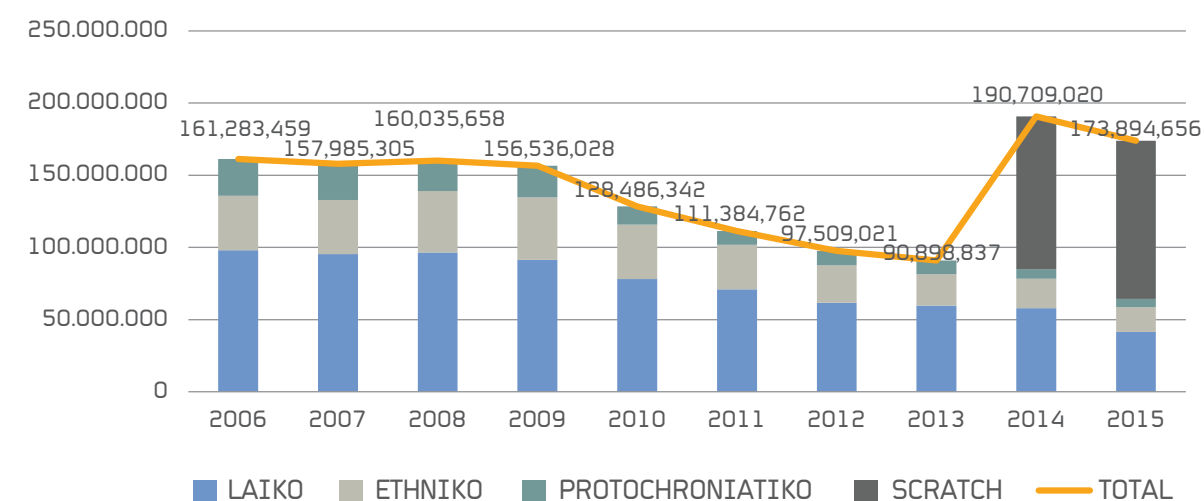
Evolution of the change in turnover & gross revenue of state lotteries



The negative change reported from 2006 onwards was reversed in 2014, the year when the biggest figure in a decade was recorded for gross revenue. In 2015, despite a decrease of 8.8% in gross revenue, gross revenue volume was the second highest over a period of ten years.

Year	LAIKO		ETHNIKO		PROTOCHRONIATIKO		SCRATCH	
	Gross Revenue (in euros)	%	Gross Revenue (in euros)	%	Gross Revenue (in euros)	%	Gross Revenue (in euros)	%
2006	98,112,734		37,560,000		25,610,725		-	-
2007	95,421,815	-2.7%	37,500,000	-0.2%	25,063,490	-2.1%	-	-
2008	96,485,158	1.1%	42,547,000	13.5%	21,003,500	-16.2%	-	-
2009	91,458,868	-5.2%	43,115,360	1.3%	21,961,800	4.6%	-	-
2010	78,103,834	-14.6%	37,633,008	-12.7%	12,749,500	-41.9%	-	-
2011	70,939,642	-9.2%	30,822,120	-18.1%	9,623,000	-24.5%	-	-
2012	61,671,035	-13.1%	26,007,786	-15.6%	9,830,200	2.2%	-	-
2013	59,616,653	-3.3%	21,832,384	-16.1%	9,449,800	-3.9%	-	-
2014	57,858,260	-2.9%	20,473,700	-6.2%	6,530,770	-30.9%	105,846,290	-
2015	41,402,961	-28.4%	17,202,740	-16.0%	5,753,180	-11.9%	109,535,775	3.5%

Evolution of gross revenue of state lotteries (2006-2015)



2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

2.3.4 2.3.4 THE «HELLENIC HORSE RACING ORGANIZATION S.A.» (ODIE S.A.)

ODIE S.A. had the exclusive rights to organize and operate mutual betting on horse racing in Greece. ODIE S.A. started its activities in 1968, by virtue of Emergency Law 598/1968 (GG Series A, No. 256) «On the establishment of a horse racing organization and other similar provisions». Horse racing was taking place in the racecourse at the Faliron Delta. Mutual betting on horse racing used to be played in the racecourse premises or in the special horse racing betting agencies.

In 2003, ODIE S.A. was relocated to Markopoulo-Attica, where it is now based, in the new racecourse constructed for the 2004 Olympics. At that time it had a branch in Athens and was cooperating with the agencies of OPAP S.A. across the country.

Early 2013, the Greek State launched the procedure for the concession of its exclusive rights to operate mutual betting on horse racing and, on 23rd September 2014, the company under the name «OPAP Investments LTD», a subsidiary of OPAP S.A., was declared provisional successful bidder in the relevant tender.³⁰

On 24th April 2015, a concession agreement was concluded between the «Hellenic Republic Asset Development Fund S.A.» and «Hellas Horse Races S.A.» of the OPAP S.A. Group, which granted the latter the exclusive right to operate and manage mutual betting on horse races for a period of twenty years.

On 23rd October 2015, by virtue of Law 4338/2015 (GG Series A, No. 131), the Hellenic Parliament ratified the concession agreement with «Hellas Horse Races S.A.». On 9th November 2015, by virtue of Law 4342/2015 (GG Series A, No. 143), para. 5, article 51, the Hellenic Parliament ratified the last condition precedent of the concession agreement.

«Hellas Horse Races S.A.» was officially authorized to start operating horse races once all conditions had been fulfilled, on 10th December 2015, but the date was changed to early January of the following year after a representation by the Hellenic Republic Asset Development Fund S.A.

HORSE RACING CATEGORIES

- GREEK HORSE RACING
- FRENCH HORSE RACING
- SOUTH AFRICAN HORSE RACING

In 2015, ODIE S.A. provided the following horse racing categories:

- Greek Horse Racing,
- French Horse Racing and
- South African Horse Racing.

The permanent staff of ODIE S.A. in 2015 was 54 people³¹.

In 2015, which is the year when the concession of the exclusive right to organize and operate mutual betting on horse racing was still ongoing, the turnover showed a significant decline by 24.5% as opposed to 2014. It should be noted that during the entire period ODIE S.A. was not fully operative, as it was waiting for the completion of the concession.

From 2010 onwards the turnover of mutual betting on horse racing has been experiencing equally high rates of decline on an annual basis, and, as a result, the total decline for the entire ten-year period was 89.7%.

The only exception, i.e. a positive change, was in 2008, when turnover increased by 4.8% in comparison to the previous year.

As regards the turnover of ODIE S.A., per race day³², the figures presented refer to the period 2010-2015. It should be noted that the most marked fall was seen in betting on Greek horse racing and was 94.2%, while a significant drop was also reported in the equivalent bets on South African horse racing (51.55%).

Year	ODIE S.A.	
	Turnover (in euros)	%
2006	337,517,392	
2007	283,149,650	-16.10%
2008	296,755,065	4.80%
2009	260,095,000	-12.40%
2010	193,433,000	-25.60%
2011	123,462,000	-36.20%
2012	84,388,000	-31.60%
2013	65,022,000	-22.90%
2014	49,722,757	-29.20%
2015	34,749,215	-24.50%

TOTAL BETTING TURNOVER OF ODIE S.A. 2010-2015 PER HORSE RACING CATEGORY (in euros)

Year	HORSE RACING CATEGORY									
	GREEK	%	FRENCH	%	ENGLISH	%	SOUTH AFRICAN	%	QUINTE	%
2010	160,445,327	-	32,987,796	-	-	-	-	-	-	-
2011	62,427,031	-61.1%	57,715,988	75.0%	3,319,186	-	-	-	-	-
2012	43,110,180	-30.9%	28,418,640	-50.8%	10,631,597	220.3%	2,227,382	-	-	-
2013	31,428,566	-27.1%	25,623,043	-9.8%	4,207,122	-60.4%	3,498,895	57.1%	264,914	-
2014	18,864,732	-40.0%	27,396,238	6.9%	-	-	3,263,569	-6.7%	198,217	-25.2%
2015	8,143,475	-56.8%	25,526,648	-6.8%	-	-	1,079,092	-66.9%	-	-

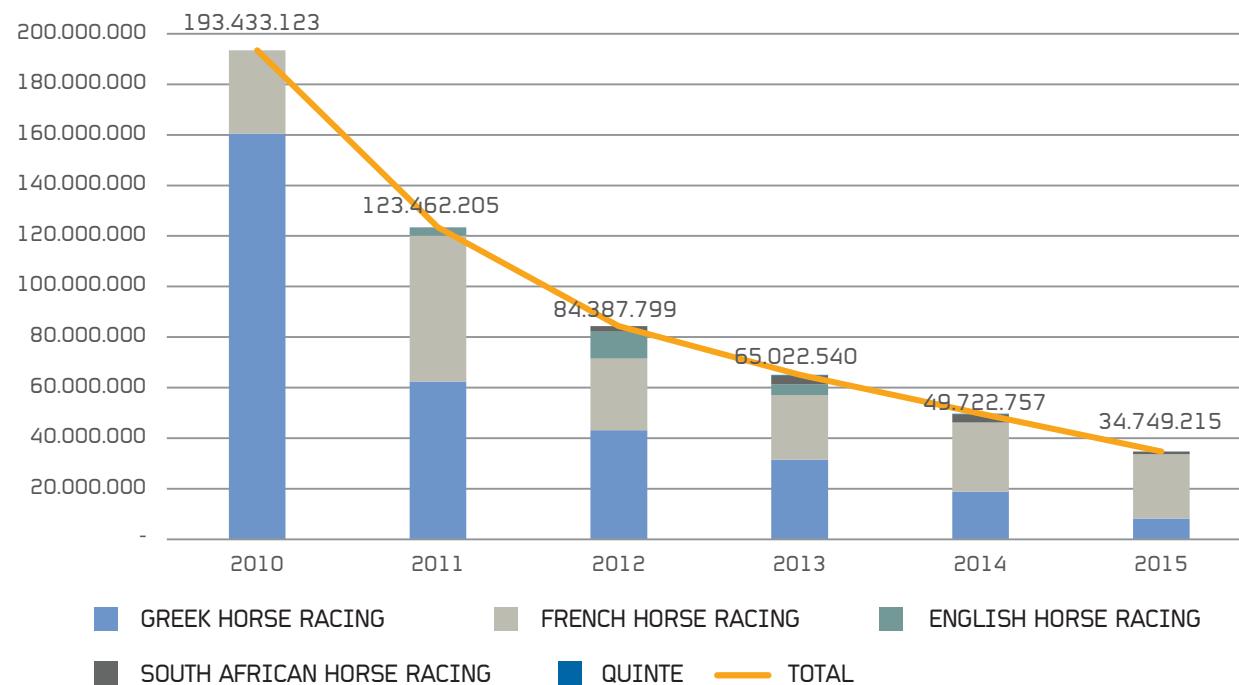
30. Source: HRADF S.A. - Press Release of 23.09.2014.

31. Source: Data provided to the HGC by ODIE S.A. on the account of the company liquidator.

32. In the period 2010-2015, the following horse races were conducted: Greek, French, English and QUINTE.

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

Evolution of turnover of ODIE S.A. per horse racing category (2010-2015)



Betting on Greek Horse Racing and French Horse Racing accounted for 94.79% of total turnover in this period. In 2014 and 2015, French Horse Racing had the biggest share of the horse racing betting market, while Greek Horse Racing's share continued on the downward path it had taken since 2012 already.

PERCENTAGE SHARE OF TOTAL GAMBLING TURNOVER FOR HORSE RACING IN 2010-2015

HORSE RACING CATEGORIES	2010	2011	2012	2013	2014	2015	ΣΥΝΟΛΟ
GREEK HORSE RACING	82.95%	50.56%	51.09%	48.33%	37.94%	23.43%	58.90%
FRENCH HORSE RACING	17.05%	46.75%	33.68%	39.41%	55.10%	73.46%	35.89%
ENGLISH HORSE RACING	-	2.69%	12.60%	6.47%	-	-	3.30%
SOUTH AFRICAN HORSE RACING	-	-	2.64%	5.38%	6.56%	3.11%	1.63%
QUINTE	-	-	-	0.41%	0.40%	-	0.08%
TOTAL	100%	100%	100%	100%	100%	100%	100%

2.3.5. GAMBLING OPERATORS SUBJECT TO THE PROVISIONS OF PARAGRAPH 12, ARTICLE 50 OF LAW 4002/2011

Online gambling is one of the fastest growing gambling sectors at European and international level. In Greece, twenty-four (24) gambling operators are active in this field, on the basis of the transitional regime of paragraph 12, Article 50 of Law 4002/2011 (GG Series A, No. 180),

The operators were placed under the transitional regime of paragraph 12, Article 50 of Law 4002/2011 (GG Series A, No. 180), following the conditions and the procedure established by decision POL 1248/13.12.2011 of the Alternate Minister of Finance.

The companies placed under the above regime, as announced³³ by the Ministry of Finance, are:

1. PERSONAL EXCHANGE INTERNATIONAL LIMITED
2. DIAMOND LINK LIMITED
3. LUCKY STREAM LIMITED
4. SILVER LINK LIMITED
5. GLB GmbH
6. ON LINE AMUSEMENT SOLUTIONS N.V.
7. ON LINE AMUSEMENT SOLUTIONS LIMITED
8. GAMBLING MALTA LIMITED
9. REBELS GAMING LTD
10. SPORTING ODDS LTD
11. KINGMAKER LTD
12. PADDY POWER PLC
13. B2B GAMING SERVICES MALTA LIMITED
14. CASHPOINT MALTA LIMITED
15. AS IMG KASIINOD
16. MAGIC SERVICES LIMITED
17. ELDORADO SPORTWETTEN GmbH
18. STS SPORTWETTEN GmbH
19. YEZ GAMING LTD
20. DOMS HOLDINGS (UK) LIMITED
21. LOGFLEX LIMITED

33. The announcement was posted at the following webpage <http://www.minfin.gr/portal/el/resource/contentObject/id/adce2057-71fb-4925-b094-42ca230af81f>, which is no longer accessible.

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

- 22. DOMS CARS UK LIMITED
- 23. LOVE 2 CELEBRATE LIMITED
- 24. MERIDIAN GAMING LIMITED

It should be noted that under paragraph 12, article 50 of Law 4002/2011, the companies falling under the transitional regime are allowed to provide the gambling and betting services prescribed in the relevant operating and service provision licenses they hold.

Moreover, the responsibility for the audit and collection of state revenue lies with the Ministry of Finance and, in particular, the tax authorities.

It was the Local Tax Office for Large Enterprises that was originally named as the competent service for the above operators. Later on, when the latter was abolished, it was replaced by the Local Tax Office which is responsible for the registered office of the company's representative.

Consequently, the responsibilities of the HGC for these companies are limited to the approval and inspection of the implementation of communication programs and to issues relative to money laundering.

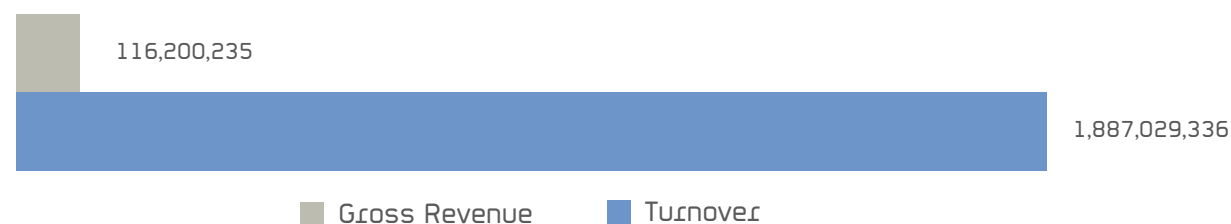
A detailed description of the situation in relation to the transitional regime of paragraph 12 article 50 of Law 4002/2011 (GG Series A, No. 180) has been produced by the HGC and a relevant recommendation was transmitted to the Ministry of Finance.

A final settlement of the issue by granting licenses to online gambling providers is expected to be a catalyst for the smooth operation of this market and remedy the deficiencies of the current legislative framework for the operation and inspection of the companies subject to the transitional regime.

The responsibility for the activation of the relevant process lies with the Ministry of Finance.

Below you can find the turnover and gross revenue for online gambling. These figures were derived from the data declared to the HGC by twenty-one (21) out of the twenty-four (24) companies which are subject to the transitional regime of paragraph 12, Article 50 of Law 4002/2011 (GG Series A, No. 180).

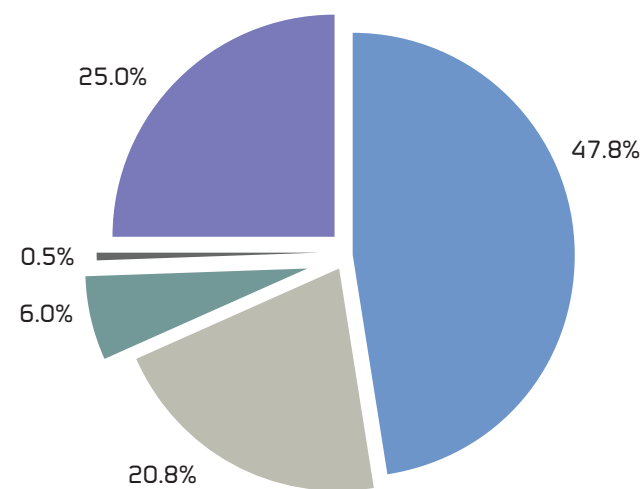
Financial Data on online gambling operated by the companies that are subject to paragraph 12 article 50 of Law 4002/2011 (GG Series A, No. 180) for 2015



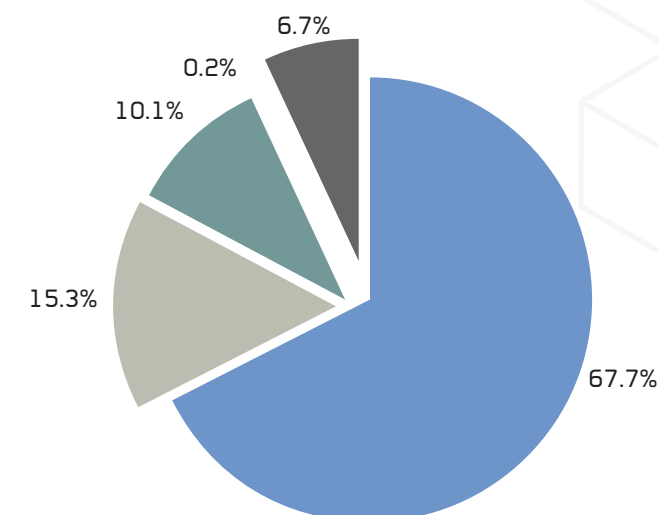
In 2015, the online gambling turnover of the companies subject to the transitional regime of paragraph 12, article 50 of Law 4002/2011 (GG Series A, No. 180) was 1,887,029,336 euros, which accounts for 25% of total gambling turnover in Greece.

However, on the basis of gross revenue, which equals turnover less players' winnings, the above operators' share is calculated at 6.7%, i.e. 116,200,235 euros, out of which 34,903,093 euros are the Greek State's share of online gambling revenue.

Percentage share of turnover in 2015



Percentage share of gross revenue in 2015



- OPAP S.A.
- CASINO ENTERPRISES
- HELLENIC LOTTERIES S.A.
- ODIE S.A.
- ONLINE BETTING COMPANIES

2 AN OVERVIEW OF THE GREEK GAMBLING MARKET

2.4 ILLEGAL GAMBLING

The gambling market has some particular characteristics that create a need for strict legislation regarding its regulation and inspection. Illegal gambling carries an inherent element of risk as regards the commission of crimes, such as fraud, and it is a common way of spending money from illegal sources. Players may end up addicted, bankrupt or dependent on creditors, commit crimes for money that they could then spend on gambling, or become socially isolated and less productive. Furthermore, illegal gambling does not produce any state revenue.

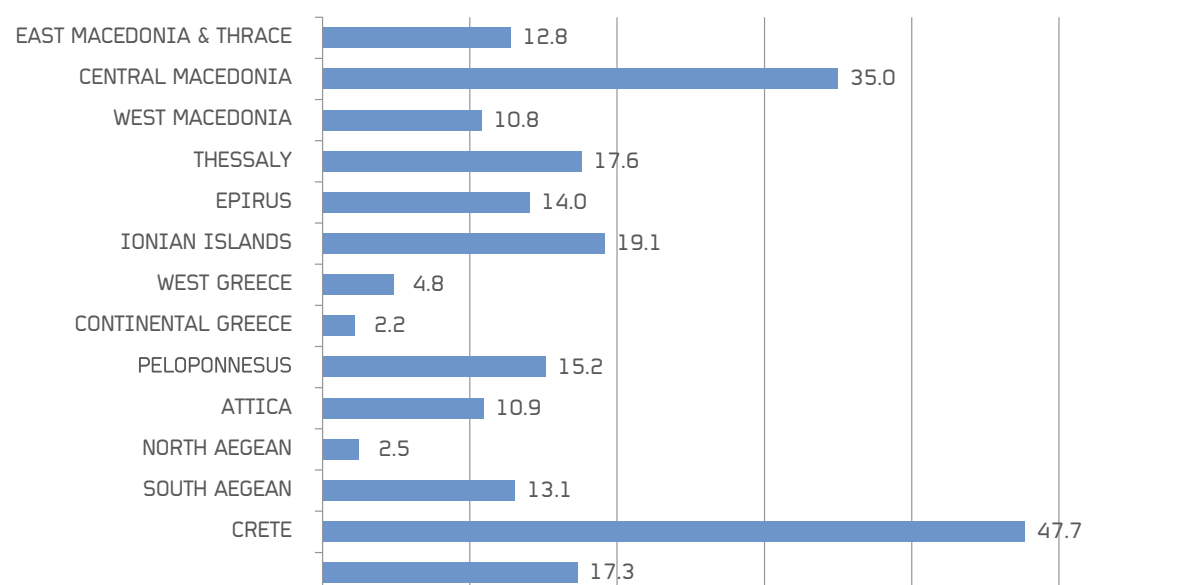
Illegal gambling includes, for example: games played on gaming machines (fruit machines), illegal bets, games played in gambling clubs or other shops and online games and bets.

In its effort to deal with the problem, the State supports the creation of legal, licensed and closely monitored gambling operator networks, with a view to attract the players, but also implements strong repressive measures.

According to Hellenic Police data³⁴, in 2015, four hundred and eighty (480) violations were revealed, 1,513 people were arrested and 160,085.36 euros were seized.

As regards the geographical distribution of the people arrested in the same year, increased criminality is reported in two Regions, as shown by the number of adults arrested per Region. Specifically, in Crete and Central Macedonia the arrest rate per 100,000 adults is 47.7 and 35 respectively.

People arrested per 100,000 adults per Region (2015)



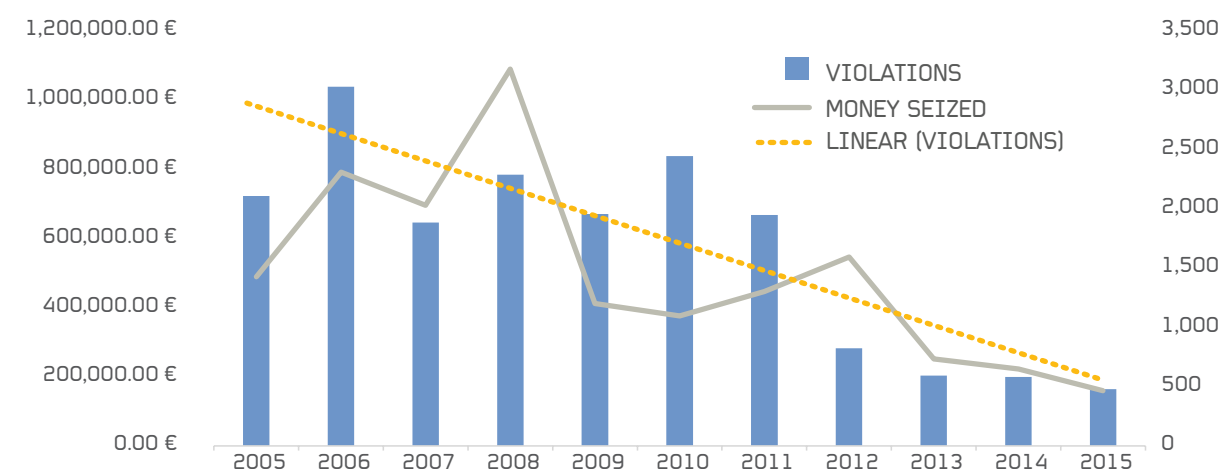
34. Source: Hellenic Police HQ - the data was provided by request of the HGC.

In the period 2005-2015, 18,149 violations were revealed, 28,987 people were arrested and 5,483,891.47 euros were seized along with a significant quantity of illegal gaming equipment, as shown in the following table.

	VIOLATIONS	PEOPLE ARRESTED	MONEY SEIZED
2005	2,109	2,617	€489,495.15€
2006	3,031	3,141	€792,108.97€
2007	1,886	2,405	€695,986.21€
2008	2,289	2,913	€1,090,116.91€
2009	1,958	2,362	412,079.15€
2010	2,446	3,497	€376,097.31€
2011	1,949	3,199	€447,002.35€
2012	825	3,090	€546,475.90€
2013	594	2,295	€251,873.60€
2014	582	1,955	€222,570.56€
2015	480	1,513	€160,085.36€
TOTAL	18,149	28,987	€5,483,891.47€

According to the data made available by the Hellenic Police, the number of violations has declined since 2010. The violations and amounts of money seized decreased in 2015 as compared to 2006, by 84.2% and 79.8% respectively.

Violations – Money seized (2005-2015)



The HGC performs its regulatory tasks with the aim of establishing an institutional framework and standards, in order to ensure that both gambling and the permitted gaming activities are organized and carried out with due regard to transparency and impartiality, that illegal operations and profiteering are prevented, and that the interests of the consumers and the public are effectively protected. The regulatory tasks of the HGC consist in a series of Regulations that apply either to the gaming market as a whole (horizontal) or to specific games or game categories, or, finally, to the operation and the operators of such games.

More specific issues, i.e. regarding licensing terms, the organization and operation of gaming activities and commercial communication, are regulated by the Gaming Regulation, which is established by Presidential Decree that is issued following a recommendation by the HGC. The Regulation also sets proper and easily controllable rules and standards, so as to ensure that all kinds of games of chance, including the licensed amusement games, are organized and carried out with due regard to the law, that illegal operations and profiteering are prevented, and that the interests of the public, especially minors, and the State are protected.

The law (article 54, law 4002/2011) stipulates that until the Gaming Regulation is issued, the issues included in its scope will be regulated by the HGC's decisions. This interim provision has proven a wise choice, because otherwise it would have been impossible and counter-productive to deal with all the specific issues concerning gaming at the same time and as a whole through the long-winded processes required for a Presidential Decree.

The activities in the field of gaming regulation are divided into three individual sections, which present: a) the development and implementation of a statutory framework for gaming, b) the licensing of gaming activities in the cases managed by the HGC, and c) the certifications required for the organization of games.

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

3.1 DEVELOPMENT AND IMPLEMENTATION OF A STATUTORY FRAMEWORK FOR GAMING

The Action Plan 2013-2015 included projects on decisions issued to regulate matters that are related to the Gaming Regulation for almost all the games operated in the Greek Territory (these are called, for the sake of brevity, «Regulations on the operation and compliance inspection» of the individual games).

The annual activity report covers the HGC's activities per game, game category or gaming operator and is presented in conjunction with the projects of the approved Action Plan 2013-2015.

3.1.1 DRAFTING A REGULATION ON THE OPERATION AND COMPLIANCE INSPECTION OF ELECTRONIC AMUSEMENT GAMES PLAYED ON GAMING MACHINES

The project «Drafting a Regulation on the operation and compliance inspection of amusement

games played on gaming machines» (project: 1.1 of the approved Action Plan 2013-2015) was completed and entered into force by virtue of Decision No. 110/2/20.06.2014 (GG Series B, No. 1801) of the HGC, titled: «Drafting a Regulation on the operation and compliance inspection of electronic amusement games played on gaming machines». In the effort to improve the regulatory framework, which is a standard objective of the HGC, the Regulation was amended and codified by Decisions 15/4B/11.07.2014 (GG Series B, No. 2035), 130/2/18.11.2014 (GG Series B, No. 3225) and 139/2/15.01.2015 (GG Series B, No. 223) of the HGC, whereby various provisions, mainly related to compliance inspection, the objective determination of administrative sanctions in case of infringements and the delineation of the areas destined for the installation of gaming machines, were incorporated into the regulatory framework.

3.1.2 DRAFTING A REGULATION ON THE OPERATION AND COMPLIANCE INSPECTION OF ONLINE AMUSEMENT GAMES

As regards the project «Drafting a Regulation on the operation and compliance inspection of online amusement games» (project: 1.2 of the approved Action Plan 2013-2015, the preparatory research and data collection that were necessary for the implementation of the project have been completed.

