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THIS WEEK

- **Japan's Diet delays gambling addiction bill**
- **Eccles to leave FanDuel, King to take over reins**
- **Tabcorp/Tatts given ACT approval, again**
- **Bwin goes live with Russian site**
- **Helen Walton, CCO, Gamevy**
- **Guest Columnists: Will Mace, Head of Kindred Futures and Jonas Cederholm, CEO Game Lounge**

WEEK 47

FRIDAY 24 NOV 2017

NEW JERSEY STATES ITS CASE FOR SPORTS BETTING

Final written arguments before Supreme Court hearing



Representatives acting for the state of New Jersey and the New Jersey Thoroughbred Horseman's Association have filed legal briefs stating their case before the US Supreme Court.

The briefs represent the final time that written testimony can be filed before the Supreme Court hears oral arguments against the validity of the Professional and Amateur Sports Participation Act (PASPA) on 4 December.

In a 36-page document, Ted Olson, acting as the main attorney for the state of New Jersey said: "PASPA's prohibition on state "authorisation by law" impermissibly commandeers state regulatory authority by dictating the content of state law-states may not legalise sports wagering. Because this constraint on state legalisation is central to the statutory scheme, the entire statute should fall, because Congress would not have otherwise enacted PASPA.

"Without this central provision, PASPA would allow states to legalise sports wagering but prohibit them from regulating it, opening the floodgates to a ▶

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THIS WEEK IN NUMBERS



Year-on-year rise in Stride Gaming's net gaming revenues for the third quarter of 2017



The total amount Caesars has paid for two casino properties in Indiana



The prize offered by lottery operator Camelot to attract younger players



Percentage of Swedish adults who have gambled in the last year, according to the national regulator



multi-billion dollar expansion of uncontrolled and underground sports wagering. The Congress that enacted PASPA cannot have wanted that irrational result; to the contrary, the text of PASPA's exceptions makes clear that Congress wanted sports wagering, wherever it might be permitted, to be regulated by states."

Supporting the states' argument with their own 31-page brief, the New Jersey Thoroughbred Horseman's Association (NJTHA) said that: "The NJTHA, State Petitioners, and many amici contend that PASPA's most natural meaning is that it commands the states to prohibit sports wagering. Respondents and the United States do not dispute that if PASPA is interpreted this way, it is unconstitutional."

The NJTHA also contends that PASPA is fundamentally constructed in such a way "that permits the Court to avoid deciding the constitutional question presented". It argues that justices in New Jersey's two legal hearings in US circuit courts (in 2014 and 2016) have used this avoidance as a vehicle to dismiss New Jersey's attempts to legalise sports betting in their state.

In its brief, the NJTHA puts a final kick into the constitutional validity of PASPA by dismissing the contention that it "does not require states to maintain or enforce anything" and as such provides the states "with many sports-betting choices, such as a full repeal of sportsbetting prohibitions and some partial repeals of sportsbetting prohibitions."

With almost 20 states now openly supporting the repeal of PASPA, and more recently the NBA shifting its emphasis from background support to open advocacy, the Supreme Court review promises to be one of the most highly contested in US legal history. With a potential \$15bn industry on the line, there is a lot at stake for states and gambling operators alike in the US.

KEY POINTS

- State of New Jersey and New Jersey Thoroughbred Horseman's Association file written legal briefs with US Supreme Court
- Both contend that PASPA is unconstitutional
- US sports betting market could be worth up to \$15bn if legalised

JAPAN'S GAMBLING ADDICTION BILL POSTPONED UNTIL 2018

Bill shelved until next year's budget

Japan's two ruling coalition parties have announced that they have decided to maintain their stance on postponing the consideration of a gambling addiction bill till next year.

The bill, known as the "Basic Bill on Gambling Addiction Countermeasures", will be evaluated when Japan's annual budget is passed next year, which could be between May and June of 2018.

Earlier this month, the Japan Innovation Party requested that the ruling parties pass the bill in order to enact it before the current Diet session ends on the 9 December. However, the appeal was rejected by the ruling coalition Komeito party.

The Komeito party explained that it needed more time to discuss with opposition parties in order to create a thoroughly considered addiction bill, instead of rushing it in a short period of time.

The party also reaffirmed that it would not move forward with the Integrated Resorts Implementation Bill until the gambling addiction bill is passed.

