Licentium

COMPARATIVE LEGAL GUIDE

iGaming product mechanics and market entry

For product teams, software suppliers and advisers

18 main jurisdiction comparisons

Product mechanics / Market entry

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This guide explains selected legal and practical issues affecting iGaming products, promotions and market entry. It is general information, not advice or permission for a particular business. The applicable result depends on the complete mechanics, entity, territory and current law. The chapters state specific scope limits. Obtain a current, scoped assessment before an operating decision. Read the use and legal notices at the end.

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1. Foundations

A method for connecting product mechanics, permissions and evidence.

The decisions this guide supports

Product mechanics determine which legal questions arise. The permitted route then depends on the activity, the responsible entity, the player market and the law actually in force. A useful assessment keeps those layers separate and connects each conclusion to evidence.

A guide for product and market decisions

This guide explains how paid games, free draws, skill competitions, promotional campaigns, virtual currencies and transferable rewards can enter different legal regimes. It is written for founders, product teams, software suppliers, commercial teams and advisers preparing a scoped market-entry assessment. It gives explanations and comparisons; it does not classify an undisclosed product automatically.

The regional chapters cover 18 main jurisdiction comparisons across seven regions. The United States chapter examines selected states, and the Canadian chapter combines federal law with Ontario and Quebec points. Great Britain excludes Northern Ireland. Additional screening notes identify markets that need a distinct assessment.

Three questions before an operating decision

First, what activity does the implemented product create? The relevant facts include every way a participant pays or acquires credits, the role of chance and skill, and the ways a reward can produce value. Second, is there a lawful route for that activity and that business? A prohibition, a conditional exclusion, an application process and an issued permission have different consequences. Third, can the business operate the necessary controls and substantiate the conclusion?

A licence analysis should identify one entity and one activity at a time. The operator, promoter, software developer, final supplier, payment provider and affiliate may have different obligations. The same product may require different settings or remain unavailable in different markets. [R02] [R17]

Navigation and source status

The contents, PDF bookmarks and bracketed source references are clickable. Source references lead to the source register; source titles link to the cited material. Each jurisdiction includes practical implications and specific limits. These qualifications are part of the analysis and should travel with any excerpt.

How product mechanics change the legal analysis

A product can cross a legal boundary through a small change in price, prize value, randomisation, free access or redemption. The whole arrangement matters, including linked products and the conduct of related parties.

Consideration and financial sacrifice

Consideration is used here as a convenient label for what a participant provides. The controlling legal term may instead be payment, stake, financial sacrifice or payment for a winning chance. Those terms should not be treated as interchangeable across countries. A purchase, subscription, entry charge, premium communication fee, refund arrangement or bundled credit may need a different analysis.

For example, the British lottery rules address a price for goods or services that reflects the chance to participate, while the French provision addresses an advance even where reimbursement is later possible. The useful commercial evidence is the normal price, what the customer receives without the promotion, the payment path and the actual refund conditions. [R14] [R18]

Chance and skill operate at different stages

Randomness can affect entry, matchmaking, available information, starting resources, scoring, tie-breaking or final prize selection. A game may reward skill during play while a later draw determines who receives value. A meaningful explanation identifies those stages and the legal test relevant to each one.

The tests differ. New York uses a material degree of chance; Germany refers to wholly or predominantly chance-based outcomes in its definition. British lottery analysis asks whether the skill requirement can reasonably exclude a significant proportion from participation or prize success. Those formulations do not establish a single international percentage of skill. [R01] [R22] [R16]

A study showing that experienced players perform better may be useful evidence, but its relevance depends on the rule. A sound study describes the player population, sample, game version, repeated-play horizon, random variables and what counts as success. Statistical evidence cannot supply an exemption that the relevant statute does not provide.

Prizes and value beyond cash

The product economy includes more than the final cashout button. Rewards may be credits, goods, discounts, digital items or rights that users exchange with one another. A restriction in written terms can be relevant, but it should be examined alongside permitted transfers, platform behaviour, related-party purchases and any actual secondary market.

The British gaming definition refers to money or money's worth. France's framework for games with monetisable digital objects (JONUM) specifically addresses qualifying objects. These examples show why an analysis should describe the actual rights attached to an item and the route by which it acquires value. They do not mean that every token falls within the same legal category. [R15] [R21]

A free route must be assessed in context

A free route can matter to the applicable lottery test, but a sentence in the terms does not explain its operation. Relevant evidence includes visibility, cost, processing time, eligibility, entry limits and equal treatment in prize allocation. The British guidance expressly addresses several of these features. [R13]

A separate targeted prohibition can still apply. New York's dual-currency provision addresses defined online sweepstakes games, including specified supporting activities. The product should therefore be tested against the full applicable framework after the free-route analysis, rather than assuming that the presence of some free entries ends the inquiry. [R02]

A promotion must have the claimed commercial function

Where a route depends on a genuine sales promotion, the underlying transaction and frequency matter. An incidental campaign supporting a product is a different factual arrangement from a continuous game economy whose nominal product primarily enables repeat participation. Normal pricing, the ordinary customer proposition, duration and recurring prize cycles help establish that distinction.

Florida's promotion statute concerns arrangements connected with and incidental to consumer sales. California's regulator describes a distinction between incidental promotions and ongoing gambling operations. Swiss guidance adds conditions concerning duration, addiction risk and price or equal free access. These are local conditions; combining fragments from them does not create a new universal exception. [R04] [R06] [R25]

Product claims and the analysis they require

Product claim	What the assessment must establish
A paid bundle with free credits	The full price and credit economy, the actual free route and any targeted dual-currency prohibition. [R02] [R14]
A game advertised as skill based	The local legal threshold, each chance stage and evidence of the skill requirement. [R01] [R16] [R22]
Rewards that cannot be cashed out directly	Transfer, redemption, related-party purchases and the actual rights or money's worth. [R15] [R21]
A campaign connected to product sales	The genuine sales purpose, ordinary price, duration, frequency and statutory conditions. [R04] [R06] [R25]
Software supplied to a licensed customer	The supplying entity, actual functions and any separate supplier obligations. [R17] [R11]
A permission held in another territory	The destination market, permit scope and any applicable recognition rule. [R24]

From classification to market entry

Classification describes the legal category. Market entry requires a separate answer about permission, the responsible entity, territorial scope and operating conditions.

A legal route can take several forms

An activity may be prohibited, outside a particular gambling definition, subject to a conditional exclusion, available only under a licence, or temporarily affected by transitional rules or court orders. An application opportunity is not an issued permission. A regulator's register entry is evidence of the listed permission, not a substitute for its conditions.

A conclusion should state the rule, the facts that satisfy it, the remaining conditions and the effect of missing evidence. If a required element remains unknown, the appropriate result is an unresolved assessment with a specific next step. A generic disclaimer does not cure that uncertainty.

Responsibilities follow the activity

The operator usually controls the player relationship and provision of the game; a promoter may control a campaign; a developer may create or adapt the mechanics; a final supplier may contract to provide the software. Hosting, payments, geolocation and marketing may introduce additional roles. One entity can perform several functions, and a group can divide them across companies.

British software guidance shows that development, adaptation, installation and final supply can require their own licensing analysis. Ontario's guidance separates the operator's registration and agreement from supplier readiness. An agreement stating that a customer is responsible for compliance does not prove that the supplier has no statutory obligations. [R17] [R10] [R11]

Territorial scope must match real access

The company's place of incorporation, server location, governing-law clause and player location answer different questions. Germany's treaty places significance on where participation is offered. The Court of Justice of the European Union (CJEU)'s Liga Portuguesa decision also shows why permission in one state does not itself establish an entitlement to offer internet gambling in another. [R22] [R24]

The operational assessment should explain who can register, pay, play and redeem, and how the business handles location discrepancies or attempted evasion. A country list in the terms is only part of that account. The necessary control strength depends on the applicable law, licence and risk; this guide does not prescribe a universal geolocation standard.

Contracts and evidence support the permission

Contracts can allocate implementation work, reporting duties, audit access, update approval and remediation. They should align with the permission actually held, including the entity, product, domain, territory and relevant licence conditions. They cannot create a regulator's permission or make a prohibited activity lawful.

The product version matters. A change to credit pricing, randomisation, transferability, redemption, marketing or customer territory can invalidate a premise on which an earlier assessment relied. The useful governance record is the reason for the original conclusion and the changes that require it to be revisited.

Stop conditions and reopening an assessment

A launch should not proceed on an unidentified licence, an assumed exception or an unresolved order that could prevent the intended activity. The regional chapters identify scope limits and transitional issues. A product-specific assessment must address the exact question before reaching a launch conclusion.

Reopening an assessment is particularly important when the law changes or a different product function is introduced. Preserve the earlier conclusion and its factual assumptions. Record the new source or design change, identify the affected markets and controls, and issue a new version when the evidence supports it.

