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## Applying for licences under the Gaming Act

### Contents

1	Legislative background, scope of application and definitions .....	3
1.1	Authority of the supervisory authority to issue orders .....	3
1.2	Legislation .....	3
1.3	Scope .....	3
1.4	Definitions.....	4
2	Form requirements for licence applications .....	4
2.1	Method of submitting applications .....	4
2.2	Language of administration .....	4
2.3	Public access to documents .....	5
2.4	Fees charged for processing applications.....	5
3	Report on the persons responsible for the licence application and significant owners .....	5
3.1	Persons in charge and significant owners to be specified in licence applications .....	5
3.2	Information to be provided on the applicant's responsible persons and significant owners .....	6
3.3	Reports to be submitted on the applicant's responsible persons and significant owners .....	6
4	Applying for an exclusive licence .....	8
4.1	Conditions for granting an exclusive licence.....	8
4.2	Information to be provided in the application.....	8
4.3	Appendices to the application .....	12
5	Applying for a gambling licence .....	13
5.1	Conditions for granting a gambling licence .....	13
5.2	Information to be provided in the application.....	14

5.3 Appendices to the application for all applicants for a gambling licence .....	19
5.4 Appendices to the application for applicants for a gambling licence registered abroad .....	21
5.5 Representative of an applicant established outside the European Economic Area .....	22
6 Applying for a gaming software licence .....	24
6.1 Conditions for granting a gaming software licence .....	24
6.2 Information to be provided in the application .....	24
6.3 Appendices to the application for all applicants for a gaming software licence .....	26
6.4 Appendices to the application for applicants for a gaming software licence registered abroad .....	28
7 Requests for supplementary and additional information .....	30
8 Entry into force .....	30

## 1 Legislative background, scope of application and definitions

### 1.1 The supervisory authority's power to issue orders

The supervisory authority's right to issue binding orders is based on Section 11(6) of the Gaming Act (10/2026). According to this section, the supervisory authority may issue more detailed orders concerning the content, form and appendices of licence applications.

According to Section 57 of the Gaming Act, the supervisory authority is the Licensing and Supervisory Authority. According to Section 106 of the Act, the National Police Board shall act as the competent authority referred to in Section 57 until 30 June 2027.

### 1.2 Legislation

The following regulations are relevant to the subject matter of this provision:

- Gambling Act (10/2026)
- Administrative Procedure Act (434/2003)
- Language Act (423/2003)
- Act on Electronic Services in Public Administration (13/2003)
- Act on the Openness of Government Activities (621/1999)
- Accounting Act (1336/1997)
- Business Activities Act (565/2023)
- Act on the Grey Economy Investigation Unit (1207/2010)
- Act on the Basis for State Payments (150/1992)
- Money Laundering Act (444/2017)
- Regulation of the European Parliament and of the Council on electronic identification and electronic transactions in the internal market, eIDAS Regulation (EU) No 910/2014

### 1.3 Scope

This provision applies to applicants for licences referred to in sections 5, 6 and 7 of the Gaming Act:

- applicants for exclusive licences
- applicants for a gambling licence
- applicants for gaming software licences

## 1.4 Definitions

The following definitions are used in this regulation. In this regulation, the following terms have the following meanings:

- exclusive licence: a licence granted for the forms of gambling referred to in section 5 of the Gambling Act
- gambling licence means a licence granted for the forms of gambling referred to in section 6 of the Gambling Act
- a gaming software licence means a licence that entitles the holder to manufacture, deliver, install and adapt gaming software used in the operation of games of chance by licence holders referred to in sections 5 and 6 of the Gaming Act

## 2 Formal requirements for licence applications

### 2.1 How to submit applications

In accordance with Section 11(1) of the Gaming Act, applications for exclusive licences, gaming licences and gaming software licences shall be submitted in writing to the supervisory authority. According to Section 9 of the Act on Electronic Services in Public Administration (13/2003), an electronic document submitted to the authority also fulfils the requirement for written form in the initiation and other processing of the matter.

The licences referred to in this regulation may be applied for using the supervisory authority's application form or by means of a free-form written application. If the operating licence is applied for using a free-form written application instead of the form, the written application must include the same information as specified in the application form in accordance with this regulation.

The operating licence application must be signed. The application may be signed either physically or electronically. An electronic signature must be at least an advanced electronic signature in accordance with the eIDAS Regulation (EU 910/2014). The signature on the application certifies that the information provided is correct. If the licence is being applied for on behalf of a legal entity, the person signing the application must have the right to sign on behalf of the applicant or be authorised by a person with the right to sign to apply for the licence.

### 2.2 Language of administrative proceedings

According to Section 1 of the Language Act (423/2003), the national languages of Finland are Finnish and Swedish. Section 2 guarantees everyone the right to use their own language, either Finnish or Swedish. The authority may provide better language services than required by the Language Act. According to Section 12 of the Language Act, the language of administrative matters in a bilingual authority is the language of the party concerned.

Under the provisions of the Language Act, licence applications shall be processed by the supervisory authority in Finnish or Swedish. The operating licence application and its appendices must be submitted in Finnish or Swedish, at the discretion of the applicant. The language used in the processing and decision-making will be determined when the matter is brought before the supervisory authority, based on the language in which the application was submitted.

If the application is accompanied by documents or copies of documents whose original language is other than Finnish or Swedish, the supervisory authority may, if necessary, request Finnish or Swedish translations of the documents in question. In such cases, the applicant for the licence shall be responsible for having the documents translated, for the translation costs and for delivering the translations to the supervisory authority. The translation of documents may delay the processing of the application by the supervisory authority. The supervisory authority is not responsible for any delays caused.

### 2.3 Public access to documents

The processing of licences under the Gaming Act is subject to the Act on the Openness of Government Activities (621/1999). If the application documents or their appendices contain information that the licence applicant considers confidential, the confidential information must be identified and marked in the submitted material. The grounds for confidentiality must also be stated for confidential information.

The supervisory authority shall assess the publicity of the information. The assessment shall be based on the principle of the publicity of the activities of the authority. The documents of the authority are public, unless their publicity is specifically restricted by law for compelling reasons.

### 2.4 Fees charged for processing applications

There is a fee for processing licence applications. The fee is charged for each application submitted, regardless of the outcome of the processing.

The amount of the processing fee is stipulated in the Ministry of the Interior's decree on the fees charged for police services, valid until 30 June 2027.

The amount of the processing fee is stipulated in the Decree on Fees for Services Provided by the Licensing and Supervisory Authority, effective from 1 July 2027.

## 3 Report on the persons in charge and significant owners of the licence applicant

### 3.1 Persons in charge and significant owners to be specified in licence applications

If the licence applicant is a legal entity, the application must include information on the members and deputy members of the applicant's board of directors, significant owners and executive management. The granting of licences referred to in the Gaming Act requires that, in addition to the legal entity applying for the licence, the natural persons in the above-mentioned roles meet the reliability and suitability requirements set out in Section 10 of the Act.

