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DECISIONS

Ref. 554/5/15.04.2021

Issuance of the Regulation for the implementation of measures to combat money laundering and the financing of terrorism by the Obligated Persons in the gambling market, in accordance with paragraph f' of par. 3 of Article 28 of Act No. 4002/2011 (A' 180).

THE INDEPENDENT ADMINISTRATIVE
AUTHORITY KNOWN AS THE 'GAMBLING
SUPERVISION AND CONTROL COMMISSION

Having regard to:

1. Provisions:

α. Articles 25 to 54 of Law No. 4002/2011 "Amendments to the public pension legislation - Arrangements for development and fiscal consolidation - Issues of competence of the Ministries of Finance, Culture and Tourism and Labour and Social Security" (A' 180), in particular the provision of paragraph f' of par. 3 of Article 28,

β. 4557/2018 "Prevention and suppression of money laundering and terrorist financing (implementation of Directive 2015/849/EU) and other provisions" (A' 139), as amended by Law No. 4734/2020 "Amendment of Law No. 4557/2018 (A' 139) for the prevention and suppression of money laundering and terrorist financing - Incorporation into Greek law of Directive (EU) 2018/843 (L 156) and Article 3 of Directive (EU) 2019/2177 (L 334) and other provisions" (A' 196), and in particular the provisions of paragraph f' of par. 1 and paragraphs 1(f)(b) and (c) of point (f) and (d) thereof. 3, 5, 6, 6, 7 and 8 of Article 6,

γ. of articles 16 to 23 of Law. 3229/2004 "Supervision of private insurance, supervision and control of gambling, application of International Accounting Standards and other provisions" (A' 38) and supplementing the provisions of Law No. 3051/2002 'Constitutionally guaranteed independent authorities, amendment and completion of the public sector recruitment system and related provisions' (A' 220),

d. 2206/1994 entitled "Establishment, organisation, operation, control of casinos and other provisions" (A' 62),

e. of n. 3139/2003 entitled "Arrangements for the casinos of Parnitha and Corfu and other provisions" (A' 100),

f. articles 357 to 378 of Chapter B, entitled "Licensing and operation of casinos and other provisions" of Law No. 4512/2018 "Arrangements for the implementation of the Structural Reforms of the Economic Adjustment Programme and other provisions" (A' 5),

g. 4624/2019 "Personal Data Protection Authority, measures implementing Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and transposing into national legislation Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016 and other provisions" (A' 137),

h. the Joint Decision of the Ministers of Finance and Culture and Tourism (No. 56660/1679/22.12.2011) "Certification of the opening of the Gaming Supervision and Control Commission (GSC)" (B' 2910), i.

the Joint Decision of the Ministers of Finance and Culture and Tourism (No. 2/63389/0004/21.7.2016 of the Minister of Finance 'Appointment of the Chairman and two members and renewal of the term of office of the members of the Gaming Supervision and Control Committee' (YOD 397), in conjunction with Decision

No. 2/3935/0004/24.7.2018 (YOD 428) and the Decisions under reference no. 2/3935/0004/24.7.2018 (YOD 428) and the decisions under reference no. 2/3935/0004/24.7.2018 (YOD 428). 9433 EX

2019/12.2.2019 (HOM 64), 3557 EX 2020/14.1.2020 (HOM 20) and 145940 EX 2020/21.12.2020 (HOM 1089), similar decrees of the same date.

phases,

j. of the decision of the Hellenic Republic No 129/2/7.11.2014 (B' 3162).

2. The decision of the E.E.E.P. No 129/2/7.11.2014 (B' 3162).

3. The need to harmonise the regulations for the implementation of measures to combat money laundering and the financing of terrorism by the Obligated Entities in the gambling market, with the provisions of Law No. 4557/2018 "Prevention and Suppression of Money Laundering and Terrorist Financing (incorporation of the

Directive 2015/849/EU) and other provisions" (A' 139), as amended by Law No. 4734/2020 "Amendment of Law No. 4557/2018 (A' 139) for the prevention and suppression of money laundering and the financing of terrorism; incorporation into Greek law of Directive (EU) 2018/843 (L 156) and Article 3 of Directive (EU) 2019/2177 (L 334) and other provisions" (A' 196).

4. The decision No. 544/2/04.03.2021 of the H.E.E.P. to hold a public consultation on the Draft of the above Regulation.

5. The decision No 546/1/12.03.2021 of the E.E.E.P. for the extension of the defined period for the above public consultation.

6. The comments received during the public consultation on the draft of the above Regulation.

7. The recommendation of the President of the Hellenic Republic under reference P 135 EX/13.04.2021.

8. The debate that followed.

9. The fact that this decision does not entail any expenditure to the State budget and the budget of the Hellenic Republic, we hereby decide:

The adoption of the Regulation for the implementation of measures to combat money laundering and the financing of terrorism by the Obligated Persons in the gambling market, pursuant to paragraph f' of par. 3 of Article 28 of Law No. 4002/2011 (A' 180) as follows:

REGULATION IMPLEMENTING MEASURES FOR COMBATING THE LAUNDERING OF PROCEEDS OF CRIME AND THE FINANCING OF TERRORISM BY PERSONS LIABLE FOR THE PURCHASE OF GAMBLING SERVICES.

Article 1
Definitio
ns

For the purposes of this Decision, the following phrases or words shall have the following meanings:

A Gaming Licence or Licence is the granting by the Greek State in any manner whatsoever of the right to organise and conduct gaming by the Greek State to a third party in any lawful manner, irrespective of the means, time, manner and network of provision, the means, time, the network, the means of transport, the promotion and distribution of the relevant services for the organisation and operation of Games or the transitional nature of the rights related to the organisation, operation and exploitation thereof, as well as the administrative licence issued by the E.NECP for the organisation and operation of games. An Eligibility Licence (Eligibility Licence) is the act of approving the eligibility of a person in accordance with the provisions of the Gaming Regulation on Eligibility Persons.

A Senior Manager is a manager or employee with a high hierarchical position who has sufficient knowledge of the level of exposure of the Obligor

It shall be a person exposed to the risk of money laundering and terrorist financing and shall participate in decision-making affecting it, without necessarily being a member of the Board of Directors.

The Authority is the Authority for Combating Money Laundering from Criminal Activities, pursuant to article 47 of Law No. 4557/2018 (A' 139).

Unusual Transaction is a transaction or activity that is not consistent with the commercial, business or professional conduct of the trader or beneficial owner or with their financial situation or that has no apparent purpose or motive of a financial, professional or personal nature.

An Individual Player Card (IPC) is the card of par. 4 of article 33 of Law No. 4002/2011 (A' 180).

Conduct is the conduct of a game under subsection m. 4002/2011 (A' 180). Where the provisions of this Decision provide for the concept of Conduct, the concept of Organisation shall be understood as well and vice versa.

An organisation is the organisation of a game as defined in paragraph jh' of article 25 of Law No. 4002/2011 (A' 180). Where the provisions of this Decision provide for the concept of Organisation, the concept of Conduct shall be understood as well and vice versa.

N.E.E.P. is the Gambling Supervision and Control Commission. A facility is any premises used for the organisation, conduct and/or operation of the Games or for the support thereof, regardless of whether it has been declared to the NECP by the Controlled Person or owned by a third party.

Criminal Activity is the commission of the predicate offences of Article 4 of the AML Act.

Compliance Report or Report is the set of information relating to the compliance of the Reporting Entity with its policies, controls and procedures and the assessment thereof, as defined in Article 6.

A controlled person is any person who is required to comply with the Regulatory Framework.

An audit is an on-site, remote and/or covert audit carried out in accordance with the Audit Mandate, in order to determine the Auditee's compliance with the Regulatory Framework, in accordance with a methodologically standardised and documented procedure.

Business Relationship is a business, professional or commercial relationship which is related to the professional activities of the Obligated Persons and which is expected, at the time it is entered into, to have a duration. Indicatively, the opening of a Player's E-account, the issuance of a Player's Individual Card, the conclusion of a contract with entities to join the Physical Network constitute a Business Relationship for the Obligated Persons.

A Casino Business is any person holding a casino licence, including a casino on board a ship under par. 2 of article 4 of Law No. 2206/1994 (A' 62). Electronic Player's Account (EAP) is the account referred to in paragraph o' of Article 25 of Law No. 4002/2011 (A' 180). Wherever the provisions of the Regulations refer to the Electronic Player Account, the Player's Individual Card shall be understood as well and vice versa, unless otherwise

is expressly mentioned in the Regulation.

The Regulation is this Decision.

The Gaming Regulations are the decisions issued under the authority of par. 3 of Article 29 of Law 29. 4002/2011 (A' 180) and the relevant directives of the Hellenic Gaming Authority (E.E.E.P.) related to their implementation.

A Licence Holder or Holder is a person who provides the services of a Gaming Operator and to whom a Licence has been granted.

An Audit Team is an Audit body composed of Members of the College of Gaming Auditors, appointed by decision of the President of the N.E.C.P., to carry out a specific Audit or audit task.

Other Internet games are casino games of chance, poker and its variants, provided over the Internet and conducted either live or using a Random Number Generator, in accordance with case kb' of article 25 of Law no. 4002/2011 (A' 180).

Means of Payment means a Money Transfer, debit card, credit card, credit card, prepaid card, e-wallet, personalised device, cash and any other means used by the Player to deposit and withdraw funds during the conduct of the Games, in accordance with the applicable provisions.

