<u>Draft Gambling Regulation on the regulation of administrative control and</u> <u>operation of casinos</u>

CHAPTER I

GENERAL PROVISIONS

Article 1 Definitions

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

A license is the license granted by the Greek State for the establishment, operation and exploitation of Casinos, according to the provisions of Law 2206/1994 (A 62) and Law 3139/2003 (A 100), the licenses granted under the provisions of Articles 357 to 378 of Law 4512/2018 (A 5), as well as any act of the State by which the Greek State grants, based on the provisions in force, the right to establish, operate and exploit Casinos.

A Fitness Licence (LC) is the act of approving the fitness of a person in accordance with the relevant provisions of the Fitness Regulations.

An Excluded Player is a Player who is not permitted to enter the Gaming Area and participate in the Games.

Player Database or Database is the set of data of the Playing Activity held by the Licensee and accessed by the NCPC.

Basic Memory is the electronic device used to program and store exclusively the Game's software program.

Notification is the written notification of the EEPC of the Licensee's intention to change elements of the operation of the Casino Premises. The change may take place after seven (7) working days from the date of the Notification, unless otherwise provided for in the Regulation, and provided that the NECP, within the respective time period provided for, does not request additional information to form its judgment or does not express a contrary opinion.

Conduct is the conduct of a game under case mth of article 25 of Law no. 4002/2011 (A' 180). Where the provisions of the present the concept of Conduct is provided for in the provisions of the present shall be understood as the concept of Organization and vice versa.

An organisation is the organisation of a game in case j) of article 25 of Law no. 4002/2011 (A' 180). Where the provisions of the present the concept of the organization is provided for in the provisions of this shall be understood as the concept of the Conduct and vice versa.

The GSA or Authority is the Gambling Supervision and Control Commission.

An Importer or Supplier is a person who supplies, sells, resells, leases, leases, promotes, offers and in any way makes available to a Licensee Technical Means and Gaming Materials and has obtained a Suitability Licence for this purpose from the CRA.

Ancillary Areas are the areas that support the operational needs of the Gaming Premises.

A Special Area (studio) is an area located within the Gaming Area,

in which the Licensee installs equipment and infrastructure for the conduct of Other Internet Games conducted by a live dealer, in order to provide the Games conducted in the Special Area to holders of a licence to organise and conduct Other Internet Games of the

case (kb) of Article 25 of Law No. 4002/2011 (A' 180), conducted live, the result of which is not extracted by a random number generator (RNG).

Electronic Entry System is the electronic system that records and verifies the details of persons entering the Gaming Venue.

Electronic Player Account is the unique account created and maintained by the Licensee for the Player's participation in the Games.

Regulation is this decision of the Gaming Regulations of par. 3 of Article 29 of Law 4002/2011 (A'180).

Change Management Regulation is the decision of the Minister of Finance 79300 EX 2020 "Adoption of the Gaming Regulation on Change Management in Central Information Systems (CIS)" (B' 3261).

Administrative Measures and Penalties Regulation is the decision of the Minister of Finance 125944 EX 2020 "Adoption of the Gaming Regulation on Administrative Measures and Penalties" (B'4884).

The Change Management Regulation is the decision of the Minister of Finance 79300 EX 2020 "Adoption of the Regulation on Change Management in Central Information Systems (CIPS)" (B' 3261).

Commercial Communication Regulation is the decision of the Minister of Finance 79292 EX 2020 "Adoption of the Gaming Regulation on the Commercial Communication of Gambling" (B'3260).

The **Anti-Money Laundering Regulation** is the EUMC Decision 554/5/15.4.2021 "Regulation on the implementation of measures to combat money laundering and the financing of terrorism by the Persons liable for payment in the market for gambling services" (B'1633).

The Eligibility Regulation is the decision of the Minister of Finance 56580 EX 2022 "Amendment and codification of the decision of the Minister of Finance No. 79305/27.7.2020 "Adoption of the Gaming Regulation on the Eligibility of Persons" (B' 3262 Correction of errors B' 4441)" (B' 2166).

The **Gaming Regulation** is the set of ministerial decisions under paragraph 3 of Article 29 of Law No. 4002/2011 (A' 180).

Eligibility is the determination by the SSC or the Licence Holder of the qualifications and conditions for the granting of an AOC in accordance with the provisions of the Regulation. In determining suitability, the SSC shall consider, inter alia, information relating to the identity, place of establishment, history, criminal record, organization, operation and, in general, the lawful presence and business activity of the person applying for a licence.

A Manufacturer is the person who manufactures (indicatively studies, designs, assembles, produces, programs) and in any way makes available to a Licensee and/or Importer any Technical Means and Materials and has obtained for this purpose a Suitability Licence from the EEAEP as well as the person who holds a Special Area Licence.

Player Card means the card issued by the Licensee, used by the Player to participate in the Games and linked to the Player's Electronic Account.

A Licence holder is the person to whom a Licence has been granted.

With comments [A1]: An amendment is required to Articles 45-47 of Law No. 4002/2011

Centralised Casino Gaming Information System (CGSG) is the set of necessary hardware and software used, maintained and controlled by the Licensee and which is required for the organisation, operation, conduct, monitoring, recording, management and control of electronic gaming. The CSMS shall include, as a minimum: (a) Data backup and recovery system is the part of the CPSM that ensures the recovery of the system in the event of a disaster, the storage and recovery of data, the restoration of operation and the creation of copies of all data in the CPSM; (b) Player Card Management System is the part of the CPSM that issues, monitors and manages the Player Card, c) Game Management System is that part of the GCS that manages and controls the proper functioning of the Games and Jackpot software; d) Player Management System is that part of the GCS that stores and manages the data in the Base; e) Communication Control System is that part of the GCS that manages the communication functions with the Games; and f) Accounting System is that part of the CSMS which collects and processes the accounting data from the Electronic Games as well as other systems exclusively related to such data, in order to detect and manage them.

A Game Cycle is a complete sequence of events in a Game, the outcome of which is extracted using a Random Number Generator, which starts with Participation and lasts until the transfer or loss of credit units in that sequence.

A register is the set of case-by-case data kept by the CRA, in accordance with the Gambling Regulation.

An EPROM ID is the code or name of the program/software of each Game, which:

- a. identify the unique content and the possibilities of the Playboy program/software,
- b. is contained in the Basic Game Memory,
- c. is stated on the Game's certificate issued by an independent Certification Body.

Instructions are the circular instructions issued by the NCA on the application of the provisions of the Gambling Regulation. The Guidelines have binding force in the context of the Authority's relations with its administrators.

The **Participation Guide** is the guide of paragraph 11 of article 378 of Law No. 4512/2018 (A'5) and Article 18 of the Rules.

A Certification Body is an organization that operates a specialized laboratory (Test Lab) and has been recognized by the Hellenic Accreditation Council, in accordance with the Suitability Regulation or an organization accredited in accordance with the applicable European and / or international standards, by the public limited company National Accreditation System S.A. (E.SY.D.) or by accreditation bodies of other countries, with which E.SY.D. S.A. has signed a mutual recognition agreement.

A Gaming Machine is the MTF on which Electronic Games are conducted.

A Player is a natural person who legally participates in the Gambling Games organised and conducted by the Licensee.

Playing Activity is the set of transactions and other data held in the Licensee's computer systems for each specific Player and linked to the Player's Electronic Account.

Playing Day is the period of time from 7 a.m. of each calendar day of operation of the Casino until the end of the Casino's operating hours, as provided for in Article 24 and, in any case, until 7 a.m. of the following calendar day.

A Playing Session is the period of time between the time a Player starts his/her Participation in the Game and the time he/she ends his/her Participation. In Table Games, a Playing Session is the period of time between the start of the Participation in the Table Game and the Player's departure from the table.

A Payment Service Provider is a credit institution or a payment institution or an 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.

Certification is the approval granted by the CERT for the installation and commissioning of an IMS, following a Certification Body's attestation of compliance with the Technical Specifications or documentation of the equivalence of the technical and functional characteristics of an IMS to those specifications.

Supervision and Control Information System (SCIS) is the set of hardware and software installed and operated by the EEAEP in accordance with Article 30 of Law 4002/2011 (A' 180). Until the installation and operation of the SCIS by the EEAEP, the Licensee is obliged to provide the Authority with remote access to the CSFMS, in the context of the exercise of its supervisory and control duties and responsibilities.

The Regulatory Framework is the Gambling Regulations and the set of legislative and other regulatory provisions that define the conditions for the legal organisation and conduct of Gambling in the Greek territory, the terms of the Licences, as well as the Guidelines of the NECC.

Affiliate Points are the websites owned by the Affiliates (Junkets).

An Information and Help Point is any point within the Licensee's premises and on its Website where the Participation Guide is made available and where the public and Players are provided with information and information, in printed and/or electronic form, on the support of a Player who has a problematic Gaming Activity, the conditions, possibilities, terms and conditions of exclusion from the Games, the possibilities of providing counselling to deal with problems of dependence and addiction.

Participation in Gambling or Participation is

A Casino Business Partner or Junket Operator is any natural or legal person, domestic or foreign, who cooperates with the Licensee to promote the possibility of conducting the Games and attracting customers, in accordance with the provisions of par. 27 of Article 378 of Law 378 of the Law. 4512/2018 (A' 5) and is registered in the relevant Register maintained by the EEPC.

Checksum function is a number equal to the sum of the instructions of a software program in a memory. Two programs with identical content have the same Checksum number. O

checking the Checksum number of a memory is intended to verify the invariance of that memory.

Technical Specifications (TPS) are the specifications set by a decision of the CTEP for software, hardware, networks, systems and other gaming equipment.

Technical Means and Materials for the Conduct of Games (TMM) is the certified, if required, means / material / machine electronic / mechanical or electromechanical and electronic program (any kind of software-SOFTWARE or computer system), which is used directly or indirectly for the conduct of the Games and which relates to and/or influences and/or determines and/or monitors and records the result of the Games or the conduct of the Games in general.

A technician is a person who provides repair and maintenance services of the TMY and has obtained for this purpose a Licence of Suitability from the EEAEP.

A Gaming Sector is a category of Games and specifically: a) Table Games, including roulette and roulette wheels as well as electronic roulette and their subsystems, b) Gaming Machines, c) any other category of Games that the Casino may conduct in accordance with the applicable provisions and defined by a Directive of the NECC.

Games of Chance or Games are games that meet the terms and conditions of paragraph 7 of article 378 of Law 4512/2018 (A 5), are described in the Participation Guide issued by the Licensee and have received the required Certifications.

Responsible Gambling is the set of regulations and directives of the ECG that aim to ensure that all gambling activities are conducted in accordance with the applicable provisions in a socially responsible manner, in order to minimise the negative impact on players from their participation in gambling.

A Casino Premises is a Gaming Premises and ancillary premises together.

A Gaming Premises means, in aggregate, all indoor and/or outdoor areas in which Gaming Facilities are located and operated, including areas for distinguished Players (such as Private/VIP rooms, salon privé).

Jackpot means the cash prize of a fixed or progressively increasing value awarded to Players, including the mystery jackpot, which is collected by the deposit of credits by the Licensee and/or by the withholding of credits from one and/or more Games on one and/or more Gaming Machines, in one and/or more casinos participating in the Jackpot operation, in accordance with the terms approved on a case-by-case basis by the SRO.

Article 2 GENERAL PRINCIPLES

- 2.1. The Licensee is obliged to ensure the high quality operation and exploitation of the Casino Business at all times.
- 2.2. The Licensee shall ensure that the Organisation and Conduct of the Games is reliable, in compliance with public order rules, the Regulatory Framework, and the TEPs, and that public health, safety, and the legality and transparency of transactions are not compromised.
- 2.3. The Licensee shall ensure that minors, persons under 21 years of age and Excluded Persons are not allowed access to the Gaming Area.

- 2.4. The CECE, under the principle of mutual recognition, may grant the Certifications provided for in the Regulation to machinery, equipment, software applications or systems legally manufactured and/or sold in a Member State of the European Union, the United States of America, Australia, Japan, China or other countries, provided that they offer an equivalent degree of protection to that specified in the Technical Specifications and the Regulation. The procedure for confirming the equivalent degree of protection shall be carried out by Certification Bodies, at the expense of the applicants for certification.
- 2.5. The documents provided for in the Regulation are circulated in paper and/or electronic form.
- 2.6. In case of rejection of the application for Certification or withdrawal of the granted Certification, fees and charges paid in accordance with the applicable provisions and the Regulation are not refundable.
- 2.7. The SCC shall verify, in aggregate or on a sample basis, the accuracy of the information submitted under the Regulation.
- 2.8. The approvals or Certifications granted by the EEAEP do not in any case modify or abolish other more general provisions in force (e.g. planning, fire safety, e t c .) and do not prevail over them.
- 2.9. The Licensee shall establish a CSPK through which the organisation, operation, conduct, monitoring, control and management of the Games shall be carried out at a central level. The CPCS shall ensure the smooth, solvent and reliable operation of the Games.
- 2.10. The Licensee shall ensure that each system is in constant communication with the CACS, so that it can be monitored and supervised in real time. Each Gaming Monitoring and Control System shall have full software and physical security in order to fully ensure: a) access by the SIRC to all computer programs, stored records, data, information and data and, in general, to all functionalities of that system; and b) the integrity, reliability, accuracy and fidelity of the records, information and data, as well as of all derived data, information and data sent to the PSPC. The complete and integrated technical infrastructure for the conduct of the Games, linked through all types of computer systems, computer programs and software (SOFTWARE) used to control the operation of the Games, as well as the auxiliary systems of the other casino functions to the PSCE is a continuous obligation throughout the duration of the Licence, which is maintained at the responsibility, expense and care of the Licensees, in accordance with the Technical Specifications, the Regulation, as well as the relevant decisions of the NECC on these matters. Until the completion of the full communication of the casinos' systems with the CCAMLR, the Licensees are obliged to provide the SIRC with the possibility of remote full access to their systems, in a manner and at a time determined by the SIRC.
- 2.11. During the examination of the application for the granting of a License / Certification, the NECC, for the accuracy, completeness and authenticity of the submitted data and supporting documents, may request from the applicant or any other body and authority of the public and private sector, in Greece and abroad, any data, information or document that is deemed appropriate. Applicants shall, without obligation and without reservation, give full and unconditional authorisation to the EUEB to process the personal data and information concerning them, including the making available to the Authority and/or the verification by the Authority of the aforementioned data and information by third parties. Where relevant

certificates and records are derived from registers available in electronic form, the applicant shall be exempted from the obligation to produce them if he indicates the electronic address where they are posted, accessible and retrievable. The Authority shall verify, either globally or on a sample basis, the accuracy of the information submitted in the context of the granting of a Licence, Authorisation and Certification and may, at any time, carry out an ex officio verification of compliance with the terms and conditions of the Licences, Certificates and authorisations of any kind.

