



# EOA Intel

Report 2020

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# Contents

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06

**A Rocky situation?**

As the UK's departure from the EU continues to rumble on, *EGR* investigates how Gibraltar's egaming companies have been preparing for Brexit and whether this protracted divorce has eroded the tier-one remote gaming hub's standing

10

**Servicing the world**

Continent 8 looks at some of the unique challenges and nuances associated with operating and providing services across the online global gambling world

15

**The strong Rock**

Andrew Lyman of the government of Gibraltar assesses the current state of the domicile and the flexible regulatory approach which fosters an environment of innovation

17

**Heading to the cloud**

Danny Hook of Rockolo identifies the importance of the cloud

19

**The year-round compliance service – Compliance 365**

Matthew Robins and Tom Collister of SMP Partners discuss their Compliance 365 product and how it makes life easier for their operators

21

**Looking ahead – egaming on the Isle of Man**

Lyle Wrxall, CEO of Digital Isle of Man, gives his views on the evolving world of egaming and how the Isle of Man will maintain its reputation as a global egaming hub in 2020 and beyond

## *Introduction*

# Selecting the best

**T**his *EGR* Jurisdictions report examines the recent developments in some of the world's most significant online gaming hubs.

The failure to adhere to the ever increasing roster of regulatory demands can result in hefty fines. Systems and technologies which help vendors to keep abreast of, and in compliance with, regulatory demands form a key part of this report.

The experts within this report also give thought to the latest developments within their jurisdiction, and the service complement which will make domiciling in their respective jurisdictions appealing.

Elsewhere, the latest thinking on the ongoing status of Brexit and how it may affect the egaming industry is reflected upon.

Overall the report will give our readers key insights into some of the best jurisdictions in which to run their operations.

By Ross Law | *Report editor*

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# A Rocky situation?



As the UK's departure from the EU continues to rumble on, *EGR* investigates how Gibraltar's egaming companies have been preparing for Brexit and whether this protracted divorce has eroded the tier-one remote gaming hub's standing

By Julian Rogers

Ninety-six percent. That's the overwhelming proportion of Gibraltar that chose to remain in the EU when the population cast their vote in the UK referendum in June 2016. Unfortunately for most Gibraltarians though, 52% of the overall UK population opted to leave. Yet almost three-and-a-half years on, and with the UK's parliament almost as divided as the nation over Brexit and Britain's departure, the electorate will head to the polls in another General Election on 12 December in a bid to break the political deadlock.

Meanwhile, two Brexit deadlines – the original leaving date of 31 March and the six-month extension of 31 October – have been and gone, replaced by a new extension of Article 50 until 31 January. Even at this stage it is far from clear what will be the outcome of the election, or whether the UK will end up leaving the EU with a deal after a transition period, crash out without one, or if there will be a second referendum over Brexit.

This whole sorry mess has probably left many in the British Overseas Territory shaking their heads in dismay. "Obviously the uncertainty is not good for anybody. It's not good for Gibraltar, the UK or the rest of Europe," says Peter Montegriffo, partner at Gibraltar law firm Hassans. Indeed, Gibraltar's chief minister, Fabian Picardo, told *El País* in September that London and Brussels were playing a poker game and that "gambling with people's lives is not what the voters elected me to do".

With the UK now due to leave on 31 January and the transition period, if a withdrawal agreement is agreed, set to run until the end of 2020, there are fears the short timeframe to hammer out Britain's future trading relationship with the EU ramps up the chances of a no-deal. This situation will cause some degree of anxiety for businesses and workers on the Rock where there are currently 30 licensed online gambling companies (15 B2C and 15 B2B) with either headquarters or operations there.

These firms include the likes of GVC Holdings, William Hill, Betfred and 888 Holdings, while Gibraltar-headquartered BetVictor recently marked its 20th anniversary on this 2.6 square-mile jurisdiction south of the Iberian Peninsula. However, Nigel Birrell, CEO of Gibraltar-based secondary lottery operator Lottoland, says that once staff got over the initial shock of the referendum result,



things returned to normal. “They were all concerned in the immediate few days after the vote. I was in the UK and I had to fly back to reassure them that it was business as usual, but once everyone got over the first couple of days, everyone was reasonably happy.”

Just a short stroll from Lottoland’s offices is the headquarters of Addison Global, the operator behind the MoPlay brand. Here, chief strategy officer Nyreen Llamas acknowledges Brexit “poses planning issues” as the company’s products have yet to be rolled out in numerous EU markets, though Britain’s departure isn’t an “existential threat to our raison d’être”.

She adds: “This industry is very used to challenges from a licensing and regulatory perspective. It is a highly adaptive industry, always learning and incorporating new ways of providing services and has, in my view, very sophisticated players leading their respective businesses to handle these challenges. In an EU environment where there is no pan-European harmonisation of licensing and regulatory regimes for this sector, and where businesses hold country licences, Brexit will not be the insurmountable challenge it poses for other sectors like the travel and food industries.”

*In an EU environment where there is no pan-European harmonisation of licensing and regulatory regimes for this sector, and where businesses hold country licences, Brexit will not be the insurmountable challenge it poses for other sectors like the travel and food industries*

**Nyreen Llamas | MoPlay – Addison Global**

#### **Papers, please**

Gibraltar isn’t part of the EU’s customs union, so there are checks on goods crossing the border. It also isn’t part of the Schengen Area, which means passports are supposed to be scrutinised. Yet, most workers commuting every day from Spain hardly break stride these days and passport control staff barely glance at passports. The fear, of course, is that a no-deal Brexit could lead to long queues and delays at the frontier, at least for a while after the UK’s departure. That scenario would cause chaos for egaming companies and for those staff travelling back and forth from Spain. Around 3,500 people are employed in gaming on the Rock, up from 1,900 a decade ago.

According to the Gibraltar government, there were 14,740 people who live in Spain and work in

Gibraltar as of March 2019. That’s around 50% of Gibraltar’s labour market. Of those employed on the Rock, more than 9,000 were Spanish nationals and in excess of 2,300 were British citizens. For Lottoland, around three-quarters of its 250 staff live in Spain and travel daily to and from the operator’s office in Marina Bay via Winston Churchill Avenue. “If there was no deal and you needed to get a visa, that would be a problem,” says Birrell. He adds: “I think the government is very aware of the key issue and they will do what they can with their Spanish counterparts to make sure there isn’t an issue. But who knows, we might wake up [in a no-deal situation] with two-hour queues.”

But with Gibraltar accounting for an estimated 25% of the GDP for the neighbouring region of Campo de Gibraltar in Spain, intentionally orchestrating delays at the border would appear to be a short-sighted strategy. Llamas says: “The authorities on both sides of the border, particularly those in the direct neighbouring areas in Spain, have no interests whatsoever in making the border crossing difficult.” This could change, though, if the left-of-centre Spanish government is supplanted by politicians on the opposite side of the political spectrum. “If the right-wing guys get in, they might become more aggressive towards Gibraltar, and one way of trying to starve or squeeze the blood out of Gibraltar is to restrict the border. Doing that, they would be cutting off their own nose to spite their face,” Birrell explains.

