

The Danish Gambling Authority's guidance on preventing and combating match-fixing

Match-fixing guidance

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Version history

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- First version of the guide

Introduction

1

1.1 Introduction

This guide concerns Executive Order no. 43 of 17 January 2025 on the prevention and combating of match-fixing (hereinafter the Executive Order on match-fixing). The Executive Order is issued pursuant to Consolidated Act no. 1303 of 4 September 2020 on gambling section 12(4) (hereinafter the Gambling Act).

This guide is intended for licence holders and other relevant stakeholders. The guide goes through the requirements for licence holders according to the Gambling Act and the Executive Order on match-fixing. The rules apply to all events on which betting is offered to Danish players.

In addition to reviewing the specific rules, the guide provides guidelines and interpretations on what the licence holder more specifically must do to comply with match-fixing obligations. In the areas where compliance is within the licence holder's discretion, the guidance contains a detailed description of the factors that the licence holder can include in the discretion.

The guide follows the provisions of the Executive Order on match-fixing, and the chapters of the guide are thus identical to the provisions of the Executive Order.

Legislation in the area stems from the "Agreement on a new framework for the gambling market #2: Charity lotteries and strengthened control" of 15 February 2022, in particular "Appendix B - Strengthened control and action against match-fixing".

It should be noted that the licence holder may be subject to obligations under other legislation in addition to obligations under the Executive Order on match-fixing. The licence holder's compliance with the rules in the Executive Order on match-fixing does not override obligations in other legislation, such as the Anti-Money Laundering Act. However, the licence holder's compliance with obligations in the Executive Order on match-fixing may fulfill obligations in other legislation. In this connection, the licence holder must be aware that the considerations behind the provisions are not identical, and the licence holder should therefore always consider whether there are additional requirements in other legislation that are not covered by this guide.

Certain elements of the obligations associated with the Executive Order on match-fixing will overlap with obligations according to the Anti Money Laundering Act and responsible gambling. To the extent applicable, the licence holder may also benefit from reading the Danish Gambling Authority's guide on combating money laundering and terrorist financing and the Danish Gambling Authority's guide on responsible gambling.

1.1.1 Scope of application of the Executive Order on match-fixing

The scope of the Executive Order on match-fixing is stated in section 1 of the Executive Order.

The executive order applies to licence holders who provide betting in Denmark, cf. section 11 of the Danish Gambling Act. The Executive Order on match-fixing does not apply to Greenland. Prevention and control of match-fixing is regulated in Greenland by Executive Order no. 1276 of 29 November 2019 on online betting chapter 10 and Executive Order no. 1140 of 28 August 2023 on land-based betting chapter 12.

Licence holders with a licence to offer betting according to section 11(3) (revenue-limited) and (4) (turnover-limited) of the Gambling Act are exempt from the provisions of the Executive Order on customer knowledge (section 7 and section 8), design of gambling systems (section 9), and whistleblower programme (chapter 7).

Restriction on betting of- fers

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2.1 Restriction on betting products

It is not permitted to offer betting on an event that is reserved for persons under the age of 18. This follows from section 2 of the Executive Order on match-fixing.

This means that licence holders are not allowed to offer betting on events that are generally restricted to persons under the age of 18. Such tournaments can be Danish championships or international championships in youth ranks. These leagues will typically be marked with a "U" and a number, where the "U" represents "under" and the number indicates the age of participants. Examples of tournaments where betting is not allowed are U-15 and U17.

It is the Danish Gambling Authority's assessment that a tournament categorized as U-18, but where participation is also open to players who have turned 18 in the year the tournament is held, is also subject to the restriction, as the league is essentially reserved for people under the age of 18. U19 tournaments will therefore be the youngest age category where betting will be allowed.

The provision does not prevent betting on an event where the majority of participants are under 18 years of age, as long as the tournament is open to adults. An example of this could be two 17-year-old badminton players facing each other in a Danish senior championship. The risk of offering betting on young people attending senior events should however lead to considerations in the licence holder's risk assessment and potentially business procedures.

Section 2 of the Executive Order on match-fixing concerns events, which is why the ban will also apply to the provision of betting on other than sports. An example of this can be the television show "The Junior Bake Off".

2.1.1 Case law

On 25 May 2021, the court in Odense ruled on violation of the Executive Order on Online Betting's provision prohibiting the offering of bets on sports events reserved for young people under the age of 18. The provision is identical to the current provisions in section 2 of the Executive Order on match-fixing.

The court found that the licence holder had violated the provision by not ensuring that one of their subcontractors did not offer gambling on youth sports on the licence holder's website. As the matter had previously been enforced by the Danish Gambling Authority, the Court in Odense found that the licence holder had acted grossly negligent. The licence holder was fined for the offense.

Risk assessment and risk management

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3.1 Risk assessment

The licence holder must identify and assess the risk of the licence holder being misused for match-fixing, cf. section 3 of the Executive Order on match-fixing.

The risk assessment shall be based on the licence holder's business model and as a minimum include an assessment of risk factors associated with players, betting offers, stakes, payment solutions, delivery channels and conflicts of interest.