Evidence that supports a defensible assessment

The most useful evidence explains what the product actually does and why the legal conditions are met. Marketing labels and contractual assurances provide only part of that account.

The product and the value flow

An assessable product description follows the user from first contact through registration, payment or free access, participation, selection and reward. It identifies every relevant currency, credit or item and the entities that issue, transfer, redeem or repurchase it. A diagram can help, but it must agree with the implemented interfaces, code and commercial rules.

Pricing evidence should show the ordinary product value and any relationship between expenditure and participation. Promotion evidence should show the campaign purpose, start and end, prize stock, entry processing, selection and actual fulfilment. These records help apply the local tests discussed in the regional chapters. [R04] [R09] [R14]

Technical evidence and reproducibility

A technical account should identify random inputs, scoring logic, odds or distributions, tie-breaking, player influence and version control. Skill testing should use the relevant population and game presentation. The results should be reproducible enough for an adviser or competent reviewer to understand the conclusion and its limits.

Certification has a defined scope. A report on a random-number generator is not necessarily a report on the entire prize economy, free route or territorial offer. Likewise, a report on one version does not establish the behaviour of a later configuration. Ontario's supplier-readiness guidance is one example of the need to connect the actual technology to the required certification route. [R11]

Permissions and responsibility

The relevant permission evidence is the issued instrument, its holder, scope, conditions and current status. An application receipt, another group company's permission or a customer's statement may be useful leads but should be identified as such. The review should also establish who implements each required control and who can change it.

Sensitive personal data should be kept in appropriate systems and shared only through a suitable channel. The guide does not collect project information. A request for professional review is a separate process requiring its own scope, recipient and data-handling arrangements.

What a useful conclusion looks like

A useful conclusion explains which legal route applies to which entity and product version in which territory, the evidence supporting it, the conditions that remain, and the events that would change the answer. It should distinguish a verified rule from guidance, an assumption, an unresolved fact or an implementation recommendation.

That structure allows a team to decide whether to proceed with a defined route, change the mechanics, limit the market or stop pending a specific answer. The objective is an accountable decision supported by evidence, rather than a label that hides the remaining work.

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2. North America

Selected federal, state and provincial comparisons. A country heading does not establish a single nationwide route.

United States

A United States launch needs a state-by-state analysis. New York, Florida and California illustrate different legal questions: the underlying gambling test, a regulated commercial promotion, and a targeted online-sweepstakes prohibition. They are comparisons, not a nationwide clearance.

New York and material chance

New York treats a contest as one of chance where chance affects the outcome to a material degree, even if skill also matters. Gambling links the staking of value with a chance contest or an uncontrolled future event and an expected valuable return. Assistance can extend beyond the player-facing operator. A product review therefore needs the actual scoring, randomness and value flow, rather than a marketing description such as skill game. [R01]

Dual currency and supporting businesses

Section 912 separately targets defined online sweepstakes games that use a dual-currency payment system, permit cash or cash-equivalent outcomes or chances, and simulate specified gambling formats. Its support prohibition names payment processors, geolocation providers, content suppliers, platforms and media affiliates. Adding free coins or describing a purchase as entertainment does not itself answer that definition. The enacted provision must be applied to the complete arrangement and the relevant actor. [R02] [R03]

Florida commercial promotions

Section 849.094 concerns promotions incidental to consumer-product or service sales. Entry cannot require an entry fee, payment or proof of purchase. For announced prizes exceeding $5,000, the section specifies advance rules/prize filing and trust-account or bond requirements, subject to its conditions and possible waiver. Rules and material advertising disclosures, actual prize delivery and prescribed winner records also matter. The statute expressly says compliance does not authorise another gambling violation. A promotion filing is therefore a separate issue from gambling classification. [R04]

California and the purpose of the promotion

The Commission identifies Assembly Bill (AB) 831, Chapter 623 of 2025, among changes effective from 1 January 2026. Its official summary addresses digital simulated gambling and online sweepstakes, while distinguishing limited promotions incidental to genuine product sales from ongoing gambling operations. The guide does not set out the complete current elements in Penal Code section 337o and Business and Professions Code section 17539.1. [R05] [R06]

Practical implications

- Keep the rules, user interface, pricing history and token ledger consistent. A free route described in terms but ineffective in practice does not supply persuasive evidence.

- Assess supplier and marketing exposure alongside the operator. A service contract cannot establish that the underlying activity is lawful.
- Preserve state-specific product variants and exclusion controls. Review federal, tribal, payment, consumer and advertising issues separately where applicable.

Specific limits
Only New York, Florida and California are substantively compared here. Other states and federal law need their own analysis. The guide does not cover the detailed current California statutory text or subsequent enforcement and case history.

Canada

Federal offences, provincial permission and promotional disclosure operate together. A paid mixed chance-and-skill competition cannot be assessed solely by adding a short knowledge question or a no-purchase statement.

The federal starting point

Criminal Code section 206 contains several differently framed offences. Paragraph 1(f) addresses disposing of goods through chance or mixed chance and skill where a competitor pays money or other valuable consideration; other paragraphs address additional chance-based schemes and conduct. A legal conclusion needs the applicable paragraph and the entire prize-allocation sequence. Removing payment from one route or inserting skill at one stage is not a universal answer. [R07]

Permission and the Ontario operating model

Section 207 provides specified lawful arrangements, including provincial conduct and management and defined licensed routes with conditions. It is not a general private commercial licence. Ontario requires private internet-gaming operators to register with the Alcohol and Gaming Commission of Ontario (AGCO) and enter an operating agreement with iGaming Ontario (iGO) before offering games. Supplier readiness is separate: iGO identifies AGCO registration for some suppliers and certification of relevant technology by an AGCO-registered testing laboratory. The exact supplier functions and current AGCO criteria must be identified. [R08] [R10] [R11]

Promotion disclosures and Quebec

Competition Act section 74.06 addresses adequate, fair disclosure of prize numbers and approximate values, the relevant areas and material facts affecting the chances of winning. It also addresses undue prize-distribution delays and how selection or allocation occurs. Those duties can apply to skill and mixed contests as well as chance promotions; satisfying them does not determine criminal legality. [R09]

Quebec's 2023 chapter 24 repealed its specific publicity-contest chapter and rules, with a transition for contests received before 27 October 2023. Older instructions to register every Quebec publicity contest should not be carried forward automatically. The repeal does not decide the other federal or provincial requirements applicable to the actual offer, including language, consumer and personal-information issues. [R12]

Practical implications

- Identify the provincial market, player location, operator agreement and each supplier role. A Canadian address or foreign permission is not a substitute.
- Keep the complete selection process, prize inventory, material odds assumptions and actual fulfilment evidence.
- Commission a local review of the exact free route and skill requirement; do not treat a customary arithmetic question as a universal statutory exemption.

Specific limits
The federal consolidations are current to 29 October 2026; the chapter does not cover later amendments. The complete current Ontario supplier criteria, Quebec language/consumer requirements and other provinces are outside this chapter's scope.

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3. Europe

Compare the actual statutory tests. Neither a free-entry label nor a permission from another market supplies a universal answer.

Great Britain

The distinction between a lottery, a prize competition and gaming is essential. A conclusion about free entry under the lottery rules does not automatically settle the separate gaming definition.

Free routes and the price of entry

Schedule 2 treats payment broadly enough to include money's worth and a goods or services price reflecting the chance to participate. Normal-rate communication has specific treatment. A qualifying choice of free entry must be properly publicised and the prize-allocation system must treat the routes equally. The regulator also emphasises convenience and visibility. Screenshots, purchase baselines and the processing of actual entries are more useful than a statement that a free route exists. [R13] [R14]

A meaningful skill barrier

The Commission's explanation of section 14(5) distinguishes a genuine skill, knowledge or judgment requirement from a token question. The requirement must reasonably be expected to prevent a significant proportion either from participating or from receiving a prize. The source does not prescribe a universal percentage. Test evidence needs to reflect the real audience and presentation, including hints and retries. Only a court can provide a definitive interpretation in a disputed case; the Commission does not pre-approve schemes. [R16]

Gaming and software roles remain separate

Section 6 defines gaming through a game of chance and a prize. It includes mixed chance and skill and can apply whether or not the player risks losing something. This is why a no-payment analysis confined to lotteries may be incomplete. The nature of a transferable reward and the particular exemption or permission need separate consideration. [R15]

Software licensing also follows function. The Commission identifies manufacture, adaptation, installation and supply as relevant activities; its guidance gives specific treatment to the final supplier to a licensed operator and some group structures. An operator changing its own gambling software may need an additional or linked permission. Contract labels such as platform provider or intellectual-property (IP) holder do not settle the assessment. [R17]

Practical implications

- Separate the lottery-payment analysis from the gaming and betting analyses.
- Preserve test design, participant results, randomisation and every prize-allocation stage.
- Review the actual supplying entity, software functions, customers and territorial connection before choosing a licence category.

