Handled by Monica Alisøy Kjelsnes, 57 82 80 25 Our date 02.10.2014 Your date Page 1 of 4 Our reference 14/05930-2/576 Your reference

See attached list

The activities of foreign gaming companies in Norway

Information about the regulations

Norway has a monopoly on lotteries and games of chance, and Norsk Tipping is currently the only legal provider of online games of chance.

Foreign gaming companies that offer online gambling to gamblers in Norway do so in violation of Norwegian law. Nor it is legal to market such gambling games in Norway.

Several foreign gaming companies also publicly state that they are offering and marketing their games legally in Norway. That is not correct.

Through this letter, the Norwegian Gaming Authority wishes to inform foreign gaming companies about the Norwegian regulations that apply in this area. We also wish to urge the gaming companies to organise their activities in accordance with Norwegian law.

The regulations

It is prohibited in Norway to organise, market and mediate gambling games for which a permit has not been granted. Pursuant to Section 6 of the Lottery Act and Section 2 of the Gaming Act, it is illegal to offer gambling games without a permit. It also follows from Section 11 of the Lottery Act and Section 2 of the Gaming Act that the marketing and mediation of gambling games without a permit is illegal.

In principle, the ban on marketing applies to all activities that promote the sale of gambling games not covered by a permit. This includes utterances and other measures encouraging people to participate in such gambling. The prohibition on mediation includes the mediation of payment for gambling games not covered by a Norwegian permit.

The purpose of the Lottery Act and the Gaming Act is to ensure that gambling games offered in Norway are subject to control and that the gambling games that are offered are acceptable. The Gaming Authority also makes reference to Section 1a of the Lottery Act and Section 1 of the Gaming Act. These provisions state that the purpose of the acts is to ensure that lotteries and games of chance are organised in a satisfactory manner and under public control, with a view to preventing negative social consequences of gambling. At the same time, steps shall be taken to ensure that the profit from the games can be used as a source of income for humanitarian activities and work for the benefit of society.

The Norwegian authorities believe that it is important that gambling games are offered in a manner that is perceived as justifiable in relation to Norwegian traditions and from a Norwegian point of view. This applies to the content, execution and the overall scope of gambling games on offer.



Who is covered by the prohibition?

The prohibition set out in the Lottery Act and the Gaming Act on organizing, marketing and mediating lotteries and games of chance not covered by a permit clearly applies to Norwegian enterprises that engage in such activities or contribute to this in Norway.

The prohibition also applies to Norwegian and foreign enterprises that offer online gambling from abroad, if their activities target Norwegian gamblers.

The Gaming Authority regards activities as targeting Norway if one or more of the following conditions are met:

- The gambling website offers Norwegians to participate.
- The company behind the website is Norwegian or affiliated to Norway in some other manner.
- The company has a personal representative in Norway.
- The website is in Norwegian and offers customer support in Norwegian.
- The website is organised in a way that evades the prohibition against mediation of payment for gambling games not covered by a Norwegian permit.
- The website offers gambling in Norwegian currency.
- The website offers betting on Norwegian football matches or other Norwegian betting objects.
- The income or parts of the profits from the gambling go to Norwegian nationals, companies or organisations.
- The gaming company actively targets the Norwegian market in other ways, for example through marketing in various Norwegian media and through the use of Norwegian spokespersons and ambassadors.

How to organise the gambling games so that they are in accordance with Norwegian law

The Gaming Authority has not previously taken action against foreign gaming companies that run illegal operations in Norway, since we have limited means at our disposal. This does not mean that the games offered are legal.

Through this letter, we urge foreign gaming companies that offer online gambling and that wish to operate legally in Norway to change the gambling games they offer and the marketing of the games, so that they are not in violation of Norwegian law.

Foreign gaming companies may, at their own initiative, implement a number of measures to ensure that the games offered are in accordance with the Norwegian regulations. See the list of conditions above. One alternative is to exclude Norwegians from participating in gambling games not covered by a permit in Norway, which some of the foreign gaming companies have already done.

The use of Norwegian celebrities in marketing campaigns

The Gaming Authority also notes that several foreign gaming companies use Norwegian celebrities as spokespersons and ambassadors for their company in Norway. A lot of the activities carried out by these persons in Norway constitute illegal marketing and mediation of gambling games. The illegal activities include blog entries and statements in social media that encourage Norwegians to take part in gambling



games. Such activity also includes attending football matches and other events and engaging directly in advertising for foreign gaming companies.

The Gaming Authority will closely monitor developments in the use of Norwegian celebrities as spokespersons or ambassadors for foreign gaming companies. We will consider taking direct action against them if the illegal marketing and mediation of gambling games does not cease.

Concluding remarks

This letter is being sent to foreign gaming companies that offer online gambling games targeting Norwegian gamblers in violation of Norwegian law, and that have engaged most in marketing in Norway recently.

The letter will also be sent to Norwegian celebrities who work as spokespersons or ambassadors for these gaming companies.

The Gaming Authority will also publish the letter on its website, www.lottstift.no, together with a list of the gaming companies to which the letter has been sent.

Please confirm that this letter has been received and forwarded to the correct person in the gaming company.

Regards

Atle Hamar

Director general

Linda Vøllestad Westbye

Deputy Director General



The letter will be sent to the following foreign gaming companies:

- Unibet.com
- MrGreen.com
- Betsson.com
- Spilleautomater.com
- Euroslots.com
- Norgesautomaten.com
- Norgesspill.com
- Betsafe.com (eid av Betsson.com)
- Comeon.com
- 7red.com
- Norskelodd.com
- Maria.com
- Bingo.com
- Verajohn.com
- Nordicbet.com
- Pokerstars.com
- Pingocasino.com
- Casumo.com
- Norskespill.com
- Violetcasino.com
- Folkeautomaten.com
- SuperLenny.com
- Mobilbet.com
- Leovegas.com

The letter will be sent to the following Norwegian spokespersons and ambassadors:

- John Arne Riise (Betsson)
- Tone Damli Aaberge (Betsson)
- John Carew (Comeon)
- Thomas Myhre (Nordicbet)
- Linnie Meister (Nordicbet)
- Sandra Lyng Haugen (Folkeautomaten)
- Ronny Johnsen (Unibet)
- André Villa (Mobilbet)