The research has not found any similar statutory framework elsewhere in Europe. The counterparts of the HGC across the world have not opted for regulating the licensing of providers of online amusement games; thus, no similar experience can be found and used.

It should be noted that these games follow the same trend of development and expansion as the Internet and social networks, which grow fast and produce new data all the time.

At the same time, research so far has shown that the games in question fall under many different categories, such as role playing games, massive multiplayer online role playing games, real time strategy games, etc., which constantly evolve and change depending on content and the equipment used to play the game, such as mobile gaming.

According to literature, a larger number of better documented and, above all, long-term studies is required in order to provide answers as regards the influence of such games.

3.1.3 DRAFTING A REGULATION ON THE OPERATION AND COMPLIANCE INSPECTION OF GAMES OF CHANCE PLAYED ON VLT GAMING MACHINES

Under the project «Drafting a Regulation on the operation and compliance inspection of games of chance played on VLT gaming machines» (project: 1.4 of the approved Action Plan 2013-2015), it was deemed necessary to implement the following amendments of Decision No. 115/2/11.07.2014 (GG Series B, No. 2041) of the HGC titled «Regulation of the operation and compliance inspection of games of chance played on VLT gaming machines», as in force.

a. Decision No. 143/2/6.02.2015 (GG Series B No. 328) of the HGC, regulated matters concerning

- The establishment of a maximum allowed daily spending limit per Player. This limit has to be set by the players themselves to help them internalize the rules of responsible gaming.
- The maximum allowed time limit for participation in games, which is set on a weekly or monthly basis, in order to minimize the factors (duration, frequency, quantity, intensity of game) that lead to problem gambling.
- The establishment of an Operator obligation to interrupt a gaming session when a player exceeds a certain spending limit. The aim is to create a «cooling-off» period during which the players will have the opportunity, on the one hand, to reduce their maximum allowed daily spending limit to the minimum level and, on the other hand, to rethink their gambling habits.
- The definition of a minimum distance between certified premises and schools or residential institutions in order to protect minors from exposure to gambling and avoid normalization (the principle of normalization) of gambling.
- The definition of a minimum distance between certified premises in order to avoid concentration of gambling shops in certain urban areas, which would lead to economies of scale and alteration of these areas.

b. Decision No. 148/2/20.03.2015 (GG Series B, No. 613) of the HGC regulated matters concerning the opening hours and the dimensions of sanitary facilities in the shops.

c. Decision No. 158/4/6.02.2015 (GG Series B No. 1120) of the HGC, amended a series of provisions which aim at

- allowing the Greek State to exercise a consistent and systematic restrictive policy in the gambling sector, in order to protect the public interest, minimize the negative social consequences of gambling (e.g. the waste of disposable income, problem gambling, etc.) and protect vulnerable groups,
- observing the principles (rules) of responsible gaming and minimizing the factors (duration, frequency, quantity, intensity of game) that lead to problem gambling,
- allowing the HGC to exercise its powers and duties of supervision and compliance inspection effectively,
- further ensuring a seamless, sound and reliable operation of gambling services,
- further ensuring an unimpeded inspection of compliance with the withholding and payment to the State of the applicable tax on players' winnings, and the matching of the money spent by the players on gambling with their declared annual income, and
- allowing the payment of the fines imposed by the HGC within a short time from the date the infringement was assessed and the fine was established as a means to encourage compliance and self-restraint on the part of the inspected offender, as there is a direct link between the assessment of the infringement and the sanction imposed.

In this context, the main new rules regarding the participation of players in the games are:

- The personal details required for the issuance of the personal player card will also include from now on the player's Tax Identification Number (TIN).
- A maximum daily loss is established and set at 80 euros.
- The limit for the time spent by players on gaming is reduced to 10 hours per week and 32 hours per month from 12 and 40 hours respectively.
- A gaming session is interrupted when the player has lost 20 euros (instead of 80 euros).
- The maximum jackpot per gaming hall is reduced from 100,000 to 20,000 euros.
- The daily opening hours of gaming halls are reduced by 3 hours.

On 1st July 2015, OPAP S.A. announced to the Athens Stock Exchange the suspension of its activities as an operator of games of chance played on VLT gaming machines for business reasons.

d. Finally, Decision No. 166/4/23.07.2015 (GG Series B, No. 2295) of the HGC regulated matters concerning the supporting documents on fire-safety, but also the straight-line distance from the casinos that already operate in a certain area, which must be larger than five (5) km, as set out in Law. 4002/2011 (GG Series A, No. 180).

3.1.4 DRAFTING THE TECHNICAL SPECIFICATIONS (TS) FOR THE OPERATION OF GAMES OF CHANCE PLAYED ON VLT GAMING MACHINES.

The project «Drafting the technical specifications (TS) for the operation of games of chance played on VLT gaming machines» (project 1.19 of the approved Action Plan 2013-2015) was completed with Decision No. 115/3/11.07.2014 (GG Series B, No. 2042) of the HGC, titled «Regulation of matters related to the technical specifications (TS) for the operation of games of chance played on VLT gaming machines», which lays down the technical specifications that have to be fulfilled by all kinds of machines, equipment, software applications or systems connected with the operation of games of chance played on VLT gaming machines.

In the effort to improve the regulatory framework, which is a standard objective of the HGC, the above Regulation was amended by Decision No. 138/5/19.01.2015 (GG Series B, No. 223) of the HGC. The improvements refer to issues regarding the operation of gaming machines and the Central IT System.

3.1.5 DRAFTING A REGULATION ON THE OPERATION AND COMPLIANCE INSPECTION OF ONLINE GAMBLING

According to the provisions of article 45 of Law 4002/2011 (GG Series A, No. 180), the operation of online gambling in the territory of Greece is the responsibility of the State, exclusively, which acts through its specially authorized gambling providers. The relevant licenses are announced by Decision of the Ministry of Finance and are granted through an international auction.

The above ministerial decision has not been issued yet and, consequently, the regulation will be

issued as soon as the relevant matters are settled, as laid down in Law 4002/2011 (GG Series A, No. 180).

3.1.6 DRAFTING REGULATIONS ON THE OPERATION AND COMPLIANCE INSPECTION OF THE GAMES OPERATED BY OPAP S.A.

As part of the regulation of the games of chance operated by OPAP S.A., the following instruments were issued in 2015:

- a) Decision No. 168/4/30.7.2015 (GG Series B, No. 1959) amending Decision No. 2170/2009 (GG Series B, No. 78) titled «Approval of the «Regulation on the Organization and Operation of the number game KINO operated by OPAP S.A.», as in force, following submission of the relevant proposal by OPAP S.A. and
- b) Decision No. 188/3/30.7.2015 (GG Series B, No. 2928) amending Ministerial Decision No. 2170/2009 (GG Series B, No. 78) titled «Approval of the Regulation on the Organization and Operation of the Number Game KINO operated by OPAP S.A.», as in force, following submission of the relevant proposal by OPAP S.A.

The above amendments concern the number game KINO BONUS.

It should be noted that the HGC has now given priority to the drafting of new regulations for the operation and compliance inspection of the games operated by OPAP S.A.; the relevant projects are part of the Action Plan 2016-2018. Until the new regulations are issued, the current regulations remain in force, in the form stipulated by the ministerial decisions issued when they were originally introduced.

3.1.7 DRAFTING REGULATIONS ON THE GAMES OF CHANCE OPERATED BY HELLENIC LOTTERIES S.A.

The HGC has given priority to the issuance of regulatory decisions on the games operated by Hellenic Lotteries S.A., because the previous operator, i.e. before the concession, was a public sector service and, as a result, a new regulatory framework to ensure the supervision and inspection of compliance of the private provider should be drafted as a matter of urgency. The concession agreement with Hellenic Lotteries S.A., a company of the OPAP S.A. group, entered into force on 1st May 2014; thus, the HGC has already issued all the necessary decisions regarding the regulation of State Lotteries.

3.1.8 DRAFTING A REGULATION ON THE OPERATION AND COMPLIANCE INSPECTION OF MUTUAL BETTING ON HORSE RACING

As part of the project «Drafting a Regulation on the operation and compliance inspection of mutual betting on horse racing» (project: 1.6 of the approved Action Plan 2013-2015) Decision No. 171/14.8.2015 (GG Series B, No. 1708) of the HGC was issued, titled «Regulation on Mutual Betting on Horse Racing».

The regulation provides, among others, for the creation of special regulations on each type of mutual

betting on horse racing, which will determine the terms and conditions for their operation, the method of calculating and paying out winnings to players, the course of action in case of cancellation of races, the maintenance of records and submission of reports, the imposition of administrative sanctions, etc.

It should be noted that priority was given to the regulation of mutual betting on horse racing, which is now operated by a new provider, «Hellas Horse Races S.A.», a private company, member of the OPAP Group, in accordance with the concession agreement dated 29.4.2014, as its previous operator was ODIE S.A. which was owned by the State. Furthermore, Decision No. 191/5/11.01.2016 of the HGC approved the accession agreement that must be concluded between the player and the company Hellas Horse Races S.A., whereby the following issues are regulated: the terms and conditions for participation in mutual betting on horse racing, rules of conduct in the places where mutual betting on horse racing is carried out, as well as the method of paying out winnings to players.

Finally, the completion of the «Technical Regulation on Mutual Betting on Horse Racing is expected for 2016.

3.1.9 DRAFTING A NEW REGULATION ON THE OPERATION AND COMPLIANCE INSPECTION OF CASINO GAMING

As part of the project «Drafting a new Regulation on the operation and compliance inspection of casino gaming» (project: 1.9 of the approved Action Plan 2013-2015), it was deemed necessary to modernize the existing legislative framework and the following amendments were made to the Regulation on the Administrative Control and Supervision of the Operation of Casinos (GG Series B, No. 929/4.7.2003), as in force.

- a. Decision No. 144/2/13.02.2015 (GG Series B No. 362) of the HGC added rules concerning the procedure of ascertaining an infringement, the method of imposing sanctions and the severity of penalties per infringement.
- b. Decision No. 166/8/23.07.2015 (GG Series B No. 1662) of the HGC added rules concerning the procedure of maintaining records and modified the method of calculating the reserve.
- c. Decision No. 160/4B/18.06.2015 (GG Series B, No. 1370) of the HGC defined the procedure to be followed in case of urgent removal of technical equipment and materials used in casino gambling, and technical matters concerning the operation of the roulette.
- d. Decision No. 166/7/23.7.2015 (GG Series B, No. 1763) of the HGC imposed the provisional suspension of the provisions of article 35 of Decision No. T/6736/2003 (GG Series B, No. 929) of the Ministry of Development, titled ««Regulation on the Administrative Control and Supervision of the Operation of Casinos» regarding the calculation of the minimum reserve to be held as a safety and the implementation of a new methodology for its calculation, due to the exceptional financial circumstances in Greece (capital controls). For the same reason, the HGC took similar decisions on OPAP S.A., Hellenic Lotteries S.A. and Hellas Horse Races S.A. In particular, Decisions No.163/6/9.07.2015 (GG Series B, No. 1607) and 191/6/11.01.2016 (GG Series B, No. 500) determined the maximum payout limit for the winning tickets/slips of OPAP S.A., Hellenic Lotteries S.A. and Hellas Horse Races S.A. that can be paid in cash

by the retail shops (agencies) and the cashiers of OPAP S.A., which will now be one thousand five hundred (1,500) euros before taxes.

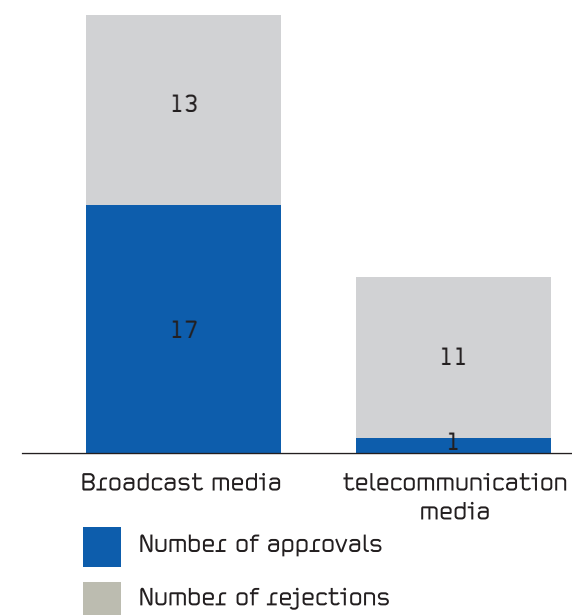
Further improvements to the existing Regulation on the Administrative Control and Supervision of the Operation of Casinos have been scheduled for 2016, with the aim of improving the rules, making compliance inspection more effective and simplifying the procedures.

While modernizing the existing regulation, the HGC also works on the drafting of a new «Regulation on the operation and compliance inspection of casino gambling» (project 1.9 of the approved Action Plan). The new regulation will replace the existing one and will adopt modern perceptions and methods for the supervision and compliance inspection of casino enterprises. It will also codify some existing statutory provisions that will remain in force. The final draft is expected to be approved by the end of 2016, once it has been put to national and European consultation (through TRIS), following the procedure provided for in Directive 98/34/EC.

3.1.10 DRAFTING REGULATIONS ON THE OPERATION AND COMPLIANCE INSPECTION OF GAMES OF CHANCE PLAYED ON BROADCAST AND TELECOMMUNICATION MEDIA

As regards the project «Drafting a Regulation on the operation and compliance inspection of games of chance played on broadcast and telecommunication media» (project: 1.8 of the approved Action Plan 2013-2015):

- The provisions of article 106 of Law 4209/2013 (GG Series A, No. 253) reformulated and supplemented the provisions of article 53 of Law 4002/2011 (GG Series A, No. 180), thus eliminating the legal uncertainty that existed as regards licenses for gambling on broadcast and telecommunications media. The new provisions determined the games played on broadcast and telecommunications media which are subject to a license, as well as all the necessary details on the licensing procedure. With a view to protect consumers, particularly minors and vulnerable groups, only mixed games are subject to a license, i.e. the games that necessarily consist of at least one phase that is based on skill and at least one phase that is based on luck; in other words games of pure chance are excluded. Furthermore, the game of chance has to be played and broadcast live and a natural person has to take part in it as a presenter.
- In this context, by virtue of its Decision No. 93/2/28.01.2014 (GG Series B, No. 205), the HGC put into force the «General Principles and Rules on the Operation of Gambling on Broadcast Media», according to which the above games may be operated during the transitional period until the Regulation is issued and licenses are granted, provided that the operators of the above games submit a Declaration of Acceptance of the terms of the above decision of the HGC. Subsequently, the HGC has to check the Declaration of Acceptance to establish that it is comprehensive of all the elements required and enter the game and its details in the List of games of chance played on broadcast and telecommunications media published on the HGC website (www.gamingcommission.gov.gr). The games may be played and broadcast only after their details have been posted on the website of the HGC.



In 2015, the HGC received Declarations of Acceptance of the General Principles for forty-two (42) games. Thirty (30) of those Declarations concerned games on broadcast media and the other twelve (12) referred to games played on telecommunications media. Rules of operation were issued for a total of eighteen (18) games, seventeen (17) of them being played on broadcast media and one (1) on telecommunications media, while twenty-four (24) games were rejected, thirteen (13) of them being played on broadcast media and eleven (11) on telecommunications media. As regards the twenty-four (24) games that were rejected, a reply letter was sent to the providers explaining the grounds for rejection. On 31st December 2015 twenty-nine (29) games were still displayed on the website. Eighteen (18) of them from the year 2015 and eleven (11) from 2014.

c. Finally, in the effort to protect the consumers at large and particularly minors and vulnerable groups, who are subject to unlimited solicitation by the relevant providers to take part in such games being inexperienced and ignorant, the HGC, by its Decisions 124/2/29.09.2014 and 158/3/05.06.2015, recommended to the Greek state to impose a blanket ban on gambling on broadcast and telecommunications media³⁵.

3.1.11 DRAFTING A REGULATION ON GAMING PENALTIES

The project «Drafting a Regulation on Gaming Penalties» (project: 1.11 of the approved Action Plan 2013-2015) was already completed in 2014, by specifying the administrative sanctions applicable in case of violation of the legislative and regulatory framework for the organization and operation of games.

A Working Group was formed already in 2014, by virtue of Decision No. PRP4685140714/14.07.2014 of the President of the HGC, in order to specify the administrative sanctions applicable in case of violation of the legislative and regulatory framework for the organization and operation of games.

The deliverable of the Working Group titled «Preparation of a draft decision on the regulation of matters related to the imposition of administrative sanctions in case of violation of the legislative and regulatory framework for the organization and operation of games», is being gradually incorporated into the relevant sections of the Gaming Regulation.

35. See paragraph 8.3

In this context, in 2015, the regulation of matters related to the imposition of administrative sanctions in case of violation of the legislative and regulatory framework for the organization and operation of games was incorporated into:

- a. Regulation on Commercial Communication in Gambling, by virtue of Decision No. 163/4G/09.07.2015 (GG Series B, No. 1824) of the HGC, as in force, and
- b. Regulation on Mutual Betting on Horse Racing, by virtue of Decision No. 171/14.08.2015 (GG Series B, No. 1708) of the HGC.

3.1.12 HORIZONTAL REGULATIONS

By Decision No. 144/3a/13.02.2015 (GG Series B No. 403) of the HGC, titled: «Drawing up the special Register of paragraph 3, article 52A of Law 4002/2011 (GG Series A, No. 180) as in force», the HGC has created the Special Register of gambling equipment providers of paragraph 3, article 52A of Law 4002/2011 (GG Series A, No. 180), which includes all the persons or entities that import and/or trade in any kind of gambling equipment except for playing cards. Non-registered persons or entities are not allowed to import or trade in the above equipment. Twenty-two (22) companies applied and were entered into the register in 2015.

By Decision No. 156/3/27.04.2015 (GG Series B No. 1370) of the HGC, titled: «Defining the dismantling process and the type and content of the special report of paragraph 2, article 52A of Law 4002/2011 (GG Series A, No. 180), as in force», the HGC defined the procedure for dismantling any type of gaming machine and/or gaming equipment that is found during inspections not to have a statutory certification or suitability license. These are dismantled on the spot by the inspecting body, after having been reported and photographed.

By Decision No. 161/2/23.06.2015 (GG Series B No. 2295) of the HGC, titled: «Defining the prior approval for the marketing and sale of all types of gambling equipment, except for playing cards, of paragraph 4, article 52A of Law 4002/2011 (GG Series A, No. 180), as in force», the HGC defined the procedure for the prior approval that it grants for the marketing and sale of all kinds of gambling equipment, except for playing cards. One (1) notification was received and approved in 2015.

3.2 LICENSING OF GAMING OPERATIONS

An administrative license is required for the operation of the permitted games, which is issued - in the majority of cases - by the Minister of Finance. According to the applicable provisions, the HGC is responsible for issuing the licenses regarding the operation of games of chance on broadcast and telecommunications media.

The HGC is also responsible (article 38, Law 4002/2011) for granting the relevant licenses for the operation of amusement games played on gaming machines.

In addition, the HGC has a responsibility, which was handed over to it by the Ministry of Tourism, in accordance with article 92 of Law 4182/2013 (GG Series A, No. 185), to modify any license for the establishment and operation of the casinos operating in the country.

The annual activity report in this field covers the activities per game, game category or gaming operator and is presented in conjunction with the projects of the approved Action Plan 2013-2015.

3.2.1 ISSUANCE OF OPERATING LICENSES FOR ELECTRONIC AMUSEMENT GAMES PLAYED ON GAMING MACHINES.

An operator of amusement games played on gaming machines can be a sole proprietorship, a legal entity in the form of a partnership or a company with share capital, which is taxed in accordance with the general provisions of Law 2238/1994 (GG Series A, No. 151), as in force. It is not allowed to grant an operation license for amusement games to not-for-profit legal entities.

Natural persons who are in the management or administration of the companies that apply for an operation license should not have:

- a) a final conviction for felony or any punishment for theft, misappropriation, fraud, infidelity, receipt, handling and dealing with the proceeds of crime, active or passive bribery, dangerous or serious bodily injury, concealment of a crime, currency crimes, generally dangerous crime, crime against personal freedom, crime against sexual freedom, crime related to the exploitation of sexual life and any crime laid down in the laws on drugs, arms, explosives and tax evasion,
- b) a final conviction for felony or any punishment for a crime laid down in the legislative and regulatory framework for gaming.

To issue a license for electronic amusement games played on gaming machines (project: 2.1 of the approved Action Plan 2013-2015), a relevant application needs to be filed with the HGC, which should contain the details of the operator applying and the number of certified gaming machines to be operated by the undertaking, in accordance with Decision No. 130/2/18.11.2014 (GG Series B, No. 3225) of the HGC. «Regulation of matters related to the operation and compliance inspection of Electronic Amusement Games Played on Gaming Machines», as in force. Applications are not only electronically filed, but also managed and processed, through the «IT System for the Operation and Compliance Inspection of the operation and certification of electronic amusement games and games of chance played on gaming machines». The competent department of the HGC evaluates the applications and verifies that the necessary supporting documents have all been submitted and are complete. Any modification of the status of any operating license is also made electronically. Finally, the system supports the creation of a relevant Register for Licensed Operators of Electronic Amusement Games, which is posted on the website of the HGC (www.gamingcommission.gov.gr).

The submission of applications for license started in the 1st quarter of 2015. By 31st December 2015 fifty-two (52) operating licenses for electronic amusement games played on gaming machines were submitted, out of which forty-nine (49) were approved and one (1) was rejected, as shown in the table below. In percentage terms, 96.2% of the applications were processed and 94.2% were approved. The number of gaming machines that correspond to the forty-nine (49) licensed operators is one thousand one hundred and seven (1,107) gaming machines. Seven hundred and thirty-five (735) of those machines have been certified and entered in the relevant register, while the applications for the remaining ones have not been filed yet (see section 3.3.1).

Issuance of operating licenses for electronic amusement games played on gaming machines (2015)

Type of Application	Applications Filed	Applications Approved	Applications Rejected	Capacity of gaming machines	Processing rate	Approval rate
Operating License	52	49	1	1,107	96.2%	94.2%

The project is ongoing and is expected to be also running under the new Action Plan 2016-2018.

3.2.2 EXAMINATION OF APPLICATIONS FOR MODIFICATION OF THE TERMS OF CASINO LICENSES AND THEIR OPERATING CONDITIONS

As from the date that Decision No. 85/8/16.12.2013 (GG Series B, No. 3353) of the HGC entered into force, an approval is no longer required for making minor changes to certain aspects of the operation of casino enterprises, the only requirement being that the HGC is timely notified of those changes; in this way, the procedure was simplified and administrative costs were reduced not only to the benefit of casinos, but also of the HGC and by extension of the Greek State. As a result of the new provisions, in 2015, the HGC received and reviewed a total of one hundred and eighty-two (182) notifications of changes, as shown in the following table.

Notifications of changes in the operation of casinos		
No.	Type	Amount
1	Modification of stand-alone progressive functions	2
2	Installation or modification or relaunch of interconnected progressive functions	22
3	Abolition of stand-alone progressive functions	1
4	Abolition of interconnected progressive functions and transfer of the progressive amount	7
5	Gaming reserve	3
6	Operating hours	21
7	Changes in personnel	9
8	Changes of position of technical equipment or changes in casino areas	19
7	Removal or destruction of machines or tables	38
10	Rearrangement of tables and machines	16
11	Reduction in the variable starting amount of an interconnected progressive function and its transfer	2
12	Installation or modification of machines and/or tables	24
13	Works performed	8
14	Transport to/ from the warehouse and installation of equipment and material in the gaming area	8
15	Installation or modification of operations of maximum profit	2
Total		182

Two (2) of those notifications were related to modifications in stand-alone progressive functions, twenty-two (22) to the installation or modification or relaunch of interconnected progressive functions, one (1) to the abolition of a stand-alone progressive function, seven (7) to the abolition of interconnected progressive functions and transfer of the progressive amount, three (3) to the gaming reserve, twenty-one (21) to trading hours, nine (9) to changes in personnel, nineteen (19) to changes of position of technical equipment or changes in casino areas, thirty-eight (38) to the removal or destruction of machines or tables, sixteen (16) to the rearrangement of tables and machines, two (2) to the reduction of the variable starting amount of an interconnected progressive function and its transfer, twenty-four (24) to the installation or modification of machines and/or tables, one (1) to works performed, eight (8) to the transport to/ from the warehouse and the installation of equipment and materials in the gaming area, seven (7) to the certification of persons and two (2) to the installation or modification

of operations of maximum profit. It should be noted that the above modifications are carried out by the casino enterprises under the supervision of the Inspection Teams of the HGC that are present on-site, no earlier than seven (7) calendar days from the relevant notification.

Furthermore, the HGC examined several requests for the rearrangement of casino gaming areas and issued eight (8) decisions.

Finally, four (4) decisions were issued by the HGC, whereby the licenses for the establishment, function and operation of four (4) casinos were amended. Specifically:

- By virtue of its Decision No. 166/6/23.07.2015 (GG Series B, No. 2295), the HGC approved the request of the joint venture operating the Florina Casino to amend Decision No. 2554/21.12.1995 (GG Series B, No. 1083) of the Minister of Tourism titled «Granting a license for the establishment, function and operation of a casino in the area of Florina» as to the duration of the rearrangement of the casino gaming areas, which was deemed necessary by the joint venture in order to make the casino operational.
- By virtue of its Decision No. 186/2/20.11.2015 (GG Series B, No. 2716) the HGC approved the amendment of Decision No. 2064/1.12.1994 (GG Series B, No. 904) of the Minister of Tourism titled «Decision No. 2096/9.12.1994 (GG Series B 994/30.12.1994) of the Minister of Tourism granting a license for the establishment, function and operation of a casino in Porto Carras, in Chalkidiki», as in force, with regard to the relocation of the Salon Prive private gaming facilities to Hotel MELITON.
- By virtue of its Decision No. 146/2a/06.03.2015 (GG Series B, No. 494) the HGC approved the amendment of Decision No. T/633/29.5.1996 (GG Series B, No. 438) of the Minister for Development titled «Granting a license for the establishment, function and operation of a casino on the island of Rhodes», as in force, with regard to the composition of technical equipment and materials used in casino gambling.
- By virtue of its Decision No. 155/7/24.04.2015 the HGC approved the amendment of Decision No. 18/3- 1-1996 (GG Series B, No. 17) of the Minister for Development titled «Granting a license for the establishment, function and operation of a casino in Achaia», as in force, with regard to the approval of its relocation.

3.2.3 ISSUANCE OF OPERATING LICENSES FOR GAMBLING ON BROADCAST MEDIA

The «Issuance of operating licenses for gambling on broadcast media»(project: 2.3 of the approved Action Plan 2013-2015), will start once the relevant Regulation has been approved and published.

The project is ongoing and is expected to be also running under the new Action Plan 2016-2018.

3.2.4 CHARACTERIZATION OF GAMES

In the project «Characterization of games played on broadcast or other telecommunications media as games that involve or do not involve chance», (project: 3.4 of the approved Action Plan 2013-2015), thirty-seven (37) applications for characterization were submitted to the HGC in 2015, as shown in the table below.

Type of Application	Number of Applications	Number of Decisions
Characterization of games on broadcast media as games that involve or do not involve chance.	28	12
Characterization of TV games TV as games that involve or do not involve chance.	9	6
Total	37	12

Twenty-eight (28) of those applications were related to the characterization of games played on broadcast media and nine (9) to telecommunications media. Eighteen (18) decisions were issued, twelve (12) on games played on broadcast media and six (6) on games played on telecommunications media. As for the remaining applications, which did not contain the information needed to allow characterization, explanatory letters were sent to the providers.

In addition, copies of the recommendations on the characterization of games were granted to the providers having requested such copies in writing and clarifications were provided as to the regulatory framework concerning the games in question.

As to the project «Characterization of games as electronic amusement games or other» (project 3.14 of the approved Action Plan 2013-2015), fifteen (15) requests for clarification of the nature of certain electronic amusement games were submitted in order to decide whether they fall under item cc, paragraph a, article 25 of Law 4002/2011 (GG Series A, No. 180), which specifies that such games have to be certified by the HGC.

Submitted by			
Type of Request	Public Authorities	Individuals	Total
Characterization of games as electronic amusement games or other	2	13	15

As shown in the table above, thirteen (13) of those requests were submitted by individual citizens and two (2) of them by other co-competent authorities. All the requests were handled promptly and answered in full.

Finally, the HGC received various questions from individual citizens or social stakeholders regarding either clarifications on the legality or non-legality of the operation of games in social gatherings or the granting of operating licenses for various types of games through the existing operators.

