International Comparative Legal Guides

Gambling 2026

A practical cross-border resource to inform legal minds

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Marc W. Dunbar, International Masters of Gaming Law

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1 Relevant Authorities and Legislation

1.1 Which entities regulate what type of gambling in your jurisdiction?

Relevant Product		Who regulates it in online form?	Who regulates it in land-based form?
Gaming	Casino gaming (including slots and casino table games such as roulette & blackjack)	Hellenic Gaming Commission (HGC).	
	Poker		
	Bingo		
Betting	Betting		
	Sports/horse race betting (if regulated separately to other forms of betting)		
	Fantasy betting (payment to back a 'league' or 'portfolio' selection over a period of time, for example in relation to sport)	HGC.	
Lotteries	Lotteries	HGC.	
Social/ Skill/ Sweep- stakes arrange- ments	"Social" gaming with no prize in money or money's worth	Not regulated.* * Under Greek law, arrangements whose outcome depends on luck or on technical and intellectual ability – but without participants having any direct or indirect pecuniary burden – are not considered games of chance and are therefore not regulated.	
	Sweepstakes models (such as free-to-play casino games with prizes)	HGC, if prizes involve monetary value.	
	Skill games and competitions with no element of chance	Not regulated.* * Under Greek law, arrangements whose outcome of ability – but without participants having any direct of games of chance and are therefore not regulated.	

1.2 Specify: (i) the law and regulation that applies to the Relevant Products in your jurisdiction; and (ii) — in broad terms — whether it permits or prohibits the offer of Relevant Products to persons located in your jurisdiction.

(i) Applicable laws and regulations in Greece

The principal pieces of legislation governing and authorising the offer of the Relevant Products in Greece are as follows:

- Law 4002/2011 "Regulating the gaming market" (the Law), which sets the framework for licensing, supervision and operation of games of chance.
- Law 2206/1994 On the establishment and operation of casinos.
- Law 4512/2018 Amending provisions on the casino sector and introducing further regulatory structures.
- Supplementary decisions and regulations issued by the Minister of Finance and the HGC, including:

Ministerial decisions

- T/6736/2003 Regulation on Administrative Control and Supervision of the Operation of Casinos.
- 79835 EΞ 2020/2020 Gaming Regulation on Organising and Conducting Online Games of Chance.
- 79314 E ± 2020/2020 Gaming Regulation on Conducting Games of Chance via Video Lottery Terminals (VLTs).
- 132934 EΞ 2022/2022 General Regulation for the Organisation and Conduct of State Lotteries.
- 79292 EΞ 2020/2020 Regulation on Commercial Communication Regarding Games of Chance.
- 79305/27.7.2020 Regulation on Suitability of Persons.

HGC decisions

- 509/1/11.09.2020/2020 Suitability Permit for Affiliates of Online Gaming Promotion Activities and Registration in the Register of Affiliates.
- 331/3/07.06.2018 Conduct and Control of Games of Chance via VLT-type Gaming Machines.
- 253/3/30.03.2017 Conduct and Control of Electronic Technical Amusement Games With Gaming Machines.

(ii) Permissibility of offering Relevant Products in Greece

- Permitted All the Relevant Products (casino gaming, poker, bingo, betting, sports/horse race betting, fantasy betting, lotteries and sweepstakes with monetary prizes) can be offered legally in Greece, but only by operators holding the appropriate licence issued by the HGC.
- Prohibited without a licence Offering these products without an HGC licence is illegal and subject to administrative sanctions (including fines of up to €2 million and potential criminal prosecution).
- Not regulated Products such as "social" gaming without monetary prizes or skill competitions with no element of chance are outside the scope of Greek gaming law and therefore neither licensed nor prohibited.

2 Application for a Licence and Licence Restrictions

- 2.1 What regulatory licences, permits, authorisations or other official approvals (collectively, "Licences") are required for the lawful offer of the Relevant Products to persons located in your jurisdiction?
- Prior licensing from the HGC is mandatory for the lawful offer of any Relevant Product in either land-based or online form.

