

**Follow-up Committee on Manipulation
of Sports competitions
(T-MC)**

Council of Europe Convention on the
Manipulation of Sports Competitions
(CETS No. 215)



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Monitoring of the implementation of the Convention - Assessment of Norway

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I. Introduction

In 2014, Norway became one of the first countries to sign the Council of Europe Convention on the Manipulation of Sports Competitions (CETS No. 215, hereinafter “the Convention”) and was the first to ratify it, thereby initiating the Convention's ratification process.

Norway was also selected as the first country to undergo monitoring of the Convention's implementation.

This monitoring was based on the principles set out in the Convention Monitoring Strategy 2024–2027 (Appendix, paragraph 2, “Provisions to be monitored”), which states:

“The T-MC may decide to select all the provisions to carry out an overall assessment of the implementation of the Convention.

(...)”

Monitoring was conducted on the basis of an examination of the pertinent legal acts and relevant documents, in particular:

- The Constitution of the Kingdom of Norway, LOV-1814-05-17, consolidated FOR-2024-06-07-928 as of 21 May 2024;
- The European Convention on Human Rights, in effect since 3 September 1953;
- The European Convention on Mutual Assistance in Criminal Matters, in effect since 12 June 1962;
- The EU General Data Protection Regulation (GDPR), in effect since 25 May 2018;
- The Personal Data Act, LOV-2018-06-15-38, consolidated LOV-2021-06-18-124 as of 1 January 2022;
- The Gambling Act, LOV-2022-03-18-12, in effect since 18 March 2022;
- The Penal Code, LOV-2005-05-20-28, consolidated LOV-2019-06-21-52 as of 1 January 2020;
- The Criminal Procedure Act, LOV-1981-05-22-25, consolidated LOV-2024-05-31-25 as of 1 July 2024;
- The Anti-Money Laundering Act, LOV-2018-06-01-23, consolidated LOV-2022-12-16-91 as of 1 July 2023;
- The National Action Plan against Match-Fixing in Sport, 2013–2015;
- The Strategy Plan 2025–2028 on Combating the Manipulation of Sports Competitions;
- Assignment Letters on the Establishment of a National Platform, 2015 and 2018;
- Report of the Evaluation Visit in Norway on the European Sports Charter, EPAS(2018)26.

II. Assessment

Chapter I - Purpose, guiding principles and definitions (Art. 1-3)

Observations

The purpose of the Convention is to combat the manipulation of sports competitions in order to protect the integrity of sport and sport ethics, in accordance with the principle of the autonomy of sport.

The issue of the integrity of sport, or sport in general, is not explicitly addressed in the Constitution of the Kingdom of Norway (hereinafter “the Constitution”). However, Article 2 of the Constitution indirectly supports the objectives of the Convention by referring to the principles of democracy, the rule of law, and human rights. The concept of integrity is mentioned in relation to the protection of personal integrity, particularly that of children, as set out in Articles 102 and 104 of the Constitution, respectively.

In Norway, sport is largely not regulated by national legislation. Nevertheless, the autonomy and self-governance of sports organisations is a fundamental principle of the national sports policy. The right of

sports organisations to define and prioritise their own objectives, and to adopt and enforce their own rules and regulations within the framework of public law, is respected by public authorities. Among other priorities, ethics, preventive anti-doping measures, and efforts to combat the manipulation of sports competitions are considered essential to good governance, which is a prerequisite for receiving state funding. For example, the statutes of the Norwegian Olympic and Paralympic Committee and Confederation of Sports (NIF) include specific provisions concerning doping and the manipulation of sports competitions.

The fight against the manipulation of sports competitions, as defined in the Convention, shall ensure respect for the following principles:

- a. Human rights;
- b. Legality;
- c. Proportionality;
- d. Protection of private life and personal data.

The Constitution contains an entire chapter dedicated to human rights (Chapter E, “Human Rights”). Article 92 stipulates that the authorities of the State shall respect and ensure human rights as expressed in the Constitution and in the human rights treaties binding on Norway. In addition, Article 93 guarantees the right to life and prohibits torture, slavery, forced labour, and other forms of inhuman or degrading treatment.

Norway, along with 45 other countries forming the Council of Europe, is a party to the European Convention on Human Rights (hereinafter “ECHR”), which is binding on the Kingdom of Norway. The ECHR established the European Court of Human Rights (hereinafter “the Court”), which aims to protect individuals from human rights violations. Any person whose rights under the ECHR have been violated, including by the Kingdom of Norway, may bring a case before the Court.