The risk assessment shall be carried out without taking into account the mitigating measures implemented by the licence holder. Mitigation measures may include the use of subcontractors, cooperation with alarm companies to warn or monitor the development of odds or stake limits.

The risk assessment must be based on an analysis of the licence holder's business model and on relevant experience, external risk assessments or threat assessments issued by authorities or organizations. The risk assessment must thus lead to the licence holder identifying risk factors and then assessing the risk associated with the risk factors. The licence holder is generally free to choose how the assessment of the inherent risk factors is expressed. For example, the licence holder can choose to weight the individual risk factors and then classify the risk of being exploited for match-fixing as either low, medium or high.

The risk assessment thus forms the basis for the licence holder's risk management, including policies, procedures and controls. The licence holder has a duty to use its knowledge from the risk assessment to organise mitigating measures. Mitigating measures may include increased supervision of players or bets, participation in alert networks, wagering restrictions on betting markets or a limited supply of betting markets or a stop of supply on events that are assessed to pose a high risk. The greater the risk the licence holder has assessed in a given market, the greater is the requirement to the licence holder's risk management of the market.

The risk assessment must be documented. The licence holder must identify all relevant risk factors associated with the licence holder's business model and document its assessment of the risk factors.

3.1.1 Risk factors

The risk assessment shall include risk factors related to players, betting offers, stakes, payment solutions, delivery channels and conflicts of interest.

The below is only intended as inspiration, and the licence holder must always ensure that all risk factors relevant to the licence holder's business model are included.

3.1.1.1 Players

Player risk factors are an analysis of which players the licence holder has and how the licence holder's business model can be misused by player behaviour.

For example, it may be a risk factor if the licence holder has players who appear on the Danish Gambling Authority's list of active athletes, cf. section 8, or players who otherwise have a close connection to sports. A close connection to sports that may pose a risk is, for example, if the player is employed by a sports club as a coach, team leader, kit manager or therapist.

A risk factor can also be players who may have knowledge of suspicious events through employment with a gambling operator, or players who may have knowledge of suspicious events that they have received from their employment with an authority or organisation that participates in the National Platform for Coordination of the Fight against Manipulation of Sports Competitions.

A risk factor the licence holders also must assess is the risk that they can be exploited because the customer is playing in behalf of another person or another person than the identified player is using to account. This means that people who want to exploit the licence holder for match-fixing try to achieve anonymity by hiding their identity, disguise their betting activity or aim for higher earnings by spreading the bets over several gambling accounts over which they have gained control. Indications of this activity can be unusual gambling from newly created accounts or long-term customers where the customer's gambling behaviour suddenly changes. Such a change in gambling behaviour can, for example, consist of the customer betting on other sports, betting markets, countries or lower levels or placing larger bets.

In its analysis, the licence holder may also assess the risk of the licence holder receiving deposits from countries where there is assessed to be a higher risk of match-fixing or corruption. If the licence holder allows players to place deposits when the player is outside the borders of Denmark, the licence holder should assess the risk involved.

3.1.1.2 Betting offers

The licence holder must consider the risk factors for the licence holder's business model being exploited for match-fixing in relation to the bets offered.

Licence holders must assess the risk of match-fixing in the betting markets they offer. The licence holder is not obliged to assess the betting markets separately for each team or event. In the assessment, the licence holder must consider the extent to which the betting market poses a risk of match-fixing, and the assessment can for example be divided into low-medium-high risk. An example of a market that may pose a high risk is betting on the number of corners in football, as the market is estimated to have a high betting turnover, and the outcome does not directly affect the result of the match.

The assessment of betting markets must be compared with a risk assessment of the level of competition, sporting significance and risk of corruption.

By sporting significance is meant that the licence holder in their assessment must relate to the risk that may be involved in offering bets on competitions with a low sporting value. An example of a competition with low sporting value is training matches or events where none of the participants or only one participant benefits from a certain result. A risk management measure in relation to events of low sporting value can, for example, be to set lower stake limits or to limit the offering of training matches to teams that normally compete at a level the licence holder has not assessed to pose a high risk.

Level of competition and risk of corruption means that the licence holder in their assessment should assess a sport according to level and geographical location, so that the licence holder, for example, assesses whether the same risks apply to the third best Danish football league as the third best English football league. The licence holder does not need to assess each series or country separately if it is assessed that the same risk score applies to a sport at all levels or from the same geographical area, e.g. a continent.

This means that if the licence holder has assessed that betting markets for corners pose a high risk, there must be a significant effort in the risk management if the licence holder offers bets at a level of competition or from a geographical area that is also assessed to pose a high risk.

The licence holder must in their assessment include knowledge and trends they have identified themselves or knowledge, trends and decisions they have received from partners, authorities or experts. An example could be knowledge the licence holder has received from a subcontractor about an increase in suspicious bets on sports events from a given geographical area or on a specific betting market, e.g. totals on the first half in football. This knowledge

must be taken into account by the licence holder in their assessment of their offering on events from this geographical area or on the risk of the specific betting market.

If the licence holder offers a betting exchange, the licence holder must also consider the risk factors that the betting exchange entails. This is done by assessing betting markets, level of competition and risk of corruption. A particular risk of a betting exchange is that with this product, the licence holder exposes itself to a lower financial risk that may result in a greater availability of betting markets or sporting events, as it is the users who influence the supply to a greater extent through demand.