Also in the region, a Japanese resort developer has announced its interest in entering the race for one of the two casino licences the government is expected to grant as a result of last year's legalisation of casino gambling.

Kamori Kanko, a private tourism company, announced a partnership deal with developer Niseko Alpine Developments for the redevelopment and expansion of the Hokkaido-based Rusutsu Resort.

According to analysts, the Japanese casino market could be worth between \$5bn and \$20bn, when and if the two casino resorts become fully operational. If the government approves the IR Implementation Bill next year, it is believed that the potential casino complexes will not open doors before 2023.

FANDUEL CEO ECCLES STEPPING DOWN

All change at the top for DFS operator

Daily fantasy sports heavyweight FanDuel has announced that its

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Gross win margin experienced by William Hill's UK retail division during Q3

Co-Founder and current CEO Nigel Eccles will be leaving the company.

Matt King, who most recently served as CFO for the company from 2014-2016 has been named as the new CEO and will join the board of directors immediately.

Before joining FanDuel in 2014, Matt King was a director at Kohlberg, Kravis, Roberts and Co., as well as at KKR Capstone for 11 years where he focussed on building new lines of business for KKR, due diligence on new investments, and improving the operating performance of KKR's portfolio companies. In his new role, King will be primarily based at FanDuel's New York headquarters.

In a statement announcing the appointment, FanDuel's Board of Directors paid tribute to the role that Nigel Eccles played in shaping the company, saying: "Nigel achieved something remarkable - he completely redefined an existing industry. His passion, intelligence, and focus have been the bedrock of FanDuel's success.

"We would like to offer our sincere thanks as he leaves to pursue his next venture. We are excited to work with Matt again. He is an exceptional

executive who knows the business intimately, and has a clear vision for its next phase of growth."

Outgoing CEO Nigel Eccles heaped praise on new CEO Matt King, saying: "With his strategic vision, range of experiences, and broad skillset, I cannot imagine a better individual to steer FanDuel forward.

"With tremendous legislative strides in the past two years and the business moving into profitability in Q4, FanDuel is in a great position. I know Matt is the leader to capitalise on the momentum in the sports technology space to take FanDuel to the next level."

New FanDuel CEO Matt King added: It's an incredible honour to return to FanDuel at such an exciting time for the company.

"Over the past eight years, Nigel has built one of the most disruptive companies in the sports world. I look forward to working with our talented team to make FanDuel the place for fans to engage with sports they love in new and exciting ways."

In addition to the appointment of Matt King to the role of CEO, FanDuel



10,000+

Number of jobs generated by the casino industry in South Africa

2023-24

The date at which Sky Bet's sponsorship of the EFL will finish

\$10M

Amount of shares sold by Genting Hong Kong in its cruise operator, Norwegian Cruise Line Holdings

2,500

Number of legal cases involved in UK binary trading related scams since 2012



\$2.1bn

Estimated value of Brazil's online gambling market, if regulated

20.7%

Percentage that Atlantic City's casino earnings grew in the third quarter

18

The number of lottery licences threatened to be withdrawn from Nigeria

have also announced the appointments of Carl Vogel and David Nathanson to the roles of chairman of the board and independent director respectively. Vogel previously served as the Vice-Chairman and President of DISH Network Corp, one of the largest satellite broadcasters in the US, while Nathanson is an 18-year veteran of the 21st Century Fox media group.

TABCORP/TATTS GROUP MERGER BACK ON?

Long-running saga could be over by end of the year

The Australian Competition Tribunal (ACT) has approved for a second time the A\$11.3bn merger between Australian lottery operator Tabcorp and its main competitor Tatts Group.

Authorisation for the deal comes with the condition that Tabcorp divest its interests in its Odyssey Gaming Business based in Queensland, a condition to which Tabcorp had previously agreed to adhere to if the multi-million dollar merger was approved.

In a statement announcing its decision, Australian Competition Tribunal chairman Rod Sims said: "When the ACCC sought review of the Tribunal's earlier determination, our purpose was to clarify the law. We achieved that objective, with the Full Court making it clear that the Tribunal was required to take into account all competitive detriment that is likely to result from the proposed merger."

The two companies began takeover talks in November 2016, however in March 2017, shortly after the Australian Competition & Consumer Commission had published a statement of issues regarding the proposed acquisition; Tabcorp withdrew its application for informal clearance to proceed with the ACCC and lodged a separate application for authorisation with the Australian Competition Tribunal.