- 2.12. The Licensee shall, on a daily basis, account for the opening and closing of tables where Games are conducted. The accounting closure of the tables shall take place no later than 7 a.m. on the day following the day on which they were opened. In absolutely exceptional circumstances (such as on public holidays) and after informing the EIF, the accounting closing time of the tables may be extended by up to two (2) hours. The Gaming Machines shall remain in continuous operation throughout the operating hours, except in cases of maintenance and/or removal, in which case the provisions of the Regulations shall apply.
- 2.13. All unauthenticated forms, forms or books of the Regulation are kept in a digital and/or computerised manner that ensures the authenticity and validity of the data kept.
- 2.14. Employees employed in table games, gaming machines, reception and the collection and counting of entry devices are prohibited from wearing pockets or other types of pouches on all of their clothing during the performance of their duties.
- 2.15. Compliance with the provisions of the Regulations is the exclusive obligation of the Licensee.
- 2.16. Specific issues for the application of the Regulation may be regulated by a Directive of the Committee.

Article 3 RESPONSIBLE GAME

- 3.1. The Licensee shall ensure that the Organisation and Conduct of Games is carried out in accordance with the Regulatory Framework, the Principles of Responsible Gaming and the relevant decisions of the ECGC.
- 3.2. The Licensee shall design and implement a strategy for the promotion of Responsible Gaming with defined objectives and actions that correspond to international market developments and best practices and shall make use of the findings of current research in the field of Responsible Gaming, informing the Authority on the design, parameters and implementation of the above, upon its request.
- 3.3. The Licensee shall ensure that at the Information and Help Points and on the Website the public and Players are informed a b o u t :
 - a. responsible gambling and the negative consequences of not engaging in responsible gambling,
 - b. the opportunity to take a self-assessment test on problem gambling participation,
 - c. the possibility of exclusion from participation in the Games and the procedure for this,
 - d. the contact details of gambling addiction support organisations and rehabilitation centres.

3.4. The Licensee informs through the Website about the actions it implements in relation to Responsible Gaming and posts relevant information and material.		
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CHAPTER I CAFETERIA SPACE

Article 4 KAZINO SPACE

- 4.1. The Casino area includes:
- **4.1.1.** The Gaming Area (casino floor, Private/VIP rooms, salon privé), including Special Areas.
- **4.1.2.** auxiliary spaces that support the operational needs of the Gaming Premises and which include:
 - a. the service and reception areas, b. the

accounting and cashier areas, c. the

counting areas,

- d. the premises of currency exchange offices and bank branches, including automated teller machines (ATMs),
- e. the Information and Help Points.
- 4.2. Within and/or outside the Casino Area, the following additional areas may be developed and operated:
 - a. the area of central management and operation of the CCTV
 - system, b. the area of operation of the surveillance system (CCTV),
 - c. the premises used for the repair, maintenance and storage of the TMCs included in the registers of the Licensee and the CAA,
- 4.3. All areas of paragraphs 4.1 and 4.2 are monitored by the closed electronic audiovisual surveillance system (CCTV).
- 4.4. The Licensee shall ensure that each area referred to in paragraphs 4.1 and 4.2 is clearly demarcated, secure, functionally defined, with controlled access and is marked with a prohibition sign for those who are not allowed access to it.
- 4.5. The Licensee shall ensure that the exact location of each MTF located in the Gaming Premises is clearly and accurately depicted at all times. The mapping may be in digital format.
- 4.6. The Licensee shall ensure that an office of the CFCA is established and operated in the Casino Premises, with the equipment indicated by the Authority and for the purpose of carrying out its supervisory and control work without hindrance. Access by any person to the above office, as well as its alteration or relocation, shall be subject to the approval of the CFCA.
- 4.7. The statutory permits and authorisations for the legal and safe operation of the premises referred to in this article shall be notified to the EEAEP without delay.
- 4.8. The Licensee shall ensure the unhindered access of the NCPC to the premises referred to in paragraphs 4.1 and 4.2 and 4.6 and shall notify the Authority of any changes thereto.
- 4.9. A Directive of the SCCS may specify the modalities of delimitation (demarcation) of the areas referred to in this Article, to determine the details

operation, management, organisation and access to them and to specify any other necessary details.

Article 5 REVISIONS - TRANSFERS

- 5.1. The Casino Site is rearranged/changed as follows:
- 5.1.1. A rearrangement/alteration, which does not change the Gaming Venue and/or the Ancillary Premises and/or the use of the Ancillary Premises and/or the composition of the MTFs. In this case, the Licensee may carry out the rearrangement/alteration by notifying the SRO within three (3) days of its implementation and provided that it has ensured that:
 - α . The implemented rearrangement/alteration of the Casino Premises complies with the terms of the License, the Regulations and other licenses/approvals relating to the legal operation of the Casino Premises.
 - β. The implemented rearrangement/alteration of the Casino Area is digitally recorded clearly and accurately at any time. Each Game (table, Gaming Machine, etc.) is recorded with its current location code, which is matched with the number that the particular MCP has been registered in the certified book (register) of tables or Gaming Machines.
 - c. The implemented rearrangement/change of the Casino is, at any time, fully comparable with the previous state of the Site.
- 5.1.2. Redevelopment/alteration, which changes the Gaming Area and/or the Ancillary Premises and/or the use of the Ancillary Premises and/or the composition of the Gaming Facilities, regardless of whether it involves a redevelopment/alteration of the location of the Gaming Areas within the proposed Premises and in any case within the edge boundaries of the total area of the Casino Premises. In this case, the Licensee shall submit a Notification of rearrangement/alteration to the NCPC, accompanied by:
 - α . A statement that the notified rearrangement/alteration complies with the terms of the License, the Regulations, other licenses/approvals relating to the legal operation of the Casino Premises and that the proposed rearrangement/alteration of the Casino Premises is digitally depicted clearly and accurately and is fully comparable with the previous state of the Premises at any time.
 - β. Architectural drawing of the Casino Area, in triplicate, certified by a Certified Engineer. The plan shows in detail:
 - aa. The Gaming Ordinance. Each Game (table, machine, etc.) is identified by its current position code, which is assigned to the number that the particular CMM has registered in the certified book (register) of tables or machines.
 - bb. The covered area (field of view) from each installed, operating, fixed or mobile camera and send it to the EEAEP.
 - cc. The outline of the Casino Area.
 - dd. The boundaries between the Gaming Area and the Ancillary Areas (in a clearly visible manner, e.g. a coloured outline).
 - g. The name of all individual premises.
 - pst. The dimensioning (exterior and interior) of the Casino Area.

- gz. Area measurement of the Casino Area (gross/net area), which must be derived from the dimensions indicated on the plan.
- heh. Measurement of the area of the Playing Area (net area) which must be derived from the dimensions indicated on the plan.
- th. Area measurement of the Auxiliary Spaces (gross area), which must be derived from the dimensions indicated on the plan.
- j. A memo including any notation of the record that requires clarification (e.g. boundaries of the Premises, type of Premises, types of Games, etc.).
- laia. A certificate of the Engineer's Diploma, which states: "The information on this plan is complete and accurate. The layout of the premises, as depicted on this plan, meets the conditions of the License and complies with the applicable provisions for the legal and safe operation of the Casino Site."
- c. Timetable (Gantt-type) of the work required to implement the reorganisation/transformation.
- 5.1.3. The SCC may carry out an autopsy, as well as ask the Holder for any information or clarification to form its judgment.
- 5.1.4. A Directive of the Committee may lay down detailed rules for the application of this Article and provide clarifications relating to such application.

Article 6 SAFETY AND MONITORING SYSTEM

The Security and Monitoring System includes:

- 6.1. Closed Electronic Audiovisual Surveillance System Closed Circuit T.V. System (CCTV).
- 6.1.1. The Licensee is obliged to use for the control of the conduct of the Games and the operation of the gaming facilities, as well as the cashier procedures, a closed, electronic audiovisual surveillance system (CCTV), modern technology, with high definition video and sound (High Definition, i.e. at least 720p resolution and IP or HD TVI cameras), with the ability to record and playback video and audio, which shall continuously record and fully cover the Casino Area, including the access corridors to the Casino Area. In all cases, the face of the traders within the Casino Premises shall be recorded. The recording shall not include:
 - $\alpha.$ The administration offices and other service areas for the casino staff located within the Casino.
 - $\beta.$ The sanitary and clothing facilities for the public and staff.
- 6.1.2. The Licensee shall ensure that the CCTV provides the following:
 - α . Photosensitive cameras, with sufficient magnification capability to allow the operator to record and read at any time all information related to:
 - aa. the conduct of the Games and the participation of the Players,
 - bb. the transactions and procedures carried out in the Ancillary Premises,
 - cc. the transactions and procedures carried out at the redemption terminals and in any other place designated by the CRA.

- β. Classified access to the database and operating systems and subsystems only by authorised users.
- c. Creating video and audio files that are not readable or tamperable by commercial video and audio editing software, the authenticity of which can be verified by applying the "Checksum" method or other valid verification method.
- δ. Recording of movements and record keeping of all users who have access to the stored data, with the date and time of each access to these files, the name of the user and the type of movement that took place (such as display, deletion, copying, cutting or saving a file).
- $\epsilon.$ An audible and visual alarm system in case of failure of the monitoring system or equipment.
- f. No loss of data in case of system failure.
- ζ. Full time stamping (date and time) and camera ID for each recording, stored and unstored.
- $\boldsymbol{\eta}.$ Ability to search records and flag incidents.
- 6.1.3. The site of operation of the closed-circuit television (CCTV) system shall have at least the following equipment:
 - $\alpha.$ Communication system with the Casino's security department.
 - β. Computers that communicate with the Casino's PC and have read-only rights to the reports required for the effective operation of the department.
 - c. An interface system with all alarm systems, which produces a different and graded audible and/or visual signal for each individual alarm.
 - δ . An up-to-date photographic record of all active employees of the Licensee, which is available to the NECP and the competent authorities.
 - ε. Updated architectural plan of the Casino Area.
- 6.1.4. The Licensee shall ensure that:
 - α . In the event of a power failure, there is a back-up power supply system for the operation of the closed circuit television (CCTV) system, which is checked at least every six (6) months.
 - β. In all Casino Areas, which are controlled by the closed electronic audiovisual surveillance system (CCTV), there is appropriate lighting to ensure a high definition image when taking videos and photographs.
 - c. There shall be a contingency plan for any malfunction of the
 - d. In the event of a system malfunction, immediately inform the EEAEP of the following:
 - a. the time of the malfunction, b.
 - the cause of the malfunction,

- c. the actions foreseen in accordance with the contingency plan.
- 6.1.5. The Licensee shall immediately replace any device or component of the CCTV that does not operate in accordance with the specifications and shall maintain the system in perfect working order.
- 6.1.6. The Licensee shall implement a regular maintenance program for the CCTV system in order to ensure its proper operation, which, among other necessary actions, includes cleaning the cameras at regular intervals.
- 6.1.7. The Licensee shall deliver the digital recording files to the NCA and the competent law enforcement and prosecuting authorities and provide full and immediate access to the CCTV system facilities and operations at the time and in the manner they specify.
- 6.1.8. The Licensee shall ensure that the NCA has remote access to the CCTV and its data in real time and in the manner specified by the Authority.
- 6.1.9. The Licensee shall keep the logs for a period of at least thirty (30) days, except in cases where their retention is required for the resolution of disputes, in which case they shall be retained until the dispute is resolved, or upon request of the NCPC or the competent law enforcement and prosecutorial authorities, in which case they shall be retained until their written release sent by the aforementioned authorities. Records of the records at the counting premises shall be retained for at least sixty (60) days.
- 6.1.10. Prior approval of the CCTV specification is required for approval, modification and/or configuration of the CCTV specification. No Casino operation is permitted unless the CCTV that has been approved by the CCC is installed and in operation.
- 6.2 Department of Surveillance.
- 6.2.1 The Licensee shall maintain and staff a surveillance department established at specific sites and shall submit to the NECP a plan for its operation. The operating plan shall include:
 - a. staff access grading; b. job description -

responsibilities; and

- c. a minimum number of staff, in order to provide adequate and efficient coverage of the Casino Area.
- 6.2.2 Employees who are or were employed in the Surveillance Department are not allowed to work as employees in jobs in the same Casino directly involved in the conduct of Gaming (croupier, pit boss, slot attendant) until six (6) months after the date of termination of their employment in the Surveillance Department.
- 6.2.3 The entrance to the surveillance section is not visible from the Gaming Area.
- 6.2.4 The Licensee shall comply with:
 - α . An entry book, in which the details of persons who are not employees of the probation department and who enter the department are recorded. This book shall be signed by the persons entering and shall contain, as a minimum, the following information:
 - a. time and date of entry and exit, b. name and surname,

- c. property,
- d. the purpose of the visit; and
- g. the name and signature of the official who authorised the entry.
- β. An incident book updated by the surveillance department staff. This log shall contain at least the following information :
 - aa. the date and time of the start of each event,
 - bb. details of the official who recorded the incident in the logbook,
 - c. details of the Player or other person involved in the incident; d.
 - εε. description of the incident,
 - f. the date and time of recording of the incident on CCTV,
 - gz. time of termination of the event; h.
 - handling and results; and
 - i. recording of a system malfunction at the time of the event.
- 6.3 The surveillance logbook and the incident book shall be kept in the surveillance department and updated by the staff of the department. They shall be leafed and bound in such a way that their pages cannot be removed. These books shall be at the disposal of the SSC and the competent authorities. Alternatively, the Licence Holder may keep these books in electronic format, provided that the format and method of keeping them has been approved by the SSC.
- 6.4 A Directive of the Committee may lay down the detailed rules for the application of this Article and provide clarifications related to this application.