The concepts of significant owner and executive management are specified in section 10(3) of the Gaming Act and in the preparatory work for that provision. On this basis, a significant owner is defined as a person who directly or indirectly holds at least 25 per cent of the shares or voting rights of a limited company or, in the case of a legal entity other than a limited company, has a corresponding ownership or control. The executive management refers to the applicant's managing director and members of the management team.

If the applicant does not have a managing director and/or management team, the persons responsible for the operational aspects of the business shall be reported as members of the executive management. These persons may include, for example, persons responsible for finance, technology, marketing or regulatory compliance, responsible partners or other persons belonging to the applicant's senior management.

### 3.2 Information to be provided on the applicant's responsible persons and significant owners

In order to assess the reliability and suitability of the licence applicant, the licence application must include, as described above, all persons who are members or deputy members of the applicant's board of directors, significant owners or executive management. The application must include the first name, surname, personal identification number or date of birth (preferably personal identification number) of these persons and their role in the legal entity.

Finnish citizens and foreign nationals permanently residing in Finland who have a Finnish personal identity number shall provide their Finnish personal identity number in the application. Providing a Finnish personal identity number enables the supervisory authority to check the persons' details in the criminal and fine registers and to request a report on the fulfilment of obligations referred to in section 5 of the Act on the Investigation of the Grey Economy. In this case, no other reports assessing the reliability and suitability of the natural person in question need to be submitted, unless specifically requested by the supervisory authority.

### 3.3 Reports to be submitted on the applicant's responsible persons and significant owners

Section 11(2) of the Gaming Act stipulates the information that must be included in the licence application, unless the information is already available to the authority. As stated in the previous section (3.2) of this provision, in the case of Finnish citizens and foreign nationals permanently residing in Finland who have a Finnish personal identity number, the supervisory authority can assess their reliability and suitability by checking their details in the criminal records and requesting a report on their fulfilment of obligations. Other persons, on the other hand, must submit the information and reports necessary for assessing their reliability and suitability to the supervisory authority on their own initiative.

The following information and reports referred to in Section 11(2) of the Gaming Act shall be submitted for each member and deputy member of the applicant's board of directors, significant owner and person belonging to the executive management, if the person in question does not have a Finnish personal identity number. The following information shall also be submitted for natural persons applying for a licence who do not have a Finnish personal identity number. The information shall be submitted as separate attachments:

**Criminal record and fine register extracts**

Criminal records and fine registers must be submitted as attachments to the application. The fine register must cover the three years preceding the submission of the operating licence application, and the criminal record must cover the five years preceding the submission of the operating licence application.

A certificate equivalent to a fine and criminal record certificates that contain information on whether the person has been convicted of a criminal offence in the three years preceding the submission of the operating licence application or sentenced to imprisonment in the five years preceding the submission of the operating licence application.

**Certificates of compliance with obligations**

Sufficient information must be submitted with the licence application to assess the reliability and suitability of the applicant and its significant owners and members of the executive management. Pursuant to Section 10(2)(2–5) and Section 10(3) of the Gaming Act, the following factors must be taken into account when assessing the reliability and suitability of the applicant's significant owners and members of the executive management:

- whether the person is bankrupt or whether they are financially capable of taking care of the operations and fulfilling their statutory obligations
- whether the person has debts that are slightly higher than their solvency and are subject to enforcement, or debts that have been returned from enforcement with certificates of insolvency
- whether the person has, during the current year or the preceding three calendar years, failed to fulfil their obligations relating to taxes or statutory payments
- has the person been subject to a business ban or temporary business ban

In order to assess these questions, certificates describing the fulfilment of obligations by the applicant's responsible persons must be submitted as attachments to the application. The certificates must provide sufficient information on the fulfilment of obligations by the persons in question in order to verify that the conditions for granting the licence are met. The following certificates may be submitted as proof of the fulfilment of obligations:

- a certificate of the person's tax debt situation
- certificate of the person's enforcement situation
- certificate of whether the person is subject to a business prohibition.

Instead of the above certificates, persons may also demonstrate their reliability and suitability with regard to the matters referred to in section 10(2)(2–5) of the Gaming Act by means of other certificates, register extracts or similar official documents.

All official documents proving reliability and suitability, such as certificates and register extracts, submitted as attachments to licence applications must include the name and contact details of the authority that issued the document. The attachments must be up to date.

Documents no more than six months old, calculated from the date of submission of the application, are considered to be up to date, provided that the information has not changed since the date of the document. The applicant for the operating licence is responsible for the accuracy and timeliness of the attachments.

## 4 Applying for an exclusive licence

### 4.1 Conditions for granting an exclusive licence

According to Section 8 of the Gaming Act, an exclusive licence may be granted to a limited company controlled by the Finnish state in accordance with Chapter 1, Section 5 of the Accounting Act (1336/1997) whose field of activity is the operation of games of chance, if, on the basis of the information obtained, it can be ascertained that the applicant and its owners and management meet the reliability and suitability requirements laid down in section 10 of the Act.

According to Section 5(4) of the Gaming Act, an exclusive licence may not be granted to a gaming licence holder referred to in Section 6 of the Act.

According to Section 57 of the Gambling Act, the licence is granted by the Licensing and Supervisory Authority acting as the supervisory authority. According to Section 106 of the Act, the National Police Board shall act as the competent authority referred to in Section 57 until 30 June 2027.

### 4.2 Information to be provided in the application

The information and reports to be included in an application for an exclusive licence are specified in sections 11(2) and (3) of the Gaming Act. The following information and reports must, as a rule, be provided directly in the application:

#### **Name of the applicant**

The applicant's name refers to the name of the legal entity applying for the licence.

#### **Applicant's identification details**

The applicant's identification details refer to the business and organisation ID (Y-tunnus) for legal entities registered in Finland.

#### **Applicant's contact details**

The application must include the contact details of the legal entity applying for the operating licence. Contact details refer to the postal address, email address and telephone number.

#### **Names and contact details of contact persons**

The application must include the name and contact details of the natural person acting as the applicant's contact person in the processing of the operating licence application, as well as the name and contact details of the natural person acting as the contact person for technical matters. The contact details must include an email address and telephone number.

The application may also include information on other possible contact persons if the applicant has different contact persons for different matters. Information on other possible contact persons may be provided, for example, in the section reserved for additional information on the application form.

**Legal form of the applicant**

The application shall indicate the legal form of the applicant, such as the type of company.

Information describing the ownership and control relationships of the legal entity

The application shall include information on the members and deputy members of the board of directors of the legal entity applying for the operating licence, significant owners and natural persons belonging to the executive management. More detailed information on the disclosure of this information is provided in Chapter III of this regulation (see 'Report on the persons in charge and significant owners of the licence applicant', sections 3.1, 3.2 and 3.3 of the regulation).