In June, the ACT granted permission for the merger to take place, but the ACCC, and later Australian betting company Crownbet, applied to Australia's Federal Court for a judicial review of this decision.

A central issue in this debate has been claims that the deal would impact market competition unfairly as well as consumer pricing.

However, Sims added: "The Tribunal has now reconsidered the evidence, in relation to both anti-competitive detriment and public benefit, and concluded that the merger is likely to result in such benefit that it should be permitted to proceed."

A full transcript of the reasons behind this decision will be published on Wednesday, 22 November and the ACCC will then consider the tribunal's reasons for this decision over the next few weeks.

BWIN LAUNCHES RUSSIAN ONLINE BETTING PLATFORM

First international operator to crack the Russian market

Global sportsbook operator Bwin has announced the official launch of its inaugural Russia-facing website, Bwin.ru. Bwin has also confirmed that it will soon start accepting bets from gamblers within Russia.

Bwin.ru is based on a partnership with local businessman Alexander Mamut, owner of Russian-licensed bookmaker Digital Betting LLC and online media company Rambler & Co which operates several news websites in Russia.

Under the terms of the original partnership, Digital Betting LLC will provide up to €11.2m per annum of funding to the project over the next three years, while Bwin will provide its technological infrastructure and branding to the project in return for a percentage of the potential profits generated by the new platform.

Digital Betting LLC received a Russian betting licence in March 2016 and is a member of the Self Regulatory Organisation of Russian Bookmakers.

The launch represents the first time that an international bookmaker has managed to establish itself in the Russian gambling sector, one of the most challenging gambling markets in the world. Russia's central media regulatory body, the Roskomnadzor, has blacklisted a number of gambling websites belonging to international operators, including 100 Bwin-related domains.

Bwin's launch in Russia brings the current roster of Russian-licensed online bookies to 15, joining Liga Stavok, 1xBet, Winline, Tennisi, Betcity, 888 (not the UK operator), Fonbet, Olympus, Baltbet, Leon, BingoBoom, PariMatch, Marathon and Zenit. ◀

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AC Q3 PROFITS UP

Atlantic City casinos grew third quarter operating profits by 20.7% to \$252.593m over last year. Year-to-date, hotel occupancy also rose 3.4% to 89.2%. Year-to-date casino revenue rose 1.5% while entertainment and other revenue rose 8%.

Combined, the two segments offset hotel room's 4.9% revenue decline and a 2.3% decline in food and beverage revenue.

Casinos	Operating Profit (m\$)	% Year-over-Year Change
Tropicana AC (TPCA)	\$46.211	+67.0
Golden Nugget (Landry's)	\$12.804	+15.4
Caesars (CZR)	\$29.087	+10.9
Bally's AC (CZR)	\$18.167	+10.7
Harrah's (CZR)	\$37.747	+0.9
Resorts	\$10.771	+0.3
Borgata (MGM/BYD)	\$81.843	- 0.4
Online Gaming		
Caesars	\$3.780	+55.4%
Resorts Digital	\$12.183	N/A
Total	\$252.593	+20.7%

US STOCK UPDATE

Below is a list of US gaming stocks that hit 52-week highs this week:

COMPANY	52-Week high as of Wednesday
Golden Entertainment	\$32.92
Everi	\$8.87
Wynn	\$158.57
Monarch Casino	\$46.48
Full House	\$3.72
Pinnacle	\$29.12
Penn National	\$27.83
TransAct	\$15.00
Scientific Games	\$52.50
Eldorado	\$29.65
Boyd	\$30.42
Red Rock Resorts	\$28.31



TRIALS AND TRIBULATIONS OF A GAMING START UP

HELEN WALTON | CCO, GAMEVY

WEEK FIVE: A BIG LAUNCH! AND THAT 'WHAT NEXT?' FEELING

Helen Walton is the CCO of Gamevy, a new online gaming provider. Having come from outside of the industry, she shares her triumphs and tribulations in navigating this unique market and building a business

Monday morning and our new product launches. This is astonishing because right up until mid-last week I wasn't sure the wretched thing would ever be bug-free.

It's a new fast-draw lottery that takes place every two and a half minutes, and it looks pretty damn good. Our aim was to enhance and build the brand by creating an instant experience that feels as entertaining as the weekly televised draw.