3.1.1.3 Stakes

When assessing bets, the licence holder must consider the risks involved in receiving bets on events or betting markets. The licence holder must consider both the risk posed by bets from a single customer relationship, but also the risk they assume across all customers in a given event or market.

3.1.1.4 Payment solutions

The licence holder must assess risk factors associated with all payment solutions offered by the licence holder. For example, the licence holder can include the extent to which the payment solution is suitable for concealing the origin of the funds and the extent to which the payment solution can be misused by someone else. If the licence holder uses several different payment solutions that do not differ significantly from each other, the licence holder does not need to assess the payment solutions separately but can assess them as a single category.

3.1.1.5 Delivery channels

The licence holder shall perform a risk assessment of the way in which the licence holder chooses to make its betting offer available to the players. There may be specific risk factors associated with an online offering, such as identifying a player who is not registered and identified in person. Risk factors that may apply to a land-based betting offer include the use of external retailers, self-service terminals or the misuse of Player IDs. A mitigating measure for these risks is, for example, surveillance at gambling venues.

3.1.1.6 Conflicts of interest

The licence holder must identify and assess how the licence holder's business model is vulnerable to conflicts of interest. Risk factors associated with conflicts of interest can, for example, be the licence holder's influence in sports associations through sponsorships or ownership.

Another risk factor for conflicts of interest at the licence holder is employee access to confidential information. It can pose a risk to the licence holder if the licence holder has organised itself in a way where it is possible for all employees to access knowledge about ongoing investigations of, for example, customers or athletes. This can create conflicts of interest for employees in terms of protecting or helping private relationships or sports clubs they have an interest in. It can also be a risk factor if the decision to initiate or carry out an investigation is placed solely on a single employee, as the employee can exploit knowledge or may be vulnerable to being exploited by criminals who build a relationship with the employee.

3.1.2 Updating the risk assessment

The risk assessment must be continuously updated to reflect the licence holder's current risk profile. The licence holder must update the risk assessment if there are significant changes in the licence holder's business model or other requisites for the risk assessment, e.g. changes in the general risk profile in society, legislative changes or updated national risk assessments.

To ensure that the risk assessment is updated in relation to the licence holder's current risk profile, the risk assessment must be updated at least once a year. An update does not necessarily mean a change in the risk assessment.

3.2 Policies, procedures and controls

Based on the risk assessment, the licence holder must prepare written policies, business procedures and controls, cf. section 4 of the Executive Order on match-fixing.

The licence holder's policies, procedures and controls shall at a minimum address risk management, know your customer procedures, investigation, registration and reporting obligations, employee screening and internal controls to effectively prevent, mitigate and manage the risks of match-fixing.

The licence holder must also consider whether the licence holder's business model means that there are other topics that must also be included.

Once the licence holder has completed the risk assessment, the licence holder must consider how the individual identified risks can be reduced by mitigating measures. The licence holder's policies, procedures and controls are the licence holder's mitigating measures.

The licence holder's policies, procedures and controls must be in writing, but there are no other formal requirements. The written requirement means that the licence holder must be able to document that the licence holder has assessed and documented the risks associated with the licence holder's business model, and that the licence holder can document its operational management thereof.

3.3 Policies

Policies are the licence holder's overall decisions on how the licence holder shall adapt in relation to the prevention of match-fixing. The policies are based on the risk profile that the licence holder has concluded based on the risk assessment.

In the policies, the licence holder must decide which risks the licence holder will accept, how these will be handled and how to ensure that new risks are identified and handled. This includes a description of the licence holder's overall decisions on how the licence holder should act in relation to the prevention of match-fixing.

The policies may, for example, state whether there are sports or betting markets that the licence holder, based on its risk assessment, does not want to offer.

3.4 Business procedures

Business procedures are the licence holder's concrete and operational handling of the policies, and the procedures thus describe how the licence holder will reduce the identified risks with mitigating measures.

The procedures must be based on the licence holder's business model and clearly describe how the licence holder in practice will comply with the policies' overall strategic objectives and how legislation and other regulations are complied with.

The procedures must therefore describe the specific actions that prevent the licence holder from being misused for match-fixing. The procedures must specify who is responsible for each task and how the tasks should be performed.

The procedures must be operationally applicable, and employees must therefore know how to perform tasks based on the procedures.

3.4.1 Risk management

The licence holder's risk management relates to how the licence holder chooses to organise itself based on the risks identified in the risk assessment. Risk management also relates to how the licence holder responds to and manages newly identified risks.

Risk management also means that the licence holder must monitor the risk development associated with the provision of betting and match-fixing.

3.5 Controls

The licence holder must have organised internal control to ensure that policies and procedures are followed. The internal control must be described in the licence holder's business procedures, where it must be stated what is to be controlled, how and when it is to be performed and by whom.

Controls must be organised according to the size and business model of the licence holder. Controls must be performed at appropriate time intervals.

The licence holder must ensure that there is sufficient independence between the person performing the verification and the person being verified.

The licence holder must document the controls.

