

Guidelines for supplier licences



Description of licence requirements for suppliers

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Version history

Version 1.0 - July 2024

- Creation of guidance.

Version 1.01 – 15 November 2024

- Update specifying who needs a licence relating to betting. Companies who only supply odds feeds are among other things removed since this element in the betting provision is not certified.

Foreword

1

These guidelines are intended for companies, who want to obtain or who already have obtained a licence as a game supplier in Denmark according to the Gambling Act.

The guidelines give an overview of what game suppliers need to consider when applying for a licence as game supplier in Denmark.

It is a requirement that you must have a licence as a game supplier if you supply games to operators, who have a licence to offer betting or online casino in Denmark. Supply of games must be understood in a broad sense, meaning that it includes both suppliers of casino games, e.g. slot machines or roulette, and suppliers of services that execute and settle bets.

The Danish Gambling Authority has the responsibility for issuing licences for the provision of gambling in Denmark.

1.1 Definitions

In the guide, the terms "license holder" and "game supplier" are used. These two terms are defined as follows:

License holder

- Individuals or companies, etc. (legal persons) who has a licence to offer betting or online casino in according to the Danish gambling act.

Game supplier

- Company with a license to supply games to license holders to offer betting or online casinos according to the Danish Gambling Act.

Legal framework and practical information

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These guidelines describe the most important rules for companies that wish to be licensed as a game supplier in Denmark

The legal basis is the Danish Gambling act and the following executive orders:

- Executive order on online betting
- Executive order on land-based betting
- Executive order on online casino

In addition, the Danish Gambling Authority can attach conditions to a licence such as the regulation of games supplied.

You can find further information at www.spillemyndigheden.dk. Here you can also find forms and other documents for use for applications. Please feel free to contact the Danish Gambling Authority via our online contact form at www.spillemyndigheden.dk/en/kontakt. You can select a subject and the message is digitally encrypted. You can also contact us by phone on +45 72 38 79 13.

**What is the scope of the
guidance?**

3

3.1 Games that can be supplied with a game supplier licence

In this section the games that Danish licensed operators are allowed to offer. Only these games are allowed to supply as Danish licensed game supplier

3.1.1 Betting

Betting is an activity where the participant has a chance of receiving winnings, with bets placed on the result or outcome of a future event. This could, for example, include bets on the name of a new member of the royal family.

Provision of betting only requires a licence if the participants:

- Pay a stake (money or similar), and
- Have the chance of receiving winnings as a result of the stake (all types of winnings).

Betting can be divided into two categories:

- Fixed odds betting – where the player bets directly against the gambling provider and knows the potential winnings beforehand. This definition also includes betting exchanges, where players compete against each other.
- Pool betting – where all or part of the winnings are decided by the accumulated pool of stakes or is shared between the winners.

A licence for betting includes both online and land-based sales of betting. Online betting is defined as when the player and the operator are not physically in the same location, for example internet, telephone and TV sales.

It is not allowed to provide betting on events limited to children under the age of 18.

It is not allowed to offer betting on the result of lotteries or other randomly generated events. However land-based betting are allowed to include betting on the results of virtual sports events.

3.1.2 Online casinos

A licence to offer online casino in Denmark covers:

- Roulette, blackjack, baccarat, punto banco, poker, online bingo and slot machines.
- Combination games - all other games with a combination of skill and chance; see definition below.

3.1.3 Combination games

A combination game is defined as a game where the participant has a chance of receiving winnings, and where this chance depends on a combination of skill and chance. Combination games are decided by a combination of chance elements, such as using playing cards, rolls of a dice, draws, and the players' skill/intelligence. The share of chance or skill involved does not define whether the game is a combination game or not.

If an element of chance is added to a game, which is purely based on skill – for example a draw between the best players, then the game will be classified as a combination game because the opportunity for winning now depends on a combination of skill and chance. However, the combination of skill and chance must be a demonstrably natural part of the game.

Examples of combination games:

- Whist
- Hearts
- Yahtzee
- Ludo
- Rubber-bridge
- Backgammon

Who can apply?

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4.1 Who needs a licence?

Any company (legal entity) that supplies games described in section 3.1 to license holders with a licence to offer betting or online casino in Denmark must be licensed as a game supplier in Denmark.

The company subject to a license, is as a rule the one that has entered into an agreement with the license holder. There are however situations where a company is also required to have a supplier licence, even if the formal agreement with the licence holder has been entered into by another company. See section 4.2 on special situations.

Any legal entity must have a licence if you supply games to another legal entity. This applies regardless of whether the two entities are part of the same group. This means, for example, that a parent company must have a license to supply games to its subsidiary.

It is not a prerequisite to be able to apply for a license as a game supplier that the applicant company has already entered into an agreement to supply games to a Danish license holder.

Betting

Companies that handle execution and settlements of bets for Danish betting license holders must have a license as a game supplier.