Specific limits
This chapter concerns England, Wales and Scotland. Northern Ireland requires a separate framework. The section 14 discussion is limited to the Commission's quoted explanation and the selected statutory text identified in the sources. Consumer, advertising, tax and any voluntary prize-draw code remain separate considerations; a voluntary code does not amend the Act.

France

France illustrates why the vocabulary of free draws, skill games and digital collectibles cannot be imported unchanged from another market. Public offers, partial chance, financial sacrifice and specific exceptions each require analysis.

Financial sacrifice and partial chance

Article L320-1 addresses public operations offering an expected gain attributable even partly to chance where participants make a financial sacrifice. The text also addresses skill-based operation and advances even if later reimbursement is possible. A refundable entry price therefore needs examination; a refund promise should not be treated as removing the financial element. The explanation here follows the French statutory text. [R18]

Advertising operations and the current statutory route

The relevant current cross-reference is article L320-6(7), which refers to promotional operations under Consumer Code article L121-20. That consumer provision addresses promotional prize practices when they are unfair. It does not create a general licence for an ongoing gambling business. The older L322-2-series provisions found in historical materials have been repealed and should not be used as current citations. The genuine commercial purpose, price, campaign duration, presentation and repeated-play design remain important application facts. [R19] [R20]

Monetisable digital objects

Autorité nationale des jeux (ANJ) describes the JONUM experimental regime under the 2024 law on securing and regulating the digital space (SREN) and a 2026 implementing decree. Its published guidance identifies cumulative features involving payment, chance, online access and monetisable digital objects. It requires a prior declaration and imposes operator, player, game and reward conditions. The guidance distinguishes permitted object transfers from operator buyback and excludes legal-tender winnings within this route. A transferable token is therefore a classification question, not an automatic escape from regulation. The underlying law, decree and all conditions must be checked for the proposed product. [R21]

Practical implications

- Distinguish an incidental promotion, conventional gambling and a qualifying JONUM offer before designing terms.
- Examine the complete refund, resale, redemption and related-party purchase arrangements.
- Use the controlling French text and an appropriate local analysis; an English label or another state's licence is insufficient.

Specific limits
The guide covers selected provisions of L320-1, L320-6 and L121-20, rather than the full consolidated French regime. The JONUM discussion rests on current official ANJ guidance; it is not a full article-by-article clearance under the law and decree.

Germany

The German test links payment for a winning chance with an outcome wholly or predominantly dependent on chance. The available permission route then depends on the specific type of game and its territorial offer.

Payment and the outcome mechanism

Section 3 of the Interstate Treaty defines gambling through payment for acquiring a chance to win and a wholly or predominantly chance-based decision. It also addresses betting on uncertain future events, separate internet-game categories and public access. The legal test differs from New York's material-chance formulation. A technical study should therefore explain what the relevant player can control, the role of repeated play and every random stage, rather than merely report that experienced players outperform beginners. [R22]

Permission is category specific

Section 4 requires the competent permission for organising or intermediating public gambling. Internet permission is limited to listed categories; other online public gambling is prohibited. The provision also addresses participation in payments for illegal gambling and the separation of transactions when a business mixes offers. Age controls and other protective conditions are part of the statutory framework. A supplier or payment provider should understand the permitted customer, category, domain and activity rather than rely on a generic assurance that the business is licensed. [R23]

Territory and the European context

Section 3 locates organisation or intermediation where the player is offered the opportunity to participate. Moving servers or the contracting entity offshore does not by itself answer the destination-market question. [R22]

The CJEU's Liga Portuguesa judgment explains why lawful internet-gambling activity in another Member State does not alone establish a right to serve the destination market. The Court also assesses justification and proportionality in context. The practical conclusion is to check the applicable German permission and its conditions; it is not to presume either automatic recognition or that every restriction is necessarily valid. [R24]

Practical implications

- Map the proposed game to an available legal category before committing to a licence strategy.
- Describe territorial access, account and payment restrictions as operating controls that must actually work.
- Assess organiser, intermediary, software and payment functions separately. A British supplier-licence category should not be assumed to have an identical German counterpart.

Specific limits
Category-specific treaty provisions, Land implementation, permit conditions and relevant case law require further assessment for a real launch. The CJEU decision is a specific judgment, not an exhaustive account of later EU jurisprudence.

Further European screening

Additional jurisdictions need their own screening. Similar promotional language can conceal different tests and regulatory institutions.

Switzerland

Gespa describes exclusions for certain short-duration sales-promotion lotteries and skill games that do not create addiction risk and require goods or services at reasonable market prices. Its separate mass-media category requires free participation on the same access and participation conditions. All defining conditions matter. Failure to qualify may bring the activity back within regulated gambling. This is a screening comparison, not a Swiss launch opinion. [R25]

Northern Ireland and the EU

The Great Britain chapter deliberately excludes Northern Ireland. A route assessed under the Gambling Act 2005 should not be extended there by changing the territory label. This guide does not provide a substantive Northern Ireland opinion.

Within the EU, evaluate the destination state's gambling law and any applicable EU-law constraints separately from data-protection or consumer rules. A conclusion on one of those subjects does not supply the missing gambling permission. [R24]

Specific limits
No complete Swiss federal/cantonal or Northern Ireland statutory analysis is supplied.

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4. Asia

Distinct definitions and promotional routes in Singapore, Hong Kong and India.

Singapore

Singapore uses conditional routes for specified lower-risk activities. Classification and compliance with the precise class licence remain separate questions. A free-entry label does not complete either analysis. [AS01] [AS04]

Chance and the territorial connection

The selected statutory text treats a lottery as capable of arising from chance at any stage, even where other elements involve skill. Participation can involve attendance or another qualification without payment. The Act also identifies operational functions, including relevant server activity and facilitating participation. The review therefore needs the actual player connection, location of functions and mechanism of prize allocation. A statement that the company merely supplies software is not a substitute for that functional analysis. [AS01]

Two different remote-game routes

The remote-games order defines free play by addressing direct and indirect charges, deposits and microtransactions, including amounts described as refundable. It separately addresses download, equipment and qualifying subscription payments. Type 1 requires free participation for every player and restricts specified mechanics, imagery and transfer of complimentary tokens. Type 2 has its own eligibility conditions and restricts conversion services operated by the licensee or an associate. Neither route should be reduced to a rule that coins or an alternative free route make a game permissible. [AS02]

Promotions have a separate route

The promotional order has a distinct trade-promotion class licence. It separates trade campaigns from cause-related and survey arrangements, and includes conditions about publicity, information, non-instant events and winner notification. The relevant promotional purpose and the entire customer journey matter when selecting the route. A stand-alone casino-style product should not be presented as a promotion simply because it advertises another service. That is an inference to test against the complete definition and exclusions, rather than a new statutory exemption. [AS03]

Compliance is the basis of the permission

The Gambling Regulatory Authority (GRA) explains that the described class-licence regime does not require an application or notification. The operator can rely on it only while meeting all applicable requirements; failure to satisfy the order prevents reliance on that route. The practical distinction is important: the absence of an application process does not mean the activity is unregulated. A versioned analysis should connect each condition to the actual game and the person providing it. [AS04]

Practical implications

- Trace paid and free journeys, subscriptions, microtransactions, prizes and any operator-supported exchange before choosing a route.
- Treat changes to artwork, token transfer or monetisation as reasons to revisit the class-licence analysis.

- Keep the legal conclusion tied to the exact product, provider, customer connection and operative version of the order.

Specific limits
The chapter covers selected provisions. It does not provide a complete account of the current Act, orders, schedules and amendments or a product-specific launch conclusion.

Hong Kong

Qualifying trade promotions follow a specific licensing route in Hong Kong. [AS05]

The category depends on the activity

The Office of the Licensing Authority (OLA) guidance quotes a broad gaming definition covering games for money or property winnings whether or not a player risks losing property. The game concept includes combined chance and skill. Its examples distinguish ordinary sales through capsule machines from arrangements where some randomly dispensed items have substantially greater value. [AS06]

What the promotional licence requires

The December 2025 guide reproduces the power in section 22 of the Gambling Ordinance to license trade-promotion competitions. The published conditions prohibit entry fees and money prizes and require the licence number in advertising. The guide expressly applies the licensing question to online promotions involving a lottery or gaming. It asks for the rules, publicity and mechanics, and advises submission at least two calendar weeks before commencement. These are operational planning requirements, not wording that can be satisfied by adding a disclaimer. [AS05]

The organiser and draw structure matter

OLA distinguishes independent daily draws from cumulative arrangements when explaining how many licences are required. It also says that an overseas promoter without a Hong Kong branch should appoint a Hong Kong-registered agent as applicant. That guidance makes the local applicant, promoter, distribution channels and repeated-event design material to the review. A permission issued to one company should not be assumed to cover every participant in a joint promotion. [AS06]

Practical interpretation

Cash rewards, entry charges and changed online mechanics require reassessment against the issued licence and current conditions. The permission must cover the proposed product and organiser. [AS05]

Practical implications

- Build the campaign calendar around obtaining the actual permission and implementing its conditions.
- Analyse repeated draws and local versus overseas organiser roles before deciding who should apply.
- Assess separately whether a product belongs in the trade-promotion, amusement-with-prizes or another regulated category.