We use the same TV presenter and our artist has made the draw itself look absolutely superb – most people will be convinced the lottery machine is filmed, not illustrated. Of course, there are a bunch of features we wish we could improve, but the video creation and streaming on the fly was a massive challenge, which really showcases Gamevy's technical excellence. It was one of the hardest products we've ever built and I'm so proud of the team.

Also, The Health Lottery are supporting the launch with a major TV campaign. I may have once run multi-million pound ad campaigns, but since starting Gamevy my marketing budget has been under £100 per year. So I can't help but be thrilled to see a Gamevy product on TV!

We are all glued to our admin tools as we watch the first players come on and buy tickets. There's intense anxiety – will they buy more than one? Is staying for more than one draw a sign that they are enjoying it? We're also checking Return to Player looks correct and fretting in case of any unexpected problems in live...

But as time goes on and more ticket sales come in, I can't help but admit to a sense of anti-climax. The product is doing perfectly well, but it's a Monday morning – there are dozens of users not thousands – and no one has responded to my enthusiastic LinkedIn post or press-release.

I don't quite know what I'm expecting – a standing ovation from the entire industry? The front page of The Times? It reminds me how, as a child, the intense anticipation of Christmas Eve always meant that Christmas Day itself could never quite live up to my expectations.

Our indefatigable customer has no such concerns – he is delighted with the launch but has his eyes firmly fixed on phase 2. He has already sent me an email with the list of improvements and new features, prioritised and with a hoped-for launch date attached to them. I inwardly groan. I know my dev team need a really decent break. I am not brave enough to mention any new deadlines,

“OUR INDEFATIGABLE CUSTOMER HAS NO SUCH CONCERNS – HE IS DELIGHTED WITH THE LAUNCH BUT HAS HIS EYES FIRMLY FIXED ON PHASE 2”

so I take the coward's way and sneak the new features onto the Trello board 'for discussion'.

By the end of the week, Paul and I take a few minutes to extrapolate sales and come up with a healthy annual number. I point out that if the current rate of growth continued, we'd have taken over the world by next month... And that's it. A product that's been a year in the making – and we are already worrying about bugs and deadlines on the next one. There really never is a moment where we sit back and enjoy an achievement.

GUEST COLUMNIST:



WILL MACE
HEAD OF KINDRED
FUTURES

**MICHAEL
FRANKLIN**
OPEN
INNOVATIONS
MANAGER,
KINDRED
GROUP

**WHAT IF IBM
WATSON GAVE
RACING TIPS?
WOULD ASCOT
BECOME A CARPARK?**

*Will Mace and Michael
Franklin discuss the nightmare
scenario: Will the use of AI
ultimately sound the death knell
for the traditional gambling industry?*

As if the current political and media pressure wasn't enough of a threat, the gambling industry is coming under even more significant pressure from a far less obvious source.

So how does IBM Watson giving racing tips lead to Ascot becoming a carpark?

Dramatic it may seem, but in the context of the rapid growth of artificial intelligence (AI), some are predicting that a major shock to the betting industry is on the cards, with an equally significant shock for all the sports that rely upon it.

AI is of course the technology du jour and is being widely used to disrupt and reinvent whole industries: Everything from healthcare and humanitarian aid to retail and recruitment. Its current applications in the gambling industry are also well known; from Netflix style sportsbook recommendations to the identification of problem gamblers. It is a slightly different application however that could provide a major, even existential, shock.

THE DATA EXPLOSION

Data has long been the lifeblood of sports bettors and bookmakers alike. Every score, every shot and every pass has been recorded and used to create what were once considered quite sophisticated predictive models. There is however a rapidly increasing wealth of new data, or at least newly processable data, that is fuelling something of a revolution.

A few hundred data points in the predictive models of old are rapidly becoming a few million data points in the AI-powered predictive models of today. These new sources of data, and the techniques to process them, allow for the first time an algorithm to really read a game, to follow the ebb and flow and to identify shifts in momentum.

One very small example is that we can now remotely and in real time measure variables such as a player's pace, acceleration, and heart rate, identifying any signs of fatigue and accurately predicting the impact it will have on the rest of the game.

Millions of data points, per game, per fight or per race can be collected in real time, related to each other, related to known outcomes in every previous game, fight or race, and used to build highly accurate real-time predictive models based on a previously impossible number of correlated data points.