3.5.1 Update

As the licence holder's risk assessment forms the basis for the licence holder's policies, procedures and controls, these must as a minimum be updated in connection with updating the risk assessment.

An update does not necessarily imply a change in content, but the licence holder must consider whether policies, procedures and controls are still adequate.

In addition, an update must be made if the licence holder chooses to change how the tasks are managed. For example, if licence holder monitoring of suspicious odds is moved from being performed internally to externally.

3.6 Training

The licence holder shall ensure that employees, betting operators and employees of betting operators have received adequate training in the prevention and control of match-fixing. This follows from section 4(2) of the Executive Order on match-fixing.

Training shall be provided as appropriate, and further training shall be provided at appropriate intervals. This should be both at time intervals set by the licence holder, and in case of changes in the area, for example when updating the licence holder's risk assessment and business procedures when it affects the employee's work functions.

The content of the training and the time intervals at which the training is to be carried out shall be organised by the licence holder on the basis of its risk assessment of the business model. This means that the licence holder, based on a risk assessment, organises the training

method themselves. This would presumably mean that time intervals between further training and the scope of the training of employees who are odds compilers or work with risk management of betting, are expected to take place more frequently and with more extensive training material than employees with betting retailers. For retailers of betting where the licence holder has limited the retailer's part in the fight against match-fixing to consist in monitoring abuse of Player ID's and a duty to inform the licence holder in case the employee suspects match-fixing, for example, if the retailer is aware that a player is closely associated with an athlete, the licence holder can meet the obligation by sending written material to the retailer on the training of employees in the tasks that are imposed on the retailer and a general description on how match-fixing can take place. Licence holders must be able to document that the retailer's employees have sufficient knowledge about their role in relation to the combat of match-fixing. The control can for example be planned in connection with other visits at the gambling premises made by the licence holder.

In connection with the start-up of agreements with new retailers, the licence holder must ensure that the retailer is aware of their tasks in relation to combatting match-fixing.

It is only a requirement that employees of licence holders involved in the provision of betting are trained in the prevention and combat of match-fixing. The same goes for retailers, where only employees involved in the sale of betting products need to be trained.

The training should ensure that employees are aware of the rules and obligations that apply to preventing and combating match-fixing. Training must ensure that employees can perform their work safely and in accordance with legal requirements. The training must also inform employees about the possibility to report violations or potential violations of the Executive Order on match-fixing committed by the licence holder.

It is not enough for training to only cover the legal requirements. The training must relate to the licence holder's business model and the associated risk factors.

The obligation to ensure that betting retailers have received adequate training also implies an obligation for the licence holder to verify that the training is actually provided to the operator's employees.

The licence holder's training should also address compliance with data protection law in the fight against match-fixing.

3.7 Prohibitions on placing bets

The licence holder shall ensure that persons who can influence the determination of the odds do not place bets with the licence holder. The obligation follows from section 5(1) of the Executive Order on match-fixing. In the provision, the group of persons is limited to beneficial owners, members of the board of directors and executive board and persons involved in the determination of bets (odds compiler) and family members to the listed groups.

The purpose of the obligation is to ensure that betting is not exploited for personal gain by persons associated with the licence holder.

There is freedom of choice for how the licence holder will ensure compliance with the rule, and the licence holder must be able to document their compliance, for example, by including the obligation in business procedures, controls and training material.

3.7.1 Suppliers

If the licence holder has chosen to outsource the task of setting odds to a supplier, the licence holder is obliged to ensure that the supplier does not allow persons involved in setting odds

to place bets with the licence holder. This follows from section 5(2) of the Executive Order on match-fixing.

The licence holder organises how the obligation is to be fulfilled, among other things based on the licence holder's business model and the extent of cooperation with the supplier. This can be done in the contractual basis between the licence holder and the supplier.

3.8 Prohibition to involve people attending the event

It follows from section 6 of the Executive Order that the licence holder may not involve persons participating in an event in setting odds on the event.

The obligation is intended to prevent conflicts of interest, abuse of insider knowledge and to prevent persons participating in the event from using their influence on odds setting to unduly influence the odds in order to gain an increased profit by manipulating the outcome of the event or elements thereof.

This means that the licence holder, when setting odds on an event, may not contact the participants of the event in order to set odds, for example by contacting players or managers to enrich the licence holder's information.

If the licence holder does not set odds itself, but receives odds from a subcontractor, the licence holder's obligation is not extended to a responsibility for the subcontractor's organisation of the odds setting. However, based on the licence holder's risk assessment, the licence holder should consider whether it constitutes an increased risk of the licence holder being exploited for match-fixing if the subcontractor involves persons participating in the event in setting odds.

Customer due dilligence

4

4.1 The Athlete List

The Danish Gambling Authority maintains a list of athletes in Denmark who can influence the outcome of a sporting event the public can bet on. The Danish Gambling Authority shares the Athlete List directly with the licence holders. The Athlete List is sent as an Excel file and a CSV file. The Athlete List is updated twice a year.

Upon receipt of an updated list, the licence holder must delete previous versions of the Athlete List.