In addition, the licence application shall include information on companies and entities that are directly or indirectly linked to the applicant. Companies and entities that are directly or indirectly linked to the applicant include at least<sup>1</sup> :

- a limited company that wholly or partly owns the applicant company or organisation (a minimum shareholding of 25 per cent is required)
- a limited company that is a partner in the applicant's general partnership
- a company or organisation linked to the applicant company or organisation through its responsible person or another company or organisation
- another limited company wholly owned by a member of the board of directors of the applicant limited company
- a sister company owned by the parent company of the applicant limited company

The list is indicative. The application must also include information on other companies or entities that are directly or indirectly linked to the applicant.

The names and identification details of the connected companies and entities must be provided in the application. The identification details of a company or entity refer to the business and organisation ID and, for legal entities registered abroad, the VAT number or other similar identification information.

According to Section 10(4) of the Gaming Act, the reliability and suitability of companies and organisations directly or indirectly linked to the licence applicant may also be taken into account in the licence consideration process. If necessary, the supervisory authority may request that the application be supplemented by providing information and reports describing the companies and organisations in question and their obligations.

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<sup>1</sup> HE 16/2025 vp, p. 288.

**Information on the duration of the licence applied for**

The application shall specify the period for which the licence is sought. Pursuant to Section 14(1) of the Gambling Act, an exclusive licence shall always be granted for a period of ten years at a time.

**Report on the applicant's planned forms of gambling**

The application shall specify the planned forms of gambling, i.e. all the different forms of gambling that the applicant's activities would include. According to Section 5(1) of the Gambling Act, an exclusive licence may be granted under the conditions laid down in the Act for the following forms of gambling:

- lotteries and betting games
- slot machines and casino games

Separate licences are applied for and granted for the above forms of operation. Thus, a maximum of two exclusive licences may be granted.

**Information on gaming software suppliers**

The application must include the name and identification details of the gaming software supplier to be used, as well as the name and contact details of the contact person. The identification details of the gaming software provider refer to the business ID for legal entities registered in Finland and the VAT number or other similar identification details for legal entities registered abroad. For natural persons, the identification details to be provided are the personal identification number or date of birth (preferably the personal identification number). In addition, the application must include the name and contact details of the natural person acting as the contact person for the game software supplier. The contact details shall include an email address and telephone number.

According to Section 33 of the Gaming Act, only gaming software that has been developed, delivered, installed or adapted by gaming software suppliers who have obtained a gaming software licence referred to in Section 7 of the Act may be used in the operation of games of chance.

However, in accordance with the transitional provisions of Section 106 of the Gaming Act, gaming software licences may only be applied for from 1 July 2027, and the provisions of Section 33 of the Act shall only apply to gaming software licences from 1 July 2028.

**Report on the marketing of gambling**

The application must include a free-form written explanation of where and how the money games will be marketed. The application must specify at least the main marketing methods and channels, such as website advertising, sponsorship, television, radio, print media, social media, outdoor advertising and advertising at events.

The application must specify all brand names used in marketing. Brand name refers to the marketing names used by the licence applicant, not the names of individual gambling games. In order to assess the targeting of supervisory measures, it is necessary

that the supervisory authority has accurate and up-to-date information on the planned marketing of gambling and the brand names used.

In addition, the application must describe the means or principles by which the licence applicant intends to protect minors and other vulnerable persons from the marketing of gambling. The report demonstrates that the applicant is aware of the obligations under the Gambling Act relating to the prevention and reduction of gambling harm, particularly with regard to minors and vulnerable persons.

The report on the planned marketing can be submitted either directly with the application or as a separate attachment.

#### **Report on procedures and number of trained staff for handling disputes, complaints and other issues**

The application shall include a free-form written description of the applicant's procedures for handling disputes, complaints and other issues relating to gambling. In addition, the application must state the number of persons trained and working in these tasks. The description of the procedures and information on the number of staff may be provided either directly in the application or in a separate attachment.

According to Section 49 of the Gaming Act, the licence holder must have procedures and the necessary number of trained staff in place for handling disputes, complaints and other issues related to gambling. The licence holder must respond to the player's contact within a reasonable time and provide a written response at the player's request. In addition, the licence holder must process the player's contact regarding a claim for payment of winnings and provide its opinion on the matter. The opinion must include the grounds for the payout or, alternatively, the grounds for refusing the payout.

#### **Report on measures to detect and prevent competition manipulation**

The application shall include a free-form written report on the measures planned by the applicant to detect and prevent competition manipulation. Measures to combat match-fixing may relate, for example, to the selection of betting targets, risk management methods and national and international cooperation in combating match-fixing. The report on the planned measures may be submitted either directly with the application or in a separate attachment.

According to Section 48 of the Gaming Act, the licence holder must have procedures in place to detect and prevent violations of the provisions governing the operation of games of chance, the terms of the agreement between the licence holder and the player, and the game rules, as well as competition manipulation. In addition, according to the provision in question, the licence holder must have procedures in place to enable players to report such matters immediately to the licence holder.

#### **Report on compliance with the obligations laid down in the provisions on the prevention of money laundering and terrorist financing**

The application shall include a free-form written report on how the applicant intends to fulfil the obligations laid down in the Money Laundering Act (444/2017) to combat money laundering and terrorist financing. The explanation must describe how the applicant intends to fulfil the following obligations:

- knowing the customer (Chapter 3 of the Money Laundering Act)
- obligation to obtain information and report (Chapter 4 of the Money Laundering Act)
- risk assessment and risk management methods of the reporting entity in accordance with the Money Laundering Act (Chapter 2, Section 3 of the Money Laundering Act)

The report on the planned implementation of the obligations may be submitted either directly with the application or as a separate attachment. In the report, the applicant must assess the size, nature and scope of its intended activities and their impact on money laundering risks. The report demonstrates that the applicant understands the obligations under the Money Laundering Act and the specific risks associated with its industry and the Finnish operating environment.

#### **Notification of the decision**

The application must specify where the decision is to be sent.

### 4.3 Appendices to the application

Other information and reports referred to in sections 11(2) and (3) of the Gaming Act shall be submitted as separate attachments. On the basis of the information and reports, the supervisory authority shall assess whether the applicant for an exclusive licence and its owners and management meet the reliability and suitability requirements laid down in section 10 of the Act. If necessary, the assessment shall also cover companies and entities directly or indirectly linked to the applicant. The information and reports shall also be used to assess the direction of future supervisory measures.

When considering the licence application, the supervisory authority will check the applicant's legal representative's details against the corporate fine extract from the criminal records and request a report on the fulfilment of obligations referred to in section 5 of the Act on the Investigation of the Grey Economy (1207/2010). In addition, the supervisory authority may, if necessary, request a report on the fulfilment of obligations and check the information in the criminal record extract for corporate fines also for companies and entities linked to the applicant, if they are operators registered in Finland. In the case of affiliated companies and entities registered abroad, information and reports demonstrating their reliability and suitability shall be requested separately, if necessary.

The following information and reports shall be submitted as separate attachments to the application:

#### **Authorisation to sign on behalf of a legal entity**

If the person signing the application does not have the right to sign on behalf of the company based directly on the articles of association or rules, a power of attorney granted to that person to apply for an operating licence shall be submitted as an attachment to the application.