#### **Contingency planning**

Since the referendum, egaming companies with operations in Gibraltar have been making arrangements to prepare for the British Overseas Territory eventually being outside the EU. For instance, Gibraltar-based 888 has obtained a Malta gaming licence and established a server farm in Ireland to serve EU markets without disruption to its business. Likewise, GVC has relocated some servers to Dublin and plans to use its Malta licence to accept EU players from certain member states. William Hill, on the other hand, has used its £242m acquisition of Mr Green and its Malta operations to neatly still gain access to EU markets after Brexit, leaving William Hill’s Gibraltar office as its UK-facing hub.

On the whole, though, Gibraltar’s online gaming sector has carried on without too much upheaval. That is apart from the bombshell this summer that bet365 was to move hundreds of its workforce from its Waterport Place office to Malta. The UK-founded online giant cited Brexit as a reason behind the

decision. Andrew Lyman, head of Gibraltar's gambling regulatory authority, says bet365 has reduced its headcount on the Rock from around 500 to approximately 100, although he insists "substantive operations" will remain. So, how hard did the government try to persuade bet365 not to move a critical mass of its workforce to Malta? "We attempted to persuade them to leave a greater percentage here," he responds.

"Plainly, it was disappointing that they decided they would move more of a percentage of their business to Malta than we thought was necessary, but we respect that they are entitled to make a strategic decision. We don't necessarily think that that strategic decision was the right one in its entirety, [but] we respect that they have got to maintain EU access." While the downsizing is a blow for Gibraltar, Lyman believes all the licensed egaming companies are committed to the Rock and that if a mass-departure was going to take place, it would have happened by now.

In fact, the regulatory authority has granted a slew of licences since the referendum, including to SBTech-powered sportsbook Virgin Bet a few months ago. "To my understanding, most operators have previously made necessary structural changes to be prepared for issues that can arise from Brexit, and this has not led to an exodus," says Peter Howitt, managing director of the Gibraltar office for law firm Ince. Despite the uncertainty around Brexit and despite Lottoland securing B2C and B2B Maltese licences in March, Birrell is adamant Lottoland will stay in Gibraltar as it is where the company was "born [in 2013] and grew up".

Addison Global's Llamas also insists the operator is "fully committed" to Gibraltar. "We set this business up post-Brexit vote, with a focus on growing an international business from Gibraltar, and Brexit does not pose a major obstacle to these original plans." Following bet365's intentions to scale back its presence, companies like Lottoland and BetVictor went on a hiring spree. Meanwhile, GVC, which employs around 300 staff at its office on Europort Avenue, is currently advertising for a number of roles, while William Hill has more than 20 vacancies in Gibraltar spanning marketing and CRM to cloud engineering and data science.

#### **Making alternative arrangements**

Bet365's decision to move staff and grow its operations hub in Malta was a feather in the cap for the Malta Gaming Authority, even if uncontrollable circumstances forced bet365's hand. Malta, an EU

member state since 2004, naturally welcomed the operator's announcement with open arms. Prime Minister Joseph Muscat crowed in a tweet about the company's "significant expansion" of its Malta operations and how "its footprint will now double that originally envisaged". It's been reported that bet365's enlargement on the Mediterranean island is costing €70m.

For Malta, Brexit has been an opportunity to capitalise on those operators seeking a dotcom licence to serve those EU countries without egaming regulations. And who could blame them? "Malta is keeping an eye on changes that may unfold in Gibraltar, which is one of the country's competitors in the online gaming industry," says Iosif Galea, a Malta-based regulatory compliance specialist and gambling consultant. "Gibraltar's gaming hub might experience serious strains if the Spanish government continues with its plan to put stricter controls at the borders upon Brexit, especially when keeping in mind that the majority of Gibraltar's gaming companies are run by employees who cross the border daily."

However, Gibraltar could also be facing a new emerging threat from an egaming jurisdiction much closer to home. Just across the Strait of Gibraltar on the northern shores of Morocco lies the autonomous Spanish enclave of Ceuta. The seven square-mile tax haven has stated its intentions to exploit the impacts of Brexit on Gibraltar. Ceuta, which uses the euro, imposes a gambling tax of 10% on net profits for companies based in the city. That's half the rate of mainland Spain. Besides VAT, income and wealth tax breaks, Ceuta's corporate tax is pegged at 7.5% for the first two years and 12.5% thereafter.

A handful of companies have recently either planted their flags in Ceuta or announced plans to do so. For example, Betfred has established a new office there to serve the Spanish market after recently securing a gaming licence from Spain's regulator, the DGOJ. In addition, 888 CEO Itai Pazner told *EGR* in September that the operator plans to create an office in Ceuta next year as a way of reducing its tax burden in Spain, 888's largest market after the UK. Yet, Lyman stresses that press reports have overblown the significance of these operational hubs being established in Ceuta.

"The Spanish media have slightly misrepresented this idea that there is a flood of companies moving out of Gibraltar to Ceuta," he says. "They have gone to Ceuta because they would have had to establish something in Spain anyway. And by es-



## Rock solid

**Jay Dossetter, head of CSR and corporate communication at London-listed GVC Holdings, discusses the effects of Brexit**

**EGR Intel: More than three years on from the referendum, how do you see Brexit impacting GVC's operations in Gibraltar, and is GVC committed to the British Overseas Territory?**

Jay Dossetter (JD): We don't anticipate that Brexit will have any material impact on the business. GVC remains committed to Gibraltar as the operational hub of our online operations, and we do not foresee that changing regardless of the ultimate settlement the UK reaches with the EU.

**EGR Intel: How has GVC been planning for the UK and Gibraltar's eventual departure from the EU?**

JD: As disclosed in our interim

results announcement, ahead of the previously stated departure date of 31 October, we have registered part of the online business under a Maltese online gambling licence in order to meet EU regulations. In accordance with the requirements of some states that companies operating online gambling services in those countries locate their servers within the EU, some of the group's servers were transferred to Dublin in June 2019.

**EGR Intel: How concerned are you by the possibility of long queues at the border if the UK crashes out without a deal?**

JD: Again, we don't anticipate any material impact on the business. In the event of any temporary disruption at the border, then we have flexibility for staff to work remotely and carry out their duties as usual.

establishing it in Ceuta, they have actually reduced the costs of establishing in the Spanish market. So it isn't, in the truest sense, a rival to Gibraltar. I don't want to run it down but there are things I lay awake at night worrying about, and Ceuta isn't one of them."