- Online games of chance require an online gaming licence (either Type A for online betting, Type B for online casino and poker, or both).
- Land-based casinos, betting shops and lottery operators require separate licences specific to their operation type.
- Amusement skill games without an element of chance and without any monetary stake or prize are not subject to licensing, provided that all statutory conditions are met.
- The operation of VLTs is exclusively granted to OPAP S.A. (the licensed Greek gaming monopoly operator for VLTs), with a cap of 25,000 VLTs nationwide under the current concession.

2.2 Where Licences are available, please outline the structure of the relevant licensing regime.

In relation to electronic amusement skill games played on gaming machines, these may only be offered by operators holding the relevant operating licence from the HGC. The games, the machines and the premises must be certified in accordance with the applicable technical regulations. Purely skill-based games without monetary stakes are not considered games of chance and may be offered without a licence if they meet all legal conditions.

The lawful offer of games of chance – whether conducted online or through gaming machines (land-based) – requires the prior issuance of an administrative licence under the Law.

For games of chance conducted via the internet, two licence types are available:

- Type A Licence for conducting online betting.
- Type B − Licence for other online games of chance, including casino games, poker, bingo and other RNG-based games.

In addition, a Suitability Permit is required for affiliates (B2B) cooperating with licensed operators to promote the Relevant Products, under HGC Decision 509/1/11.09.2020/2020.

For casinos, the Law distinguishes between:

- Simple casino licence Allows gaming rooms (and ancillary facilities) combined with hotel accommodation of at least four stars or three keys classification under Law 4276/2014, plus shops, catering, leisure and entertainment facilities.
- Wide-range casino licence Allows gaming rooms and ancillary facilities combined with hotel accommodation of at least five stars, plus shops, catering, leisure facilities and at least one special tourist infrastructure element (e.g. conference centre, golf course, thalassotherapy centre, tourist port, ski resort, theme park, sports training centre, hydrotherapy centre, water park, etc.).

2.3 What is the process of applying for a Licence for a Relevant Product?

Generally, all licence applicants must submit their application and supporting evidence to the HGC.

For the online gaming licence, applicants must submit to the HGC an application including the type of licence applied for and the type of online gaming they intend to conduct. The application must be accompanied by the supporting documents referred to in article 46 of the Law and a fee of ϵ 10,000 for participation in the procedure. Each candidate may be granted both types of licences, which are personal and may not be transferred or assigned in any way, in whole or in part.

An online gaming licence is granted by a decision of the HGC, which is issued within two months from the submission to it of an application, in accordance with the procedure set forth in the Law. Failure of the HGC to issue a decision within the above deadline shall constitute an implicit rejection of the application.

2.4 Please give a summary of the following features of any Licences: (i) duration; (ii) vulnerability to review, suspension or revocation.

Online games of chance licences have a seven-year term from their award and include the specific terms governing the games of chance for which they are issued. At least one year prior to expiry of a valid licence, the licence holder may, following an application to the HGC, request its extension for an equal period.

The term of validity of the licence to operate a simple casino business is 15 years and for a wide-range casino, 30 years.

The HGC has the power and the authority to issue, suspend and revoke licences and certifications, and to supervise and control the conduct and operation of games of chance.

2.5 By Relevant Product, what are the key limits on providing services to customers? Please include in this answer any material promotion and advertising restrictions.

Under Greek law, the key limits on providing services to customers depend on the type of Relevant Product offered.

For casino gaming (including slots and table games such as roulette and blackjack), poker, bingo, betting (including sports betting, horse race betting and fantasy betting) conducted either online or land-based, the provisions of article 32 of the Law apply. Participation is allowed only to natural persons aged 21 years or over, whose identity has been verified through the Central Monitoring and Control System or another approved method. Where such games are offered via gaming machines, the minimum stake is $\mathbf{\in} 0.10$ and the maximum stake is $\mathbf{\in} 2$. Gaming machines may be operated only by inserting coins or banknotes, reinvesting winnings or using a prepaid card linked to the player's identity. The offer of games of chance on credit or with discounted participation costs is prohibited, as is the conduct of games where the player may lose more than their stake in a single participation.

