

Reports

ESTONIA MARKET





Estonia

Punching above its weight

Following on from our report on Lithuania at the end of last year, we take a look the diverse gaming markets of Estonia, the smallest of the Baltic trio, to discover what makes one of the countries with the fastest growth rates in the EU, also a hotbed for gaming activity.

Estonia emerged from its Soviet shadow 30 years ago and has gained a reputation as a country with political stability, a free media and has become one of the most economically successful eastern European members.

Although growth is slowing due to infrastructure spending, an ageing population, weaker export markets and labour shortages, it still comes out at the top of the economic growth chart.

The economic growth rate in 2019 was 3.3 per cent and is expected to drop to 2.1 per cent this year according to forecasts by the Bank of Estonia. The unemployment rate is currently 4.6 per cent and is also expected to increase.

There are still undercurrents of corruption and crime. Danske Bank, for example, is undergoing another round of lawsuits over alleged money laundering, including a suspicious payment that went through a small branch in Estonia between 2007 and 2015.

Early last year, the former head of Danske Bank in Estonia was founded dead. Aivar Rehe had disappeared in September and was apparently a

witness to a US\$230bn ongoing money laundering investigation, but not a suspect. His body was found two days after he disappeared near his home and is being treated as suicide.

On a more positive note, the state budget strategy for 2020-2023 incorporates five priorities – a family friendly Estonia, a cohesive society, a knowledge-based economy, efficient governance and a free and protected state.

Estonia has a reputation of being at the cutting edge of information technology and by 2016 some 91 per cent of the population were online. Television is the country's most popular medium and has attracted foreign media groups and the main privately owned stations are run by three companies. Eesti Television, TV3 and Kanal 2 are the main public and commercial television sites.

The country's media last year was ranked 11th "most free in the world," but lately there have been stories of censorship and threats to journalists sharing 'aggressive' political articles. Several high profile journalists have quit their jobs after being offered a choice between "self censorship or departure" after criticising political

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The share tourism contributes to Estonia's GDP and employment is around eight per cent. Some 3.6 million tourists visited Estonia in 2018 – this figure was an increase of 1.3 per cent on the previous year and the number of foreign tourists accounted for 2.14 million, mostly consisting of Finnish, Russian, German and Latvian visitors to the country.

party EKRE on air, whilst the owner of leading newspaper, Postimees, appointed Peeter Helme (nephew of EKRE leader) as editor in chief, who later asked staff to "moderate" their style. He resigned from the position late last year.

This all stems back to early last year when parliamentary elections were held in March. Although the election was won by the opposition centre right Reform party, a coalition government had to be formed after the party failed to win a majority.

The leader of the Centre Party of Estonia, Juri Ratas (the then Prime Minister) invited EKRE to join a coalition government. The Conservative People's Party of Estonia (EKRE) won 19 of the 101 seats in the March 2019 parliamentary elections.

Kaja Kallas, who would have been the country's first female prime minister, had offered Ratas and his centre party a coalition where she would

be prime minister and the two parties would share ministerial posts equally.

However, Ratas instead arranged a three-way right wing coalition agreement with the conservative Fatherland party and far right EKRE, which enabled him to stay on as prime minister. The three now have a total of 56 seats in the 101 member parliament.

EKRE is said to be the fastest growing political force in Estonia and is headed by father and son Mart and Martin Helme, who are staunch white supremacy nationalists.

It managed to win voters over after a major rural party, the People's Union, shuttered back in 2011 leaving around 15 to 20 per cent of the electorate unrepresented. EKRE promoted lower taxes, increased government spending, anti immigrant policies and pro-family traditionalism and managed to increase its party vote from eight per cent in 2015 to 18 per cent in 2019.



EKRE has highlighted immigration as a key issue. In reality, Estonia is not on any major escape route into Europe and has a very small number of refugees, but EKRE has strict policies saying Estonia will not take any refugees as part of a European Union wide quota. A referendum is also due to be held in 2021 on whether heterosexual only marriages should only be permitted.

The parties also share ministries between them whilst Finance, Interior, Environment, Rural Affairs and Foreign Trade are headed by EKRE. Mart Helme is Interior Minister and Martin Helme is Finance Minister, which governs the gambling sector.



Although Estonia is not an obvious tourist destination, it is fast becoming popular with hiking fans and nature lovers eager to explore this rugged land.