### Ticking all the boxes

In order to further its appeal as a gambling jurisdiction and stay competitive, Gibraltar slashed taxes for gambling companies from 1% to just 0.15% last year. Combine this with a robust regulatory regime, as well as no capital taxes, no wealth taxes, no VAT and an average of 300 days of sunshine a year, and the Rock still has a lot going for it. The jurisdiction is also updating its regulations around IT, with Lyman revealing that they have had to be flexible of late with gaming companies regarding IT infrastructure arrangements. Indeed, an anonymous gaming executive previously told EGR that bet365's move was partly driven by its disagreement with the government over the use of cloud-based servers.

While Lyman describes the relationship with bet365 as "convivial", more broadly he concedes the prospect of Brexit has inevitably harmed Gibraltar as a tier-one egaming hub. "The fact that Brexit has been rolling on for three years and there is the possibility of a hard Brexit, I think this has reduced to a degree the level of confidence in the jurisdiction, naturally. Nobody is confident, whether they are in Gibraltar or the UK, about what the future brings. It is a lack of confidence driven by uncertainty more than anything else. That has caused gaming companies to look at how they need to structure [themselves] in order to continue to access the EU markets."

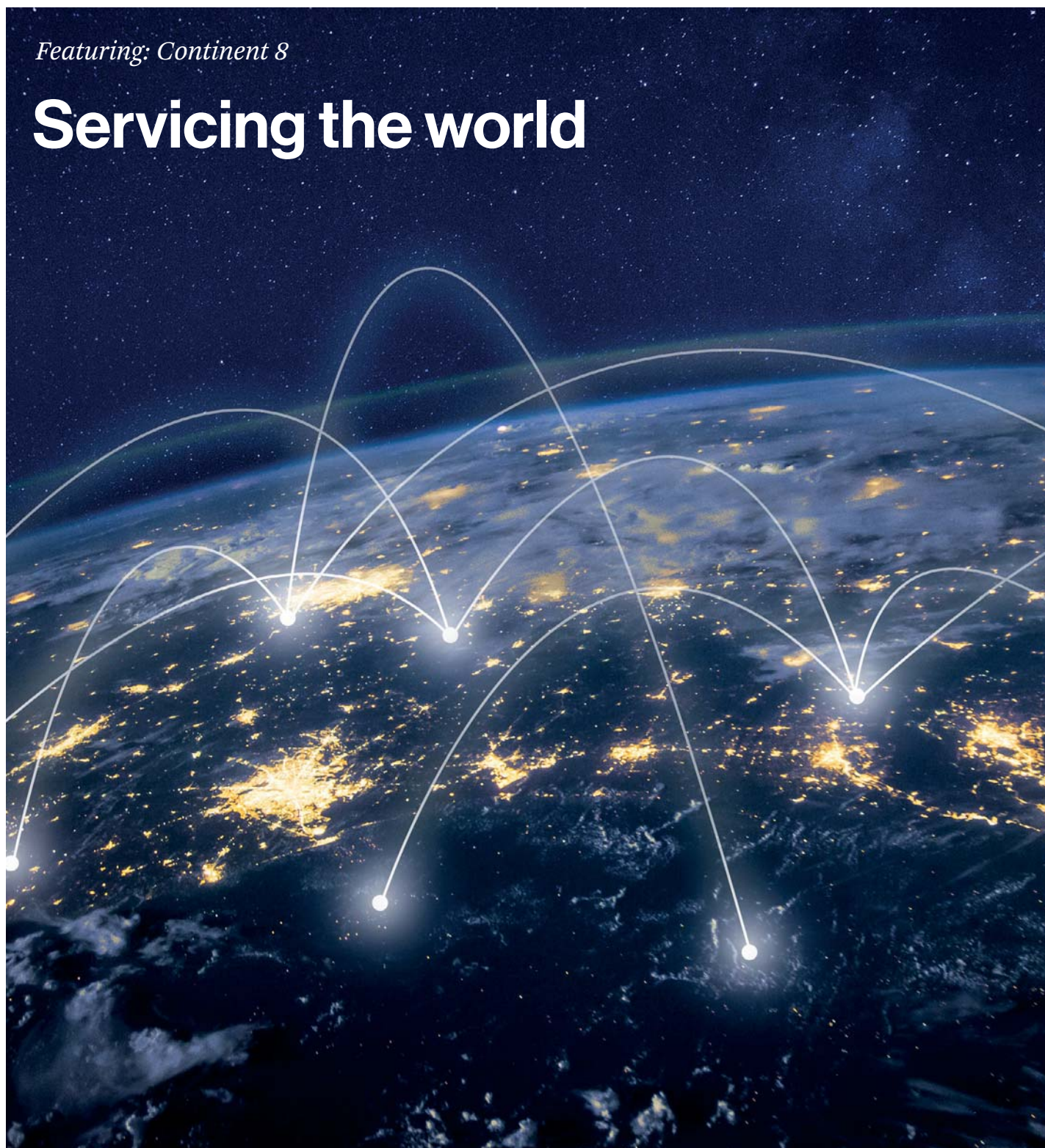
In the meantime, no one can say for sure what will happen regarding Brexit, such is the fluid nature of the situation. Operation Yellowhammer – the British government's document spelling out the potential consequences of a no-deal Brexit – suggested Gibraltar could face shortages of food and medicine. On top of this, significant delays of up to four hours on the border with Spain could last "at least a few months" in the event of no-deal. The Gibraltar government insists that this document is outdated and plans are in place to cope with a hard Brexit.

For Addison Global, Llamas says the operator has no regrets about basing itself on the Rock after the referendum. "Our growth and expansion since set-up and then launch has shown we were correct in making Gibraltar our home from a headquarters perspective. Gibraltar's authorities also play a considerable part in our choice of anchoring ourselves locally. They have been firm but approachable at all times, and Gibraltar has positioned itself at the forefront of regulating this industry and supporting it. If anything, the threat of Brexit has shown the authorities to be even more supportive of the online gaming sector."

When the UK introduced a 15% PoC tax a few years ago, Gibraltar's viability as a gaming hub was questioned. Ultimately, the doubters were proved wrong. And while a hard Brexit is being touted as a possible doomsday scenario for Gibraltar, at least in the short term, it could end up meaning operators only licensed in Malta are not able to accept UK players. Either way, Gibraltar seems set to remain a premier egaming hub. Lyman says: "To use an old [ex-William Hill boss] Ralph Topping expression, 'There are a lot of naysayers who try to run Gibraltar down'. To date, those naysayers haven't been right." ♦

*Featuring: Continent 8*

# Servicing the world







Continent 8 looks at some of the unique challenges and nuances associated with operating and providing services across the online global gambling world

**H**istorians may well look back on 23 June 2016 as a day that redefined British politics. Since that momentous day over three years ago, we have seen three prime ministers and a general election. This hardly tells the full story of the roller coaster of events spanning those three years. The terms 'backstop' and 'hard/soft Brexit' have become a recognised part of British political vocabulary.