Ok, but where is the shock? How does this exponential improvement of predictive capability provide the shock to the gambling industry? Models have always existed, albeit usually the domain of fairly secretive betting syndicates, so how does 'simply' improving them, even exponentially, really change an industry?

The shock comes when the predictions become freely and easily available to all, when IBM Watson, or Google, or Facebook, or Amazon, or any of the new breed of AI-first companies, decide there is value in openly sharing their predictions - in the way that newspapers and blogs have always done.

What better way for Facebook to support their increasing sports-focussed content and streaming with a value-add service such as AI-powered predictions? Why would Google not want to add value to a search for the weekend's fixture list with an AI-powered outcome predictor?

THE LOGICAL DEMISE OF AN INDUSTRY?

So, AI powered predictive models based on millions of data points will become freely and easily available to all, creating a situation of absolute information parity between bookies and punters. Punters will have immediate access to better information than ever before and so will make better bets - or at least make bets on the outcomes the predictive models are forecasting.

In effect, every punter is now a wise guy. Punters will start to win more often, as their bets are based on data rather than flawed and limited human opinion. But bookies will have access to these prediction services too, so prices will shorten to reflect them, and shorten again as punter money floods in on those outcomes. Prices will quickly become highly unattractive and punters will, by and large, stop placing bets.

WHAT...? WOULD THEY? WHY...?

This is the crux of the hypothesis and rests upon an understanding of the different motivations for betting. Wise guys, deprived of any pretence of information superiority and faced with perfectly efficient markets, will stop betting as the value opportunities disappear.

The self-proclaimed sports expert, who bets in order to demonstrate their superior insight and expertise, will

also stop betting, knowing they are not and cannot be more insightful than the Google predictor engine in the long run. As will those who bet to add a little spice to a match they are watching; for there is very little spice in simply betting on a Watson prediction at incredibly short odds... and they would be surely crazy to bet against Watson.

Professor Ian McHale of the University of Liverpool, one of the creators of the Sports Analytics Machine said that: "The gambling industry has already seen a convergence of odds and mirroring of prices. If more accurate probabilities were made available and information parity existed across bookies and punters, this situation could only intensify and make it very difficult for professional bettors to make a living as the odds offered would be completely efficient.

"On the other hand, there will always be casual bettors willing to bet, just like there are always people playing lotteries, despite knowing the probability of success, and the odds offered perfectly."

So perhaps there is hope for the betting industry after all? After all there will always be the unfathomable decision or the lucky bounce that can turn all predictions on their head. Some punters would certainly choose to continue to bet – perhaps the Leicester City fan who believes their team can repeat their famous against-the-odds Premier League win, perhaps the romantic who likes the colour of the silk, or perhaps the diehard betting on the 'Hail Mary' pass actually coming off. But could these bettors be anything like enough to sustain the industry as we know it today - an industry that has grown use to double digit year-on-year growth?

These punters will be few and far between, as in the long run, betting against the data, against the always-learning, always-improving AI-powered predictive models, is only ever going to be a very minority sport; the realm of the reckless and foolhardy.

BUT WHAT ABOUT THE CARPARK?

Other than the odd Leicester City fan, much of the current volume in sports betting could dry up as many of the motivations for betting are rendered obsolete. Turnover and revenues will implode, betting shops will begin to close, and on-line operators will shrink. High profile shirt sponsorships will be scaled back

and it will start to be safe to watch sports on TV again, as the wall-to-wall gambling ad coverage will simply become unaffordable for a much-reduced industry.

The most significant impact, however, would be felt in the sports that are dependent on betting for their very

“WISE GUYS, DEPRIVED OF ANY PRETENCE OF INFORMATION SUPERIORITY AND FACED WITH PERFECTLY EFFICIENT MARKETS, WILL STOP BETTING”

existence. The most obvious example of this is horseracing, which, without betting, would very quickly cease to exist. The smaller tracks would close first, followed quickly by the more iconic tracks such as Ascot, Cheltenham and Aintree. Ascot in particular, sitting in prime commuter belt territory, would be sold off to the highest bidder, much of it most likely becoming a carpark for a Crossrail branch line.

AI: GOOD OR BAD?

On a macro level, the debate being driven by philosophers such as Max Tegmark and Calum Chace amongst others is very much open as to whether AI will be very good for humanity or very bad for humanity. The general consensus is that it could be either, depending on choices we make now and in the coming years.