The power of attorney must be signed. The power of attorney may be signed either physically or electronically. Electronic signatures must be at least advanced electronic signatures in accordance with the eIDAS Regulation (EU 910/2014).

**Articles of association or other description of the applicant's purpose**

The articles of association of the applicant for an exclusive licence shall be submitted as an attachment to the application. Alternatively, a free-form report describing the purpose of the applicant's activities in a manner corresponding to the articles of association may be submitted as an attachment to the application.

**Information on the applicant's financial situation**

The latest approved financial statements, including the income statement, balance sheet and notes, shall be attached to the application. In addition, a cash flow statement shall be submitted if the applicant for the licence is required to prepare one.

The financial statements must include comparative figures for the previous financial year from the income statement, balance sheet and any cash flow statement. The auditor's report on the financial statements must be submitted as an attachment to the financial statements. In addition, accounting and material lists and balance sheet specifications detailing the contents of the accounts shall be submitted as appendices.

**Description of the applicant's activities**

The applicant's latest annual report shall be attached to the application if it adequately describes the nature of the applicant's activities. Alternatively, a free-form written description of the applicant's activities may be attached to the application.

**Information on the applicant's agents**

Information on the agents used by the applicant shall be submitted as an attachment to the application. According to Section 4(1)(11) of the Gambling Act, an agent refers to a business operator or entity that receives payments related to gambling, distributes winnings, or provides premises for the use of slot machines or lottery machines.

The appendix document shall state, for each representative, the name, business ID, postal address and contact person's name and contact details of the business operator, company or organisation acting as representative. The contact person's contact details shall include their telephone number and email address.

## 5 Applying for a gambling licence

### 5.1 Conditions for granting a gambling licence

According to Section 9 of the Gaming Act, a gaming licence may be granted to a natural person or legal entity referred to in Section 2(1) or Section 3(1) or (2) of the Business Act (565/2023) if, on the basis of the information obtained, it can be ascertained

that the applicant and its owners and management meet the reliability and suitability requirements laid down in section 10 of the Act.

According to Section 6(3) of the Gambling Act, a gambling licence may not be granted to a holder of an exclusive licence referred to in Section 5 of the Act.

According to Section 57 of the Gaming Act, licences are granted by the Licensing and Supervisory Authority, which acts as the supervisory authority. According to Section 106 of the Act, the National Police Board acts as the competent authority referred to in Section 57 until 30 June 2027.

## 5.2 Information to be provided in the application

The information and reports to be included in a gambling licence application are specified in sections 11(2) and (3) of the Gambling Act. The following information and reports must, as a rule, be provided directly in the application:

### **Name of the applicant**

The applicant's name refers to the name of the legal entity or natural person applying for the licence.

### **Applicant's identification details**

The applicant's identification details refer to the business and organisation ID (Y-tunnus) for legal entities registered in Finland and the VAT number or other similar identification details for legal entities registered abroad. If the applicant is a natural person, the identification data shall be the personal identity number or date of birth (primarily the personal identity number).

If the applicant for a gambling licence is a natural person or a legal entity registered abroad that does not yet have a Finnish business and organisation ID (Y-tunnus) at the application stage, it must be submitted to the supervisory authority afterwards. The business ID is mandatory for licence holders for the payment of lottery tax, and according to Section 16 of the Gaming Act, the ID must be submitted to the supervisory authority no later than three months after the commencement of gaming operations.

### **Applicant's contact details**

The application must include the contact details of the legal entity or natural person applying for the licence. Contact details refer to the postal address, email address and telephone number.

### **Names and contact details of contact persons**

If the licence applicant is a legal person, the application must include the name and contact details of the natural person acting as the applicant's contact person in the processing of the licence application, as well as the name and contact details of the natural person acting as the contact person for technical matters. The contact details shall include an email address and telephone number.

The application may also include information on other possible contact persons if the applicant has different contact persons for different matters. Information on other possible contact persons may be provided on the application form, for example in the section reserved for additional information.

**Legal form of the applicant**

The application shall specify the legal form of the applicant, such as the type of company.

**Information describing the ownership and control relationships of the legal entity**

If the licence applicant is a legal entity, the application shall include information on the members and deputy members of the board of directors of the legal entity applying for the licence, significant owners and natural persons belonging to the executive management. If the licence applicant is a natural person, the application shall provide information on that person in the same manner as for the responsible persons of the legal entity applying for the licence mentioned above. In addition, if necessary, information demonstrating the reliability and suitability of the person in question shall be provided in the same manner as for the responsible persons of the legal entity applying for the licence. More detailed information on the information and reports to be provided on natural persons is given in Chapter 3 of this regulation (see 'Report on the responsible persons and significant owners of the licence applicant', sections 3.1, 3.2 and 3.3 of the regulation).

In addition, the licence application must include information on companies and entities that are directly or indirectly linked to the applicant. Companies and entities that are directly or indirectly linked to the applicant include at least<sup>2</sup> :

- a limited company that wholly or partly owns the applicant company or organisation (a minimum shareholding of 25 per cent is required)
- a limited company that is a partner in the applicant's general partnership
- a company or organisation linked to the applicant company or organisation through its responsible person or another company or organisation
- another limited company solely owned by a member of the board of directors of the applicant limited company
- a sister company owned by the parent company of the applicant limited company
- a company or entity in which the applicant natural person acts or has acted as a person in charge
- a company or organisation directly or indirectly linked to the applicant natural person's immediate business or organisational connections, such as a parent company whose subsidiary's board of directors includes the applicant natural person

The list is indicative. The application must also include information on other companies or organisations that are directly or indirectly linked to the applicant.

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<sup>2</sup> HE 16/2025 vp. p. 288.

The names and identification details of affiliated companies and organisations must be provided in the application. The identification details of a company or organisation refer to the business and organisation ID (Y-tunnus) and, for legal entities registered abroad, the value added tax identification number (VAT number) or other similar identification information.

According to Section 10(4) of the Gaming Act, the reliability and suitability of companies and organisations directly or indirectly linked to the licence applicant may also be taken into account in the licence consideration process. If necessary, the supervisory authority may request that the application be supplemented by providing information and reports describing the companies and organisations in question and their obligations.

**Information on the duration of the licence applied for**

The application shall specify the period for which the licence is sought. Pursuant to Section 14(2) of the Gambling Act, a gambling licence shall be granted for a maximum period of five years at a time. Depending on the application, the duration of the gambling licence shall be five years or less.

**Report on the applicant's planned forms of gambling**

A gambling licence may be granted for one or more forms of gambling. When submitting the application, the applicant for a gambling licence shall select the number of different forms of gambling for which the licence is sought. A gambling licence for several different forms of gambling can be applied for either with one joint application or with several separate applications.