After years under Danish, Swedish, German and Russian rule, Estonia eventually gained independence in 1918. After being incorporated into the USSR in 1940 it regained freedom in 1991 and the last Russian troops left in 1994.

The country joined the EU in 2004 and the OECD in late 2010, adopting the Euro in 2011. Estonia borders the Baltic Sea and Gulf of Finland between Latvia and Russia. It's a sparsely populated country with its 1.3 million

population spread across 15 counties. These counties are then divided into municipalities – urban and rural. A maakond (county) is the biggest administrative subdivision, whilst the government of each county is led by a governor who represents the national government at a regional level.

Although geographically Estonia shares a similarity with Latvia and Lithuania, it is culturally different and offers everything from forests, lakes and islands to the captivating capital city, Tallinn.

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3.6 million tourists visited Estonia in 2018 – this figure was an increase of 1.3 per cent on the previous year and the number of foreign tourists accounted for 2.14 million, mostly consisting of Finnish, Russian, German and Latvian visitors to the country.

Total tourism receipts for that year amounted to €1.98bn and there are around 1,600 accommodation venues offering more than 40,000 beds.

Amendments to the Tourism Act were introduced in July 2018 improving the conditions for travellers with increased protection and clearer information for travel packages.



THE GAMBLING MARKET

When Estonia was part of the USSR, all types of gambling activities were banned even though illegal casinos still operated despite the prohibition. However, the real history of gambling in Estonia began once the country was released from Soviet rule in the early 1990s. The country was so eager to bring foreign investment into the country it dished out licences like confetti.

In 1994, the government took a regulatory approach and enacted the Lottery Act and a year later the Gambling Act. This saw four types of gambling introduced – games of chance, games of skill, totalisators and betting. The gambling market boomed and there were 90 plus casinos and gaming halls in Tallinn alone by 2008 and more than 170 casinos and gaming halls in total across the country.

In 2009, the new Gambling Act 2008 was introduced providing a tighter legal framework to help curb underage gambling and included regulations for online gaming.

At the time, only Estonian companies could operate online gaming, but the market was

opened up further in 2011 and permitted foreign operators in a bid to boost revenues. These companies must obtain an Estonian gaming licence to operate.

The issue of activity licences and operating permits falls under the Maksu-ja Tolliamet (Estonian Tax and Customs Board – EMTA).

Today, the Estonian gambling sectors are governed by the Gambling Act 2008, the Gambling Tax Act plus the State Fees Act and General Law on Economic Activities Act and Money Laundering and Terrorist Financing Prevention Act.

The Gambling Act of 2008 includes the following:

- Types of gambling permitted are games of chance (gaming tables, slots etc); lotteries (classical and instant); Totos; games of skill; remote gambling (introduced in 2011); commercial lottery and tournament games of chance.
- Licences are not required for – skill games where the win is to re-enter the game;

lotteries with a prize pool of less than €1,000 and commercial lotteries.

- Operators of games of chance can be organised by a Public Limited Company or Private Limited Company with a share capital of at least €1m.
- Operators of games of skill can be operated by a public or private limited company with share capital of at least €25,000.
- Toto operators must be public or private limited companies with share capital of at least €130,000.
- An Operating Permit is issued for the opening of a gaming location to operate games of chance, Toto, games of skill, organising remote gambling or organising a lottery. These are issued for five years (lottery and remote gambling) or 20 years (games of skill locations) and five to 20 years (games of chance and Toto locations).
- Players must be over 21 years of age, whilst over 18s can play the Toto. Lottery is restricted to over 16 years of age.



Essential information and facts about Estonia:

Capital	Tallinn
Total Area	45,228sq.km
Population	1,244,288
Religion	Catholic (85.9%), Orthodox (1.3%)
Ethnic Groups	Estonian (68%), Russian (24%), Ukrainian, Belarusian, others
Languages	Estonian (official), Russian, others
Unemployment	4.3 per cent
Tourism	3.6 million
Government type	Parliamentary Republic
Chief of State	President Kersti Kaljulaid (since 2016)
Head of Government	Juri Ratas (since 2016)
Elections	President elected by parliament for five year term (plus second term). Prime Minister nominated by President and approved by parliament.

