

# **Order and reprimands for Unibet (Denmark) Limited**

18, Feb 2022

On 16 February 2022, the Danish Gambling Authority have ordered Unibet (Denmark) Limited (hereinafter referred to as "Unibet") to update their risk assessment (section 7(1) of the AML Act) so that all relevant risks are included in the risk assessment.

The Danish Gambling Authority has also given Unibet a reprimand for breaching the rules on business procedures (Section 8(1) of the AML Act), know your customer (KYC) measures (sections 10, 11 and 17) of the AML Act), politically exposed persons etc. (section 18 of the AML Act) and the rules on the obligation to investigate (section 25 of the AML Act) and the obligation to report (section 26 of the AML Act).

## **Inspection with all of Unibet's obligations under the Anti-Money Laundering Act**

The Danish Gambling Authority have found a number of breaches in connection with the authority's inspection of Unibet covering all of Unibet's obligations under the Anti-Money Laundering Act.

An order is given based on the breach of the rules on risk assessments because the Danish Gambling Authority have found that Unibet has not sufficiently made a risk assessment of their customer types and the games offered. This causes an increased risk of Unibet being used for purposes of money laundering through gambling.

A reprimand is given for a breach of the rules on business procedures, because, until the 25th of January 2022, Unibet did not have sufficient written business procedures for ongoing monitoring of existing customer relations. Up until the same date, Unibet did not have sufficient operational business procedures for collecting and assessing documentation in relation to suspicions of money laundering and mitigation of existing risks at certain payment methods.

A reprimand is given for a breach of the rules on politically exposed persons etc., because up until the 22nd of April 2021, Unibet had insufficient business procedures for managing politically exposed persons, their family members and close associates.

A reprimand is given for a breach of the rules on KYC measures because the Danish Gambling Authority in a spot check of 20 of Unibet's high roller customers found that Unibet in five of the cases has not taken sufficient KYC measures. Moreover, in three of the five players' cases, Unibet had neglected their obligation to investigate suspicious transactions, just as Unibet in one if the five players' cases had neglected to make an immediate report to the Money Laundering Secretariat upon knowledge of, suspicion of or a reason to assume money laundering.

## **Inspection in connection with a report from a citizen**

Moreover, the Danish Gambling Authority have found breaches of the Anti-Money Laundering Act's rules on KYC measures, obligation to investigate, and obligation to report in connection with an inspection of Unibet based on a report about high stakes gambling from a citizen.

A reprimand is given because Unibet has let a young player deposit more than DKK 1 million to his account during a year without having sufficient knowledge of whether the players funds originated from criminal proceeds. The funds were deposited via six different payment slips out of which at least one slip did not belong to the player. Unibet only attempted to investigate the origin of the funds after the player

was no longer active with Unibet and after the Danish Gambling Authority has requested Unibet to submit notes relating to money laundering on the player.

The reprimand is also given because Unibet neglected to immediately report the matter to the Money Laundering Secretariat, since the report was made more than six months after Unibet had a suspicion of money laundering that could not be disproved and after the Danish Gambling Authority had consulted Unibet on the case.

## Obligation to act

The Danish Gambling Authority has given Unibet a deadline of 2 months to comply with the order to correct the risk assessment.

The reprimands do not subject Unibet to an obligation to act since the breaches no longer exists.

The Danish Gambling Authority notes that the rules on risk assessment, business procedures, KYC measures, and the obligation to investigate and report are fundamental parts of the Anti-Money Laundering Act. Breaches of the rules lead to an order or a reprimand.

## Other news

### **Order and reprimands for Unibet (Denmark) Limited (order-and-reprimands-unibet-denmark-limited)**

18 Feb 2022

On 16 February 2022, the Danish Gambling Authority have ordered Unibet (Denmark) Limited (hereinafter referred to as "Unibet") to update their risk assessment (section 7(1) of the AML Act) so that all relevant risks are included in the risk assessment.

[MORE \(ORDER-AND-REPRIMANDS-UNIBET-DENMARK-LIMITED\)](#)

### **Reel Denmark Limited reprimanded for breach of Anti-Money Laundering Act (reel-denmark-limited-reprimanded-breach-anti-money-laundering-act)**

11 Feb 2022

On 10 February 2022, the Danish Gambling Authority has reprimanded Reel for breaching the rules on know your customer (KYC) measures of section 10(1) of the Anti-Money Laundering Act (AML Act), the rules on the obligation to investigate of section 11(1)(5) of the AML Act, and the rules on the ob

[MORE \(REEL-DENMARK-LIMITED-REPRIMANDED-BREACH-ANTI-MONEY-LAUNDERING-ACT\)](#)

### **Pub sentenced to pay fine for offering illegal lottery (pub-sentenced-pay-fine-offering-illegal-lottery)**

08 Feb 2022

On 27 December 2021, a pub has been sentenced to pay a fine of DKK 5,000 for offering lottery and betting on results of lotteries illegally.

[MORE \(PUB-SENTENCED-PAY-FINE-OFFERING-ILLEGAL-LOTTERY\)](#)

Spillemyndigheden - Englandsgade 25, 6. sal - 5000 Odense C.

mail@spillemyndigheden.dk | 72 38 79 13

CVR: 34730415 | EAN: 5798000033962

[Accessibility statement \(danish\) \(<https://www.was.digst.dk/spillemyndigheden-dk>\)](#)

**Language** EN (order-and-reprimands-unibet-denmark-limited) [DA \(/nyheder/paabud-og-paataler-til-unibet-denmark-limited\)](#)