The company subject to a licence requirement is the company which has entered into an agreement with a Danish betting licence holder on supplying services, where the company:

- Is responsible for managing the execution of bets
- Is responsible for settling the outcome of an incident in a bet
- Has their game platform certified, which presents, maintains, executes and settles bets

It is important that the company who supplies the game platform through which a licence holder provides betting, and whose game platform is certified in accordance with the Danish Gambling Authority's certification programme is licensed as a supplier.

In some instances, betting licence holders have developed their own game platform through which they provide betting. In this case, the licence holder does not need a supplier licence.

However, if a betting licence holder is part of a group and another independent entity in the group supplies the game platform, the independent entity will need a supplier licence.

Suppliers of bets on the outcome of electronically simulated sports events (Virtual bets) are also required to have a supplier licence.

Online casino

Companies that supply the permitted casino games mentioned in section 3.1.2 to Danish license holders must be licensed as a game supplier. A supplier licence is required regardless of whether the supplied game is "installed" on the license holder's gambling system or whether the player is actually sent on to the game supplier's game platform.

4.2 Special situations

The company subject to a licence is as a rule the company that enters into an agreement with Danish license holders. However, there are special situations that you must be aware of.

Companies that supply games through another company's distribution network (aggregator), and thus do not formally enter into an agreement with the Danish licence holders about the

supply of games, must as a rule have a supplier licence. It is decisive whether all or part of the technical and legal responsibility for the operation of the game has been transferred to the aggregator company. In cases where the company itself, and not the aggregator company, is responsible for e.g. certification of the game or the operation of the game, the company must have a licence.

Companies that, on the other hand, have transferred all responsibility for certification, operation of games and other regulatory compliance to an aggregator, do not need a licence.

An aggregator that functions exclusively as a distribution network between game suppliers and licence holders should, as a rule, not apply for a licence cf. the above. If an aggregator via the same distribution network supplies its own games or games that the aggregator has the legal responsibility to operate, the aggregator must apply for a supplier licence.

4.3 Who do not need a licence

A company (legal entity) that both develops its own games and simultaneously offers these games on the Danish market with a Danish license to offer betting or online casino must not also have a supplier licence. However, it is important to be aware that the company is obliged to register its games in the Danish Gambling Authority's games register cf. section 8.

The exception only applies to situations where the game developer and the game operator are the same legal entity. Furthermore, one must be aware that if a company simultaneously supplies in-house developed games to other companies – both within and outside its own group – it is required to have a supplier licence.

The following list contains examples of the provision of services, etc., which the Gambling Authority considers in isolation do not require an independent supplier licence.

- Base platform (The Danish Gambling Authority's definition of a base platform is primarily the system that handles gambling accounts. This falls under the licence holder's responsibility, even if all or parts of the base platform are provided by subcontractors).
- SAFE for data reporting.
- Payment providers.
- Know Your Customer-procedures.
- AML procedures.
- Responsible gambling tools.
- Sound/Music/Graphics for games.
- Exclusively statistical information for example for betting.
- Hardware used for land-based offering of betting for instance terminals, card readers, cash dispensers.

Application

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5.1 Forms

Applicants need to use form 2-06 to apply for a supplier licence. The form can be found at spillemyndigheden.dk/en, select game supplier.

The final pages of the form also contain detailed explanations on how to fill in each point.

The following individuals must fill out a personal declaration (Annex A - form 2-02):

- All the executive board members and board members in the applicant's company.
- An appointed representative in Denmark.
- Beneficial owner.
- Any other individuals that are requested by the Danish Gambling Authority to do so.

Information about technical conditions must be provided in Annex B-2 - form 2-08 as well as submitting information about games and RNG to the Danish Gambling Authority's games register.

In connection with the application, the Danish Gambling Authority may ask for further information and perhaps request a meeting to clarify questions.

All forms must be signed manually or with electronic signatures.

5.2 Application fee

A fee must be paid in combination with submitting a licence application. The fee must be paid in full, when the application is submitted to the Danish Gambling Authority. Proof of payment must be attached to the application.

The Danish Gambling Authority only processes the application in full or partly once the fee has been paid.

The payment must be done by bank transfer in DKK. The account number to which the fee must be paid is shown on the application form.

The fee is regulated on an annual basis and appears from spillemyndigheden.dk/en.

The fee will, in principle, not be returned – even in the cases where the application does not end with a licence being granted.

See spillemyndigheden.dk for more information about fees and the current rates.

5.3 Submitting the application

Applications must be submitted to the Danish Gambling Authority by using the secure file sharing system "Bluewhale".

The communication using Bluewhale is described in: "Guidance on using Bluewhale – how to receive and send messages using Bluewhale" and at the back of the application forms.

The application must be organised into folders, with each file having a logical title and number referring to the relevant item in the application form.

It is not possible to send a hard copy version of the application or using USB.

Requirements for applicants

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6.1 Requirements for companies

There are two objective and two subjective requirements that need to be fulfilled before a licence can be granted.