Lotteries are also regulated by the HGC and subject to similar restrictions, although the minimum participation age is 18. Lotteries must comply with product-specific rules on ticket pricing, prize payout structures and distribution, in addition to general responsible gambling obligations.

For sweepstakes with prizes of monetary value, an HGC licence is required, and the minimum participation age is generally 18. These products must comply with the HGC's regulations on games of chance, including prohibitions on offering credit for participation and restrictions on targeting vulnerable groups.

Social games and skill games with no element of chance and no prize in money or money's worth are not regulated under Greek gaming law, provided they meet the statutory definition of such games. Consequently, there are no statutory age or stake limits for these products.

Across all regulated products, commercial communication is subject to strict controls under the HGC's Regulation of Games of Chance and Regulation on Commercial Communication Regarding Games of Chance. All marketing must:

- Include a reference to the prohibition for underage or self-excluded persons.
- Include information on helplines and services for gambling addiction.
- Avoid glamorising gambling, targeting minors or implying that gambling is a means of financial success.
- Not promote the offer of credit for participation in games of chance.

2.6 What are the tax and other compulsory levies?

Tax obligations are imposed on both the game operators and the players.

Profit generated from operation of the games regulated by the Law are taxed according to the general income tax provisions.

For all games of chance, participation of the Greek State in the revenues is set at 35% of the gross profit regarding amounts generated from the licence holder's activity. For horse racing betting, the same participation amounts to 30%.

Players' winnings are also subject to tax on a progressive scale.

For winnings from online games of chance:

- 0% tax for a player's net profit of up to €100;
- 15% tax for a player's net profit of up to €500; and
- 20% tax for a player's net profit of €500.01 or more.

For winnings from betting (per betting slip):

- 0% tax for a player's net profit of up to €100;
- 2.5% tax for a player's net profit of up to €200;
- 5% tax for a player's net profit of up to €500; and
- 7.5% tax for a player's net profit of €500.01 or more.

2.7 What are the broad social responsibility requirements?

According to the Law and HGC Decision 163/5/09.07.2015 on Principles of Responsible Gaming, licensed operators must ensure that gambling activities are conducted in a socially responsible manner to prevent problem gambling and protect vulnerable persons.

The broad requirements include the following:

- Prohibition of participation by persons under 21 and by players on the self-exclusion register.
- Provision of responsible gaming information, including game guides, risk awareness materials and clear selfexclusion procedures.
- Availability of a dedicated helpline for responsible gaming support, player assistance and guidance for vulnerable persons.
- Player protection tools such as deposit, loss and time limits, and reality checks during play.
- Restrictions on marketing, ensuring that advertising does not target minors or vulnerable groups, and includes references to age limits, exclusions and available support services.
- Staff training in recognising problem gambling behaviour and enforcing responsible gaming measures.
- Ongoing monitoring and compliance with HGC inspections and enforcement actions for breaches.

2.8 How do any AML, financial services regulations or payment restrictions restrict or impact on entities supplying gambling?

Pursuant to Law 4557/2018 (on AML), entities supplying gambling services are obliged to apply customer due diligence

measures upon the collection of winnings, the wagering of a stake, or both, when carrying out transactions amounting to €2,000 or more, whether the transaction is carried out in a single operation or in several operations which appear to be linked.

Also, pursuant to HGC Decision 554/5/21.04.2021, the HGC obliges entities supplying gambling services to, among others, appoint a compliance officer who is responsible for taking every measure needed for the avoidance of money laundering transactions and reporting any such transaction to the competent authorities.

Furthermore, according to the Law:

- Profits from games of chance played online must be deposited in an account kept by the player at a credit institution or payment institution, established and lawfully operating in Greece or in any other Member State of the EU or the EEA.
- The payment of the price for participation in an online game of chance must be made exclusively to a licence holder, without the intervention of any third party, except credit institutions or payment institutions established and lawfully operating in Greece or in any other Member State of the EU or the EEA, in a manner that ensures the players' identification.