Article 7 EXCLUSION OF PLAYERS

- 7.1. The Licensee shall provide the Player with the opportunity to opt out of participation in the Games. Players who are excluded on their own initiative shall be entered in the Register of Excluded Players maintained by the SRO and shall not be allowed to enter the Gaming Area of all casino establishments.
- 7.2. The Player is disqualified by submitting a Disqualification Statement to the casino. The form and content of the Exclusion Statements shall be determined by a Directive of the EUEB. The Licensee shall make the Exclusion Statement available at its Information and Help Points and on its Website, at least in Greek and English.
- 7.3. The Player may submit the declaration of disqualification in person or by registered mail or by courier service or by fax or email.
- 7.4. The Player is disqualified from participating in the Games upon submission of the above declaration in person or upon arrival of the postal delivery or delivery of the courier delivery or receipt of the fax or receipt of the email. The information identifying the Blocked Player, the duration of the blocking

and the Licence Holder to whom the declaration has been submitted shall be entered in the relevant Register maintained by the CFCA.

- 7.5. The declaring Player chooses the duration of the ban from the following time periods:
 - a. One week
 - β. Fifteen (15) days c. One

month

- δ. Two (2) months
- ε. Four (4) months f. Six
- (6) months
- ζ. Eight (8) months
- h. Ten (10) months
- 7.6. The exclusion shall be lifted once the period for which the applicant has been has been raised and only if the Banned Player has submitted a request to the Licensee to have his ban lifted. The Ineligible Player may submit the request for the removal of his disqualification in person or by registered mail or by courier service or by fax or email to any Licensee.
- 7.7. The lifting of the exclusion is lifted from the submission of the above application or the arrival of the postal delivery or the delivery of the courier service or the receipt of the fax or the receipt of the email. The data identifying the applicant for the lifting, the start of the lifting of the exclusion and the Licensee to whom the request for lifting was submitted are recorded in the relevant Register kept by the EEAEP.
- 7.8. The Licensee shall ensure that, both when submitting/receiving the declaration of exclusion and when submitting the application for its removal, it shall carry out an identity check on the declarant and shall certify on the body of the declaration or application that an identity check has been carried out and attach a copy of the declarant's identification document. The attestation takes the place of a solemn declaration pursuant to Act No. 1599/86. In case the Player does not bring/send identification documents but the Licence Holder already has the relevant documents, the Licence Holder shall attach these documents to the declaration or application.
- 7.9. The Licensee:
 - a. ensure the smooth and uninterrupted procedure of exclusion and its removal,
 - b. does not allow the Blocked Player access to the Gaming Area; c. does not

communicate programs. commercial communication to to Banned Player in any way,

- d. update the Register of Excluded Players without delay.
- 7.10. Players are registered in the Register of Excluded Players upon application by a relative of the first degree or the spouse or the person with whom the Player is linked by a civil partnership or ex officio by the NCPC, and if a relevant order has been issued by a competent authority in accordance with the applicable provisions. In this case the disqualification shall remain in force until the relevant order is lifted/revoked.

With comments [A2]: Regulatory harmonisation of exclusion periods is required for other distribution channels for the provision of gambling services (internet, monopolies etc.).

7.11. A Directive of the SCC determines and specifies the form, content and method of proof of the time of receipt of the Exclusion statements and requests for the removal of the Exclusion, as well as all details for the application of this article.

Article 8 REFUSAL OF ACCESS

- 8.1. Access to the Gaming Area is prohibited to persons:
 - a. who have not attained the age of twenty-one (21) years; b. who carry weapons.
 - c. against whom criminal proceedings have been brought, at the request of the Licensee or on their own initiative after the competent authorities have been informed by the NCPC, for an offence committed within the Gaming Area,
 - d. causing a disturbance or disturbing the order in the Casino Venue and the normal and smooth operation of the Games,
 - e. who are intoxicated or under the influence of drugs/illegal substances,
 - f. are Banned Players.
- 8.3. The Licensee may deny access to the Gaming Venue, permanently or for a specified period of time, by exercising discretion in cases relating to one or more of the following matters, to any person:
 - a. provided false or misleading information and identification data,
 - involved in a suspicious transaction or activity for which there are strong indications or suspicions of an attempt to commit or the commission of offences covered by the provisions of the legislation on money laundering and terrorist financing,
 - c. with systematic activity that constitutes a violation of the terms of the Participation Guide.
 - d. who has engaged in misconduct which has been reported to the EEAS and/or the relevant prosecution and law enforcement authorities.
 - e. who has exhibited Player misconduct that constitutes a danger to public order and safety.
- 8.4. The Licensee must inform in writing and with full justification the persons to whom it is imposing a ban on access to the Gaming Premises, as well as the period of validity of the ban. Such notification shall be made within a reasonable period of time after the prohibition has been imposed.
- 8.5. Any refusal of access and the reasons for it shall be notified without delay to the HMP and to any other competent authority as appropriate. The Licensee shall provide specific and adequate justification, setting out the relevant findings and data on the basis of which it justifies the prohibition.
- 8.6. The reasons for the prohibition and the information accompanying it shall be kept by the Licence Holder at all times, regardless of whether the prohibition has been lifted.
- 8.7. The prohibition applies only to the casino operator that imposed it, unless the NCA or the competent prosecuting and law enforcement authorities decide that the

grounds for prohibition make it necessary to register the person in the Register of Excluded Players maintained by the EEWC.

- 8.8. Persons entering the Gaming Venue in their professional capacity (such as suppliers, technicians, partners, distributors, etc.), their staff in the performance of their duties.
- 8.9. The Licence Holder shall ensure that for all persons referred to in paragraph 8.8 the following are complied with:
 - a. full identification data, as obtained from the identity card or passport or driving licence or individual health booklet of all insurance funds or equivalent identification document, as well as their permanent address,
 - b. the status of the persons (such as employee, associate, shareholder, technician, distributor, etc.) and the number of the Fitness Card, as provided for in the Fitness Regulation,
 - c. the date and time of entry and exit; d. the purpose of entry.
- 8.10. The collection and maintenance of the data referred to in paragraph 8.9 shall not be permitted for members and staff of the ECAC who enter the Site in the course of carrying out audit work or for educational purposes.
- 8.11. The alteration or deletion in any way of the information referred to in paragraph 1 is prohibited. 8.9, with the exception of data that have been changed/modified (such as, but not limited to, the number and issuing authority of the identity card, the residential address, profession and telephone number) accompanied by the corresponding documentary evidence.
- 8.12. The Licensee shall keep for the data referred to in par. 8.9. This record shall include the details of the user who made the change, the date and time of the change, the details of the change.
- 8.13. The Licence Holder shall ensure that the CFCA has unhindered and continuous access to the data referred to in this Article.
- $8.14.\,$ A Directive of the Committee may specify the details for the application of this Article.

Article 9 Eligible children

- 9.1. Games that may be organised and conducted in Casinos must be lawfully conducted in at least one Member State of the European Union or in the United States of America or in Australia or Japan or China, as well as in other countries, under the conditions, terms, technical and other specifications set from time to time by the EEWC. Rules on the conditions, terms, technical and other specifications that must be met by games that may be conducted in Casinos may be established by an EEWC Directive. Each Game and MTF shall be certified by the CRL.
- 9.2. Indicatively, the games conducted in casinos are the following: a. Black Jack or "21".
 - β. American Roulette (American Roulette).
 - c. French Roulette (French Roulette).

- δ . Banco Punto and Mini Banco Punto. e. Baccarat.
- f. Chemin de fer (Chemin de fer).
- ζ. Craps and Greek Craps. h. Poker and its

variations.

 θ . Machines with coins without a display. ι .

Coin machines with a display.

- ια. Electronic Roulette (Electronic Roulette):
 - a. with a table, an American roulette wheel spun by a croupier, and terminals; or
 - bb. without a table, with an American roulette wheel spun by a croupier and terminals; or
 - c. without a table, with an automatically rotating American roulette wheel and terminals.
- I. Any other Game and/or variations thereof, which meets the terms and conditions of this paragraph, is permitted to be conducted by casino operators in accordance with the Regulatory Framework, is described in the Participation Guide and has been certified by the EIF.
- 9.3. The Licensee is permitted to organise and conduct a new Table Game. In order for the new Table Game to be listed for conducting, the Licensee shall submit an application to the NCPC, accompanied by the following:
 - α . Evidence to support that the game to be conducted is being conducted in the accepted jurisdictions in accordance with par. 9.1 and specifying the minimum functional space required to conduct it.
 - β. A Participation Guide for the game to be conducted, which is drawn up in Greek and English, and includes all the necessary information for the participation of the Players in the game and at least:
 - aa. The brand name and the rules of play for the game to be conducted and any variations thereof.
 - bb. The terms of participation.
 - cc. The CRMs used for the conduct (type, use).
 - dd. Information about the game, such as but not limited to the categories of winnings, the maximum amount of participation, the types and frequency of bets offered, the price of participation, the method of determining the result.
 - εε. Information on the profits to be returned.
 - pst. Information on the implementation of the principles of Responsible Gambling.
 - gz. Any other information or data requested by the SCC in order to form its judgment.
- 9.4. All tables and Gaming Machines as well as wheels, tables and electronic roulette terminals are placed in the Gaming Area in such a way that they are easily accessible and controllable.

- 9.5. A "Special license for trial operation of new games on the market" may be granted by decision of the SCC, upon application of the Licensee, with a validity of up to two (2) months, in accordance with Article 15.
- 9.6. A Directive of the NECC may define the form and content of the application for the introduction of new table games and specify all details for the application of this
- 9.7. The minimum payout percentage in Games conducted with Gaming Machines is set at eighty-five percent (85%).

Article 10 DISPOSAL - destruction of technical means and materials for the conduct of games

- 10.1. In cases of removal from the Gaming Premises of any MTF, the Licensee shall submit a Notification to the NCPC.
- 10.2. For the removal of IMI, the Licensee shall draw up a protocol for the removal of IMI. This protocol shall indicate as a minimum
 - α . The time and date of removal.
 - β. The type, type, designation and quantities per IMPs removed.
 - c. The type, type, name and quantities per RMU of any RMUs replacing those removed.
 - The reasons for the removal (such as repair, maintenance, storage, destruction, sale, emergencies).
 - ε. In case of removal for repair, maintenance, storage, the place of repair, maintenance, storage as well as the day and time of scheduling.
 - f. In case of removal for destruction, the place of destination, as well as the place, day and time of scheduling of the destruction.
 - ζ. In the case of removal for sale, the place of destination, the day and time of transport/receipt and the buyer.
 - η. In the case of removal of a Gaming Machine, the protocol must include the details of the Gaming Machine's counters and the amount of the progressive Jackpot formed.
- 10.3. The protocol for the removal of a CMY shall be signed, where applicable, by the Head of the Table Games Department and/or the Head of the Gaming Machines Department. A copy of the protocol shall be kept in the relevant register of the Licensee, which shall be updated with any changes.
- 10.4. In exceptional cases (such as major failure, emergency maintenance, safety reasons), the Licensee may remove/replace TMCs with other TMCs that have been certified by the NRA, by drawing up the TMC removal protocol and informing the NRA within twenty-four (24) hours of the removal.
- 10.5. In case of destruction of playing cards (decks of cards), the Licensee shall draw up and keep the protocol for the removal of the playing cards (paragraph 10.2.), without the need to notify the NCPC.
- 10.6. A Directive of the SCF may specify the type and content of the CRL removal protocol, the exact type and manner of filing and $\frac{1}{2}$

any additional information to be included depending on the IMI to be removed and any other details necessary for the application of this Article.

Article 11 FILODORMS

- 11.1. Players are permitted, during the conduct of the Games, to tip of their own free will and initiative.
- 11.2. Employees of the Licensee may not receive tips privately or individually.
- 11.3. In Table Games, tips are received by the croupier only in cash, colour chips or value chips, except for special value chips (Junket Chips) as referred to in Article 21. In the event that a tip is given in cash or colored chips, the croupier shall exchange them for chips of equal value from the table's cashier's counter, which shall be immediately placed in the table's TIPS BOX, and the cash tipped shall be placed in the table's DROP BOX. In all other cases, tips are immediately placed by the dealer in the TIPS BOX of the tables. It is prohibited to exchange a tip with chips of a higher denomination than the tip.
- 11.4. To the employees of the other departments of the Casino, such as the Gaming Machines, Reception, catering (restaurants, bars, etc.), cashiers, currency exchange, cloakrooms, cleaning, etc., Players are allowed to tip exclusively by using POS terminals that are equipped with the relevant function for recording and monitoring tips.
- 11.5. The gratuity shall be distributed exclusively among the above-mentioned employees of the Licensee, as specified in the relevant employment contract.
- 11.6. The Licensee is not allowed to distribute tips to employees working in the closed circuit television (CCTV) and Surveillance section.
- 11.7. A Directive of the Committee may specify any necessary details for the application of this Article.