The objective requirements are:

- The applicant must not have filed a petition for restructuring, bankruptcy or debt relief or be subject to restructuring, bankruptcy, or debt relief proceedings
- The applicant must not have any debts outstanding to public authorities.
 - Outstanding debts are defined as debts which have passed the deadline for payment
 - and have been passed on to the national debt recovery authority at Danish Debt Collection Agency.
 - Debts will not affect your licence application if:
 1. The applicant has entered into a repayment agreement,
 2. Full security for the debt has been provided, or
 3. There is disagreement between the applicant and Danish Debt Collection Agency as to the existence of the debt or its size, and Danish Debt Collection Agency Danish Debt Collection Agency Danish Debt Collection Agency has informed the applicant that the debt will not be recovered until such disagreement has been s.

Subjective requirements are defined as situations where the Danish Gambling Authority makes an individual assessment of whether the applicant meets the requirements.

The subjective requirements are:

- The applicant must not have been convicted of a crime in Denmark or abroad that implies a risk that the applicant will misuse the access to working with gambling.
- The applicant must be able to provide gambling in an appropriate, professional way.

Requirement	What does the requirement mean?
The applicant must not have been convicted of a crime in Denmark or abroad that implies a risk that the applicant will misuse the access to working in the area of gambling.	The Danish Gambling Authority must assess, whether contravention of legislation involves a significant probability that the applicant will misuse the access to working with gambling activities. All infractions may be relevant, but the Danish Gambling Authority will always consider the type of crime you have committed, when it happened in relation to the time of application, and if it involved repetition or systematic contravention. Contraventions of tax and excise duty legislation may also be of importance in any assessment. Fines and similar are also considered as infractions.
The applicant must meet the requirements for appropriate professional operations.	In the assessment the Danish Gambling Authority considers such factors as the applicant's organisational conditions, including internal rules and procedures. The assessment will also look into the group, which the applicant is a part of, including other gambling related licences in the group. Finally, the Gambling Authority considers the reputation of the applicant and its group in the gambling industry.

6.2 Requirements for members of the board of directors and the board as well as the ultimate beneficial owners

Members of the board of directors and the board as well as the ultimate beneficial owners must meet the same requirements as the applicant company cf. section 6.1. In addition, the individual must be at least 21 years old and must not be under guardianship or requested guardianship.

6.3 Game suppliers established outside the EU or EEA

If the game supplier is established outside the EU or EEA, it is a requirement that the game supplier has a representative in Denmark. The representative may be either an individual or a company and must be approved by the Danish Gambling Authority.

At www.skat.dk you can find an overview of EU and EEA countries.

The representative must be able to represent the game supplier in areas of administrative law and in procedural and criminal law, as the representative will be responsible for the day-to-day communication with the Danish Gambling Authority.

As a rule, the representative is not financially liable for the game supplier, unless this is included in the applicant's company law structure with, for example, a declaration of support or as a financially supporting company vis-à-vis the applicant.

The representative may well be a subsidiary or sister company of the game supplier. The company must be established in Denmark in order to meet the requirements as a representative.

If the representative is a company, the representative must meet the same requirements as the game supplier; see requirements for companies in section 6.1. The representative must also be resident in Denmark. If the representative is an individual, the same requirements as for management members and beneficial owners apply in addition, see the requirements for this in section 6.2.

Requirements for appropriate professional operation

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To obtain a supplier licence the applicant must demonstrate that the operation of the company will happen in an appropriate professional way. The concept is described below.

7.1 Appropriate professional operation

The Danish Gambling Authority's evaluation of applicants includes the requirements set out below, relevant Acts and Executive Orders, and the information you submit with the application.

7.1.1 Annex A

A personal declaration, annex A, must be filled out by the following individuals:

- All board members and executive board members of the applicant's company,
- The representative of the applicant in Denmark,
- Beneficial owners,
- Anybody that the Danish Gambling Authority requests to do so.

7.1.1.1 Beneficial owners

Applicant companies must identify the business's beneficial owners. Publicly available registers in many jurisdictions will include information about the beneficial owners.

The term "beneficial owners" is defined in the Anti-Money Laundering Act, which is administered by the Danish Financial Supervisory Authority. The Danish Gambling Authority rely on this definition and thus refer to the Danish Financial Supervisory Authority's AML guide for additional guidance and interpretation of the term "beneficial owners". Furthermore, we refer to the Danish Business Authority's guide on registration of beneficial owners for further interpretation.

The beneficial owners of an applicant company are the natural person(s), who own or control the applicant company.

When the applicant company shall identify its beneficial owners, the company must assess which persons, who have a sufficient share of the equity interests or the control. An indicator of what constitutes a sufficient share would be, in principle, that the person has more than 25 percent of the equity interests and/or the control (indirect ownership). However, it is important to stress that the percentage limit is only an indicator of real ownership or control.

Criminal record and declaration of debts must be submitted along with Annex A.

Criminal records and declarations of debt from the relevant authorities in the current country of residence must, as a rule, not be more than 6 months old at the time of application. For previous countries of residence, it is sufficient with a certificate of any time during the stay.

7.1.2 Annex B-2

Along with the application form for applying for a supplier licence, the applicant must submit a filled in and signed Annex B-2.