Indeed, the forthcoming UK general election on 12 December potentially represents Brexit as the national question at this time. Time to deal or no deal.

While the Irish border may continue to be an unresolved Brexit issue, another European border was central to the minds of many in the gaming community; Gibraltar and Spain. Of course, Gibraltarians voted overwhelmingly in favour of remain and the ramifications for democratic rights of minorities may indeed be a challenging topic for political scientists in years to come. Pressing commercial questions were posed. Would staff be able to cross the frontier? Would operators have access to European markets? What about the UK? Dilemmas such as how to structure in uncertainty and plan for market access saw a number of scenarios invoked and, in some cases, rolled out. Time will indeed tell any positive or negative impact to Gibraltar, but it is clear the entrepreneurial tendencies and the enviable community loyalty Gibraltar enjoys will continue to be the strongest asset for the Rock.

Malta, of course, does not stand immune from the opportunities and threats Brexit poses as diverse business and technical approaches to the issue come through. Nonetheless, the licensing liquidity in Malta continues at pace with a blend of large enterprise licensees along with start-ups with new technical and business models. Continent 8 has witnessed significant demand from both large co-location customers and from entrepreneurs for the 'Start-Up Cloud'. Various technical solutions and associated investment continue to be made in Malta by Continent 8 to meet the demand for 'glocal' approaches to match the underlying international aspirations of the jurisdiction.

The continuing trend towards national regulation has also been evident in 2019. Legislative and

licensing developments in Sweden, Greece and the Netherlands, to name but a few, show continuing efforts by nation states to regulate the industry. Progress continues to be made in Ireland following the Gambling Control Bill 2013. There is great potential for the industry in all of this, notably in terms of valuations and balancing the potential risk of diseconomies of scale at the server capital expenditure level being just one of the challenges the industry faces. Continent 8's multiple locations and network presence provides a collaborative approach to defining bespoke solutions for a changing industry. A good example of this is operating disaster recovery under progressive Isle of Man legislation set for the purpose.

Indeed, as the market continues to seek new opportunities, not least in Africa, Continent 8 will continue to work positively with customers to provide best of breed service.

## Asia

The current state of online gaming licensing in Asia is somewhat volatile. Following the cessation of all online gaming licences in Cambodia, the Philippines remains the sole location in Asia where regulation exists that gives any level confidence in a comprehensive structure. Indeed, the Philippines recognises the value and growth the sector brings to GDP with a possibility being that the government will seek to increase tax and fees in the absence of any other emerging industry. For example, this month the House of Representatives' Ways and Means Committee unanimously approved a bill imposing a 5% tax on Philippine Off-shore Gaming Operators (POGOs) based on gross receipts derived from gaming operations. Historically, business process outsourcing (BPO) is the key growth and dominant contributor of taxes and employment in the Philippines. Online gaming is predicted to surpass BPO in 2020 as the main contributor of taxes, employment and property demand. Achieving balance will be crucial for the Philippines in delivering GDP growth through online gambling.

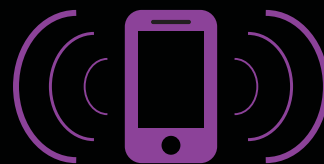
This volatility of licensing in Asia has historically represented opportunity for Asian operators moving to the western world. The opportunity to licence and take advantage of corporate infrastructure in host jurisdictions is a well-trodden path, not to mention the European markets. Equally, opportunity is potentially abundant for western operators moving east. This globalisation of Asia will undoubtedly continue in gaming as it has in many

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other economic sectors. In the coming years it will be interesting to watch the development of M&A activity as this crossover continues with ambition and solid licensing and technical frameworks.

A player market to watch is of course India. While population may be a crude measure of potential economic success, there can be little doubt the sub-continent's size and sophistication will bring a key Asian market for those in Asia and elsewhere. There are many regulatory bridges to cross but the prevalence of internet, together with propensity for consumption of sports, looks like an interesting bet for the gaming market.

### The US – a relentless onslaught

Those of us familiar with the old days of waiting for buses will recall the frustration of waiting forever for your bus before they all come at once. In November 2013, New Jersey went live with online gaming but it was a further five years before the next state, Pennsylvania, regulated. At the same time, and on foot of the repeal of PASPA (May 2018), states were scrambling in order to bring in regulated sports gambling in order to meet start dates for the various leagues and in turn bring in much-needed revenues. Within months, numerous states had enacted legislation allowing some form of sports betting within their state.

At the time of writing, sports betting is regulated in 15 states, there are enabling laws in a further four states and legislation is pending in five more states. As to which states will be next to regulate, it's so difficult to predict and reminds one of the old fairground horse racing games where your horse is jostling along nicely only for another horse to come out of nowhere and win!

However, as the market develops, we are left with a myriad of different models; regulated sports betting or online gambling or both; licensing via casinos or not; land-based or state-wide online; excessive or suitable tax rates and licensing fees. Those hoping for uniformity and predictability in terms of regulatory consistency will be left waiting for a long time. From an industry point of view, it underlines the continuing need for a coordinated approach when it comes to the topic of shaping regulations.

With regard to online casino gambling, it seems to be the forgotten child in all of the fanfare around online sports betting. Evidence is beginning to suggest that this may be a little short-sighted when we begin to look into some of the numbers around this area of the market.

When one thinks of the nuances around the US market, one cannot but notice the predominance of brand deals, not surprising when one looks at the structures around how licences are granted in many states. There has already been a plethora of intriguing partnerships and associations in a relatively short time with all kinds of groups including media companies, casino brands, various sporting leagues, etc. However, it remains to be seen whether the operator brands that we all know and admire in the rest of the world will be as prominent in the US.

### *Continent 8's multiple locations and network presence provides a collaborative approach to defining bespoke solutions for a changing industry*

For the future in the US, expect a continuing relentless onslaught as more states enable online sports betting and hopefully online casino gambling. Continent 8 has committed to opening up in each market as it regulates across the US.

### Latin America

With a population base of almost 650 million, Latin America remains one of the major untapped markets when it comes to regulated online gambling. However, after a number of years of inertia it appears that there is genuine movement and enthusiasm afoot. Colombia was first out of the blocks when opening up the regulated online market in 2017. Other heavyweights in this market include countries such as Argentina and Brazil and there are genuine signs and actions that these markets, along with others, will move to a regulated environment in the near future. In conjunction with this, Continent 8 is in the process of establishing operations in Colombia, Mexico and other markets. ♦

### About Continent 8

Continent 8 Technologies is an award-winning, multi-jurisdictional global cloud infrastructure solutions provider for online gaming, sports betting, and esports. Continent 8 keeps gaming operators' applications online and secure via a private redundant global backbone and 50 connected locations across Europe, Asia, and the Americas. Our advanced datacentres and high-quality networks provide gaming operators with reliability, connectivity, security, and compliance, regardless of geography.