A Money Transfer is any transaction carried out, at least in part by electronic means, by a Payment Service Provider for the account of a payer, for the purpose of making funds available to a payee through a Payment Service Provider, regardless of whether the Payment Service Provider of the payer and the payee are the same person, including: a) credit transfers, b) direct debit, c) remittance services as defined in Law No. 4537/2018 (A' 84), as well as (d) the transfer carried out using a payment card, any type of electronic money or any other personalised device with similar characteristics and functionality, in accordance with the applicable provisions.

Non-cooperative states are countries and jurisdictions that are the provisions of par. 3 of Article 65 of Law No. 4172/2013 (A' 167) and the countries of par. 3 of Annex II of the AML Law.

AML Law is the law. 4557/2018 "Prevention and Suppression of Money Laundering and Terrorist Financing (incorporation of Directive 2015/849/EU) and other provisions" (A' 139).

Instructions are the circular instructions issued by the N.E.E.P. that specify the application of the provisions of the Gaming Regulations and this Agreement. The Directives shall have binding force in the context of the relations between the European Gaming Authority and the operators.

A Player is the natural person who participates in the Game.

Playing Activity is the set of elements related to the Player's Participation in Gambling.

A Payment Service Provider is a credit or payment institution or electronic money institution legally established and operating in Greece or in another member state of the European Union or the European Economic Area, in accordance with the applicable provisions, including its certified representatives or branches.

Politically Exposed Persons are the persons defined in par. 9 of Article 3 of the AML Law. Beneficial Owner is the natural person who ultimately owns or controls the Obligated Person, or the natural person for whose account the transaction or activity is carried out, in accordance with the provisions of Par. 17 of the Article 3 of the AML Law.

An Agent is the person who operates the OPAP S.A.'s Agencies, in accordance with the provisions of Law no. 2843/2000 (A' 219) and Law No. 4002/2011 (A' 180).

Personnel are the natural persons connected to the Obligated Person or entities of the Physical Network by any employment or work relationship related to the organisation and operation of Games of Chance.

The Regulatory Framework is the set of legislative and regulatory provisions, the Hellenic Gaming Commission's Directives, the terms of the Licences, as well as the terms of the Agreements relevant to the Hellenic Gaming Commission's responsibilities, which define and specify the conditions for the organisation and conduct of gambling in the Greek territory.

The Gaming Control Board (GAC) or the Board is the Gaming Control Board under Article 18 of Law No. 3229/2004 (A' 38).

Participation is the registration of the Player's details/entries in any Game of Chance and the validation thereof upon payment of a fee.

Identification is the process followed by the Obligated Person in order to verify the identity of the Player, including the use of the user's personalised security credentials.

Games of Chance or Games of Chance are games that are classified as games of chance according to the applicable regulations and are permitted by law to be conducted.

A Compliance Officer is the person designated by the Obligated Person as responsible for combating money laundering and the financing of criminal activities.

terrorism designated in that capacity by the Obligated Person in accordance with Article 4 and shall perform the tasks set out in Article 5.

A suspicious transaction or activity is one for which there are strong indications or suspicions of an attempt to commit or the commission of the offences under Article 2 of the AML Law or the involvement of the Player or the Beneficial Owner in criminal activities, based on the assessment of the evidence of the Playing Activity and the Player, such as the nature of the Gaming Activity, the category of the Payment Instrument, the frequency, complexity and amount of the transaction, the use or nonuse of cash, occupation, financial standing, transactional behavior, reputation, past record and other factors relevant to the characterization of the transaction.

A Person liable is the person who organizes or conducts Gambling in the Greek Territory including the Physical Network, as well as the Casino Businesses.

The Physical Network is the Agencies of OPAP S.A., the ground venues of the mutual horse racing betting (lottery or not), the ground venues of the State Lottery Games, the wholesale and retail sellers of the State Lotteries and the Beneficiaries of all the above.

Article 2

Purpose - Object - Scope - Scope

2.1. The purpose and scope of this document is to establish and implement measures for the prevention and suppression of money laundering and terrorist financing by the Persons liable in the gambling market.

2.2. The provisions of this article shall apply to the obligated Persons and their Personnel, as well as to persons who are obliged to hold a Suitability Licence in accordance with the provisions of articles 5 and 7 of Ministerial Decree 79305 EX 2020 "Gaming Regulation on the Suitability of Persons" (B' 3262).

2.3 The provisions of the present shall apply to Licence Holders, upon the commencement of the conduct of Gambling, in accordance with the Gambling Regulations and the applicable provisions.

2.4 More specific obligations relating to the certification and verification of the identity of the Players by the Obligated Persons, as provided for in the provisions of the Gaming Regulation of par. 3 of article 29 of Act No. 4002/2011 (A' 180) are not affected by the provisions of this Decision.

Article 3

Obligations of Obligated Persons

3.1. The Obligated Persons have the following liabilities:

α. Design and implement policies, procedures and controls to effectively identify, mitigate and manage risks

money laundering and terrorist financing in the field of gambling. To this end, they shall take into account factors such as the Gaming Activity in conjunction with the profile of the Player, the type of Game being played, the technical means and materials used, the distribution network of the relevant services, the structure, organisation and limits of permitted transactions, the countries or jurisdictions related to the participation, organisation and conduct of the Games, the distribution network. The Obligated Persons shall document and update their risk analysis and policies and make them available to the NRA at the time and in the manner prescribed by the Authority.

β. Have appropriate risk management systems in place and apply procedures, commensurate with the degree of risk, to determine whether the Player belongs to the category of Politically Exposed Persons or the Player is a national of a country designated by the European Commission as a high risk country for money laundering and terrorist financing or belongs to the Non-Cooperative States.

γ. Evaluate and redefine policies, controls and procedures on an ongoing basis, taking into account the recommendations of the Authority, the NEC and other competent authorities, the findings of internal audits and the Article 6 Report, as well as developments in the relevant field.

δ. Implement due diligence measures, in accordance with Articles 7 and 8, with respect to the Player and the Beneficial Owner of the entities that make up their Physical Network and ensure that their data is verified and updated by an independent and reliable source.

ε. Exercise ongoing oversight of the Player's transactions and activity within and during the course of the Business Relationship and ensure that these are consistent with their knowledge and risk profile of each Player.

φ. Appoint a Compliance Officer in accordance with Article 4, provide him/her with the necessary resources for the performance of his/her duties, training and training and ensure full and unhindered access to the relevant data.

χ. Ensure that the Compliance Officer acts independently and does not take instructions in the performance of his/her duties. Where they delegate other duties and obligations to the Compliance Officer, they shall ensure that such delegation does not constitute a conflict of interest with the duties and obligations of the Compliance Officer under the AML Law and the Rules.

η. Establish and operate an independent internal audit department to ascertain the implementation of internal policies, preventive controls and procedures and compliance with the provisions of the AML Act and the Regulations.

θ. Ensure the design and implementation of methods and procedures to monitor the suitability of their Personnel.

ι. Ensure the education and training of their employees and associates whose responsibilities and duties are related to the fight against money laundering and the financing of terrorism in the field of gambling.

ια. Establish procedures that allow employees and their associates to report violations internally, through a dedicated, independent and anonymous channel, commensurate with the nature and size of the Obligated Person concerned, and take the necessary measures to protect the reporting persons in accordance with their obligations under Article 26 of the AML Law.

ι. Investigate with due diligence and assess the merits of any complaint, whether anonymous or not, that comes to their attention regarding matters relating to the conduct of Suspicious or Unusual Transactions for specific Players, as well as third parties associated or allegedly associated with such Players.

μ. Submit a report to the Authority without delay when they know or have serious indications or suspicions that funds, regardless of their amount, constitute the proceeds of criminal activities or are related to the financing of terrorism. This obligation also applies to any case of attempted suspicious transaction.

ν. Provide the Authority, the NCA and other public authorities responsible for combating money laundering or terrorist financing, upon request, with all the information and data required.

ο. They must refrain from carrying out transactions, which they know or have serious indications or suspicions that they are related to the products of criminal activities or connected to the financing of terrorism, before completing the necessary actions under point a' of par. 1 of Article 22 of the AML Law and comply with the instructions of the Authority. Where it is impossible or likely to hinder the prosecution efforts of such beneficiaries to avoid carrying out the above transactions, they shall inform the Authority immediately after the transaction.

π. Keep records and data in paper and/or electronic form, in accordance with Article 11.

ρ. Process the Player's personal data for the purpose of preventing money laundering and the financing of terrorism, in accordance with Article 31 of the AML Law.

3.2. The Obligated Persons belonging to a group, in addition to the obligations under par. 3.1, shall also be subject to the obligations of Articles 36 and 38 of the AML Law.

Article 4

Compliance Officer

4.1 The Obligated Person shall appoint a Compliance Officer who has the necessary qualifications and skills to carry out the tasks set out in Article 5.

4.2 In the case of a group involving more than one Obligated Person, a group-level Compliance Officer coordinator is also appointed. In this case the coordinating Compliance Officer shall coordinate the activities of the Compliance Officers of all the Obligated Persons in the group and exchange relevant information with them, where appropriate. Where a Compliance Officer is appointed at group level, the provisions of Articles 36 and 38 of the AML Law shall apply.