7.1.2.1 Responsible person for game software and operation of games

The game supplier must as a minimum have the following organisational role:

- A person responsible for game software and operation of games, including all games are build and run correctly and reliable without errors. The game supplier must inform the Danish Gambling Authority, who fills in this area of responsibility.

The responsible person must possess necessary qualifications and experience in order to take on the role and responsibility. The game supplier must make sure, that the person has the authority to take measures and complete necessary changes in order to make sure the game supplier complies with the requirements in place.

As a rule, the responsible person must be employed by the applicant company, but the Danish Gambling Authority accepts persons, who are e.g., employed in the same group if the person has the authority to take measures and complete necessary changes. The person must provide and account for any information and documentation, which the Danish Gambling Authority requests.

The person cannot be employed by a sub contractor or in a company, which is not part of the same group as the applicant company.

The name of the person responsible for game software and operation of games must be noted under item 1 in Annex B-2. This person will be the Danish Gambling Authority's contact regarding technical conditions during the application process and after a licence is granted. The game supplier must inform the Danish Gambling Authority if a new person takes over the role and responsibility.

7.1.2.2 The game supplier's internal controls and duty to report

Internal controls

The game supplier must compose, document and complete ongoing controls to make sure the game supplier constantly complies with the requirements in place.

The purpose of the internal controls is to make sure that errors and irregularities with the execution of games are discovered and handled. The internal controls can be both manual processes and automated monitoring or the like and are expected to be planned and scaled to the game supplier's organisation and the extent of the game supply.

As a minimum the controls must cover:

- External audit when this is required to achieve a satisfactory level of documentation to comply with requirements in place.
- Instant reporting to the Danish Gambling Authority when errors or violations are found or when suspecting errors. The reporting must include the game supplier's assessment of the consequences by the error or violation.

There are no formal requirements for the game supplier's internal controls, the descriptions must however be specific and as a minimum include information about:

- which controls are established, and what they cover,
- the frequency each control is completed,
- who is responsible for each control (this does not need to be a named person)
- how errors and irregularities are handled, and
- in which situations the game suppliers use external audit (e.g. test and inspection by an accredited test company).

The description of the game supplier's internal controls must be submitted as an appendix to Annex B-2 when applying for a supplier licence.

Duty to report

If there is a suspicion about an error or when an error is found in e.g. a game the game supplier must inform the Danish Gambling Authority as soon as possible. Information must be sent to supplier@spillemyndigheden.dk with a description of the error and information about what precautions are taken in order to correct the error.

If an error is found in a game, then the game must be withdrawn from the market as soon as possible. This also means that the game must be deactivated in the games register. Licence holders who offer the games must also be informed by the game supplier, so they can deactivate the game in the games register. See further information in section 8 about the games register.

7.1.2.3 The game supplier's description and illustration of the game platform

The game supplier must produce a description and illustration of their game platform, which must be submitted as an appendix to Annex B-2 when applying for a supplier licence. The Danish Gambling Authority may also, as part of the supervision, request to have the description sent after a licence is issued, so the game supplier is expected to maintain the description.

The description and illustration of the game platform must contain information about the platform's infrastructure, and how the game platform is integrated with the licence holder's platform. If the game supplier uses sub contractors, then the description must also contain information about this.

If the game supplier operates as an aggregator it must appear from the description, which game developers and other game suppliers supply games to licence holders through this service. It must appear from the description, what responsibility the game supplier, as an aggregator, possibly has for the game developer's and other game supplier's technical solution including information about who is responsible for certifications.

7.1.3 Requirements for your game platform

"Game platform" is defined in the general requirements (SCP.00) in the Danish Gambling Authority's certification for betting and online casino. The definition of a game platform is:

- Games and system or other equipment used by a game supplier or licence holder for offering, executing, and operating games including equipment that:
 - Produce and/or presents games to the player, or
 - Determine and stores the result of a game or calculate whether the player has won or lost a game.

7.1.3.1 Certification of the game platform etc.

It is a requirement that the game supplier's game platform, business processes and business system are certified by an accredited testing organisation before games can be supplied to licence holders.

The Danish Gambling Authority's certification programme for betting and online casino is available on the Danish Gambling Authority's website.

The certification programme for betting and online casino contains the following documents:

SCP	Name of document	Shall have completed	Responsible for content and reporting
00	General requirements	-	-
01	Requirements for RNG	Game supplier and licence holders with own games	Game supplier and licence holders with own games
02	Requirements for base platform	Licence holder	Licence holder
03	Information security management system	Game supplier and licence holder	Game supplier and licence holder
04	Requirement for penetration testing	Game supplier and licence holder	Game supplier and licence holder

05	Requirements for vulnerability scanning	Game supplier and licence holder	Game supplier and licence holder
06	Change management programme	Game supplier and licence holder	Game supplier and licence holder
07	Requirements for games	Game supplier and licence holders with own games	Game supplier and licence holders with own games

Notice that document SCP.02 only applies to licence holders, who offer betting and/or online casino. Game suppliers shall therefore not be certified in accordance with this document.