The principles of legality and proportionality are clearly addressed in the Constitution. For instance, Article 98 provides that “All people are equal under the law. No human being must be subject to unfair or disproportionate differential treatment.”

The Constitution also provides for the protection of private life through the following provision: “Everyone has the right to the respect of their privacy and family life, their home and their communication. Search of private homes shall not be made except in criminal cases” (Article 102, paragraph 1).

Respect for privacy and compliance with data protection regulations are of particular importance in matters related to sports integrity. The applicable legal framework, notably Article 8 of the ECHR, guarantees the right to respect for private life. Together with the EU General Data Protection Regulation (hereinafter “GDPR”), it provides general guidance, which requires specific interpretation in the context of the sports sector and the management of sports integrity. Article 1, paragraph 2, of the GDPR states that it “protects fundamental rights and freedoms of natural persons and in particular their right to the protection of personal data.” In parallel, the Norwegian Personal Data Act provides a comprehensive legal framework for the protection of personal data.

The Norwegian legal system does not currently include the definitions set out in the Convention, in particular: “sports competition,” “sports organisation,” “competition organiser,” “manipulation of sports competitions,” “sports betting,” “illegal sports betting,” “irregular sports betting,” “suspicious sports betting,” “competition stakeholder,” “athlete,” “athlete support personnel,” “official,” and “inside information.”

The National Action Plan Against Match-Fixing in Sport 2013–2015 defines match-fixing as the manipulation of a sporting event by parties seeking economic advantage. This definition is intended to encompass traditional match-fixing—manipulating the final result—spot-fixing, which involves manipulation of specific events within a competition, and point-shaving, where the score is deliberately kept lower. Match-fixing is described as the manipulation of a sporting competition by actors involved (athletes, coaches, managers, referees, etc.) who aim to influence the outcome or specific aspects of the competition for financial gain for themselves or others.

Best practices

The Norwegian National Action Plan Against Match-Fixing in Sport 2013–2015 set out the primary objective of preventing, uncovering, and responding to match-fixing in sport by developing and disseminating relevant knowledge. This Action Plan marked the beginning of a more structured and targeted approach to addressing match-fixing in sport. The recently adopted Strategy Plan 2025–2028 reaffirms this objective, aiming to prevent, detect, and respond to the manipulation of sports competitions.

The Ministry of Culture and Equality is currently working on a proposal for new legislation concerning anti-doping in sport and the fight against the manipulation of sports competitions. The purpose of the proposed law is to enhance anti-doping efforts and combat the manipulation of sports competitions in order to protect the integrity of sport, in line with international obligations. It is intended that the law will explicitly refer to the Convention as the international legal framework for action in this area.

Recommendations

In the context of the self-governance and self-regulation of sports organisations, it is recommended to elevate the priority given to the fight against the manipulation of sports competitions by broadening and deepening the integrity of sport approach. The forthcoming law on anti-doping in sport and combating the manipulation of sports competitions could play a key role in supporting and encouraging sports organisations in this regard, as well as in facilitating their work in the field of anti-manipulation of sports competitions.

Furthermore, the new law could promote the application of the definitions set out in Article 3 of the Convention by directly referring to the Convention as the international legal framework for action in this field. Such a reference would imply that the definitions outlined in the Convention apply within the scope of the national legal framework.

Chapter II - Prevention, co-operation and other measures (Art. 4-11)

Observations

For the sake of efficient domestic coordination, it is crucial to establish the necessary legal and organisational instruments. Inclusive measures in the areas of sports integrity, sports betting, the fight against corruption, money laundering, cybercrime, and the governance of sports organisations are particularly important.

It is also essential to define and assign specific tasks and responsibilities to the relevant public authorities, ensure the effective execution of coordination measures, and monitor progress. Ideally, a single organisation should be entrusted with coordinating the actions of the public authorities involved in the fight against the manipulation of sports competitions.

The Norwegian Gaming Authority monitors the risk management systems established by Norsk Tipping AS in connection with match-fixing, risk behaviour, and irregularities committed by commissioners. Its activities are planned according to a risk and materiality assessment based on real-time information on betting activities provided by Norsk Tipping AS. This risk-based supervision allows the Norwegian Gaming Authority to make a valuable contribution to preventing match-fixing by closely monitoring the procedures and control measures implemented by the Norsk Tipping AS.