Online gambling has been legal since 2010 and was introduced to help Estonia's economy during the global recession. There are 16 active online gaming licences for sports betting and 12 active online sports betting licences. Betsafe, Optibet, Olybet and Unibet are the most popular sites officially operating in Estonia and offer bets on various games from football to hockey.

with the majority belonging to Olympic Entertainment (Olybet).

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Initially, Estonian gamblers were allowed to play online, but only at licensed sites and only by sites operated by local companies, then in 2011 regulations opened the market to offshore operators with the condition that licences are obtained from the Estonian authority. Any other illegal sites were blocked and to date the EMTA has listed over 1,500 blocked gambling websites.

Operators must obtain two types of licences – the Activity Licence, which certifies the applicant who wants to operate an online business, and the Operating Licence/Permit, which is obtained before organising a specific type of gambling such as lotteries, totalisators, slots or tables. Applications are made to the Tax and Customs Board (EMTA) and licences are issued for five years.

Average payouts must be more than 80 per cent and winning values of a skill game via remote gambling cannot be more than €50. Online tax

- Gaming halls and casinos can only be situated in separate buildings, hotels, conference centres or shopping centres with a separate entrance. They cannot be located near schools or youth institutions.

- Each gaming hall shall operate at least 40 slots or at least five gaming tables.
- To apply for an operating permit for a gaming site, applicants must submit written consent of the municipality, full description of the site, gaming equipment, rules, security overview and personal data protection information.

- A state fee is required for the review of application for a gambling licence:

- €47,940 for game of chance;
- €3,200 for games of skill;
- €31,960 for Toto.

- A state fee of €3,200 is required for review of an application for gambling (except lotteries)

- A state fee of €640 is required for the review

of an application for a lottery management licence.

- Taxes are covered by the 2009 Gambling Tax Act which includes:

- Gaming machines pay €300 per month per machine and 10 per cent of the GGR.
- Gaming tables pay €1,278 per table per month
- Games of skill pay €31.95 per game per month.
- Lottery tax rate is 18 per cent of ticket sales.
- Toto and online gambling pay five per cent of GGR.
- Gambling tournaments pay five per cent on amount collected from entry fee less prize pool proceeds.

ONLINE GAMBLING

Sports betting is rapidly gaining popularity in Estonia where players have to be 18 to play compared to 21 for online casinos. There are 25 betting points currently operating in Estonia

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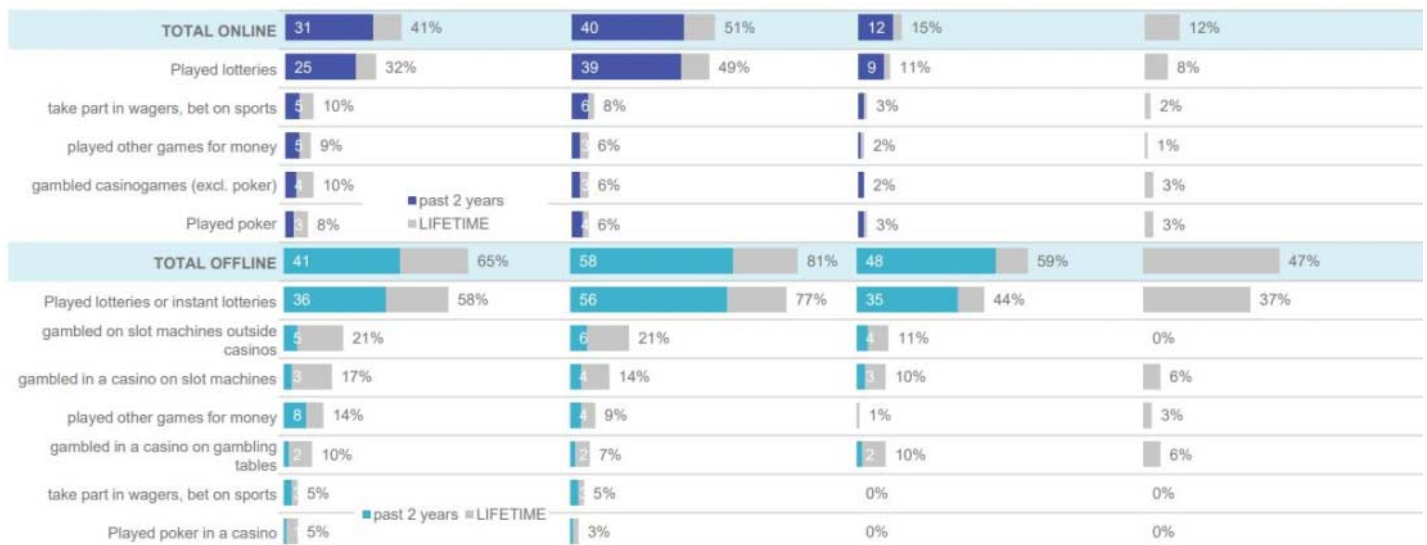
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Playing for money in various forms of gambling