4.3 The person that the Obligated Person chooses to appoint as Compliance Officer must have already received, prior to his/her appointment, the relevant Suitability Licence from the Hellenic National Audit Office, in accordance with the provisions of the decision of the Minister of Finance "Adoption of the Regulation on the Suitability of Persons" (B' 3262), under reference 79305 EX 2020.

4.4 The Obligated Person shall promptly notify the NECP of the decision to appoint the Compliance Officer.

4.5 If for any reason the Compliance Officer ceases to exist or must be replaced, the relevant provisions of the decision of the Minister of Finance under item 79305 EX 2020 shall apply.

"Adoption of the Gaming Regulation on the Fitness of Persons" (V' 3262).

4.6 In the event that the Compliance Officer does not know the Greek language, the Obligated Party must appoint a representative to communicate with the E.E.E.P. and the competent authorities, in the context of the application of the AML Law and the Regulation.

Article 5

Duties of the Compliance Officer

The Compliance Officer shall exercise the following functions:

α. Identify and analyse the risks related to money laundering and terrorist financing in relation to factors such as the structure, nature and specific rules of the game, the profile of the Players, the Playing Activity, the type, frequency, value, methods and means of the transactions carried out, the countries or geographical areas of origin/destination of the players, the distribution network of the services provided, the expected origin and destination of the funds, etc.

β. Design and coordinate policies and procedures to prevent, manage and mitigate the identified risks and ensure that the extent of the measures implemented by the Obligated Person, where applicable, is proportionate to the risks of committing

money laundering and terrorist financing offences. c.

Monitor the policies, procedures, measures and workflows in place, ensure that they are consistently applied, evaluate their effectiveness and recommend to the management of the Obligated Person the adjustment of the policies, procedures, workflows and measures and the taking of the necessary corrective actions, taking into account the suggestions of the Authority, the Hellenic Republic and the other competent authorities, as well as developments in the relevant sector.

d. Gathers and analyses information on transactions and Playing Activity and establishes and categorises transactional and playing patterns.

e. Establishes appropriate channels for the flow of information and the management of complaints and reports on matters relating to the fight against money laundering and the financing of terrorism and ensures that the Obligated Person takes and implements the necessary measures to protect the persons concerned in accordance with Article 26 of the AML Law.

f. Collect, examine, cross-check and evaluate the information received on the conduct or attempted conduct or indications of suspicious or irregular transactions or activities, in accordance with the corporate policies, and keep a record thereof.

ζ. It shall inform the Authority without delay, on its own initiative, when it knows or has serious indications or suspicions that the transactions carried out or attempted, regardless of their amount, constitute proceeds of criminal activities or are related to the financing of terrorism, submitting a full and detailed report. This obligation also applies to any attempted suspicious transaction. In the case of a report, it shall act as the first point of contact with the Authority both at the start and throughout the investigation of the case and shall respond to all questions and requests for clarification, cooperating fully with the Authority.

h. Provide the Authority, the NCA and other public authorities responsible for combating money laundering or the financing of terrorism, at their request and without delay, with all the information they require. the information and data required.

θ. If, following the evaluation of the information, the Compliance Officer considers that there is no need to make a report, he or she shall close the case, giving reasons.

ι. Submit the Compliance Report of Article 6 to the E.E.E.P. and to the Management of the Subject.

ια. In the case of an application by the Player for the issuance by the Obligated Person of a certificate or a profit certificate under Article 16, it shall verify the transactions carried out with the Player concerning

in the period covered by the requested certificate or attestation and documents that they are not related, directly or indirectly, to money laundering or terrorist financing. Where it has indications to the contrary, it may decide not to grant the certificate or profit certificate and shall submit a report to the Authority.

ι. Recommends to the Obligated Person and ensures the implementation of training and education programmes for staff in the fight against money laundering and the financing of terrorism.

μ. He is responsible for the communication of the Obligated Person with the Hellenic National Research Council, the Authority and other relevant authorities on matters relating to his responsibilities.

ν. In the case of a group, cooperate and exchange information with the coordinating Compliance Officer and the Compliance Officers of the other Obligated Persons in the group.

Article 6

Compliance Report

6.1 The Compliance Officer submits to the Obligated Person and the E.E.P. a Compliance Report in accordance with the provisions of the AML Law and the Regulation, by the 15th of July for the first half of each year and by the 15th of January of the following year for the whole of the preceding year, irrespective of the time of his/her appointment or the time the Obligated Person commences business activity in Greece. The report shall include detailed information on at least the following:

α. The due diligence measures, policies and procedures implemented.

β. The audits carried out and the evaluation of the relevant results.

γ. The deficiencies and weaknesses found in the procedures for the identification and evaluation of Suspicious and Unusual Transactions, the reports/recommendations that may have been submitted for the taking of administrative measures and the relevant actions taken by the Obligated Person.

δ. The number of Players whose details have not been verified and the amounts paid by such Players for their participation in the Games.

ε. The number of transactions that were not executed or were permanently discontinued due to non-compliance of the Players with the due diligence requirements.

ς. The number of High Risk Players who have carried out transactions, based on the criteria for inclusion of Players in this category, as well as the amount of such transactions.

ζ. The number of cases checked and filed, with an indication of the reasons for their filing.

η. The trainings and briefings attended by the Compliance Officer and their content.

θ. The number and content of the training programmes organised, the number and nature of the Staff members who attended them, the measures taken to inform the Staff on the AML Law and the Regulation and the evaluation of the results of these programmes.

6.2 The management of the Obligated Entity shall evaluate the Report and submit its views on it to the Hellenic Republic within forty-five (45) days of its submission.

6.3 A Directive of the NECP may update and/or add further content to the Report of this Article and regulate any other specific details for the application of this Article.

Article 7

Due diligence measures

7.1 In order to comply with the requirements of the Rules, the Obligated Persons shall apply both ordinary and enhanced due diligence measures, as appropriate.

7.2 Normal due diligence measures include the following:

α. The certification and verification of the Player's identity based on documents, data or information from reliable and independent sources, at the time specified in the Regulation, including, where available, electronic means of identification, the relevant trust services, as provided for in Regulation (EU) 910/2014 of the European Parliament and of the Council of 23 July 2014 and in Article 49 of the Digital Governance Code of Law No. 4727/2020 (A' 184).

β. Verification of the Player's identity as to whether the Player is a national of a country that has been identified by the European Commission as a high risk country for money laundering and terrorist financing or belongs to the Non-Cooperative States, or if he/she is included in the relevant lists of the Authority, the competent police, administrative and judicial authorities, where such lists exist and are accessible by the Obligated Persons, as well as in the relevant registers of the European Commission on restrictive measures.N.E.P.C.

γ. Verifying the identity of the player and confirming that the player is not a Politically Exposed Person. In the event that it is determined that the Player is a Politically Exposed Person, the relevant provisions of Paragraph. 8.10 of the Rules.

δ. The verification and/or updating of the Player's data, in the event that the Obligated Person discovers either a change in the data, or lack of information/data about a Player, or the execution of a significant transaction in accordance with the foreseen

the Regulation, or a change in the transactional behaviour and/or the Playing Activity. e. Ensuring that payments of winnings above the limits set out in the Regulation are made only through Payment Service Providers, following certification and verification of the Player's identity and verification of the Player's identity.

f. The issuance of a profit certificate or a certificate profits, in accordance with the conditions and procedures laid down in the Regulation.

ζ. The refusal to provide services, to pay winnings, to issue a certificate or a certificate of winnings, in case the conditions for the identification and verification of the Player's identity have not been met, as well as in case they know or have serious indications or suspicions that the Player is pursuing the money laundering of proceeds from criminal activity or the financing of terrorism through his Gaming Activity.

7.3 The enhanced due diligence measures include the following:

α. The collection of additional information about the Player, the origin of funds and the source of wealth.

β. Approval by a Senior Executive Officer for the commencement or continuation of the Business Relationship with the Player.

γ. Strengthening the supervision of the Business Relationship, by thoroughly examining the Gaming Activity and the transactions carried out during it and increasing the number and regularity of controls, in order to ensure that the transactions are consistent with the knowledge of the Obligated Person about the Player, his professional activities, his trading and gaming patterns, the technical and payment instruments he uses and his risk profile in general.

δ. The adoption and implementation of strong identification methods, to the extent technically feasible.

Article 8

Application of due diligence measures by the Obligated Persons

8.1. The Obligated Persons shall apply the due diligence measures in a consistent and systematic manner, in accordance with the provisions of the AML Law and this Article, taking into account the risk of money laundering and terrorist financing.

8.2. The Obligated Persons shall assess the degree of risk of money laundering or terrorist financing, based on the information and data available to them about the Player, the Player's trading and gaming activity, the typology of Suspicious or Unusual Transactions in the field of Gambling as set out in Annex III of the Regulation and taking into account the

taking into account the potentially higher risk factors in Annex II of the AML Act.

8.3. Depending on the degree of risk, the Obligated Persons shall apply the due diligence measures set out in Article 7 appropriate to the case or enhance the degree, intensity and scope of measures already in place and/or introduce additional measures, adjusting the way in which transactions and Gaming Activity are monitored accordingly.

8.4. Due diligence measures may be applied in all phases and stages of the Obligated Person's transactions with the Player (deposit, participation, credit, withdrawal of winnings).

8.5. The measures apply to both new and existing Players, at the appropriate time depending on the risk and in any case where there are doubts about the accuracy and completeness of the information provided by the Player or where information relating to the Player changes or where the Obligated Person has an obligation to contact the Player in order to update the information relating to the Player.