4.2 Customer due diligence procedures

In connection with the establishment of a customer relationship, the licence holder must check whether the player is included in the Athlete List. This follows from section 8(1) of the Executive Order on match-fixing. In connection with the creation of a gambling account does not necessarily need to be the exact moment when the account is created. It will be in compliance with the rules, for example, if the licence holder checks with the Athlete List for all new customers at the "end-of-day". For customer relationships that already exist before the effective date of July 1, 2025, the licence holder will have an obligation under section 8(2) to ensure that these customer relationships are updated.

If the player appears on the Athlete List, the licence holder must be aware of the player's behaviour in relation to the player's own matches and own sport. On this basis, a suspicion may arise which the Danish Gambling Authority must be informed about, cf. section 14 of the Executive Order on match-fixing. But the licence holder is not otherwise obligated to report to the Danish Gambling Authority on players that appear from the Athlete List.

However, the licence holder may not refuse to register the player solely on the basis of the player's appearance on the Athlete List, and the restriction of the player must be proportionate to the player's sport.

The obligation to have customer due diligence procedures according to the Executive Order on match-fixing does not affect obligations on customer due diligence procedures in other legislation. Therefore, the licence holder must continue to carry out customer due diligence procedures in accordance with the rules of the Anti-Money Laundering Act.

4.2.1 Continuous monitoring

Throughout the customer relationship, the licence holder must continuously check whether the player is included in the Athlete List. This follows from section 8(2) of the Executive Order on match-fixing. The licence holder shall organise the procedure for continuous monitoring based on the risk assessment.

The licence holder can differentiate how often players are screened in relation to the Athlete List when the differentiation is based on a risk assessment. However, the assessment can never lead to certain groups of players never being screened.

4.3 Enhanced customer due diligence procedures

The licence holder must implement enhanced customer due diligence procedures in cases where there is assessed to be an increased risk of match-fixing. The obligation is stated in section 8(3) of the Executive Order on match-fixing.

The licence holder must, to the extent relevant, include the risk factors listed in the provision in its assessment of whether there is an increased risk of match-fixing. In addition, the licence holder must take into account other relevant available information about the player. Enhanced customer due diligence procedures aim to ensure that the licence holder investigates in more depth whether the player poses a risk of match-fixing or whether the player's behaviour gives rise to a suspicion of match-fixing.

The Danish Gambling Authority must be notified of bets or events suspected to be related to match-fixing.

The licence holder is not obligated to contact the player or investigate the player further than the information that the licence holder already has available about the player or that the licence holder can search for through publicly available sources.

It should be noted that the licence holder may be required to conduct further investigations under the Anti-Money Laundering Act or responsible gambling regulations.

Identifying and investigating bets

5

5.1 Set up of the gambling system

It follows from section 9 of the Executive Order on match-fixing that the licence holder must set up its gambling system in a way that enables the licence holder to identify suspicious gambling behaviour associated with match-fixing.

This means that the licence holder's gambling system must support monitoring of player behaviour in order to identify suspicious gambling behaviour associated with match-fixing. Suspicious gambling behaviour can be if a player continuously places bets on events that are suspected of being manipulated. Suspicious betting behaviour is not necessarily linked to the behaviour of a single player but can also be manifested when the betting behaviour of a number of players appears coordinated or leads to an unusual odds development that cannot be explained by new information of a sporting nature, such as changes in team lineups or injuries.

The provision imposes an obligation on the licence holder to design the gambling system to support the licence holder's obligations to investigate the circumstances and possibly report to the Danish Gambling Authority if the licence holder is aware of, suspects or has reasonable grounds to suspect that a bet or an event has or has had a connection to match-fixing.

In the risk assessment, the licence holder must have considered what may be relevant suspicious gambling behaviour in relation to the licence holder's business model.

The licence holder's gambling system must also support the obligation for the licence holder to refuse to accept a bet if the licence holder is aware of or has a reasonable suspicion of match-fixing. The gambling system must also support that the licence holder must refrain from paying out a win if a bet is investigated for match-fixing and where it cannot be excluded that the player has had knowledge of this.

The licence holder's obligations are further described in the sections below.

5.2 Investigations

The Executive Order on match-fixing imposes a number of obligations on the licence holder to ensure that the licence holder adequately responds to events where there are at least reasonable cause to suspect that the event has been manipulated.

The obligations follow from the Executive Order on match-fixing chapter 5.

5.2.1 Refuse to receive a stake

If the licence holder is aware of or has reasonable cause to suspect that a bet has been manipulated for match-fixing, the licence holder shall refuse to accept stakes on the bet.

This means that the obligation does not start until the licence holder has either knowledge or reasonable suspicion. The obligation therefore requires a stronger basis for suspicion than the obligation to investigate and report, which already arises at the time when there is a suspicion of match-fixing. Licence holders must assess any suspicions based on all existing information and not only consider suspicions that can be inferred from transactions made with the licence holder.

The obligation is limited to the betting market that is known or reasonably suspected to be manipulated. This means that if there is a reasonable suspicion that e.g. a footballer will intentionally receive a yellow card, the licence holder must refuse to receive bets on whether the

footballer receives a yellow card or other markets that are directly affected by this action, e.g. over/under number of cards or expulsion of the footballer in question.