CHAPTER III

CERTIFICATES - REGISTERS

Article 12 GENERAL PROVISIONS FOR THE GRANTING OF CERTIFICATION AND REGISTRATION IN THE RECORDS

- 12.1. The Licensee shall use, for the conduct of the Games, the MTFs and/or Special Premises of a person who has received a Manufacturer's AK issued by the NECP, in accordance with the provisions of the Fitness Regulations.
- 12.2. The TMC Certification is granted by the EEAEP, upon application by the Manufacturer or the Importer Supplier, in accordance with the provisions of the Suitability Regulation.
- 12.3. The CFCA maintains a register of Certified CMEs, and posting on it is sufficient notification and proof of the existence of Certification. The register shall contain all the necessary information so that the Certifications are fully and clearly reflected. Each TMR entered in the relevant register maintained by the Authority may be used by all Licensees.
- 12.4. The NECC grants the Certification if the TMRs are in accordance with the Regulation and the Technical Specifications.
- 12.5. During the examination of the application, the ERC may contact the relevant competent authorities and bodies issuing the relevant certificates in order to verify the accuracy of their content or to request further clarifications and information.
- 12.6. The Certificates issued do not exempt the Licensee from any obligations that may arise from the applicable provisions.

Article 13 CERTIFICATION AND REGISTRATION IN THE REGISTER

- 13.1. The TMICs for which certification and registration in the EIF Registry is required are the following:
 - α. The Gaming Machines (HARDWARE).
 - β. The Games installed on the Gaming Machines, i.e. the software (SOFTWARE) as well as the operating system and its utilities (operational system, main system).
 - MTFs used to conduct table games, including roulette wheels and their subsystems.
 - δ. Electronic Table Games, including but not limited to electronic roulette and its subsystems.
 - ε. Electronic programs installed and operated on electronic table games (SOFTWARE).
 - f. The shuffling devices (shufflers), with their subsystems (HARDWARE) and all the software installed on them (SOFTWARE).
 - ζ. The systems, software programs (SOFTWARE) and auxiliary systems and subsystems used:
 - aa. for the control of the operation of Gaming, such as but not limited to MIS, Cashless systems, bonusing systems, progressive gaming systems, promo systems,
 - bb. to further control the operations of the Casino such as, but not limited to, the identification and control systems $\frac{1}{2} \left(\frac{1}{2} \right) = \frac{1}{2} \left(\frac{1}{2} \right) \left$

With comments [A3]: Legislative amendment is required in Articles 45-47 of Law 4002/2011 and in the Internet Regulation

access, digital audiovisual surveillance and recording (CCTV) systems,

- c. all kinds of computer systems, computer programs and software (SOFTWARE) used to control the operation of the casino.
- 13.2. The MTFs used by the Licensee for the Organisation and Conduct of the Games must be supplied by a Manufacturer, in accordance with the provisions of the Suitability Regulations.
- 13.3. By a Directive of the SCF, other TMRs, which are not explicitly mentioned in par. 13.1, for the installation and operation of which a Certification by the CFCA is required, IMS for which a Notification is required, other equipment for which a simple notification to the CFCA is required, the type and content of the application for IMS Certification, the related Notifications and updates, as well as to specify any other necessary details for the implementation of this Article.

Article 14 PROCEDURE FOR GRANTING CERTIFICATION OF CERTIFICATION

- 14.1. The Certification is granted by the EEAEP, at the request of the Manufacturer or the Importer-Supplier.
- 14.2. The application is a solemn declaration in accordance with paragraph 4 of article 8 of Law 1599/1986 (A 75), that all the information contained in it and those accompanying it are accurate and true.
- 14.3. The application must be accompanied by an envelope containing at least the following information:
 - α . Suitability Authorisation Code of the Manufacturer and Suitability Authorisation Code of the Importer Supplier, if the application is submitted by the latter.
 - β . Information sheet (Promotional Brochure, User Manual and Service Manual), in digital format, which includes the following:
 - aa. the type, type, trade name and issue number, where applicable,
 - bb. the rules and conditions of play in the case of a Game Certification,
 - cc. the instructions for use of the technical means and
 - material; dd. the repair and maintenance manual.
 - c. Certificate of conformity of the TMR to the Regulation and the Technical Specifications, issued by a Certification Body. If the certificate of conformity has been issued in accordance with the technical specifications of another country, the provisions of par. 2.4.
 - δ. A statement by the applicant that the IMI under consideration has not lost its certification granted abroad by a competent authority.
 - ϵ . Proof of payment of the prescribed deposit.
- 14.4. The CFCA issues the Certification of the CRA, which is valid from the date of the relevant decision, after payment of the one-off Certification fee. The duration of the Certification of IMI shall be for an indefinite period of time.
- 14.5. In the case of an application for certification of a game consisting of more than one game (multi game), the game

shall be certified as a whole, and the one-off fee shall be paid for each of the games making up the whole.

- 14.6. A new issue of an already certified IMI shall be considered a new IMI and shall be certified in accordance with the procedures set out in this Article. A new IMI is also considered a new IMI if the already certified IMI is to undergo changes related to the elements of paragraph 14.3.
- 14.7. For the granting of a TMC Certification and registration in the relevant Register, the following are paid:
 - α. A fee of fifty Euros (€ 50,00) upon submission of the application.
 - β. A one-time fee of one hundred Euro (€ 100,00) for the Certification of the MTF.
- 14.8. For the IMI that fall within the scope of the Change Management Regulation, the Licensee is obliged to comply with the provisions and procedures of the above Regulation.
- 14.9. A Directive of the ACPC shall determine the form and content of the application for certification of the IMI and specify any necessary details for the application of this Article.

Article 15 PROCEDURE FOR THE APPROVAL OF SPECIAL TEST OPERATION PERMITS FOR CHILDREN

- 15.1. Upon request of a Licensee, a "Special license for trial operation of new games on the market" may be granted, with a validity of up to two (2) months.
- 15.2. The application is a solemn declaration in accordance with paragraph 4 of article 8 of Law 1599/1986 (A 75), that all the information contained in it and those accompanying it are accurate and true.
- 15.3. The application is accompanied by an envelope containing the following documents and information:
 - α. Suitability Authorisation Code of the Manufacturer and Suitability Authorisation Code of the Importer - Supplier, if the application is submitted by the latter.
 - f. Information sheet (Promotional Brochure, User Manual and Service Manual), in digital format, which includes the following:
 - aa. the type, type, trade name and version number of the game, where applicable,
 - bb. the rules and conditions of the game; cc. the instructions $\ensuremath{\mathsf{S}}$
 - for the use of the game,
 - dd. the repair and maintenance manual.
 - β. A statement by the applicant that the game under consideration has not lost the certification granted to it in a foreign country by a corresponding competent authority.
 - c. A certificate (if issued), which is valid and which clearly shows that the game under consideration has been certified by a competent authority in a foreign country (Member State of the European Union, the United States of America, Australia, Japan, China or other countries, under the conditions, terms, technical and other specifications set by the ECCG).

15.4. A Directive of the NECC shall determine the form and content of the application for a "Special authorisation for the trial operation of new games on the market" and shall specify all the necessary details for the application of this Article.

Article 16 PROCEDURE FOR THE COLLECTION OF THE PROPOSED FEES AND FINE

The fees and charges provided for are resources of the EEA and shall be paid into a bank account designated by the Authority. Each deposit shall constitute a collection of the corresponding fee or charge and the corresponding deposit slip shall constitute a document of collection, which shall explicitly state, as a reason, the nature of the fee or charge in accordance with the relevant EEA Guidelines.

CHAPTER IV

PARTICIPATION IN THE GAMES AND CONDITIONS FOR PARTICIPATION

Article 17 PARTICIPATION IN PAIGNEAS

- 17.1. Participation in the Games is the result of free and independent personal choice and is unstimulated gambling. The Licensee shall provide Players with information on the rules of the Games, the odds of winning in each of the Games, as well as information on where to go for help in case of addiction. Such information shall be made available by the Licensee at the Licensee's Information and Help Points, on the Licensee's Website and by any other appropriate means.
- 17.2. The Licensee shall provide information to the Player regarding:
 - α . Participating in the Games in such a way that he/she makes decisions with full knowledge of the rules of the Games he/she chooses to participate in.
 - $\beta.$ The risks he/she may be exposed to from excessive exposure to $\,$ Gambling, such as loss of money and addiction.
 - c. The existing structures that provide help and support to addicted Players and their families.
- 17.3. It is prohibited for anyone to participate in the Games through surrogates.
- 17.4. Personnel of any kind and members of the Licensee's management bodies, as well as any person having the power to exercise or actually exercising dominant influence or control over the Licensee, are prohibited from participating in any way in the Games conducted by the Licensee.

Article 18 PARTICIPATION GUIDE

- 18.1. The Participation Guide constitutes a contract of membership to the Games conducted by the Licensee, within the meaning of case 11 of paragraph 3 of article 29 of Law 29. 4002/2011 (A'180). The Guide contains all the information necessary for the Participation of Players in the Games, is drawn up in Greek and English and is made available, under the responsibility of the Licensee, at the Information and Help Points, on the Website and by any other appropriate means. In the event of any conflict between the Greek and English language terms, the Greek language shall prevail.
- 18.2. The Participation Guide includes:
 - $\alpha. \ \,$ The rules of access and conduct in the Casino Area.
 - β . The restrictions, prohibitions on participation in the Games and the procedures to be followed in accordance with Articles 7 and 8.
 - c. The trade name and the rules of play for each Game or category of Games and any variations thereof, and at a minimum:
 - aa. the description of the Game or category of Games,
 - bb. the rules for the conduct of the Game or categories thereof, such as, but not limited to, the categories of winning bets, the maximum amount of participation, the types and frequency of bets offered, the Participation fee, any stake or payout limits, the method of determining the result,
 - cc. the acceptable means of participation,
 - dd. the CRMs used for the conduct (type, use),

- δ. The procedure and, where applicable, the time limit for the submission of complaints or reports by Players and how to resolve disputes.
- ϵ . Information on the application of the principles of Responsible Gaming (Responsible Gambling).
- f. The name and address of the Licensee, as well as its Website.
- ζ. The information that the organization and conduct of the Games is supervised and controlled by the EEPC.
- $\eta.$ The information that the Regulation is available at the Information and Help Points on the Licensee's and the EUEP's website.
- θ. The toll-free telephone number and support service websites.
- L. The obligations of the Licensee under the provisions of the legislation on personal data protection and the contact details of the data protection officer appointed by the Licensee
- 18.3. The Player's participation in the Games constitutes acceptance of the Participation Guide. By accepting the Guide, the Player is deemed to be aware that by participating in the Games he/she must comply with the Regulatory Framework, gives his/her express consent to the processing of his/her personal data in accordance with the provisions of the General Data Protection Regulation, his/her registration in the Excluded Players' Register under the conditions of the Regulation, and that he/she is fully aware of and unconditionally accepts the consequences of his/her registration in the Register.
- 18.4. Specific issues related to the Participation Guide may be regulated by the Licensee's internal policy (house policy), provided that it does not contradict the Guide and the applicable provisions. The house policy and any amendment thereto shall be notified to the Authority.
- 18.5. The Licensee shall submit the Entry Guide and any amendments thereto to the EEAEP. The Participation Guide, and any amendments thereto, shall become effective upon the expiration of thirty (30) days from the date of submission, unless the Authority approves its earlier effective date. In the event additional information is requested by the Authority prior to the expiration of the above time limit, such time limit shall cease to apply and shall recommence upon the submission of all requested information. In the event that the Authority takes a contrary view as to the content of the Guide, the Guide shall not enter into force.
- **18.6.** For new Games that receive a Certification, the Participation Guide will come into effect immediately upon the issuance of the Certification of the new Game.
- 18.7. Until a new Guide is issued, any errors or omissions identified in the Entry Guide are promptly communicated to the public with correct and complete information by the Licensee, at the Information and Help Points, on the Licensee's Website and in any other appropriate manner.
- 18.8. The Licensee shall inform the Authority of the exact date of entry into force of the Entry
- 18.9. The SCC may request the change or modification of some or all of the terms and conditions and rules contained in the Guidelines, giving specific reasons for its decision, either during the review of the Guidelines or even after the Guidelines have entered into force.
- 18.10. A Directive of the SCC may determine the form and content of the application for approval or amendment of the Guide for Participation as well as all details for the application of this Article.

Article 19 TRANSFERS OF MONEY - MEANS OF PAYMENT AND PARTICIPATION

- 19.1. The Licensee shall maintain a single account and a separate Player Account with a Payment Service Provider in accordance with the provisions of the Anti-Money Laundering Regulation.
- 19.2. The Licensee shall disclose the same account and the Players' account to the AML/CFT in accordance with the provisions of the Anti-Money Laundering Regulation, providing a copy of the balance of the above accounts. The current balance of the Player Account shall be included in the determination of the Licensee's cash buffer in accordance with Article 25 of the Regulation.
- 19.3. The deposit of amounts for the Participation and the withdrawal of the Player's credit balance are made by one or more of the following payment methods:
 - α. Transfer
 - β. Credit transfer c.

Debit card

- $\delta.$ Credit card
- ε. Prepaid card
- f. Electronic wallet (e-wallet) g. Cash
- 19.4. The Player participates in the Game he/she chooses, as provided in the Participation Guide, by the following means of participation:
 - α. Vouchers/Tickets b. Value

Tokens

- c. Value plates
- δ. Partner Value Chips (Junket Chips)
- ε. Player Card (magnetic, smart card, etc.) f.

Electronic Wallet (e-wallet)

- ζ. Cash
- 19.5. For Participation in Games by means of the payment instruments set out in paragraph 22.3, the following applies:
 - α . The Player is allowed, subject to the issuance of the relevant documents, to purchase at the cashier of the casino business using the means of payment of par. 22.3, the Participation Instruments of paragraph 22.4.
 - β. Junket C h i p s , after purchase from the Casino cashier, are always equivalent to cash, and may be used for betting, but may be used by the Player to purchase an equal value of colour chips from the dealer at each table, for use at tables only, as provided in the Participation Guide. Upon completion of the purchase of an equal value of suit chips, the croupier shall place the chips or value plates or Junket Chips in the table's drop box. The total value of the value chips or Junket Chips added to the drop box of each table shall be counted and included in the daily economic result.