It should be noted that once a game is characterized as game of chance, its operation is governed by the provisions of the legislative and regulatory framework applicable to gambling and is subject to the limitations established by the law.

In 2015, a total of four (4) questions of this nature were received, two (2) from individual citizens and two (2) from social stakeholders.

The following table presents a breakdown of the questions processed by type and entity having raised the question.

Submitted by			
Type of Question	Individuals	Social stakeholders	Total
Characterization of games as electronic amusement games or other	2	2	4

All the above questions and requests were handled promptly and answered in full.

3.3 CERTIFICATES FOR ORGANIZING GAMES

Both the primary and the secondary (statutory) legislation set some rules and specifications that have to be fulfilled by the technical equipment, systems and other means used, the professionals involved and the sites of distribution of these games to ensure the credibility of gambling.

The HGC has been assigned the responsibility for issuing the certifications or suitability licenses that is required in each case for the technical equipment used in gambling, the professionals involved, as well as the sites providing such services. Equivalent certifications are also necessary for the operation of electronic amusement games played on gaming machines, mainly in order to prevent the conversion of the above games into games of chance.

The annual activity report in this field covers the activities per game, game category or gaming operator and is presented in conjunction with the projects of the approved Action Plan 2013-2015.

3.3.1 CERTIFICATION OF THE OPERATION OF ELECTRONIC AMUSEMENT GAMES PLAYED ON GAMING MACHINES

The electronic submission, processing and handling of applications for «Certification of Technicians in the field of electronic amusement games» (project: 3.11 of the approved Action Plan 2013-2015) started in July 2014, on the basis of Decision No. 107/5/30.05.2014 (GG Series B, No. 1637) of the HGC titled «Drafting a regulation on the certification of Technicians in the field of electronic amusement games and gaming machines and in the field of VLT games and gaming machines, as well as on the creation of the relevant registers», as in force, following the activation of the respective application of the IT system for the management and compliance inspection of the operation and certification of electronic amusement games and games of chance played on gaming machines.

In 2015, fifty-seven (57) applications for the certification of Technicians in the field of electronic amusement games and gaming machines were processed and handled, out of which fifty-three (53) were approved and four (4) were rejected, as shown in the following table. In percentage terms, 100% of the applications were processed and 93% were approved. Out of fifty-seven (57) applications for certification of Technicians in the field of electronic amusement games and gaming machines, sixteen (16) concern applications that had already been submitted in 2014.

Certification of technicians in the field of electronic amusement games played on gaming machines (2015)					
Type of Application	Applications Filed	Applications Approved	Applications Rejected	% Applications Processed	% Applications Approved
Technicians of electronic amusement games and gaming machines	57	53	4	100%	93%

The electronic submission, processing and handling of applications for:

- «Certification of electronic amusement games» (project 3.1 of the approved Action Plan 2013-2015).
- «Certification of gaming machines used for electronic amusement games» (project 3.5 of the approved Action Plan 2013-2015).
- «Certification of premises operating electronic amusement games» (project 3.7 of the approved Action Plan 2013-2015).

started as soon as the IT system of the HGC was put into full and productive operation, early December 2014.

A breakdown of certifications, by certification type, and the results of the evaluation of the supporting documents required for 2015 are presented in the following table.

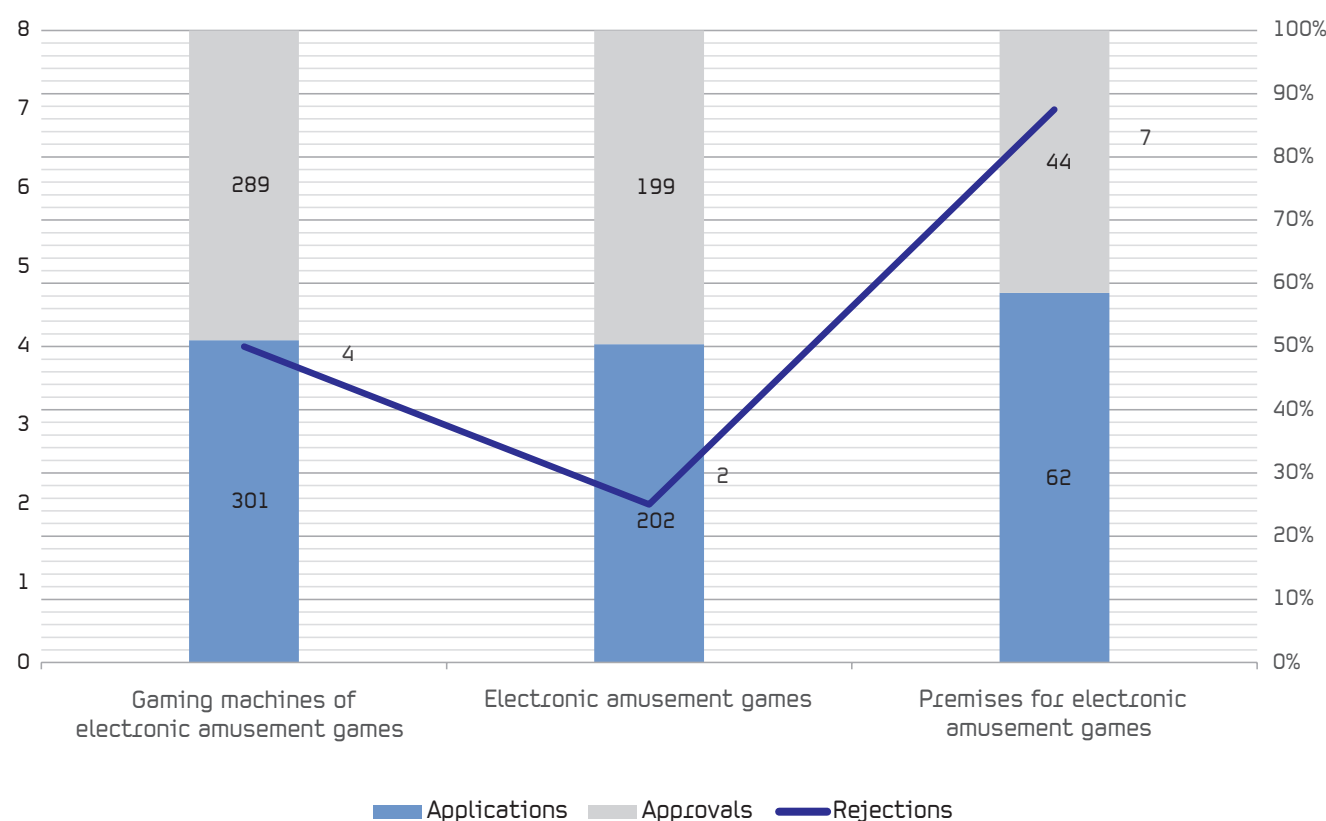
Certification of the operation of electronic amusement games played on gaming machines (2015)						
Type of Application	Applications Filed	Applications Approved	Applications Rejected	Number of items	% Applications Processed	% Applications Approved
Gaming machines for electronic amusement games	301	289	4	735 ³⁶	97,3%	96,0%
Electronic amusement games	202	199	2	199 ³⁷	99,5%	98,5%
Premises for electronic amusement games	62	44	7	591 ³⁸	82,3%	71,0%
Total	565	532	13		96,5%	94,2%

36. Number of gaming machines certified and published in the Register.

37. Number of games certified and published in the Register.

38. Number of gaming machines allowed in the premises which have been certified and published in the Register.

Certification of the operation of electronic amusement games played on gaming machines (2015)



A total of five hundred and sixty-five (565) applications for certification of Gaming machines, Games and Premises for electronic amusement games played on gaming machines have been submitted, out of which five hundred and thirty-two (532) have been approved and thirteen (13) have been rejected. In percentage terms, 96.5% of the applications were processed and 94.2% were approved. The smallest percentage of applications processed and approved concerns the certification of premises operating electronic amusement games (82.3% and 71% respectively). The main reasons why the applications for certification in question were rejected were either an application for revocation of the application by the applicants themselves, or the failure to present the required documents, despite the service's repeated reminders. It is worth, however, noting that long periods are required to retrieve any missing documents for this specific type of applications, because many of these documents need to be issued by other jointly responsible bodies and services (urban planning and local authorities, health services, fire or/and port service etc.).

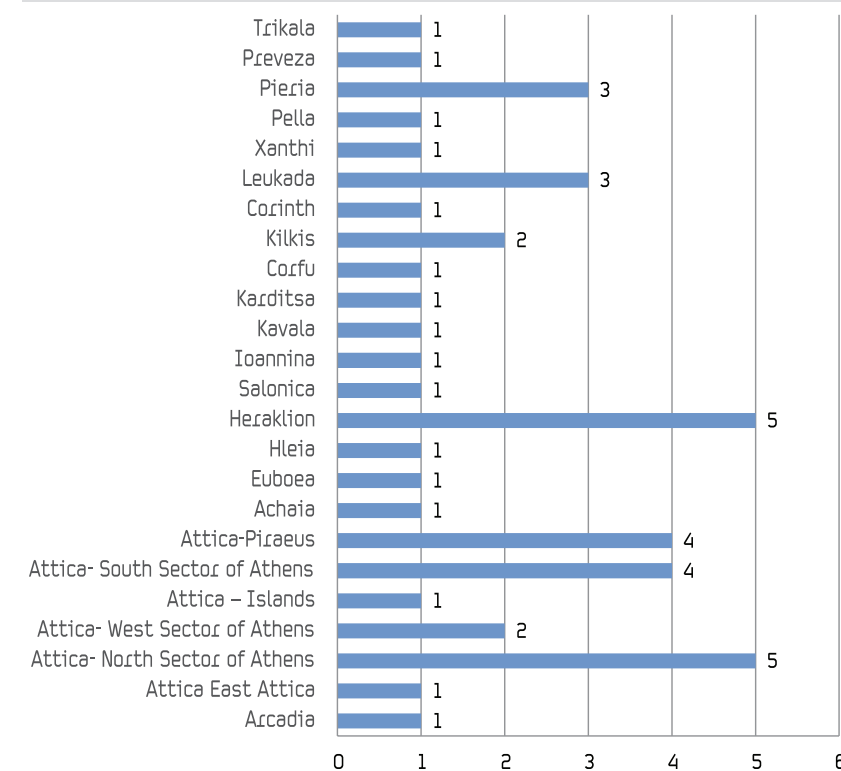
The result of the above process was the gradual compilation of the registers for the Operators of the certified Games, Gaming machines and Premises operating electronic amusement games played on gaming machines as well as of the Certified Technicians of electronic amusement games played on gaming machines.

On the basis of the approvals granted, all licensed operators have now been entered in the relevant Registers, along with the gambling equipment (Games, Gaming Machines, Premises) and the certified Technicians. This is an overview of the data currently available in the relevant registers:

Registers for the operation of electronic amusement games played on gaming machines.	Registered items	Capacity	Gaming machines	Number of gaming machines allowed in the certified premises
Operators	49	1.107		
Gaming machines	735		735	
Games	199			
Premises	44			591
Technicians	80			

The information in the registers shows that forty-nine (49) licenses for Operators with a total capacity of one thousand one hundred and seven (1,107) gaming machines have been issued and are in force. Seven hundred and thirty-five (735) of these gaming machines have been certified and entered in the Register, while for the rest the relevant applications have not been submitted yet. Moreover, one hundred and ninety-nine (199) electronic amusement games and forty-four (44) premises were certified across the country with a total capacity of five hundred and ninety-one (591) allowed gaming machines. The following chart shows the geographical distribution of the certified premises for the operation of electronic amusement games played on gaming machines per Regional Unit.

Distribution of electronic amusement games and gaming machines, per Regional Unit (2015)



Finally, a total of eighty (80) technicians of electronic amusement games played on gaming machines were entered in the Register, out of which seventy-six (76) are natural persons and four (4) legal entities. Among the technicians who had already been certified in 2014, eighteen (18) did not pay the annual duty to renew their certification and were removed from the Register. The number of applications for the certification of Technicians of electronic amusement games played on gaming machines is expected to be progressively lower over the following years, as the rate of increase in operating licenses and certifications of electronic amusement games played on gaming machines stabilizes and the specific market gradually becomes more balanced from a regulatory point of view. All the registers are published on the HGC website (www.gamingcommission.gov.gr).

The projects are ongoing and are expected to be also running under the new Action Plan 2016-2018.

3.3.2 CERTIFICATION RELEVANT TO VTL GAMBLING.

The electronic submission, processing and handling of applications for «Certification of Technicians in the field of games of chance and VLT gaming machines» (project 3.12 of the approved Action Plan 2013-2015) was made possible in July 2014, following the activation of the IT system for the management and compliance inspection of the operation and certification of electronic amusement games and games of chance played on gaming machines and in application of Decision No. 107/5/30.05.2014 (GG Series B, No. 1637) of the HGC, as in force.

The certified Technicians are entered in the Technicians' Register that the HGC keeps and has published on its website (www.gamingcommission.gov.gr), which allows an entry search on the basis of specific search criteria, such as specialty or geographical area. The Register is being constantly updated.

From 1st January until 31st December 2015, a total of one hundred and twenty-one (121) new applications for certification of VLT Technicians (116 natural persons and 5 legal entities) were submitted.

A total of one hundred and forty-five (145) applications were approved, taking also into account the applications for the year 2014, and nineteen (19) were rejected, while eighty-two (82) applications were revoked. The total number of certified Technicians of games of chance and VLT gaming machines that were entered in the Register was two hundred and fifty-one (251).

The electronic submission, processing and handling of applications for:

- «Certification of games of chance played on VLT gaming machines» (project 3.2 of the approved Action Plan 2013-2015),
- «Certification of VLT gaming machines» (project 3.6 of the approved Action Plan 2013-2015),
- «Certification of premises operating games of chance played on VLT gaming machines» (project 3.8 of the approved Action Plan 2013-2015),

d. «Certification of Manufacturers of games of chance and VLT gaming machines» (project 3.9 of the approved Action Plan 2013-2015),

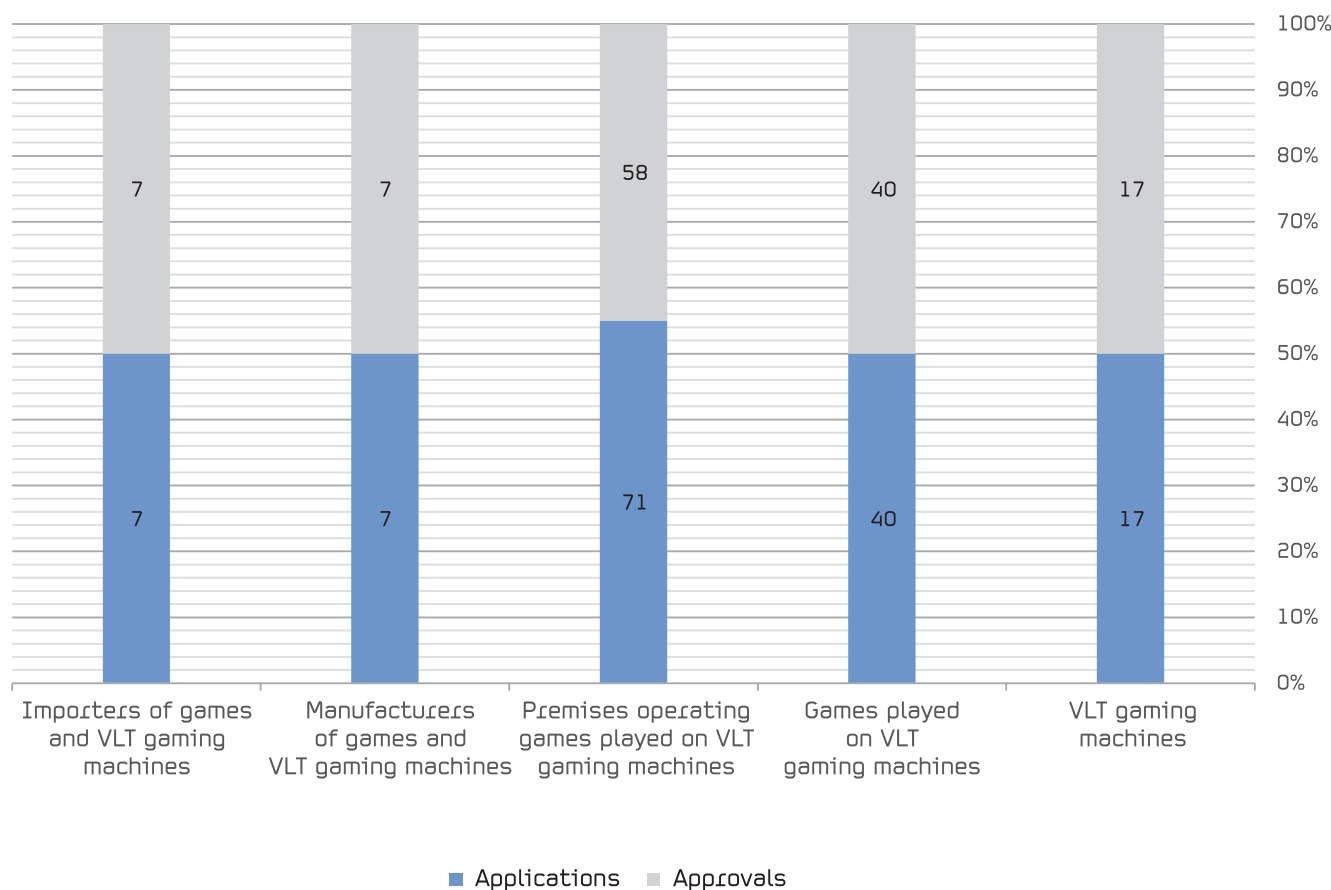
e. «Certification of Importers of games of chance and VLT gaming machines» (project 3.10 of the approved Action Plan 2013-2015),

started as soon as the «IT system for the management and compliance inspection of the operation and certification of electronic amusement games and games of chance played on gaming machines» was put into full productive operation, early December 2014.

A breakdown of certifications, by certification type, and the results of the evaluation of the supporting documents required for 2015 are presented in the following table.

Certification of Importers, Manufacturers, Premises, Games and VLT Gaming Machines (2015)						
Type of Application	Applications Filed	Applications Approved	Applications Rejected	Certified Gaming Machines	Applications Processed i (%)	Applications Approved (%)
Importers of games and VLT gaming machines	7	7	0		100.0%	100.0%
Manufacturers of games and VLT gaming machines	7	7	0		100.0%	100.0%
Premises operating games played on VLT gaming machines	71	58	0		81.7%	81.7%
Games played on VLT gaming machines	40	40	0		100.0%	100.0%
VLT gaming machines	17	17	0	6,739	100.0%	100.0%
Total	142	129	0		90.8%	90.8%

Certification of Importers, Manufacturers, Premises, Games and VLT Gaming Machines (2015)



A total of 142 applications for certification of the operation of games of chance played on VLT gaming Machines, seven (7) of which concerned importers, seven (7) manufacturers, seventy-one (71) gambling premises, forty (40) games and seventeen (17) gaming machines, accounting for a total capacity of six thousand seven hundred and nine (6,709) gaming machines. The applications for certification of importers, manufacturers, games and gaming machines were all processed and approved in their entirety. As regards gambling premises, in a total of seventy-one (71) submitted applications, fifty-eight (58) were processed and approved, and as a result the percentage of applications processed and approved was 81.7%.

The timeline of the submitted applications and the approved certifications, by application type and month, is shown in the following tables.

Certification of Importers, Manufacturers, Premises, Games and VLT Gaming Machines (2015)

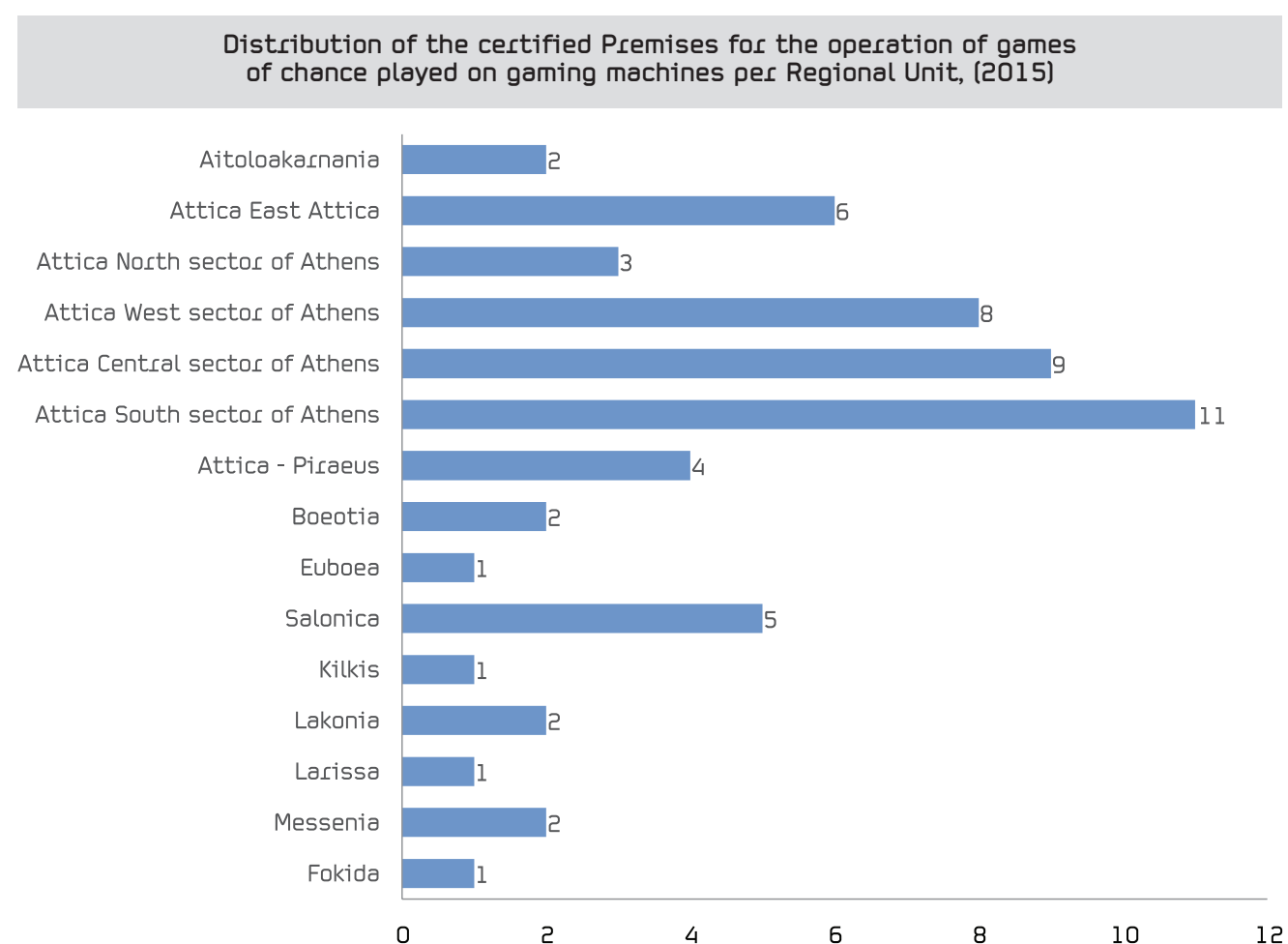
Application Type	Applications Filed							
	until 06/2015	07/2015	08/2015	09/2015	10/2015	11/2015	12/2015	Total
Importers of games and VLT gaming machines	4	0	3	0	0	0	0	7
Manufacturers of games and VLT gaming machines	7	0	0	0	0	0	0	7
Premises operating games played on VLT gaming machines	4	10	16	27	14	0	0	71
Games played on VLT gaming machines	30	0	5	0	5	0	0	40
VLT gaming machines (for every x gaming machines)	10 (6,271)	0 (0)	3 (30)	3 (390)	1 (48)	0 (0)	0 (0)	17 (6,739)
Total	55	10	27	30	20	0	0	142

Certification of Importers, Manufacturers, Premises, Games and VLT Gaming Machines (2015)

Application Type	Applications approved							
	μέχρι 06/2015	07/2015	08/2015	09/2015	10/2015	11/2015	12/2015	Total
Importers of games and VLT gaming machines	4	0	1	2	0	0	0	7
Manufacturers of games and VLT gaming machines	7	0	0	0	0	0	0	7
Premises operating games played on VLT gaming machines	0	0	10	15	30	3	0	58
Games played on VLT gaming machines	25	4	1	5	5	0	0	40
VLT gaming machines (for every x gaming machines)	10 (6,271)	0 (0)	0 (0)	6 (420)	1 (48)	0 (0)	0 (0)	17 (6,739)
Total	46	4	12	28	36	3	0	129

In particular, until 1st July 2015 (when OPAP S.A. announced to the Athens Stock Exchange the suspension of its business activities in the field of VLTs), a total of fifty-five (55) applications for certification had been submitted, four (4) of which concerned premises, thirty (30) referred to games, and ten (10) to gaming machines, accounting for a total capacity of six thousand two hundred and seventy-one (6,271) gaming machines.

The following chart shows the geographical distribution of the premises that have been certified for the operation of games of chance played on VLT gaming machines per Regional Unit.



Until 31st December 2015, the items included in the registers of certified importers, manufacturers, premises, games and VLT gaming machines that the HGC compiles and publishes on its website were:

Registers of the operation of games of chance played on VLT gaming machine	Registered items 2015
Importers	7
Manufacturers	7
Premises	58
Games	40
Gaming machines	6.739
Technicians	251

The projects are ongoing and are expected to be also running under the new Action Plan 2016-2018.

3.3.3 PROVISION OF SUITABILITY LICENSES FOR TECHNICAL EQUIPMENT AND MATERIALS USED IN CASINO GAMING

The project «Provision of suitability licenses for technical equipment and materials used in casino gaming», previously titled «Certification of casino gambling and gaming machines» (project: 3.3 of the approved Action Plan 2013-2015) started in the 3rd quarter of 2013, is ongoing and is expected to be also running under the new Action Plan 2016-2018. Until 31st December 2015, the following actions had been taken:

- As part of the licensing of Manufacturers of technical equipment and materials used in casino gaming, in a total of eight (8) applications, two (2) suitability licenses were granted and six (6) were renewed or modified.
- As part of the licensing of Maintenance Technicians for technical equipment and materials used in casino gaming, a total of sixty-four (64) Maintenance Technicians were granted a suitability license. Fifty-nine (59) of them were casino employees and five (5) were employees of a third company.
- As part of the licensing of technical equipment and materials used in casino gaming, in a total of two hundred (200) applications, one hundred and ninety-four (194) new suitability licenses were issued. For the remaining applications additional documents were requested.

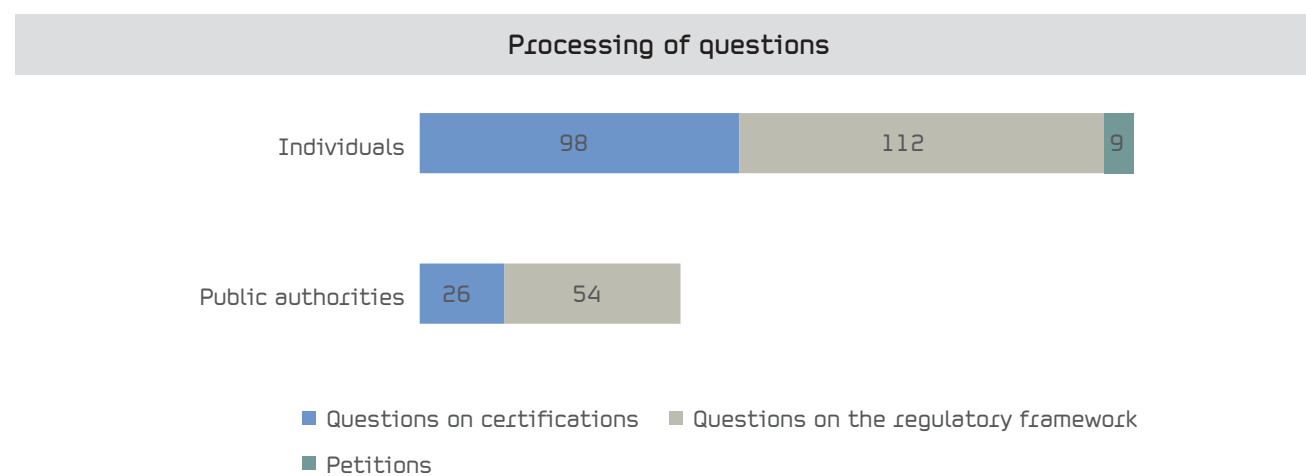
3.3.4 PROCESSING OF QUESTIONS ON THE OPERATION OF GAMES

In 2015 a total of two hundred and ninety-nine (299) questions were submitted, regarding the organization and operation of games, by both interested Individuals and Public Authorities for purposes within their field of competence. The following table shows the distribution of the processed questions, according to type and submission body.