Specific limits
The chapter uses the statutory extract quoted in the licensing guide. It does not provide a complete account of current legislation, case law or issued licence conditions.

India

The Promotion and Regulation of Online Gaming Act, 2025 and the 2026 Rules came into force on 1 May 2026. The framework prohibits defined online money games while setting separate conditions for online social games and recognised e-sports. [AS07] [AS08] [AS09]

The defined money-game prohibition

The Act's money-game definition covers skill, chance or both when paid participation or stakes carry the specified expectation of enrichment. Purchased virtual credits can qualify as stakes. Sections 5-7 prohibit offering and assistance, advertising and payment facilitation. Offshore services offered in India are within scope. Classification therefore begins with payments and rewards, before considering skill. [AS07]

Social games and recognised e-sports

Social-game access fees must not function as stakes or wagers. E-sports carry recognition, registration, skill and no-betting conditions. A paid contest does not become an e-sport through branding. The government describes social games and e-sports as the supported categories alongside the money-game prohibition. [AS07] [AS24]

Determination is specific to the game and provider

Rule 8 does not require every game to undergo determination: triggers are an Authority direction, an intended e-sport offering or a notified social-game category. Rules 9-11 examine the economic design and external asset use. Determinations are game/provider-specific; payment changes may require a fresh assessment. [AS09]

Rule 12 separately requires registration for notified games or categories and intended e-sports. The Authority may also require registration while determining a rule 8(2) application, considering the specified risk factors. Registration is game/provider-specific. A non-money-game finding for an intended e-sport does not establish e-sport status; sports-law recognition and registration remain necessary. These provisions create neither universal social-game registration nor a licensing route for prohibited money games. [AS09]

Current orders still matter

An official Supreme Court office report records connected challenges to the Act and earlier procedural orders. It is not a merits judgment and does not establish the position of all later orders. The existence of litigation should not be described as suspending the Act without the operative order. The practical assessment must reconcile current judicial directions, Authority decisions and applicable State law with the central framework. [AS10]

Practical implications

- Treat monetisation changes, token cash-out and rewards outside the game as classification events, not merely commercial adjustments.
- Analyse advertising, distribution and payment support alongside the operator's activity.
- Retain the game/provider-specific determination, registration and current orders where the selected route requires them.

Specific limits
The guide covers the Act, its commencement notification and the Rules. It does not provide a complete account of later litigation, category notifications or individual Authority directions.

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5. Middle East

Separate commercial gaming, campaign permissions and adjacent financial or virtual-asset regimes.

United Arab Emirates

The United Arab Emirates (UAE) assessment should identify the commercial-gaming activity and each participant's role. The General Commercial Gaming Regulatory Authority (GCGRA) states that conducting or facilitating commercial gaming requires its authorisation, including relevant third-party products and services. [AS11]

The regulated activity is broader than a casino label

GCGRA describes lottery, internet gaming, sports wagering and land-based gaming as regulated activities. Its internet-gaming explanation expressly includes chance, skill and mixed games, with examples extending to fantasy and peer-to-peer products. These examples identify the regulator's stated perimeter. They do not establish that every product using one of those descriptions has been approved. The commercial and technical mechanics still need to be matched to the actual permission. [AS13]

Separate categories for separate roles

The published categories distinguish operators, gaming-related vendors, corporate key persons, individual key persons and gaming employees. GCGRA notes that multiple licences may be required. A platform supplier should therefore examine its own functions and control, rather than rely solely on the customer's operator status. Ownership and management roles can add another layer to the analysis even where the contracting entity is described as a technology provider. [AS12]

Registers establish limited facts

The public register lists separate lottery, land-based and vendor licensees, and lists Coin Technology Projects LLC in the internet-gaming and sports-wagering categories. It would be inaccurate to infer that no internet-gaming licence exists. The register also does not state every product approval or licence condition. Its proper use is to verify the named entity and category, followed by checking the actual instrument and scope needed for the proposed relationship. [AS14]

Other regulatory permissions remain distinct

The Virtual Assets Regulatory Authority (VARA)'s published process covers relevant virtual-asset activity in or from Dubai excluding the Dubai International Financial Centre (DIFC). It distinguishes approval to incorporate from permission to carry on activity. A token-based product can therefore raise a separate virtual-asset question; a virtual asset service provider (VASP) permission is not itself a GCGRA gaming authorisation. That conclusion follows from the distinct stated regulatory functions. DIFC and Abu Dhabi Global Market (ADGM) connections require their own analysis rather than being grouped into one Dubai or federal permission. [AS16] [AS11]

From inquiry to an operating route

GCGRA's process begins with contact and assessment before an invitation to apply. A possible application route must be distinguished from an issued, operationally effective approval. [AS11]

The regulator identifies Federal Law by Decree 30 of 2022 as its founding law and expects compliance with applicable technical and responsible-gaming requirements. [AS15]

Practical implications

- Check the exact legal entity, licence category, products, conditions and territorial operation involved in each proposed supply relationship.
- Analyse token, payment and free-zone connections separately from the gaming classification.
- Do not treat an invitation, incorporation approval or another entity's public listing as permission to launch.

Specific limits
The guide covers regulator guidance and the register. It does not provide a complete analysis of Federal Law by Decree 30 of 2022, the criminal-law interface, licence conditions or emirate and free-zone interactions, or a UAE legal-clearance conclusion.

Bahrain

Bahrain has a licensing route for promotional campaigns, separate from the criminal gambling assessment. [AS17] [AS19]

A campaign-specific permission

The government catalogue identifies a service for licensing promotional and discount campaigns. Its supporting material can include advertising, coupons, terms, prize evidence and agreements relating to the campaign. It cites Ministerial Resolution 1 of 1993 for promotions. This supports a campaign-specific approach: the actual mechanic, prize commitment and organiser are relevant to the application, not merely the presence of a promotional title. [AS17]

The criminal provision has its own elements

The Arabic text of Penal Code Article 308 addresses gambling in a public place, running a public gambling establishment, and participation in organising, supervising or providing its means. Its definition concerns gain and loss dependent on chance rather than controllable factors. Those elements should be preserved in the analysis. They do not justify a statement that every remotely accessible promotion is covered by the same provision, or that everything outside its public-place wording is necessarily lawful. [AS19]

Consumer rules and the promotional order

The Ministry's official regulations index lists the 1993 promotional order and Law 28 of 2026 amending the consumer-protection legislation. The guide does not set out the underlying current texts or the amendment's commencement. The guide therefore does not prescribe a universal fee, prize cap, overseas-draw rule or application timetable for Bahrain. Those details should come from the current instrument and the actual licence. [AS18]

Implications for product planning

The review should distinguish the promotion, any continuing game service and payment or token functionality. A campaign permission should not be assumed to authorise an ongoing platform. This is an analytical recommendation, requiring confirmation against the current instrument and actual permit. Material changes should trigger review of the original permission. [AS17]

Practical implications

- Obtain the current promotional order, applicable consumer amendments and issued conditions before committing to the campaign design.
- Preserve the difference between a local campaign permit and permission for an ongoing online service.
- Confirm the relevant applicant, location, draw arrangements and supplier responsibilities in local advice.

Specific limits
The guide covers the official catalogue, legislation index and selected Arabic statutory provision. It does not determine the current amendment history or online territorial application. The two cited Penal Code versions also differ on a repeat-offence penalty, so no penalty figure is stated.

Additional screens: Asia and the Middle East

These are screening observations, not full jurisdiction chapters or conclusions that a proposed launch is permitted.

Japan

The selected official Penal Code text addresses gambling and profitable gambling operations in Articles 185-186. The narrow momentary-entertainment qualification should not be transformed into a general exemption for an online commercial product. A complete review must also identify any relevant sector or promotional-prize route. The cited version is dated 2025; the guide does not cover the complete current amendment history. [AS20]

South Korea

The Korea Legislation Research Institute (KLRI) English translation distinguishes gambling, providing gambling space for gain and unauthorised lottery tickets. Its header identifies a 2016 consolidation. This is a historical screening comparison. The guide does not set out the current Korean text or the relevant game, lottery and distribution legislation. A foreign licence should not be substituted for that analysis. [AS21]

Saudi Arabia

The Ministry of Commerce's September 2025 statement describes a licensed commercial-competition route, including no purchase condition, price controls, draw supervision and advertised terms. That is a constrained promotion route, not a commercial-gambling licence. Exact current regulations, permit terms and execution requirements still need confirmation for the campaign. [AS22]

Qatar

The Penal Code definition combines uncontrolled chance with an agreed transfer of money or another benefit following loss. A promotion must be assessed against both criminal rules and its own licensing framework. This screening does not provide a complete analysis of the current text or infer permission merely because one element appears absent. [AS23]

Practical implications

- Use these screens to decide where a full local-source assessment is needed. They do not form a ranking of easy or safe markets.