8.6. Any restrictions, prohibitions or denial of transactions imposed by the Obligated Person on the Player must be implemented as soon as possible and in any event within a reasonable time sufficient to demonstrate that the Obligated Person took appropriate measures in a timely manner.

8.7. The Obligated Persons shall ensure that they are able at all times to justify and demonstrate to the NEEP and any relevant authority that the type and extent of the measures taken are proportionate to the risk and that they apply those measures consistently and effectively.

8.8. The Obligated Persons shall apply appropriate due diligence measures, adjusting the intensity and scope of the measures to the degree of risk and based on the corporate policies, information and procedures they develop and implement, irrespective of the transactional limits set out in the Regulation.

8.9. Obligated Persons shall enhance the intensity and extent of due diligence measures, taking into account the risk, based on the Gaming Activity and in combination with the Player's profile and other information already available to them, when:

a. A transaction of two thousand (2,000) euros or more is carried out during the Participation in a Game of Chance, the collection of winnings or both, regardless of whether the transaction is carried out in a single operation or in several operations that appear to be linked to each other. The concept of transaction includes any act of purchase or redemption of coupons, tokens and tokens and Transfer of Funds. The fulfilment of the above thresholds is calculated on the basis of a playing day, which in turn, for the purposes of the Regulation, is calculated on the basis of the opening hours of the gaming day.

of the Obligated Person and the Natural Network. In order for the Obligated Person to determine whether a Player has met the above limit, the Obligated Person shall not take into account any winnings which the Player has not received or which have not been withdrawn from his/her Electronic Account and which he/she reinvests for his/her participation in the Games (recycled winnings). In any case, the Obligated Person must demonstrate that it applies methods, procedures and practices that enable it to determine in a systematic and, as far as possible, objective manner, its efforts not to exceed the above limit through multiple transactions.

β. The Playing Activity and the related patterns of the Player are significantly differentiated and are not in accordance with the Player's transactional profile and/or his or her objectively determined financial capabilities, on the basis of the information and intelligence available to the Obligated Person about the Player or the Player engages in practices which, based on the typology of Suspicious or Fraudulent Transactions in Annex III and/or common knowledge and experience, are related to the attempt to launder proceeds of crime or finance terrorism through Gambling.

8.10. The Obligated Persons shall apply appropriate due diligence measures in each case where:

a. Know or have indications, information or evidence that a Fraudulent or Unusual Transaction is being or is attempting to be carried out.

β. They know or have evidence, information or evidence that:

aa. the Player participates in the Games as a surrogate person within the meaning of par. 6 of article 32 of Law 32 of the Law. 4002/2011 (A' 180), or

bb. participation in the Game is conducted in a manner that constitutes an unfair collusion between two or more Players and/or is intended to circumvent the rules of the Game and/or to manipulate the outcome of the Game; or

cc. there is influence by the Player or his relatives or persons closely related to him on the determination of the outcome of an event offered for wagering or the fairness of the wagering event is questioned by reliable third party sources, or

dd. the Player has carried out or attempts to carry out a Transfer of Funds to third parties, legal or natural persons and/or uses Payment Instruments belonging to third parties.

dd. the Player has taken or attempts to take actions to transfer funds to third parties, legal or natural persons and/or uses Payment Instruments belonging to third parties.

c. The Player is a national of a country that has been identified by the European Commission as a high risk country for money laundering.

and terrorist financing or belongs to Non-Cooperative States. The additional measures taken in such cases include, in particular, the identification and verification of the Player's identity on the basis of documents, data or information from a reliable and independent source, including, where available, electronic identification means, the relevant trust services, as provided for in Regulation (EU) 910/2014 of the European Parliament and of the Council of 23 July 2014 and in Article 49 of the Digital Governance Code of Law No. 4727/2020 (A' 184).

δ. The Player is a Politically Exposed Person as defined in the provisions of the AML Law. In the event that the Player ceases to be a Politically Exposed Person, the Obligated Persons are required to take into account, for a period of at least one (1) year from the cessation of such status, the risk that such person continues to pose and to implement appropriate measures until they determine that such person no longer poses the risk that is specific to such persons.

ε. The Player is registered on the list of unlicensed providers in paragraph. 7 of Article 48 of Law 48 of the Law. 4002/2011 (A' 180).

φ. The Player requests the conclusion of a written agreement in order for the Obligated Person to accept a Participation in the Betting Game, the expected winnings of which exceed the maximum monetary amount of winnings per bet in accordance with the provisions of the decision of the Minister of Finance under item 79835 EX 2020/24.7.2020 (B' 3265).

ζ. In the case of Casino Businesses, the Player requests the Obligated Person to provide the means of financing the Participation, pursuant to the provisions of par. 26 of Article 378 of Law 378. 4512/2018 (A' 5).

8.11. With the exception of Games conducted by Casino Establishments, in specific cases where the risk of money laundering or terrorist financing is demonstrably low, certain Games and/or categories of Games may be exempted from some or all of the requirements of the Regulation by a decision of the NECP notified to the European Commission. Such exemptions must be justified on the basis of a specific risk assessment that considers factors relevant to the Games in question, including, but not limited to, the average consumer expenditure for participation, the number, amount and frequency of prizes awarded per category of winnings, the rules of the game, the method of determining the result, the distribution network of the relevant services, the means of payment, the vulnerability of the transactions involved, etc. The assessment takes into account relevant findings of the reports produced by the European Commission in the context of the supra-regional risk assessment.

8.12 If the Obligated Person determines that it cannot apply due diligence measures appropriate to the case, it must refuse to enter into a transaction, does not enter into a Business Relationship or terminates it permanently and considers whether a reporting obligation to the Authority applies. The above provision does not prevent the Obligated Person from taking steps to create a temporary Player's Electronic Account in accordance with the provisions of Article 13 of the Regulation.

Article 9

Application of due diligence measures by third parties

9.1 The Obligated Persons may rely on third parties for the authentication and verification of the Player's identity, the collection of information and the evaluation of transactions, in accordance with the provisions of Article 19 of the AML Law. The responsibility for the fulfilment of these obligations remains with the Obligated Person.

9.2 For the purposes of this Article, only credit institutions and electronic money institutions which, in the context of their Business Relationship with the Player, have already implemented the required due diligence measures in relation to the Player, shall be considered as acceptable third parties.

9.3 Obligated Persons relying on a third party shall ensure that:

α. Obtain from the third party any information that the third party obtains about the Player by applying due diligence measures in relation to the Player.

β. The third parties shall transmit without delay, in paper or electronic form, at the request of the Obligated Person, the documents and data of the verification, validation and verification of the Player's identity, including, if available, electronic means of identification, relevant trust services, as provided for in Regulation (EU) 910/2014 of the European Parliament and of the Council of 23 July 2014 and in Article 49 of the Digital Governance Code of Law No. 4727/2020 (A' 184) or any other secure, remote or electronic, identification procedure obtained by the third party in the application of due diligence measures.

9.4 In the event that the third party's Business Relationship with the Player is terminated for any reason, the Obligated Person shall itself verify the identity of the third party and apply the appropriate due diligence measures referred to in Article 8.

Article 10

Submission of reports - Prohibition of disclosure

10.1. Obligated Persons shall report without delay to the Authority where they know or have serious indications or suspicions that funds, irrespective of the amount of money

of their amount, constitute proceeds of crime or are related to the financing of terrorism. This obligation also applies to any attempted suspicious transaction.

10.2. An indicative typology of Unusual or Suspicious Transactions is included in Annex III of the Regulation.

10.3. The Obligated Persons, their Personnel, and any third party who is in a position to know because of his/her relationship with the Obligated Person, are prohibited from disclosing, to the involved Player or to third parties, that information has been or will be transmitted or requested or that an investigation is being or will be conducted into the commission of AML offences. The exchange of information on Suspicious or Unusual Transactions between Obligated Persons belonging to the same group and established in Greece, or in another member state of the European Union or in a third country that imposes obligations at least equivalent to those of the AML Law is permitted.

10.4. Where the Obligated Person refuses to carry out the transaction or decides to terminate the relationship with the Player, it shall take all possible measures to ensure that the Player is not informed that the reason for refusing the transaction or terminating the relationship is that it knows or has serious indications or suspicions that Suspicious or Unusual Transactions have been carried out or attempted.

Article 11 Record keeping

11.1. The Obligated Persons must keep, in paper and/or electronic form, for the purposes of prevention, detection and investigation by the Authority, the competent or other public authorities of possible money laundering or terrorist financing, at least the following:

a. the documents and information required to comply with due diligence obligations, including, where available, information obtained by electronic identification means, relevant trust services as defined in Regulation (EU) 910/2014 (L 257), or by any other secure, remote or electronic, identification procedure regulated, recognised, approved or accepted by EETT,

b. the original or copies of the documents necessary to identify the transactions carried out with the Player, including those relating to the type and amount of the transaction and the means of payment,

c. internal documents relating to approvals, decisions or recommendations on Suspicious or Irregular Transactions cases they have investigated, whether or not they have reported to the Authority,

d. the elements of the Playing Activity and patterns,

e. the details of the reports they submit to the Authority,

f. correspondence with the Players and third parties involved,

g. the details of the cases checked and placed on the file,

h. the details of the complaints and reports received,

i. statistical data reflecting the classification, categorisation and history of the parameters, the degree of risk per Player and the actions taken in relation to the above a' to h'.