	Public authorities	Individuals	Total
Questions on certifications	26	98	124
Questions on the regulatory framework	54	112	166
Petitions	-	9	9
Total	80	219	299

In a total of two hundred and ninety-nine (299) questions, two hundred and nineteen (219) were submitted by interested Individuals and eighty (80) by Public Authorities. Out of two hundred and nineteen (219) citizens' questions, ninety-eight (98) concerned certifications, one hundred and twelve (112) clarifications on the regulatory framework, while nine (9) of them were petitions.

All the above questions and requests were handled promptly and answered in full.



According to the applicable law, the HGC is the competent Authority for the monitoring and inspection of the gaming market, as well as of electronic amusement games. Indicatively, inspections intend to ensure the legality of games, compliance with the rules on gaming, compliance with the terms of gambling licenses, sound economic management, and due payment of winnings to players, to the State and to the beneficiary agencies.

It should be noted that inspections of any kind of game which is organized and operated without the license or/and certification that the law requires for the premises, the gaming machines and the games are conducted by the Hellenic Police Authorities [Law 4002/2011, article 52A].

The annual activity report in the field of compliance inspection procedures in the gaming market is presented per gaming operator group in conjunction with the respective game or game group they operate, as set out in the approved Action Plan 2013-2015. This section does not report on inspections concerning compliance with implementing measures to fight money laundering or issues regarding the implementation of commercial communication programs, given that these issues are analyzed in different sections of this report.

In 2015, the projects in this field were carried out by the Directorate of Audit and Compliance of Exclusive Rights Gaming Providers and the Directorate of Audit and Other Gaming Providers.

4.1 INSPECTION OF GAMING SERVICE PROVIDERS WITH NON EXCLUSIVE RIGHTS

4.1.1 COMPLIANCE INSPECTION PROCEDURES FOR ELECTRONIC AMUSEMENT GAMES

In 2015 the operation of electronic amusement games played on gaming machines was permitted, for the first time, only to operators holding the necessary Operating License, but the permission concerned only certified games installed on certified gaming machines operating in certified shops. Any operation of games that violates Decision No. 130/2/18.11.2014 (GG Series B, No. 3225) of the HGC, «Regulation of matters regarding the operation and compliance inspection of electronic amusement games played on gaming machines», as in force, leads to serious criminal and administrative sanctions.

In this framework, the HGC designed, developed and put into operation the “Information system for the management and inspection of the operation and certification of electronic amusement games played on gaming machines”, which allows interested parties to apply for the relevant license and certification. The deadline for the market to comply with the provisions of the decision was 28th February 2015.

Consequently, project 4.17 of the approved Action Plan 2013-2015 «Compliance inspection of amusement games played on gaming machines» was completed in the second half of 2015, when on-site and administrative inspections started. After the first round of inspections, warnings were

issued to the inspected operators and shops in order to achieve compliance with the applicable provisions.

The project is ongoing and is expected to be running as part of the Action Plan 2016-2018.

Finally, inspection of online amusement games (project 4.19 of the approved Action Plan 2013-2015) is not possible for the moment, given that the regulatory framework for the operation of these games has not been fully studied yet.

4.1.2 INSPECTIONS FOR TRACKING UNAUTHORIZED ONLINE GAMBLING PROVIDERS

Inspections for tracking unauthorized online gambling providers continued in 2015 (project 4.10 of the approved Action Plan 2013-2015); this process had already been launched by Decision No. 51/3/26.04.2013 (GG Series B, No. 1147) of the HGC.

The process involves regular inspection of the Internet to track websites that provide gambling services within the Greek territory. If it is confirmed that the gambling services provided are unauthorized, the websites are included in the black list kept by the HGC.

The list of unauthorized online gambling service providers (black list) has been kept and continuously updated since July 2013.

Additionally, from its 6th version (21/04/2015) onwards, the list of unauthorized online gambling service providers (black list) also includes all natural and/or legal persons that are reported to provide unauthorized services via the websites included in the list. The black list is published on the HGC website in a processable format and provides all the information that the competent authorities need to take the necessary action, but also to inform the public.

The following three (3) updated versions of the black list were issued and published in 2015:

- On 21st April 2015, the 6th version of the black list was published,
- On 24th April 2015, the 7th version of the black list was published,
- On 30th April 2015, the 8th edition of the black list was published.

All stakeholders are automatically notified of each updated version of the black list published by the HGC once it has been posted on its website. These are:

- Internet service providers (ISPs),
- the Hellenic Telecommunications and Post Commission (EETT), which is the Regulatory Authority for the ISPs,
- the Bank of Greece, which is the Regulatory Authority supervising credit and payment institutions, as well as
- the competent prosecuting and law enforcement authorities, so that they can take all the necessary actions that are laid down in the law.

The project 4.10 of the approved Action Plan 2013-2015 is ongoing and it is also included in the Action Plan 2016-2018, under the title «Inspections for tracking websites offering unauthorized online gambling services and drafting the respective black list». At the same time, the HGC is reviewing the black list in order to achieve the necessary improvements.

Moreover, as part of its online inspections, the HGC has extended the scope of its inspection activities under the Action Plan 2016-2018 to the «Inspection of Internet service providers (ISPs) to assess compliance with the requirements for denial of access to websites that provide unauthorized gambling services». These are inspections of ISPs whose registered office or centre of effective management or permanent establishment is in Greece, as laid down in the general provisions of Law 2238/1994, as in force, to establish whether the unauthorized gambling websites which are included in the relevant black list of the HGC are provided access through an IP located in the Greek territory.

4.1.3 COMPLIANCE INSPECTION OF CASINO GAMBLING

As regards compliance of casino enterprises with the financial obligations created by their gambling operations, the Greek State's share of the gross profit of casinos has been paid regularly and on a daily basis since 1st July 2014.

The money is deposited into an HGC account via web banking and then regularly paid, on a weekly basis, to the Greek State, following article 22 of Law 4255/2014 (GG Series A, No. 89), and Decision No. 111/2/24.06.2014 of the HGC. It should be noted that the HGC monitors and electronically crosschecks the financial data in real time via an electronic application that it has developed.

Following the same Decision, the HGC also checks the casinos as to whether they pay in time the relevant rights due to Local Authorities and other beneficiaries, as well as whether they meet their obligations for the settlement of older debts to the Greek State.

In 2015, following a study on data for casino gaming activities, the minimum gaming reserve that casinos hold as a safety measure, which is distinguished in the reserve for usual gaming activities and the reserve for progressive functions (jackpots), has been reassessed. Such issues were resolved with Decision No. 166/7/23.7.2015 (GG Series B, No. 1763) and Decision No. 166/8/23.7.2015 (GG Series B, No. 1662) of the HGC.

Throughout the year, casinos have been continuously inspected, on-site and on a daily basis, by inspection teams which consist of specifically authorized HGC officials, in accordance with the relevant Regulation.

In particular, in 2015, in the context of the above regular inspection, the HGC received and assessed approximately 3,160 Daily Bulletins on Inspection Findings, 108 monthly inspection reports and 180 inspection reports on the gaming reserve that casinos hold as a safety measure, and it drafted 800 monthly inspection plans. Moreover, the HGC realized approximately 900 monthly reports and validations of inspectors' travel expenses (after collecting all the necessary supporting documents for the payment of travel allowances), as well as validations of the hours worked at night or on bank holidays by the inspection teams.

Finally, the HGC also conducted special inspections whenever it was deemed necessary to verify compliance with specific issues or to deal with specific incidents. Most of these inspections related to the operation of casino enterprises in general, in accordance with the legal provisions applicable in each case, as well as the investigation of various incidents reported by the users of casino services.

In 2015, an administrative fine was imposed in one case, strict warnings were given in two cases and a declaratory act for the temporary cessation of operation was issued in one case.

The project is ongoing and is expected to be running as part of the Action Plan 2016-2018.

4.1.4 COMPLIANCE INSPECTION OF GAMBLING ON BROADCAST MEDIA

Project 4.16 of the approved Action Plan 2013-2015 «Inspection of gambling on broadcast media» is aimed at implementing inspection procedures that ensure the transparency and credibility of gambling on broadcast media, preventing the excessive participation of citizens in gambling and ensuring the protection of minors and other vulnerable groups.

In this context, the HGC, by order of the Prosecutor at the Court of First Instance of Athens, investigated two companies that operate games of chance on broadcast media and more specifically, on television. The inspection report which shows the results of the investigation was forwarded to the Pretrial Investigation Department of the Public Prosecutor's Office of Athens in order to take further action.

At the same time, the inspection findings allowed the HGC to propose to the Greek State a blanket ban on the operation of this category of games³⁹.

The project is ongoing and is expected to be running as part of the Action Plan 2016-2018

4.2 INSPECTION OF GAMING SERVICE PROVIDERS WITH EXCLUSIVE RIGHTS

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

The inspections that the HGC conducts in this field are only intended to establish key figures, such as the turnover and the payment of winnings, as well as the collection of the Greek State's share of gross gaming revenue, as according to paragraph 5, article 27 of Law 2843/2000 (GG Series A, No. 219), which remains in force, the inspection of the gaming operations of OPAP S.A., the declaration of winners and the judgment of appeals are carried out by the 15-member "Committee for Inspection, Declaration of Winners and Judgment of Appeals", as specified in the joint decision of the Minister of Finance and the Minister of Culture.

39. See paragraph 8.3

However, Decision No. 29157/2000 (GG Series B, No. 1417) on the establishment of this committee was abolished by paragraph 29, article 24 of Law 4141/2013 (GG Series A, No. 81). Having regard to the above points, the HGC recommended, by Decision No. 162/5/02.07.2015, the abolition of all provisions of paragraph 5, article 27 of Law 2843/2000 (GG Series A, No. 219)⁴⁰.

In this context, in 2015, the «Inspection of games of chance operated by OPAP S.A.» (project 4.11 of the approved Action Plan) was carried out according to schedule. Specifically, regular inspections of the system for the distribution of profits, the payment of winnings and of the Greek State's share of gross gaming revenue were conducted.

The inspection of the games operated by OPAP S.A. (project: 4.11 of the approved Action Plan 2013-2015) is ongoing and is expected to continue running as part of the Action Plan 2016-2018 as well.

4.2.2 COMPLIANCE INSPECTION OF GAMES OF CHANCE PLAYED ON GAMING MACHINES

The inspection of games of chance played on gaming machines (project: 4.15 of the approved Action Plan 2013-2015) was initially scheduled to start in the 2nd quarter of 2014, provided that the gaming machines would have been installed and operated by the operator (OPAP S.A.), but this timetable was revised and the project was rescheduled for the 2nd quarter of 2015.

However, the installation and operation of the gaming machines had not been completed until the time this report was drafted, i.e. the end of March 2016. As a matter of fact, the HGC has not yet received any time schedule of action from the operator in order to safely establish when inspections will start.

It should be noted that project 4.15 of the approved Action Plan 2013-2015 is scheduled to be running as part of the Action Plan 2016-2018, once OPAP S.A. has completed the installation and started the operation of the gaming machines.

4.2.3 COMPLIANCE INSPECTION OF GAMES OF CHANCE PLAYED ON GAMING MACHINES

As regards project 4.13 of the approved Action Plan 2013-2015, the following information is available:

The Regulation on the Operation of mutual betting on horse racing was published with Decision No. 171/14.8.2015 (GG Series B, No. 1708). Subsequently, by virtue of Law 4338/2015 (GG Series A, No. 131), the Hellenic Parliament ratified the concession agreement with «Hellas Horse Races S.A.» and by virtue of Law 4342/2015 (GG Series A, No. 143), para. 5, article 51, the Hellenic Parliament ratified the last condition precedent of the concession agreement.

Hellas Horse Races S.A. would officially undertake to start horse races on 10 December 2015, upon fulfillment of all provisions. This deadline was extended by the Greek State until the beginning of January of the following year.

Project 4.13 is ongoing and is expected to be running as part of the Action Plan 2016-2018 as well.

40. See paragraph 8.4

4.2.4 COMPLIANCE INSPECTION OF THE GAMES OPERATED BY HELLENIC LOTTERIES S.A.

The project «Inspection of games of chance operated by HELLENIC LOTTERIES S.A.» (project 4.12 of the approved Action Plan) is carried out according to schedule. In this context, regular periodic inspections are conducted for each State Lottery game, regarding the payment of winnings and the Greek State's share of gross gaming revenue.

Additionally, in 2015 on-site inspections of specific procedures followed by the Operator were conducted, as well as special inspections regarding the issue and reissue of the Instant Lottery game (SCRATCH). As a result of these inspections the HGC issued warnings to the Operator.

The project «Inspection of games of chance operated by HELLENIC LOTTERIES S.A.» is ongoing and is included in the new Action Plan of the HGC for the period 2016-2018.

4.3 PLANNING, ORGANIZATION AND TOOLS TO SUPPORT INSPECTIONS

Given that the gaming market and the environment in which it evolves is constantly changing, the basic aim of the HGC is to have a modern inspection mechanism which can timely and effectively respond to new challenges and, at the same time, ensure transparency at all phases of the inspection.

Therefore, a complete inspection system is required in order to conduct effective and valid inspections of gaming operators, games and gaming venues.

This system will use all the available tools so as to determine the inspection needs, prioritize them, record the findings and the results of inspections in a concrete way, optimize the available human and material resources and, last but not least, constantly improve the procedures.

In light of the above, in 2015, the HGC:

- Completed and put into force the Regulation on Gaming Inspection.
- Set up a Gaming Inspectors' Register.
- Drafted Inspection Manuals to be used in various inspection fields.
- Developed supportive tools to manage inspections.

As part of the Action Plan 2016-2018 the HGC plans to further extend its activities for the continuous improvement of inspection procedures.

The following sections provide a detailed presentation of the above points.

4.3.1 REGULATION ON THE GENERAL PRINCIPLES OF INSPECTION

Given that compliance inspection of the gambling market has many general characteristics which are common regardless of the provider or the type of game, it is necessary to standardize and harmonize inspection actions in order to ensure that common rules and procedures are followed, regardless of the inspection body.

This is the main objective of the «Regulation on the General Principles of Inspection» (project 4.20 of the approved Action Plan 2013-2015) which has been completed. The Regulation was approved

and entered into force by virtue of Decision No. 168/6/30.07.2015 (GG Series B, No. 1959) of the HGC.

This project sets the general principles of the inspection procedure, which are a tool to achieve, among other things, a proper definition and prioritization of inspection needs, the implementation of a specific methodology to ensure the independence and impartiality of inspection bodies, data and information confidentiality, accuracy and clarity of inspection findings and results, an effective management of materials and human resources, continuous improvement of inspection procedures, etc.

This decision also defines the objective of compliance inspection as the effort to ascertain that the inspected operators comply with the applicable regulatory framework for games and stipulates that compliance inspection mainly aims at confirming compliance with a) the licensing terms of the concession agreements signed with the Greek State, b) the legislative and other statutory provisions for the organization and operation of games, c) the guidelines and recommendations approved by decision of the HGC, d) the clauses on the payment of winnings and of the Greek State's and the HGC's share, as laid down in the applicable law.

Specifically, it determines the methodology of Compliance Inspection. The compliance inspection procedure starts by identifying, assessing and prioritizing the risks in all areas, fields, categories, systems, operations or/and activities related to the organization and operation of games. Then, the plan of regular inspections is drafted based on the results of the above evaluation and by applying special parameters and criteria (such as frequency, geographical dispersion, available materials, human resources, etc.). The next phase of the procedure consists in carrying out planned regular inspections, as well as special inspections, by applying all the necessary compliance inspection processes. The compliance inspection procedure is concluded with an assessment of the inspection results and continuous improvement of the inspection methodology.

4.3.2 SETTING UP A GAMING INSPECTORS' REGISTER

The processes used for compliance inspection and the officials that will be assigned with the inspections should be equipped with a wide number of tools, qualifications and specialized knowledge for their successful conduct.

In this respect and within the scope of its responsibilities as the competent authority for the supervision and control of all gaming in the Greek territory, the HGC has taken all the necessary steps in order to set up a Gaming Inspectors' Register, according to article 18, Law 3229/2004 (GG Series A, No.38), as replaced with paragraph 2, article 23, Law 4141/2013 (GG Series A, No. 81) and in force.

Specifically, Decision No. 168/6/30.7.2015 (GG Series B No. 1959) of the HGC, titled: «Approval of issues relevant to the Regulation of Gaming Inspection and the operation of the Gaming Inspectors' Register» sets the terms and conditions and the necessary procedures for setting up the Gaming Inspectors' Register and managing, training and evaluating inspectors.

More specifically, the decision determines which conditions need to be fulfilled by the staff that

will be included in the Gaming Inspectors' Register. According to the procedure and the conditions described in articles 12 and 13, chapter B of the decision, they are mainly required to have a university degree, knowledge of a foreign language, and information technology and Internet skills.

This decision also provides for the continuous education and training of the officials included in the Gaming Inspectors' Register, the evaluation of their performance, as well as their obligations and the conditions of their removal from the Register.

As a result, the HGC took the steps required for the selection of candidates for the Gaming Inspectors' Register. The HGC initially turned to its own employees, given that, at this point, the existing personnel has the necessary know-how for the Greek gambling market.

Finally, once the relevant procedures had been completed, the Gaming Inspectors' Register was set up by Decision No. 192/4/14.01.2016 of the HGC. It should be noted that the existing teams for on-site administrative inspections and supervision of casinos were also included in the register.

4.3.3 INSPECTION MANUALS

Inspection manuals are yet another instrument for standardizing the basic actions that have to be carried out by the authorized officers of the Commission who will participate in the inspection teams during all stages of the inspection procedure, thus contributing to the completeness, reliability and accuracy of the inspections.

These manuals are specialized according to the type of game, the number and dispersion of inspected persons and entities, the size of the gaming service provider, etc., so as to serve as a guide for the inspectors as to the inspection points, the stages, the inspection method, the documentation and the method of recording results.

In this context, the following compliance inspection manuals were completed: project 4.1 of the approved Action Plan 2013-2015 titled: «Manual on compliance inspection procedures for electronic amusement games played on gaming machines», project 4.3 of the approved Action Plan 2013-2015 titled: «Manual on compliance inspection procedures for games of chance played on gaming machines», project 4.8 of the approved Action Plan 2013-2015 titled: «Drafting a Manual on Compliance Inspection Procedures for Commercial Communication», as well as project 4.23 of the approved Action Plan 2013-2015 titled: «Drafting a manual on compliance inspection procedures for lotteries».

Projects 4.4, 4.5, 4.21, 4.22 are at the stage of completion, as well as drafting manuals on compliance inspection procedures for online gambling (tracking of unauthorized websites and including them in the black list) and for casinos, given the fact that inspection procedures are fully covered by the existing statutory provisions. The HGC has included the completion of these projects in the Action Plan 2016-2018.

It should be noted that drafting manuals is a dynamic process, which consists in the manuals being continuously updated, so as to include possible amendments of the regulatory framework, as well as improvements that are based on feedback from the inspections.

4.3.4 REGISTRIES AND DATABASES

The HGC keeps registries and databases that include analytical data necessary for the inspections, and makes sure that they are continuously improved and specified. In this context, the following projects were extended and updated: «Creation of a data center», «Development of an IT system to support processes, licensing, certification and compliance inspection and to monitor the relevant registers» and «Development of an IT system for supervision and compliance inspection (ITSCI)» (projects: 7.11, 7.12 and 7.15 of the approved Action Plan 2013-2015 respectively).

Moreover, various applications that monitor the correct operation of State Lotteries have been developed in order to better organize the inspection procedure: a) an application to monitor «Laiko» Lottery, b) an application to monitor «Ethniko» Lottery and c) an application to monitor SCRATCH. Specifically, these applications have been developed in order to allow the administrative monitoring/validation of data relevant to the operation of games and data from the monthly declarations on the payment of the Greek State's share of gross gaming revenue.

In addition, a data recording and reporting application for State Lotteries was developed (dynamic web based database .ftp), project 4.26 of the approved Action Plan, titled «Development of a data recording and reporting mechanism for State Lotteries», in order to record data relevant to the operation of games, such as sales, payments, cancellations etc. and data concerning the general management of State Lotteries, i.e. the sales network, complaints etc. Hellenic Lotteries S.A. is responsible for feeding the primary data from the reports into the database on a daily, weekly and quarterly basis. The data and reports generated by the mechanism developed by the HGC are used for monitoring and supervising State Lotteries and they constitute the basis for specific administrative inspections.

All the above applications and databases have been developed by the Information and Technology Directorate of the HGC.

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

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

5.1 ACTIONS FOR THE PREVENTION AND CONTROL OF PROBLEM GAMBLING

In 2015, the work of the HGC in the field of prevention and control of problem gambling included the following actions:

5.1.1 PREVALENCE STUDY FOR GREECE

The project (project: 5.1 of the approved Action Plan 2013-2015) includes a country-wide prevalence study carried out in Greece under the title «Problem Gambling Prevalence Study».

The HGC proposed a draft methodology for the above study by adopting the best practices that came out from the evaluation of prevalence studies on problem gambling in other countries, with an emphasis on the British model, the analysis of methodological approaches and the investigation of the most frequently used tools internationally, after having evaluated them in relation to the targeted result and the Greek reality.

After updating and enriching the technical requirements of the project with new research questions, the HGC started and completed the drafting of technical requirements, such as the documents for the specifications of the bidders and the compliance tables included in the call for tenders for the selection of a contractor to implement the project. The call for tenders will be conducted in 2016.

5.1.2 STUDY ON THE MEASUREMENT AND EVALUATION OF THE POTENTIAL RISKS OF GAMBLING

The HGC began a study titled: «Measurement and evaluation of the potential risks of gambling» (project: 5.11 of the approved Action Plan 2013-2015) with the use of the tool «AsTERiG – Assessment Tool to Measure and Evaluate the Risk Potential of Gambling Products».

The objective of the study is to measure and evaluate each game type to determine how addictive gambling can be, in order to propose policies for the protection of the public by minimizing the negative effects of problem gambling. The part of the study that addresses casino gambling has already been completed. The study is expected to be completed within 2016.

5.1.3 SYNERGIES WITH OTHER BODIES FOR THE PROTECTION OF THE PUBLIC AND CONTROL OF ADDICTION

Under the project «Synergies with other bodies for the protection of the public and control of addiction» (project: 5.4 of the approved Action Plan 2013-2015), the HGC systematically and constructively approaches and cooperates with specialized bodies. In 2015 the following actions were implemented:

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

The HGC continued its partnership with the Therapy Center for Dependent Individuals (KETHEA). The program of KETHEA titled «ALPHA» offers counseling sessions to addicted players under the guidance of a psychology specialist so as to enable them to overcome their addiction and to prevent their relapse. With this partnership the HGC aims at acquiring experience and know-how so that it fulfills its commitment to implement actions for the prevention and control of problem gambling.

b. Partnership with Gamblers Anonymous

The HGC continued its cooperation with Gamblers Anonymous Greece, which represents Gamblers Anonymous L.A. - U.S.A. in Greece. Its recovery program of «twelve steps» is addressed to people with gambling and alcohol problems. With this cooperation the HGC aims at acquiring experience and know-how so that it fulfills its commitment to implement actions for the prevention and control of problem gambling.

The project is ongoing and is expected to be running as part of the Action Plan 2016-2018 as well.

5.2 ACTIONS TO RAISE PUBLIC AWARENESS AND PROMOTE RESPONSIBLE GAMING

Responsible Gambling is the total of regulations and provisions aiming at limiting the negative effects of overexposure, as well as helping gamblers to make responsible and conscious decisions. Responsible Gambling consists of actions aiming at the protection of gamblers and the public at large from possible damage and, generally, from the negative effects of excessive gambling. Emphasis is given particularly to minors and vulnerable groups.

In the context of raising public awareness and promoting responsible gambling, the following actions were implemented in 2015:

5.2.1 PRINCIPLES OF RESPONSIBLE GAMBLING

The HGC published Decision No. 163/5/9.7.2015 (GG Series B, No. 1788) titled: «Principles of Responsible Gambling» (project: 5.3 of the approved Action Plan 2013-2015) aiming at ensuring that all gambling activities are performed in a socially responsible manner in order to minimize negative effects from irresponsible gambling. This aim is reached mainly through:

- The commitment for social responsibility and empathy of all stakeholders in the gaming market.
- Moderate and rational commercial communication according to law and to the decisions and guidelines of the HGC.
- Honest and fair gaming in the framework of law and of the decisions of the HGC.
- The creation and maintenance of a safe and supportive environment for the provision of gambling products and services.

e. Procedures set up by the operators to protect vulnerable groups and exclude minors from gambling.

The Principles of Responsible Gambling govern all games of chance. They apply to license holders, gambling operators, providers, players, telephone and Internet service providers (ISPs), advertisers and all stakeholders in the gambling market.

5.2.2 DEVELOPMENT OF WEB-BASED AUDIOVISUAL MATERIAL FOR THE HGC WEBSITE

The HGC created a special section on its website (www.gamingcommission.gov.gr), titled e-AsSOS. The platform includes tools and applications to inform the public and raise public awareness and to develop the skill of self-protection in gamblers, so that gambling remains entertaining and does not become a source of problems. In particular the following actions were performed in 2015:

a. Development of an online interactive application titled «Find your way»

The web based information application titled «Find your way» (project: 5.7 of the approved Action Plan 2013-2015) was planned and implemented in the form of an interactive game aiming at informing players on the principles of responsible gambling. The application was uploaded in the section «RESPONSIBLE GAMBLING - e-AsSOS platform» of the HGC website.

This interactive application was adapted for high school students, as part of the educational-preventive actions that the HGC has planned for the protection of minors.

b. Development of an interactive education tool titled «all roads lead to knowledge».

The development of the web based application titled: «all roads lead to knowledge» started in 2015 (project: 5.13 of the approved Action Plan 2013-2015). It has the form of an interactive game aiming at informing the public so that they adopt a healthy attitude towards gambling. The application rests on the principle that knowledge is power; therefore, it is a game testing one's knowledge of games of chance. In an entertaining way, the application aims at raising public awareness and helping people refute their false perceptions of gambling. The game consists of three fields: history, mathematics and ethics with regard to gambling (responsible gambling). The application is expected to be completed in 2016 when it will be uploaded on the RESPONSIBLE GAMBLING - e-AsSOS platform on the HGC website.

c. Development of an interactive application titled «Prodromos the Gaming Machine»

Similarly, the development of the application titled «Prodromos the Gaming Machine» (project: 5.14 of the approved Action Plan 2013-2015), an interactive game aiming at promoting responsible gambling, began in 2015. Prodromos is a man-like Video Lottery Terminal (VLT) gaming machine, which informs in an entertaining way while it directs the public towards a more responsible and conscious attitude towards gambling. The application is expected to be completed in 2016 and uploaded on the RESPONSIBLE GAMBLING - e-AsSOS platform on the HGC website.

The projects are ongoing and are expected to be running as part of the new Action Plan 2016-2018.

5.3 ACTIONS TO EDUCATE AND PROTECT THE PUBLIC AND VULNERABLE GROUPS

The HGC is steadily oriented towards rational gambling among adults and the protection of vulnerable groups, especially of minors. In this context, the HGC continuously plans and implements thematic educational actions (project: 5.6 of the approved Action Plan 2013-2015). In 2015 the following actions were implemented:

5.3.1 DEVELOPMENT OF HEALTH EDUCATION PROGRAM FOR THE PROTECTION OF TEENAGERS FROM THE INFLUENCE OF COMMERCIAL COMMUNICATION ON GAMBLING

The HGC began the development of a Health Education Program titled «Prevention and education of teenagers with regard to the risks of gambling advertising: **SPOT IT!**» and it has completed the relevant educational material. The program addresses high school students and aims at raising awareness of the specific age group which is at a transitional stage between adolescence and adulthood in relation to gambling. Specifically, it is a program for the protection of this age group from the influence of commercial communication on gambling and aims at creating a critical attitude and a strong defense against a barrage of gambling advertisements.

The project is ongoing and is expected to be running, via new partial actions, as part of the Action Plan 2016-2018 as well.

5.4 OTHER STUDIES AND RESEARCH FOR THE PROTECTION OF THE PUBLIC AND OF VULNERABLE GROUPS

The work done by the HGC in this field in 2015 includes the following actions:

5.4.1 STUDY ON THE MAPPING AND INVESTIGATION OF ILLEGAL GAMBLING IN GREECE

The project (project: 5.16 of the approved Action Plan 2013-2015) includes a country-wide study carried out in Greece under the title «Study on the mapping and investigation of illegal gambling in Greece» and it is carried out by the Directorate of Planning and Research. The study investigates the gambling behavior of consumers in connection with illegal gambling and tries to find out the profile, the degree and the frequency of participation of gamblers in illegal games per type of game and illegal gambling venue.