Specific limits
The screens cover only the specified provisions or official statements. Their translation and version limits apply.

LICENTIUM GUIDE

6. Africa

National and subnational competence, category-specific permissions and the effect of live court orders.

South Africa

South Africa requires a product-specific classification. The National Gambling Board (NGB) distinguishes licensed online betting with a South African bookmaker from prohibited unauthorised interactive gambling. An internet delivery channel, a foreign licence, or a supplier relationship does not establish permission for the underlying product. [AF01] [AF02]

How the mechanics change the analysis

The National Gambling Act defines a gambling game by reference to consideration, an opportunity for a payout, and a result that may depend on skill, chance or both. Its payout concept includes merchandise, credits, tokens and other value; a limited further-play exception is not a general exemption for transferable or redeemable rewards. A product described as a skill challenge therefore needs analysis of its actual economic loop. [AF01]

For product design, trace what the participant gives and what the participant can ultimately obtain. A paid access tier, purchased attempt or exchangeable reward changes that analysis even if the interface uses points, levels or badges. Distinguish progression that has no independent value from a balance that can buy goods, move between users or become a prize. This is an application of the statutory tests, not a finding that any particular points scheme is gambling. [AF01]

The commercial promotion route

Section 36 of the Consumer Protection Act separately regulates promotional competitions. It restricts entry consideration, misleading prize representations and certain insider awards, and requires competition rules. A skill hurdle does not automatically remove a chance-based promotion from this framework. The associated regulation 11 requires independent oversight and retention of specified competition records for three years. [AF03] [AF04]

A useful promotion design begins with a defined sponsor, published eligibility and allocation rules, an auditable selection method, and a funded prize commitment. The engineering specification should preserve the rules actually shown to each entrant and the evidence of selection and delivery. Treat these as operating requirements for a campaign, rather than assuming that a general platform terms page supplies all the necessary information. [AF03] [AF04]

Operator and supplier roles

Sections 37-39 distinguish national licensing for activities such as manufacture, supply, maintenance and testing, administered through provincial licensing authorities. A supplier licence authorises its specified activity; it is not evidence that every customer-facing game offered through the supplied technology is authorised. The regulator also directs users to the relevant provincial authority for an operator's licence and conditions. [AF01] [AF02]

In practical contracting, describe who controls eligibility, game configuration, stakes, prize funds and settlement. A provider that only supplies software has a different factual role from one that selects winners or manages money. The contract and the deployed controls should tell the same story. Province, product and licence conditions remain necessary parts of that assessment.

Practical implications

- Keep ordinary loyalty progression, promotional competitions and regulated gambling as distinct configurations with explicit permitted uses.
- Evaluate reward value and participant consideration before choosing the “skill”, “free” or “promotion” label.

Specific limits
The guide covers the national Act and regulator guidance. It does not provide a complete account of provincial legislation, licence conditions or later amendments to the promotion regulations, or clearance of any particular operator or supplier.

Kenya

Kenya’s 2025 statutory framework expressly reaches online gambling, prize competitions, gambling software or platforms and certain media promotions. However, the 2026 litigation creates a material barrier to treating the published Act and licensing regulations as an uncomplicated, fully operative launch route. The guide does not determine the complete effect of the operative court orders or provide a blanket permission or suspension conclusion. [AF05] [AF06] [AF07]

The statutory architecture

Section 28 of the Gambling Control Act lists gambling activities and services requiring licences, including provision of gambling software or a platform. Sections 120-122 address repeal and transition, including continuity for licences issued under the former Act for their stated period. These provisions explain the intended regulatory structure; their application must be read with the relevant interim orders and the actual licence concerned. [AF05]

For a platform business, the functional distinction is crucial. Marketing software that never provides a gambling mechanism is a different proposition from a service that hosts games, configures odds or distributes prizes. The 2025 text prevents a comfortable assumption that every business-to-business (B2B) provider sits outside the licensing perimeter. A customer’s licence and the supplier’s own role require separate analysis. [AF05]

The scope of the litigation ruling

Wati v Attorney General, [2026] KEHC 16214 (21 October 2026), records an August conservatory order affecting specified Act provisions and commencement of the licensing regulations. It also recounts a separate JRE251 order of 20 July, varied on 7 August to limit the stay to fee increases and gambling capital. The ruling refers the related petitions for administrative directions and temporarily stays those proceedings. It does not supply the complete original and varied order chain. The cited judgment is a reproduction on Sheriahub. [AF06]

Parliament’s October 2026 statutory-instruments tracker marks licensing LN111 and five related gambling instruments as stayed by a court order. The source label refers to 23 October, while its status stamp gives 30 October. This is official corroboration of unresolved implementation, but a tracking table

is not the operative order and does not establish the complete current position. Different proceedings, provisions and schedules may have different effects. [AF07]

Dates and the operational consequence

The Kenya Law revised Act states commencement on 20 August 2025, while an official amendment-history entry for the Kenya Revenue Authority Act records the Gambling Control Act amendment on 26 August. LN111's parliamentary catalogue gives 15 July 2026, while the tracker records receipt on 8 July. The guide does not resolve these source-date differences. [AF05] [AF07] [AF08] [AF09]

A practical implementation decision therefore depends on a consolidated reading of E533, E611, E612 and JRE251: the provisions affected, parties protected, later variations and directions, and the proposed activity. A stayed fee increase does not by itself authorise a business, while a proceedings stay does not by itself repeal the statute. Current fees, capital commitments and launch dates should not be budgeted from a disconnected table.

Practical implications

- Treat Kenya as a conditional route requiring reconciliation of the operative orders and the exact operator and supplier functions.
- Preserve existing licence duration and conditions as separate evidence; transition wording is not a universal extension or permission for new activities.

Specific limits
The guide does not provide the complete original orders, variations and subsequent directions in E533/E611/E612/JRE251. It does not resolve the inconsistent August dates in Wati or determine LN111 publication and commencement dates.

Nigeria

Nigeria should be assessed through the relevant state framework and the precise scope of the Supreme Court's decision in SC1/2008. The certified judgment hosted by the Lagos regulator distinguishes the National Assembly's constitutional competence in the Federal Capital Territory (FCT) from the fate of the old National Lottery Act. Those are different questions. [AF10]

Read the operative orders together

In the judgment delivered on 22 November 2024, order 5 confines National Assembly lottery lawmaking competence to the FCT. Order 8 nevertheless nullifies the entirety of the National Lottery Act, CAP N145. Orders 9 and 10 restrain federal enforcement within the plaintiff states. The constitutional statement about FCT competence therefore cannot be converted into an assertion that this same annulled Act automatically survives there. The relevant operative text is on judgment pages 69-71. [AF10]

The practical implication is a two-stage inquiry: identify the territory with legislative competence, then identify a presently operative law and permission for the proposed activity in that territory. A federal-looking certificate, an old application process or a statement about national coverage does not answer both stages. This guide does not cover a replacement FCT regime or determine the status of any instrument issued after the judgment.

Lagos illustrates the importance of the activity category

The Lagos State Lotteries and Gaming Authority's published categories include promotional raffles, online sports betting, public online lottery, gaming facilitation, business-to-business and gamification. The existence of a gamification category is especially relevant to a reward platform: the commercial label alone does not establish an exemption. Nor does the category list mean every feature within a broad software product receives the same permission. [AF11]

A campaign that awards prizes by chance, a game sold to a licensed operator and a platform that markets or facilitates access can raise different questions. Establish which entity deals with users, which fixes the rules, which holds or distributes value, and which benefits from participation. Present those functions consistently in the product specification, customer agreement and application materials. These are design and diligence implications of the category structure, not a conclusion that every engagement tool is regulated. [AF11]

Territorial scope must match deployment

For a service marketed across Nigeria, use the actual customer and player locations to define the review. A Lagos authorisation should not be described as proof of permission throughout every state. The Supreme Court decision supports state competence; it does not itself create a single licence that replaces the former national model. [AF10]

Configuration controls should reflect the territory and permitted product, with records of customer authorisations and changes. If expansion adds new states, new prize mechanics or a new money-handling role, the earlier analysis needs updating. This makes the legal scope visible in operation instead of leaving a sales promise broader than the evidence.

Practical implications

- Use the certified judgment, not a compressed "federal except FCT" summary, when explaining the national-law position.
- Treat Lagos as one concrete regulatory route and verify other states and any FCT route separately.