11.2. In addition to the above:

a. Obligated Persons conducting Games through a Player's Electronic Account shall keep a record of Money Transfer transactions per Player, in the amount of five thousand (5,000) Euros or more per transaction.

β. Casino Enterprises shall keep a transaction register for payouts of winnings using cash in the amount of five thousand (5,000) euros or more per transaction, as well as a register of chip redemption on behalf of customers for the redemption of chips worth five thousand (5,000) euros or more per transaction.

c. The Obligated Persons conducting Gambling through the Physical Network shall keep a record of transactions for payouts of a payout of two thousand (2,000) euros or more per transaction.

11.3. Without prejudice to par. 5 of Article 30 of Law No. 4002/2011 (A' 180), the Obligated Persons shall keep the documents and data related to compliance with the requirements of the AML Law and the Regulation, in paper and/or electronic form, for a period of five (5) years from the termination, in any way, of the Business Relationship with the Player.

11.4. Upon expiry of the period for keeping the above records, the Obligated Persons shall delete the personal data, unless the storage of the data for a longer period of time, which may not exceed ten years, is required or imposed by another provision of law or regulatory decision.

11.5. The data, information and records shall be kept in a manner and in a form that enables the Obligated Person to respond fully and without delay to a request from the EEE, the Authority, or any other relevant public authority for their provision at the time specified by those authorities.

11.6. Further categories of transactions and data that the Obligated Persons are obliged to keep may be added and the monetary and time limits for keeping the data and information may be adjusted, increased or decreased, and any other specific details for the application of this article may be regulated by a Directive of the N.E.E.P.

Article 12 Processing of personal data

12.1. The processing of personal data in the application of this Regulation for the purpose of preventing money laundering from criminal activities

activities and the financing of terrorism, is considered a matter of public interest in accordance with Regulation (EU) 2016/679, Regulation (EU) 2018/1275 and Law No. 4624/2019 (A' 137).

12.2. The personal data processed by the Obligated Persons solely for the purpose of preventing money laundering and terrorist financing in accordance with the AML and the Regulation may not be used or processed for other purposes, unless this is necessary for the Obligated Persons to comply with their obligations under the provisions of the Gaming Regulation and the relevant provisions of the relevant provisions of the Gaming Act and the relevant provisions of the Regulation.

12.3. The Obligated Persons shall provide prospective customers with the information required in accordance with Article 13 of Regulation (EU) 2016/679, in which they provide general information on the obligations of the Obligated Persons, in accordance with the AML Law and the Regulation, to process personal data for the purpose of preventing money laundering and the financing of terrorism.

12.4. In application of the prohibition of disclosure provided for in par. 10.3, the restriction, in whole or in part, of the data subject's right of access to the personal data concerning him or her is permitted in cases where the Data Subjects, the Authority, the E.E.E.P., other competent authorities and the data controllers of the above-mentioned, in the performance of their duties for the purposes of this Regulation, in such a way as not to hamper the conduct of investigations, analyses or proceedings and to ensure that the prevention, investigation and detection of money laundering and terrorist financing are not compromised, in accordance with the provisions of paragraph 1. 1 of Article 31 and paragraph 1 of Article 31. 1 of Article 32 of Law No. 4624/2019 (A' 137).

Article 13

Authentication and verification of the identity of the Player of games of chance conducted through an Online Player Account

13.1. Obligated Persons conducting Gambling through a Player's Electronic Account shall verify and authenticate the identity of each new Player as follows:

α. Certify and verify the identity of the Player, in accordance with the provisions of the Regulations and ensure that the Player is the person he/she claims to be. An indicative list of verification methods is described in Annex I attached to the Rules and is an integral part thereof. In case of doubt as to the adequacy of the information provided by the

concerning the identity of the Player, request further evidence.

β. Create and maintain, exclusively, Electronic Player Accounts, where the Player's full name and surname is displayed in accordance with the identification documents.

γ. Only natural persons acting in their own name and on their own account and provided that the details declared in the application are identical to those of the identity card or passport or other equivalent document are registered as Players.

13.2. The collection of the necessary data and documentation for the authentication and verification of a new Player's identity is carried out within thirty (30) days from the creation of the Player's E-Account. Until the expiry of the above deadline, the Account is temporary.

13.3. If the time limit in par. 13.2 and the Player's identity has not been verified, the Obligated Persons:

α. Place the Electronic Account in "Blocked" status and cease to accept transactions with the Player.

β. Inform the Player of the status of his/her Electronic Account in "Blocked" status and set a deadline of thirty (30) days from the date of "Blocking", in order for the Player to take the necessary actions and provide the required information for the certification and verification of his/her identity. Once the Player has provided the requested information, they activate the Electronic Account and finalise the Business Relationship. If the above deadline expires without action or if the information provided is still insufficient, they shall close the E-account and terminate the Business Relationship.

13.4. For the period of time that the Player's Electronic Account is temporary in accordance with par. 13.2, the Obligated Persons:

α. Allow deposits by the Player in his Electronic Account of up to eight hundred (800) euros, whether this amount is covered by one transaction or by several transactions.

β. Allow the Player to participate in bets on events scheduled to take place up to the end of the 30th day from the day of creation of his/her E-Account or in online games conducted within the same period. Bets on events postponed until after the 30th day from the day of creation of the E-account are settled at odds per unit.

γ. credit the Player's Electronic Account with the winnings resulting from the Player's participation in the Games.

δ. Not allow the Player to withdraw deposits and winnings credited to the Player's Electronic Account.

13.5. For the period of time that the Player's Electronic Account is in a "Blocked" status according to par. 13.3, the Obligated Persons do not allow Participation and any operation of Transfer of Funds to and from the Player's Electronic Account.

13.6. If the Player's Electronic Account is closed in accordance with par. 13.3, the Obligated Persons shall re-settle the Participations that have yielded winnings to the Player, throughout the time the Account was of a temporary nature, by reimbursing the unit, pay to the Player, subject to paragraph d) of par. 13.7, the balance of the capital credited to the Electronic Account in accordance with the provisions of paragraph 13.7. 2 of article 21 of the decision of the Minister of Finance under item 79835 EX 2020/24.7.2020 (B' 3265), and shall examine whether the reason for reporting to the Authority exists. Participations that have not yielded profits will not be returned.

13.7. Throughout the duration of the Business, the Obligated Persons conducting Games via a Player's Electronic Account shall ensure that: a. No credits are transferred between Electronic player's electronic player accounts.

β. Transfers of Funds to and from the Player's Electronic Account must be made through the Payment Service Providers.

c. Deposits in the Player's Electronic Account in the amount of five thousand (5,000) euros or more per transaction are accepted and used for the execution of Participations only upon confirmation that the payment account declared by the Player actually belongs to the Player.

δ. Withdrawals to Players, of eight hundred (800) euros or more per transaction, will only be made if it is confirmed, prior to the transaction, that the payment account declared by the Player actually belongs to the Player. For Player payments in the case of Gambling conducted through VLT-type gaming machines, the limits and procedures set out in Paragraph 1 shall apply. 15.1. e. They shall take all appropriate, organizational and technical measures to ensure that Transfers of Funds to and from the Player's Electronic Account are carried out by Payment Instruments owned by the Player. In the event that a Transfer of Funds is subsequently confirmed using Payment Instruments belonging to third parties, they shall prohibit the use of such Payment Instruments, return the funds deposited to the beneficiary of the Payment Instrument, shall not refund any profits resulting from the use of such Payment Instruments and shall examine whether the use of such Payment Instruments is in accordance with the rules of the Bank. there are grounds for a complaint to the Authority.

13.8. The details of the Player's payment account are verified by relevant documentation in accordance with the provisions of Section A of Annex I.

13.9. In the case of Internet Gambling, transactions are carried out exclusively with Players connected from an IP located within the Greek Territory.

Article 14

Electronic Roaming Account

14.1. An Obligated Person conducting Internet Gambling in Greece (host country) may create an Electronic Gaming Account for Players visiting Greece. Such Players must have an active electronic account with a person who:

a. holds a valid internet gambling licence issued by a competent regulatory authority of a country of the European Union, the European Economic Area, Switzerland and the United Kingdom,

b. provides internet gambling under this licence in a member state of the European Union or the European Economic Area, as well as in Switzerland and the United Kingdom (country of origin),

c. is an affiliated enterprise of the Obligated Person within the meaning of Annex A' of Law. 4308/2014 (A' 251) or holds participation rights equal to or greater than 10% of the Obligated Person.

14.2. The creation of an Electronic Roaming Account is permitted under the following conditions: a. The electronic account held by the Player with the person in the country of origin is active and is not of a temporary nature.

β. The person of the country of origin:

aa. applies due diligence measures identical or equivalent to those provided for in the Regulation with the required consistency and effectiveness, and bears the relevant responsibilities and obligations towards the competent supervisory authorities of the country of origin; bb. making available to the Obligated Person all data and information relating to the authentication and verification of the identity and due diligence measures that it has implemented for the Player in whose name it holds an electronic account and who requests the creation of an Electronic Roaming Account by the Obligated Person for the period of stay in Greece.

c. The Obligated Person and the person of the country of origin have signed and notified, without delay, to the NCP a contract under which:

aa. regulate the access of the Obligated Person to the information required for the creation of the Electronic Gaming Account in the name of a player who holds an electronic account in the person of the country of origin, his/her gaming activity, as well as any other necessary details,

bb. undertakes to provide the E.E.P. with any data or information requested by it, which it has provided to the Under- billing Person for the application of due diligence measures and for the purpose of creating the Electronic Payroll Account.