19.6. By Directive of the SCC may include in the categories of paragraphs 19.3 and 19.4 other forms of payment and participation instruments, to determine all details of their use and management in accordance with the provisions of paragraph 19.5 and to regulate any other necessary details for the implementation of this Article.

Article 20 PARTICIPATION IN PAGNIA THROUGH SPECIAL ADVERTISING MARKS (Promo Chips/Non - Negotiable Chips)

- 20.1. The Licensee may provide to the Table Games Players, as a free promotional action, as part of an advertising expense, special promotional chips (Promo Chips/Non Negotiable Chips), through the following procedure:
 - α . For the granting/provision of special promotional brands, the Licensee shall keep an unabridged book for the provision of promotional funds, in accordance with the provisions of sub-paragraph ji' of subparagraph e' of paragraph 38.1.1.
 - β. For each act of granting/provision, the Licensee shall issue an unused triple-printed voucher for the provision of advertising funds, in which the data and information of the unused book and, in addition, the full details of the issuer (full name or surname, profession, address, tax identification number and competent tax office) shall be entered. The triplicate is signed by the Player, who receives one copy, the second copy is kept at the casino cashier's office and the third copy is kept in a separate file for the CRA.
- 20.2. The management and use of the special promotional brands is carried out as follows:
 - α . Special promotional tokens are granted to Players for their participation in any Table Game, the conduct of which is permitted in accordance with the provisions of the Participation Guide, except for those in which a tournament is conducted.
 - β . Special promotional tokens are not redeemable for money at any point (cashier, table, etc.) or with other services provided by the Licensee, are not exchangeable for other means of participation or negotiable and may not be used as a tip.
 - c. The special promotional chips, after their use for Participation in Games and at the end of each game round/round of the Game, are collected by the croupier and placed by him in the DROP BOX of the table. During the counting process and prior to the sorting of the money, the special promotional tokens are sorted and counted by number and denomination. After the completion of the counting of all the special advertising tokens on all tables, a special daily protocol for the counting of advertising tokens is drawn up in duplicate by the Licensee, showing the number of tokens by value and the total value of all the special advertising tokens counted.
 - δ. The total value of the counted advertising chips is not added and not counted in the daily economic result (gross profit) of the table games. After the end of the counting process, signing of the protocol and finalization of the daily economic result of the table games, one original daily special protocol for the counting of advertising chips, together with the counted advertising chips, shall be delivered to the casino cashier, the other shall be kept in a separate file for the NECP.
 - ε. For the production, tracking and recording of special promotional tokens of value in the book of tokens and plates of the casino, the relevant provisions of the Rules apply.
- 20.3. In the event that the Participation in the Table Games is made through the Player Card, the above procedure does not apply.
- 20.4. A Directive of the Committee may lay down any detailed rules for the application of this Article

Article 21 PARTICIPATION IN GAMES USING A SPECIAL SERIES OF CHIPS (JUNKET CHIPS)

- 21.1. The Licensee may, in accordance with paragraph 27 of article 378 of Law 4512/2018 (A 5), sell a special series of tokens of value (JUNKET CHIPS) for participation in the Table Games, through the following procedure:
 - α. For each sale of tokens made by the cashier, the Licensee shall keep an unsigned book of sale of special series of tokens of value (JUNKET CHIPS), in accordance with the provisions of sub-paragraph (e) of paragraph 38.1.1.
 - β. For each sales transaction, the Licensee issues a three-part sales slip of a special series of tokens of value (JUNKET CHIPS), in which the data and information of the sales slip are recorded and, in addition, the full details of the issuer (name or surname, profession, address, VAT number and competent tax office). The triplicate shall be signed by the Player, who shall receive one copy, the second copy shall be kept at the Casino's cashier and the third copy shall be kept in a separate file for the EDP.
- 21.2. The management and use of the special series of tokens (JUNKET CHIPS) is carried out as follows:
 - α. Special value chips (JUNKET CHIPS) are awarded to Players for their participation in any Table Game, the conduct of which is permitted on the basis of the provisions of the Participation Guide, except those in which a tournament is conducted.
 - β. The special value chips (JUNKET CHIPS) are not redeemable for money at any point (cashier, table, etc.) or with other services provided by the Licensee, are not exchangeable for other means of Participation or negotiable and may not be used as a tip.
 - c. Special value chips (JUNKET CHIPS), after their use for Participation in Games and at the end of each hand/round of the Game, are collected by the croupier and placed by him in the DROP BOX of the table. During the counting process and prior to the sorting of the banknotes, the special tokens are sorted and counted by number and denomination. After the completion of the counting of all the special tokens of all the tables, a daily special JUNKET CHIPS counting protocol shall be drawn up in duplicate by the casino with the number by value and the total value of all the special tokens counted.
 - 6. The total value of the counted special value chips (JUNKET CHIPS) is added and counted in the daily economic result (gross profit) of the casino table games. Upon completion of the counting process, signing of the protocol and finalization of the daily economic result of the table games, one original daily special protocol for the counting of special value chips (JUNKET CHIPS), together with the counted special chips, shall be delivered to the casino cashier, the other shall be kept in a separate file for the NECP.
 - ε. For the production, monitoring and recording of special value chips (JUNKET CHIPS), in the casino's book of chips and slabs, the relevant provisions of the Regulations and the relevant relevant Directives of the ECCG shall apply.
- 21.3. In the event that participation in the Table Games is through the Player Card, the above procedure is not followed.
- 21.4. A Directive of the Committee may lay down any detailed rules for the application of this Article.

Article 22 MEANS OF FINANCING THE PARTICIPATION (CASINO CREDIT)

22.1 The Licensee is permitted to provide Players with means of financing their participation in the Games (Casino Credit) in excess of ten thousand (10,000) Euros, without requiring the immediate payment of the corresponding amount by the Player, subject to the following terms and conditions:

- α. The Player submits a request for the provision of such means of funding for Participation in Games. In order to approve the application, the Licensee may request from the Player any data or information it deems necessary in order to assess the solvency and creditworthiness of the applicant, as well as the Player's written consent to the search and verification of such data or information by third parties.
- β. Για την έγκριση της αίτησης, ο Παίκτης υπογράφει σύμβαση με τον Κάτοχο Άδειας, η οποία περιλαμβάνει, κατ' ελάχιστον, την ανεπιφύλακτη αποδοχή των όρων και των προϋποθέσεων χρηματοδότησης της Συμμετοχής από τον Παίκτη, τους όρους έκδοσης, τον τύπο και το περιεχόμενο της εντολής πληρωμής της περ. γ' κατωτέρω, τις προθεσμίες πληρωμής ανά ύψος του οφειλόμενου ποσού, τα Παίγνια ή/και τις κατηγορίες αυτών για τα οποία επιτρέπεται η χρήση των μέσων χρηματοδότησης της Συμμετοχής, τον τύπο, το περιεχόμενο και την κατά περίπτωση προθεσμία υποβολής καταγγελιών ή α
- c. In order for the Licensee to provide and the Player to receive part or all of the above mentioned means of financing the Participation, the Player shall obligatorily sign a payment order in the name of the Licensee, without the right of further order, for the payment of the monetary value of the Participation means corresponding to the value he/she wishes to receive, within the time limit provided for in the contract. The payment order shall be issued by the Licensee by debiting the Player's bank account, which the Player has indicated in the application in case (a) above and to which the Player is the sole beneficiary.
- δ. The repayment of the amounts corresponding to the value of the Participation Funding Instruments provided to the Player shall be made no later than forty-five (45) days from the date of their provision. In the event of timely payment, no interest shall be charged on such amounts. In the event of late payment, the above amounts may be s u b j e c t t o legal and default interest, in accordance with the specific provisions of the contract in case b) above and the applicable provisions.
- 22.2. The Licensee shall ensure that the means of financing the Participation under this ${\sf Article}$:
 - $\alpha.$ They must be specially marked and registered in a special register kept by the casino operator.
 - β. Paid to the Player, only within the Gaming Area and provided that the Player has previously been fully identified by physical presence and signed the relevant service contract.
 - c. They are cashless, are used by the Player exclusively for his/her participation in the Games conducted by the Licensee and are exchanged exclusively with the means of participation referred to in Article 19, excluding cash.
- 22.3. It is not allowed to transfer the above mentioned means of financing the Participation to other Players or to exchange them for cash.
- 22.4. A Player may not be provided with Participation Funding Instruments if the amount corresponding to the value of corresponding instruments already provided to him/her on the basis of a previous application has not been fully repaid.
- 22.5. Player's payment orders for the amounts due for the purchase of the means of financing the Participation shall be counted as Licensee's income from the Participation of Players in the Games and shall be included in Licensee's income by.

With comments [A4]: A reduction of the threshold is required in Law 4512/2018 No. 378

on the Children's Day of use, regardless of the deadline for their repayment set in each case.

- 22.6. The Participation Funding Agreement is available in printed and electronic form at the Information and Assistance Points and on the Licensee's Website.
- 22.7. The draft Participation Funding Instrument Agreement and any amendment thereto shall be submitted by the Licensee for approval by the SSCC.
- 22.8. The Player signs the terms of the contract and any amendments thereto by physical and/or electronic means.
- 22.9. The contract file is kept by the Licensee in physical and/or electronic form for a period of at least ten (10) years.
- 22.10. The form and content of the application for the provision of the Participation financing instruments, a single model of the draft contract, the form and content of the payment order, the manner and time of keeping the relevant records and registers, the payment deadlines per amount due, the games or the categories thereof for which the use of the Participation financing instruments is permitted, as well as any other necessary details for the application of this Article, may be determined and specified by a Directive of the EEA Committee.

Article 23 INFORMATION AND INSTRUCTIONS ON BOXES

- 23.1. Any information displayed on the screen of the Gaming Machines must be written in such a font size and remain so long that the Player can read it. The information available at any time to the Player through the Gaming Machine is as follows:
 - $\alpha.$ The amount of money that, at any one time, the Player chooses to participate in the Game.
 - β. The result of the last Game Round, at the time it was completed (such as deck cards, symbol combinations, illustrations), until the next Round begins or the Player leaves the Game or requests a cash-out or redemption.
 - c. The amount of winnings from the last Game Round until the next Round starts or the Player leaves the Game or requests a cash-out or redemption.
 - δ . The Player's selections made during the last Play Cycle until the next Play Cycle starts or the amount of money involved changes.
 - ϵ . The Player's available balance.
- 23.2. Where a progressive feature (Jackpot) is conducted, there must be special information screens to inform Players, either independently or as part of the gaming machines. These screens shall, throughout the progressive mode, display at least the following information continuously:
 - a. the current date and time,
 - b. the name of the Jackpot feature,
 - c. the amount of the Jackpot, which must be updated within thirty (30) seconds of its calculation,
 - d. the fact of the Jackpot being awarded, when it occurs, in a manner perceived by the Players. The award of the Jackpot is accompanied by a distinct audio signal and the duration of the on-screen display of the award details must not be less than thirty (30) seconds. Each award must display at least the following elements:
 - aa. the exact amount of money awarded,
 - bb. the code of the Gaming Machine to which it is awarded; and

- c. the date and time of the award.
- 23.3. In the event that the Jackpot feature is interrupted for technical or other reasons, the screen should display a message (such as "Temporary Jackpot Interruption") until the feature is resumed.
- 23.4. The Licensee may install information screens which provide information about the Games, competitions and any other information of interest to Players. All information shall be true, accurate and understandable and shall not contain or be linked in any way to any information that could be considered misleading.

Article 24 OPERATING HOURS OF CACINO BUSINESSES

- 24.1. The operation of casino businesses is exempted from the applicable provisions on the hours of operation of similar businesses.
- 24.2. The operating hours of each Gaming Area may not be less than eight (8) hours per day.
- 24.3. By the end of November each year, the Licensee shall submit to the NCPC a plan for the minimum monthly operation of the number and category of table games it plans to operate for the following year. The SSC shall decide on the plan by ³¹ December each year. It shall be permitted to modify the monthly operating plan for the number and category of table games within the year of implementation, subject to the prior approval of the SSC.
- 24.4. The hours and days of holidays and the hours of operation of the casino are determined by the Licensee, who shall inform the EEPC of any change in the hours of operation at least one (1) hour prior to its implementation.
- 24.5. The Licensee shall post a list of the public holidays in a prominent place so that the public can take note of it.
- 24.6. The provisions of this Article shall not exempt the Licensee from obligations relating to working hours arising from the provisions in force.

Article 25 FINANCIAL SECURITY STOCK

- 25.1. The Licensee is obliged to pay during the Playing Day to each Player, upon the Player's request, any amount of his/her winnings or any amount he/she has allocated for the purchase of Participation Instruments and which he/she did not allocate for Participation.
- 25.2. In order to ensure the above obligation and to meet the needs of the Games, the Licensee must have a financial security reserve.
- 25.3. The security reserve shall be held by the Licensee in the following forms:
- a) cash in cage in euros and/or b) cash in bank account.
- 25.4. In order to calculate the amount of the minimum cash buffer to be held by each Licensee, the following data shall be taken into account:
 - $\alpha.$ The gross profit (GGR) of the Licensee in the previous calendar year.
 - $\beta.$ The gross profit (GGR) of the Licensee's banks in the previous calendar year.
 - c. The gross profit (GGR) of the Licensee's Gaming Machines in the previous calendar year.

- δ . The number of gaming tables.
- ε. The number of Slots for each betting category.
- f. The total amount of progressive features (Jackpot) as it was formed at the conclusion of the previous Playing Day.
- 25.5. The Security Cash Reserve (SCR) that the Licensee must maintain is derived from the formula:

 $\chi_{AAk} = (\mathcal{M}_{Kk} * 0.01) + ATk + A\Pi k + \Pi \Lambda k$

Wher

e:

k: an integer taking the values k = 1, 2,, n and corresponding to one Licence Holder.

MKk: the gross profit of Licensee k during its period of operation in the previous calendar year.

Table Reserve (ATk): the minimum required amount that the Licensee (k) is required to maintain on a daily basis for all Gaming Tables installed in the Gaming Premises.