percentage of respondents

n=2935



Gambling percentage of the population in past two years

Total **50%** respondents



is one of the lowest in Europe at five per cent of GGR.

The server must maintain records of players, including identification, and if not located in Estonia must cooperate with the Tax and Customs Board in terms of gambling supervisory regulations and anti money laundering laws.

In 2018, the EMTA released online gambling revenue data that saw online casino game GGR top €31m. With total online gambling GGR amounting to over €100m at the time across the Baltic States, Estonia saw the steepest level of growth in this region.

In 2019, this figure doubled to €60.2m GGR for online casino games with €1.64bn in total bets for this sector. Other sectors have also seen an increase in revenues including sports betting with a GGR last year of €21.9m, compared to €16.6m in 2018.

A study last year, Gambling Exposures of the Estonian Population 2019, was undertaken by the Ministry of Finance and revealed online

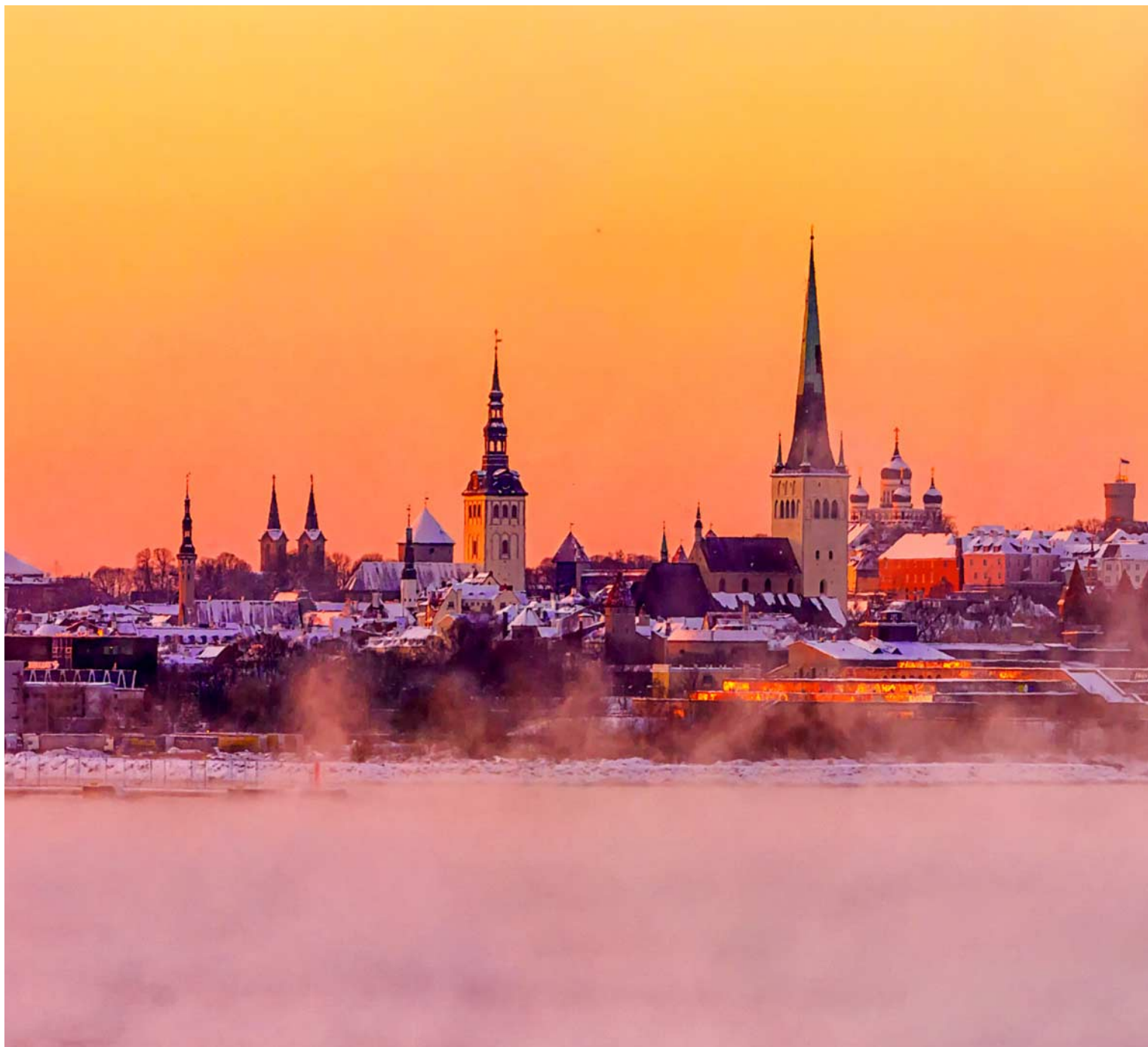
The most popular form of gambling online and offline is the lotteries with 43 per cent of the population having played the lottery. Other gambling types include slot machines (seven per cent), betting (six per cent), casino games (five per cent) and poker (four per cent) and 11 per cent have played other games.