δ. The Player has consented to the processing of his/her personal data and information concerning him/her for the purposes of creation,

the operation and management of the Electronic Traveller's Account by both the Obligated Person and the person in the country of origin.

14.3. For the creation of the Electronic Account, the Player submits an application to the Obligated Person, which serves as a solemn declaration in accordance with par. 4 of Article 8 of Law No. 1599/1986 (A' 75), that all the information contained therein and those accompanying it are true. The application must be accompanied by at least the following:

α. Full details of the Player's identity (Name, First Name, Nationality, Gender, Date of Birth, Place of Birth).

β. A passport number which must be issued by the competent authorities of the country in which the Player has permanent residence or a social security number in the country of permanent residence or other identification of equivalent validity under the law of the country of origin.

c. Full address of permanent residence.

δ. Address of temporary residence in Greece. e. Date of arrival in Greece.

f. The country from which it enters Greece. g.

Gate of entry into Greece.

η. Mobile phone.

θ. Any other information or documentary evidence requested by the Obligated Person in order to authenticate and verify the identity of the Player.

14.4. The Obligated Person shall cross-check the above information with the information held on the Player by the person in the country of origin and verify that:

α. The Player requesting the creation of the Electronic Roaming Account is the same person as the person who holds an electronic account in the person's country of origin.

β. The online account held by the Player with the person in the country of origin is active and not temporary.

c. The Player is not banned from playing or in any other similar situation in the country of origin.

14.5. If the above applies, the Obligated Party creates the Electronic Revenue Account for a period of thirty (30) days from the date of its creation. No Electronic Gaming Account may be created for the same Player before one hundred and eighty (180) days have elapsed since the closure of the immediately preceding, corresponding Account.

14.6. During the period of operation of the electronic routing account, the Obligated Party shall:

α. Allows the Player to participate only in games or events that are settled before the expiry of the Electronic Playing Account.

β. Allows deposits by the Player up to the amount of ten thousand (10,000) euros either in one or more transactions.

c. Accepts deposits for the execution of Participations and makes withdrawals to the Player only after confirmation that the payment account declared by the Player actually belongs to the Player. The details of the Player's payment account shall be verified by relevant documentation or otherwise in accordance with the provisions of Section A of Annex I.

δ. Upon the expiry of thirty (30) days from the day of creation of the Electronic Roaming Account, close the Electronic Roaming Account and pay any balance on the Player's payment account as soon as possible and, in any case, within three (3) business days from the day following the closure of the Electronic Roaming Account.

ε. If it knows or has serious indications or suspicions that the Player's transactions are related to the products of criminal activities or linked to the financing of terrorism, it shall not execute them before completing the necessary actions under paragraph a' of par. 1 of Article 22 of the AML Law and complies with the Authority's instructions. If avoiding the transaction is impossible or likely to impede efforts to prosecute those beneficiaries, it shall execute the transaction and immediately inform the Authority and the person in the country of origin.

14.7. The Obligated Person shall issue a Winnings Certificate to Players who have made winnings from their participation in the Electronic Lottery Games, upon the Player's request. The winning certificate shall be issued, exclusively, to Players with permanent residence abroad and shall indicate at least:

α. The Player's details and the Player's passport number.

β. The Player's social security number or other identification of equivalent validity under the law of the country of origin.

c. The information referred to in paragraph c' of par. 16.4.

14.8. The Obligated Persons have the right to refuse to issue a winning certificate to a Player who has participated in the Games with an Electronic Gaming Account when they know or have evidence, information or evidence that a Suspicious or Unusual Transaction has been or is being or is attempting to be carried out. In such a case, they shall take all possible steps to ensure that the Player is not informed of the reason for the refusal to issue the winning certificate, inform the person in the country of origin of the reasons for the refusal and consider whether there are grounds for a report to the Authority.

14.9. The Obligated Persons shall notify the EEPC of their intention to implement this Article and shall submit all necessary information to substantiate their ability to create Electronic Roaming Accounts. The ability to implement this Article shall be presumed after fifteen (15) days.

from the abovementioned notification and provided that the NECP has not objected or requested additional information.

Article 15

Authentication and verification of the identity of the Player of Gambling conducted over the air

15.1. Obligated Persons, when providing Games conducted on the Physical Network, other than Games conducted with an Individual Player Card, shall ensure that:

a. Payments to the Player of gross winnings before taxes, amounting to two thousand (2,000) euros or more, per ticket, are paid exclusively through Payment Service Providers, upon identification of the Player, by showing his/her identity card or passport or equivalent foreign document. b. Payments to the Player of gross winnings before tax, in the amount of one thousand (1,000) euros and above up to one thousand nine hundred ninety-nine euros and ninety-nine cents (1,999.99), per ticket, may be made, after at the request of the Player, in accordance with the procedure set out in paragraph a'.

c. Money Transfers between the Player and the Obligated Person are carried out upon identification of the Player, by showing his/her identity card or passport or equivalent foreign document. For Money Transfers of an amount of five thousand (5,000) Euros or more, the transaction is executed only after it has been confirmed that the payment account declared by the Player actually belongs to the Player.

15.2. The Casino Businesses shall ensure that:

a. Before the Player enters the gaming area, they shall obtain a record of the Player's identity information, including the Player's name, age, address and ID card or passport number or equivalent document and keep a copy of the documentary evidence. The extent and type of documentation of the data shall be determined according to the risk, based on the analysis of the Obligated Person. An indicative list of the methods of authentication and verification of the Player's identity is set out in Annex I to the Rules.

β. Payments of gross winnings to the Player in the amount of five thousand (5,000) euros or more, are made upon identification of the Player, by showing his/her identity card or passport or equivalent document. These data must be cross-checked with those kept under paragraph a' above.

c. Transfers of Funds between the Player and the casino are carried out upon identification of the Player, upon presentation of his/her identity card or passport or equivalent document. For Transfers of an amount of ten thousand (10,000) Euros or more, the transaction shall be executed only after it has been confirmed that the payment account declared by the Player actually belongs to the Player.

Article 16

Profit certificate - Profit certificate

16.1. Obligated Persons conducting Gambling through a Player's Electronic Account shall, upon the Player's request, provide a statement of pre-tax profits for the immediately preceding financial year, for the total net profits generated based on the total of the Player's Gaming Activity in the financial year under review.

16.2. The Persons liable to conduct Gambling through the Physical Network, shall issue, upon the Player's request, a pre-tax profit certificate for net winnings of one thousand (1,000) euros or more per ticket, for the immediately preceding financial year, for all winnings paid either through payment orders of cases a' and b' of par. 15.1 or by means of a Money Transfer as referred to in subparagraph c) of the same paragraph.

16.3 The Casino Businesses shall, upon the Player's request, issue a profit certificate for the immediately preceding financial year, for net profits of ten thousand (10,000) euros or more for the total profits earned during the financial year under review. The certificate is granted if:

a. The Participation of the Player in the Games and the winnings certified as having been earned from such Participation during the financial year under review can be identified and verified on the basis of the data kept in an information system of the Games in which the Player participated and of the means of Participation and payment in respect of the winnings certified, with a transaction-by-transaction analysis and recording of the exact time of Participation.

β. The Player's full details have been certified and verified in accordance with the model in Annex II of the Regulations, which is attached hereto and forms an integral part thereof, as well as the payment account held by the Player with a Payment Service Provider, where required under the Regulations.

c. Appropriate due diligence measures appropriate to the risk have been applied.

16.4. The profit certificate is issued, exclusively, to Players who have a Greek VAT number and states at least:

a. The details and number of the Player's identity card or passport.

β. The Tax Identification Number. c. In discrete strands:

aa. the total amount spent by the Player for his/her participation in the Games,

bb. the total amount of gross profits earned during the reporting period,

cc. the total amount of tax withheld on the profits in accordance with the applicable provisions,

d. the total amount of net profits realised during the reporting period.

16.5. The certificate shall be issued only upon certification and verification of the Player's full details in accordance with Annex II of the Rules and after the application of appropriate due diligence measures depending on the risk.

16.6. The Casino Businesses, upon request of the Player, issue a Winnings Certificate to Players with permanent residence abroad, who visit Greece and declare that they are going to transfer their winnings by leaving the country. The winnings certificate shall be issued for winnings payments made to the Player exclusively in cash, in an amount, per transaction, equal to or greater than the amount that is subject to a declaration obligation under Regulation (EC) No 1889/2005 of the European Parliament and of the Council of 26 October 2005 (L 309/9 of 25 November 2005) on controls of cash entering or leaving the European Union (L 309/9 of 25 November 2005).

16.6.1. The profit certificate:

α. It is issued for the sole purpose of documenting the Player's declaration when leaving Greece.

β. It shall not be in a position to prove the net winnings made by the Player upon his/her participation in the Games.

γ. It is not a presumption of legal possession by the Player of other liquid assets that he/she brings with him/her when leaving the country.

δ. It can be used for tax purposes if it is accepted by the authorities of the country of origin.