The HGC reviewed the international and Greek literature on illegal gambling, evaluated the best practices that emerged from this review and analyzed the most suitable methodological approaches. The HGC conducted working meetings with scientific bodies in the field of social research in order to define the individual research fields and the methodology of the project. Then, the HGC proposed a draft methodology for studying the gambling behavior of consumers in connection with illegal gambling, and defined the research objectives and the research hypotheses.

The HGC plans to include the research issues of the study on illegal gambling in the problem

gambling prevalence study (project: 5.1 of the approved Action Plan) since both studies are based on the collection of primary quantitative data on the behavior of consumers that use legal or illegal gambling networks and can, therefore, be conducted on the same sample population. Then, a separate specialized analysis of the primary quantitative data may follow, depending on the needs of each study. The HGC is working in this direction with a view to save an important amount of costs.

5.4.2 STUDY ON AGE RATING FOR ELECTRONIC AMUSEMENT GAMES

THE HGC following Decision No. 130/2/18.11.2014 (GG Series B, No. 3225) titled «Regulation of matters regarding the operation and compliance inspection of electronic amusement games played on gaming machines», as in force, sets as a prerequisite for the certification of electronic amusement games to bear an age rating label according to the Pan-European Game Information – “PEGI” system.

In case the game does not have an authorized age rating label, its content should have been inspected by the manufacturer, the importer or any other person who legally owns or operates the game with regard to the descriptive elements it contains (such as violence, bad language, sex, discrimination, drug use etc.).

This study was planned (project: 5.10 of the approved Action Plan 2013-2015) for those games that do not have an age rating labeling authorization. The study is at the stage of collecting and utilizing the data taken from the international practice and literature in combination with quantitative and qualitative data taken from the relevant certification applications submitted to the HGC.

Research has shown that the age rating system of PEGI developed by the Interactive Software Federation of Europe (ISFE) is used in more than thirty (30) European countries and is supported by large industries.

6.1 DRAFTING A REGULATION ON COMMERCIAL COMMUNICATION

The project «Drafting a Regulation on Commercial Communication» (project: 1.12 of the approved Action Plan 2013-2015) is aimed at adopting and implementing a framework of principles for responsible advertising, so as to minimize the negative effects that the commercial communication activities of gambling service providers may have on the public, especially on vulnerable social groups, as a result of their participation in gambling.

Decision No. 106/2/23.5.2014 (GG Series B No. 1368) of the HGC, titled: «Regulation of matters relating to commercial communication in gambling» as amended and codified by its Decision No. 108/2/6.6.2014 (GG Series B, No. 1727) and Decision No. 127/4/23.10.2014 (GG Series B, No. 3125) provided the gambling service providers with a framework of principles which has to apply to the design, production, distribution, promotion and advertisement of gambling operations and, in general, to anything that comes under the heading of Commercial Communication.

According to the Regulation, the providers are obliged to submit to the HGC the commercial communication plans they have drafted for the games they operate and should not proceed to implement the plan before obtaining the necessary approval.

Then, the need to complete and further specify the above framework, so as to ensure, on the one hand, social order and protection of the public, particularly minors and vulnerable groups, from addiction and waste of assets, and to achieve, on the other hand, the best possible compatibility of the regulatory framework with the actual market, has led to the issuance of a new decision of the HGC with No. 163/4C/09.07.2015 (GG Series B, No. 1824) and with the same title: «Regulation of matters relating to commercial communication in gambling».

The last decision of the HGC, among other things:

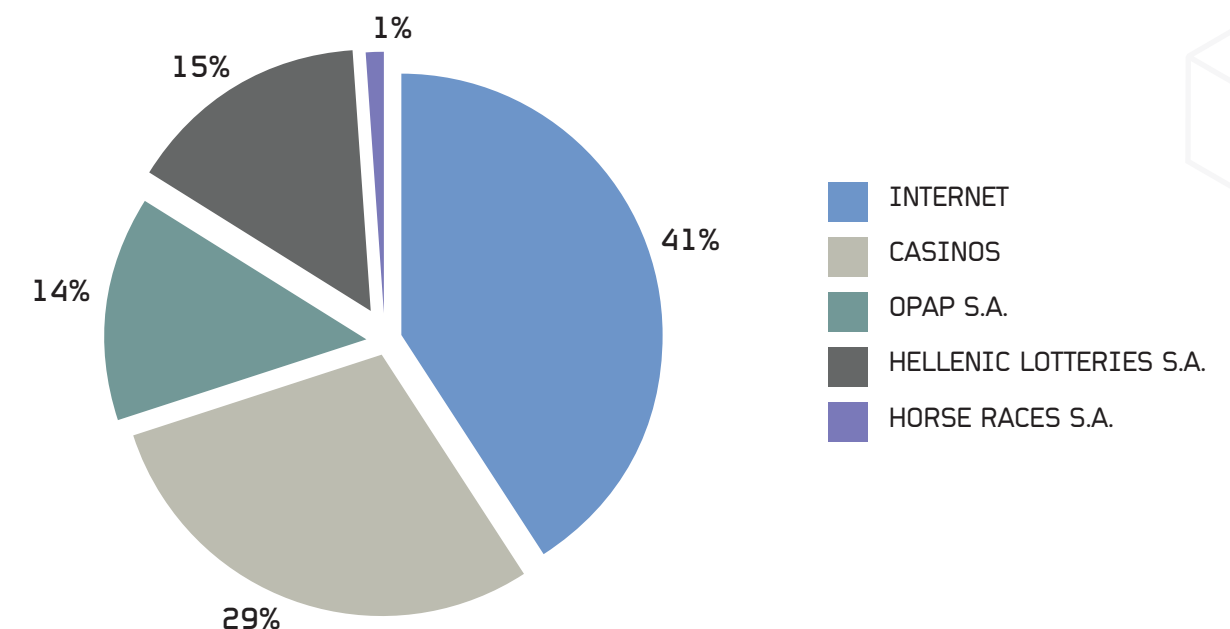
- Establishes the obligation of operators to submit to the HGC the commercial communication plans they have drafted for approval before they proceed to their implementation (Article 8).
- Introduces special provisions for the protection of minors (Article 4).
- Regulates commercial announcements in the framework of Sponsorship programs (Article 5).
- Regulates issues of commercial announcements relevant to programs of Corporate Responsibility (Article 6).
- Establishes the obligation of providers to submit commercial communication plans according to the standard guide issued by the HGC. (Article 8, paragraph 8.2.1).
- Defines issues relevant to administrative sanctions in case of violation of the decision (Articles 13 and 14).

The above Regulation was amended by Decision No. 184/3/12.11.2015 (GG Series B, No. 2487) of the HGC, in order to improve the regulatory framework for the issues related to commercial communication that are included in the Regulation, so that it can serve the principles of legality of the administration, proportionality of the measures to the pursued objectives, good

administration, tolerance towards the citizen and legitimate expectation.

A total of two hundred and fifteen (215) gambling service providers submitted their commercial communication plans for approval between 1st January and 31st December 2015, out of which eighty-nine (89) plans are from companies providing online gambling services that are subject to the transitional regime of paragraph 12, article 50 of Law 4002/2011 (GG Series A, No. 180), sixty-three (63) come from casinos, twenty-nine (29) from OPAP S.A., thirty-three (33) from Hellenic Lotteries S.A. and one (1) from Hellas Horse Races S.A. The percentage distribution of requests for approval of Commercial Communication Plans per gambling service provider is shown in the chart.

Percentage distribution of requests for approval of Commercial Communication Plans per provider



From all the commercial communication plans assessed, one hundred and two (102) were approved, eighty six (86) were rejected and twenty-seven (27) are still pending, as some additional information is needed or/and they have to be amended in accordance with the remarks of the HGC.

In order to facilitate the submission and approval of commercial communication plans, the HGC has issued a standard guide, according to article 8, para. 8.2.1 of the above Regulation and according to its Decision No. 177/3/01.10.2015, which is available on its website and provides assistance in drafting and submitting the plans. Besides, several meetings were held with representatives of the gambling service providers in order to provide clarifications on the Regulation and the submission procedure.

Finally, in the context of continuous training of the HGC officials (project: 5.15 of the approved Action Plan 2013-2015) the HGC designed training material in order to organize information workshops for the HGC employees that are included in the Gaming Inspections' Register. The workshops aim at training officials on matters relating to the new Regulation of Commercial Communication issued by Decision No. 163/4C/9.7.2015 (B 1824) of the HGC, as in force. The workshops were conducted in January 2016.

The above project in the field of commercial communication of gambling service providers was carried out by the Directorate of Regulation and Social Responsibility.

6.2 COMPLIANCE INSPECTION OF COMMERCIAL COMMUNICATION OF GAMBLING SERVICE PROVIDERS

Project 4.18 «Inspection of compliance with the rules on commercial communication» concerns the inspection of the commercial communication used by gambling service providers so as to ensure the rational use of commercial communication, to promote Responsible Gaming and to direct consumers towards legal gaming networks.

The discrepancies between the implemented commercial communication and the approved plans identified during compliance inspection were:

- non compliance of gambling service providers with the obligation to submit their Commercial Communication plan for approval to the HGC, as well as
- Implementation and promotion of Commercial Communication without prior approval of the HGC.

The results of the inspection led to administrative sanctions in four cases, while the decision on penalties is still pending in two more cases.

The project is ongoing and is expected to be running as part of the Action Plan 2016-2018 as well.

According to Law 3691/2008 (GG Series A, No. 166) “Prevention and suppression of money laundering and terrorist financing and other provisions”, as amended by Law 3932/2011 (GG Series A, No. 49) and in force, the HGC is the competent Authority for the prevention of money laundering and terrorist financing in the gambling market and for the imposition of disciplinary and administrative penalties in case of breach of the obligations deriving from the applicable law.

The project in this field was carried out in 2015 by the AML Office.

In the scope of these competencies, the HGC performed the following actions:

7.1 IMPLEMENTATION OF THE REGULATION ON THE FIGHT AGAINST MONEY LAUNDERING AND TERRORIST FINANCING BY OBLIGATED PARTIES IN THE GAMBLING SERVICES MARKET

The project «Regulation on the implementation of measures to fight money laundering and terrorist financing by Obligated Parties in the gambling services market» (project: 1.20 of the approved Action Plan 2013-2015) was completed in 2014. The Regulation specifying the implementation of the provisions of Law 3691/2008 (GG Series A, No. 166), as in force, was approved and came into force by HGC Decision No. 129/2/07.11.2014 (GG Series B, No. 3162).

The above mentioned Regulation defines the Obligated Parties, their obligations, due diligence measures and administrative sanctions imposed in cases of violation of the applicable legal and regulatory framework. Obligated Parties are defined as all parties lawfully organizing or operating games of chance in the Greek territory, including any entities that make up their physical (land-based) network and excluding casinos, for which a specific separate decision is to be issued in 2016.

For the implementation of the Regulation, the HGC mapped the market as to the degree of compliance of Obligated Parties, found gaps in their compliance and informed the Obligated Parties on their obligations, providing them with the necessary help so that they achieve full compliance. A comprehensive approach was followed for the inspection of the Obligated Parties' compliance with the Regulation, with the creation and compilation of information material concerning all the stages of the gaming procedure, from the start, with the declaration of intention by the potential player, until the game is over and a certificate of winnings is granted.

The HGC notified in writing the websites through which the Obligated Parties monitor the lists of persons subject to restrictive measures. The lists are issued on the basis of the relevant Regulations of the European Union and the Decisions of the UN Security Council.

During the initial stage of implementation of the Regulation, the HGC chose to provide assistance and support to the Obligated Parties and make use of their cooperation and continuous dialogue so as to identify any problems arising from the implementation of the Regulation.

7.2 DATA COLLECTION AND EVALUATION

As part of the data collection and evaluation process, the HGC drew up a precise inventory of the situation with regard to the compliance of Obligated Parties with the Regulation and with Law 3691/2008, as in force. In this context, the following actions were implemented in 2015:

- a. All Obligated Parties were notified of their obligations of compliance with the Regulation. The HGC's priority was that all Obligated Parties appoint a Compliance Officer.
- b. An administrative control was conducted for the degree of compliance of the Obligated Parties with the provisions of paragraph 3.2, article 3 and paragraphs 4.2 and 4.3 of the HGC Decision No. 129/2/7.11.2014 (GG Series B, No. 3162) on the obligation of appointing a Compliance Officer.
- c. In cases of deficiencies or gaps in compliance, the HGC offered the necessary assistance so that the Obligated Parties achieve full compliance.
- d. In cooperation with the competent Authorities, the HGC requested and collected data on the means of payment used by the Obligated Parties to pay shares and winnings to players (the unique accounts of players), on the place of payment, and on all the relevant certificates of winnings.
- e. In cooperation with the Anti-Money Laundering and Counter-Terrorist Financing Authority (article 7, Law 3691/2007) and other competent Authorities, the HGC collected statistical data on the geographical and age distribution of the inspected persons and the type of game under inspection.
- f. Aiming at supporting the HGC inspections, with regard to the specialization of the administrative penalties and fines of article 52, Law 3691/2008, as in force, the following tasks were performed as regards compliance of the Obligated Parties:
 - Recording of infringements (inspection points)
 - Definition of the criteria and the methodology used to estimate the gravity of infringements and to calculate fines.
 - Definition of the importance of an infringement based on four criteria:
 - i) the Protection of Public Interest
 - ii) the Protection of Social Interest
 - iii) the Prevention of money laundering and terrorist financing or the risk thereof, and
 - iv) the Compliance with the regulatory provisions (number of individual obligations having been violated).

7.3 COOPERATION WITH COMPETENT BODIES, LAW ENFORCEMENT AND PROSECUTING AUTHORITIES

The HGC cooperated on a case-by-case basis with the competent police and law-enforcement services, authorities and bodies in Greece, in order to retrieve and transmit information, it collected, processed, analyzed, evaluated and compiled crime-related information, data and complaints about crimes committed through the gaming industry and it cooperated with the equivalent departments of foreign authorities or international organizations to exchange experience and know-how.

To this purpose, in 2015 the HGC cooperated with the following bodies in Greece:

- the Ministry of Finance
- the Ministry of Citizen Protection
- the General Secretariat of Information Systems (GGPS)
- the Anti-Money Laundering and Counter-Terrorist Financing Authority (Authority established by article 7 of Law 3691/2008).

In 2015, the HGC fostered close cooperation in the field of information exchange on topics relevant to combating money laundering with foreign Authorities and international organizations, such as:

- The FATF (Inter-governmental body developing and promoting policies to combat money laundering and terrorist financing).
- The FIOD, the Dutch Authority for Combating Money Laundering.

Finally, the HGC participated in the consultation for the revision of the 3rd Directive on fighting money laundering and terrorist financing and submitted proposals to the European Commission. After the consultation was completed, Directive No. 2015/849 of the European Parliament and of the Council, the fourth Directive relevant to this field, was issued on 20th May 2015. Moreover, the HGC participates in the law-making committee formed by Decision of the Minister of Finance for the transposition of the above Directive into the Greek Law.

7.4 PARTICIPATION OF THE HGC IN A WORKSHOP MEETING ON FIGHTING MONEY LAUNDERING AND TERRORISM IN BRUSSELS

The President and the officials of the HGC participated in the 2nd Transposition Workshop Meeting – 4th Directive On The Prevention Of Money Laundering and Terrorist Financing (2015/849), which took place on 27th November 2015 in Brussels.

According to the applicable provisions⁴¹ defining the scope of its operation and its competencies, the HGC, among other things:

- Collects, studies and processes data on state revenue from the operation of games of chance.
- It studies and evaluates the existing statutory framework for the operation of games of chance, the inspection mechanisms for their control and the protection of the financial interests of the State.
- It recommends measures to improve the existing institutional framework for the protection of the interests of the State and the players.

In 2015, in the scope of these competencies, the HGC submitted recommendations to the State on the following issues:

8.1 RECOMMENDATION ON THE OPTIMIZATION OF THE PUBLIC REVENUE COLLECTION PROCESS

According to paragraph 5, article 50 of Law 4002/2011 (GG Series A, No. 180), as in force, the Greek State's share of gambling revenue is paid to the State every three months. The HGC, taking also into consideration the terms of the relevant concession agreements and in order to protect public interest, issued Decision No. 162/4/02.07.2015 recommending the amendment of paragraph 5, article 50 of Law 4002/2011 (GG Series A, No. 180). According to the recommendation, (a) the State's share is paid on the working day following the final outcome of each betting event or lottery game round or on the day of gaming on VLT gaming machines and (b) the uncommitted amounts of gambling winnings are paid to the Greek State monthly, within 28 days from the end of the month in which they were won.

8.2 RECOMMENDATION ON THE IMPLEMENTATION OF RESTRICTIVE PROVISIONS IN CASINO GAMING

Law 2206/1994 (GG Series A, No. 62), as in force, creates a strict legal framework of firm state control on the establishment, organization and operation of casinos. Moreover, according to the explanatory report of Law 2206/1994, the aim of the provisions regulating casinos is to protect the public from the risks posed by their operation. Another similar limitation, which is dictated by reasons of public and social interest, is also the payment of an entrance fee by the customers entering the gambling areas of casinos. Item 9, subparagraph 7, article 1 of Law 4093/2012 (GG Series A, No. 222) led to the adoption of a single entrance fee of 6 euros for all casinos.

By virtue of paragraphs 6, 7 of Decision No. 128269/1226/0015/POL.1292/ 16.11.1995 (GG Series B, No. 982) of the Minister of Finance, the purpose of the law, which is to discourage the participation

of citizens, especially low-income classes, in gambling and make gambling less attractive to customers, is compromised. Also, paragraph 8 of the decision cancels the dissuasive character of the entrance fee since, by virtue of the specific paragraph, financial incentives in the form of a discount are provided to those interested to visit casinos more frequently.

The HGC, takes into consideration the restrictive role that the State wishes to play in relation to gambling, which focuses on safeguarding social interest and protecting the public by discouraging the use of means and activities that promote the active participation of consumers in gambling, and not on the maximization of profit against public interest. Therefore, Decision No. 158/1/05.06.2015 of the HGC recommends that Decision No. 128269/1226/0015/POL.1292/ 16.11.1995 (GG Series B, No. 982) of the Minister of Finance is abolished, the decision provided in the last section of item 9, subparagraph E.7, article 1 of Law 4093/2012 (GG Series A, No. 222) is issued, and that the terms of commercial communication, as provided for in Decision No. 108/2/6.6.2014 (B 1727) of the HGC, are reexamined and completed in order to avoid offering an indirect premium for the entrance fee and, thus, indirectly advertise and promote gambling.

8.3 RECOMMENDATION ON THE PROHIBITION OF THE OPERATION AND BROADCASTING OF GAMES OF CHANCE ON BROADCAST MEDIA

Decision No. 93/2/28.01.2014 (GG Series B No. 205) of the HGC, titled: «General Principles and Rules For Gambling on Broadcast and Telecommunications Media, according to article 53, paragraph 6 of Law 4002/2011 (GG Series A, No. 180), as in force» allowed the operation of the above games of chance for a transitional period until the Regulation is issued and licenses are granted, on condition that a Declaration of Acceptance of the terms of the above decision is submitted to the HGC by the providers.

The HGC, takes into consideration the restrictive role that the State wishes to play in relation to gambling, which focuses on safeguarding social interest and protecting the public by discouraging the use of means and activities that promote the active participation of consumers in gambling, and not on the maximization of profit against public interest. Considering the very high penetration of broadcast and telecommunication media and their capacity to massively address the audience, the possibility of anonymous participation and the occurrence of serious compliance issues in the games operated during the transitional period, the HGC issued Decision No. 158/3/05.06.2015, recommending to the Greek State a blanket ban on the operation and broadcasting of these games, by abolition of article 53 of Law 4002/2011 (GG Series A, No.180), as well as of any other provision relevant to this article, in order to protect human dignity and to prevent the exploitation of the need and of the lack of experience of minors and vulnerable groups, as well as of the public and the consumers in general. The HGC had made a similar recommendation to the State in 2014, by its Decision No. 124/2/29.09.2014.

41. Article 17 of Law 3229/2004 (GG Series A, No. 38), items d, e and g.

8.4 RECOMMENDATION ON THE RATIONALIZATION OF OPAP S.A. INSPECTION BODIES AND ON REGULATION OF ISSUES RELEVANT TO THE INSPECTORS' REGISTER

Paragraph 5, article 27 of Law 2843/2000 (GG Series A, No. 219) provides for the creation of a Committee for Inspection, Declaration of Winners and Judgment of Appeals for all the games operated by OPAP S.A. Based on this enabling provision, administrative regulations and administrative deeds were issued that set up the Committee, which consists of fifteen (15) members and an equal number of substitute members, the mandate of whom is three (3) years. The special duties and competencies and the fees of regular and substitute members, of the secretary and of the participating expert which are payable by OPAP S.A. are also defined.

Joint Decision No. 29157/2000 (GG Series B, No. 1417) of the Minister of Finance and the Minister of Culture, titled: «Approval of the General Regulation on the Organization and Operation of the games operated by OPAP S.A.» established the Committee for Inspection. This decision was abolished by paragraph 29, article 24 of Law 4141/2013 (GG Series A, No. 81). The will to abolish the multi-member inspection committees of OPAP S.A. is also present in the Explanatory Report of Law 4141/2013 (GG Series A, No. 81).

According to the second section of item a, article 17, Law 3229/2004 (GG Series A, No. 38), as amended by paragraph 7, article 54, Law 4002/2011 (GG Series A, No. 180) as in force, as well as of paragraph 3, article 28, Law 4002/2011 (GG Series A, No. 180), as in force, the inspection of the games operated by OPAP S.A. is the responsibility of the HGC. Moreover, according to the first section of paragraph 3A, article 28, Law 4002/2011 (GG Series A, No. 180), as in force, preventive compliance inspection of OPAP S.A. is the responsibility of the three-member Inspection Committee, which oversees and ensures the compliance of OPAP S.A. with the applicable law and its contractual obligations towards the Greek State.

Having regard to the above and with a view to serve the principles of good administration, equal treatment of citizens and legitimate expectation and protect public interest, the HGC issued Decision No. 162/5/02.07.2015, recommending the abolition of all provisions of paragraph 5, article 27 of Law 2843/2000 (GG Series A, No. 219), as well as of all the delegated administrative regulations and administrative deeds that were issued by virtue of such provisions. In addition, in the same decision the HGC recommended the amendment of article 18, Law 3229/2004 (GG Series A, No. 38), on setting up the Inspectors' Register, as in force, with regard to the competence of the Minister of Finance to determine the remuneration of the members of the Inspectors' Register.

8.5 RECOMMENDATION ON THE OPTIMIZING THE PROCEDURE FOR THE MODIFICATION OF THE NUMBER AND COMPOSITION OF THE TECHNICAL EQUIPMENT AND MATERIALS USED IN CASINOS

Paragraph 2, article 1, Law 3139/2013 (GG Series A, No. 100), as in force, provides for a different procedure, which only applies to the Casino of Parnitha, for the modification of the number or the composition of the technical equipment and materials used in casino gambling. Following

paragraph 2, article 1 of the above law «the number and the type of games of the sub-item bb, item c, paragraph 1 are modified by the joint decision of the Minister of Economy and Finance, and the Minister of Development, and published in the Government Gazette following an opinion by the Committee on the Supervision of the Operation of Casinos».

Since this procedure is more time consuming than the procedure followed for other casinos, and given that the administration must address similar requests in the same manner, the HGC recommended to the Minister of Finance the amendment of the relevant provisions by its Decision No. 184/4/12.11.2015.

9

COURT CASES AND ASSISTANCE BY THE HGC IN PARLIAMENTARY CONTROL

9.1 LEGAL DISPUTES

The legal disputes that the HGC managed during 2015 cover all the fields of its competences and concern all gambling service providers. Specifically:

- A number of legal disputes were raised regarding the implementation and interpretation of the terms of casino operating licenses, such as the dispute raised by a casino as to the amount of the Greek State's share of its gross revenue and as to the annual operation duty paid. No Judgment has yet been issued on the merits of the case. However, the interim protection rulings have been in favor of the HGC, since the opponent's applications for interim judicial protection have been rejected and the terms of the contractual agreements remain in force.
- Other cases concern disputes about the HGC's decisions on the characterization of games played on broadcast media as games of chance. These cases were heard before the Council of State in 2015 and the Judgments are still pending.
- Disputes also emerged about the HGC's decisions on the setting up of collective bodies. Indicatively, we could mention the dispute about the decision of the HGC to set up a Three-Member Inspection Committee on OPAP S.A., which was resolved before the Council of State in favor of the HGC with the rejection of the application for annulment by OPAP S.A.

Moreover, in 2015, the HGC, as the universal successor of the Greek State following paragraph 10, article 28, Law 4002/2011, managed indemnification cases against the Greek State deriving from the application of the abolished Law 3037/2002 (a total of 13 cases). At first instance, the result has been in favor of the HGC and, by extension, in the interests of the Greek State. However, Judgment for a number of appeals is still pending.

Additionally, the HGC drafted opinions and transmitted administrative files in order to assist the Legal Council of State on the casino related cases that the Greek State still manages. The HGC's contribution was very important in the case of a casino requesting an indemnification of almost €26,000.000 from the Greek State. The HGC submitted the necessary information and opinions to the court and the relevant claims were rejected.

In order to defend the Greek State's interests in the best way, the HGC has assisted, and still does, the Legal Council of State in the request for arbitration that OPAP S.A. has filed against the Hellenic Republic before the London Court of International Arbitration.

Finally, the HGC immediately responded to the requests by the Ministry of Foreign Affairs and provided opinions and remarks on three (3) preliminary rulings sent to the Court of Justice of the European Union (CJEU), following the requests by the judicial authorities of Italy, Poland and Austria for the interpretation of EU law on the gaming market.

9.2 ASSISTANCE PROVIDED BY THE HGC IN PARLIAMENTARY CONTROL

In 2015, twenty-five (25) parliamentary questions on gambling were submitted to the Greek Parliament for Parliamentary Scrutiny. Most of them concerned the installation of VLT gaming machines by OPAP S.A.

The HGC assisted the Greek State with data and information in order to inform the Hellenic Parliament.

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

The project in this field was carried out by the Directorate of Regulation and Social Responsibility.

10.1 COOPERATION AT THE EUROPEAN AND INTERNATIONAL LEVEL

10.1.1 PARTICIPATION OF THE HGC IN AN EU EXPERT GROUP

Already since 2013, the HGC has been participating in the «Expert Group on Online Gambling» set up by the European Commission (DG Internal Market and Services) on the formulation of a common framework of principles and standards for online gambling (TOWARDS A COMPREHENSIVE EUROPEAN FRAMEWORK FOR ONLINE GAMBLING). As part of the project «Representation of the HGC in an EU Group of Experts» (project: 5.8 of the approved Action Plan 2013-2015), in 2015 the representatives of the HGC participated in the following ordinary meetings:

a. Meeting on 18th September 2015

The 12th Regular Meeting of the Expert Group was dedicated to the final drafting of the Administrative Cooperation Arrangement between the gambling regulatory authorities of the Member States, so that the content would be finalized. Ultimately the Arrangement was signed by the heads of the gambling regulators during a special event on 27th November 2015. The HGC contributed significantly to the work of the Expert Group for the finalizing of the content of the above Agreement. In the context of the meeting, the European research project ALICE RAP (Addiction and Lifestyles in Contemporary Europe - Reframing Addictions Project) made a presentation whose topic was how to protect consumers and prevent disorders from irresponsible gambling. The agenda of the meeting also included a discussion and a briefing on the European Commission Recommendation on the guiding principles for the protection of consumers and players of online gambling services and, in particular, for the prevention of minors from gambling online. Moreover, the national delegation presented the inspection systems applied on these games. The meeting was concluded with a briefing on recent developments regarding the manipulation of sports competitions for betting purposes, mainly at the level of the Council of Europe.

b. Meeting on 26th November 2015

The 13th regular meeting agenda started with the renewal of the Expert Group's mandate to work on online gambling for the period 2016-2018. Then, there was a discussion on the reorganization and the updating of the database (CIRCA BC) which works as an information bank for regulatory Authorities. The agenda also included a presentation on European standardization, following Regulation No. 1025/2012 (EU). This was followed by the presentation of the 4th Directive on fighting against money laundering and terrorist financing.

Two studies were also presented: The first one was on the profile of gamblers and the second on social games. The meeting was concluded with a briefing on recent developments as regards the Council of Europe Convention on the Manipulation of Sports Competitions for betting purposes.

c. Participation in the event for the signing of the Administrative Cooperation Arrangement between the gambling regulatory authorities of the EEA Member States.