gambling in Estonia had increased from 12 per cent to 31 per cent in the last five years. It also revealed gambling participation is declining, although problem gambling rates remain the same.

The report conducted by Kantar Emor outlined the following:

- 70 per cent of Estonian residents aged between 15 and 74 years have gambled in their lifetime, whilst 50 per cent of the same population have been gambling for money over the last two years. The figure in 2017 was 84 per cent and 66 per cent respectively.

- Of this figure, 41 per cent have gambled offline and 31 per cent have played online.
- The most popular form of gambling online and offline is the lotteries with 43 per cent of the population having played the lottery. Other gambling types include slot machines (seven per cent), betting (six per cent), casino games (five per cent) and poker (four per cent) and 11 per cent have played other games.
- Online gambling has increased from 12 per cent to 31 per cent between 2014 and 2019 and offline gambling has decreased from 48 per cent to 41 per cent during the same period.



- The profile of gamblers is fairly similar and the online/offline sectors are dominated by men aged 30–39 years and offline gamblers group are mostly from rural areas.
- Gambling amongst 15–20 year olds has decreased and among adolescents gambling is usually casual.
- Main reasons for gambling are a desire to win money; desire to win money to solve financial problems and entertainment (see charts above).

Meanwhile, online gambling provider SoftSwiss secured an acquisition deal last year with Kingswin Online, an Estonian online gambling operator, which runs the kingswin.com website. This marks SoftSwiss' entry into the Estonian market and the company's first entry into the B2C sector.

Kingswin has been powered by the SoftSwiss platform since 2015 and the acquisition came a

month after SoftSwiss announced a content deal with Greentube. Under the agreement, Greentube's portfolio of games will be distributed across a range of brands using the SoftSwiss online casino platform.

SoftSwiss has grown since, launching a large number of IT projects for the igaming industry. The company is located in Curacao and its software is developed in Belarus.

Ivan Montik, Founder of SoftSwiss said: "SoftSwiss' acquisition of Kingswin provides a major growth opportunity for both our businesses through an extended service offering for our clients. With a range of high profile clients, the acquisition of Kingswin supports the SoftSwiss strategy to lead the market and provide a complete online gaming solution in various counties."

SoftSwiss offers White Label solutions under the Estonian licence in addition to the Curacao and Malta gaming licences the company already

has. Also in Estonia, OptiBet operator Enlabs recently launched live casino games from Evolution Gaming on its site in the country.

Enlabs head of product, Chris Davis, told us: "I believe that live casino represents a big opportunity for Enlabs in the Baltics and beyond and our decision to partner with Evolution Gaming is a clear indication of this. This new provider addition is the most important live casino product improvement in Enlabs history."

"Live casino has become a popular product and the fact that Evolution Gaming is the market leader in this vertical, we have no doubt that this partnership will generate continued growth for what is already our fastest growing brand."

The Estonian launch is the first stage of a long term collaboration between Evolution and Enlabs. Optibet is Enlabs primary gaming brand offering casino, live casino, betting, poker and bingo to players in the Baltics and neighbouring markets.