The application must specify the planned forms of gambling, i.e. all the different forms of gambling that the applicant's operations would include. According to Section 6(1) of the Gambling Act, a gambling licence may be granted under the conditions laid down in the Act for the following forms of gambling:

- fixed-odds betting
- variable odds betting
- virtual betting
- electronic casino games
- electronic bingo
- electronic slot machine games

The applicant for a gambling licence determines how many different forms of operation the licence is sought for and whether a licence is sought for several different forms of operation in a single joint application or in several separate applications. A separate processing fee is charged for each separate application.

**Information about gaming software providers**

The application must include the name and identification details of the gaming software provider used, as well as the name and contact details of the contact person. The identification details of the gaming software provider refer to the business and organisation ID (Y-tunnus) for legal entities registered in Finland and the VAT number (VAT number) or other similar identification information. For natural persons, the identification information shall be the personal identification number or date of birth (preferably the personal identification number).

In addition, the application must include the name and contact details of the natural person acting as the contact person for the gaming software supplier. The contact details must include an email address and telephone number.

According to Section 33 of the Gaming Act, only gaming software that has been developed, delivered, installed or adapted by gaming software suppliers who have obtained a gaming software licence referred to in Section 7 of the Act may be used in the operation of games of chance.

However, in accordance with the transitional provisions of Section 106 of the Gaming Act, gaming software licences may only be applied for from 1 July 2027, and the provisions of Section 33 of the Act shall only apply to gaming software licences from 1 July 2028.

**Report on the marketing of gambling**

The application must include a free-form written report on where and how the gambling games will be marketed. The application must specify at least the main marketing methods and channels, such as website advertising, sponsorship, television, radio, print media, social media, outdoor advertising and advertising at events.

The application must specify all brand names used in marketing. Brand name refers to the marketing names used by the licence applicant, not the names of individual gambling games. In order to assess the targeting of supervisory measures, it is essential that the supervisory authority has accurate and up-to-date information on the planned marketing of gambling games and the brand names used.

In addition, the application must describe the means or principles by which the licence applicant intends to protect minors and other vulnerable persons from the marketing of gambling. The report demonstrates that the applicant is aware of the obligations under the Gambling Act relating to the prevention and reduction of gambling harm, particularly with regard to minors and vulnerable persons.

The report on the planned marketing can be submitted either directly with the application or as a separate attachment.

**Report on procedures and number of trained staff for handling disputes, complaints and other issues**

The application shall include a free-form written description of the applicant's procedures for handling disputes, complaints and other issues related to gambling.

In addition, the application must state the number of persons trained and working in these tasks. The description of procedures and information on the number of staff may be provided either directly in the application or in a separate attachment.

According to Section 49 of the Gaming Act, the licence holder must have procedures and the necessary number of trained staff in place for handling disputes, complaints and other issues related to gambling. The licence holder must respond to the player's contact within a reasonable time and provide a written response at the player's request. In addition, the licence holder must process the player's contact regarding a claim for payment of winnings and provide its opinion on the matter. The opinion must include the grounds for the payout or, alternatively, the grounds for refusing the payout.

#### **Report on measures to detect and prevent competition manipulation**

The application shall include a free-form description of the measures planned by the applicant to detect and prevent competition manipulation. The explanation may describe the measures planned by the applicant, for example, with regard to the selection of betting targets and risk management methods, as well as participation in national and international cooperation to combat manipulation. The description of the planned measures may be provided either directly in the application or in a separate attachment.

According to Section 48 of the Gaming Act, the licence holder must have procedures in place to detect and prevent violations of the provisions governing the operation of games of chance, the terms of the agreement between the licence holder and the player, and the rules of the game, as well as competition manipulation. In addition, according to the provision in question, the licence holder must have procedures in place to enable players to report such matters immediately to the licence holder.

#### **Report on compliance with the obligations laid down in the provisions on the prevention of money laundering and terrorist financing**

The application shall include a free-form written report on how the applicant intends to fulfil the obligations laid down in the Money Laundering Act to combat money laundering and terrorist financing. The report shall describe how the applicant intends to fulfil the following obligations:

- knowing the customer (Chapter 3 of the Money Laundering Act)
- obligation to obtain information and report (Chapter 4 of the Money Laundering Act)
- risk assessment and risk management methods for entities subject to the reporting obligation under the Money Laundering Act (Chapter 2, Section 3 of the Money Laundering Act)

A report on the planned implementation of the obligations may be submitted either directly with the application or as a separate attachment. In the report, the applicant must assess the size, nature and scope of its intended activities and their impact on money laundering risks. The report demonstrates that the applicant understands the obligations under the Money Laundering Act and the specific risks associated with its industry and the Finnish operating environment.

**Notification of the decision**

The application must specify where the decision is to be sent.

**5.3 Appendices to the application for all applicants for a gambling licence**

A prerequisite for the granting of a gambling licence is that the applicant and its owners and management meet the reliability and suitability requirements set out in Section 10 of the Gambling Act. In order to assess reliability and suitability, the application must be accompanied by sufficient information about the applicant and its financial operating conditions, if this information is not already available to the authorities. The supervisory authority shall assess, on the basis of the information and reports, whether the applicant for a licence meets the conditions for granting a licence laid down in section 10 of the Act. In addition, the information and reports shall be used to assess the direction of future supervisory measures.

The scope of the information required in the annexes to the licence application is determined by the status of the applicant. When the licence applicant is a natural person with a Finnish personal identity number or a legal person registered in Finland, the supervisory authority requests a report on the fulfilment of obligations referred to in section 5 of the Act on the Investigation of the Grey Economy. In addition, the supervisory authority may check the information on such applicants from the fine or criminal records or from the extract of corporate fines disclosed from the criminal records. However, if the licence applicant is a legal entity registered outside Finland or a natural person who does not have a Finnish personal identity number, the applicant must submit the corresponding information and reports demonstrating reliability and suitability to the supervisory authority on their own initiative. In practice, this means appendices providing information about the applicant and their good character and fulfilment of obligations. The content of these appendices is specified in more detail in section 3.3 of this regulation for natural persons and in section 5.4 of this regulation for legal persons.

If necessary, an assessment of reliability and suitability shall also be carried out with regard to companies and organisations directly or indirectly linked to the applicant. The supervisory authority may request a report on the fulfilment of obligations and check information from the criminal records register also for companies and organisations connected to the applicant, if they are registered in Finland. In the case of affiliated companies and organisations registered abroad, information and reports demonstrating their reliability and suitability shall be requested separately, if necessary.

Some of the information required for processing a licence application is not available to the supervisory authority in its entirety, even if the applicant is a legal entity registered in Finland or a natural person with a Finnish personal identity number. In such cases, all licence applicants must attach the relevant information to their application on their own initiative.

The following information and reports referred to in sections 11(2) and (3) of the Gaming Act must be attached to the application on the applicant's own initiative, regardless of the country of registration or personal identity number of the licence applicant. The information and reports shall be submitted as separate attachments:

**Authorisation to sign on behalf of a legal entity**

If the person signing the application does not have the right to sign on behalf of the company based directly on the articles of association or rules, a power of attorney granted to that person to apply for an operating licence shall be submitted as an attachment to the application.