Specific limits
The guide covers the Supreme Court orders and Lagos categories. It does not provide a complete account of state statutes, category conditions or replacement FCT legislation.

LICENTIUM GUIDE

7. Latin America

Promotions and paid gaming follow different routes. Later instruments and operative court orders matter.

Brazil

Brazil cannot be described using only the earlier fixed-odds licensing framework. Medida Provisória (MP) 1,394, dated 25 September 2026, introduces a prohibition covering fixed-odds betting and associated activities; a congressional act of 10 November extends the measure's validity for sixty days. Constitutional litigation remains material. The guide covers these instruments; the complete later docket is outside its scope. [AF12] [AF13] [AF14]

Separate the legislative measure from the court order

MP 1,394 addresses operation, offering, intermediation and advertising, including offers from abroad directed to people in Brazil. Its coverage includes sports outcomes and virtual online gaming events, with specified exclusions for other legally authorised lottery modalities. It contains authorisation wind-down, access and customer-fund provisions; it does not merely change a licence application fee. Ato 118 of 10 November 2026 extends the provisional measure, but does not convert it into permanent legislation. [AF12] [AF13]

The Supremo Tribunal Federal (STF) decision in Direct Action of Unconstitutionality (ADI) 8027, signed on 8 November, orders a stay of ordinary-court proceedings debating the measure's constitutionality pending the STF's final decision, subject to plenary confirmation. That procedural stay is not a general suspension of MP 1,394 itself. The decision's references to individual earlier interim orders must also be distinguished from the operative nationwide procedural direction. The guide does not cover the complete subsequent docket. [AF14]

For planning, an earlier Secretariat of Prizes and Betting (SPA) authorisation or pre-September market overview cannot establish present availability. Operator services, supplier intermediation and advertising each require a current analysis of the measure and applicable orders. A court development affecting one operator should not be generalised to an entire product category without its actual scope.

Promotional competitions remain a separate analysis

Law 5,768/1971 provides a prior-authorisation framework for free distribution of prizes for advertising through draws, contests and related mechanisms. Its cultural, artistic, sporting or recreational contest exception is narrowly conditioned: no chance, payment, or connection to acquisition or use of goods, rights or services. The law also restricts cash prizes and cash conversion in its promotion regime. "Free entry" therefore does not by itself establish an unregulated promotion. [AF15]

SPA's commercial-promotion guidance explains the digital Commercial Promotion Control System (SCPC) route and distinguishes certain objective, guaranteed loyalty or discount benefits from mechanisms involving chance or competition. The useful design question is whether all qualifying customers receive a defined benefit, or whether a mechanism selects who receives a scarce prize. The latter cannot be made into an ordinary loyalty offer simply by naming the reward "points". [AF16]

Application to an engagement platform

Keep a guaranteed customer benefit, an authorised promotional draw and a regulated wagering product distinct in the software specification. Record who sponsors and funds the campaign, how participants qualify, whether rewards are convertible, and how winners are selected. For suppliers, separate general campaign tooling from functions that intermediate or advertise a betting offer. These distinctions enable a focused assessment; they do not remove obligations imposed by the actual transaction. [AF12] [AF15] [AF16]

Practical implications

- Treat the fixed-odds route as legally unsettled under the dated instruments discussed here; do not reuse an older “Brazil is open” conclusion.
- Assess free commercial promotions independently under their own statutory and SPA framework.

Specific limits
The guide covers MP 1,394, its extension and the 8 November STF decision. It does not provide a complete account of the ADI 8027 docket, all operator-specific relief, or final conversion, rejection or later changes to the measure.

Mexico

Mexico’s federal framework makes the kind of game, the presence of betting and the nature of a draw central to the analysis. The Federal Games and Draws Act places authorisation and control with the Secretaría de Gobernación. A commercial promotion without a ticket price can still fall within the regulated draw framework. [AF17] [AF18]

Start with the federal categories

Articles 1-4 of the Act prohibit chance games and betting subject to the activities permitted by the statute, and require authorisation for establishments conducting betting games or draws. The implementing regulation states that activities not expressly contemplated are prohibited. This structure gives little support to an assumption that a novel digital format is permitted simply because the law does not name its interface or technology. [AF17] [AF18]

The product specification should identify whether participation is a contest, a wager, a draw, or a guaranteed customer benefit. Explain the selection mechanism in ordinary language: what creates an entry, who can win, whether chance selects the result, and what the winner receives. The purpose is to map the actual mechanism to the legal category. Calling a feature an engagement tool, giveaway or game of skill cannot substitute for that mapping.

Free promotional draws are not a general exemption

Regulation articles 109-111 address draws without sale of tickets used to promote commercial activities. They contemplate an authorisation specifying the number of participating tickets and the distribution period. The resulting distinction is between a paid-ticket draw and a promotion without ticket sales, not between a regulated draw and an automatically exempt free offer. [AF18]

For example, a promotion that gives qualifying customers a chance to win a prize needs the draw analysis even where the software charges the sponsor rather than the entrant. The economic and operational roles differ, but the prize-selection mechanism remains relevant. A guaranteed benefit issued to every qualifying customer presents a different factual structure and should be documented separately; this chapter does not declare a universal loyalty-programme exemption.

Permit scope and product changes

The regulation's consolidation identifies its latest listed reform as 16 November 2023 and distinguishes draws from cards or equivalent games, dice, roulette and slot machines. Existing permits, their conditions and any applicable transitional or judicial treatment cannot be inferred from the generic statutory categories. [AF18]

For a supplier working with a permit holder, align the deployed version, participating legal entity, customer territory and prize mechanism with the evidence of authorisation. A customer's general claim to have a gaming permit should lead to review of that permit's scope. Changes such as introducing paid entries, repeat purchases, random rewards or redemption can alter the facts on which the original analysis depended.

Practical implications

- Treat permit coverage as specific to the actual activity and operating arrangement.
- Keep promotional draws and guaranteed loyalty benefits separately specified and implemented.

Specific limits
This chapter covers the federal Act and official regulation consolidation. It does not resolve every permit-specific court challenge, transitional right or subsequent administrative interpretation, and does not establish a blanket software-supplier exemption.

Colombia

Colombia regulates games of chance through a statutory monopoly framework. Both paid gaming and certain prize mechanisms without direct participant payment can fall within it. Coljuegos separately publishes a national promotional-game authorisation procedure and an internet-gaming regulatory route. "Free" and "online" therefore answer different classification questions. [AF19] [AF20] [AF21]

Follow the mechanism and the competent authority

Law 643/2001 defines chance games by reference to stakes or payment, uncertain outcomes and prizes, while also addressing qualifying games without direct payment. Its treatment of sports, strength and skill activities does not remove bets placed on them from the gambling framework. The current annotated text is preferable to an old unannotated copy whose exclusions or agency names may no longer reflect the legal position. [AF19]

Coljuegos's procedure expressly covers national games promoting goods, services, establishments or entities where prizes are offered without direct payment for access. Accordingly, a sponsor-funded randomised prize can need authorisation even though the participant pays nothing. Territorial competence and campaign reach matter; the national procedure is not evidence that every locally limited activity has the same filing route. [AF20]

Internet gaming requires more than a website

The internet-gaming regulation, consolidated in Agreement 08/2020, concerns registered participation through an authorised portal, remote wagering and payment, and qualifying random or real-event mechanisms. The permission and technical framework belongs to the game and the operator arrangement. Supplying software or hosting an interface does not itself establish a concession or approval for the proposed game. [AF21]

A meaningful product review therefore connects the operator contract, approved game and certified implementation. Record which components affect randomisation, payout calculation, player identity or the movement of value, and which merely provide general communications. A change in the underlying reward mechanism can be more significant than a redesign of the interface.

A 2026 amendment must be included

The Coljuegos instrument labelled Agreement 01 of 7 May 2026 replaces article 1.3.12 on immediate-prize games. It describes mechanics involving a random-number generator, an established prize plan or multiplier, and player interaction, including withdrawal timing or other actions. It excludes specified lottery mechanics and Keno, and requires a game certificate meeting the defined characteristics. The text makes effect depend on Diario Oficial publication. [AF22]

This update means a review based only on the 2020 agreement, or the limited named-game wording of its 2023 amendment, is incomplete. A game should be classified by its mechanics under the applicable current text. The guide does not determine the original publication event, any correction to the 2026 instrument's numbering or the complete subsequent amendment history. The amendment does not establish approval of a particular game. [AF21] [AF22]

Practical implications

- Use separate product and authorisation analyses for a national promotion, an internet wager and a guaranteed reward.
- Keep certifications and permissions linked to the actual version of the mechanism, rather than only its commercial name.

Specific limits
The guide covers the core statute, promotion procedure, 2020 framework and signed 2026 amendment. It does not provide a complete account of publication and numbering history, later technical requirements, individual concessions or the post-2020 amendment history.