There are 3 versions of document SCP.07:

- 01 Requirements for games – Online betting
- 02 Requirements for games – Land based betting
- 03 Requirements for games – Online Casino

Game suppliers are responsible for having their games tested and inspected in accordance with the version of SCP.07 applicable for the game in question.

The accredited testing organisations shall test and inspect on the basis of the requirements, which appears from the abovementioned documents. The results of tests and inspections shall be documented by using standard reports, which can be found on the Danish Gambling Authority's website.

Certification frequencies

Game suppliers are responsible for making sure, that certification is done with the following frequency:

SCP	Name of document	Frequency
00	General requirements	-
01	Requirements for RNG	Interval of maximum 12 months
02	Requirements for base platform	-
03	Information security management system	Interval of maximum 12 months
04	Requirement for penetration testing	Interval of maximum 12 months
05	Requirements for vulnerability scanning	Interval of maximum 3 months
06	Change management programme	Interval of maximum 12 months
07	Requirements for games	Interval of maximum 12 months

Renewed certification of SCP.01 and SCP.07

If it can be documented that there have been no changes to RNG or games in the previous 12 months, then the testing organisation can sign the standard report without completing any further tests or inspections. The documentation for no changes can for instance be comparison of hash-values generated by the testing organisation or by using validation software.

If there have been changes to RNG or games in the previous 12 months, then the renewed certification of SCP.01 and SCP.07 can be based on sample checks and compliance with the requirements in document "SCP.06 – Change management programme".

Deadlines and reporting method

Game suppliers are responsible for submitting documentation for completed certifications within the following deadlines and by using the mentioned reporting method. The deadline is calculated from the date the certification was completed:

SCP	Name of document	Deadline	Reporting method
00	General requirements	-	-
01	Requirements for RNG	1 month	Games register
02	Requirements for base platform	-	-

03	Information security management system	1 month	Contact form
04	Requirement for penetration testing	1 month	Contact form
05	Requirements for vulnerability scanning	1 month	Contact form
06	Change management programme	1 month	Contact form
07	Requirements for games	1 month	Games register

Use of accredited testing organisations

The requirements for the accredited testing organisations and their personnel appears from each document. The requirements for instance entail an ISO 17020, ISO 17025 and/or an ISO 17065 accreditation depending on, which of the documents are in question.

The ISO accreditation shall be done by DANAK (the Danish Accreditation Fund) or a similar accreditation body, who is co-signer of EA's (European co-operation for Accreditation) multi-lateral agreement on reciprocal recognition regarding testing and inspection, or for labs outside EA's jurisdiction, by an accreditation body, who is co-signer of ILAC's (the International Laboratory Accreditation Cooperation) multilateral agreement on reciprocal recognition regarding testing and inspection.

In order to conduct penetration testing in accordance with SCP.04 the testing organisation can, instead of being ISO accredited, have a CREST accreditation for penetration testing or be approved as an Approved Scanning Vendor (ASV). CREST accreditation is done by CREST. ASV approval is done by Payment Card Industry (PCI) Security Standards Council (SSC).

In order to conduct vulnerability scanning in accordance with SCP.05 the testing organisation can, instead of being ISO accredited, have a CREST accreditation for vulnerability assessment or be approved as an Approved Scanning Vendor (ASV). CREST accreditation is done by CREST. ASV approval is done by Payment Card Industry (PCI) Security Standards Council (SSC).

A testing organisation who has been accredited or approved can conduct testing, inspections and scanings of the game platform etc., without any further approval by the Danish Gambling Authority.

The Danish Gambling Authority does not maintain a list of testing organisations. It is the game supplier's responsibility to use a testing organisation, who has obtained the proper accreditation/approval. Documentation showing that a testing organisation has the proper accreditation or approval is submitting along with the standard report. This can either be done by providing a link to the accreditation/approval, if this is available online, or by submitting it as an appendix to the standard report.

7.1.3.2 Physical location of the game platform

There are no geographical requirements to the location of the the game supplier's game platform. The game supplier must note the location of the game platform in Annex B-2 when applying for a supplier licence.

On-premises or private cloud

If the game platform is placed in an on-premises environment or in a private cloud environment operated by the game supplier, the physical location (address) of the game platform is noted under item 2 in Annex B-2.

Public cloud

If the game platform is placed in a public cloud environment and thereby placed at a third party, the information about the third party (Name, address etc.) is noted in an appendix submitted along with Annex B-2. In this situation the Danish Gambling Authority accepts, that it is not possible to provide information about the physical location of the cloud environment.

7.1.4 Information about the applicant company and group

The following information about the applicant company and group must be submitted as appendixes to the application form.

7.1.4.1 Deed of foundation or certificate of registration for applicant

The applicant must send a confirmed copy of the applicant company's certificate of registration from the registration authority in the applicant company's home country.

7.1.4.2 Applicant company's latest articles of association

The applicant must send the most recent articles of association for the applicant company, and these must be signed by the board of directors.