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Featuring: *Government of Gibraltar*

# The strong Rock



## Andrew Lyman

◆ Lawyer  
◆ Government of Gibraltar

Andrew Lyman is a UK qualified regulatory lawyer (also possessing a Professional Certificate of Competence in Gibraltar Law) with a mixture of both public and private sector experience. Following a 20-year career as a customs investigator, Lyman worked for both PwC and the FSA (now FCA) before being appointed as director of monitoring and Enforcement at the UK Gambling Commission. After a decade in the gambling industry in senior regulatory roles, he was appointed as executive director of the Gibraltar Gambling Division in January 2018.

Andrew Lyman of the government of Gibraltar assesses the current state of the domicile and the flexible regulatory approach which fosters an environment of innovation

**D**espite the uncertainties and the need for contingency planning driven by Brexit, Gibraltar continues to sustain and prosper as a tier-one gambling hub; retaining all of its existing operators and attracting new B2C and B2B business.

One cannot underestimate the persuasive power in being able to conduct business in a stable political environment and as part of a diverse and inclusive society, where all the structures of the jurisdiction have a strong and recognised commitment to the rule of law. The current government were re-elected for their third consecutive term in October 2019 with over 50% of the vote.

Gibraltar has also witnessed considerable M&A activity which has caused a reduction in the number of issued licences, but larger consolidated groups, having gone through a supportive change of control process, seem more than happy to remain on the Rock.

There is still a vibrant feel around the Gibraltar gambling industry and a pool of talent for recruitment purposes. Also, importantly, there is an established infrastructure to support staff and family relocation. Separately from regulation, Gibraltar has devoted resources to helping companies and their employees settle in the jurisdiction.

Neither the point of consumption tax in the UK, nor the emergence of open licence regimes in other EU jurisdictions has undermined the importance of Gibraltar as a remote gambling hub. It is also expected that, in due course, the historical growth in industry employee numbers will resume as recruitment and operational issues are experienced in other jurisdictions.

Gibraltar continues to retain significant advantages for operators in terms of location, guaranteed UK access and a supportive business and regulatory framework. Border fluidity is a constant discussion point, but with protocols in place and the economic importance of Gibraltar to the surrounding Spanish region, it is unlikely that there will be more than sporadic and surmountable spikes of disruption. This has always been the case and, at the time of writing, it appears that an orderly transition period is now more likely with the prospect of a 'hard' Brexit declining. Although even that statement feels like creating a hostage to fortune!

*Rather than leave operators with a binary decision to stay or to go, the existing legislation has provided sufficient flexibility for the regulator to apply discretion regarding the location of technology*

**Andrew Lyman** | Government of Gibraltar

Gibraltar's current legislative regime is primarily based around location of technology and even if Brexit had not occurred then there would have been a need to update Gibraltar's legislative and regulatory approach to online gambling.

Rather than leave operators with a binary decision to stay or to go, the existing legislation has provided sufficient flexibility for the regulator to apply discretion regarding the location of technology.

The Gibraltar Government is committed, by the middle of 2020, to updating the Gambling Act 2005 and is about to embark on a legislative and regulatory reform programme which will aim to support the sustainability of the jurisdiction as a key remote gambling location. This reform programme will encompass widespread industry consultation and Gibraltar is receptive to industry input; as long



as that input balances both commercial and regulatory objectives.

For operators, the key issue will be what sort of licences will be issued, the process for application and renewal and the costs of licensing and regulation. However there are other proposed changes regarding the governance framework and powers of the regulator; in terms of a proportionate and flexible enforcement regime in line with international regulatory best practice.

Having substance in Gibraltar will still be a requirement, but the definition of substance is likely to be widened to include 'mind and management' and wider economic contribution; with the jurisdiction, subject to considerations around control and processing of data, being more flexible on the question of IT architecture; including cloud infrastructure.

The reputation of the jurisdiction will remain paramount, but in a post-Brexit environment, Gibraltar is looking at how it can support operators wishing to enter new and emerging non-EU international markets. While it is appreciated that EU markets remain important for operators, Gibraltar understands that the regulatory challenge in those markets means more jurisdictional diversification is necessary to support continued growth.

The main policy objectives are to maintain the main critical mass of B2C operators in Gibraltar while also encouraging new business from a wider group of market participants. Gibraltar has demonstrated by the implementation of a new regulatory regime for distributed ledger technology that it has the risk appetite to accommodate new technologies and business change, safely.

While other jurisdictions have dabbled in the DLT and crypto space (and claimed to be a leading jurisdiction in this area), Gibraltar has quietly got

on with implementing a new regulatory regime on which it is cutting its teeth with live licensees. One of the key issues here is anti-money laundering compliance and how operators can harness regulatory technology, such as chain analysis, to manage regulatory risk.

Maintaining reputation will still mean operating a selective licensing regime with the right level of regulation, but there is now more appetite for start-up business and applications from other jurisdictions will be considered on a risk assessed basis. However, that still means applicants meeting exacting due diligence standards and committing to best regulatory principles.

Gibraltar remains the only jurisdiction with guaranteed UK access post Brexit and with a risk appetite for non-EU international business and a track record of attracting inwards investment, one can see a recovering confidence in the jurisdiction. The recently announced Double Tax Agreement with the UK will further strengthen and harness the relationship.

There was a time when gambling businesses outside the 'blue-chip' circle dismissed Gibraltar as a destination as it was considered too hard to get a licence. However, without compromising standards, Gibraltar has now made it clear that it wants to support expansion into international growth gambling markets where there is a clear business case to do so from those who can clearly evidence the legitimacy of their investment, their commitment to the jurisdiction and their own fitness and propriety. The door will only remain closed to those who cannot prove out their track record and their ability to comply with the standards we seek to set.

Gibraltar is definitely open for remote gambling business. ♦

Featuring: *Rockolo*

# Heading to the cloud



Danny Hook  
♦ Managing director  
♦ Rockolo

Danny Hook is managing director of Rockolo, part of the Gibtelecom group. Hook has over 20 years of experience within the IT sector, both as an IT engineer and more recently, over the past decade, leading operational teams and managing the data centre business for Gibtelecom.

Danny Hook of Rockolo identifies the importance of the cloud

**2**019 has been a significant year of growth within the egaming market for Gibraltar and a key technology enabler to this has been the local cloud.

Back in July 2017, Rockolo brought to market its first in-jurisdiction cloud platform built for the needs of the licensed egaming community of Gibraltar. After an initially cautious reception from the industry in its first 12 months, 2019 has seen a surge in demand for this flexible platform.

So, what trends have we seen emerge in Gibraltar's cloud adoption?