LOTTERY

EESTI LOTO

LOTTERY RETAILERS

770

LOTTERY REVENUE

€55.5M (TURNOVER 2018)

ONLINE CASINO GGR

€60.2M

BETTING POINTS

25

BETTING GGR

€21.9M

CASINOS

55

CASINO SLOTS

1954

CASINO TABLES

106

CASINO REVENUE

€52.4M

TOTAL GGR

€142.5M

THE LOTTERY

Eesti Loto is a state owned company which has 770 sales outlets in the country. The lottery pays a gambling tax of 18 per cent and this tax is divided up and dished out to support cultural projects (49.3 per cent), regional investment aid (12.7 per cent), youth projects (10.1 per cent), welfare projects (15.3 per cent), Olympic projects (8.2 per cent) and sports projects (4.2 per cent).

Lottery turnover for 2018 amounted to €55.5m (compared to €54.9m in 2017) whilst the first nine months of 2019 sales amounted to €42.6m (compared to first nine months of 2018 with €40.4m) of which the classic lottery was responsible for €35.3m and the instant €6.4m.

The lottery offers some 11 products including seven instant lotteries and four classic lottery games – Bingo Lotto; VikingLotto, Eurojackpot and Keno. The classic games account for over 83 per cent of turnover. Profit for the 2018 financial year was €8.01m.

The increase in turnover in 2018 was mainly down to sales of Eurojackpot and Keno growth. In total 424,400 people played the lottery in 2018 a 4.1 per cent drop from the previous years.

This is said to be down to the mandatory identification system which was introduced in 2016 and initial disappointment with changes to the VikingLotto game in 2017.

“As a result of the procurement we get the expected flexibility of a modular and completely scalable platform to provide our players with convenient operation and new products. The player management system together with the web portal is the first and central component in the process of a comprehensive upgrade of the lottery information system.”

Riina Roosipuu, Chief Executive Officer of Eesti Loto

However, there was an increase in players buying tickets online and in 2018 online sales represented almost 59 per cent of total sales – an increase of 7.4 per cent in the year.

In 2018 Eesti Loto handed over €5.5m in dividends to the state budget and over €12.7m in taxes and €21.4m in winnings.

The game with the biggest turnover in 2018 was the Eurojackpot with €18.4m followed by VikingLotto with €13.1m and Bingo Loto with €10.6m. VikingLotto is a joint lottery game between Scandinavia and the Baltics with a jackpot of at least €3m.

At the end of 2019 Germany's Quality Group Lottery Solutions (TQG-LS) won a contract to

provide a lottery management platform to Eesti Loto. This contract is for five years and was won after a public tender.

The TQG Lottery Suite platform offers important functions to provide players with convenient operation and new products.

Riina Roosipuu, Chief Executive Officer of Eesti Loto commented: “As a result of the procurement we get the expected flexibility of a modular and completely scalable platform to provide our players with convenient operation and new products. The player management system together with the web portal is the first and central component in the process of a comprehensive upgrade of the lottery information system.”

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Novomatic Lottery System initially won the tender back in 2017 for contract for the provision of a new Information System to managed its sales in all channels.

The technology platform was designed to enable Omni channel lottery sales and the BYOT (Bring Your Own Terminal) philosophy to allow Eesti Loto to utilise existing assets or deploy modern table or mobile devices. However, this contract ended in October 2018 and NLS paid EestiLoto a contractual penalty of \$461,629 for non performance of the contract.

CASINOS

There are four operators with gaming halls/casinos in Estonia, which between them operate a total of 55 venues, hold 1,954 slots and 106 gaming tables. Slot GGR for 2019 amounted to €52.4m. The casinos see a GGR on average per month from slots of around €4m.

The Olympic Casino Group has 24 locations followed by Novoloto with 21 locations, Best4U (City Casino) has five locations, whilst PAFER has five shipboard casinos.

Olympic Entertainment Group operates casinos, gaming halls and sports bars and they began operating in 1993 when the first Olympic casino opened at the Pirita Hotel in Tallinn with 57 slots.

Over the next few years several casinos and gaming halls were opened and in 2006 the company acquired the Kristiine Kasiino brand

previously owned by KC Grupp which has 11 casinos. Over the next few years the Kristiine casinos were re-branded.