7.1.4.3 Organisation chart of the group

The applicant must send an organisation chart of the group providing a complete overview of the group of which the applicant is a part. All parent companies, subsidiary companies, and sister companies of the applicant must therefore appear from the organisation chart.

The applicant company must be clearly highlighted in the organisation chart. The organisation chart of the group must include all relations up to the natural persons owning at least 10 percent of the voting rights or capital of the group.

In addition, it must be stated if the applicant company, the subsidiary company, or the sister company have owners who are not directly a part of the group and who have ownership interests of at least 10 percent.

It must be stated in the organisation chart of the group how large ownership interests each company and person has.

The organisation chart of the group must include names and company registration number of all companies/units part of the group. If a company/unit does not have a company registration number, a corresponding registration number from the home country must appear along with a statement of the home country.

If a listed company is part of the group, the company's group of owners does not need to appear from the organisation chart of the group, however, it must be highlighted that the company is listed.

If a commercial foundation or another autonomous legal arrangement owns the group, the chart must show all owner relations up to here.

7.1.4.4 Chart of the company's organisational structure

The applicant must submit an organisation chart including a hierarchical structure of the individual divisions and subdivisions at the applicant company. The chart must also state which persons are responsible for the functions performed by the divisions, for example compliance, technical matters, or customer relations etc. If the functions are performed in other parts of the group, this must be stated. Functions performed in other parts of the group can either be stated in the organisation chart or in an independent document.

7.1.4.5 Overview of the group's gambling related licences in other jurisdictions

The applicant must submit an overview of gambling related licences, which the applicant company or other companies in the group may have. The overview must show what the licence covers and in which jurisdiction and by which authority the licence was issued.

7.1.4.6 Overview of any revoked licences related to gambling

The applicant must submit an overview of any gambling related licences, which the applicant company or other companies in the group may have had revoked. For the applicant company a copy of the letter of revocation must be attached the application.

7.1.4.7 Overview of any rejected licence applications related to gambling

If the applicant company or other companies in the group have received a rejection of a licence application related to gambling in Denmark or other jurisdictions, the reason for this must be stated. For the applicant company, the rejection letters must be attached the application.

Games register

8

It is a requirement that game suppliers submit information about their games and RNG to the Danish Gambling Authority's games register.

A user guidance can be found in the games register.

Licence holders who offer their own games, have the same obligations as a game supplier to keep the games register up to date. Licence holders must also report to the games register, which games they offer from which game suppliers. Please see the Guidelines for operators of betting and online casino, which can be found on the Danish Gambling Authority's website.

8.1 Credentials for the games register

The Danish Gambling Authority issues credentials to game suppliers as part of the process for applying for a supplier licence. Credentials are only issued to game suppliers, who has applied for a licence.

The Danish Gambling Authority also issues credentials to the games register to licence holders who offer betting and/or online casino for the Danish market.

8.2 Game certificates and information about games

As documentation for completed test and inspection of games the game supplier must upload game certificates to the games register for the games, which they want to supply to licence holders.

Game suppliers must use the Danish Gambling Authority's standard reports referring to the certification programme's document SCP.07 for respectively online betting, land based betting and online casino. The standard report constitutes a game certificate and may cover one or more games.

The following applies if a certificate covers more than one game:

- All games covered by the game certificate must have the same test- and inspection date. This is important, because the date from the certificate is used when uploading to the games register.
- The game certificate must be a compilation of tests and inspections of all games covered by the certificate.
- From the appendix to the standard report it must clearly appear, which games are covered by the game certificate. In the appendix the name of the game, version and game category must be stated. Certificate and appendix must be joined in one pdf file before upload to the games register.
- Game certificates, which covers more than one game must only be uploaded once to the games register, however it must be connected to each game it covers in the games register.

Along with uploading game certificates the game supplier must also submit the following information about each game:

- Name of the game.
- Version.
- Game category.
- Name of game developer (if this is not the game supplier e.g. in a situation, where the game supplier operates as an aggregator).
- Information about RTP (Return To Player) or commission.
- Expiration date of the game certificate.
- ID of game certificate.
- Name of the accredited testing organisation.

8.3 RNG certificates and information about RNG

As documentation for completed test of the game supplier's RNG(s) the game supplier must upload certificates, for those RNG(s) the game supplier uses.

Game suppliers must use the Danish Gambling Authority's standard report referring to the certification programme's document SCP.01. The standard report constitutes a RNG certificate and may cover one or more RNGs.

The following applies if a certificate covers more than one RNG:

- All RNG covered by the certificate must have the same test date. This is important, because the date from the certificate is used when uploading to the games register.
- The certificate must be a compilation of test of all RNGs covered by the certificate.
- From the appendix to the standard report it must clearly appear, which RNGs are covered by the certificate. In the appendix information is stated to identify each RNG.
- Certificate and appendix must be joined in one pdf file before upload to the games register.
- Certificates, which covers more than one RNG must only be uploaded once to the games register, however it must be connected to each RNG, which the certificate covers.