2.9 Does your jurisdiction permit digital currencies to be used for gambling. Are there any specific licensing or operational requirements for operators accepting digital currencies (including cryptocurrencies)?

Greece does not currently permit the use of digital currencies (including cryptocurrencies such as Bitcoin or Ethereum) for gambling payments or payouts by licensed operators. Under the Law and HGC regulations, all transactions must be processed via regulated banks or licensed payment institutions operating in Greece, the EU or the EEA, ensuring full player identification. No specific licensing regime exists for operators accepting digital currencies, and doing so would breach current licence conditions.

3 Online Gambling

3.1 How does local law/regulation affect the provision of the Relevant Products online, both from: (i) operators located inside your jurisdiction; and (ii) operators located outside your jurisdiction?

(i) Operators located inside Greece

Only operators holding a valid HGC licence – either for online betting or for other online games (including casino games and poker) – may lawfully provide Relevant Products to persons located in Greece.

(ii) Operators located outside Greece

Operators without an HGC licence are prohibited from targeting or accepting Greek players. The HGC maintains and regularly updates an online gambling blacklist containing unlicensed websites. Internet Service Providers (ISPs) must block access to these domains, and payment institutions are prohibited from processing transactions to or from accounts linked to blacklisted operators.

Offshore operators that offer Relevant Products without a licence face administrative sanctions, including financial penalties and blocking measures, even if they are regulated in another jurisdiction.

In practice, the regulatory framework is designed to ringfence the Greek online gambling market, allowing only HGC-licensed entities to operate and therefore make it difficult for unlicensed offshore operators to reach Greek customers.

3.2 What other restrictions have an impact on Relevant Products supplied online?

In addition to licensing, online gambling in Greece is subject to the following key restrictions:

- Payment restrictions Credit and payment institutions lawfully operating in Greece or within the EU/EEA are prohibited from processing deposits or withdrawals linked to unlicensed operators listed on the official HGC blacklist. Transactions for licensed operators must be conducted exclusively through EU/EEA-regulated institutions, ensuring the full identification of players.
- 2. Advertising and promotion controls Commercial communication regarding online games of chance is regulated by the HGC's Regulation on Commercial Communication Regarding Games of Chance. Advertising must not target minors or vulnerable persons, must include responsible gambling warnings and helpline details, and must avoid misleading content, excessive play encouragement or offering gambling on credit.
- Player protection measures Licensed operators must offer tools for players to set deposit, loss and time limits, as well as self-exclusion functionality. Games must be designed in a way that avoids exploiting behavioural vulnerabilities.
- 4. Technical and compliance requirements All online games must be certified by the HGC before launch. Operators must store and provide transaction and gameplay data to the HGC for monitoring and enforcement purposes.
- 5. Blacklisting and access blocking The HGC maintains and regularly updates a blacklist of unlicensed gambling websites. Greek ISPs are required to block access to these websites, and payment restrictions ensure that no transactions are processed to or from them.

4 Enforcement Powers/Sanctions

4.1 Who is liable under local law/regulation?

The operator/provider, supplier, importer, affiliate and the player(s).

4.2 What form does enforcement action take in your jurisdiction? What appetite for and track record of enforcement does your local regulatory authority have? Have fines, licence revocations or other sanctions been enforced in your jurisdiction?

In Greece, enforcement of gambling laws is primarily carried out by the HGC. Enforcement actions can take multiple forms depending on the severity and nature of the violation:

- Administrative sanctions The HGC may impose fines, issue warnings or mandate corrective actions on operators who breach regulatory requirements, including technical, operational or responsible gambling obligations.
- Suspension or revocation of licences For serious or repeated breaches, the HGC has the authority to suspend or permanently revoke a gambling licence. This applies to both land-based and online operators.