However, the licence holder is not obliged to refuse bets on other betting markets that are not directly affected by the suspicion of a yellow card, e.g. bets on the outcome of the match. However, the licence holder must consider whether a continued offer is in accordance with the licence holder's risk assessment and business procedures.

The obligation does not mean that the licence holder is required to reject or annul bets already placed on the betting market in question. However, this does not preclude that the licence holder chooses to reject or annul a bet already placed based on a risk assessment either generally applicable or applicable to the event in question.

In case the licence holder does not reject nor annul a bet already placed, the licence holder must be aware that the licence holder can be obligated to omit paying out winnings, in accordance with section 12 of the Executive Order on match-fixing (see section 5.2.3).

5.2.2 Obligation to investigate

It is a basic requirement that the licence holder must immediately investigate circumstances where the licence holder is aware of, suspects or has reasonable cause to suspect match-fixing. The requirement is stated in section 11(1) of the Executive Order on match-fixing.

The investigations shall make it clear to the licence holder whether it is necessary to take other measures to prevent and combat match-fixing. This could be the licence holder's obligation to refuse to accept bets on reasonable suspicion, or to report to the Danish Gambling Authority or enrich a report that has already been shared with the Danish Gambling Authority.

The licence holder must have procedures in place that describes when an investigation is initiated and how the investigations will be carried out.

During the period of investigation, the licence holder must be aware that the licence holder must refrain from paying out a win if it cannot be excluded that the player has had knowledge of match-fixing. See more about the obligation in section 5.2.3.

The licence holder is obliged to record and store the results of investigations for 5 years. The duty to record includes factual information about the circumstances and a conclusion of what the investigation has led to. The note should be sufficient to refresh the memory and give others an understanding of the case and its scope. The requirement also includes investigations that result in suspicion of match-fixing being dismissed.

The obligation to record does not include cases of automatically generated alarms/flags where it can reasonably be assumed that these do not give indications of specific suspicious circumstances.

5.2.2.1 When should an investigation be initiated?

The licence holder shall immediately investigate circumstances where the licence holder is aware of, suspects or has reasonable cause to suspect match-fixing.

The licence holder must have considered which indications of match-fixing are relevant in relation to the licence holder's business operations. The indications can be linked to both player behaviour and the event, such as odds development. Investigations can also be initiated based on alerts that the licence holder has received from a business partner or in cases where the Danish Gambling Authority has shared information that suspicious circumstances have been observed around an event.

5.2.2.2 What needs to be investigated?

The licence holder's investigation shall be based on the information available to the licence holder. This can be information about the player, such as their previous gambling history. It can also be about event participants if the licence holder has knowledge that participants or the tournament has previously been in the spotlight for match-fixing.

For example, the licence holder can investigate news media, social media and similar to see if news has been published that can explain the situation. Furthermore, if the licence holder is part of an alarm network, the licence holder can use the network to uncover whether other players have also received suspicious bets. The licence holder is not obliged to contact the player in connection with its investigation. If the licence holder in accordance with the Anti-Money Laundering Act or compliance with other legislation wants to contact the player, the Executive Order on match-fixing does not prevent this.

The licence holder must investigate to what extent the licence holder is affected by the conditions. This means that the licence holder should investigate how many players have placed bets on the outcome under suspicion and possibly to what extent the players have deviated from usual behaviour in connection with the bets. For example, a player who has never bet on badminton before suddenly bets on a suspicious badminton match.

Licence holders must be aware of their obligation to report to the Danish Gambling Authority in connection with an investigation. See section 6 for more details.

5.2.3 Withholding of payment

In cases where the licence holder has received stakes in a bet that subsequently needs to be investigated due to suspicion of match-fixing, the licence holder must refrain from paying out the winnings to the player if it cannot be excluded that the player has had knowledge that the bet is manipulated. The obligation follows from section 12 of the Executive Order on match-fixing.

In its assessment, the licence holder may include the player's previous conduct, information obtained in connection with the suspicion, publicly available information and whether the player is included in the Athlete List, cf. section 7.

The licence holder may consider in their risk management whether it is appropriate for large winnings to introduce a condition that the player may not have access to the winnings (deposit the winnings in other bets) during the period when a suspicion is investigated.

However, the licence holder may pay out the winnings if the licence holder assesses that withholding the winnings would be detrimental to an investigation. An example of where the licence holder can assume that an investigation is taking place can be with persons they have previously reported to the Danish Gambling Authority or the Financial Intelligence Unit, and where the licence holder assesses that withholding the winnings will make the player aware that they are the subject of an investigation. The licence holder can pay out the winnings when the licence holder has completed its investigation and has either reported to the Danish Gambling Authority of a suspicion or if the suspicion has been disproved.

The licence holder must record its assessment together with the results of the investigation, cf. section 11(2) of the Executive Order on match-fixing.

5.3 Information from the Danish Gambling Authority

If the licence holder receives information from the Danish Gambling Authority that suspicious circumstances have been observed in connection with a betting market or event, the licence holder shall immediately investigate whether the information gives reason for the licence

holder to refuse to accept stakes on the bet. This follows from section 13(1) of the Executive Order on match-fixing.

If the licence holder has already received stakes on the bet, the licence holder must consider withholding the winnings in accordance with section 12 of the Executive Order on match-fixing.