Along with uploading RNG certificates the game supplier must also submit the following information about each RNG:

- Identification of the RNG.
- Expiration date of the RNG certificate.
- ID of the certificate.
- Name of the accredited testing organisation.

8.4 The game suppliers update of the games register in connection with applying for a supplier licence

As a rule, upload of certificates and submitting information about each game and RNG must be done for the first time as part of the process for applying for a supplier licence. It is thus a mandatory part of the application process that game suppliers update the games register with information about their games and RNG, and a licence can, as a rule, not be issued before the information has been registered correctly.

An exception to the main rule is, if a game supplier, at the time of application or during the application process, does not have any games ready to supply to the Danish market for instance because certification has not been completed yet. In this situation the game supplier cannot submit any information to the games register as part of the application. Provided that a licence is issued, the game supplier must submit information to the games register, when their games are ready to be supplied to the Danish market. Submission of information to the games register must be done before the games are supplied to licence holders and offered to the Danish market.

8.5 The game suppliers update of the games register after licence is issued

It is the game supplier's responsibility to make sure, that information about each game and RNG in the games register is always up to date. This means amongst other things that a new

game certificate must be uploaded, when renewed certification of the game has been completed.

See further information on certification in section 7.1.3.1 and see the certification programme on the Danish Gambling Authority's website.

When the game supplier has submitted information about their games and connected them to uploaded game certificates, the game supplier is responsible for sending information to the licence holders, who offer the game supplier's games, so the licence holder can update the games register with the games they offer. When games are registered in the games register a unique ID is generated for each game. It is this unique ID the game supplier must forward to licence holders, who offer the game suppliers games.

The games register does not handle the process, where the game supplier sends unique IDs to the licence holders, who offer the game supplier' game. This process is agreed directly between the game supplier and the licence holder.

If a game supplier withdraws a game from the Danish market for instance because the game is permanently discontinued, or if an error is found in the game, the game supplier must perform an action in the games register in order to show the Danish Gambling Authority, that the game has been de-activated. At the same time the game supplier must inform any licence holder, who offers the game in question, so the licence holder can also update their offer in the games register.

According to the Danish Gambling Authority's certification programme for betting and online casino it is a requirement that renewed certification of RNG and games is completed with an interval of maximum 12 months. This means that every 12 months at the latest new certificates must be uploaded to the games register and connected to the games/RNG, which the certificates cover. The game supplier has 1 month to upload a new certificate, after a certificate has expired.

As mentioned in section 8.1 and 8.2 each certificate can, under certain circumstances, cover one or more RNG/games. If a certificate covers for instance 100 games, it is only necessary to upload the game certificate one time, however it has to be connected to each of the 100 games, which the game certificate covers.

8.6 Individual- or bulk upload of games and RNG

A game supplier has the option to submit information about games and RNG individually or by bulk using a csv template, which is available in the games register.

Issuance of licences

9

9.1 Licence period

A supplier licence is granted for a period of up to five years.

9.2 Geographical scope of the licence

A supplier licence can only be used to supply games to operators licensed to offer betting and online casino in Denmark.

9.3 Terms of the licence

Normally the licence will contain a number of specific terms and conditions, so the game suppliers must always pay special attention to the terms stated in the licence. An example of a term could be requirements for the design of games.

Violation of the terms of the licence may result in withdrawal of the licence.

9.4 Publication of game supplier list

The Danish Gambling Authority publishes and maintain a list of game suppliers with a Danish supplier licence. The list is available on the Gambling Authority's website.

9.5 Renewal of licences

Before a licence expires, it is possible to apply for a new one.

Changes to a licence

10

You may need to make changes to the basis on which your licence was issued. This could be in connection with restructuring of your company following a merger, a change of beneficial owners or changes to the ownership structure etc.

10.1 Transfer of a licence

As a rule, a licence cannot be transferred. However, based on a specific assessment this can be deviated from in situations where the licence is transferred between two companies in the same group and if both companies are entirely owned by the same owner.

10.2 Changes

10.2.1 Board members, executive board members and beneficial owners

The Danish Gambling Authority must be notified within fourteen days if a new member joins the board, a new executive officer is employed in the board of directors of the licenced company, or a new beneficial owner is identified.

The Danish Gambling Authority may make a decision that members of the board or members of the board of directors must resign from their post if they have been convicted of a criminal offence that involves a risk that they will misuse their access to working with gambling activities. The same applies if the member has unpaid, outstanding debt to public authorities exceeding DKK 100,000.

If a member of the board or a member of the board of directors is placed under guardianship in accordance with section 5 of the Guardianship Act (personal and financial guardianship) or section 7 (requested guardianship), the member must resign from their post. This also applies if the member has petitioned for a reorganisation, bankruptcy proceedings or debt relief, or is in the course of reorganisation, bankruptcy, or debt relief proceedings.

10.2.2 Changes in named employees responsible for specific areas

Changes to the named employee responsible for gambling software and the operation of games must be reported to the Danish Gambling Authority with the name of the employee responsible for the task in the future.