Gaming Machine Stock (**ATIk**): the minimum required amount that the Licensee (k) must maintain on a daily basis for all Gaming Machines installed in the Gaming Premises.

Progressive Features ($\Pi \Lambda k$): the total amount of progressive features (Jackpot) of the casino (k) as it was formed by the previous Playing Day.

In the daytime.

25.6. Per calendar year, each Casino, depending on the amount of gross gaming revenue (GGR) of the immediately preceding year, is classified in one of the following economic scale tiers:

- Less than or equal to EUR 1.000.000,
- from EUR 1.000.001 to EUR 3.000.000,
- from EUR 3.000.001 to EUR 6.000.000,
- from EUR 6.000.001 to EUR 12.000.000,
- from EUR 12.000.001 to EUR 24.000.000,
- from EUR 24.000.001 to EUR 48.000.000,
- equal to or greater than EUR 48.000.001.
- 25.7. Table Games are allocated, in categories per Game, according to the relevant notifications of the License Holders.
- 25.8. Based on the gross gaming revenue (GGR) of the previous year's table games, the Casino is classified in one of the tiers of the economic scale in paragraph 25.6.
- 25.9. The calculation of the cash buffer for each Casino is carried out using the following methodology:
- 25.9.1. The average number of tables, by table game category, installed in the Gaming Venue during the previous calendar year is calculated on an annual basis.
- 25.9.2. Subsequently, for each casino, the gross gaming revenue (GGR) of each table game category of the previous calendar year is divided by the average number of tables in paragraph 25.9.1.
- 25.9.3. The sums of the average gross profit (GGR) averages in paragraph 25.9.2 of the Casinos classified in the same tier of the economic scale are then divided by the total number of Casinos in that tier.
- 25.9.4 The amount obtained according to the calculation in paragraph 25.9.3. is divided by the number of days in the year (365) and the result is the safety margin per table, per table game category, for casinos of the same economic tier.

25.9.5. The sum of the product of the amounts in paragraph 25.9.4 multiplied by the number of tables, per table game category, installed in the casino gaming area on the Gaming Day of calculation is the Daily Table Reserve (ATk) and is derived from the following formula:

$$_{ATk}=\sum_{i=1}^{a} _{Xi}\times _{Bi}$$
 (where $\pi ov\ k=1,2,\ldots,n\ i=1,2,\ldots,\alpha$)

Where:

k: is the Casino for which we calculate the minimum daily required amount to be available for all tables.

a: is the number of categories of gaming tables.

Xi: is the reserve money per table, per game category (i), for Casinos of the same economic scale.

Bi: is the number of tables, per game category (i), installed in the casino gaming area on the Gaming Day of calculation.

25.9.6. In the event that for a particular table game installed in the Gaming Venue there is no historical data for the calculation of the stock, the average of the other games is taken into account.

25.9.7. In the case of the operation of a new Casino or the relocation of an existing one, for the purposes of calculating the reserve, the Casino shall be classified in the economic scale tier of paragraph 25.6, which includes the Casinos with the smallest number of tables.

25.9.8. Slots are ranked by minimum bet amount (denomination), as follows:

- from EUR 0,01 to EUR 0,50
- 1 euro
- greater than 1 euro

25.9.9. Based on the previous year's gross gaming machine profit (GGR), the Casino is classified in one of the tiers of the economic scale in paragraph 25.6.

25.9.10. Then, for each Casino, the annual average of the number of Gaming Machines installed in the Gaming Premises during the previous calendar year is calculated.

25.9.11. Subsequently, for each Casino, the gross gaming machine profit (GGR) for the previous calendar year is divided by the average number of gaming machines in paragraph 25.9.10.

25.9.12. The sums of the average gross gaming revenue (GGR) averages in paragraph 25.9.11 of casinos classified in the same tier of the economic scale are then divided by the total number of casinos in that tier.

25.9.13. The amount obtained according to the calculation of paragraph 25.9.12 is divided by the number of days in the year (365) and the result is the security reserve per Machine of the 1st denomination, according to paragraph 25.9.8.

25.9.14. The sum of the product of the amounts in Section 25.9.13 multiplied by the number of Gaming Machines installed in the Casino Gaming Area on the Gaming Day of calculation is the Daily Gaming Machine Inventory $(\mathcal{A}\Pi k)$ and is derived from the following formula:

$$_{ATR}=\sum_{i=1}^{\beta}y_{i}\times_{Ci}$$
 (where $\pi ov\ k=1,2,\ldots,n\ i=1,2,\ldots,\beta$)

Where:

k: is the Casino for which the minimum daily required amount is calculated for the total number of Gaming Machines,

b: is the number of Slot Machines classified in the same bet amount category.

Yi: is the cash buffer to be held in category (i) per Gaming Machine, on a daily basis, by all Casinos belonging to the same tier of the economic scale.

Ci: is the number of Gaming Machines installed in the Casino Gaming Area on the Gaming Day of calculation.

25.9.15. In the case of the operation of a new Casino or the relocation of an existing Casino, for the purposes of calculating the stock, the Casino shall be classified in the economic tier of paragraph 25.6, which includes the Casinos with the smallest number of Gaming Machines.

25.9.16. For the calculation of the 2nd category (denomination), for each Machine of this category, the amount resulting for the 1st category is multiplied by a factor of 2.00.

25.9.17. For the calculation of the 3rd denomination, for each Machine of this category, the amount resulting for the 1st category is multiplied by a factor of 4.00.

25.9.18. The Progressive Feature cash reserve $(\Pi \Lambda k)$ on the Playing Day of calculation is the amount of such Features that has been formed at the close of the immediately preceding Playing Day at each casino. For the purposes of

in calculating the cash reserve, the individual progressive operations which, at the close of the immediately preceding Children's Day, amount to an amount equal to or greater than five hundred (500) euros shall be counted.

- 25.10. In case of seasonal operation of a Casino, χ_{AAk} is calculated individually for that Casino, following the above calculation method.
- 25.11. The Licensee must complete, on a daily basis, a calculation table of the Security Cash Reserve (XAAk) and communicate it to the NECP, without delay, at the beginning of the Children's Day.
- 25.12. The amounts in the Players account. held by the Licensee, in accordance with the provisions of the Anti-Money Laundering Regulation, shall be included in determining the security reserve under this Article.
- 25.13. A Directive of the Committee may specify any necessary details for the application of this Article.

Article 26 TERMS AND CONDITIONS OF PROMOTIONAL OPERATION (JACKPOT)

- 26.1. The progressive mode (Jackpot) is divided into:
 - α . Stand-Alone Progressive Jackpot feature; is the gradual parallel increase of the maximum reward limits of a Slot Machine, which is not part of a group of Slots, in proportion to the value of the Participations in that Slot Machine.

 - c. Wide Area Progressive Jackpot is the progressive jackpot feature. feature two $\acute{\eta}$ of two or more interconnected Gaming Machines installed in more than one (1) casino.

- 26.2. The progressive mode (Jackpot) shall comply with the Technical Specifications and any applicable requirements of this Article and shall receive the approval of the CRA in accordance with Article 27.
- 26.3. Slot machines that are connected to a progressive feature (jackpot) have Games with the same denomination installed on them. The probability of the top award hit rate in each of the Games participating in the progressive feature is allowed to have a positive deviation of up to five percent (+5%) from the Game with the lowest probability.
- 26.4. For each Game conducted through Gaming Machines and participating in the progressive mode, the following shall be examined in detail by the NECC:
 - α. Multi-Level Jackpot Count.
 - β . Details of the Jackpot design, depending on how it is implemented. c. Terms and conditions for achieving a win in each Jackpot.
 - d. Next Jackpot restart amount.
 - ε. Maximum Jackpot amount.
 - f. Percentage of participation in the progressive increase of the Jackpot amount.
 - ζ. How to manage the funds collected after the maximum Jackpot amount is reached, so that they can be channelled into Jackpot pools.
 - η. Expected levels of activation values.
 - θ . Secondary percentages that are channelled into Jackpot pools.
 - ι. Methods of settlement.
- 26.5. The Wide Range Progressive (Jackpot) feature meets the following conditions:
 - α . The Jackpot amount can either be a fixed amount of money or it can be increased progressively, depending on the amounts of money played and offered on more than one Slot Machine in the same or several casinos. Simultaneous Jackpot operation of multiple payout levels is allowed.
 - β. Each Gaming Machine participating in a wide area progressive feature (Jackpot) is uniquely identified by the Licensees. This information shall be readily accessible to any audit by the NCPC.
 - c. The progressive counter of the Wide Range (Jackpot) feature displays the total amount of money within thirty (30) seconds from the time the amount of money is refreshed in the CPSM. In case there is a specific refresh rate of the progressive counter, it displays the total amount of money as soon as it receives an update from the CPSM.
 - δ. The method by which the values of the wide area progressive mode (jackpot) parameters are created or modified must be secure. The Jackpot shall be monitored and controlled by the CPSM, but may be controlled by any appropriate system connected to the CPSM, certified for this purpose, and which, inter alia, ensures:
 - aa. the control of the communications between the Gaming Machines and between the Gaming Machines and the CSPs, $\,$
 - bb. the calculation of progressive amounts of money and attributed profits
 - c. informing Players of the progressive amount and the winnings awarded.

- 26.6. The Licensee, participating in a progressive operation (Jackpot) of a wide area, shall have, for the information of the Players within the Gaming Area, at least a special information screen.
- 26.7. The group of interconnected Gaming Machines of all Casinos participating in the wide area progressive (Jackpot) mode consists of Gaming Machines that have Games with the same denomination installed on them. The probability of the top award hit rate of each of the Games participating in the wide area progressive Jackpot feature must be equal to the probability of the top award hit rate of all other Games participating in that feature.
- 26.8. The Licensee shall ensure that, in any case, the respective amount (value) of the progressive features (Jackpot) is available for allocation to the Players at any time.
- 26.9. The Licensee shall notify to the CFCA:
 - α. The cancellation of the progressive mode (Jackpot). In this case, the accumulated increment amount, in addition to the startup amount, is transferred and added to the next or another current progressive mode within fifteen (15) business days.
 - β. The reduction of the value of the progressive mode (Jackpot) as it is formed. In this case, the value by which the Jackpot is reduced is added to the next or another current progressive mode, within fifteen (15) working days.
 - c. The part of the configured value of the progressive feature (Jackpot) that is not awarded to the Player due to exceeding the maximum payout limit of this feature. In this case, the excess value is transferred and added to the next or another current progressive feature within fifteen (15) business days.
- 26.10. All transfers of value of Progressive Features (Jackpot), as provided in paragraph 26.9, shall be transferred and added to the next or another current Progressive Feature, within an exclusive period of ten (10) days. The Licensee shall notify the NPC of the Progressive Feature (Jackpot) to which it has added such amounts, with specific reference to the Progressive Feature of origin.
- 26.11. In all cases of modification or cancellation of progressive features (Jackpot), the Licensee shall inform the Players via the screens of the Gaming Machines or screens in the Gaming Venue, as well as by any other appropriate means.

Article 27 APPROVAL OF PROMOTIONAL OPERATION (JACKPOT)

- 27.1. The Licensee shall notify the CRA of the conduct of a progressive operation (Jackpot) of cases a' and b' of paragraph 26.1, together with the values of the parameters thereof.
- 27.2. In order to conduct the wide area progressive operation (Jackpot) of paragraph 26.1 (c), the Licensees participating in it shall jointly submit an application together with the values of its parameters. The NECC shall issue a decision on the application no later than thirty (30) days after its submission.
- 27.3. The NECC may, at any time, revoke a progressive operation (Jackpot) when it finds that it is conducted in a manner contrary to the terms of the approval, the applicable provisions or the Regulation.
- 27.4. The type and content of the Notification of Progressive Functions (Jackpot), the transfer/addition of the progressive functions (Jackpot), the transfer/addition of the

of the modulated values of these functions in other progressive functions, the content and supporting documents of the application for approval of a wide-area progressive function (Jackpot), the manner and content of informing the Players, as well as to specify any other details for the application of this article.

Article 28 COLLECTION AND COLLECTION

The counting of the means of Participation in the Games is as follows:

- α. After the end of the Children's Day, the Drop Boxes are collected, in the presence of the casino manager and an employee of the security and are transferred locked to the special counting area of the casino, where they are kept until the start of the counting and are continuously monitored by the Closed Electronic Audiovisual Surveillance System of the Casino.
- β. The counting room is an indoor, windowless, air-conditioned, equipped with an ionisation device, inaccessible from the outside and equipped with a security door. Entry and exit to the area shall be by means of an electronic security system (electronic entry/exit registration cards). The area is fully covered by the Closed Electronic Audiovisual Surveillance System. The counting area shall be equipped with a table made of transparent material (glass, PLEXIGLASS, etc.), seating and money counting equipment.
- c. Counting officers shall be required to wear a uniform uniform, which shall not have pockets or other pockets and the sleeves of which shall be short or, if long, have an elastic band at the end.
- δ. Each box is unlocked and opened by a casino employee individually. At the same time, the number of the table or slot machine from w h i c h the opening box originates shall be announced. The box is emptied completely onto the table and then displayed to the cameras recording the count to ensure that it is now completely empty. The box is then locked and removed from the table. The money and other means of participation shall then be sorted by value and counted by the automatic machines. Each individual value total is pronounced and recorded by the counting clerk. This process shall be repeated until the contents of all boxes have been counted and recorded.
- ε. The counting area shall be monitored and recorded by the Casino's Closed Electronic Audiovisual Surveillance System twenty-four (24) hours a day and the audiovisual data recorded, including the counting actions, shall be kept by the Casino for at least sixty (60) days.

CHAPTER V

COMMERCIAL

COMMUNICATION Article 29

COMMERCIAL COMMUNICATION

- $29.1. \ \,$ The Licensee must comply with the provisions of the Commercial Communication Regulations.
- 29.2. It is not allowed to use in any way the Player's details and the Player's Playing Activity for Commercial Communication purposes, without the Player's consent.
- 29.3. No Commercial Communication material may be made available in any way to Excluded Players in accordance with Article 7. This prohibition shall commence no later than twenty-four (24) hours after the Player has been placed in a Disqualified status.