- Blocking access to unlicensed operators In coordination with ISPs, the HGC enforces blacklists of unlicensed websites, ensuring that Greek players cannot access illegal gambling services. Payment service providers are similarly instructed to block financial transactions with unlicensed operators.
- 4. Criminal referrals In cases involving fraud, money laundering or other criminal activity, the HGC may refer matters to law enforcement authorities for investigation and prosecution.

The HGC has a proactive and strict approach to enforcement, reflecting Greece's commitment to maintaining a fully regulated gambling market. There is a demonstrable record of action:

- Fines and penalties Licensed operators have been fined for non-compliance with AML obligations, commercial communication rules and technical certification requirements.
- Licence revocations Licences of operators that failed to meet regulatory obligations or engaged in illegal activity have been revoked.
- Online blacklisting Numerous unlicensed online gambling platforms have been blocked in Greece, often in combination with financial transaction restrictions.

Overall, the HGC is active in enforcing compliance, emphasising both consumer protection and the integrity of the gambling market. The regulatory framework provides clear powers for monitoring, sanctioning and deterring non-compliance.

4.3 What steps are being taken against illegal or unlicensed gambling operators?

A number of coordinated steps are being taken to combat illegal or unlicensed gambling operators:

 Blacklisting of illegal operators – The HGC maintains a list of unlicensed operators. Access to websites on this list is blocked through collaboration with ISPs, preventing Greek players from accessing illegal platforms.

- Payment and financial restrictions Credit institutions and payment service providers are prohibited from processing payments to or from unlicensed gambling operators. This includes deposits for participation and payouts of winnings, effectively cutting off the financial channels for illegal operators.
- Administrative and criminal actions The HGC can impose fines, warnings or other administrative penalties on entities facilitating illegal gambling. For more serious offences, cases may be referred to law enforcement authorities for criminal prosecution.
- Public awareness and education The HGC publishes information to raise awareness among players about the risks of unlicensed gambling and provides guidance on how to check if an operator is legally licensed.
- Monitoring and investigation The HGC actively monitors both online and offline gambling activities to detect illegal operators, including through market surveillance, reporting by licensed operators and tip-offs from the public.

These measures are designed to protect consumers, ensure fair gaming and preserve the integrity of Greece's regulated gaming market.

5 Anticipated Reforms

5.1 What (if any) intended changes to the gambling law/regulations are being discussed currently?

Although there are no major legislative changes currently under way, the Greek government is actively exploring targeted reforms to address specific operational issues and enhance the effectiveness of its gambling regulatory framework.



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Greece

Greece



Dimitris Emvalomenos qualified in 1987, having received an LL.B. from the University of Athens Law School; he then received an LL.M. from the University of London, Queen Mary College. He is also accredited as a mediator in the UK by the Centre for Effective Dispute Resolution (CEDR), London, and in Greece by the Central Mediation Committee, Ministry of Justice, Athens.

Dimitris' areas of practice include commercial law, product liability/safety, consumer law, competition, network contracts, M&As, securities/ NPLs, gambling, ADR/mediation/commercial law litigation.

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BGP traces its origins to Law Office Marios Bahas in 1970. In 1988, the original firm merged with Law Office Yanos Gramatidis. In 1990, it was named Bahas, Gramatidis & Associates with the participation of Dimitris Emvalomenos. Finally, in 2002, Bahas, Gramatidis & Associates merged with Law Office of Athanassios Felonis & Associates and Law Office Spyros Alexandris & Associates to form BGP.

BGP is a premier Greek corporate law firm advising institutions, private capital and sovereigns on complex strategic matters. Our full-service practice covers corporate law, M&A, banking, energy, real estate, technology and cross-border disputes. We combine legal precision with business insight to help clients seize opportunities and manage risks. Operating as one integrated team, we merge deep local knowledge with an international perspective, delivering clear, strategic and high-quality advice.

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- Relevant Authorities and Legislation
- Application for a Licence and Licence Restrictions
- Online Gambling
- **Enforcement Powers/Sanctions**
- **Anticipated Reforms**