As such, the Norwegian Gaming Authority is tasked with overseeing the implementation of betting regulations, including those concerning sports betting, and applying relevant measures to combat the manipulation of sports competitions in relation to sports betting. The Norwegian Gaming Act contains both direct and indirect references to these functions. Notably, the Norwegian Gaming Authority was officially mandated to operate as the national platform for combating the manipulation of sports competitions for a four-year period starting on 1 July 2015. The national platform was permanently established at the Norwegian Gaming Authority on 1 June 2018.

The National Action Plan Against Match-Fixing in Sport 2013–2015 states that Norsk Tipping AS is authorised to regulate betting objects. Its IT infrastructure for sports betting provides enhanced tools for regulating the maximum size of bets based on the type of sport, league, betting object, and outcome. The objective is to control the size of the betting pool and assess the risk of irregularities for each betting object.

Risk assessments conducted up to 2022 indicate that the threat of match-fixing in Norwegian sports is closely linked to the size of the betting market, particularly the offshore and illegal betting markets. Only football and tennis are identified as having an elevated risk of match-fixing; for other sports, the betting markets are relatively limited.

In Norway, governance vulnerabilities are considered low due to the strong position of the Norwegian Olympic and Paralympic Committee and Confederation of Sports (NIF) and its close relationship with various sports organisations. Financial vulnerabilities are also low, given the limited presence of private ownership and foreign sponsors in Norwegian sport. While oversight mechanisms are largely informal, they are deemed adequate in light of the current threat level of match-fixing.

Regarding the relevant legislative and other measures, the NIF has adopted the International Olympic Committee's rules prohibiting betting on one's own competitions and the sharing of inside information. As the sports associations under the NIF umbrella are, in most cases, also the competition organisers, these rules apply uniformly across the sports landscape.

Norsk Tipping AS — the sole legal sports betting operator in Norway — has established a comprehensive policy on match-fixing. This includes conducting risk assessments when introducing new betting markets, sports, or types of bets; mandatory training for employees involved in sports betting and for Norsk Tipping AS commissioners (kiosks); and the obligation to report actual or suspected cases of match-fixing by customers to the Norwegian Gambling Authority. Norsk Tipping AS continuously evaluates betting objects to determine which events should be made available for betting. It has also undertaken a general assessment of the sports and levels of competition it offers for betting.

According to Chapter 3, Section 11 of the Norwegian Gaming Act, Norsk Tipping AS is a state-owned company whose shares are not tradable. Its purpose is to facilitate responsible gambling and prevent the harmful effects of gambling, in line with the law. The company is to be operated efficiently to ensure that as much of its gaming revenue as possible is allocated to public interest purposes, including sport.

State-owned Norsk Tipping AS and Norsk Rikstoto dominate the regulated gambling market in Norway. Norsk Tipping AS holds the exclusive rights to gaming machines, betting, and various lottery games, while Norsk Rikstoto has a monopoly on totalizator betting and may also offer its services online.

Chapter 6, Section 32 of the Norwegian Gaming Act sets out measures for rectifying illegal behaviour and shutting down unlawful activities in the event of a breach of the Act or decisions issued under it. The Norwegian Gaming Authority may order the responsible party to correct the unlawful situation or mandate that the illegal activity be ceased or closed down.

More specifically, Sections 32 to 37 provide for a range of enforcement measures, including the blocking of websites offering unauthorised gambling, the imposition of coercive fines, the revocation of licences or approvals (in which case the Authority determines how the affected gambling activities are to be discontinued), suspension of payments and refunds, infringement fees, fines, and imprisonment for up to one year for offering or assisting in offering gambling without a licence.

Serious offences are punishable by fines or imprisonment for up to three years. In assessing the seriousness of an offence, particular weight is given to whether the act involves a substantial amount of money, targets children, is repeated or prolonged, or is otherwise deemed particularly harmful.

The illegal sports betting market in Norway is estimated by Norsk Tipping AS and CK Consulting to amount to approximately €70 million.