16.6.2. The profit certificate is issued if: a. The Participation of the Player in the Games and the winnings that the Obligated Person certifies that he/she earned from this Participation during the reporting period can be identified as the Player and verified on the basis of the data kept in an information system, with a transaction-by-transaction analysis and recording of the exact time of Participation, the Games in which he/she participated and the means of Participation and payment, with regard to the winnings that certified.

β. The Player's full details have been certified and verified in accordance with the model in Annex II of the Rules.

γ. Appropriate due diligence measures appropriate to the risk have been applied.

16.6.3. The profit certificate says at least:

α. The Player's details and the Player's passport number.

β. The Player's social security number or other identification of equivalent validity under the law of the country of origin.

γ. The information referred to in paragraph c' of par. 16.4.

16.7. The certificate and the profit certificate shall bear a unique validity code, which shall be communicated to the NRC upon their issue.

16.8. The Obligated Persons have the right to refuse to issue a profit certificate or profit certificate to the Player when they know or have indications, information or evidence that a Suspicious or Unusual Transaction has been or is being or is attempting to be carried out. In such a case, they shall not disclose to the Player the reason for the refusal to grant a profit certificate or profit certificate and shall report to the Authority.

16.9. A Directive of the Hellenic Statistical Authority shall lay down the specifications and the procedure for the notification of the validity code referred to in paragraph 1. 16.7 and may lay down any other specific details for the application of this Article.

Article 17

Notification of accounts

17.1. The Obligated Persons conducting Internet Gambling, by submitting the application to start conducting Internet Gambling under par. 2 of article 6 of the decision of the Minister of Finance under item 79835 EX 2020/24.7.2020 (B' 3265):

α. The same account and the Player's account held with Payment Service Providers as well as the special codes of these accounts, in accordance with the provisions of article 49 of Law No. 4002/2011 (A' 180).

β. The Payment Instruments they accept for the deposit of Participation and winnings amounts to Players.

17.2. Obligated Persons conducting games through Video Lottery Terminal (VLT) machines shall disclose the information referred to in par. 17.1 to the NECP within thirty (30) days of the entry into force of the Regulation.

17.3. The Obligated Persons conducting Games on the Physical Network, shall notify the N.E.P.C. of the accounts they hold with Payment Service Providers and the Payment Instruments they use and accept for the deposit of Participation amounts and the payment of winnings to the Players, within thirty (30) days from the entry into force of the Regulation.

17.4. The Casino Businesses shall notify the N.E.C.P. of the same account, the Player's account they hold with Payment Service Providers and the Payment Instruments they use and accept for the deposit of Participation and winnings amounts to the Players, within thirty (30) days of the entry into force of the Regulation. The Players' account held by the Casino Operator with a Payment Service Provider shall be deemed to be a bank account held by the Casino Operator for the payment of winnings to the Players in accordance with the applicable provisions. The amounts in the Players' account shall be taken into account in determining the financial security of such undertakings.

17.5. The Obligated Persons shall confirm to the Hellenic Statistical Authority the information referred to in par. 17.1, 17.3 and 17.4 by 31 January of each subsequent year. Any change in these data shall be notified to the EPC no later than fifteen (15) days after the date on which it occurs.

Article 18
Obligations for the entities of the Physical Gaming Network

18.1. The entities forming the Physical Network: a. Implement measures and procedures in accordance with the risk analysis and the Obligated Person's compliance policies with the Regulation, in particular, with regard to the authentication and verification of the Player's identity and payment account, as well as the issuance of a payment order to a Payment Service Provider, where required. The denomination of winning tickets in the name of third parties other than the Player is not required.

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β. Monitor on an ongoing basis the transactions of its area of responsibility regarding the execution of Fraudulent or Unusual Transactions and report on them to the Compliance Officer of the Obligated Person.

c. Ensure the training and participation of its managers and staff in specialised training programmes on money laundering and the financing of terrorism through the gambling sector.

δ. Refrain from any action that may lead to the commission or attempted commission of the offences set out in Article 2 of the AML Law, through the conduct of the Games.

ε. Provide the Obligated Person with the authentication and verification data of the identity of their beneficial owner, which they keep and update without delay in the event of any change.

f. Not disclose, either themselves or their personnel, to the Player or to third parties, with the exception of the Compliance Officer of the Obligated Person, that they have become aware or have been requested or provided with data or information or that an investigation is being or will be conducted or that a report on money laundering or terrorist financing has been or will be submitted to the Authority.

Article 19
Compliance check

19.1. The N.E.E.P. may, at any time, carry out Compliance Audits of the Obligated Persons for compliance with the provisions of the AML Law and the Regulations.

19.2. The provisions of Part II and Part III, Articles 13 to 21 of the decision of the Minister of Finance under reference 125944 EX 2020 shall apply to the Audits.

Finance, "Gambling Regulation on Administrative Measures and Penalties" (B' 4884).

19.3. The Obligated Persons and their Personnel must facilitate in every way and at the appointed time the appointed audit bodies and provide them with unhindered access to all their Facilities as well as to documents, data, information or any other item that may be helpful for the Audit or the audit work.

Article 20
Compliance procedure

20.1 By decision of the NECP, before the imposition of an administrative sanction, the administrative measure of compliance may be applied in accordance with par. 1 of Article 51 of Law No. 4002/2011 (A' 180).

20.2 The compliance procedure is carried out in accordance with the provisions of Article 3 of the decision of the Minister of Finance under 125944 EX 2020, "Gambling Regulation on Administrative Measures and Sanctions" (V' 4884).

Article 21
Administrative measures and sanctions

21.1. In the case of violations of the obligations arising from the AML Law and the Regulation, the E.E.E.P., by decision, taking into account the criteria of Article 22:

a. impose on the Obligated Persons a lump sum fine of five thousand (5,000) to one million (1,000,000) euros per infringement and/or

b. temporarily suspend for up to three (3) months or permanently revoke the Entity's Gaming License and/or

c. impose on the Personnel of the Obligated Entity, the entities that constitute the Physical Network, as well as on the natural persons who are obliged to hold a Suitability Licence in accordance with the provisions of Articles 5 and 7 of the Ministerial Decision 79305 EX 2020 "Regulation on the Suitability of Persons for Gaming" (V' 3262), a fine of one thousand (1,000) to one million (1,000,000) euros per violation and/or

d. temporarily suspend for up to three (3) months or permanently revoke the Suitability Licence, in the case of natural persons who are required to hold a Suitability Licence in accordance with the provisions of Articles 5 and 7 of Ministerial Decision 79305 EX 2020 "Gambling Regulation on the Suitability of Persons" (B' 3262) and/or

e. require the Obligated Person and the entities constituting the Physical Network to remove from their positions the officers and employees responsible for the commission of the infringement for a fixed or indefinite period of time, and/or prohibit them from taking up another equivalent position.

21.2. Decisions imposing administrative sanctions are posted on the website of the NECP in accordance with the provisions of the AML Law.

21.3. In each case of unsuccessful implementation of the compliance procedure under Article 20, the fine shall be increased by 20% up to 50%.

21.4. In each case of a repeat offence in accordance with Article 24, the fine shall be increased by 25% to 50%.

Article 22

Criteria for determining and measuring administrative penalties

Criteria for the determination and assessment of administrative sanctions are:

- a. The degree of fault.
- β. The number and content of the individual sub-bills that have been violated.
- c. The duration of the infringement.
- δ. The economic power of the person and the amount of the financial benefit gained or sought to be gained by the Controlled Person and/or the value of any illegal transactions.
- ε. The extent of the involvement of the persons representing, managing and administering the Obligated Person and the Natural Network in the commission of the infringements.
- f. The extent of the damage to the Greek public and the Players.
- ζ. Repeatedly committing violations of the provisions of the AML Law and the Regulations.
- η. Any repeated non-compliance with the instructions of the NECEP, as well as the unsuccessful completion of the compliance procedure of Article 20.
- θ. The refusal of the Auditee to cooperate and the obstruction of the N.E.E.P. and its auditing bodies during the conduct of the audit of the specific case.

Article 23

Extenuating circumstances

Extenuating circumstances taken into account for the determination and assessment of administrative sanctions are:

- a. The degree of cooperation of the Auditee with the N.E.E.P.
- β. Whether the Auditee has taken actions that have brought the Auditee back into compliance with the AML Act and the Regulation.
- c. Whether the Auditee has taken any action that removes the effects of the violation.
- δ. Whether the Auditee has taken steps to ensure that similar violations are prevented in the future.

Article 24

Recidivism

24.1. Any person who commits, within two (2) years from the imposition of the first administrative sanction after the entry into force of this Decision, two (2) additional infringements for which a sanction was imposed.

24.2. The Controlled Person ceases to be a repeat offender upon the expiration of two (2) years from the imposition of the sanction by which he or she entered recidivist status.

Article 25

Payment of the fine

25.1. The fine shall be paid into a bank account held by the E.E.E.P. within thirty (30) days of the date of notification of the act of imputation to the person concerned. The deposit constitutes payment of the corresponding fine, as evidenced by the bank document of the deposit, which explicitly states the nature of the fine and the full details of the person liable. When the debtor produces the above document, the National Revenue Agency issues and issues the corresponding recovery document.

25.2. If the fine is not paid within the above deadline, it is established and collected in accordance with the provisions of the Public Revenue Code.

Article 26 Other

provisions

Directives issued by the European Economic and Social Committee shall regulate in particular technical and detailed matters for the implementation of this Decision, in addition to those specifically mentioned in individual provisions thereof.

