



Bonus Buy Finland – our position

Reference case number VN/27332/2023 (diaarinumero VN/27332/2023), c. *Rahapelilain 3 luku – Rahapelien toimeenpano*

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Play'n GO would like to take this opportunity to reiterate its steadfast opposition to the concept of "Bonus Buy" slot games, and to encourage Finnish lawmakers to ban them outright.

As a responsible game supplier, Play'n GO has refused to develop predatory "Bonus Buy" mechanics into our games. We believe that we owe a duty of care to our players and to wider society, and the presence of such mechanics in our industry is a blight, a blight that takes advantage of the most vulnerable amongst us.

We design our games with an "entertainment-first" mindset. We want players to view our content in the same way they would view a trip to the cinema or going out for a meal- yes, it will cost you money, but in return you should reasonably expect to enjoy yourself. Our games are designed to take players on a journey, to introduce them to characters and storylines, soundtracks and graphics, to *entertain them*. The joy comes from engaging with the game in a responsible, sustainable manner, for players to feel like they're getting value for their hard-earned money when they choose to spend their expendable income engaging with our content.

Sustainability is at the heart of what we do and "Bonus Buy" mechanics thieve players of that entertainment factor and ruin the overall gaming experience. Sustainability is at the heart of what we do and Bonus Buy games are actively working against having a thriving, sustainable and responsible industry. It is not "sustainable" for players to engage in a predatory mechanic in the long-term. As our study below shows, the general public wants to see "Bonus Buys" outlawed from the iGaming landscape forever. We not only respect this public opinion- we firmly endorse it and call for Finnish legislators to do the same. While "Bonus Buy" games would no doubt be commercially successful for Play'n GO, we value our position as a responsible, player-first supplier above quick, easy cash that's made from vulnerable players in a dishonest way.

We firmly believe that so-called 'bonus buy' games are in contravention to a sustainable industry, and they should be excluded from a regulated Finnish market.

So called 'Bonus Buy' games allow players to buy directly into the bonus or free spins round of a slot game, in many cases for hundreds of times more than their initial stake for a single spin. In recent weeks, one supplier has introduced an 8000x bonus buy round. A 20c stake would equate to a single €1600 "Bonus Buy" spin.

Actively encouraging players to buy in at what is now up to 8000x their stake is a direct violation of our ethos at Play'n GO, banned by leading regulators such as the UKGC in the UK and KSA in the Netherlands and will, we believe, cause lasting harm to our industry on a wider scale.

[Games warning for online operators \(gamblingcommission.gov.uk\)](https://gamblingcommission.gov.uk)

As mentioned above, earlier this year we funded a study to test the mood of the public on this issue, and were pleased to have our beliefs vindicated. Below, you will see precisely what the gaming public feel about "Bonus Buy" mechanics. Swedish players, and the general public in Sweden, were in firm

agreement that such games have no place in Swedish society. You can find the results of the study below.

<https://www.playngo.com/news/swedish-slot-players-think-bonus-buy-games-should-be-banned>

Commenting on the overwhelming support in Sweden for the prohibition of 'Bonus Buy' slot games upon the study's release earlier this year, Johan Törnqvist, CEO and Co-founder of Play'n GO, said: *"Play'n GO has been a consistent and vocal advocate for a sustainable, regulated, and thriving gaming industry that is based around an 'entertainment-first' mindset for many years.*

"I pledged as far back as 2021 that Play'n GO would never make a Bonus Buy game – a decision that has cost us hundreds of millions of Swedish Krona – but I stand by that decision. Bonus buy games are harmful to players, and to the long-term health and sustainability of the entire industry, and they should be excluded from the regulated Swedish market." This sentiment is replicated for the Finnish market.

As this consultation period draws to a close ahead of the regulation of the Finnish market, we strongly recommend that regulators closely examine this predatory mechanic, and weigh up its position in the industry against the long-term sustainability of iGaming in Finland. We need to ensure that players have the ability to enjoy their experience with online casino gaming, in a safe manner as well as an entertaining one.

'Bonus Buy' games have no place in regulated gaming and should be banned from Finland.