Additional screens: Egypt, Mauritius and Chile

These are limited screening notes. They explain why a country should not be marked available on the basis of a regional analogy; they are not completed country opinions.

Egypt

The Egyptian Consumer Protection Agency provides the official Arabic Consumer Protection Law 181/2018. The guide identifies this source but does not provide a substantive analysis of Egyptian gambling, lottery or promotional-permission rules or establish a lawful online gaming or prize-promotion route. [AF23]

A proposal directed to Egyptian participants needs a fresh review of the actual entry, reward and marketing mechanics against readable current primary materials. A supplier's offshore location, an international customer or a free-entry label should not be treated as an affirmative legal finding.

Mauritius

The Gambling Regulatory Authority's September 2025 communiqué describes a prohibition on direct and indirect gambling advertising and restrictions on sponsorship, with specified exceptions and conditions. It is a concrete reason to review marketing separately from operator licensing: a technically authorised activity does not automatically authorise its acquisition campaign or brand promotion. [AF24]

This screen does not cover the full underlying Act, every licence category or current eligibility for a proposed product. It does not establish Mauritius as an offshore distribution route. The communiqué's narrow exceptions should be read in their own terms, rather than extrapolated into general permission.

Chile

The Superintendencia de Casinos de Juego explains that games of chance require an express legal authorisation and distinguishes licensed casinos from illegal online platforms. Its guidance also rejects the idea that a municipal commercial permit alone authorises gambling. This supports treating an ordinary business registration or foreign licence as insufficient evidence of a domestic route. [AF25]

Any proposed Chilean online offering needs confirmation of the law and permissions effective at deployment, including whether legislative proposals have actually become law. This screen does not cover the later legislative history or provide a separate promotional-contest analysis.

Practical implications

- Keep all three countries outside any unqualified availability statement without a product-specific assessment of the matters outside these screens' scope.

Specific limits
Evidence depth is intentionally narrower than for the six main chapters; these screens must not be counted as full jurisdictional clearance.

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8. Oceania

Current law, future commencement and transitional operation must be kept distinct.

Australia

Australia requires a federal classification and a separate assessment of relevant state or territory rules. An offshore location or a promotional label does not answer either question. [OP01] [OP03]

Federal classification and customer location

The Interactive Gambling Act distinguishes prohibited interactive gambling services from specified excluded categories. Its gambling-service definition includes betting, lotteries and certain games involving chance or mixed chance and skill, money or value and consideration. The Australian-customer link concerns customers physically present in Australia. An assessment therefore needs to connect the actual game and payment mechanics to the correct category, then examine where participation occurs. A skill claim alone does not resolve other definitions or state law. [OP01]

A wholesale-service exclusion is conditional, including the recipient operator and its authorising state or territory licence. It should not be described as a general software-supplier exemption. The practical implication is to distinguish the activity supplied, the operator receiving it and the permission on which the claimed exclusion depends. An agreement describing a party as a technology provider cannot establish those statutory conditions by itself. [OP01]

Promotions and state requirements

New South Wales (NSW) illustrates why a federal promotional category is only one part of the analysis. Its guidance permits entry through goods or services purchased at normal retail value, but prohibits a separate entry or related participation fee. A promotion with total prizes exceeding 10,000 Australian dollars (AUD) requires an authority; the guidance also applies that requirement to online promotions open to NSW residents where the operator is elsewhere. Rules and significant conditions must be accessible before entry. [OP03]

A useful business assessment distinguishes the product being promoted from the draw itself. Price history, independent demand, campaign duration and the relationship between purchases and entries can explain whether the arrangement operates as an ordinary promotion. Those records also make it possible to compare the design against different state rules. The NSW threshold and process should not be copied into another state without checking that state. [OP03]

The change scheduled for January 2027

The Interactive Gambling Amendment (Gambling Reform) Act 2026 tightens the ordinary trade-promotion route: promotion must be the sole or primary purpose, the game incidental to supply, entry fees limited to fair-market-value goods or services, and participation outside ongoing or recurring systems of continuous or repeated draws. Ministerial determinations and the charity limb remain relevant. All Schedules except Schedule 5 commence on 1 January 2027; sections 1-4 commenced on 26 August 2026 and Schedule 5 on 27 August 2026. [OP02]

Continuing products need assessment against both current rules and the enacted changes. A recurring paid-draw business may differ from a short promotion incidental to ordinary goods. [OP02]

Schedule 4 also prevents a trade-promotion licence from defeating section 15AA where the service fails the federal trade-promotion definition. State promotional permission therefore does not establish compliance with that federal definition. [OP02]

Practical implications

- Analyse the operator and each supplied function separately. [OP01]
- Treat customer location and the particular state or territory as substantive facts. [OP01] [OP03]
- Review continuing promotional models before 1 January 2027. [OP02]

Specific limits
The latest federal register page identifies the 2024 compilation and separately flags the 2027 future compilation. State or territory coverage here is illustrative, not exhaustive. Specific licences, ministerial instruments, product facts and later amendments require a targeted review.

New Zealand

New Zealand distinguishes sales promotions from online casino gambling. The 2026 online-casino transition protects a defined incumbent cohort and does not create an open entry period for new providers. [OP04] [OP05] [OP06]

Sales promotions have substantive conditions

The Gambling Act definition links a sales promotion scheme to the sale of goods or services at no more than their usual retail price. It also addresses the announced outcome period, additional direct or indirect consideration and how the outcome is determined. A bundle, subscription or points arrangement therefore needs analysis of what the customer actually buys and pays for. Calling access free does not resolve a price increase or another condition that fails the statutory definition. [OP04]

The remote-interactive-gambling provisions and their exceptions must also be considered. A promotion that fits a descriptive business label does not automatically fit every statutory route for its online implementation. The complete current definition and scope must be checked against the intended supply location, participant location, payment method and prize mechanism. The guide covers selected definitions and exceptions, rather than the complete current Act. [OP04]

An incumbent transition rather than a general launch window

Schedule 1 clause 1 of the Online Casino Gambling Act 2026 applies to providers already conducting the relevant gambling when the clause commenced. For that cohort, an application under section 17 before 1 December 2026 can extend the section 9 prohibition exception until the earlier of the day after the Secretary notifies the provider of a grant or refusal, or 1 June 2027. Otherwise, the transitional exception ends on 1 December 2026. These conditions concern legal operation during transition, not a grant of a licence. [OP05]

Department of Internal Affairs (DIA) guidance updated 10 November 2026 says no new providers may enter during the transition and online-casino advertising remains prohibited. It describes a three-stage process: expression of interest, competitive process and detailed application. Successful auction participation gives a right to apply; suitability still has to be demonstrated. The guidance expects the

licensed market to become fully operational in 2027. It should not be used to describe an auction winner as already licensed. [OP06]

Consequences for launch and exit planning

A supplier or investor needs evidence of the operator's incumbent status and its lawful place in the process. A planned market entry should not rely on a customer's promise that an application will be filed. The timing of deployment, the permitted customer cohort and any advertising restriction should be reflected in release decisions and contracts. These are practical consequences of the conditional transition. [OP05] [OP06]

For providers leaving the market, DIA identifies orderly customer communications, return of account balances and winnings, cessation of New Zealand-facing activity and access restrictions. An exit therefore concerns operational systems and customer obligations as well as a website notice. A continued marketing campaign or new customer acquisition would undermine a claim that the product has been withdrawn. [OP07]

Practical implications

- Treat 1 December 2026 as a specific transition checkpoint for the qualifying cohort. [OP05]
- Verify both application status and the continuing advertising restriction. [OP06]
- Separate promotional-gambling analysis from online-casino licensing. [OP04] [OP05]

Specific limits
The guide covers selected provisions of the 2026 Act and the Gambling Act, together with DIA guidance. It does not cover all regulations, minimum standards or any individual licence or application.

Near-term statutory checkpoints

Date and market	Event and consequence
2026-12-01 New Zealand	Incumbent transition application checkpoint. Only the qualifying incumbent cohort can rely on Schedule 1 clause 1; verify application and continued restrictions. [OP05] [OP06]
2027-01-01 Australia	Substantive reform Schedules commence. All Schedules except Schedule 5 commence under the original commencement table; reassess recurring promotional structures. [OP02]
2027-06-01 New Zealand	Outer date in the transitional clause. Qualifying application exception ends earlier if the specified decision point occurs. Do not treat this as a guaranteed operating period. [OP05]

LICENTIUM GUIDE

9. Sources

The register contains 81 source records. Each entry gives the title, legal status, relevant provision or passage, stated source date and link. The entries identify the propositions supported and the guide's scope limits. Each title opens the cited resource; bracketed references in the guide link to the corresponding entry.