Best practices

Within the framework of the National Action Plan Against Match-Fixing in Sport 2013–2015, the importance of cross-sectoral action was clearly recognised, and the exchange of information between stakeholders was identified as an essential function. The Action Plan was the result of domestic co-operation among the Norwegian Olympic and Paralympic Committee and Confederation of Sports, the Football Association of Norway, Norsk Tipping AS, the Norwegian Gaming and Foundation Authority, the Ministry of Justice and Public Security, and the Ministry of Culture.

The recently adopted Strategy Plan 2025–2028 broadens the scope of collaboration, involving a wider range of stakeholders. These include the Norwegian Olympic and Paralympic Committee and Confederation of Sports (NIF), the Norwegian Football Association, the Norwegian Trotting Association, Norsk Tipping AS, Norsk Rikstoto, the Norwegian Gaming and Foundation Authority, and the police through the National Authority for Investigation and Prosecution of Economic Crime, along with the Ministry of Culture and Equality.

This new four-year strategy to combat match-fixing clearly defines the roles and responsibilities of key actors such as law enforcement, sports bodies, and betting companies. It promotes data sharing, coordinated risk assessment, and increased public awareness as fundamental elements of a unified national response.

Overall, the Norwegian Gaming Authority is responsible for coordinating efforts to combat the manipulation of sports competitions in Norway. As previously outlined, the Authority was legally mandated to operate as the national platform for this work for a four-year period beginning on 1 July 2015. The decision to make this role permanent was based on an evaluation of the national platform's performance during the project period. As a result, the Norwegian national platform was permanently established at the Norwegian Gaming Authority on 1 June 2018.

The Ministry of Culture and Equality is currently working on a proposal for new legislation concerning anti-doping in sport and the fight against the manipulation of sports competitions. The intention is to formally anchor the responsibilities of the national platform, assigning domestic coordination as one of its core duties.

The ongoing state initiatives include relevant risk assessments in which sports organisations and competition organisers are actively involved. The methodology applied in these assessments follows recognised approaches developed by Australian law enforcement authorities. The risk assessments take into account the size and volume of the betting market, the threat posed by organised crime groups, as well as the quality of governance, oversight, and financial management mechanisms.

In addition, co-operation with ULIS, which monitors odds movements and other events in Norwegian sports competitions, supports and strengthens the risk assessment processes across a broad range of sports disciplines in Norway.

The Strategy Plan 2025–2028 emphasises preventative efforts and highlights the need to map attitudes and knowledge about the manipulation of sports competitions among sports actors. These assessments provide valuable insights into the vulnerabilities of different sports to potential manipulation and enable comparisons of threat levels across various disciplines. Ideally, risk assessments are to be conducted for all relevant Norwegian sports every two years.

Regarding education and awareness-raising, thematic seminars and training sessions have been regularly organised by key stakeholders — including the Norwegian Gaming Authority, the NIF, the Norwegian Football Association, and Norsk Tipping AS — for athletes, referees, and coaches, accompanied by the distribution of relevant educational materials.

For example, an e-learning module is available on the NIF website and is accessible to all members of NIF. Additionally, some sports organisations have integrated education on the manipulation of sports competitions into their mandatory training programmes, such as coach education schemes. Several stakeholders within the national platform have also included thematic seminars as part of their referee

training. Furthermore, all athletes participating in the Olympic and Paralympic Games receive training on the rules and regulations related to the manipulation of sports competitions.

NIF has adopted the Olympic Movement Code on the Prevention of the Manipulation of Competitions. As a result, the regulations issued by NIF apply to all sports federations and their members, taking precedence over any specific rules set by individual federations. Competition organisers are likewise subject to NIF's regulations. Accordingly, all member organisations of NIF have fully adopted the rules concerning the prevention of competition manipulation. The responsibility for implementing these rules within each sport lies with the respective sports organisations. Breaches of the rules are predominantly sanctioned through time-limited suspensions.

The government provides annual general funding to Norwegian sports organisations. In line with the principle of keeping an arm's length distance, this funding is not earmarked for specific purposes, including efforts to combat match-fixing. In 2025, NOK 930 million was allocated as a general contribution from the state to sports organisations. It is expected that, within this framework, sports organisations will take the necessary measures to combat the manipulation of sports competitions and meet the obligations of the Convention.

According to Section 12, paragraph 5 of the Gaming Act, 64% of Norsk Tipping AS's gaming profits are allocated to sports purposes.