## Trend 1 - Demand across all three industry sectors

- B2C Operators
- B2B games providers
- Sheltered B2B providers

B2C Operators are the most demanding of clients and Rockolo has built up many years of experience servicing their needs through its traditional datacentre hosting business on the Rock. Several operators have fully deployed into Rockolo Cloud and made it their technology hosting home for the Gibraltar elements of their business. In some cases, operators have moved completely out of existing physical deployments in Gibraltar and moved across to Rockolo Cloud, such is their confidence and desire for an agile and flexible platform.

B2B games providers break down into two main groups and form a large part of the egaming ecosystem in Gibraltar.

The first group are a number of larger long-established providers who serve the operators in many jurisdictions and have been deployed in traditional co-location hosting for many years. This group is slowly coming around to the concept of not continuing to own and have full physical control over

its deployed technology. M&A activity increasingly brings these businesses into contact with the cloud deployments they inherited through acquisitions, creating change and understanding from the inside.

The second group are the challengers and innovators. They are typically younger, more energetic companies who have never had deployments in their own physical compute environments. They fully embrace the concept of 'pay-as-you-use' technology platforms from the outset and as such are free from heavy CAPEX requirements that can anchor them in one place for long periods. They

*Rockolo Cloud forms the 'in-jurisdiction' element of our client's deployments without compromising connectivity, performance or scalability options*

Danny Hook | Rockolo

are agile and cloud (from many vendors across the world) enables them to deploy with speed then scale their costs and infrastructure on-demand when they win new integration deals.

We've seen strong demand for Gibraltar cloud infrastructure from this second group. One new client even told us that the emergence of a cloud platform in Gibraltar was the final piece of the jigsaw they needed for their venture into Gibraltar to commence!

Sheltered B2B providers are game developers and providers that don't hold a Gibraltar licence themselves perhaps because they're too small or they want to initiate a first venture into Gibraltar to see how business works out for them.

This group will buddy up with licensed B2B providers specialising in managing this community. They typically facilitate introductions to the big operators who will ultimately consume their product.



There has been incredible interest and uptake in Gibraltar Cloud from this sector of the market. In part this comes down to the very flexible commercial model that doesn't tie tenants into long contracts thereby allowing them to speculate in the territory. The second reason is more technical in that Rockolo Cloud sits within the same datacentres as many of the physically deployed operators. This makes for very robust connections and keeps network latency to an absolute minimum, creating the best user experience possible.

#### Trend 2 – deployment models – public, private, hybrid and multi-cloud

Rockolo Cloud is relevant in all four deployment scenarios and various tenants have chosen to deploy in each of the models.

Public Cloud is our standard and most popular offering. It offers the most flexible pricing with no long-term commitments thereby letting businesses get in and out quickly. All tenants' resources and data are securely separated from each other and our cloud technology physically layers them onto shared compute, storage and networking resources.

Hybrid Cloud describes a mixed environment of traditional physical hosting combined with cloud as a flexible extension to existing infrastructure. We've seen several operators take steps into cloud using this approach by cross-connecting across our datacentres with private links. Operators can adopt a model of delivering their base load from owned infrastructure then 'burst' into cloud for peak demand such as major sporting events and only pay for the times they use it.

Private Cloud is where a tenant elects to have specific hardware resources dedicated to its deployment. This has tended to be more attractive to operators

and longer term tenants. This model reduces charges through longer term contracts and gives greater performance assurance knowing no other tenant is utilising and contending for their resources. We've found that clients tend to start their cloud journey in the Public Cloud then migrate over time to Private as they grow and better understand their own needs and look to optimise costs over the longer term.

Multi-Cloud is a powerful combination of either Public, Private or Hybrid in combination with other vendors clouds from around the world. So what's the key to successful Multi-Cloud deployment? Networking!

The success of any cloud point-of-presence (PoP) is its ability to connect well with multiple other clouds from all the major providers such as Amazon AWS, Microsoft Azure, Google GCP, and IBM.

Almost without exception nearly all current Rockolo Cloud tenants interconnect their deployment with one or more of the major hyperscale cloud providers thereby integrating their Gibraltar deployment into a wider global strategy.

Access to quality networking is key to Multi-Cloud success. That's why we're built on the solid foundations of the Europe India Gateway (EIG), a subsea cable network provided by parent company Gbtelecom.

With direct access to this core backbone stretching from London to Mumbai and onwards through global partners, Rockolo Cloud forms the 'in-jurisdiction' element of our client's deployments without compromising connectivity, performance or scalability options.

2019 has been a pivotal year in technology options for Gibraltar's gaming community and Rockolo Cloud has firmly positioned itself front and centre of the revolution. ♦

Featuring: *SMP Partners*

# The year-round compliance service – Compliance 365



**Matthew Robins**

◆ Director  
◆ SMP Partners

Matthew Robins is a director of SMP egaming and responsible for licensing, risk and compliance services. He has 20+ years' experience in compliance, audit, and regulations, including many years within the gaming industry.



**Tom Collister**

◆ Senior regulatory compliance  
◆ SMP Partners

Tom Collister is a senior regulatory compliance officer in the SMP egaming team. He has a comprehensive understanding of UK gambling regulations and experience of customer onboarding, risk profiling, and problem gambling obligations.

Matthew Robins and Tom Collister of SMP Partners discuss their Compliance 365 product and how it makes life easier for their operators

**EGR Intel (EGR):** What was the genesis of your Compliance 365 product?

**Matthew Robins (MR):** SMP egaming has been around for about 10 years and has guided many clients with the likes of regulatory compliance and obtaining licences in various jurisdictions. Over the last year, there was increasing demand for people to come and help review whether clients had sufficiently implemented the processes in their back-end and accounted, at a customer level, for controls around money-laundering, responsible gaming, and other areas in which they have to comply with.

We also started to understand from compliance staff in the operators that being part of the operator themselves, they were busy ensuring everything was being done correctly while assisting the objectives of the company and didn't necessarily have the time to focus on all of the other exterior requirements.

Recently, there has been a considerable number of fines and sanctions imposed, especially from the UK gambling commission, and we had found ourselves working with a large number of clients to help rectify those issues and help produce ongoing plans to help them ensure they had everything in place that would satisfy the regulator on an ongoing basis. During such conversations, it struck us that a bit more scope was there to provide some form of continual assurance for operators who may not have the time or resources to do this themselves. It became evident to us that the cycle of compliance is making sure that not only do they have the right policies and oversight in place, but also to ensure staff are trained and educated so that these procedures and processes are understood and oper-

ating effectively. Compliance needs to be monitored on an ongoing basis and someone needs to ensure that what has originally been stated to the regulator by giving them the policy, is actually being done on the ground.