On 27th of November the Administrative Cooperation Arrangement between the gambling regulatory authorities of most EEA Member States concerning online gambling services was signed. On behalf of Greece, the Arrangement was signed by the President of the HGC.

On 27th November 2015 a Special Event was organized for the signing of the Administrative Cooperation Arrangement between the gambling regulatory authorities of most EEA Member States concerning online gambling services. In the context of the event, the relative Administrative Cooperation Arrangement between the gambling regulatory authorities was signed under the chairmanship of the EU delegation. The HGC delegation, participated in the event and was headed by the President of the HGC who signed the Arrangement.

10.1.2 COOPERATION WITH EQUIVALENT AUTHORITIES AND AGENCIES ABROAD

As part of the project «Cooperation with equivalent authorities and agencies abroad» (project: 5.9 of the approved Action Plan 2013-2015), the following information visits and cooperation activities took place in 2015:

a. Workshop meeting with the European Commission DG Internal Market

The President and the officials of the HGC participated in a workshop meeting with officials of the European Commission DG Internal Market on the subject of European Commission's initiatives to enhance cooperation between the EU national regulators in the field of online gambling services. During this meeting, the President briefed the European Commission delegates, among other things, on the newly appointed officials of the HGC, the Authority's immediate priorities and its will to contribute to the works of the Expert Group in a decisive and constructive manner. The meeting took place on 12th and 13th August 2015 in Brussels.

b. Training of the HGC officials by the Independent Certification Organization GLI and the company IGT. The HGC officials participated in a training program organized by the Independent Certification Organization GLI and the company IGT, in order to acquire know-how on gaming machines certification. The training took place in Amsterdam, Netherlands on 24-27 November 2015.

c. Cooperation with other equivalent regulatory Authorities in Europe

The HGC fosters close cooperation with equivalent Authorities in Europe to allow information exchange on issues related to its regulatory and supervisory activities.

d. Participation in international and European associations and networks

The HGC is a member of the International Association of Gaming Regulators (IAGR) and the Gaming

Regulators European Forum – GREF. In 2015, the HGC also renewed its subscription to the Gambling Compliance data bank.

10.2 PARTICIPATION OF THE HGC IN CONFERENCES AND OTHER EVENTS

In 2015, the HGC participated in the following conferences and events:

10.2.1 PARTICIPATION IN THE CONFERENCE «EIG - EXCELLENCE IN iGAMING» 2015

The President of the HGC participated in the EIG Conference (Excellence in iGaming) which took place on 22-23 October 2015 in Berlin. The President had a speech during the round table titled: «Regulated Markets - Who's next, what's next».

10.2.2 PARTICIPATION IN THE 4TH INTERNATIONAL INTERDISCIPLINARY CONGRESS «E-LIFE 2015»

The President and the officials of the HGC participated in the 4th International Interdisciplinary Congress «E-LIFE 2015», organized by the Hellenic Association for the Study of Internet Addiction Disorder, in order to come into contact and exchange views with the scientific community on the prevention and fight against the negative outcomes of Internet addiction. The congress took place on 6&7 November 2015 in Athens. One of the HGC officials spoke in the congress session titled: «Users of social media participating in games of chance».

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

11.1 SETTING UP SYSTEMS FOR THE OPERATION OF THE HGC

11.1.1 SETTING UP A SYSTEM FOR THE DRAFTING OF THE HGC BUDGET

Project 7.3 «Setting up a System for the drafting of the HGC Annual Budget» of the approved Action Plan 2013-2015 concerns the acquisition of new, tailor-made software which fully automates all relevant procedures. The process is to be completed in March 2016.

In the context of project 7.3, the installation and parameterization of software according to the HGC needs is expected to contribute to saving resources (material resources, man-hours, etc) related to the drafting and monitoring of the execution of the budget, following the recent applicable laws on managing State money.

The above project was carried out by the Directorate for Financial and Administrative Affairs.

11.1.2 SETTING UP QUALITY MANAGEMENT SYSTEMS

Setting up quality management systems is necessary for the continuous improvement of the internal organization and operation of the HGC. The HGC initiated the procedure for getting its quality management system certified according to the EL0T EN ISO 9001 standard and its information security management system according to the EL0T EN ISO 27001 standard.

The HGC's decision to get these systems certified demonstrated the need to select and use a consultant who would assist to this end. In 2015, the HGC drafted a call for tenders for the «Provision of support services for the development and application of systems of quality management and information security management».

The call for tenders initiated a tender process which turned fruitless and will be relaunched in 2016.

The projects are carried out by the Directorate of Planning and Research, they are ongoing and are also included in the Action Plan 2016-2018.

11.1.3 DEVELOPMENT OF A SYSTEM FOR THE COLLECTION AND PROCESSING OF STATISTICAL DATA

The HGC plans the development of an integrated structure and mechanism for the systematic collection, monitoring, management and utilization of information, in order to ensure a more efficient and effective operation and to achieve its objectives.

Therefore, the HGC took down all necessary information as well as the process for its collection. Following a systematic study of the data, the HGC drafted a procedure for the identification,

collection, processing and dissemination of statistical data. The HGC plans to develop an electronic database to record data and to offer classified access to users.

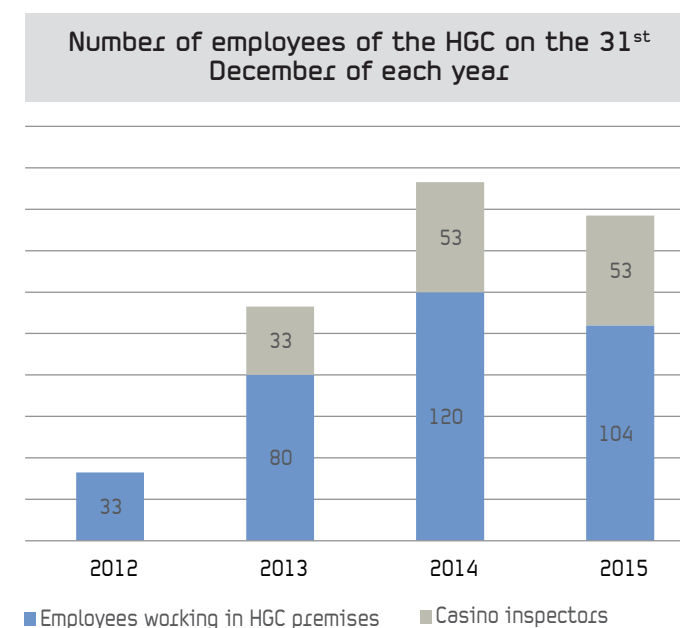
11.2 STAFFING AND DEVELOPMENT OF HUMAN RESOURCES IN THE HGC

11.2.1 STAFFING OF THE HGC

The financial situation in Greece has led the HGC to adopt as a standard principle, right from the outset, that it must make full use of all human resources already available to the Greek State before seeking to acquire extra ones, so as to avoid increased costs both for the HGC and the State as a whole. Therefore the HGC staff was mostly seconded or transferred from other services.

According to Law 4261/2014 (GG Series A, No. 107) article 173, paragraph 29, staff secondment to the HGC has a duration of four (4) years and may be extended for another four (4) years after expiry.

Also, paragraph 1, article 23, Law 4141/2013 (GG Series A, No. 81) as amended by Law 4261/2014 (GG Series A, No. 107) article 173, paragraph 25 and in force stipulates that: «Permanent staff and staff contracted for an indefinite term working in the public sector, legal entities governed by public law, 1st or 2nd level local government, public utilities or legal entities governed by private law of the wider public sector, which has been seconded to and is working at the HGC on 31st December 2014, may apply for transfer to the vacant statutory posts of the HGC within a deadline ending on 16th January 2015 upon recommendation of the HGC and by decision of the Minister of Finance and the competent Minister, without an opinion by the service council or any respective competent agency, by way of derogation from the applicable provisions». Until now, the transfer of the employees already seconded to the HGC has not been completed.



Based on the above, on 31st December 2015, the HGC staff was made up of 157 seconded employees, out of which 104 work in the HGC premises and 53 make up the inspection teams for casino enterprises assigned with the daily, on-the-spot and continuous inspection of the nine casinos across Greece, which is a significant reduction in comparison to the previous year. The small number of staff of the HGC in 2015 puts into risk the Authority's smooth operation.

The eighty (80) statutory posts of the HGC are still all vacant.

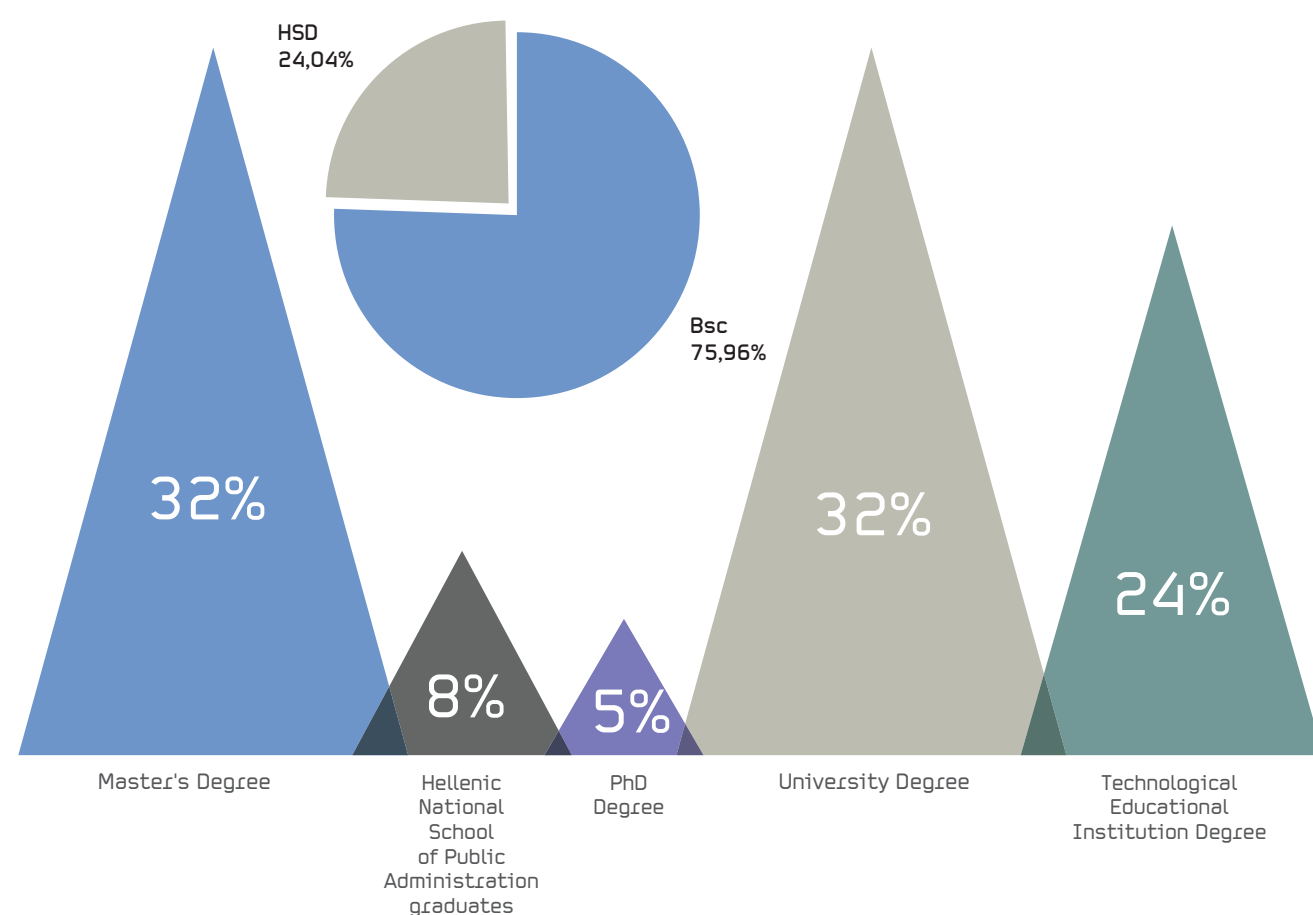
However, the number and the range of responsibilities that the HGC that were allocated to the HGC as a result of the legislative measures taken in the time

period 2012-2014 created the need for a further increase in the statutory posts of the HGC to two hundred and twenty (220), so that the Authority would be able to cope with its regulatory and supervisory-inspection work.

The staff consists mainly of Mechanical Engineers, Electrical Engineers, IT Engineers, Technical Engineers, Mathematicians, Physicists, Economists, Management and Humanities graduates, etc.

As regards the educational level of the staff working in the HGC premises, the Authority seeks to maintain the ratio of tertiary or higher level education graduates to secondary or compulsory education graduates at 75% to 25% respectively.

Staff with a higher education degree serving in the HGC offices



The educational level of all HGC employees, including the Casino Inspection Teams is shown in the table.

EDUCATIONAL LEVEL	TOTAL NUMBER OF EMPLOYEES		TOTAL
	Employees in the offices	Casino Inspection Teams	
PhD Degree	4	-	4
Master's Degree	25	-	25
Hellenic National School of Public Administration	6	-	6
University Degree	25	7	32
Technological Educational Institution Degree	19	6	25
High School Degree	25	40	65
Total	104	53	157

Educational level of the HGC employees

	Staff in the HGC offices	Casino Inspection teams
PhD Degree	4	
Master's Degree	25	
Hellenic National School of Public Administration graduates	6	
University Degree	25	7
Technological Educational Institution Degree	19	6
High school degree	25	40

Finally, the break-down of the HGC's employees per operational sector is 71% in operational actions (regulation, authorization, certification, inspection and social protection), and 29% in strategic planning and administration.

11.2.2 STAFF TRAINING

The HGC considers it necessary to ensure that an adequate level of continuous training is provided to its staff (projects 7.7 and 7.8 of the approved Action Plan 2013-2015) in the various fields of its activities.

Given that the staff working for the HGC comes from different services and agencies of the public and the wider public sector, continuous training enhances the employees' loyalty to the HGC and their commitment to their job.

The HGC staff was trained by participating in education and training programs organized by external providers, as well as with the organization of specialized training delivered in-house.

In 2015, 96 participations in 44 different education and training programs organized by external providers were approved and carried out in Greece or abroad.

Moreover, the HGC developed in-house training for all its employees, in order to offer them expert knowledge on the implementation of modern organizational and administrative procedures, with an emphasis on those related to the inspection mechanism.

For that purpose and due to the large number of participants, as well as in order to enhance effective learning, the training program was planned on the basis of the «closed training courses» model and took place on 10 & 11 October 2015. The program was titled «Training of the HGC staff in the implementation of inspection and new administrative procedures» and it consisted of three thematic units. The first unit, which accounted for the largest part of the training, concerned the operation and organization of the HGC's inspections. In the second unit, the first results of the preparation for the drafting of the HGC Action Plan 2016-2018 were presented. Finally, the program was concluded with the presentation of the electronic document management application that the HGC has been gradually adopting.

After the end of the program and within a short period of time, a hands-on training was organized for the entire staff so that they all gradually practice on the operation of the electronic document management application, under the guidance of the Information and Technology Directorate, which is responsible for implementing this project.

In 2015, the HGC staff had a total of 3,331 hours of training.

The project regarding further training is ongoing, it is included in the Action Plan 2016-2018 and it is carried out by the Directorate for Financial and Administrative Affairs.

11.3 COMMUNICATION OF THE HGC

Projects 7.20 to 7.25, falling under project 7.10 of the approved Action Plan 2013-2015 were completed in the previous year and the «Communication plan of the HGC» is now part of the official tasks performed on a daily basis and included in the Action Plan 2016-2018.

More specifically, in 2015:

- a) Printed and online press news reports as well as broadcast news reports dedicated to issues of interest to the HGC were being clipped on a daily basis (e.g. gaming market, electronic amusement games, addiction, money laundering etc.) and all employees were constantly kept updated.
- b) Moreover, the HGC issues press releases and announcements, which are posted on its website and forwarded to all media outlets (printed and electronic) in Greece, in order to inform the public on the HGC's work, but also to clarify specific issues that were deemed worthy of further clarification.
- c) The website of the HGC www.gamingcommission.gov.gr is updated on a daily basis, as part of the project «Communication Plan of the HGC», so as to provide up-to-date information and services to citizens and enterprises.

The project is ongoing, it is included in the Action Plan 2016-2018 (as an action) and it is carried out by the President's Office as regards the issues under paragraphs (a) and (b) above, and by the Directorate of Planning and Research as regards paragraph (c).

11.4 DEVELOPMENT OF IT SYSTEMS AND SUPPORT

As part of the projects «Creation of a data center», «Development of an IT system to support processes, licensing, certification and compliance inspection and to monitor the relevant registers» and «Development of an IT system for supervision and compliance inspection (ITSCI)» (projects: 7.11, 7.12 and 7.15 of the approved Action Plan 2013-2015), in 2015, the Information and Technology Directorate contributed to defining the architecture of various applications, in cooperation with the Service Units concerned, and then, after drafting the technical specifications, developed and implemented the following projects:

- Extending the web-based application and database for the supervision, inspection and monitoring of the financial management of casinos and the collection of the Greek State's share of gross gaming revenue.
- Upgrading of the web-based application for the provision of services and support to the HGC users.
- Web-based application for managing the annual leave of the HGC staff.
- Transfer of web pages and applications from the Information Society to the HGC
- Development of an application to support compliance inspections of Internet service providers (ISPs) as regards blocking access to black-listed websites
- Development of a data warehouse to receive and process complaints on the Hellenic Lotteries S.A. games.

- Development of a system of collection and processing of statistical data.

In addition, the following projects are ongoing and are expected to be completed in 2016:

- Infrastructure that ensures the continuous operation of the HGC's IT systems. (Disaster Recovery)
- Upgrading of the HGC's DataCenter equipment and software.
- Wireless microwave Internet connection
- Purchase and implementation of an electronic signature application for the HGC's activities
- Penetration tests on the HGC's IT systems
- Improvements in buildings

Finally, the Information and Technology Directorate, being the competent directorate, carried out all the necessary interventions and maintenance works on buildings, electromechanical equipment, communications equipment and IT systems for the smooth operation of all the infrastructure owned by the HGC.

11.5 TREATMENT OF OPERATIONAL NEEDS AND OTHER FINANCIAL AND ADMINISTRATIVE ISSUES

In 2015, approximately 1350 payment orders were issued and paid regarding suppliers and deductions for social security funds, out of which 300 were sent to the General Commissioner of the Court of Audit along with the necessary documentation. After being reviewed, the relevant expenditure was approved.

In 10 cases among the total of the orders sent to the General Commissioner of the Court of Audit

- Visa Denial and Return Reports were issued in 8 cases, out of which 6 were successfully contested and 2 were admitted.
- Check sheets were issued in 2 cases, for which an answer was provided and the explanations of the HGC were accepted. 600 travel expense reports for trips in Greece and abroad were settled, after having been reviewed and approved by the General Commissioner of the Court of Audit.

The following records were uploaded on the IT systems related to transparency, in accordance with the applicable law

- 70 payroll-remuneration records were uploaded on the Single Payment Authority system.
- 24 records of tax payments (of 1%, 4% and 8%), the annual record of payment of salaries and the aggregate customers and suppliers statements were uploaded on the M.I.S. of the General Secretariat of Information Systems (GSIS) - taxisnet.
- 40 entries were made in the Single Payment System, which were related to acknowledgment of charges

and payment of charges and fees associated with telecommunication services.

- 300 approved payment orders were uploaded on the transparency portal «Diavgeia».

200 Approvals of Expenditure and Commitments were issued and uploaded on «Diavgeia».

500 domestic and international bank transfers were recorded and executed via internet banking.

44 public procurement contracts for the purchase of goods and services by the HGC were drafted and signed after the necessary clearance of the draft agreements was obtained from the Court of Audit, in order to cover the operational needs of the HGC, showing an increase of 120% in comparison to the previous year.

The contracts were awarded to the lowest bidder following an extensive market research and receipt of the relevant offers.

Specifically, 3 tenders and one invitation to submit offers were prepared and carried out, for a total budget of 87,000 euros (VAT excluded), in accordance with applicable law. Then two out of the three tenders and the invitation to submit offers were awarded and the relevant agreements were signed.

These are analyzed in the table below:

TYPE	Budget (VAT excluded)	Awarding Price (VAT excluded)
Tenders		
1. Security services for the building and the offices of the HGC	23,000.00 €	21,748.56 €
2. Cleaning services for the building and offices of the HGC	30,000.00 €	28,246.04 €
3. Support services provided to the HGC for the development and implementation of quality management and information security systems	20,000.00 €	Cancellation of the Tender results & relaunch of new tender in 2016
Invitation to submit offers		
1. Maintenance and technical management of the electromechanical equipment and the building where the premises of the HGC are located.	14,000.00 €	11,700.00 €

11 ANNUAL ACTIVITY REPORT ON THE ORGANIZATION AND OPERATION OF THE HGC

In the effort to abide by the procurement procedures and the rules on transparency provided for in the applicable law, 222 notices were posted on the website of the «National eProcurement System (ESIDIS)», i.e. a 58% increase in comparison to the previous year.

Moreover, in order to comply with the requirements of Law 4305/2014 on the availability and free use of public documents - «Open Public Data», a Project Management Team was formed with the participation of officials from all the departments of the HGC. The team's main task was to record and assess the total of documents, information and data of the Authority, as well as to continuously update such data and their distribution process in order to comply with the principle of the availability of data in the HGC.

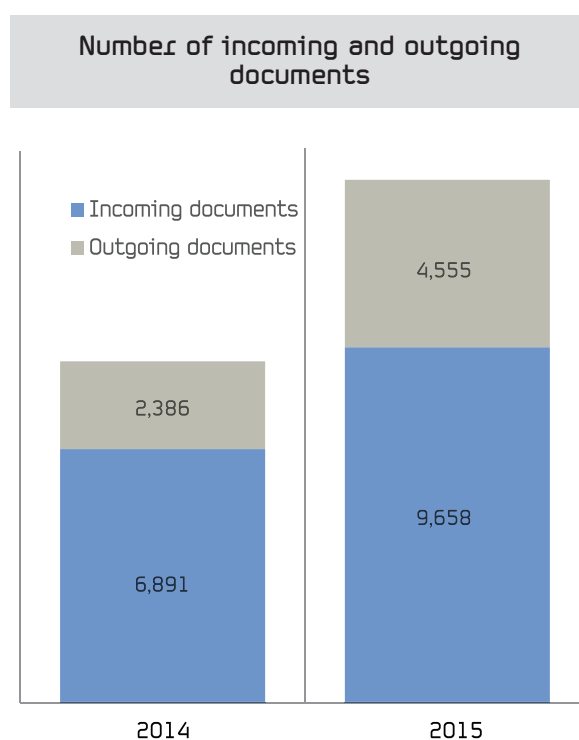
Finally, throughout the year, the work of the cleaning staff team was being inspected on a daily basis and the necessary guidance was provided in order to ensure the cleanliness of the premises, the equipment and the external areas of the building to the HGC standards.

As far as the management and processing of documents is concerned, the following information is available for the year 2014:

The central register of incoming and outgoing documents is kept in manuscript and electronically. The total volume of incoming and outgoing documents was equivalent to 14,213 unique reference numbers, an increase of 54% in comparison to the previous year.

Specifically, 9,658 documents (40% increase) were received from various services, bodies and citizens and forwarded to the competent HGC service units and 25,000 true copies were made of the 4,555 outgoing documents (almost double in comparison to the previous year) that were forwarded to various services, bodies and citizens.

On 13/11/2015, the «Electronic Register -Document Management» application was launched and started being used by the staff in the Central Services of the HGC after they had completed the necessary training. The staff of the HGC manages all incoming and outgoing documents with the use of this application, depending on their application access level which is based on their rank.



DOCUMENTS	2014	2015
Incoming documents	6,891	9,658
Outgoing documents	2,386	4,555
TOTAL	9,277	14,213

The above project was carried out by the Directorate for Financial and Administrative Affairs.

As from 2014, following a recommendation by the HGC, all the categories of expenditure incurred by the Authority are subject to prudential supervision by the Court of Audit by virtue of Presidential Decree 31/2014 (GG Series A, No. 56).

An effort is continuously made to keep expenditure at the lowest possible level, but also to collect revenues. As a result, the HGC budgets prepared for the years 2014, 2015 and 2016 were all in surplus.

Following para. 8, article 28 of Law 4002/2011, such surplus is paid in whole or in part to the Greek State, by decision of the Minister of Finance. Against this background, the HGC decided (Decision No. 194/4/15.02.2016) to recommend to the Minister of Finance to issue a decision for the payment to the Greek State of the surplus amount of 5,000,000 euros that resulted from the management of the HGC's accounts.

Moreover, the HGC, in compliance with Legislative Decree A 41/2015 immediately transferred its cash balance of 6.7 million euros to the Bank of Greece.

12.1 FINANCIAL DATA FOR THE YEAR 2015

12.1.1 REVENUE

According to the provisional financial accounts, the revenue of the HGC in 2015 is estimated at 8,700,877.05€ and is broken down as follows:

1. Revenue from the 0.5% Share of Gross Gaming Revenue (GGR)

This is the share of revenue from all games under item a, paragraph 7, article 28 of Law 4002/2011 (GG Series A, No. 180), as replaced by paragraph 6, article 173 of Law 4261/2014 (GG Series A, No. 107) and in force, which is paid to the HGC. The revenues of the HGC from this source amounted to 7,796,833.81€ in 2015.

2. Revenue from Administrative Fees and Charges

It is revenue from administrative fees and charges for the issuance of licenses and renewal of license terms and the certification of gaming machines, games, shops, manufacturers, technicians and importers in the field of amusement games played on gaming machines and VLT gaming machines. It also includes revenue from equivalent administrative fees and charges for the certification of manufacturers-importers and technicians (items a and b, paragraph 4, article 50 of Law 4002/2011) and from administrative fees and charges for the certification of manufacturers-suppliers and maintenance technicians for casinos (technical equipment and materials used in casino gaming - Ministerial Decision T/6736/1.7.2003).

In this respect, the revenue of the HGC from administrative fees and charges in 2015 amounted to 760,860.00€

3. Other revenue

Other revenue amounted to 23,903.92€.

4. Financial Revenue

Placement of the cash available to the HGC in foreign Bank Deposits generated revenue from credit interest in the amount of 119,279.32€.

12.1.2 EXPENDITURE

In the field of expenditure, an effort was made to keep operating expenses, supplies and other costs at the lowest possible level, by managing the available resources more effectively and measuring the productivity of each action.

According to the provisional financial data, total expenditure in 2015 is estimated at 5,530,414.60€ and was covered with own resources.

These are the categories of expenditure incurred in 2015:

1. Fixed - Investment Costs

Investment Costs amounted to 26,890.08€ and consist of the costs of establishment, the purchase of computers, electronic systems and the necessary software, the purchase of telecommunications equipment and other equipment.

Investment Costs account for 0.49% of the total expenditure of the HGC.

2. Operating Expenses

Operating Expenses amounted to 5,503,524.52€ and include:

- Payroll costs: The cost of employees' salaries, including employer contributions and other labor costs, amounted to 4,401,303.56€. This amount refers to the salaries of all the people seconded to the HGC in the period January-December 2015. Payroll costs account for 79.97% of the total Operating expenses and 79.58% of the total expenditure of the HGC.

- Other Operating Expenses:

This cost is estimated at 575,265.40€ and is broken down as follows:

Operating expenses for third-party costs in the amount of 186,788.57€ (3.39% of total operating expenses).

Various costs, such as rents, power supply, water supply, telecommunications, building maintenance and other services, totaling 388,476.83€ (7.06% of total operating expenses).

- Other expenses:

These expenses include reception, hosting and promotion costs, subscriptions, stationery, consumables and travel costs, totaling 526,955.56€ (9.57% of total Operating Expenses). It

should be noted that travel costs and, in particular, per diem for the casino inspectors who have to travel across the country and be physically present in the casino enterprises 24hours a day and throughout the year account for 88.36% of this category of expenditure.

12.2 THE HGC BUDGET FOR 2016

In October 2015, the HGC drafted its annual Budget of Revenue and Expenditure for 2016, which is in surplus. The above Budget was approved by Decision No. 179/9/19.10.2015 of the HGC. Finally, the approved Budget was published on the website of the program «Diavgeia».

Having regard to the principles that the HGC has been committed to serve and the rules of: «Maximum utilization of available resources», «Effective utilization of resources» and «Cost-effective management» that it has adopted and implements, the budgets that were prepared both for 2015 and 2016 were in surplus.

The 2016 Budget was drawn up by the Directorate for Financial and Administrative Affairs, in cooperation with all the service units of the HGC.