Recommendations

It is recommended to permanently revise and enhance existing domestic co-ordination mechanisms and organisational instruments — including progress measurement tools — with the clear objective of effectively addressing the manipulation of sports competitions in response to evolving needs.

More broadly, it is essential to ensure that all initiatives and measures are continuous, comprehensive, regularly updated, and permanently embedded in practice. The following recommendations may be considered:

- Ensure that both the sport and gambling regulatory frameworks explicitly address the specific risks related to the manipulation of sports competitions. Risk assessments should be regularly updated and renewed, reflecting changes in the risk landscape due to new types of betting objects and evolving gambling conditions.
- Permanently strengthen awareness-raising, education, training, and research efforts in the fight against the manipulation of sports competitions, involving all stakeholders, including sports organisations outside NIF.
- Monitor the implementation of rules aimed at combating the manipulation of sports competitions, as well as the application of good governance principles, across all sports organisations and competition organisers authorised to operate in Norway.
- Consider the relationship between state funding and the performance of sports organisations in the area of anti-match-fixing, evaluating whether funding allocation could reflect the effectiveness of measures taken in this field.

Chapter III - Exchange of information (Art. 12-14)

Observations

As previously outlined, the Norwegian Gaming Authority was legally tasked with operating as the national platform in Norway for combating the manipulation of sports competitions for a four-year period starting on 1 July 2015. The national platform was permanently established at the Norwegian Gaming Authority on 1 June 2018.

The functions of the Norwegian national platform are carried out by the Norwegian Gaming Authority in co-operation with the Norwegian Olympic and Paralympic Committee and Confederation of Sports (NIF), the Horse Racing Authority, the Norwegian Football Association, the Norwegian Trotting Association, the Ministry of Culture and Equality, Norsk Tipping AS (sports betting), Norsk Rikstoto (horse race betting), and the National Authority for Investigation and Prosecution of Economic and Environmental Crime. Efficient coordination is ensured through joint efforts to prevent and detect match-fixing in Norway.

Relevant coordination meetings are held twice a year. In addition, close co-operation with NIF is maintained through regular meetings. Co-operation agreements are also in place with ULIS and IBIA, allowing for the receipt of alerts concerning irregular betting activities.

The GDPR and the Norwegian Personal Data Act comprehensively regulate the protection of personal data and apply across all sectors. These regulations are fully aligned with the provisions of Article 14 of the Convention. However, the sport sector and the integrity domain require specific interpretation to ensure effective implementation within their unique context.

Chapter 3, Section 16 of the Norwegian Gaming Act, titled "Processing of personal data," provides that monopoly providers may process necessary personal data, including special categories of data as referred to in Article 9 of the GDPR. This processing is permitted in order to monitor customers' gambling behaviour, with the aim of preventing the negative consequences of gambling and ensuring that gambling is conducted in a responsible and safe manner.

Best practices

Overall, sporting bodies and betting operators have agreed to report suspicious activities to the Norwegian Gaming Authority. Law enforcement and government agencies have committed to intervene when necessary. Joint efforts are also planned to include public awareness campaigns and regular risk assessments to monitor emerging threats.

The exchange of information between stakeholders is primarily conducted through encrypted channels, such as encrypted emails or password-protected documents.

The national platform for combating the manipulation of sports competitions in Norway has been legally granted special permission to process sensitive personal data. Norway is currently in the process of adopting separate legislation to establish a clear legal basis for the processing of personal data for the purpose of combating the manipulation of sports competitions. This legislation will apply to public authorities and all relevant organisations engaged in such data processing, in accordance with the data protection principles set out in the GDPR, including the principle of data minimisation, while safeguarding the fundamental right to privacy of data subjects.

Recommendations

It is important to continuously revise and enhance existing co-operation and information-sharing mechanisms, including ensuring the measurement of their effectiveness.

The adoption of a new law could significantly facilitate the processing of personal data for the purpose of combating the manipulation of sports competitions.

Chapter IV - Substantive criminal law and co-operation (Art. 15-18)

Observations

The Convention requires each Party to ensure that its domestic laws allow for the criminal sanctioning of the manipulation of sports competitions when such acts involve coercive, corrupt, or fraudulent practices, as defined by national legislation.

The drafters of the Convention have identified criminal liability as the ultima ratio remedy, to be applied in the most serious cases of manipulation of sports competitions.