We expected that this was likely quite difficult for a vast majority of operators and that it would potentially prove costly to, for example, enlist people to look after the AML programme, the training and awareness programme, ongoing monitoring of transactional activity for both AML and problem gambling and ensuring appropriate strategies and

*If discrepancies are found through the use of Compliance 365, we work with our clients on anything we consider to be in poor health, and we then create a treatment plan*

**Matthew Robins | SMP Partners**

initiatives were in place. With all this in mind, we decided that offering something as a monthly subscription would give that ongoing assurance to the boards within those operators on a regular basis, and we could then provide what we call 'health checks' on a risk approach. The idea here was that we could potentially carry out, for example, up to four health checks per year which would look at how our clients were doing in regard to different topics. We might perform an anti-money laundering health check on a quarterly basis, for instance, or we might perform a responsible gaming health check depending on a client's needs. The health checks help show how our clients monitor and keep on top of their obligations. In this way, we figured we would be able to function as an extension of our clients' compliance team.

In this way, our clients can come to us and bounce off ideas if they need to change things, or



we can act as a sounding board to them for routine regulatory queries and advice. Essentially, we believed that Compliance 365 would be an effective way for our clients to receive ongoing guidance and assurances that they were in good health with reporting from an independent source to help satisfy regulators, boards and shareholders. It would also prove a far more cost-effective way than trying to recruit people to carry out such functions on an individual basis. Clients would benefit from our expertise and resources, and also be able to demonstrate to any regulator that they were on top of their regulatory responsibilities and on an ongoing basis have scrutiny and oversight of their key compliance risks.

**EGR:** How do health checks work?

**Tom Collister (TC):** We tailor each health check to focus on a particular risk area, and we create a framework which we will then review against our clients' policies. The key is to ensure clients are fulfilling to the regulator that everything they said they would do within their policies is actually being done. We do this by looking for evidence of how our clients put their policies into practice.

**MR:** For example, we sample our clients' players' accounts, look at customer interactions, whether a risk profile analysis has been conducted on their customer base from an AML perspective, and we make sure staff have been trained. We also provide this training function through our compliance academy, which forms part of our inclusive Compliance 365 subscription. This includes AML training and responsible gambling to ensure staff are up-to-speed, and we manage this process to make sure the content aligns with the current regulations.

If discrepancies are found through the use of Compliance 365, we work with our clients on anything we consider to be in poor health, and we then create a treatment plan and help our clients to implement that and advise on an ongoing basis around what they need to do to put any further changes in place. We then assess the changes made by testing at a later date which is the beauty of the subscription model where, as it's ongoing, we can easily come back in and test the effectiveness of any changes previously implemented to make things better. This all results in a continuous loop in terms of making sure the operator understands what needs to be done. They get trained on their policies and procedures which meets how they operate internally, and they then receive these routine health



checks on key risk areas of the regulations, agreed with them to make sure they are comfortable and have adequate assurances, that things are working as they should. Ultimately, the whole idea is that by doing all this for value for money, it should keep the regulators, the executives and board of the operator happy, and more importantly reduce any risks of incurring large fines by inadvertently breaching regulations.

**EGR:** How does the process of inducting clients into the Compliance 365 model work?

**MR:** When someone signs up for a subscription with us now, depending on the jurisdiction in which they were licensed, we review what policies and procedures they may already have in place against the regulatory requirements, and essentially perform a gap analysis. The idea behind this is to ensure the policies and procedures match what the operator does, so rather than getting a policy 'off the shelf', it makes the process very bespoke. In this way, the procedures are easier to adapt, and the training individuals have is also tailored to the system in which they operate. This leads to our understanding of whether an individual's framework is fit for purpose and helps us design and agree the supporting work for the client through Compliance 365, not only to provide assurance for the client but ongoing advice, guidance and support throughout. ♦

Featuring: *SMP Partners*



Featuring: *Digital Isle of Man*

# Looking ahead – egaming on the Isle of Man



## Lyle Wraxall

◆ CEO

◆ Digital Isle of Man

Lyle Wraxall is the chief executive of Digital Isle of Man, the government executive agency responsible for nurturing growth, innovation, and excellence in the island's digital sector. Wraxall is a highly experienced management and technology consultant who has worked across the digital and fintech space. Most recently, he was head of the New York office for Pcubed, a significant international management consultancy practice with offices around the world.

Lyle Wraxall, CEO of Digital Isle of Man, gives his views on the evolving world of egaming and how the Isle of Man will maintain its reputation as a global egaming hub in 2020 and beyond

Home to countless international egaming businesses and seeking to adapt and evolve within the sector, the Isle of Man continues to reflect the global gaming picture. Long gone are the '90s when everything was new and innovation came naturally; today's mature, competitive and highly regulated market is distinctly different. That's not to say innovation and growth isn't possible. In fact, it remains the goal of most businesses to differentiate themselves, remain relevant and increase revenue. But it is more challenging to do so than ever. Our strategy as a jurisdiction is therefore to accommodate this business evolution, and to create a diverse, agile and efficient environment for businesses to thrive and expand. In this article, I'll explore how the Isle of Man's approach is adapting to better support a maturing sector, the emerging technology that will facilitate innovation, and also explain how diversification within the industry will help to maintain our position as a leading destination for businesses. Tackling the changing 'shape' of growth, emphasising the significance of relationships between governments and industry, and the benefits of a clear and unified proposition, I'll outline the Isle of Man's outlook for the future.

As with all technology-based sectors, everything happens faster than traditional institutions such as finance, law and manufacturing, and the world of egaming is no different. It is worth remembering that mobile betting was only introduced a few months before the 2010 World Cup in South Africa, yet within just nine years, it is now believed to be an industry worth an estimated \$68.5bn. While it is easy to forget, this underlines how much has

changed since the inception of gaming. The Isle of Man began building its reputation when businesses were starting, barriers to entry were low and consumers were enjoying the novelty of digital entertainment, but we have also always managed to adapt and react to changing demands and environments. When scalability and growth dictated that companies start merging and acquiring one another and the traditional concept of growth was measured by increases in staff, revenue and market share, the Isle of Man quietly facilitated this. For instance, the PaddyPower and Betfair merger was hosted here and we will certainly look to accommodate plenty of deals in the years ahead. However, business drivers are changing, and as quickly as mobile betting exploded, so too will the next phenomenon. The focus of my role is to now create the perfect environment for this to take place, ensuring our regulators are aligned with new technology and develop new legislation that encourages growth.

*New markets, intense competition and new technologies suggest that it will be these reputable and established firms shaping the future and at the forefront of innovation*

**Lyle Wraxall | Digital Isle of Man**

## Fostering a culture of innovation

Remembering that welcoming new enterprises (large or small) with an array of diverse business models remains crucial, and the need to balance and support established and successful companies that call the Isle of Man home is a growing consideration. New markets, intense competition and new technologies suggest that it will be these reputable and established firms shaping the future and at the forefront of innovation. The challenge now is to help these businesses navigate this changing land-

scape and consolidate the strong egaming sector in our economy. Therefore, it is my job to provide a culture of innovation, an accessible regulatory landscape and an environment that allows these businesses to focus solely on growth. By clearly communicating regulatory changes and building strategic partnerships between government and industry, we will allow organisations to focus on streamlining their overhead costs, refine their strategies and explore how to capitalise on emerging trends.