The power of attorney must be signed. The power of attorney can be signed either physically or electronically. The electronic signature must be at least an advanced electronic signature in accordance with the eIDAS Regulation (EU 910/2014).

**Articles of association, applicant's rules or other description of the applicant's purpose**

If the licence applicant is a legal person, the articles of association or the applicant's rules must be attached to the application. Alternatively, a free-form description of the purpose of the applicant's activities, corresponding to the articles of association or rules, may be attached to the application. If the applicant for an operating licence is a natural person, a free-form description of the purpose of the applicant's activities shall be submitted.

**Information on the applicant's financial situation**

The latest approved financial statements, including the income statement, balance sheet and notes, shall be attached to the application. In addition, a cash flow statement shall be submitted if the applicant for the operating licence is required to prepare one. The financial statements must include comparative figures for the previous financial year from the income statement, balance sheet and, where applicable, cash flow statement. The auditor's report or the performance auditor's report on the financial statements must be attached to the financial statements. In addition, the financial statements shall be accompanied by accounting and material lists and balance sheet specifications detailing the contents of the accounts.

If the entity applying for a licence is unable to submit approved financial statements, the application must be accompanied by other equivalent documentation concerning the applicant's financial situation. Such a report may be, for example, a cash flow statement or financial plan that provides an adequate picture of the applicant's financial activities. The information provided must enable an assessment of the applicant's financial situation. The reports must include at least information on estimated turnover, available equity capital, available loan capital broken down into short-term and long-term loan capital, and significant agreements affecting the applicant's financial position.

A natural person applying for a licence must attach a business plan for the coming year's gambling operations to the application. In addition, information on the applicant's financial situation must be attached to the application. In order to assess the financial situation, the application must include at least information on personal assets and the composition of those assets, income approved in the previous year's taxation, debts and significant agreements affecting the person's financial position.

**Description of the applicant's activities**

The applicant's latest annual report must be submitted with the application if it adequately describes the nature of the applicant's activities. Alternatively, a free-form report describing the applicant's activities may be submitted with the application.

**Information on the applicant's agents**

Information on the agents used by the applicant shall be submitted as an attachment to the application. According to Section 4(1)(11) of the Gambling Act, an agent refers to a business operator or entity that receives payments related to gambling, distributes winnings, or provides premises for the use of slot machines or lottery machines. The appendix shall include the name, business ID, postal address and contact details of the business operator or entity acting as an agent for each agent. The contact details of the contact person shall include their telephone number and email address.

**5.4 Appendices to the application for applicants for a gambling licence registered abroad**

The following information and reports referred to in sections 11(2) and (3) of the Gaming Act shall be submitted if the applicant for an operating licence is a legal entity not registered in Finland. The information and reports shall be submitted as separate attachments:

**Extract from the trade, association or foundation register**

An extract from the trade, association or foundation register or other similar certificate showing who has the right to sign on behalf of the company or organisation shall be submitted as an attachment to the application. This document certifies that the decision to apply for a licence has been made in accordance with the rules of the company or organisation applying for the licence and that the person signing the application has the right to sign on behalf of the applicant.

**Certificate of the applicant's criminal record**

Pursuant to Section 10(2)(1) of the Gaming Act, when assessing the applicant's reliability and suitability, attention must be paid to whether the applicant has been convicted in the previous five years of an offence that can be considered to indicate that he or she is manifestly unsuitable for operating gambling games or for manufacturing, supplying, installing or adapting gaming software used in the operation of gambling games.

For the purposes of assessing the above question, a criminal record or corporate fine or other comparable certificate containing information on whether the applicant has been convicted of an offence punishable by a corporate fine during the five years preceding the submission of the licence application.

**Certificates of the applicant's fulfilment of obligations**

Pursuant to Section 10(2)(2–5) of the Gaming Act, the following factors must be taken into account when assessing the applicant's reliability and suitability:

- whether the applicant is bankrupt or whether the applicant is financially capable of managing the business and fulfilling its statutory obligations
- whether the applicant has debts that are slightly higher than their ability to pay and are subject to enforcement, or debts that have been returned from enforcement with certificates of insolvency
- whether the applicant has had any recurring or significant failures to meet their tax or statutory payment obligations during the current year or the previous three calendar years
- whether the applicant has been subject to a business prohibition or temporary business prohibition

In order to assess the above questions, certificates describing the applicant's fulfilment of obligations must be submitted as attachments to the application. The certificates must provide sufficient information on the applicant's fulfilment of obligations to ensure that the conditions for granting a licence are met. Certificates describing the fulfilment of obligations may include, for example:

- certificate of the applicant's tax debt situation
- certificate of the applicant's enforcement situation
- certificate of whether the applicant is subject to a business prohibition

The applicant may also demonstrate their reliability and suitability with regard to the matters referred to in section 10(2)(2–5) of the Gaming Act by means of other certificates, register extracts or similar official documents.

All official documents proving reliability and suitability, such as certificates and register extracts, submitted as attachments to the application must include the name and contact details of the authority that issued the document. The attachments must be up to date. Documents no more than six months old, calculated from the date of submission of the application, are considered to be up to date, provided that the information has not changed since the date of the document. The applicant is responsible for the accuracy and timeliness of the attachments.

## 5.5 Representative of an applicant established outside the European Economic Area

The licence application must include information about the applicant's representative if the applicant is located outside the European Economic Area. According to Section 12(1) of the Gaming Act, a gaming licence holder must have a representative domiciled in a country belonging to the European Economic Area if the legal person applying for the licence is not established in a country belonging to the European Economic Area or if the applicant is a natural person who is not resident in a country belonging to the European Economic Area. According to Section 12(2) of the Act, the holder of a gambling licence must authorise the representative to represent the holder of the gambling licence in all matters relating to the activities covered by the licence before the Finnish authorities, to act on behalf of the holder of the gambling licence and to receive summonses

against the holder of a gambling licence and exercise the right to speak on its own behalf or through an intermediary.

The representative referred to in Section 12 of the Gaming Act must also meet the reliability and suitability requirements set out in Section 10 of the Act. In order to assess whether these requirements are met, the licence application must also include the information specified in Section 11(2) of the Gaming Act concerning the representative.

Depending on whether the representative is a natural person or a legal person, the following information shall be provided directly in the application in the same manner as the information on the persons responsible for the licence applicants and the natural persons applying for the licence (see section 3.2 of this regulation) or the information on the legal person applying for a gambling licence (see section 5.2 of this regulation):

- Name of the representative
- Identification details of the representative
- Representative's contact details
- Name and contact details of the contact person
- Legal form of the representative
- Information describing the ownership and control relationships of the legal entity

The following information and reports shall be submitted in the same manner as separate attachments as the corresponding information and reports of the legal entity or natural person applying for a gambling licence (see section 5.3 of this regulation):

- Articles of association, rules of the representative or other description of the purpose of the representative's activities
- Information on the representative's financial situation
- Description of the representative's activities

If the representative is a legal entity registered outside Finland or a natural person without a Finnish personal identity number, the following information and documents must also be submitted with the application:

- Criminal record extract of the representative who is a natural person
- Certificates of the fulfilment of obligations by the natural person acting as representative
- Certificates of the criminal record and fulfilment of obligations of the legal entity acting as representative
- Criminal record extract of the significant owner and members of the executive management of the legal person acting as representative
- Certificates of the fulfilment of obligations by the significant owners and members of the executive management of the legal person acting as representative

The above information and reports shall be submitted in the same manner as separate attachments as the corresponding information and reports of the legal person applying for a gambling licence (see

section 5.4 of this regulation) or the corresponding information and reports concerning the persons in charge of the licence applicant (see section 3.3 of this regulation).