Norway does not have a specific anti-match-fixing law. The Norwegian legal framework does not explicitly criminalise the manipulation of sports competitions. However, existing anti-corruption, anti-fraud, and anti-financial misconduct laws could be applied in cases involving manipulation.

In jurisdictions lacking specific legislation targeting the manipulation of sports competitions, general legal provisions have often been used to address the issue.

An analysis of the Norwegian criminal law framework indicates that, in the absence of a dedicated legal provision, various sections of the Penal Code may be applied — often in combination — to investigate and prosecute criminal cases related to the manipulation of sports competitions. As such, the criminal aspects of manipulation may be punishable under the relevant sections of the Penal Code (see Appendix 1).

Article 15 of the Convention does not impose an obligation to criminally sanction the manipulation of sports competitions unless coercive, corrupt, or fraudulent practices are involved.

Depending on the jurisdiction and the country's legal traditions, both paths can be effective. One option is to criminalise the manipulation of sports competitions. Another is to rely on general criminal law provisions, such as fraud, bribery, or corruption. The use of special investigation techniques, along with strong and persuasive case law, can serve as key arguments when determining the most favourable path.

The laundering of proceeds linked to the manipulation of sports competitions may be prosecuted as a criminal offence. Sections 332–336 of the Penal Code set out the conditions for receiving proceeds from crime, while Sections 337–341 define various forms of money laundering and the corresponding penalties. These provisions could apply to the manipulation of sports competitions when committed intentionally or involving aiding and abetting.

According to Section 15a of the Penal Code, penal provisions also extend to any person who contributes to the commission of a criminal offence, unless stated otherwise. Thus, aiding and abetting are punishable in the same manner as the completed offence.

The Money Laundering Act may also be relevant to the manipulation of sports competitions, particularly regarding the obligations of sports betting operators to conduct customer due diligence.

An examination of Chapter 4 of the Penal Code, Sections 27–28 on “Enterprise penalties,” shows that corporate liability is recognised in Norwegian criminal law. These provisions allow the liability of legal persons to be engaged for their involvement, contribution, or assistance in acts related to the manipulation of sports competitions.

Recommendations

It is recommended to assess the validity and the operational efficiency of the current criminal law framework. This requires examining the practical implementation of the relevant legal provisions. It also requires evaluating the capacity and effectiveness to develop the pertinent case law. In addition, law enforcement representatives — including pre-trial investigators, prosecutors, and judges — should receive specific training on the phenomenon. They should also be provided with clear guidelines on the application of the relevant criminal law provisions and on the efficient handling of match-fixing cases.

Chapter V - Jurisdiction, criminal procedure and enforcement measures (Art. 19-21)

Observations

The requirement to establish jurisdiction over the offences referred to in Articles 15 to 17 of the Convention is fulfilled. Chapter 1 of the Penal Code, “Application of the criminal legislation,” along with its respective provisions, serves this purpose.

Relevant aspects of seizure during investigations, including the handling of electronic evidence, are regulated under Chapter 16 of the Criminal Procedure Act. When offences related to the manipulation of sports competitions are investigated under general criminal provisions — such as fraud or corruption — it is possible to seize devices and data sources such as phones, computers, email accounts, and cloud storage. The main investigative challenge often lies in accessing evidence when communications occur in encrypted chat groups hosted by service providers that do not cooperate with law enforcement.

An examination of the Norwegian legal framework suggests that there are no provisions specifically tailored to the protection of whistle-blowers in cases involving the manipulation of sports competitions. Nevertheless, law enforcement authorities are authorised to apply general protective measures during investigations and judicial proceedings. Whistle-blowers are protected under national procedures through existing witness protection mechanisms and data protection regulations.

The Norwegian police can implement a witness protection programme when necessary, and it is possible to provide information anonymously via the police website. Individuals may also speak with police officers specialised in handling information from persons wishing to remain anonymous in a criminal case. Section 130 of the Criminal Procedure Act regulates the use of anonymous witness statements in court for certain types of crimes, including money laundering, which may be relevant in cases involving manipulation of sports competitions. Additionally, NIF provides a channel for submitting anonymous notifications.

Recommendations

It is recommended to monitor the application of the pertinent legal provisions with the aim of assessment of the relevant efficiency.

Chapter VI - Sanctions and measures (Art. 22-25)

Observations

The Norwegian national legal framework allows for the criminal sanctioning of the manipulation of sports competitions when such conduct involves coercive, corrupt, or fraudulent practices.