Blockchain technology, 'big data' and artificial intelligence are just a few examples of a seemingly endless list of advances that could form the egaming picture of the future. However, it is currently unclear how best to implement these; will they update current processes, facilitate completely new concepts or improve the security of data protection? Perhaps all of the above, and I hope to encourage businesses to feel able to innovate and take risks without unnecessary and sudden challenges. The launch of Blockchain Isle of Man in February this year is a good example of just one system being implemented on the island, which is designed to help companies exploit the opportunities blockchain can provide. With a team of expert consultants translating business ideas from firms to regulators to help create agile and thorough legislation, businesses are investing and experimenting with blockchain in a variety of ways. We have even seen token-based companies start to emerge. Coupling this with multiple shared working spaces where ideas can be discussed and the six world-class data-centres situated on our shores, we are always investing in new opportunities and will continue to do so.

### Beyond the tech

Beyond the improvements that new technology affords, there are also opportunities for businesses in completely new fields within the sector. The rise of esports around the planet is an exciting prospect for companies to expand into fresh markets and reach new customers. Not only will this create jobs, boost the economy and cement our position in the sector, it will also inform future regulation and policies for the increasingly diverse technological ecosystem in the Isle of Man. As the world of esports becomes more professional, players are surrounding themselves with bigger teams of staff (creating jobs) and relying more and more on excellent connectivity. The Isle of Man remains a perfect location for this; highly regulated, safe and with secure data storage capabilities and expertise across the areas that esports may eventually lead into.



*Featuring: Digital Isle of Man*

But companies need to understand what we can offer and explaining this proposition to businesses around the world is probably the most exciting part of my job. By combining our heritage and expertise in this space and consolidating relationships between government and industry, we have now established a clear proposition. If you add the guarantee that we will support companies that land here for the entirety of their stay and not just the initial welcome, I'm very positive about the future of the sector. The continued applications for our software supplier licence, multiple applications to Blockchain Isle of Man and the success of pioneering firms such as FunFair landing here, all illustrate the strides we are making.

While the international egaming industry is certainly changing and the demands from business are developing, the Isle of Man remains well-placed to grow and adapt accordingly. Already established as a fast-moving and ambitious jurisdiction, we are committed to accommodating companies at every stage of their journey. However, as global trends lean towards businesses merging and the need for companies to invest, expand and streamline, our strategy is dedicated to creating the perfect ecosystem for this. Our clear proposition, investment into emerging technologies and positive outlook for the growing diversification of the sector means that we are ready for whatever the future throws up. Bring on the next decade! ♦

# SMP COMPLIANCE 365

- Are you having difficulty recruiting experienced compliance staff?
- Do you need help in keeping on top of changes in gaming regulations?
- Do you wish it was easier to demonstrate that you are meeting your licence and regulatory obligations?
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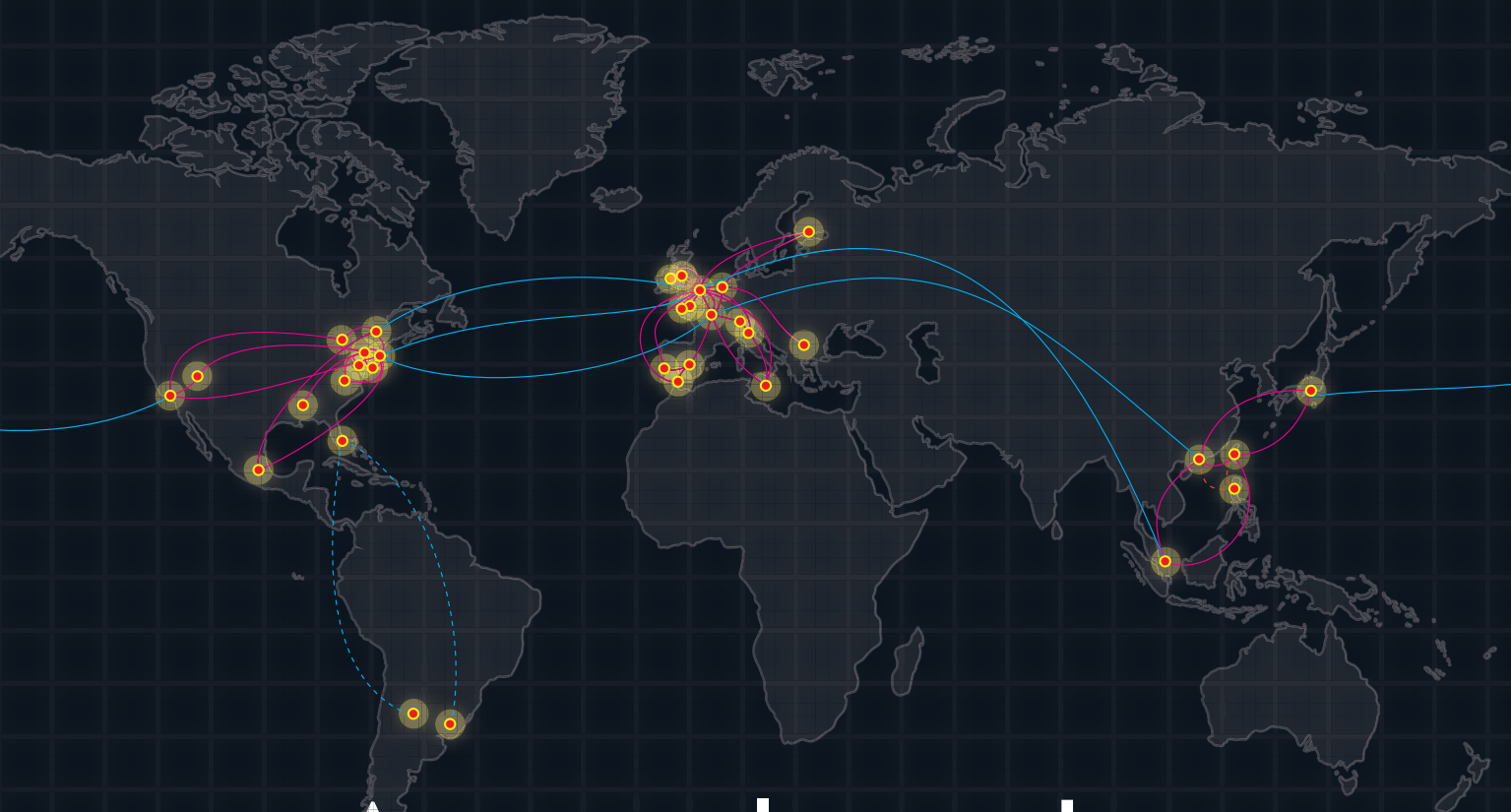
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**For further information, please contact [info@smpegaming.com](mailto:info@smpegaming.com)**





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