In 2014 the company acquired the operations of two casinos via operator Casino Cleopatra and a year later casinos from operator MC Kasiinod Ou bringing its total number of casinos to 24.

In 2016, OEG opened its new flagship casino Olympic Park Casino at the Hilton Tallinn Park Hotel, which is 1,600sq.m in size with 95 slots and 14 table games.

OlyBet, formerly Olympic-Online, was set up in 2010 and provides online gambling from sports to casino games. It was the first company to open an online casino just a month after the new online law came into place. OlyBet is owned by Olympic Entertainment Group and operates betting shops within the 24 casinos. There are table games in three of these locations – Olympic Park Casino and Olumpia OlyBet Sports Bar in Tallinn and Ulikooli Sports Bar in Tartu.

Casino Olümpia is the company's largest sports bar and is located at the Radisson Blu Hotel in Tallinn offering live sports, slots and table games. Meanwhile, the Ulikooli Sports Bar in the heart of Tartu provides slots, table games and sports betting. The company operates a total of 1,010 slots, 25 tables and 20 Club Poker tables. Olympic also has an online licence for Olybet and company growth is 20 per cent year on year.

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In October 2018, Odyssey Europe completed its takeover of OEG, before announcing that the two companies would be merged into a single entity, appointing Corey Plummer as CEO.

Paul Mettam, Group Marketing and VP Director said: "Our land-based market in Estonia is very stable with year on year growth for the last five consecutive years. Our operation in Estonia benefits from a well established and stable regulation and taxation."

Novoloto OÜ was founded in 1996 and operates in Estonia under the brand Fenikss Casino. Novoloto is part of the Novomatic AG Group. Last year Urve Palo, the former Estonia minister of population and ethnic affairs became the new executive director of Novoloto.

The first casino opened in 1993 in Hotel Tallinn under the brand Play-In Casino, whilst the most recent Fenikss Casino opened in June 2017 in Lasnamäe Shopping Centre. Last year Novoloto also purchased Grand Prix Casino resulting in the acquisition of seven casinos. Grand Prix Casinos was run by IMG Kasiinod AS and opened its first casinos back in 1989. It currently operates the GrandX Online Casinos set up in 2011 and licensed in Greece and Estonia.

Novoloto currently operates a total of 550 slots and 75 electronic roulettes in 21 gambling halls in Estonia with another due to open in March/April 2020.

REVENUE AND TAX PAID IN 2018 / 2019 PER CATEGORY

CATEGORY	2018	2019
LANDBASED		
Casino slots		
GGR	€53.3m	€52.4m
Tax	€13.1m	€12.5m
Casino tables		
Tax	€1.70m	€1.64m
Poker cash games		
GGR	€609,891	€672,889
Tax	€30,494	€33,644
Poker tournaments		
GGR	€478,509	€719,005
Tax	€23,925	€35,950
Total bets	€4.8m	€10.9m
ONLINE		
Online casino games		
GGR	€31.2m	€60.2m
Tax	€1.55m	€3m
Total bets	€944.9m	€1.64bn
Sports betting		
GGR	€16.6m	€21.9m
Tax	€834,238	€1.09m
Total bets	€358m	€470m
Poker tournaments		
GGR	€3.77m	€3.64m
Tax	€187,540	€182,379
Total bets	€12.7m	€13.9m
Poker cash games		
GGR	€3.20m	€3.03m
Tax	€160,032	€151,623

Of the total people (aged between 21 and 74 years) over the past two years, the machines in the casino have been played by four per cent (36,665 people in total). Although the number of gambling players is higher than in previous studies the frequency of game play among players has fallen by four per cent.

A Novoloto spokesperson said: "The Estonian economy continues to grow at a rate of two to three per cent per year. Last year's growth was 3.4 per cent. Economic growth is slowing as export markets are weaker than before and the lack of workforce is still a problem in Estonia.

"However despite the slower economic growth, wage increases continue and it can be concluded that the overall consumption of people is not reduced. Of the total people (aged between 21 and 74 years) over the past two years, the gambling machines in the casino have been played by four per cent (36,665 people in total). Although the number of gambling players is higher than in previous studies, the frequency of game play among players has fallen by four per cent."