Criminal offences related to the manipulation of sports competitions, when committed by natural persons, are subject to effective, proportionate, and dissuasive criminal sanctions. These may include monetary penalties, community service, arrest, restriction or deprivation of liberty, imprisonment, and the loss of certain rights. Disciplinary sanctions may also be imposed on natural persons and can include suspension, fines, forfeiture of advantages gained, loss of position, loss of the right to host sporting events, and loss of membership.

Legal persons may be held corporately liable and are subject to effective, proportionate, and dissuasive sanctions. These may include monetary penalties as well as temporary or permanent disqualification from engaging in commercial activities.

The applicable legal framework also permits the seizure and confiscation of proceeds and property related to criminal offences, including those connected to the manipulation of sports competitions. Section 74 of the Penal Code sets out the general rules for the confiscation of proceeds and property that do not belong to the offender. Additional provisions governing seizure and confiscation are found in Chapter 16 of the Criminal Procedure Act.

Recommendations

It is recommended to monitor the application of sanctions with the aim of assessment of their deterrence effect.

Chapter VII - International co-operation in judicial and other matters (Art. 26-28)

Observations

Norway is a party to international treaties on extradition and mutual assistance in criminal matters, which are applicable, inter alia, to offences related to the manipulation of sports competitions. The legal basis for co-operation with international bodies such as UNODC, Interpol, and Europol is well established. For example, Norway has been a party to the European Convention on Mutual Assistance in Criminal Matters (ETS No. 030) since 1962.

Best practices

The National Action Plan Against Match-Fixing in Sport 2013–2015 identified international co-operation as essential for the investigation, prosecution, and judicial proceedings related to criminal offences involving the manipulation of sports competitions. The newly adopted Strategy Plan 2025–2028 on combating the manipulation of sports competitions further prioritises enhanced international information exchange and stronger connections among relevant international stakeholders.

The Nordic betting supervisory authorities have established a working group on match-fixing, led by the Norwegian Gaming Authority. Accordingly, the Norwegian national platform coordinates this Nordic working group. The platform also plays an active role in international forums, notably through participation in the Group of Copenhagen. The Norwegian police are involved in the MARS network, and both Norsk Tipping AS and the Norwegian Gaming Authority are authorised to engage in international co-operation efforts to combat match-fixing. The Norwegian police and prosecuting authorities contribute to international co-operation within the framework of their respective organisations.

With regard to support for third States, Norway has provided assistance through Council of Europe programmes such as KCOOS+ and ACT, aimed at supporting the fight against the manipulation of sports competitions and strengthening prevention efforts. Norway is among the key contributors to both projects.

In addition, Norwegian sports associations actively participate in the fight against match-fixing within the framework of their respective international federations. For example, there is ongoing and regular co-operation with major international sports organisations, including the IOC, FIFA, and UEFA.

Recommendations

It could be recommended to revise and update the existing mechanisms for international co-operation in the areas of investigation, prosecution, and judicial proceedings concerning offences related to the manipulation of sports competitions. Furthermore, co-operation with international sports organisations in the fight against the manipulation of sports competitions could be further developed and expanded.

III. Conclusion

In view of the foregoing, the T-MC considers that the Norwegian legislation potentially applicable in the context of the manipulation of sports competitions is generally in line with the principles giving effect to the Convention.

Overall, it is important to ensure that all initiatives and measures remain continuous, comprehensive, up-to-date, and permanently embedded in practice.

The T-MC remains at the full disposal of the national authorities to support and assist them in the implementation of the Convention's provisions, including in the implementation of the recommendations contained in this report:

- Elevating the priority of combating the manipulation of sports competitions and ensuring that the new law supports this effort by aligning with the Convention's definitions (Recommendation 1).

- Continuously improving coordination mechanisms, ensuring updated risk assessments, enhancing education and monitoring, and considering the possibility of linking state funding to anti-match-fixing performance (Recommendation 2).
- Strengthening co-operation and information-sharing mechanisms and adopting legislation to facilitate the lawful processing of personal data for anti-manipulation purposes (Recommendation 3).
- Ensuring that proportionate sanctions are efficiently applied to address both betting-related and non-betting-related manipulation of sports competitions (Recommendation 4).
- Updating international co-operation mechanisms and further strengthening collaboration with international stakeholders in combating manipulation in sport (Recommendation 5).