In addition, the authorisation referred to in Section 12(2) of the Gaming Act shall be submitted as an attachment to the application. This document authorises the representative to represent the gaming licence holder before the Finnish authorities in all matters related to the activities covered by the licence, to act on behalf of the gambling licence holder and to receive summonses against the gambling licence holder, as well as to exercise the right to speak on their own behalf or through someone else. The authorisation must be signed. The authorisation can be signed either physically or electronically. The electronic signature must be at least an advanced electronic signature in accordance with the eIDAS Regulation (EU 910/2014).

## 6 Applying for a gaming software licence

### 6.1 Conditions for granting a gaming software licence

According to Section 9 of the Gaming Act, a gaming software licence may be granted to a natural person or legal entity referred to in Section 2(1) or Section 3(1) or (2) of the Business Act (565/2023) if, on the basis of the information obtained, it can be ascertained that the applicant and its owners and management meet the reliability and suitability requirements laid down in section 10 of the Act.

According to Section 57 of the Gaming Act, the licence is granted by the Licensing and Supervisory Authority acting as the supervisory authority. According to Section 106 of the Act, the National Police Board shall act as the competent authority referred to in Section 57 until 30 June 2027.

However, in accordance with the transitional provisions of Section 106 of the Gaming Act, gaming software licences may only be applied for from 1 July 2027, and the provisions of Section 33 of the Act shall only apply to gaming software licences from 1 July 2028.

### 6.2 Information to be provided in the application

The information and reports to be included in a gaming software licence application are specified in Section 11(2) of the Gaming Act. The following information and reports must, as a rule, be provided directly in the application:

#### **Applicant's name**

The applicant's name refers to the name of the legal entity or natural person acting as the applicant.

#### **Applicant identification details**

The applicant's identification details refer to the business ID for legal entities registered in Finland and the VAT number or other similar identification details for legal entities registered abroad. If the applicant is a natural person, the identification details shall be the personal identification number or date of birth (preferably the personal identification number).

**Applicant's contact details**

The application must include the contact details of the legal entity or natural person applying for the licence. Contact details refer to the postal address, email address and telephone number.

**Names and contact details of contact persons**

If the applicant for the operating licence is a legal entity, the application shall include the name and contact details of the natural person acting as the applicant's contact person in the processing of the operating licence application, as well as the name and contact details of the natural person acting as the contact person for technical matters. The contact details shall include an email address and telephone number.

The application may also include information about other possible contact persons if the applicant has different contact persons for different matters. Information about other possible contact persons can be provided on the application form, for example in the section reserved for additional information.

**Legal form of the applicant**

The application form is used to indicate the legal form of the licence applicant, such as the type of company.

**Information describing the ownership and control relationships of the legal entity**

If the licence applicant is a legal entity, the application must include information on the members and deputy members of the board of directors of the legal entity applying for the licence, significant owners and natural persons belonging to the executive management. If the licence applicant is a natural person, the application shall provide information on that person in the same manner as for the responsible persons of the legal entity applying for the licence mentioned above. In addition, if necessary, information demonstrating the reliability and suitability of the person in question shall be provided in the same manner as for the responsible persons of the legal entity applying for the licence. More detailed information on the information and reports to be provided on natural persons is given in Chapter III of this regulation (see 'Report on the responsible persons and significant owners of the licence applicant', sections 3.1, 3.2 and 3.3 of the regulation).

In addition, the licence application must include information on companies and entities that are directly or indirectly linked to the applicant. Companies and entities that are directly or indirectly linked to the applicant include at least:

- a limited company that wholly or partly owns the applicant company or organisation (a minimum shareholding of 25 per cent is required)
- a limited company that is a partner in the applicant general partnership
- a company or organisation linked to the applicant company or organisation through its responsible person or another company or organisation
- another limited company solely owned by a member of the board of directors of the applicant limited company
- a sister company owned by the parent company of the applicant limited company

- a company or organisation in which the applicant natural person acts or has acted as a responsible person
- a company or organisation directly or indirectly linked to the applicant natural person's immediate company or organisation, such as a parent company whose subsidiary's board of directors includes the applicant natural person

The list is indicative. The application must also include information on other companies or organisations that are directly or indirectly linked to the licence applicant.

The names and identification details of affiliated companies and organisations must be provided in the application. The identification details of a company or organisation refer to the business and organisation ID and, for legal entities registered abroad, the VAT number or other similar identification information.

According to Section 10(4) of the Gaming Act, the reliability and suitability of companies and organisations directly or indirectly linked to the licence applicant may also be taken into account in the licence consideration process. If necessary, the supervisory authority may request that the application be supplemented by providing information and reports describing the companies and organisations in question and their obligations.

#### **Information on the duration of the licence applied for**

The application must specify the period for which the licence is sought. According to Section 14(2) of the Gaming Act, a gaming software licence is granted for a maximum of five years at a time.

Depending on the application, the licence shall be valid for five years or a shorter period.

#### **Notification of the decision**

The application must specify where the decision is to be sent.

### **6.3 Appendices to the application for all applicants for a gaming software licence**

A prerequisite for granting a gaming software licence is that the applicant, its owners and management meet the reliability and suitability requirements set out in Section 10 of the Gaming Act. In order to assess reliability and suitability, the application must be accompanied by sufficient information about the applicant and its financial operating conditions, if this information is not already available to the authorities. The supervisory authority shall assess, on the basis of the information and reports, whether the applicant for a licence meets the conditions for granting a licence laid down in section 10 of the Act. In addition, the information and reports shall be used to assess the direction of future supervisory measures.

The scope of the information required in the annexes to the licence application is determined by the status of the applicant. When the licence applicant is a natural person with a Finnish personal identity number or a legal person registered in Finland, the supervisory authority requests a report on the fulfilment of obligations referred to in section 5 of the Act on the Investigation of the Grey Economy. In addition, the supervisory authority may check the information on such applicants in the fine or criminal records or in the extract from the criminal records concerning corporate fines. However,

if the licence applicant is a legal entity registered outside Finland or a natural person who does not have a Finnish personal identity number, the applicant must submit the corresponding information and reports demonstrating reliability and suitability to the supervisory authority on their own initiative. In practice, this means appendices providing information about the applicant and their integrity and fulfilment of obligations. The content of these appendices is specified in more detail in section 3.3 of this regulation for natural persons and in section 5.4 of this regulation for legal persons.

