

GAMBLING REFORM IN FINLAND

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1) New Gambling Legislation

- ▶ MARKET TO OPEN ON JULY 1, 2027 ➡ 9 MONTHS TO GO!
- ▶ B2B LICENSE REQUIREMENT ON JULY 1, 2028
- ▶ EVALUATION OF THE NEW REGIME LATEST IN 2029 -



2) Application Process

- ▶ TIME FOR APPLICATIONS IS NOW
 - 77 applications, >40 operators and >100 brands so far ... and still more to go
 - Instructed to take 6 months ... or more
 - Now is the latest moment ... if you want to be ready in July
- ▶ FGA – WORKING HARD BUT NO REAL VISIBILITY
 - First licenses soon
- ▶ APPLICATION PROCESS – EXPERIENCES SO FAR
 - Reliability and suitability issues VS. different jurisdictions
 - Financial capabilities VS. newly established companies
 - Single license VS. several licenses
 - Policies and documents
 - Translations
 - Supplier listings
 - Organizational issues



2) Application Process



DOCUMENTS & POLICIES REQUIRED

- DD material
- Preliminary business and marketing plan
- Complaints handling policy
- Policy for preventing match-fixing (for betting operators)
- AML policy, risk assessment, KYC vs. NPB's new guidelines
- Financing of operations



3) Before the Operations Start (1)

- ▶ TECHNICAL INTEGRATION WITH THE FGA SYSTEMS
- ▶ SYSTEMS AUDITS
- ▶ TECHNICAL IMPLEMENTATION OF REQUIRED FEATURES



3) Before the Operations Start (2)

- ▶ RULES
- ▶ TERMS & CONDITIONS
- ▶ OTHER POLICIES
 - Responsible Gambling and Duty of Care Policies
 - Self-monitoring Plan
 - Marketing Policy (GA 35 §)
 - GDPR Documentation
 - Code of Conduct (competition, transparency, procurement etc.)
 - Accessibility
 - Whistleblowing
 - Amendments to license application information



3) Before the Operations Start (3)

- ▶ FINNISH OPERATIONS AND POSSIBLE ENTITIES IN FINLAND
 - Registrations of the company in Finland (Company Registry & Taxes)

- ▶ OPERATIONAL PARTNERSHIPS
 - Technology
 - Payments, FTN
 - Media & marketing
 - Sponsorships
 - Game providers
 - etc.



4) After the Start of the Operations

- ▶ MANDATORY REPORTING
- ▶ SUPERVISORY FEE
- ▶ GAMBLING TAXES
- ▶ COMPLIANCE, RE-AUDITS, REVIEWS etc.
- ▶ (BLACK) MARKET FOLLOW UP



5) HOT TOPICS

- ▶ **MARKETING**
 - Affiliates
 - Bonus
 - TV & radio vs. VOD & podcasts
 - Opportunities for all?
- ▶ **RESPONSIBLE GAMBLING**
 - Ministry Decree has been under consultation
 - Max. stakes, jackpots, pace, NO autoplay, playtime reminders etc.
 - Recommendation by working group of Ministry of Health
- ▶ **TECHNICAL REQUIREMENTS**
- ▶ **FAIR COMPETITION**
- ▶ **(BLACK) MARKET FOLLOW UP**



Thank You!



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Gambling reform in Finland from the business perspective

SPER conference, Mariehamn, 7.10.2026

Jari Vähänen

THE FINNISH
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Marketing rules

- Marketing may only be carried out by the gambling company itself.
- Gambling may be marketed on the gambling company's website and social media accounts, but the marketing may not be interactive with customers.
- Affiliate marketing is prohibited.
- Radio, TV, newspaper (magazine), and outdoor advertising are permitted.
- Sponsorship is allowed.
- The National Police Board is preparing more detailed marketing guidelines, expected to be completed in 2026.



Payments and bonuses

- Using a credit card for gambling is not possible.
- The use of cryptocurrencies for gambling is not allowed.
- No payment blocking.
- No welcome bonuses.
- Bonuses can be given to existing customers, but bonuses may not be based on the time spent gambling or the amount of money. All customers must have an equal opportunity to receive bonuses or other goods.



The role of Veikkaus

- A company with an exclusive license cannot obtain a gambling license.
- Veikkaus will be divided into two or more companies. One company will apply for a Gambling license, and the other company will apply for an Exclusive license.
- There is a risk of anti-competitive activities, which can be prevented through strict reporting obligations.
- Veikkaus's gambling license company can utilise the customer base (1-1.5 M) gained through its monopoly position and retain those customers who have played games that will move to the gambling license system.
- About 2.7 million Finns have registered as Veikkaus customers, so people are used to using Veikkaus' services.



Regulator and black market

- Finnish customers will continue to be able to play with gambling companies operating without a Finnish license, but those companies are not allowed to market in Finland.
- From a channelisation perspective, it is critical how well the regulator can prevent black market activity.
- The new system does not use payment or IP blocking.
- Only two potentially effective tools
 - B2B license - it is not yet known what requirements will be imposed on the licensee
 - Tax threat: tax must be paid on all individual winnings (per session) from unlicensed companies. The long-term result is irrelevant.





Thank you!
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