The licence holder shall note the results of the investigations initiated based on information received from the Danish Gambling Authority. The notes must be stored for 5 years, cf. section 13(2) of the Executive Order on match-fixing. The duty to record includes factual information about the circumstances and a conclusion of what the investigation has led to. The note should be sufficient to refresh the memory and give others an understanding of the case and its scope. The requirement also covers investigations that result in the rejection of suspected match-fixing.

The obligation to record does not include cases of automatically generated alarms/flags where it can reasonably be assumed that these do not give indications of specific suspicious circumstances.

Obligation to report

6

6.1 The obligation to report

A licence holder shall immediately report to the Danish Gambling Authority if the licence holder has knowledge, suspicion or reasonable cause to suspect that a bet or event has or has had a connection to match-fixing. This obligation follows from section 14(1) of the Executive Order on match-fixing.

The reporting must be made immediately. This means that the licence holder must report to the Danish Gambling Authority immediately upon knowledge, suspicion or reasonable cause to suspect that match-fixing has taken place. The report must not be made until there is a sufficient cause for suspicion. The licence holder can do their own internal investigations to ensure that the information is correct, but the licence holder must prioritize to report as soon as possible in their assessment.

If a suspicion or reasonable suspicion occurs after the event being bet on has ended, the notification can wait until immediately after the internal business processes have been completed. Internal procedures are defined as the stage from when the licence holder observes circumstances that arouse suspicion to investigation and clarification of whether there is a reasonable basis for suspecting match-fixing. It is a prerequisite that the licence holder prioritises the processing and investigation of the suspicious circumstances so that the investigation is not delayed.

For example, there will be reasonable cause to suspect match-fixing if the licence holder identifies a development in odds that does not reflect the likely outcome of the event, or if the licence holder identifies a player whose deposits can be seen as suspicious, for example based on a deviation from previous gambling behaviour.

Likewise, there will be a presumption if the total stakes from Danish players exceed what might be expected for the event or market. The licence holder will also be obliged to report when they suspect that a market, they have offered at a Danish sporting event is match-fixed, regardless of whether they have received stakes from Danish players on the market.

The obligation to report applies regardless of whether the licence holder, based on a risk assessment, chooses not to offer betting on the event. This means that if a licence holder chooses not to offer betting on an event because the licence holder has knowledge, suspicion or reasonable cause to suspect that the event is or will be manipulated, the licence holder must report to the Danish Gambling Authority.

The reporting process is described in more detail in the Danish Gambling Authority's guide on the obligation to report.

When the licence holder reports to the Danish Gambling Authority, the licence holder must also be aware of whether the matter must also be reported to the Danish Financial Intelligence Unit, in accordance with the obligations of the Danish Anti-Money Laundering Act. A reporting to the Danish Gambling Authority does not fulfill the obligation to report in the Danish Anti-Money Laundering Act.

Whistleblower programme

7

7.1 Whistleblower programme

The licence holder must establish a whistleblower programme where their employees can report violations or potential violations of the executive order on match-fixing committed by the licence holder, including by employees, beneficial owners, members of the board of directors, the executive board and persons involved in setting odds (odds compiler) via a special, independent and autonomous channel. It must be possible to report anonymously. It is therefore a requirement that complete anonymity can be guaranteed so that it is not possible to trace the sender. The reports should also only be accessible to the department or employee handling them. This is stated in section 15 of the Executive Order on match-fixing.

The independence and autonomy of the programme means that it must be independent of day-to-day management and that reports can be made outside of normal procedures.

The requirement for a whistleblower programme applies to all companies with more than five employees. The programme must be established no later than three months after the licence holder has hired the sixth employee. All employees who have an employment contract with the licence holder must be counted in the number of employees.

If the licence holder already has a whistleblower programme as a result of other legislation, this programme may also include reports under the Executive Order. However, it must be possible for the employee to report anonymously, regardless of whether this is required by the legislation under which the existing system is established.

A whistleblower programme can also be outsourced to an external supplier or established through a collective agreement, e.g. by establishing a trade union to which employees of the gambling operator can make reports.

7.1.1 Handling of reports

The licence holder must follow up on reports to the programme and document in writing how the licence holder has followed up on the reports.

The Danish Gambling Authority as a supervisory authority may request to see the written documentation that has been stored. The documentation must document that the licence holder has adequately followed up on the reports received. This means that the documentation must, as a minimum, contain information about what the report is about, documentation of how the report has been processed and what decisions have been made as a result of processing the report.

Exchange of information

8

8.1 Exchange of information

The exchange of information between the licence holder and the Danish Gambling Authority can be done with reference to two different provisions in the Danish Gambling Act. Section 12(1) of the Danish Gambling Act allows the Danish Gambling Authority to request information about a player from the licence holder if the Danish Gambling Authority assesses that it is necessary to detect or investigate match-fixing. In addition, section 12a(1) of the Danish Gambling Act allows the Danish Gambling Authority to exchange necessary information about match-fixing with licence holders. Information that the Danish Gambling Authority can share with the licence holder according to section 12a(1) of the Danish Gambling Act can be information about suspicious events or trends that the licence holder should be aware of.