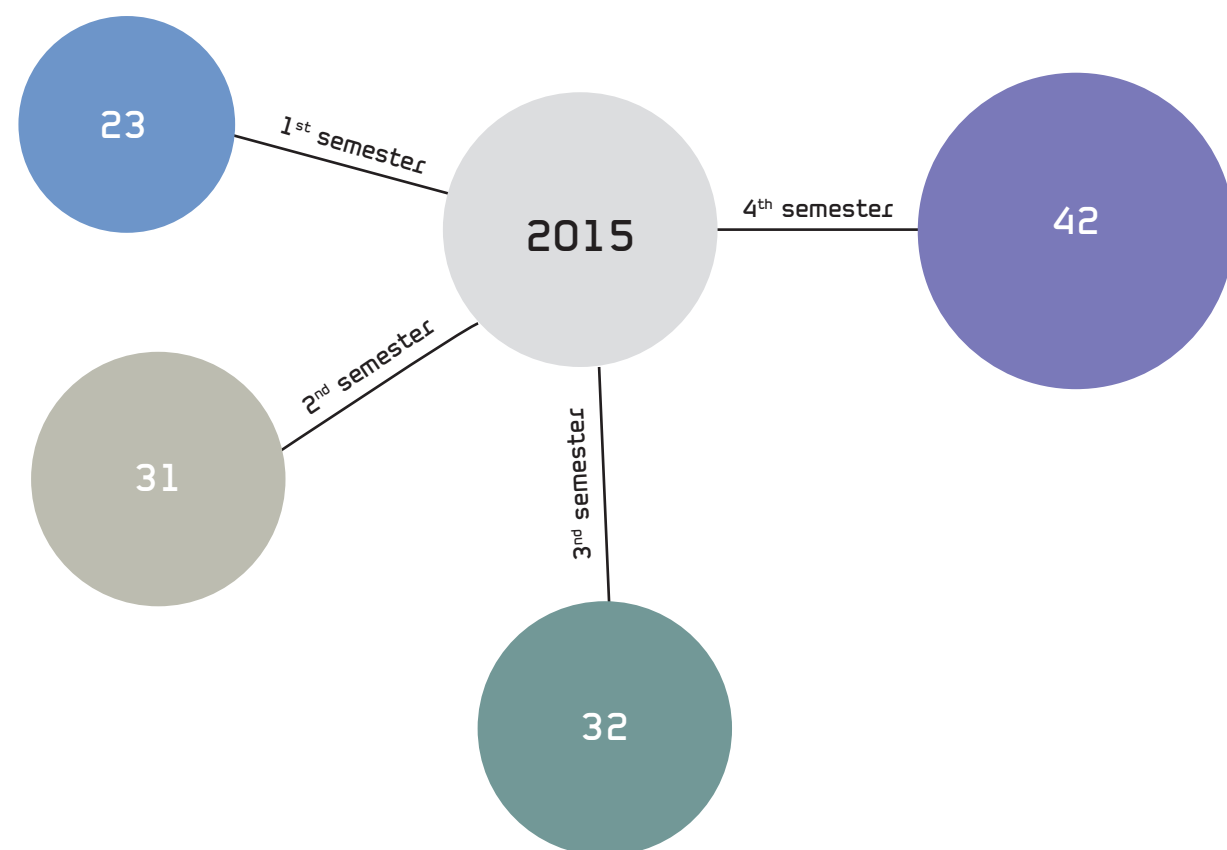
13 HGC MANAGEMENT ACTIVITIES

The members of the HGC had regular meetings and issued decisions on issues relating mainly to the regulation and supervision of the gaming market, regulatory, inspection and compliance matters, proposals for technical regulations, as well as issues relating to the internal organization and operation of the HGC.

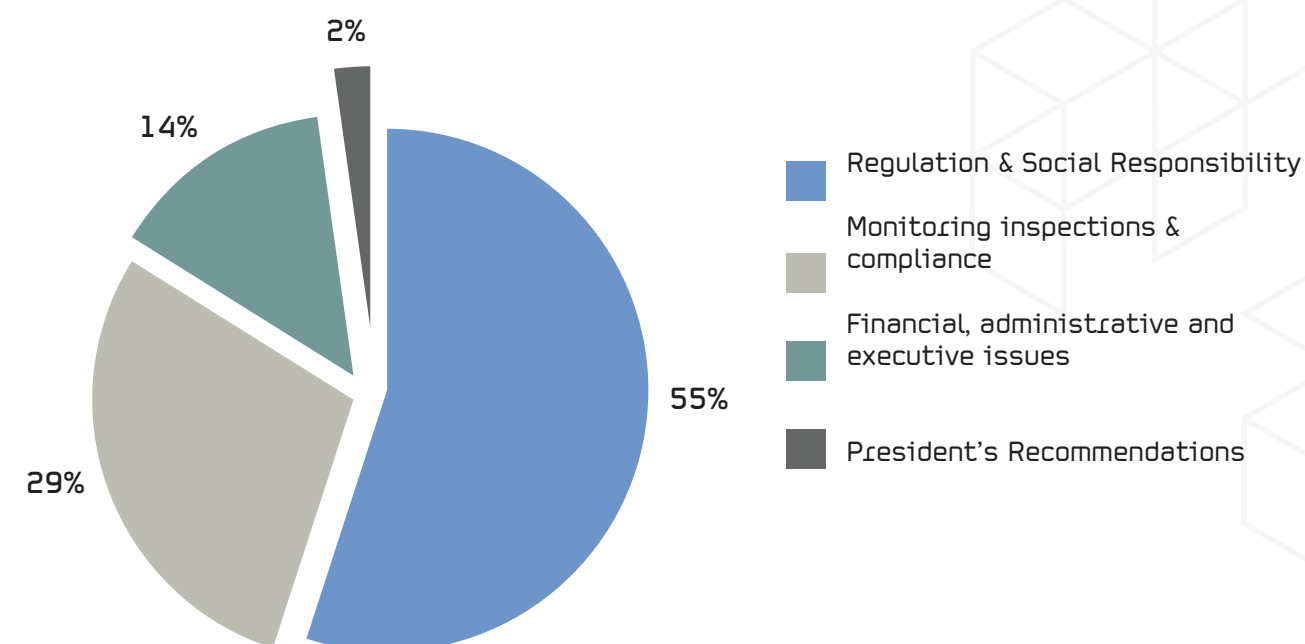
Fifty-two (52) meetings took place, one hundred and fifty-five (155) issues were examined and one hundred and twenty-eight (128) related decisions were taken.

In addition, by a unanimous decision of the HGC, two (2) dialogue committees were set up in order to meet with officials of OPAP S.A., following the provider's relevant complaint. These two committees consisted of Members from the HGC who were assisted by the Authority's officials and exchanged views with OPAP S.A. on issues related to the Regulation of VLT gaming machines that were raised by the provider.

DECISIONS OF THE HGC ON A QUARTERLY BASIS



DECISIONS OF THE HGC IN 2015



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

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AN OVERVIEW OF THE ACTION PLAN 2013-2015

14.1 A SUMMARY ACTIVITY REPORT ON THE ACTION PLAN 2013-2015

In the interest of a more comprehensive management of the planning, implementation and evaluation of its work, the HGC had drafted and implemented, already in its first year of operation, a three-year Action Plan for the period 2013-2015.

In its first Action Program, the HGC defined its strategic goals and identified 7 operational priorities. It also determined which projects should be implemented in order to achieve the program goals, observe the law, fulfill the responsibilities of the HGC, cater for the needs created by the forthcoming market conditions (for instance, privatizations, fines for electronic amusement games) and cover basic organizational demands. At the same time it defined the method of implementation of certain projects and appraised the needs as regards the statutory framework, resources and infrastructure (e.g. the IT system for the reception and management of applications for certification, the inspection manuals). Finally, the projects were put in order of priority and the schedule for their implementation was prepared.

It should be noted that all these things had to be done, not by a mature and experienced agency, but an authority that was less than a year in existence and had no more than 30 employees overall, when the gaming market was under expansion and deep restructuring.

These are the most important projects that the HGC implemented from the day it started operating and until completion of the Action Plan 2013-2015.

Proposals for technical regulations, improvements and corrections.

It is worth stating that, from Law 4002/2011 onwards, 14 pieces of legislation have included provisions for gaming and the HGC, in most cases, following a recommendation by the HGC.

Regulation on electronic amusement games - Abolition of fines. Launch of licensing and certification procedures.

As soon as the draft regulation on electronic amusement games was prepared and the EU was notified the fines imposed by the European Commission to Greece were lifted.

Upon publication of the regulation, the licensing and certification procedure was launched with the support of an online IT system.

Regulation on State Lotteries.

Special regulations - privatization

The Regulation introduces for the first time provisions for the supervision and compliance in inspection of private operators of state lotteries. Among others, emphasis was placed on the certification of all stakeholders, the traceability of lottery tickets, the certification of randomization equipment and procedures and the creation of inspection paths.

Regulation and Technical Specifications (TS) for VLTs - privatization

Emphasis was placed on the specifications for systems, machines and premises and on matters related to the protection of the public and players, such as distance from schools, opening hours, spending limits. Amendment of legislation on inspection methods so as to allow inspections at any time and not only real time.

Regulation on Mutual Betting on Horse Racing - privatization

Dealing with multiple betting choices (domestic and foreign horse races, domestic and foreign bets, bets on real and historical facts, online betting services. Technical requirements and mandatory certification of automated betting management systems (totalizator betting).

Regulation on online gambling penalties Black list

Met with strong reaction from the providers, mainly through their association (RGA), and caused the intervention of the EU. Temporary suspension until the EU is notified of the technical regulations. In July 2013 the first black list was drawn up with 438 unlicensed gambling sites. It is now in its 8th edition.

Broadcast media. Law amendment. General principles of operation. Inspections. Proposal for abolition.

Lack of international experience on regulation. There are no rules or specifications at an international level that have managed to ensure the integrity of draws. Inspection difficulties when carried out abroad. Having ascertained the great extent of infringements committed and under the influence of the general disapprobation expressed by the society, the HGC proposed a blanket ban of these games.

Regulation on Commercial communication.

Integration of the relevant provisions into a horizontal regulation. Strict rules for protection of the public. Establishment of a procedure for prior review and approval. Regulations on sponsorships and actions promoting social responsibility.

Undertaking casino supervision and compliance inspection. Amended regulation.

As soon as this responsibility was undertaken,

the relevant framework for supervision and compliance inspection was fully updated. Note, among others, the delegation of tasks to casinos (banned players, employees' certificates of suitability), the simplification of administrative approvals (replaced with notifications), the abolition of the renewal requirement for technical equipment and materials, the modification of the method of calculating reserves, etc.

Relocation of Thrace Casino. Provision for operation of casinos on a seasonal basis, subject to certain conditions. Measures to deal with the difficulties caused by capital controls.

Casinos. Revoked licenses due to debt. Modification of collection of State rights.

Sanctions imposed (proposal for withdrawal of licenses to the Ministry of Finance) due to non-payment of state rights. Modification of legal framework, transfer of responsibility to the HGC. Forced payment and settlement of debt under threat of closure. New method of payment of state rights, which is now carried out on a daily basis.

Responsible Gaming.

A Code of Principles for the protection of minors and vulnerable groups, as well as fairness in gaming activities.

Regulation of the online operation of «Pame Stochima».

A regulation was issued also allowing the operation of the pre-defined bet on the internet. Emphasis was placed, among others, on the identification of players, electronic transactions, the methods of maintaining and ensuring the integrity of electronic files, etc.

Anti-Money Laundering Regulation (AML)

Compliance with the relevant EU Directive, winner's name on winning tickets as a condition for the issue of tax certificates. Integration of

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AN OVERVIEW OF THE ACTION PLAN 2013-2015

all provisions on providers, apart from casinos. Measures to deal with the difficulties caused by capital controls.

Transitional regime for online gambling. Weaknesses of the regulatory framework and its implementation

The weaknesses of the regulatory framework and its implementation are identified and highlighted. The spirit of the legal provisions is violated by making use of subsidiaries and white label agreements in order to avoid back taxes. The establishment of a final licensing regime needs to be accelerated and the transitional regime abolished.

Regulation on Inspections.

It sets out the general principles for inspection activities and regulates matters related to the

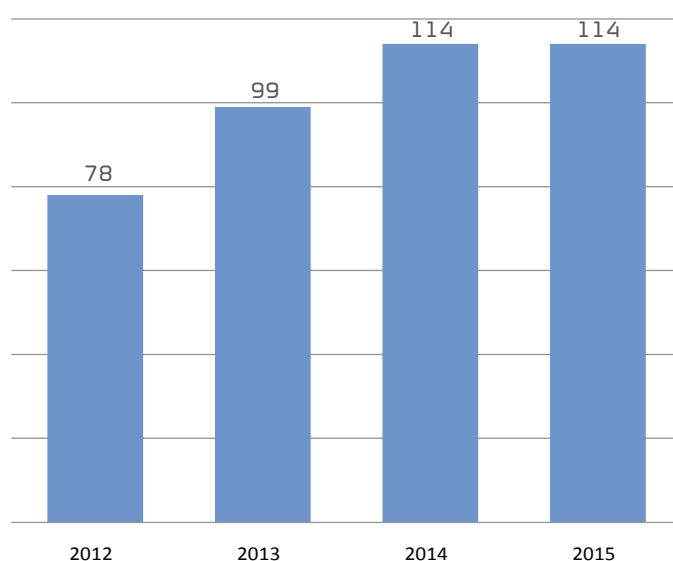
type and frequency of inspections, the selection of inspected entities, the criteria of selection for inspectors, etc. Other issues regarding the setting up and operation of a Gaming Inspectors' Register are also regulated thereby.

Proportional system of sanctions.

It ensures the proportionality of sanctions, in the most objective manner to the extent possible; both as regards infringements within the same market field and same or similar infringements in different fields, also providing the legal grounds for decisions on the imposition of sanctions. The degree of severity of each offense is defined on the basis of 4 criteria (public interest, fulfillment of terms and conditions for the operation of games, crime deterrence, social repercussions).

14.2 AN OVERVIEW OF THE PROGRESS IN THE IMPLEMENTATION OF THE ACTION PLAN 2013-2015

Plan of action 2013-2015 (total projects per year)



Initially, the Action Plan 2013-2015 included 78 projects and, as expected, in the course of time new projects were added and the priority of others was redefined, mainly due to external factors (e.g. accelerated transfer of the responsibility for casino supervision, evolution of privatizations).

In its final form, the Plan included 114 projects. More specifically, in 2012, the HGC drafted the first Action Plan, with 2013-2015 as its reference period, which was approved by virtue of Decision No. 46/4/5.3.2013 of the HGC.

The following table shows the number of projects per stage of implementation on a yearly basis, as well as the objectives achieved (completed and ongoing projects)

as a share of total projects. For a better overview of the progress that the HGC has made in the implementation of its projects, the year of inception is also reported on.

Initially, the share of total projects under the Action Plan corresponding to completed and ongoing projects was 21% and the remaining 79% were the projects that the HGC should implement in the period 2013-2015; this was expected since the program was still in its first year of planning.

In the following year, we had completely the opposite situation, with the greatest part of the Action Plan projects having been completed or already running. These projects accounted for 72% of the total projects that the HGC had set as a target to complete.

In 2014, the Action Plan 2013-2015 performed even better with 85% of projects having been completed or already running, and a further improvement in 2015.

ACTION PLAN			
2012: YEAR OF INCEPTION			
Project implementation stage	Projects per implementation stage	Share of total projects, per implementation stage	Share of total projects corresponding to completed and ongoing projects
Completed	4	5%	21%
Ongoing	12	15%	
Awaiting implementation	62	79%	Share of total projects awaiting implementation
Rescheduled	0	0%	79%
Total	78	100%	

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AN OVERVIEW OF THE ACTION PLAN 2013-2015

ACTION PLAN

2013: FIRST YEAR OF IMPLEMENTATION

Project implementation stage	Projects per implementation stage	Projects, per stage of implementation, as a percentage of total	Completed and ongoing projects as a percentage of total projects
Completed	12	12%	72%
Ongoing	59	60%	
Awaiting implementation	28	28%	Share of total projects awaiting implementation
Rescheduled	0	0%	
Total	99	100%	28%

2014: SECOND YEAR OF IMPLEMENTATION

Project implementation stage	Projects per implementation stage	Projects, per stage of implementation, as a percentage of total	Completed and ongoing projects as a percentage of total projects
Completed	59	52%	85%
Ongoing	38	33%	
Awaiting implementation	17	15%	Share of total projects awaiting implementation
Rescheduled	0	0%	
Total	114	100%	15%

2015: THIRD YEAR OF IMPLEMENTATION

Project implementation stage	Projects per implementation stage	Projects, per stage of implementation, as a percentage of total	Completed and ongoing projects as a percentage of total projects
Completed	79	69%	87%
Ongoing	20	18%	
Awaiting implementation	4	4%	Share of total projects awaiting implementation
Rescheduled	11	10%	
Total	114	100%	13%

More specifically, the progress of all the projects included in the Action Plan 2013-2015 in the last year of its implementation was as follows:

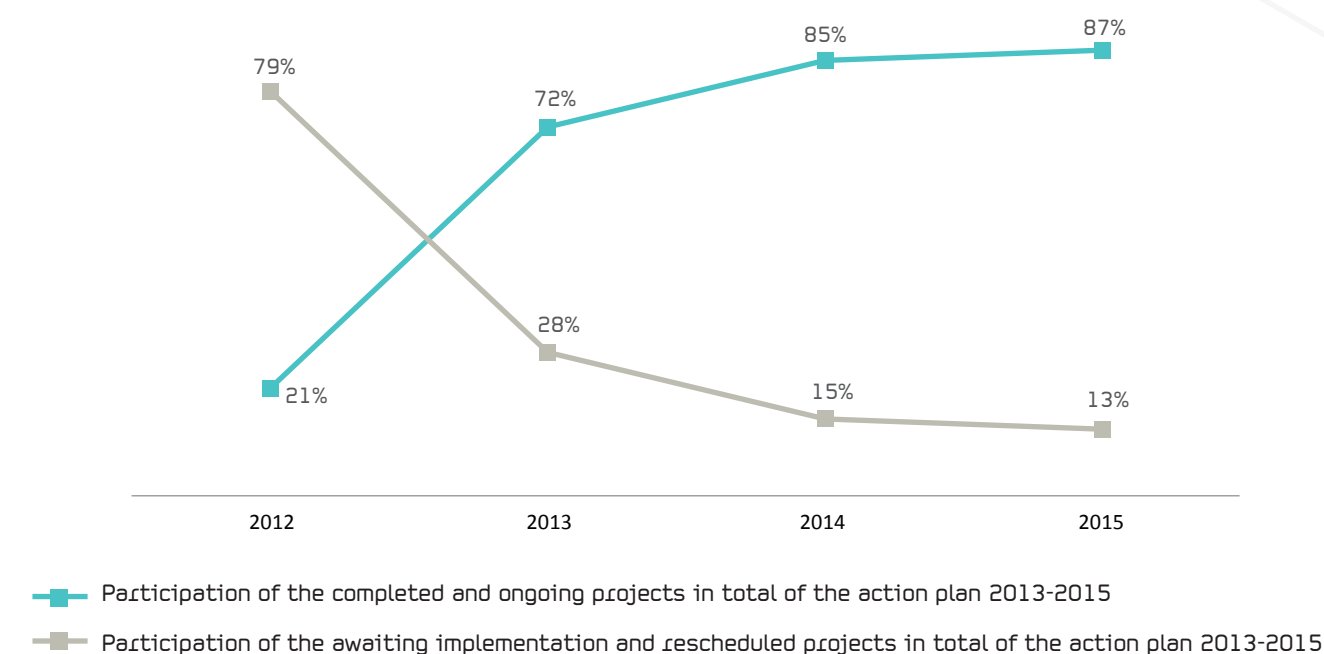
Completed: 79 projects. These include 50 separate projects and 29 projects-actions, whose planning and initial stage of implementation have been completed, but which will be ongoing from now on, as they are part of the daily activities of the HGC as a service.

Ongoing: 20 projects, which have started and are being regularly implemented.

Awaiting implementation: 4 projects which have been scheduled to start as part of the Action Plan 2016-2018.

Rescheduled: 11 projects that have to be rescheduled. These are projects that were merged with other projects under the Action Plan 2016-2018 or projects whose implementation depends on possible changes in the statutory framework for gambling.

PROGRESS OF IMPLEMENTATION OF THE ACTION PLAN 2013-2015



The project percentage complete per Operational Priority is presented in the following table.

The percentage of completion of projects under Operational Priorities 3, 5 and 7, which refer to certification, development of actions for the protection of the public and development of systems for the organization and operation of the HGC, is between 88% and 100%, i.e. above the average 87% for the Action Plan as a whole.

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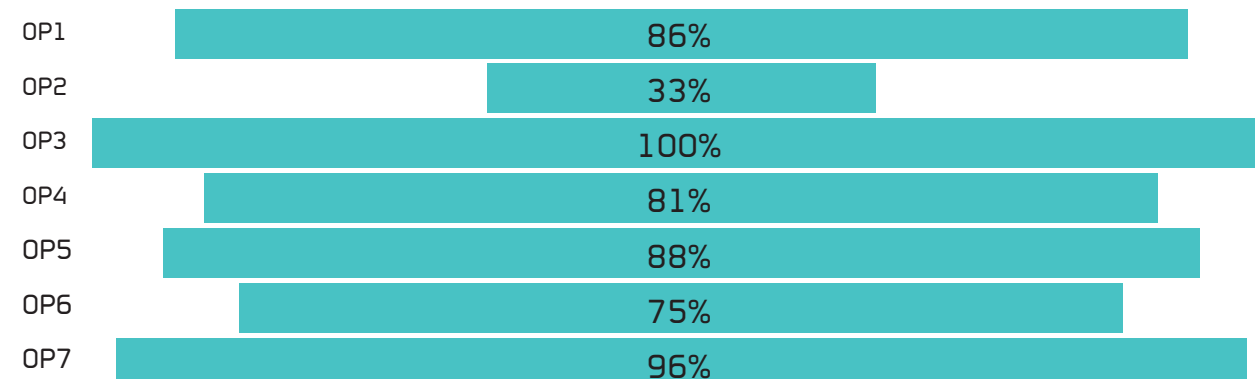
AN OVERVIEW OF THE ACTION PLAN 2013-2015

The percentage of completion of projects under Operational Priorities 1, 4 and 6, which refer to the implementation of the statutory framework for gaming, the compliance inspection mechanism and the development and implementation of the statutory framework for the operation of the HGC, is between 75% and 86%.

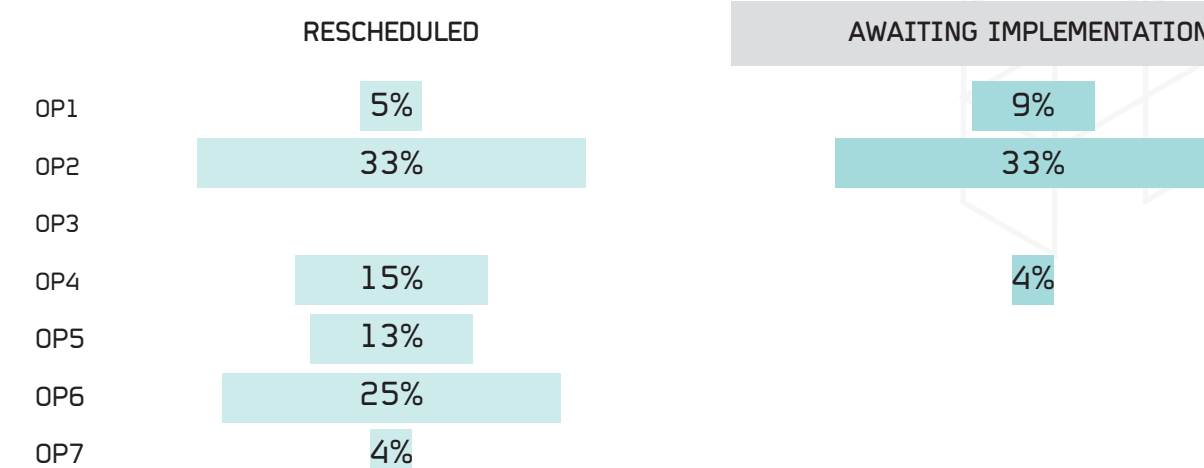
ACTION PLAN 2013-2015					
	Completed	Ongoing	Awaiting implementation	Rescheduled	Total
OP1	15	4	2	1	22
OP2	1		1	1	3
OP3	14				14
OP4	13	8	1	4	26
OP5	9	5		2	16
OP6	6			2	8
OP7	21	3		1	25
Total	79	20	4	11	114

The projects under Operational Priority 2, referring to the licensing of gaming operations are 33% complete. The project-action «Issuance of operating licenses for electronic amusement games played on gaming machines» is completed, whereas the project «Issuance of operating licenses for online gambling.» and «Issuance of operating licenses for Gambling on Broadcast Media» have not started yet and will be rescheduled.

Share of total projects under the Action Plan 2013-2015 corresponding to completed and ongoing projects, per Operational Priority



Share of total projects under Action Plan 2013-2015 corresponding to completed and ongoing projects, per Operational Priority



The following tables presents in detail the projects and actions of the Action Plan 2013-2018 with a timetable of implementation per Operational Priority.

