

From: Yothika Chetty <yothika.chetty@playngo.com>
Sent on: den 7 augusti 2026 15:40:41
To: Registrator <Registrator@spelinspektionen.se>
CC: Andrew Pink <Andrew.Pink@playngo.com>; Henrik Gedda <henrik.gedda@playngo.com>
Subject: Play'n GO Response to Consultation 21Si540 – Proposed Regulations on Responsible Gambling
Attachments: Play'n GO Response to Consultation 21Si540.docx (52.87 KB)

Dear Sir/Madam,
Play'n GO is pleased to submit the attached response to Spelinspektionen's consultation on the proposed regulations concerning responsible gambling, with reference number 21Si540.
Best regards,

Yothika Chetty | Head of Compliance

yothika.chetty@playngo.com | www.playngo.com

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To: Spelinspektionen

Re: Consultation 21Si540 – Proposed Regulations on Responsible Gambling

Submitted by: Play'n GO

Play'n GO welcomes Spelinspektionen's continued efforts to strengthen consumer protection and promote a sustainable, well-regulated gambling market. We support the overarching objective of ensuring that gambling products are offered in a manner that protects consumers and mitigates the risks associated with excessive gambling. These principles are central to maintaining confidence in the licensed market and ensuring a sustainable long-term future for the industry.

We are particularly supportive of the proposed provision in Chapter 12, Section 1, which states:

"A game must not give the impression that the player can influence their chances of winning through their own settings or choices if the chances of winning depend solely on chance."

Play'n GO believes this provision reflects an important consumer protection principle. Wherever outcomes are determined entirely by chance, players should not be encouraged to believe that personal choices, selections or configurations can meaningfully improve their likelihood of success.

While we strongly support the intention behind the proposed wording, we believe additional clarification would strengthen the effectiveness of the provision and provide greater legal certainty regarding game features that may be inconsistent with its objective.

Bonus Buy Mechanics and the Appearance of Player Influence

In Play'n GO's view, Bonus Buy mechanics appear difficult to reconcile with the purpose of Chapter 12 Section 1.

Although the outcomes generated by Bonus Buy features remain random, these mechanics are specifically structured around a player's decision to purchase access to a particular feature, bonus round or volatility profile. This design encourages players to make deliberate choices between different game experiences that may be perceived as offering superior opportunities or outcomes.

The central issue is not whether the underlying mathematics remain random. Rather, it is whether the design and presentation of the mechanic encourages players to believe that selecting one option over another represents a meaningful strategic decision capable of improving their prospects within a game of chance.

Bonus Buy mechanics do not merely offer access to content. They present players with a menu of paid alternatives that vary by bonus type, volatility profile or potential payout characteristics. The existence of that choice itself may communicate that one option is superior to another, notwithstanding that all outcomes remain purely chance-based. The purpose of Chapter 12, Section 1 is to ensure that players are not given the impression that choices or settings can influence winning opportunities where outcomes depend solely on chance. Play'n GO believes it is appropriate for Spelinspektionen to consider whether Bonus Buy mechanics fall within the intended scope of this principle.

Bonus Buy Mechanics Can Undermine Stake-Based Player Protection Measures

Play'n GO further believes that the consumer protection objectives underpinning Chapter 12, Section 1 should be considered alongside the broader responsible gambling objectives set out throughout the proposed regulations.

Bonus Buy mechanics have a unique characteristic that distinguishes them from standard slot gameplay. They allow players to gain immediate access to bonus content through a single purchase that may significantly exceed the cost of an ordinary game round.

For example:

- A game with a maximum stake of SEK 50 per spin may offer a Bonus Buy feature priced at 100x the base stake, resulting in a single purchase of SEK 5,000.
- A game with a maximum stake of SEK 100 per spin may offer a Bonus Buy feature priced at 200x the stake, resulting in a single transaction of SEK 20,000.
- In some international markets, Bonus Buy products have historically been offered at multiples of 500x the base stake or higher, creating exposure levels far beyond those associated with a standard wager.

While these transactions are typically structured as the purchase of a game feature rather than a conventional stake, the practical outcome is that players can immediately access levels of expenditure and volatility that would otherwise require a substantial number of individual game rounds.

This raises important, responsible gambling considerations because it can substantially reduce the natural behavioural friction that exists during ordinary gameplay. Instead of progressing through a series of discrete betting decisions, players are able to access high-volatility content instantly through a single transaction.

As a result, Bonus Buy mechanics can undermine the practical effect of stake-based player protection measures. While such measures are designed to restrict immediate exposure and encourage responsible participation, Bonus Buy features can permit

substantially greater exposure through product design rather than through ordinary gameplay.

From a consumer protection perspective, this creates a regulatory loophole whereby the intent of stake-based player protection measures may be bypassed without formally breaching the underlying controls.

Play'n GO believes regulators should be cautious of game mechanics that permit players to gain access to significantly increased risk exposure through design features that circumvent the practical effect of responsible gambling safeguards.

Alignment with Responsible Gambling Objectives

Throughout the consultation materials, Spelinspektionen emphasises the importance of strengthening consumer protection, reducing excessive gambling behaviour, improving the effectiveness of safer gambling measures and ensuring that game design supports these objectives.

Play'n GO has consistently supported regulatory initiatives that promote sustainable gambling environments and reduce product features that intensify gambling behaviour or undermine responsible gambling objectives.

A number of regulated markets, including the UK and the Netherlands, have already concluded that Bonus Buy mechanics are incompatible with modern consumer protection frameworks and have prohibited their use. While every regulatory regime is different, these developments reflect a growing international recognition that game features should not be used to circumvent the intent of stake limits or other player protection controls.

Against this backdrop, Play'n GO believes that Chapter 12, Section 1 represents an important opportunity to provide greater clarity regarding the acceptability of such mechanics within the Swedish market.

Suggested Clarification

To provide legal certainty for operators, suppliers, testing laboratories and certification bodies, Play'n GO respectfully encourages Spelinspektionen to clarify that the prohibition extends to game mechanics that:

- present players with choices or purchasing options that may reasonably be perceived as improving the prospect of favourable outcomes within a game of chance;
- create an appearance of strategic decision-making where the outcome remains wholly random;

- enable access to game states or bonus content in a manner that undermines the practical effect of stake controls or other responsible gambling safeguards; or
- permit substantially increased exposure to expenditure or volatility through feature purchases that would not ordinarily be possible through standard gameplay.

Such clarification could be incorporated into the final regulation itself or, alternatively, included within accompanying regulatory guidance.

Conclusion

Play'n GO strongly supports Spelinspektionen's objective of ensuring that players are not given the impression that they can influence chance-based outcomes through personal choices, settings or game configurations. We also support the wider objective of strengthening protections against excessive gambling and ensuring that game design aligns with responsible gambling principles.

We respectfully submit that further clarification should be considered to ensure that Chapter 12, Section 1 adequately captures game mechanics that may create a perception of player influence, circumvent the practical effect of stake-based protections or otherwise undermine the policy objectives underpinning the proposed regulations.

In particular, Play'n GO believes that Bonus Buy mechanics warrant careful consideration given their ability to facilitate immediate access to significantly higher expenditure and volatility levels creating the potential for rapid, high-value betting decisions without sufficient opportunity for reflection.

Clarifying the application of Chapter 12, Section 1 to such mechanics would strengthen consumer protection, improve regulatory certainty and further support Sweden's ambition to maintain a safe, sustainable and well-regulated gambling market.

Sincerely,

Yothika Chetty

Head of Compliance

Play'n GO