10.2.3 Changes to the ownership structure

The Danish Gambling Authority must be notified if the ownership structure is changed. In this connection, it is assessed whether the new owner is able to operate in an appropriate, professional manner, referring to section 32c in the Gambling Act.

For the preliminary assessment, the following must be sent:

- Timetable for the procedure.
- Description of the future changes to the organisational level.
- Organisation chart of the group before and after the changes.
- New Annex A if there has been changes in this group of persons (see form 2-02 for a description of this group of persons).

In addition to the above, it is assessed whether additional information is required.

Withdrawal of licence

11

The Danish Gambling Authority may withdraw the licence if the game supplier or its representative:

- Is in gross or repeated violation of the Gambling Act, its associated Executive Orders, or the terms of the licence.
- Has been convicted of a criminal offence that may involve a risk that access to working with gambling activities will be misused.
- Can no longer show that it is likely that the gambling activities will be operated in an appropriate financial and professional manner.
- Has failed to pay outstanding fees as set out in section 42 of the Gambling Act.
- Has unpaid, outstanding debt to public authorities in excess of DKK 100.000.
- Does not comply with the DGA's decisions on injunction within the stipulated time limit.

**Appeals on decisions
made by the Danish
Gambling Authority**

12

The licence holder can file an appeal about decisions made by the Danish Gambling Authority with the Tax Appeals Agency or the courts. The Tax Appeals Agency is the secretariat for the National Tax Tribunal.

12.1 Appeals about decisions made by the Danish Gambling Authority

As a game supplier you can appeal decisions made by the Danish Gambling Authority.

12.2 Requirements for the appeal

In order to handle the appeal, the following requirements must be met:

- The appeal must be in writing.
- The reasons for the appeal must be stated.
- All the points where the game supplier disagrees with the decision must be specified.
- The game supplier must attach a copy of the decision in question.
- Copies of all relevant documents supporting the case must be attached.

If these requirements have not been met, the game supplier will be contacted and asked to correct the omissions within a specific deadline.

If the requirements are still not met after the expiry of the deadline, your appeal may be rejected.

The appeal must reach the National Tax Tribunal no later than three months after the game supplier has received the decision from the Danish Gambling Authority.

12.3 Appeals to the Tax Appeals Agency (Skatteankestyrelsen)

Appeals can be filed online via the Tax Appeals Agency's appeals portal.

12.4 What does the appeal cost?

On filing an appeal, the game supplier must pay an appeal fee of DKK 1200.

The appeal must be sent electronically via the appeal form on skatteankestyrelsen.dk. When appealing you must pay the appeal fee with card or MobilePay.

There is no charge for decisions concerning freedom of information.

12.5 When the appeal decision has been made

Decisions of the Tax Appeals Agency are final and cannot be appealed to other bodies within the administrative system.

The matter may still be brought before the courts of law.

12.6 Appeals to court

Any appeal must be received by the court three months at the latest after the decision, which you want to appeal, has been made. The three-month time limit is reckoned from the day the decision is issued and not from the day the decision is received.

If the case is not brought before the courts before the three-month time limit, the decision will be final, and it will not be possible for the court to handle an appeal. In exceptional circumstances, a court may however decide to handle the case even though the three-month limit has passed.

It is possible to appeal decisions made by the Danish Gambling Authority directly to the courts. It is not a requirement that an appeal must first be filed to the Tax Appeals Agency.

It is also possible to appeal decisions made by the Tax Appeals Agency (Skatteankestyrelsen).

12.7 Suspensive effects of the appeal

When filing an appeal on a decision made by the Danish Gambling Authority to the National Tax Tribunal or bringing the case before the courts, the licence holder must be aware that the appeal does not always have a suspensive effect.

If the complaint does have a suspensive effect, the game supplier does not have to comply with the decision until the appeal case has been decided by the National Tax Tribunal or the courts.

If the appeal does not have a suspensive effect, the game supplier has to comply with the decision even though there is disagreement, and an appeal has been filed about the decision.

Filing an appeal with the National Tax Tribunal or bringing a case before the courts has suspensive effect if the decision concerns:

Decision	Reason for the decision
Withdrawal of a licence	The game supplier or the representative: <ul style="list-style-type: none"> • Is guilty of gross or repeated violation of the Gambling Act, of provisions set down in the Act, or of the terms of the licence, • Has been convicted of a criminal offence that leads to the potential risk that access to working with gambling activities may be abused, or • No longer fulfils the conditions about being able to operate gambling activities in an appropriate and professional manner.
Withdrawal of the approval of a representative	<ul style="list-style-type: none"> • The representative has been convicted of a criminal offence that leads to the potential risk that access to working with gambling activities may be misused • The representative is no longer established or resident in Denmark
Decision about members of the board or executive board being required to resign	The member has been convicted of a criminal offence that leads to the potential risk that access to working with gambling activities may be abused
The National Tax Tribunal or the courts may decide not to allow the appeal to have a suspensive effect on the decisions referred to above	

In other situations, an appeal does not have suspensive effect. In some situations, the National Tax Tribunal or the courts may however allow the appeal to have a suspensive effect under special circumstances.