8.1.1 When the licence holder provides information at the request of the Danish Gambling Authority

The Danish Gambling Authority may request the licence holder to provide information about a player's behaviour and identity if the Danish Gambling Authority assesses that it is necessary to receive the information in order to detect or investigate matters related to match-fixing.

The licence holder is obligated to provide the information to the Danish Gambling Authority, cf. section 12(1) of the Danish Gambling Act.

The licence holder must be aware of the remarks to section 12(1) of the Danish Gambling Act where it is specified that a request from the Danish Gambling Authority to disclose information about players' behaviour or identity may not form the basis for a decision made by the licence holder to terminate the customer relationship. A decision to terminate a customer relationship must be supported by data or a procedure that has been identified by the licence holder itself.

8.1.2 When the licence holder exchanges necessary information about match-fixing with the Danish Gambling Authority

The Danish Gambling Authority can exchange necessary information about match-fixing with licence holders according to section 12a(1) of the Danish Gambling Act. The provision permits exchange of ordinary personal data, which means that sensitive personal data covered by Article 9(1) of the General Data Protection Regulation cannot be exchanged under the provision.

8.1.3 Exceptions to data protection law

The licence holder must be aware that certain exceptions to the data protection rights of data subjects apply to the exchange of information between the Danish Gambling Authority and the licence holder. Section 12(3) of the Gambling Act exempts the information from the General Data Protection Regulation's rules on the duty of disclosure (Articles 13-14) and the right of access (Article 15).

In addition to the exceptions to selected rights under data protection law, the licence holder must be aware of the duty of confidentiality in section 12a(3) of the Gambling Act.

8.2 Confidentiality

When the Danish Gambling Authority exchanges confidential information about match-fixing with the licence holder, the licence holder must be particularly aware that a violation of the duty of confidentiality in section 12a(3) of the Danish Gambling Act can be punished under section 152-152e of the Danish Criminal Code.

Provision of betting services in Greenland

9

9.1 Preventing and combating match-fixing in Greenland

The Executive Order on match-fixing does not apply to the provision of betting in Greenland. Prevention and control of match-fixing is regulated in Greenland according to the Executive Order on online betting chapter 10 and the Executive Order on land-based betting chapter 12.

9.2 Suitable measures

It follows from section 26 of the Executive Order on online betting and section 27 of the Executive Order on land-based betting that the licence holder must take measures that are suitable to reduce the risk of match-fixing in betting.

The licence holder shall consider the risks of match-fixing associated with the licence holder's betting services when the licence holder determines which measures will be suitable to reduce the risk of match-fixing.

The licence holder must look holistically at the betting offer and not only consider which betting markets are offered. The licence holder should also consider whether players, payment solutions and delivery channels may pose a risk of match-fixing that needs to be addressed with appropriate measures. Furthermore, it may be relevant for the licence holder to assess whether there is a risk that the licence holder can be exploited for match-fixing due to the licence holder's organisation.

A suitable measure would also be to have established business procedures or have signed cooperation agreements on sharing suspicious gambling from Greenland.

9.3 Refuse to receive a stake

The licence holder must refuse to accept stakes in bets offered in Greenland where there is a reasonable suspicion of match-fixing. It follows from section 26 of the Executive Order on online betting and section 27 of the Executive Order on land-based betting

The obligation is limited to the betting market that is reasonably suspected of being manipulated. This means that if there is a reasonable suspicion that e.g. a football player will intentionally receive a yellow card, the licence holder must refuse to receive bets on whether the football player receives a yellow card or other markets that are directly affected by this action, such as over/under number of cards or suspension of the football player in question.

However, the licence holder is not obliged to refuse bets on other betting markets that are not directly affected by the suspicion of a yellow card, e.g. bets on the outcome of the match. Nevertheless, the licence holder must consider whether the suspicion gives reason for the licence holder to take further action as a result of the appropriate measures.

9.4 Limiting the supply of bets

There is a ban on offering betting in Greenland on sporting events reserved for young people under the age of 18. This follows from section 27 of the Executive Order on online betting and section 28 of the Executive Order on land-based betting.

This means that licence holders are not allowed to offer betting on sports events that are generally restricted to persons under the age of 18. Such tournaments can be Danish championships or international championships in youth ranks. These leagues will typically be marked with a "U" and a number, where the "U" represents "under" and the number indicates the age of participants. Examples of tournaments where betting is not allowed are U-15 and U17.

It is the Danish Gambling Authority's assessment that a tournament categorized as U-18, but where participation is also open to players who have turned 18 in the year the tournament is held, is also subject to the restriction, as the league is essentially reserved for people under the age of 18. U19 tournaments will therefore be the youngest age category where betting will be allowed.

The provision does not prevent betting on an event where the majority of participants are under 18 years of age, as long as the tournament is open to adults. An example of this could be two 17-year-old badminton players facing each other in a Danish senior championship. The risk of offering bets on young people attending senior events should, however, lead to consideration of whether appropriate measures should be taken for the betting offer.

Section 27 of the Executive Order on online betting and section 28 of the Executive Order on land-based betting are limited to sporting events reserved for young people under the age of 18.