Article 27

Transitional and repealed provisions

26.1. Persons who, at the time of the entry into force of this Agreement, lawfully provide Internet gambling services, shall designate a Compliance Officer in accordance with the provisions of this Agreement within fifteen

(15) days from the granting of the License. The above persons shall apply the provisions hereof upon the commencement of the conduct of Gambling under the License in accordance with the provisions of Paragraph. 2 of article 6 of the decision of the Minister of Finance under item 79835 EX 2020/24.7.2020 (B' 3265). Until the commencement of the conduct of Gambling under the License, the Obligated Persons referred to in this paragraph shall apply the provisions of Decision No. 129/2/2014 (B' 3162) of the NECP.

26.2. Without prejudice to par. 26.3, the Obligated Persons who, at the time of entry into force of this Agreement, are Licensees, shall designate a Compliance Officer in accordance with the provisions of this Agreement within fifteen days of the entry into force of this Agreement.

(15) days after the effective date of this Agreement and shall apply the provisions of this Agreement as of August 1, 2021. Until 31 July 2021, the Obligated Persons referred to in this paragraph shall apply the provisions of the decision of the NECP no. 129/2/2014 (B' 3162).

26.3 Casino operators shall apply the provisions of this Regulation from 1 January 2022. To this end, they shall designate a Compliance Officer and notify the NCP of the measures, procedures, policies and risk analysis they apply to ensure compliance with

obligations under the AML Law and this Agreement until 30 November 2021.

26.4 As of the entry into force of the present decision, the decision number 129/2/2014 (B' 3162) of the Hellenic Economic and Social Council is repealed, unless otherwise specified in the provisions of this article.

Article 28
Entry into force

This Decision shall enter into force on the date of its publication in the Official Gazette, unless otherwise specified in its individual provisions.

ANNEX I

A. INDICATIVE LIST OF METHODS FOR THE CERTIFICATION AND VERIFICATION OF THE IDENTITY OF THE PLAYER OF GAMES OF CHANCE CONDUCTED THROUGH AN ELECTRONIC PLAYER ACCOUNT OR AN INDIVIDUAL PLAYER CARD

As part of its obligations to certify and verify the identity of Players at the stage of creating an Electronic Player Account or issuing an Individual Player Card, the Obligated Person shall implement procedures and ensure that:

a. The information provided by the person corresponds to a real person based on documents, data and information from a reliable source.

β. The person in whose name the Electronic Account is created or the Individual Player Card is issued is the person who applies for registration.

c. The person who participates in the Games through an Electronic Account or an Individual Player Card is actually the person whose details have been submitted under the requirement in (a).

The Obligated Person to secure the above requirements:

a. Requests from the person applying for the creation of an Electronic Player Account or the issuance of an Individual Player Card, the submission of his/her identity card or passport or other equivalent document issued by a competent state authority, in paper or electronic form.

β. Apply combined use of username and password or use of a Personal Identification Number (PIN) in the case of an Individual Player Card.

c. Ensure that the Player's identity is verified by its qualified personnel through physical presence.

δ. Implement procedures and practices to verify the Player's details through third-party sources, such as:

aa. Verifying the Player's contact details by submitting documentation, such as an account telephone, electricity, water, etc.

bb. Verification that the Player maintains a payment account in his/her name. Indicatively, it may ask the Player to submit the IBAN of his bank account at the registration stage and/or verify directly through the Service Provider

Payments. In the case of withdrawals to the Player, the Obligated Person may choose to pay a small amount, e.g. up to EUR 0.30, depending on the limits of the Payment Service Provider and/or to verify this directly through the Payment Service Provider.

In the case of electronic submission, the Obligated Person shall communicate with the Player by any appropriate means, such as recorded telephone communication, mobile phone messages, registered mail, etc.

B. INDICATIVE METHODS OF CERTIFICATION AND VERIFICATION OF THE IDENTITY OF THE PLAYER OF GAMES OF CHANCE CONDUCTED ON THE PHYSICAL NETWORK AND IN CASINOS

The Obligated Person providing Games through the Physical Network, except for Games conducted through an Individual Player Card, as well as the Casino Businesses, shall verify the physical presence of the Player through their specialized staff and ensure that the payment of winnings to the Player exceeds the monetary limits set forth in the Regulations, is made upon presentation of a national or foreign identity card or passport or equivalent document confirming, where required, that the payment account declared by the Player actually belongs to the Player. Casino Establishments shall identify the Player before entering the gaming area.

ANNEX II
AUTHENTICATION AND VERIFICATION OF THE PLAYER'S IDENTITY WHEN ISSUING A WINNINGS CERTIFICATE OR WINNINGS CERTIFICATE

A. The minimum information required to verify the identity of Players when issuing a Certificate or Winning Certificate, as well as the documents required to verify such information, are as follows:

DETAILS OF THE PLAYER'S IDENTITY CERTIFICATE	INDICATIVE DOCUMENTS FOR THE VERIFICATION OF THE PLAYER'S IDENTITY (IN DUPLICATE OR CUMULATIVE, AS APPROPRIATE)
Full name and maiden name	Valid Identity Card or Passport Identity card of persons serving in the Security Corps and the Armed Forces In the case of issuing a certificate of winnings for Players with permanent residence abroad, an equivalent document issued by a competent authority of the country of origin
Document number identification and issuing authority	
Date and place of birth	

Home address, Contact telephone number	Recent telephone, electricity and water bills Lease that has been submitted to a Public Financial Service (D.O.Y.) Income statement or other documents issued by the D.O.Y. Permanent residence permit in Greece, valid In the case of issuing a certificate of winnings for Players with permanent residence abroad, an equivalent document to the above issued by a competent authority of the country of origin
Occupation	Employer's certificate Employer's statement or other documents issued by the Public Tax Office. Copy of recent pay slip Professional identity card/ CEMI certificate Certificate Certificate of Insurance Institution In the case of issuing a certificate of winnings for Players with permanent residence abroad, an equivalent document to the above issued by a competent authority of the country of origin
Tax registration number (A.F.M.) Social security number	A tax clearance certificate or other documents issued by the Tax Office. In case of issuing a certificate of winnings for players with permanent residence abroad, a document or a certificate issued by a competent authority in the country of origin showing the Player's tax or social security number

B. In the case of the issuance of a Winnings Certificate for Players permanently residing abroad, the Obligated Persons may request a translation of the above documents in order to understand their content.

ANNEX III INDICATIVE TYPOLOGY OF SUSPICIOUS OR UNUSUAL TRANSACTIONS IN GAMBLING

A. Indications, in order for certain transactions or activities to be considered as Unusual or Substandard, are indicative:

a. The Player's unwillingness or refusal to produce his/her identification documents or documents, data and information.

β. The submission by the Player of documents of doubtful authenticity or the provision of insufficient, inaccurate or unverifiable data and information. c.

Frequent change of the Player's address, which is not justified by the professional or business

its activity.

δ. The Player's telephone connection is disabled or not working.

ε. Information from an external source (local community, media, etc.) that the Player or persons associated with the Player are likely to be involved in the commission of the main offences under Article 4 of the AML Law.

f. Information that a Player leads a luxurious life, which is not in line with his/her professional or business activity or financial situation or social and economic profile.

ζ. Information that the Player is involved in virtual or offshore operations.

η. Conducting transactions that are not consistent with the Player's normal Playing Activity and familiar patterns.

θ. Carrying out successive, small transactions, the total amount of which is high.

ι. The occurrence of unusual nervousness on the part of the Player at all stages of the Business Relationship.

ια. The number and frequency of transactions for amounts below the minimum limits set by the Regulation.

Ι. The making of complex or unusual bets, without an obvious economic purpose or bets on all outcomes of the same betting event. m. Attempting to collect a ticket that has been declared

as lost.

n. The submission of a large number of nominal payment orders for the issuance of a winning certificate and/or the submission of requests for the issuance of winning certificates resulting from winning tickets with an unusual geographical spread.

οath. Failure to confirm the payment account in the Player's name at the time of payment.

Hist. The Player's request for a Transfer of Funds to a third party payment account.

g. A Player's request to pay winnings in a third party payout account.

ii. Depositing funds into a Player's Electronic Account using Payment Instruments belonging to a third party. i.

The activation of inactive for a long period of time Player's online account setup.

k. Depositing funds into a Player's Electronic Account which the Player withdraws without having participated in the Games or Participates by paying disproportionately small amounts in relation to the amounts deposited. k. The number and frequency with which the Player

open and close Electronic Accounts.

kb. The Player's request for payment of winnings to a payment account held in Non-Cooperative States.

B. The above are, where applicable, indications of Suspicious or Unusual Transactions and for the Personnel of the Obligated Person, the Physical Network and for the natural persons who are obliged to hold a Suitability Licence in accordance with the provisions of Articles 5 and 7 of the Ministerial Decision 79305 EX 2020 "Regulation on the Suitability of Persons for Gambling" (B' 3262). In addition, the following are indications for these persons:

α. Increased participation of persons or persons in their close family environment in gambling.

β. Unusually high collection of vouchers from the shops compared to their usual turnover.

γ. Failure to comply with the provisions of the AML Law and the Rules.

δ. An unusually high number of nominal payment orders for vouchers for an amount below the prescribed limit.

ε. Unreasonable increase in the volume of transactions. This decision shall be published in the Gazette of Government.

The President

DEMETRIOS DJANATOS