Appendix 1 - Relevant sections of the Penal Code

Fraud (section 371)

A penalty of a fine or imprisonment for a term not exceeding two years shall be applied to any person who with intent to obtain an illicit gain for himself/herself or others:

- a. causes, strengthens or exploits a mistaken belief and thereby deceives someone into doing or omitting to do something by which someone suffers a loss or risks of loss, or
- b. makes use of false or incomplete information, modifies data or a computer system, uses a credit or debit card which belongs to another person, or otherwise illicitly affects the result of automated data processing, thereby causing someone a loss or risk of loss.

Aggravated fraud (section 372)

Aggravated fraud is punishable by imprisonment for a term not exceeding six years. In determining whether the fraud is aggravated, particular weight shall be given to whether:

- a. it resulted in considerable financial damage,
- b. it resulted in a loss of welfare or risk to life or health,
- c. it was committed on multiple occasions or over an extended period of time,
- d. it was committed by multiple persons acting together or shows signs of being systematic or organised,
- e. the offender purported to hold or abused a position, office or assignment,
- f. false accounts or accounting documentation have been kept or prepared, or
- g. the offender misled the public or a wider circle of persons.

Corruption (section 387)

A penalty of a fine or imprisonment for a term not exceeding three years shall be applied to any person who:

- a. for himself/herself or others demands, receives or accepts an offer of an improper advantage in connection with the conduct of a position, an office or performance of an assignment, or
- b. gives or offers any person an improper advantage in connection with the conduct of a position, an office or performance of an assignment.

Aggravated corruption (section 388)

Aggravated corruption is punishable by imprisonment for a term not exceeding 10 years. In determining whether the corruption is aggravated, particular weight shall be given to whether the act:

- a. was carried out by or toward a public official or any other person by violating the special trust attached to his position, office or assignment,
- b. whether it resulted or could have resulted in a considerable financial advantage,
- c. whether there was a risk of considerable harm of a financial or other nature, and
- d. whether false accounting information was recorded or false accounting documentation or false annual accounts were prepared.

Trading in influence (section 389)

A penalty of a fine or imprisonment for a term not exceeding three years shall be applied to any person who:

- a. for him/herself or others demands, receives or accepts an offer of an improper advantage in return for influencing the conduct of another person's position, office or performance of an assignment, or
- b. gives or offers any person an improper advantage in return for influencing the conduct of another person's position, office or performance of an assignment.

Breach of financial trust (section 390)

Any person who acts against another person's interests which he/she manages or supervises, with intent to obtain an illicit gain for him/herself or others or to cause harm, shall be subject to a fine or imprisonment for a term not exceeding two years.

(...)

Aggravated breach of financial trust (section 391)

Aggravated breach of financial trust is punishable by imprisonment for a term not exceeding six years. In determining whether the breach of financial trust is aggravated, particular weight shall be given to the factors specified in section 388, second sentence.

Coercion (section 251)

A penalty of a fine or imprisonment for a term not exceeding two years shall be applied to any person who by criminal or other wrongful conduct or by threatening with such conduct forces a person to perform, submit to or omit to do an act.

Any person who by threatening to make an accusation or to make a report to the police about a criminal act or to put forward harmful information or a defamatory allegation illegally forces a person to perform, submit to or omit to do an act, shall be subject to a penalty of a fine or imprisonment for a term not exceeding one year.

Aggravated coercion (section 252)

Aggravated coercion is punishable by imprisonment for a term not exceeding six years. In determining whether the coercion is aggravated, particular weight shall be given to whether it was committed against a defenceless person, whether it was perpetrated by multiple persons acting together, and whether it has the characteristics of abuse.

Threats (section 263)

Any person who by words or conduct threatens to engage in criminal conduct under such circumstances that the threat is likely to cause serious fear shall be subject to a fine or imprisonment for a term not exceeding one year.

Aggravated threats (section 264)

Aggravated threats are punishable by imprisonment for a term not exceeding three years. In determining whether the threat is aggravated, particular weight shall be given to whether it was directed at a defenceless person, whether it was made without provocation or by multiple persons acting together, and whether it was motivated by the aggrieved person's skin colour, national or ethnic origin, religion, life stance, homosexual orientation or impaired functional ability.