- 29.4. The SCC may impose the immediate cessation of any Commercial Communication activity that is contrary to the Gaming Regulation, the terms of the License and the applicable provisions.
- 29.5. Any information provided to consumers and Players is true, accurate and understandable and does not contain or is in any way connected with any information that could be considered misleading.
- 29.6. The Licensee may carry out Commercial Communication on the Website, on the websites of its Partners (junkets) as well as on accounts maintained, developed and created by itself or its Partner (junket) on social media, provided that the social media provides special filters and applications to block access by persons under the age of 21 and in accordance with the specific provisions of the relevant provisions of the Gaming Regulation and the relevant EEIG Guidelines.

CHAPTER VI

PROTECTION OF PLAYERS

Article 30 PROTECTION OF THE IDENTITY OF PLAYERS

The Licensee shall ensure that members of its management, its staff, as well as those who have an employment, work or commission relationship with it, shall not disclose the identity of persons whom they know to be Participants in the Games or to have made any profit or lost any amount of money as a result of their participation in the Games, without the prior written consent of such persons. Such consent shall not be required where such information is provided to the EIF, the relevant law enforcement and prosecuting authorities or where otherwise required by applicable law.

Article 31 CONTRACTS

- 31.1 The Licensee shall implement an effective system for handling complaints from Players, which it shall notify to the Authority, and shall keep a record of such complaints, accessible by the SIRC at such time and in such manner as the Authority may determine.
- 31.2. A complaint form is available at the Information and Help Points. The form must be completed and signed by the complainant and submitted to the casino together with the relevant material, when available and if available. The complaint must be accompanied by a copy of the complainant's Identity Card or Passport and shall include at least:
 - α . Full name and maiden name b.

Date of birth

- c. Valid Identity Card or Passport number
- $\delta.$ Full address of permanent residence, as well as the address and method of sending the reply
- $\epsilon.$ A description of the allegations, together with any evidence supporting the Player's allegations
- 31.3. The Player's complaint shall be filed, at the latest, within 48 hours from the time the event complained of occurred. The Licensee shall keep the audio-visual recording of the incident complained of and other evidence related to the complaint until the dispute is finally resolved, in accordance with the provisions of this Article, the relevant provisions of the Rules and the relevant EEOC Guidelines on these matters.
- 31.4. The Licence Holder shall examine the information contained in the complaint and in any case shall inform the complainant about the allegations contained in the complaint within ten (10) days of its submission.

- 31.5. If the Licensee's response is not satisfactory to the complainant, the complainant may request, within ten (10) days from the day following the day on which the Licensee's response is sent to the complainant, that the complaint be reviewed by the NCA. The request for review shall be communicated to the Licensee, who shall promptly forward all relevant information concerning the complaint to the ACPC.
- 31.6. A Directive of the SCC may determine the form and content of the complaint form, add information for the purpose of classifying the thematic categories of complaints, determine the form and content of the notification to the SCC of the complainants and the data supporting the positions of the interested parties, determine the form and content of the submission by the Licensee of periodic reports on the complaints and specify any other details for the application of Article a

Article 32 PROTECTION OF PERSONAL DATA

- 32.1. The Licensee shall act as a Data Controller within the meaning of para. (7) of Article 4 of the General Data Protection Regulation (Reg (EU) 2016/679), and must comply with the applicable legislation on personal data. In addition to the technical and organisational measures provided for by such legislation, the Licensee shall specifically take appropriate preventive measures to prevent access to data allowing the identification of Players by technical or other means that could reasonably be used by unauthorised third parties. In addition to the sanctions provided for in the personal data legislation, in the event of a breach of the confidentiality of the data and/or the obligation of confidentiality, the administrative sanctions provided for in Article 51 of Law no. 4002/2011 (A' 180).
- 32.2. The restriction, in whole or in part, of the right of access of the data subject to the personal data concerning him or her is allowed in cases where the Licensee, the EHRC, the other competent authorities, as well as those who process the aforementioned data, are fulfilling their duties for the purposes of this Law, in such a way as not to hinder the carrying out of investigations, analyses or procedures, in accordance with the provisions of Article 33 of Law No. 4624/2019 (A' 137).

Article 33 CARE FOR PERSONS WITH DISABILITIES

The Licensee must comply with the applicable laws and regulations in order to ensure the accessibility of the Casino Premises for persons with disabilities.

CHAPTER VII

SUPERVISION - COMPLIANCE

Article 34 INTERNAL OPERATING RULES

- 34.1. The Licensee shall have internal operating rules in order to ensure compliance with the law, the revenue of the State, the smooth operation of the Games, the uninterrupted operation of the Gaming Facilities and any type of gaming equipment, the continuous performance of their activities, and in particular to ensure:
 - a. to minimise the risk of damage to the interests of the Players from any conflict of interest with those of the Licensee, its executives, its affiliated persons or other Players,
 - b. conditions of transparency as to the operation and integrity of the organisation and conduct of the Games,
 - c. monitoring the operation of gaming machines and table games in order to prevent the development of fraudulent methods and, in general, to prevent fraud, suppress crime and prevent money laundering from illegal activities, ensure the integrity of the Games and, in general, the regular, uninterrupted, controlled and safe operation of the Games,

- d. the control and security of data processing,
- e. the unhindered and easy control, by the NCPC, of the Licensee's activity and any influence by the persons referred to in paragraph 1 of article 364 of Law No. 4512/2018 (A 5) that could be detrimental to the prudent and sound management of the Licensee,
- f. the organisation of procedures and methodology for the identification, prevention and mitigation of risks,
- g. the implementation of appropriate policies and procedures to adequately ensure that the Licensee, including its officers, employees and staff in general, comply with their obligations under the applicable provisions, as well as the rules for the conduct of transactions.
- 34.2. The rules of procedure shall include, as a minimum:
 - α . A fully developed organisational chart, at all levels of the hierarchy and a distinction between primary and secondary tasks. The organisation chart shall clearly identify the area of responsibility by sector, division and post.
 - $\beta.$ Description of tasks and development of procedures for all activities per organisational unit.
 - c. Structure of the representation of the Licensee and its officers vis-à-vis the Authority, based on position and duties, including the delegation of authority to officers, the signature rights arising from such delegation and the organisation of the deputising of persons in specific positions.
 - δ . Internal Audit procedures to assess the effectiveness and efficiency of individual systems and functions, such as:
 - aa. administrative operational control,
 - bb. checking compliance with the Regulatory Framework,
 - c. the financial accounting control and the monitoring of the relevant inputs and outputs.
 - ϵ . Procedures for informing the Hellenic Republic and the competent authorities about the tax and contractual obligations and tax and royalty obligations of the Greek public and its beneficiaries.
 - f. Procedures for managing equipment and ITCs for their operation, safety, security, integrity, legality and efficiency, as well as policies and procedures for recording and tracking equipment and ITCs installed or removed from the Casino Venue.
 - ζ. Recruitment procedures and background checks of executives and staff as well as verification of relevant data.
 - η. Analysis of the risks of conflicts of interest and the general development of illegal behaviour in the organisation and conduct of the Games and description of the relevant mitigation factors and/or mitigation measures related to the above risks.
- 34.3. The operating rules, as well as any amendment thereto, shall be approved by the EEAEP upon request of the Licensee.
- 34.4. A Directive of the Committee may specify any necessary details for the application of this Article.

Article 35 Staff training

35.1. The Licensee shall inform, train and educate the executives and staff involved in the organisation and conduct of the Games in relation to.

with the applicable provisions, the Gaming Regulation and the Regulation and to ensure the participation of the above in specialized education and training programs in the relevant subject.

- 35.2. The Licence Holder shall implement appropriate evaluation procedures for the training and education programmes it organises for its staff and personnel.
- 35.3. The Licence Holder shall appoint a training officer who shall be responsible for keeping a complete and up-to-date record of the data related to the education and training programmes it organises, and shall inform the CECP, without delay, upon request.

Article 36 REPORTING REQUIREMENTS

- 36.1. The Licensee shall provide the following to the EEA, at the time and in the manner specified by the Authority:
- 36.1.1. At the end of each calendar quarter of the year, a report on the management and operation of the Games, including a quantitative and qualitative report:
 - a. The forms and means of Commercial Communication carried out and the corresponding costs.
 - β. Data concerning the recording of complaints, grievances, requests or queries from the public, the corresponding actions and the time taken to deal with them.
 - c. Data relating to outages, malfunctions or failures of IT systems, IMI, software applications, structures, procedures and the corresponding actions and the time taken to deal with them; and
 - δ. Any studies, surveys or reports relating to the market for Games, consumer preferences and behaviour, the conduct of Games and their operation.
- 36.1.2. Access, at any time, to their premises, as well as to any system related to the conduct, supervision and control of the operation of the Games, by bodies authorised by the NECC, ensuring that all requested information is provided.

Article 37 FILE KEEPING

- 37.1. The Licensee is required to keep electronic records and registers of the Rules, the Gaming Regulations, and any other records and registers with the analysis and periodicity specified by the NCPC. The maintenance of electronic records, and registers and books shall apply at a minimum:
 - α. Players (such as number of new members, number of members in loyalty programs, number and data of Excluded Players, attempts to violate exclusions, removals of exclusions, number of people who requested support).
 - β. Financial/tax obligations (in accordance with the relevant decisions and the applicable provisions on the visa provisions of the C.B.S., concerning the determination of the documents of casino operators for their transactions in the conduct of Gambling, with and/or without the use of electronic money transaction systems, at tables and gaming machines and at any terminals).
 - c. Financial reports (reporting of net winnings/revenues for each Game, detailed transaction reports including coupons and cards, cashier reports, etc.).
 - δ. Progressive operations (Jackpot) [detailed and concise progressive operation report showing the total Jackpot (consisting of the starting amount and the increment amount), balance sheet report, payout report clearly showing the methodology for calculating the payout amount including:

- aa. the credits that contributed to the Jackpot (starting from the cash weighting cycle immediately after the previous Jackpot); and
- bb. all credits of the cash accumulation data cycle up to the time the Jackpot was awarded, etc.).
- ε. Complaints (data relating to the recording of complaints, grievances, requests or queries, the respective actions and the time taken to deal with them, transmission of data to the EEPR, etc.).
- f. Commercial Communication (forms and means of Commercial Communication carried out per approved Commercial Communication plan, the corresponding budget and account of the relevant expenses, e t c .).
- ζ. Register of TMKYs (TMKY data, by type and type, which Licensees have installed and operate, regardless of whether certification is required for them).
- η. Notifications, approvals, updates [installation, launch, interruption, malfunction, removal, maintenance, storage, destruction, replacement of the MTF, hours of operation, Participation Guide, new Games, progressive features (jackpot), etc.].
- θ. Personnel (Eligibility Licences, data of executives, employees and persons, status, duties-competencies, trainings-training - certifications, conflict of interest issues, background checks, criminal status, etc.).
- ι. Audiovisual material in accordance with the provisions of the Regulation.
- 37.2. Without prejudice to the provisions of the Audiovisual Material Regulation, the Licensee shall keep the information referred to in paragraph 37.1 for at least ten (10) years in a medium that allows the information to be stored in a form and manner that meets the following criteria:
 - $\alpha.$ Any corrections or other modifications, compared to the pre-existing form, must be clearly visible and fully traceable.
 - β. Provide the NCA with direct and easy access to these records, through the interconnection of the NCA's IT systems with the Licensee's IT systems and/or in the manner, time, periodicity and analysis specified by the Authority.
- 37.3. Certain records may be kept in paper form, upon documented request by the Licensee and subject to the approval of the NRA.
- 37.4. The start of the period of obligation to keep records is defined as the day following the day on which the information to be archived is created.
- 37.5. The movement, management and filing of documents between the NCPC and the Licensee. To this end, the Licensee shall be required to have digital signatures for the electronic movement and management of documents.
- 37.6. In order to ensure the integrity of the above mentioned data, the Licensee is obliged to use modern encryption methods.
- 37.7. A Directive of the E.E.E.P. may add registers, records, reports and related fields that the Licensee must maintain, define the manner, form and specifications for their maintenance and periodicity, define the bodies accepted in Greece for issuing digital certificates related to the functions and procedures of this article and specify any other detail for the implementation of the provisions of this article.

Article 38 Forms and references to children

38.1. Without prejudice to the fact that, upon the Licensee's documented request, certain records may be kept in paper form, the Licensee shall keep electronic records of at least the following:

- 38.1.1. **Gaming Table Forms.** The Licensee shall have and maintain for each table forms (book forms), in the Greek language, in accordance with the applicable provisions, as follows:
 - α . Initial advance payment slip,
 - β. Additional advance payment slip,
 - c. Closing (result) statement; and d. Bank

book (register).