On a more micro level there are certainly some very exciting applications of AI in the gambling industry, but there are almost always unforeseen consequences to big new capabilities such as this and they are absolutely worth exploring and debating now, as we have tried to do here.

The argument espoused here is very much up for discussion. We have certainly made a few big leaps and actually we have no idea if Ascot is in a good location to become a Crossrail carpark or not, but hopefully the point remains - many potential impacts are unknown and some of them could significantly change our industry.

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**JONAS
CEDERHOLM**
CEO, GAME
LOUNGE

**STAYING ON THE
RIGHT SIDE OF
REGULATION**

The affiliate industry has come under significant scrutiny in recent months. Jonas Cederholm, Game Lounge CEO, assesses how this vital part of the online gaming ecosystem can navigate the choppy waters

The battle for supremacy in the web-based sector has been ongoing ever since players spun the reels of the first online slot and played the opening hands of online poker. Making yourself heard and getting your message out there in a marketplace that is only going to get busier is a continual challenge. The birth of the affiliate sector came about as a means of pushing brands to the next level, increasing their prominence in the minds of players.

While affiliate marketing has unmistakably shaped the direction of the online industry, and proved a uniquely useful tool in driving the acquisition and retention of players, there is no doubt that it has found itself under increasingly concerted scrutiny in certain markets over recent months. A number of operator brands have found themselves in hot water over the actions of their affiliates, with inaccurate news stories placed on their partners' websites bearing the brunt of mainstream media criticism.

Following a strategic review that reportedly predated any recent controversy, Sky Betting and Gaming sought to avoid an issue entirely by bringing the curtain down on its affiliate programme, while Paddy Power Betfair issued a new "one strike" policy for its affiliates.

This added scrutiny has not been restricted to Britain, with the Belgian Chamber of Representatives approving a mandate for a new advertising standards code on gambling services in October 2017.

WHAT THIS MEANS FOR AFFILIATE NETWORKS

The growing regulatory scrutiny that the affiliate industry is facing means that affiliate networks must now be more alert than ever regarding the activities of their partners in regulated markets around the world. It is no good taking a "wait and see" approach to affiliate activity on the part of wider networks, especially with operators in countries such as the UK curtailing their programmes, increasingly wary of their regulatory culpability for any disreputable activity.

A step that all affiliate networks must take is placing dedicated staff, with oversight of their database, in constant direct contact with all their affiliate websites. It is paramount that all the information placed on an affiliate site is correct, and only through maintaining an active dialogue and close partnership with individual affiliate sites can the wider networks move their content strategies forward with confidence. Operators must also bear some of the responsibility, taking extra care and being more selective, in order to ensure the affiliate networks that they partner with are reputable and fully compliant with local regulations.

At Game Lounge, we currently operate more 300 websites, including SveaCasino.se, Suomicasino.com and NorgeKasino.com. We work hard to ensure that these websites are packed with fresh, interesting and accurate content, and this is going to be of even greater importance as the media focus on industry affiliate marketing continues to grow.

BUILDING ROBUST FOUNDATIONS

There is no denying that M&A activity has been one of the defining features of the overall landscape of online gaming in recent years, with a number of operators paying hundreds of millions of euros to tie the knot with rivals from across the entire sphere of online gaming.

This wave of consolidation has also made itself evident in the affiliate sector. Active acquisition strategies have become the hallmark of a number of branded networks in the last year or two, and there is no doubt that this can represent the backbone of a successful expansionary outlook, growing a network's reach in rapid fashion.

However, while there is a clear place for M&A across the industry, it is important that affiliate networks do not lose sight of the importance of maintaining strong foundations in the form of organic growth. Doing so can be of great importance in ensuring the overall network is less at risk from unexpected regulatory developments and operators curtailing their affiliate programmes, providing an added layer of financial protection that an M&A driven growth strategy can be less equipped to foster.

Ensuring that we maintain a robust bottom line through organic growth has always been a priority for Game Lounge. In our largest market of Sweden, alongside Finland and Norway, we have moved forward with purpose since we founded the company in 2011 to make sure we have strong foundations across all areas of the business, including both affiliate marketing and search engine optimisation. We are always assessing opportunities to build on these foundations in markets across the world, and it is on a bedrock of healthy organic growth that affiliate networks can look to grow their presence with complete peace of mind.