Best4U operates the City Casino brand and began its activities in Estonia back in 2001 by opening Bally's Casino. It was a chain of gaming halls belonging to Ritzio Entertainment Group

called City Casinos. Today, City Casino has five gaming halls, four of which are in Tallinn - Mustamäe City Casino, Coca-Cola Plaza City Casino, Mustakivi City Casino, Marja City Casino and Parnu City Casino

Finally, Pafer As (PAF) holds an online gambling licence and a licence for gambling onboard casinos with five shipboard casinos in Estonia. There are three small onboard casinos with six gaming tables in total and there are a total of 165 slots across the five casinos.

In January, Estonia saw its biggest ever jackpot winner with €3.6m on the slots. A young Estonian lady won on the Hall of Gods via Paf.com, winning with only a 20c stake.

PAF operates slots and table games on a total 33 cruise ships in the Baltic and North Sea. It has ongoing partnerships with Viking Line, Tallink Grupp, Eckero Group, Finnlines and Moby St Peterline and since 2017 Norway's Color Line.



LICENSED OPERATORS IN ESTONIA

COMPANY	BRAND	CASINO	ONLINE	SHIP	TOTO	LOTTERY
Loto Joint Stock	Estonian Loto					Yes
IMG Casinos	Casino GrandPrix		Yes			
Novoloto	Fenikss Casino	21	Yes		Yes	
Olympic Entertainment	Olympic Casino/Olybet	24	Yes		Yes	
Tonybet	Tonybet		Yes		Yes	
Best4U	CityCasino	5				
Reel Estonia Ltd	Pokerstar		Yes			
PAFER	PAF		Yes	5	Yes	
Totalizator	Toto				Yes	
Triogames	Betsafe		Yes		Yes	
KingsWin Online	Kingswin		Yes			
Lexbyte Digital	Unibet		Yes		Yes	
Optiwin	Optiwin/Optibet		Yes		Yes	
Dreambox Games	Chanz		Yes		Yes	
StayCool	Coolbet					
Bravio			Yes		Yes	
yes						
GLB	Goalbet/Arena				Yes	
Kopikas Entertainment	Slots		Yes			
Hillside	Bet365		Yes		Yes	
SafeEnt Ltd	Ninja Casino		Yes			
Play North	Cherry&Bear casino		Yes			
TOTAL		50 casinos	16 licences	5 casinos	12 licences	1

PAF group company turnover for 2018 amounted to €111.8m with gaming revenues from internet gambling falling from €84.5m to €80m over the year period. The drop in online gaming revenues was attributed to PAF's introduction of a yearly limit on losses for online customers to offer a more 'socially responsible' gaming product. The yearly loss limit is now set to €25,000.

PAF group company turnover for 2018 amounted to €111.8m with gaming revenues from internet gambling falling from €84.5m to €80m over the year period and land shipboard gaming at €31.8m (€31.9m in 2017).

The drop in online gaming revenues was attributed to PAF's introduction of a yearly limit on losses for online customers to offer a more 'socially responsible' gaming product. The yearly loss limit is now set to €25,000 and was introduced in September 2018.

Growth products include sports betting, slot machines, live casinos and lotteries. The company has over 187,800 customers.

Meanwhile, in November last year the Tallinn city government approved a new bill which will see a restriction on the sale of alcohol in bars, nightclubs, pubs and entertainment venues as from June 2020.

This means the sale of alcohol will be prohibited during weekdays from 2am until 6am and on weekends from 3am until 7am. Exceptions to this ban, however, include casinos/gaming halls, hotel and accommodation locations, Tallinn

airport and port ferry passengers.

The city wants to maintain public order, protect the urban environment, protect public health and maintain the image of Tallinn as a tourist hub. The city also wants restrictions to prevent youngsters from being exposed to alcohol stores and drinkers to help reduce the effects of alcohol on young people. Alcohol stores would have to be 150m from childcare institutions.

The Chamber of Commerce and Industry has been against the proposals saying despite the restrictions being "noble" are unjustified, incomprehensible and disproportionate, meaning there is unequal treatment between business operators.

They also fear that consumers will merely drink more before the cut off time. In recent years alcohol advertising has been severely restricted.

There are currently 182 establishments in Tallinn that sell alcohol for on-site consumption after midnights of which 131 are located in central Tallinn. There are currently 85 venues in Tallinn which sell alcohol for on-site consumption after 3am.