- ϵ . The following forms, vouchers or books:
 - aa. A **chip or plate change form**, per table, between the table cashier and the casino cashier. This form shall be kept for each table separately and shall be used in cases where, as a result of the table's cash flow, it is necessary to change some of the chips or tokens with other chips or tokens of a different denomination. The total denomination of the tokens or chips exchanged between the table cashier and the casino cashier shall be the same.
 - bb. Daily aggregated closing (result) report of all casino tables (with a breakdown by table). This report shall include, in aggregate, the detailed result data as derived from the certified daily triple report of the closing (result) of each table. The entry of the data on this sheet shall be made in the order of the ranking (grouping) of the tables for each different type of table game played.
 - cc. Monthly aggregated closing (result) report of all casino tables. This sheet shall record, for each day of each month, the total amount of money (cash) received from the players of the tables ("DROP"), as well as the result (Gross Win, "WIN"), for each different type of table game played.
 - dd. Annual aggregated closing (result) report of all the casino tables. This sheet shall record, for each month of the year, the total amount of money (cash) received from the Players at the tables ("DROP"), as well as the result (gross win, "WIN") for each different type of table game played.
 - g. Book of tokens and table value plates. This book shall record, in detail, all information relating to the acquisition (supply) and disposal (distribution) of each type of token and plate, and in particular, for each type of token or value plate, the following information shall be recorded in chronological order:
 - Date of acquisition
 - Manufacturer or Importer
 - · Purchase invoice number and date
 - · Quantity acquired
 - Nominal acquisition value
 - Release date, for use at the casino cashier
 - Acceptance delivery record/date
 - Delivery Receipt Delivery Quantity
 - Nominal value of delivery receipt

During the initial application of the bookkeeping, all acquisitions and disposals of tokens and value plates up to the publication of this document shall be recorded beforehand.

pst. **Bearing colour brands.** This book shall record, in detail, all information relating to the acquisition (supply) and disposal (distribution) of the colour tokens. For each type of colour brand, each

of a different table, the following information shall be entered in chronological order:

- Brand colour
- Destination table (table number)
- Date of acquisition
- Manufacturer or Importer
- Purchase invoice number and date
- Acquisition Quantity
- · Release date, for use at the casino cashier
- Acceptance delivery record/date
- Delivery Receipt Delivery Quantity

At the time of the initial application for the keeping of the register, all acquisitions and disposals of paint brands up to the date of publication of this Regulation shall also be entered in advance. If this is not possible, the Licensee shall take a complete inventory and further changes shall be recorded after the inventory. In any count or inventory, the result of the inventory, for each type of value brand or plate and color brand, shall not be greater than the corresponding cumulative total of dispositions. Similarly, the aggregate total of disposals may not be greater than the aggregate total of acquisitions.

gz. **Table Games Department staff book.** This book shall record the full details of all Casino employees involved in supporting and meeting the needs of the operation and operation of Table Games (not including staff with catering duties).

heh. **Table Games Maintenance Book**. This book shall record, in chronological order, any repair, maintenance, storage, replacement, destruction, sale, as well as any replacement of spare parts and the type of spare parts, including the replacement of the felt, for each casino table.

- aa. These operations must be supported, each time, by a specific record indicating the number of the table, the part of the table repaired or maintained, replaced, stored, destroyed, sold, the description of the work carried out and the spare parts used.
- bb. This special protocol is signed by the head of the casino's table games department, the licensed technician and the maintenance officer of the relevant department present during the maintenance under the cover of a camera.
- cc. Simultaneously with the above actions, the bank book (register) is updated with the corresponding changes.
- dd. The cleaning and maintenance of felt or wooden and bronze peripheral and/or decorative parts of the table is not subject to the above procedure.
- th. Register for the redemption of tokens of value in the name of Players under paragraph 2 of article 30 of Law no. The following data and information shall be recorded in this register for each transaction of redemption of tokens, in compliance with the provisions of the Combating Regulation:
 - The serial number of the token payment transaction.

- · The date of the token payment transaction.
- The full name, ID Card or Passport number and address of the Player to whom the payment of tokens is made.
- The total amount of tokens of value paid.
- The number of tokens of value redeemed, per different denomination.
- j. **Book of Promo Chips/Non-Negotiable Chips.** The following data and information shall be recorded in this book for each transaction of provision:
 - The serial number of the instrument of supply.
 - The date of the act of supply.
 - The full name, ID or Passport number and address of the Player to whom the benefit is granted.
 - The total amount of the benefit.
 - The number of special promotional tokens issued, per different denominations.

laia. A book of sales of a special series of tokens of value (Junket chips). The following data and information shall be entered in this book for each sale of tokens made by the cashier:

- · The serial number of the sales transaction.
- · The date of the sale transaction.
- The full name, ID or Passport number and address of the Player to whom the sale is made.
- The total monetary amount of the value of the tokens of the sale.
- The number of these special tokens sold, by different denominations.
- **38.1.2. Gaming machine forms.** The Licensee shall keep for all Gaming Machines, in accordance with the applicable provisions, forms (data sheets), in Greek, as follows:
 - $\alpha.$ Filling slip for Machinery (initial or additional). b. Extraordinary winnings slip (Jackpot).
 - c. Gaming machine result sheet. d. Book (register)

of gaming machines.

- $\epsilon.$ The following forms, vouchers or books:
 - aa. **Unopened supplementary book (register) of gaming machines.** The Licensee shall keep an unopened supplementary register of Gaming Machines, in which, for each Gaming Machine installed and operating in the casino, the following information and changes to this information shall be recorded in chronological order:
 - The name of the Manufacturer.
 - The country of manufacture.
 - The serial production number.
 - The month and year of manufacture.

- The type (model) of construction (HARD WARE).
- The type, type and trade name of the electronic Game (SOFTWARE) installed on it.
- The "ERROME ID" or "UNIUQE NAME" or "UNIUQE CODE" printed in the basic ERROME memory (BASIC or GAME ERROME) of the electronic Game.
- The "CHECKSUM" of the above EPROM base memory.
- The "GAME CYCLE" of the Electronic Game that the casino chooses to use at any given time from those available in the above EPROM (if the EPROM has more than one GAME CYCLES).
- the theoretical payout percentage of the Electronic Game which of the available options in the above EPROM the Casino uses at any one time (if the EPROM has more than one option).
- The value of the minimum starter (point, credit unit, DENOMINATION) set by the casino at any given time.
- The decision granting the certification of the gaming machine and the electronic game installed on it.

bb. The Licensee shall also keep the following unauthenticated forms, vouchers or books:

- Monthly aggregated score sheet of all casino machines. This report
 includes, for each day of each month, the total value of the points (credit
 units) purchased by the Players ("DROP"), as well as the result (Gross Win,
 "WIN") for all the Gaming Machines.
- Annual aggregated closing (result) report of all casino machines. This sheet
 records, for each month of the year, the total value of points (credit units)
 purchased by the Players ("DROP"), as well as the result (gross win, "WIN"),
 for all Gaming Machines.
- Playing Machines Department staff book. This book records the full details
 of all casino employees involved in supporting and meeting the needs of the
 casino:
 - the conduct of online gambling,
 - the operation of Gaming Machines.
- Game Machine Maintenance Book. For each Gaming Machine, the casino keeps a special maintenance book, which is kept locked inside each Gaming Machine. This book shall record the full details of the Gaming Machine as referred to in this Article, any repair and maintenance of the Machine, in chronological order (date and time), as well as any replacement of a spare part and its type.

Each entry in the Machine Maintenance Book is signed by the Licensed Technician and the Head of the Electronic Gaming Department under camera surveillance. In addition to the updating of the maintenance book, a special protocol shall be drawn up for each of the following cases:

- Replacement of one or more of the existing electromechanical meters. The special protocol shall indicate:
 - i. the latest available readings of the damaged cash,

- ii. the indications of the new cash; and
- iii. the time and date of replacement.
- Replacement of "EPROM" memory (other than the basic EPROM). The special protocol shall specify:
 - i. the number of the replaced EPROM,
 - ii. the number of the new EPROM, and
 - iii. the time and date of replacement.
- Replacing the basic EPROM (BASIC or GAME EPROM) of the electronic Game with another, exactly the same EPROM. The special protocol states:
 - The "EPROM ID" or "UNIQUE NAME" or "UNIQUE CODE" of the overwritten EPROM memory of the electronic Game.
 - The "EPROM ID" or "UNIQUE NAME" or "UNIQUE CODE" of the new EPROM memory of the electronic Game.
 - iii. The "CHECKSUM" of the overwritten EPROM memory.
 - iv. The "CHECKSUM" of the new EPROM memory.
 - v. The "EPROM ID" and "CHECKSUM" of the replaced and the new EPROM shall be the same.
- Replacing the basic EPROM (BASIC or GAME EPROM) of the Electronic Game with another, different EPROM, to modify, upgrade or replace the installed Electronic Game. The special protocol shall specify:
 - The type, type and brand name of both the originally installed Electronic Game and the newly installed Electronic Game.
 - The "EPROM ID" or "UNIQUE NAME" or "UNIQUE CODE" of the overwritten EPROM memory of the electronic Game.
 - iii. The "EPROM ID" or "UNIQUE NAME" or "UNIQUE CODE" of the new "EPROM" memory of the electronic Game.
 - iv. The "CHECKSUM" of the replaced "EPROM" memory.
 - v. The "CHECKSUM" of the new "EPROM" memory.
 - vi. The "EPROM ID" and "CHECKSUM" of the replaced and the new "EPROM" are different.
 - vii. The Certification of Electronic Gaming.
 - viii. The time and date of the above replacement of the old Electronic Game
- Deleting the contents of RAM (RAM CLEAR) to restore the operation of a Gaming Machine. The special protocol shall state:
 - i. The reason for the necessity of the action,
 - ii. the last pre-deletion readings of at least the system meters; and
 - iii. The time and date of the "RAM CLEAR" action.

In all of the above cases, the special protocol is signed by the licensed Technician and the Head of the Electronic Gaming Department under camera coverage. A copy of the same aforementioned protocol shall be attached to the maintenance book of the Gaming Machine or to a special file of the Electronic Gaming Department. At the same time as the above actions are taken, the following shall be notified

similar changes and the unopened supplementary register of Gaming Machines. In any case where the repair and maintenance is carried out on the central processor "C.P.U." of the gaming machine, both the unlocking of its door or cover and its securing after the work has been completed shall be recorded with the number of the new plastic fuse or security sticker of the

"C.P.U." in the maintenance book. The cleaning and maintenance of wooden, metal and other peripheral and/or decorative parts of the Gaming Machine shall not be subject to the above procedure.

- **38.1.3. Gratuity reports.** The Licensee shall keep for all Gratuities, in accordance with the applicable provisions, forms (vouchers books), in the Greek language, as follows:
 - aa. **Daily tip sheet.** In this sheet are recorded, for all tables, the detailed data of the tips, i.e. the tip at each table and the tips served through the special terminals (POS) per day.
 - bb. **Monthly bank tip sheet.** This bulletin records, for each day of the month, the total monthly value of tips, i.e. the tips given for all banks and the tips given through the special terminals (POS), within the reporting period.
 - cc. Annual table gratuity bulletin. This report shall record, for each month of the year, the total annual value of tips, i.e. the tips given for all banks and the tips given through special POS terminals within the reporting period.
- 38.1.4. A special register of markers for the financing of participation in the Games (credit line). The following data and information shall be recorded in the register for each financing made:
 - $\boldsymbol{\alpha}.$ Details of the application for funding of the participation.
 - b. Details of the participation financing agreement.
 - c. Details of the payment orders, including the bank account debiting the payment amount, which the Player has indicated in the funding application, of which the Player is the sole beneficiary.
 - d. Data on financing instruments (markers).
- 38.1.5. **CSFP references.** The CSFP, in each case and in addition to the relevant TEPs, has the following capabilities:
 - α . Issue a balance sheet of the Gaming Machines, for each day of operation, with all charges, all credits and the daily financial result (profit or loss), for each Gaming Machine or table separately and for all the Gaming Machines or tables of the casino as a whole.
 - β. Issuing an analytical report of statistical and accounting data resulting from the measurements of the electronic counters for each day of operation, for each Gaming Machine and/or table separately and for all the Gaming Machines and/or tables of the casino as a whole. The same possibility shall be provided for each specific period of time.
 - c. Issue a detailed report of the actual rate of return for each Gaming Machine and/or table individually and for all Gaming Machines and/or tables in the casino as a whole. This facility must be provided for each day and for each specific period of operation.
 - δ. Issuing a detailed report comparing and verifying the actual performance rate with the theoretical performance rate (of the Electronic Game Certification), for each Gaming Machine separately and for all Gaming Machines.

of the casino as a whole. This facility must be provided for each day and for each specific period of operation.

- ε. Any other reference provided for in the TIPs or specified by the Authority.
 - The above references to table games in points (b) and (d) of the CPPG are mandatory where electronic payment systems or player cards are used in the participation.
- 38.2. The following may be specified by Directive of the SCTEE:
 - a. specific obligations and specifications of the Licensee with regard to their accounting system, their accounting records and books, the keeping and maintenance of any kind of data, data, records and registers, the type, type, form, content, manner and time of keeping and storing any kind of data and information,
 - b. obligations and requirements regarding financial statements that the Licensee must submit to the NRA, in addition to the obligations that the Licensee has under Law no. 4308/2014 (A' 251), as well as requirements and obligations to have part or all of its financial statements audited by an independent external a u d i t o r appointed by the FFAFP
 - c. the Licensee's obligations regarding the type, form, content, manner and time of submission to the EEPC of the statement of return and any other data, data or information for the collection of the Greek State's share of the Licensee's gross profits, as well as any other income or claim arising in favour of the Greek State and its entities from participation in the organisation and conduct of the games.
 - δ . Any other details necessary for the application of this Article.

Article 39 DATA BASE OF PLAYERS

- 39.1. The Playing Activity is recorded in the Player Database. The Licensee's staff is responsible for informing the persons in charge of monitoring the Gaming Activity about any unusual activity that comes to their attention that is related to money laundering. The database shall be updated with relevant records relating to such actions, which shall be kept for at least five (5) years.
- 39.2. A Directive of the EEPC defines the exact data, the form and scope of the Playing Activity to be kept in the Players' Database, per game played, as well as the way the Authority has access to these data.

Article 40 Control and supervision

- 40.1. The control and supervision of the Casinos is exercised by the NCA, in accordance with the provisions of the applicable provisions, the terms of the License, the contracts and the Gaming Regulation.
- 40.2. The Licensee, its staff of any kind, as well as those who cooperate with it, are required to grant access to the SCC and its delegated bodies, in the exercise of its supervisory and control functions, in the manner and at the time specified by the Authority.
- 40.3. The NCA conducts an investigation either on its own initiative or on complaint and imposes sanctions if it finds that there has been a breach of the terms of the Licence and contracts, the Gaming Regulations and the applicable provisions.

Article 41 TRANSITIONAL PROVISIONS

Article 42 ENTRY INTO EFFECT