If needed, the reliability and suitability of companies and organisations directly or indirectly linked to the applicant will also be checked. The supervisory authority may request a report on the fulfilment of obligations and check information from the criminal records also for companies and organisations connected to the applicant, if they are registered in Finland. In the case of affiliated companies and organisations registered abroad, information and reports demonstrating reliability and suitability shall be requested separately, if necessary.

Some of the information required for processing a licence application is not available to the supervisory authority in its entirety, even in the case of a legal entity registered in Finland or a natural person with a Finnish personal identity number. In such cases, all licence applicants must attach the relevant information to their application on their own initiative.

The following information and reports referred to in Section 11(2) of the Gaming Act must be attached to the application on the applicant's own initiative, regardless of the country of registration or personal identity number of the licence applicant. The information and reports shall be submitted as separate attachments:

#### **Authorisation to sign on behalf of a legal entity**

If the person signing the application does not have the right to sign on behalf of the company based directly on the articles of association or rules, a power of attorney granted to that person to apply for an operating licence shall be submitted as an attachment to the application.

The power of attorney must be signed. The power of attorney can be signed either physically or electronically. The electronic signature must be at least an advanced electronic signature in accordance with the eIDAS Regulation (EU 910/2014).

#### **Articles of association, applicant's rules or other description of the purpose of the applicant's activities**

If the licence applicant is a legal entity, the articles of association or rules of the applicant shall be submitted as an attachment to the application. Alternatively, a free-form description of the purpose of the applicant's activities, corresponding to the articles of association or rules, may be submitted as an attachment to the application. If the applicant for an operating licence is a natural person, a free-form description of the purpose of the applicant's activities shall be submitted.

#### **Information on the applicant's financial situation**

The latest approved financial statements, including the income statement, balance sheet and notes, shall be attached to the application. In addition, a cash flow statement shall be submitted if the applicant for the operating licence is required to prepare one. The financial statements shall include comparative data from the previous financial year for the income statement,

balance sheet and any cash flow statement. The auditor's report or the performance auditor's report on the financial statements shall be attached to the financial statements. In addition, the financial statements shall be accompanied by accounting and material lists and balance sheet specifications detailing the contents of the accounts.

If the entity applying for a licence is unable to submit approved financial statements, the application must be accompanied by other equivalent documentation concerning the applicant's financial situation. Such a report may be, for example, a cash flow statement or financial plan that provides an adequate picture of the applicant's financial activities. The information provided must enable an assessment of the applicant's financial situation. The reports must include at least information on estimated turnover, available equity capital, available loan capital broken down into short-term and long-term loan capital, and significant agreements affecting the applicant's financial position.

A natural person applying for a licence must attach a business plan for the coming year's gambling operations to the application. In addition, information on the applicant's financial situation must be attached to the application. In order to assess the financial situation, the application must include at least information on personal assets and the composition of those assets, income approved in the previous year's taxation, debts and significant agreements affecting the person's financial position.

#### **Description of the applicant's activities**

The applicant's latest annual report must be submitted with the application if it adequately describes the nature of the applicant's activities. Alternatively, a free-form report describing the applicant's activities may be submitted with the application.

### **6.4 Appendices to the application for applicants for a gaming software licence registered abroad**

The following information and reports referred to in Section 11(2) of the Gaming Act shall be submitted if the licence applicant is a legal entity not registered in Finland. The information and reports shall be submitted as separate attachments:

#### **Extract from the trade, association or foundation register**

An extract from the trade, association or foundation register or other similar certificate showing who has the right to sign on behalf of the company or organisation shall be submitted as an attachment to the application. This document certifies that the decision to apply for a licence has been made in accordance with the rules of the company or organisation applying for the licence and that the person signing the application has the right to sign on behalf of the applicant.

#### **Certificates from the applicant's criminal record**

Pursuant to Section 10(2)(1) of the Gaming Act, when assessing the applicant's reliability and suitability, attention must be paid to whether the applicant has been convicted in the previous five

for an offence that can be considered to show that they are manifestly unsuitable for operating gambling games or for manufacturing, delivering, installing or adapting gaming software used in the operation of gambling games.

For the assessment of the above question, a criminal record or corporate fine or other comparable certificate containing information on whether the applicant has been convicted of an offence punishable by a corporate fine during the five years preceding the submission of the licence application.

### **Certificates of the applicant's fulfilment of obligations**

Pursuant to Section 10(2)(2–5) of the Gaming Act, the following factors must be taken into account when assessing the applicant's reliability and suitability:

- whether the applicant is bankrupt or whether the applicant is financially capable of managing its operations and fulfilling its statutory obligations
- whether the applicant has debts that are larger than their ability to pay and are subject to enforcement, or debts that have been returned from enforcement with certificates of insolvency
- whether the applicant has had any recurring or significant failures to meet their tax or statutory payment obligations during the current year or the previous three calendar years
- whether the applicant has been subject to a business prohibition or temporary business prohibition

In order to assess the above questions, certificates describing the applicant's fulfilment of obligations must be submitted as attachments to the application. The certificates must provide sufficient information on the applicant's fulfilment of obligations to ensure that the conditions for granting a licence are met. Certificates describing the fulfilment of obligations may include, for example:

- certificate of the applicant's tax debt situation
- certificate of the applicant's enforcement situation
- certificate of whether the applicant is subject to a business ban

The applicant may also demonstrate their reliability and suitability with regard to the issues referred to in section 10(2)(2–5) of the Gambling Act by means of other certificates, register extracts or similar official documents.

All official documents submitted with the application to demonstrate reliability and suitability, such as certificates and extracts from registers, must show the name and contact details of the authority that issued the document. The attachments must be up to date. Documents no more than six months old, calculated from the date of submission of the application, are considered to be up to date, provided that the information has not changed since the date of the document. The applicant is responsible for the accuracy and timeliness of the attachments.

## 7 Requests for additional information and clarification

During the licence consideration process, the supervisory authority may request the applicant to provide supplementary information and additional clarifications deemed necessary for the resolution of the matter. According to Section 11(4) of the Gaming Act, the applicant must, at the request of the supervisory authority, provide any additional information necessary for the resolution of the matter without delay. The applicant must notify the supervisory authority without delay or within the time limit set by the authority of any factors or changes affecting the accuracy of the information provided in the licence application.

According to Section 11(5) of the Gaming Act, the supervisory authority has the right to disregard a submitted report, response or other such document if the document submitted is clearly incomplete, has been submitted after the deadline set, or does not correspond in content to the information requested by the supervisory authority or the matter under consideration.

## 8 Entry into force

This regulation shall enter into force on 1 March 2026.

Ilkka Koskimäki, Chief Superintendent

Anna Hyppönen, Lottery Administration Manager

The document has been electronically signed in the case management system. Police 11 February 2026 at 14:47. The authenticity of the signature can be verified at the registry.

### **National Police Board Lottery Administration**

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