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AN OVERVIEW OF THE ACTION PLAN 2013-2015

ACTION PLAN 2013-2015						
PROJ. CODE	PROJECT TITLE	Strategic Goal				IMPLEMENTATION STAGE
		SG1	SG2	SG3	SG4	
Operational Priority (OP1): Development and implementation of a statutory framework on gaming						
1.1	Drafting a regulation on the operation and compliance inspection of electronic amusement games on gaming machines.	●				Completed
1.2	Drafting a regulation on the operation and compliance inspection of online amusement games.	●				Rescheduled
1.3	Drafting a regulation on the operation and compliance inspection of games of chance played on VLT gaming machines.	●				"Ongoing Action Plan 2016-2018"
1.4	Drafting a regulation on the operation and compliance inspection of online gambling.	●				Completed
1.5	Drafting regulations on the operation and compliance inspection of the games operated by OPAP S.A.	●				"Ongoing Action Plan 2016-2018"
1.6	Drafting a regulation on the operation and compliance inspection of mutual horse racing betting.	●				Completed
1.7	Drafting a General regulation on the operation and compliance inspection of the State Lotteries game.	●				Completed
1.8	Drafting a regulation on the operation and compliance inspection of gambling on broadcast media.	●				"Ongoing Action Plan 2016-2018"
1.9	Drafting a regulation on the operation and compliance inspection of casino gambling.	●				"Ongoing Action Plan 2016-2018"
1.10	Overview of gaming laws.	●	●	●		"Completed (official tasks performed on a daily basis)"
1.11	Drafting a regulation on gaming penalties.		●	●		Completed
1.12	Drafting a regulation on commercial communication.	●	●	●		Completed
1.13	Drafting a Special regulation on the operation and compliance inspection of the "Ethniko" lottery game.	●				Completed
1.14	Drafting a Special regulation on the operation and compliance inspection of the "Laiko" lottery game.	●				Completed
1.15	Drafting a Special regulation on the operation and compliance inspection of the Special Lotteries game.	●				Completed
1.16	Drafting a Special regulation on the operation and compliance inspection of the Instant Lottery game.	●				Completed

ACTION PLAN 2013-2015						
PROJ. CODE	PROJECT TITLE	Strategic Goal				IMPLEMENTATION STAGE
		SG1	SG2	SG3	SG4	
Operational Priority (OP1): Development and implementation of a statutory framework on gaming						
1.17	Checking the legality of operation of the companies falling under the transitional regime of paragraph 12, article 50 of of Law 4002/2011.	●		●		Completed
1.18	Drafting a regulation on the certification of Technicians in the field of electronic amusement games and gaming machines and in the field of VLT games and gaming machines, as well as on the creation of the relevant registers.	●				Completed
1.19	Drafting the technical specifications (TS) for the operation of games of chance played on VLT gaming machines.	●				Completed
1.20	Regulation on the implementation of measures to fight money laundering and terrorist financing by Obligated Parties in the gambling services market.	●	●			Completed
1.21	Study titled “The case of casino-style online games. Game and User.	●		●		Awaiting implementation Action Plan 2016-2018
1.22	Regulation on the implementation of measures by casino enterprises to fight money laundering and terrorist financing in gambling.	●	●			Awaiting implementation Action Plan 2016-2018
Operational Priority (OP 2): Licensing of gaming operations						
2.1	Issuance of operating licenses for electronic amusement games played on gaming machines.	●	●	●		Completed (official tasks performed on a daily basis)
2.2	Issuance of operating licenses for online gambling.	●	●	●		Rescheduled
2.3	Issuance of operating licenses for gambling on broadcast media.	●	●	●		Awaiting implementation Action Plan 2016-2018

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AN OVERVIEW OF THE ACTION PLAN 2013-2015

ACTION PLAN 2013-2015						
PROJ. CODE	PROJECT TITLE	Strategic Goal				IMPLEMENTATION STAGE
		SG1	SG2	SG3	SG4	
Operational Priority (OP3): Certifications						
3.1	Certification of electronic amusement games.	●	●	●		Completed (official tasks performed on a daily basis)
3.2	Certification of games of chance played on VLT gaming machines.	●	●	●		Completed (official tasks performed on a daily basis)
3.3	Certification of casino gambling and gaming machines.	●	●	●		Completed (official tasks performed on a daily basis)
3.4	Characterization of games played on broadcast or other media as games that involve or do not involve chance.	●	●	●		Completed (official tasks performed on a daily basis)
3.5	Certification of gaming machines used for electronic amusement games.	●	●	●		Completed (official tasks performed on a daily basis)
3.6	Certification of VLT gaming machines.	●	●	●		Completed (official tasks performed on a daily basis)
3.7	Certification of premises operating electronic amusement games played on gaming machines.	●	●	●		Completed (official tasks performed on a daily basis)
3.8	Certification of premises operating games of chance played on VLT gaming machines.	●	●	●		Completed (official tasks performed on a daily basis)
3.9	Certification of Manufacturers of games of chance and gaming machines.	●	●	●		Completed (official tasks performed on a daily basis)
3.10	Certification of Importers of games of chance and gaming machines.	●	●	●		Completed (official tasks performed on a daily basis)
3.11	Certification of Technicians in the field of electronic amusement games and gaming machines.	●	●	●		Completed (official tasks performed on a daily basis)
3.12	Certification of Technicians in the field of games of chance and gaming machines.	●	●	●		Completed (official tasks performed on a daily basis)
3.13	Definition of Fees and Charges for the operation of games of chance played on VLT gaming machines.	●	●	●		Completed
3.14	Characterization of games as electronic amusement games or other.	●	●	●		Completed (official tasks performed on a daily basis)

ACTION PLAN 2013-2015						
PROJ. CODE	PROJECT TITLE	Strategic Goal				IMPLEMENTATION STAGE
		SG1	SG2	SG3	SG4	
Operational Priority (OP 4): Development and implementation of a compliance inspection mechanism for the gaming market						
4.1	Drafting a manual on compliance inspection procedures for electronic amusement games played on gaming machines.	●	●			Completed
4.2	Drafting a manual on compliance inspection procedures for online gambling.	●	●			Rescheduled
4.3	Drafting a manual on compliance inspection procedures for games of chance played on gaming machines.	●	●			Completed
4.4	Drafting a manual on compliance inspection procedures for OPAP S.A. and its retailers.	●	●			Ongoing Action Plan 2016-2018
4.5	Drafting a manual on compliance inspection procedures for games of chance operated by OPAP S.A.	●	●			Ongoing Action Plan 2016-2018
4.6	Drafting a manual on compliance inspection procedures for casino gambling.	●	●			Ongoing Action Plan 2016-2018
4.7	Drafting a manual on compliance inspection procedures for gambling on broadcast media.	●	●			Ongoing Action Plan 2016-2018
4.8	Drafting a manual on compliance inspection procedures for commercial communication.	●	●	●		Ολοκληρώθηκε
4.9	Staffing of the Gaming Inspectors' Register.		●	●		Completed (official tasks performed on a daily basis)
4.10	Compliance inspection of online gambling.		●	●		Completed (official tasks performed on a daily basis)
4.11	Compliance inspection of the games of chance operated by OPAP S.A.		●	●		Ongoing Action Plan 2016-2018
4.12	Compliance inspection of the games of chance operated by HELLENIC LOTTERIES S.A.		●	●		Completed (official tasks performed on a daily basis)
4.13	Compliance inspection of mutual horse racing betting.		●	●		Ongoing Action Plan 2016-2018
4.14	Compliance Inspection of casino gambling.		●	●		Completed (official tasks performed on a daily basis)
4.15	Compliance Inspection of games of chance played on VLT gaming machines.		●	●		Ongoing Action Plan 2016-2018

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AN OVERVIEW OF THE ACTION PLAN 2013-2015

ACTION PLAN 2013-2015							
PROJ. CODE	PROJECT TITLE	Strategic Goal				IMPLEMENTATION STAGE	
		SG1	SG2	SG3	SG4		
Operational Priority (OP 4): Development and implementation of a compliance inspection mechanism for the gaming market							
4.16	Compliance inspection of gambling on broadcast media.		●	●		Completed (official tasks performed on a daily basis)	
4.17	Compliance inspection of amusement games played on gaming machines.		●	●		Completed (official tasks performed on a daily basis)	
4.18	Inspection of compliance with the rules on commercial communications.	●	●	●		Completed (official tasks performed on a daily basis)	
4.19	Compliance inspection of online amusement games.		●	●		Rescheduled	
4.20	Drafting a Regulation on Compliance Inspection of Games.	●	●			Completed	
4.21	Drafting a manual on compliance inspection procedures for mutual horse racing betting.	●	●			Ongoing Action Plan 2016-2019	
4.22	Drafting a manual on compliance inspection procedures for HELLENIC LOTTERIES S.A. and retailers.	●	●			Ongoing Action Plan 2016-2019	
4.23	Drafting a manual on compliance inspection procedures for lotteries.	●	●			Completed	
4.24	Drafting a manual on compliance Inspection procedures for online amusement games.	●	●			Rescheduled	
4.25	Setting up an Experts' Register.		●			Rescheduled	
4.26	Development of a data recording and reporting mechanism for State Lotteries.		●	●		Completed	

ACTION PLAN 2013-2015							
PROJ. CODE	PROJECT TITLE	Strategic Goal				IMPLEMENTATION STAGE	
		SG1	SG2	SG3	SG4		
Operational Priority (OP 5): Development of an action plan for protection of the public and vulnerable groups							
5.1	Problem gambling prevalence study.			●		Ongoing Action Plan 2016-2019	
5.2	Development of an online interactive application used to inform players and raise awareness as regards responsible gaming.			●		Completed	
5.3	Drafting a code of conduct on minors and responsible gaming.			●		Completed	
5.4	Development and promotion of synergies with other bodies as regards protection of the public and control of addiction.			●		Completed (official tasks performed on a daily basis)	
5.5	Actions for the prevention and control of problem gambling.			●		Completed	
5.6	Planning and implementation of thematic training actions (per target group and training need) related to the goals falling under this priority.			●		Completed (official tasks performed on a daily basis)	
5.7	Development of web-based audiovisual material for the HGC website.			●		Completed	
5.8	Representation of the HGC in an EU Group of Experts.	●	●	●		Completed (official tasks performed on a daily basis)	
5.9	Cooperation with equivalent authorities and agencies abroad.	●	●	●		Completed (official tasks performed on a daily basis)	
5.10	Study titled “Methodology and criteria for the age rating of electronic amusement games”.	●		●		Rescheduled	
5.11	Study on the measurement and assessment of potential risks of gambling in Greece (the case of casino games).			●		Ongoing Action Plan 2016-2018	
5.12	Information workshops for gaming service providers on matters relating to the Regulation of Commercial Communication.	●		●		Ongoing Action Plan 2016-2018	
5.13	Development of an interactive education tool titled “all roads lead to knowledge”.			●		Ongoing Action Plan 2016-2018	

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AN OVERVIEW OF THE ACTION PLAN 2013-2015

ACTION PLAN 2013-2015						
PROJ. CODE	PROJECT TITLE	Strategic Goal				IMPLEMENTATION STAGE
		SG1	SG2	SG3	SG4	
Operational Priority (OP 5): Development of an action plan for protection of the public and vulnerable groups						
5.14	Development of an interactive education application titled “the precursor is the gaming machine”			●		Ongoing Action Plan 2016-2019
5.15	Education and training of the HGC staff working in the Directorates of Audit on the Regulation on Commercial Communication.			●		Completed
5.16	Study on the mapping and investigation of illegal gambling in Greece.		●	●		Rescheduled
Operational Priority (OP 6): Development and implementation of the statutory framework of operation of the HGC						
6.1	Drafting a Regulation on the Organization, Operation and Structure of the HGC.				●	Completed
6.2	Drafting a Regulation on Financial Operation and Management.				●	Completed
6.3	Drafting a Regulation on the purchase of goods and services, and leases.				●	Completed
6.4	Drafting a Regulation on Studies and Projects.				●	Completed
6.5	Drafting a Regulation on Travel.				●	Completed
6.6	Drafting a Staff Regulation.				●	Rescheduled
6.7	Drafting a Regulation on the Code of Conduct for the Members and Staff of the HGC.				●	Completed
6.8	Codification of gaming laws.				●	Rescheduled

ACTION PLAN 2013-2015						
PROJ. CODE	PROJECT TITLE	Strategic Goal				IMPLEMENTATION STAGE
		SG1	SG2	SG3	SG4	
Operational Priority (OP 7): Development of the systems of organization and operation of the HGC						
7.1	Setting up a performance evaluation System.				●	Completed
7.2	Setting up a monitoring system for the HGC Strategic Plan and Operational Plan.				●	Rescheduled
7.3	Setting up a system for the drafting of the HGC annual budget.				●	Completed
7.4	Setting up an internal communication and external electronic communication system for the HGC.		●	●	●	Completed
7.5	Setting up a quality management system (ELOT EN ISO 9001).				●	Ongoing Action Plan 2016-2019
7.6	Setting up a database for the international regulatory framework.				●	Completed
7.7	Education and training of the staff: analysis of needs.	●	●	●	●	Completed (official tasks performed on a daily basis)
7.8	Education and training of the staff: planning and implementation of actions.	●	●	●	●	Completed (official tasks performed on a daily basis)
7.9	Setting up a system for the monitoring and management of the financial and physical scope of training and information events.				●	Completed
7.10	Communication plan of the HGC.	●	●	●	●	Completed (official tasks performed on a daily basis)
7.11	Creation of a data center.		●	●	●	Completed
7.12	Development of an IT system to support processes, licensing, certification and compliance inspection and to monitor the relevant registers.	●	●		●	Completed
7.13	Purchase of ICT equipment.				●	Completed
7.14	Purchase of office equipment.				●	Completed
7.15	Development of an IT system for supervision and compliance inspection (ITSCI).		●	●	●	Completed
7.16	Finding premises for the HGC.				●	Completed

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AN OVERVIEW OF THE ACTION PLAN 2013-2015

ACTION PLAN 2013-2015						
PROJ. CODE	PROJECT TITLE	Strategic Goal				IMPLEMENTATION STAGE
		SG1	SG2	SG3	SG4	
Operational Priority (OP 7): Development of the systems of organization and operation of the HGC						
7.17	Staffing of the HGC.				●	Ongoing Action Plan 2016-2019
7.18	Setting up a system for the drafting of the HGC annual activity report.				●	Completed
7.19	Setting up a Security Techniques System (ELOT EN ISO 27000).				●	Ongoing Action Plan 2016-2019
7.20	Redesigning the HGC website.	●	●	●	●	Completed
7.21	Development and management of social networks and media.	●	●	●	●	Completed
7.22	Drafting a list of accredited journalists.	●	●	●	●	Completed
7.23	Creation of a Communication Identity.	●	●	●	●	Completed
7.24	Installing signs in the HGC premises.				●	Completed
7.25	Development of best Communication Practices - Communication Tools.				●	Completed

15.1 CENTRAL GOAL OF THE ACTION PLAN 2016-2018

In contrast to the previous program, which had as an objective to create the necessary infrastructure, and focused at the same time on completing the regulatory framework for the operation and compliance inspection of games and on granting the necessary licenses and certifications, the new Action Plan has specified as its main operational objective to fully activate the inspection activities of the HGC.

The fundamental principles underlying planning, the Mission and the Vision of the HGC were formulated after having been adapted to the current requirements.

On this basis, a motto was established, which summarizes the objectives of the HGC and will from now characterize its image.

The four (4) Strategic Goals of the Action Plan 2013-2015 remain relevant and, having been reformulated in order to express their potential for fulfillment, they were adopted by the HGC to serve as guidance for the realization of the new Action Plan 2016-2018.

Finally, seven (7) Operational Priorities corresponding to an equal number of strategies for the development of the HGC's action were identified like in the previous Action Plan. The first five priorities contain the purely operational actions of the HGC (regulation, licensing, certification, compliance inspection and social protection), the sixth priority refers to its executive and administrative functions, while the seventh one includes projects to improve its operation.

15.2 MAIN CHARACTERISTICS OF THE ACTION PLAN

15.2.1 BOTTOM-UP APPROACH

The planning process was based on the widest possible participation of all service units of the HGC, which submitted the proposed projects and actions for the period 2016-2018. As opposed to other models which favor the top-down approach in planning, the bottom-up approach is considered the most appropriate method to mobilize human resources and ensure that its potential is exploited as widely as possible.

15.2.2 DURATION

It lasts three years, i.e. it covers the period 2016-2018. It was not possible to plan for longer than three years, given that the regulation and supervision of the gambling market is influenced by the prevailing political, social and economic circumstances on the one hand and by the rapid technological advances on the other hand.

15.2.3 ROLLING PLANNING

An important innovation in the Action Plan 2016-2018 is the introduction of the rolling planning concept. The basic principle underlying this type of planning is that there is no need to plan all the activities of the HGC anew, each time a programming period ends (zero-based planning).

In addition, with rolling planning new information that arises after evaluating implementation can be incorporated in the plan.

In other words, at the end of the first year of implementation (2016), the Action Plan will be reviewed and revised for the remaining two years (2017-2018) on the basis of the results that have been achieved and, at the same time, an extra year, 2019, will be added, so that the Action Plan remains a three-year plan (2017-2019).

15.2.4 PROJECT AND ACTION

When the Action Plan 2013-2015 was drafted on the basis of the knowledge and experience available at the time, the term «projects» was used both for infrastructure projects, which have a specific content and timeline for completion and for ongoing actions, i.e. a network of actions which are included in the responsibilities of the HGC and are constantly running (such as certification, inspections, etc.).

The Action Plan 2016-2018 analyzes the work of the HGC into projects and actions for reasons of clarity.

In particular, project means any endeavor whose objective is to generate a unique product or service.

In the HGC's case, these projects are mainly the drafting of regulations, manuals or studies, the development of IT systems, applications, etc. and their code contains the letter E.

Action means any task that is part of the HGC's responsibilities and consists of a series of repeated similar actions which are executed by one or more posts in a service unit. The actions developed as part of the operation of the HGC are mainly actions related to regulation and inspection and actions of an executive or administrative nature, as well as actions with regard to licensing, certification, etc., which contain the letter A in their code.

15.2.5 PROJECT AND ACTION PLANNING FORMS

Special forms were created for the planning of the individual projects and actions, in order to organize the drafting of the Action Plan 2016-2018 more efficiently. These forms have incorporated all the necessary information for a better planning of the HGC's activities and a more solid monitoring of their implementation.

15.2.6 ESTABLISHING A MEASUREMENT CULTURE - FIGURES (DATA)

Already from the first year of the Plan, the HGC established a culture of measuring the parameters that influence its work or are influenced by it. At the same time, it consolidated policies for the management and safe maintenance of its data.

ACTION PLAN 2016-2018

The mission of the HGC is to regulate, supervise and inspect gaming in order to ensure legality and fairness in gaming activities, the interests of players, minors and the public at large, and the state revenue collection process

“lawful gambling, fairness, security for all”

MISSION, VISION AND MOTTO

The mission of the HGC is to regulate, supervise and inspect gaming in order to ensure legality and fairness in gaming activities, the interests of players, minors and the public at large, and the state revenue collection process.

The HGC has a vision to make all games lawful and safe and free from negative financial, legal and social impacts.

Lawful gambling, fairness, security for all

“The HGC has a vision to make all games lawful and safe and free from any safe and free from negative financial, legal and social impacts.”

STRATEGIC GOALS

The four (4) Strategic Goals of the Action Plan 2013-2015 remain relevant and, having been reformulated in order to better express their potential, they were adopted by the HGC to serve as guidance for the the new Action Plan 2016-2018.

The Strategic Goals of the Action Plan 2016-2018 are:

STRATEGIC GOAL 1

Strengthen regulation and compliance inspection procedures so as to ensure: a) fair participation, b) transparent and fair gambling, and c) the Greek State's rights.

STRATEGIC GOAL 2

Promote further measures to protect gambling from: a) crimes committed or enabled during gambling and b) a link with the violation of the rules of public order.

STRATEGIC GOAL 3

Strengthen interventions for the protection of players, minors and the public from the damaging effects of gambling.

STRATEGIC GOAL 4

Constantly improve the organization and the method of action of the HGC.

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Strengthen interventions for the protection of players, minors and the public from the damaging effects of gambling.

STRATEGIC GOAL 4

Constantly improve the organization and the method of action of the HGC.

OPERATIONAL PRIORITIES

In the new Action Plan 2016-2018, seven (7) Operational Priorities corresponding to an equal number of strategies for the development of the HGC's action were identified like in the previous Action Plan. The first five priorities contain the purely operational actions of the HGC (regulation, licensing, certification, compliance inspection and social protection), the sixth priority refers to its executive and administrative functions, while the seventh one includes projects to improve its operation.

The Strategic Goals of the Action Plan 2016-2018 are:

OP1: DEVELOPMENT AND IMPLEMENTATION OF A STATUTORY FRAMEWORK FOR GAMING

The strategy outlined in Operational Priority 1 includes the drafting of the individual regulations for the operation and compliance inspection of gaming which make up the Gaming Regulation, by game. Setting proper and easily controllable rules and standards ensures that the permitted gaming and gambling activities are organized and carried out with due regard to the applicable laws and rules for responsible gaming, that illegal operations and profiteering are prevented, and that the interests of consumers and the public are effectively protected.

OP2: LICENSING OF GAMING OPERATIONS

The object pursued by Operational Priority 2 is to ensure that amusement games and games of chance are organized and carried out in accordance with the law, through legally authorized operators. The effective implementation of the related actions is bound to generate revenues for the HGC as well as significant additional state revenue, which is safely collectible. Such revenue will derive from operating license fees, from the State's share of the GGR, from taxation on players' winnings as well as from the increase in the license holders' taxable income, in accordance with the applicable laws.

OP3: CERTIFICATES FOR ORGANIZING GAMES

Operational Priority 3 includes actions which ensure that games of chance and amusement games played on gaming machines, as well as those operated by casinos are organized and operated in accordance with the law. This is achieved by having only certified games, gaming machines and premises and by certifying the manufacturers, importers and technicians of such games. The implementation of the actions falling under this priority generates revenue for the HGC (certification duties and stamp duties), as laid down in the applicable law, which is used to cover the relevant administrative costs.

OP4: DEVELOPMENT AND OPERATION OF A COMPLIANCE INSPECTION MECHANISM FOR THE GAMING MARKET

Operational Priority 4 reflects the strategy which is the main focus of the Action Plan 2016-2018. This strategy intends to encourage compliance of the gaming market with the applicable law. The HGC does not have as its main goal and priority to impose sanctions. This goal will be achieved by monitoring and inspecting compliance of games and their operators, and by ensuring that the

rules on commercial communication are observed. Compliance inspection will be continuous and systematic and will make use of modern technological equipment and methods.

The successful implementation of the actions included in this priority will contribute to the protection of consumers and will also create the circumstances that make the business of illegal gambling an unattractive choice.

OP5: DEVELOPMENT OF ACTIONS FOR THE PROTECTION OF PLAYERS, MINORS AND THE PUBLIC.

The object pursued by Operational Priority 5 is to maintain the participation of adults in the games of chance and of minors in electronic amusement games at rational levels and to prevent the excessive waste of money. For that reason, a set of measures facilitating controls -and, if necessary, imposing restrictions- as regards the content, nature and intensity of the commercial communication used by gaming providers are implemented, in combination with mechanisms to control players' age, such as the use of personal player cards for online gambling and games of chance played on gaming machines. To effectively combat gaming addiction special studies and surveys will be carried out, along with proper educational programs and support tools for the addicted, in compliance with international standards.

OP6: EXECUTIVE AND ADMINISTRATIVE OPERATIONS.

Operational Priority 6 contains all the executive and administrative actions of the HGC, which are necessary for its operation and for supporting its main operational activities.

OP7: DEVELOPMENT-IMPROVEMENT OF THE STATUTORY FRAMEWORK FOR THE ORGANIZATION AND THE OPERATING SYSTEMS OF THE HGC.

The object pursued by Operational Priority 7 is the continuous improvement of the way the HGC operates, by expanding and modernizing the internal systems that support the operational, executive and administrative activities of the HGC.

PROJECTS AND ACTIONS

The following tables presents in detail the projects and actions of the Action Plan 2016-2018 with a timetable of implementation per Operational Priority.

ACTION PLAN 2016-2018																												
CODE	PROJECT/ACTION TITLE	SG1	SG2	SG3	SG4	2015				2016				2017				2018										
OP1: DEVELOPMENT OF A STATUTORY FRAMEWORK FOR GAMING																												
1E01	Drafting a Regulation on the operation and compliance inspection of the number game KINO operated by OPAP S.A.	●	●	●																								
1E02	Drafting a Regulation on the operation and compliance inspection of the number game 5 of 45 and 1 of 20 (JOKER)	●	●	●																								
1E03	Drafting a Regulation on the operation and compliance inspection of the number game LOTTO operated by OPAP S.A.	●	●	●																								
1E04	Drafting a Regulation on the operation and compliance inspection of the number game PROTO operated by OPAP S.A.	●	●	●																								
1E05	Drafting a Regulation on the operation and compliance inspection of the number game 5 of 35 (EXTRA 5) operated by OPAP S.A.	●	●	●																								
1E06	Drafting a Regulation on the operation and compliance inspection of the number game SUPER 3 operated by OPAP S.A.	●	●	●																								
1E07	Drafting a Regulation on the operation and compliance inspection of the betting games of pre-defined yield operated by OPAP S.A.	●	●	●																								
1E08	Drafting a Regulation on the operation and compliance inspection of the game FOOTBALL PROGNOSTICS (PROPO) operated by OPAP S.A.	●	●	●																								
1E09	Drafting a Regulation on the operation and compliance inspection of the game PROPOGOAL operated by OPAP S.A.	●	●	●																								
1E10	Drafting a Regulation on the operation and compliance inspection of the game BINGO LOTTO operated by OPAP S.A.	●	●	●																								
1E11	Drafting a new Regulation on the operation and compliance inspection of casino gaming	●	●	●																								
1E13	Drafting a Technical Regulation on Mutual Betting on Horse Racing.	●	●	●																								
1E14	Drafting a Regulation on the operation and compliance inspection of online gambling	●	●	●																								
1E15	Drafting a Regulation on the operation and compliance inspection of gambling on broadcast and telecommunications media.	●	●	●																								
1E16	Drafting a Regulation on the agents of OPAP S.A.	●	●	●																								
1E17	Drafting a Regulation on the implementation of measures by casino enterprises to fight money laundering and terrorist financing in gambling.	●	●	●																								
1Δ01	Improvement of the regulatory framework	●	●	●																								

ACTION PLAN 2016-2018									
CODE	TITLE OF PROJECT/ACTION	SG1	SG2	SG3	SG4	2015	2016	2017	2018
OP2: LICENSING OF GAMING OPERATIONS									
2Δ01	Licensing the operation of electronic amusement games	●	●	●					
2Δ02	Examination of applications for modification of the terms of casino licenses and their operating conditions telecommunications media	●	●	●					
2Δ03	Issuance of operating licenses for gambling on broadcast and telecommunications media	●	●	●					
2Δ04	Characterization of games as involving or not involving chance	●	●	●					
OP3: ISSUING THE NECESSARY CERTIFICATES FOR ORGANIZING GAMES									
3Δ01	Certification relevant to VLT gambling	●	●	●					
3Δ02	Suitability licenses for casino gaming	●	●	●					
3Δ03	Certification of the operation of electronic amusement games	●	●	●					
3Δ04	Setting up a Register of Certifications Bodies which are accredited or recognized by the HGC.	●	●	●					
3Δ05	Supervision of the marketing of gambling equipment.	●	●	●					
OP4: DEVELOPMENT AND OPERATION OF A COMPLIANCE INSPECTION MECHANISM FOR THE GAMING MARKET									
4Δ01	Compliance inspection of exclusive rights gaming providers		●	●					
4Δ02	Inspection of the payment of financial obligations of exclusive rights gambling providers		●						
4Δ03	Inspection of adaptation of commercial communication programs of exclusive rights gambling providers		●	●					
4Δ04	Management of complaints and grievances regarding of exclusive rights gambling providers	●	●	●					
4Δ05	Evaluation and improvement of inspections that are related to of exclusive rights	●	●	●					
4Δ06	Compliance inspection of non-exclusive rights gaming providers		●	●					
4Δ07	Inspections aiming at tracking websites that provide gambling services without having a license and issuance of a black list.	●	●	●					

ACTION PLAN 2016-2018																						
CODE	PROJECT/ACTION TITLE	SG1	SG2	SG3	SG4	2015				2016				2017				2018				
OP4: DEVELOPMENT AND OPERATION OF A COMPLIANCE INSPECTION MECHANISM FOR THE GAMING MARKET																						
4Δ08	Compliance inspection of Internet service providers (ISPs) to assess compliance with the requirements for denial of access to websites that provide unauthorized gambling services		●	●																		
4Δ09	Confirmation of licensing parameters for the companies that are subject to the transitional regime of paragraph 12, article 50 of Law 4002/2011)	●		●																		
4Δ10	Supervision of gambling on broadcast or telecommunications media	●	●	●																		
4Δ11	Inspection of payment of financial obligations of non-exclusive rights gambling providers		●																			
4Δ12	Inspection of implementation of commercial communication programmes of non-exclusive rights gambling providers		●	●																		
4Δ13	Management of complaints and grievances against non-exclusive rights gambling providers	●	●	●																		
4Δ14	Evaluation and improvement of inspections of non-exclusive rights gambling providers	●	●	●																		
4Δ15	Drafting and maintenance of a Register of Beneficial Owners of gambling providers		●																			
4Δ16	Compliance inspection of licensed operators of electronic amusement games		●	●																		
4Δ17	Compliance inspection of licensed operators of electronic amusement games	●	●	●																		
4Δ18	Evaluation and improvement of inspections relating to electronic amusement games played on gaming machines	●	●	●																		
4Δ19	Drafting and maintenance of a Gaming Inspectors' Register	●	●	●																		
4Δ20	Setting up compliance inspection teams	●	●	●																		
4Δ21	Coordination and monitoring of compliance inspection teams as regards on-site inspections of casino enterprises	●	●	●																		
4E01	Drafting a manual on compliance inspection procedures	●	●																			

ACTION PLAN 2016-2018																						
CODE	PROJECT/ACTION TITLE	SG1	SG2	SG3	SG4	2015				2016				2017				2018				
OP5: DEVELOPMENT OF ACTIONS FOR THE PROTECTION OF PLAYERS, MINORS AND THE PUBLIC																						
5Δ01	Raising awareness and informing players and the public on the principles of Responsibel Gaming			●																		
5Δ02	Approval of commercial communication programs for gambling providers			●																		
5E01	Problem gambling prevalence study (PREVALENCE STUDY)			●																		
5E03	Study on the measurement and comparative evaluation of potential risks from problem gambling			●																		
5E06	Study titled “The case of casino-style online games. Game and user. (mapping out the internet & social casino gaming)”	●		●																		
OP6: EXECUTIVE AND ADMINISTRATIVE OPERATIONS																						
6Δ01	Development and expansion of partnerships				●																	
6Δ02	Communication policy management				●																	
6Δ03	Monitoring of Internal Processes				●																	
6Δ04	Analysis of External Processes				●																	
6Δ05	Human resources development				●																	
6Δ06	Fiscal management				●																	
6Δ07	Planning and implementation of security policies				●																	
6Δ08	Development and support of technological infrastructure				●																	

ACTION PLAN 2016-2018									
CODE	PROJECT/ACTION TITLE	SG1	SG2	SG3	SG4	2015	2016	2017	2018
OP7: DEVELOPMENT-IMPROVEMENT OF THE STATUTORY FRAMEWORK FOR THE ORGANIZATION AND THE OPERATION SYSTEMS OF THE HGC									
7E01	Modernizing and developing the technological infrastructure of the HGC.				●				
7E02	Strengthening security policies.				●				
7E03	Developing systems and applications to support compliance inspection.				●				
7E04	Developing systems and applications to support executive tasks.				●				
7E05	Developing systems and applications to support administrative tasks.				●				



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