North America and Europe

[R01] New York Penal Law section 225.00

www.nysenate.gov | Consolidated statute

Pinpoint: Subsections 1, 2, 4 and 6

Date or effect: Displayed revision 15 May 2015

Supports: Material chance, staking value and material assistance are distinct elements.

Limit: *Selected provisions; no assessment of a particular product or complete federal/state law.*

[R02] New York Racing, Pari-Mutuel Wagering and Breeding Law section 912

www.nysenate.gov | Consolidated statute

Pinpoint: Subsections 1 and 2

Date or effect: Displayed revision 12 December 2025

Supports: Defined online dual-currency sweepstakes games and specified supporting activities are prohibited.

Limit: *Exact definition and commission determination matter; not a prohibition of every promotion.*

[R03] New York Senate Bill S5935A Chapter 605

www.nysenate.gov | Legislative history

Pinpoint: Action dated 5 December 2025; enacted amendment

Date or effect: Signed 5 December 2025

Supports: Confirms enactment of section 912.

Limit: *Read the enacted amended bill, not the original proposal.*

[R04] Florida Statutes section 849.094

www.flsenate.gov | 2026 consolidated statute

Pinpoint: Subsections 1 to 5, 8(b) and 10

Date or effect: 2026 edition

Supports: Qualifying promotions cannot require entry payment; greater-than-$5,000 schemes have filing and security duties.

Limit: *Specific exclusions and security waiver provisions apply; compliance does not authorise another gambling offence.*

[R05] California Gambling Law Regulations and Resource Information

www.cgcc.ca.gov | Official statutory compilation

Pinpoint: Edition cover; contents listing Penal Code section 337o and Business and Professions Code section 17539.1

Date or effect: Current to 1 October 2026

Supports: Identifies the current statutory locations for the sweepstakes amendments.

Limit: *The guide does not set out the detailed operative provisions; R06 supports only the stated regulator summary.*

[R06] California Gambling Control Commission 2025 chaptered legislation

www.cgcc.ca.gov | Official regulator summary

Pinpoint: AB 831 Chapter 623; commencement heading

Date or effect: Changes effective 1 January 2026 unless otherwise specified

Supports: Addresses digital simulated gambling, online sweepstakes and limited incidental commercial promotions.

Limit: *Summary is not the complete elements of Penal Code section 337o or Business and Professions Code section 17539.1.*

[R07] Canada Criminal Code section 206

laws-lois.justice.gc.ca | Consolidated federal statute

Pinpoint: Subsection 1(a) to (g), especially 1(f)

Date or effect: Current to 29 October 2026; last amended 18 July 2026

Supports: Different offences address chance schemes and paid mixed chance/skill arrangements.

Limit: *The guide does not cover amendments after the consolidation date or all relevant cases.*

[R08] Canada Criminal Code section 207

laws-lois.justice.gc.ca | Consolidated federal statute

Pinpoint: Subsection 1 and statutory conditions

Date or effect: Current to 29 October 2026

Supports: Provincial conduct-and-manage arrangements and specified licensed routes have their own conditions.

Limit: *No general commercial permit or nationwide private-operator licence follows from this section.*

[R09] Canada Competition Act section 74.06

laws-lois.justice.gc.ca | Consolidated federal statute

Pinpoint: Paragraphs (a) to (c)

Date or effect: Current to 29 October 2026

Supports: Promotional contest rules address prize/chance disclosure, distribution delay and selection.

Limit: *Consumer-promotion compliance does not resolve the Criminal Code or provincial requirements.*

[R10] iGaming Ontario What We Do

igamingontario.ca | Official operational guidance

Pinpoint: Operator entry; AGCO and iGO roles

Date or effect: The guide does not state a source date.

Supports: Private operators require AGCO registration and an iGO operating agreement before offering games in Ontario.

Limit: *Actual registration, agreement, standards and business facts must be checked.*

[R11] iGaming Ontario Steps to Join the Ontario Market

igamingontario.ca | Official operational guidance

Pinpoint: Supplier Readiness; steps and links

Date or effect: The guide does not state a source date.

Supports: Some suppliers require AGCO registration and technology certification by a registered testing laboratory.

Limit: *Do not assume every supplier needs the same registration; the guide does not set out the complete current AGCO criteria.*

[R12] Quebec Act 2023 chapter 24 Bill 17

www.publicationsduquebec.gouv.qc.ca | Enacted amending statute

Pinpoint: Sections 78 to 94 and 99; Gazette pp. 2956-2959

Date or effect: Assent 27 October 2023; official Gazette 29 November 2023

Supports: Repeals the specific publicity-contest chapter and rules; preserves old rules for contests received before the transition.

Limit: *Other federal and provincial consumer, language and privacy duties are not determined by this repeal.*

[R13] Gambling Commission Free draws and prize competitions

www.gamblingcommission.gov.uk | Official regulator guidance

Pinpoint: Free-route and skill-competition sections

Date or effect: Last updated 23 October 2024

Supports: Explains publicity, cost, convenience and equal allocation for free routes and the skill threshold.

Limit: *Guidance is not advance approval; read with the statute and the distinction between lotteries and gaming.*

[R14] Gambling Act 2005 Schedule 2

www.legislation.gov.uk | Consolidated statute

Pinpoint: Paragraphs 2 to 8

Date or effect: Commencement annotations from 1 October 2005

Supports: Payment includes price reflecting participation; normal communications and qualifying free-route choices have specific treatment.

Limit: *Lottery payment rules must not be transplanted into every gaming category.*

[R15] Gambling Act 2005 section 6

www.legislation.gov.uk | Consolidated statute

Pinpoint: Subsections 1 to 5

Date or effect: Commencement annotation 1 October 2005

Supports: Gaming can include mixed chance and skill and does not always require risking a loss.

Limit: *Read exemptions and other provisions for the particular activity; this is not a complete licensing assessment.*

[R16] Gambling Commission Prize competitions and free draws

assets.ctfassets.net | Official guidance quoting section 14(5)

Pinpoint: Paragraphs 2.1 to 3.17, especially 3.2 to 3.3

Date or effect: December 2009; still linked from current guidance

Supports: The significant-proportion test can be met by the entry barrier or the prize-success barrier.

Limit: *Historical guidance, rather than a consolidated Act; the guide covers its quoted explanation of section 14.*

[R17] Gambling Commission When is a licence required

www.gamblingcommission.gov.uk | Official regulator guidance

Pinpoint: Supply, installation, manufacture and adaptation

Date or effect: The guide does not state a source date.

Supports: Role-specific software licensing can apply separately from an operator licence.

Limit: *Scope, territorial connection, licence conditions and possible group arrangements require separate assessment.*

[R18] France Code de la sécurité intérieure article L320-1

www.legifrance.gouv.fr | Consolidated statutory provision

Pinpoint: Article L320-1

Date or effect: Version in force from 1 January 2020; code update 1 September 2026

Supports: Public gain, at least partial chance and financial sacrifice; refundable advances remain relevant.

Limit: *The guide does not cover the full current consolidated regime; the original French controls.*

[R19] France Code de la sécurité intérieure article L320-6

www.legifrance.gouv.fr | Consolidated statutory provision

Pinpoint: Paragraph 7 and relationship with L320-1

Date or effect: 2026 versions

Supports: Includes the advertising operations referred to in Consumer Code L121-20.

Limit: *Older L322-2-series provisions are repealed; do not cite them as current authority.*

[R20] France Code de la consommation article L121-20

www.legifrance.gouv.fr | Consolidated statutory provision

Pinpoint: Advertising lotteries; relationship with L121-1

Date or effect: Version in force 6 November 2026

Supports: Promotional random-benefit practices are prohibited where unfair under the consumer-law test.

Limit: *Does not establish a general remote-casino authorisation or settle a particular promotion.*

[R21] ANJ Games with monetisable digital objects JONUM

www.anj.fr | Official regulator guidance

Pinpoint: Legal framework, prior declaration, eligible operators, rewards and frequently asked questions (FAQ)

Date or effect: Decree 2026-60 effective 7 February 2026, as stated by ANJ

Supports: A specific experimental regime covers qualifying paid online chance games with monetisable digital objects.

Limit: *The guide does not provide a complete analysis of the underlying statute, decree or product-specific conditions; a declaration is not blanket approval.*

[R22] Germany Interstate Treaty on Gambling 2021 section 3

www.gesetze-bayern.de | Official consolidated treaty text

Pinpoint: Subsections 1 to 4

Date or effect: Displayed version applicable from 1 January 2023

Supports: Payment for a winning chance and wholly/predominantly chance; participation location establishes territorial connection.

Limit: *English explanation is a paraphrase; examine applicable Land law and cases.*

[R23] Germany Interstate Treaty on Gambling 2021 section 4

www.gesetze-bayern.de | Official consolidated treaty text

Pinpoint: Subsections 1 to 5

Date or effect: Displayed version applicable from 1 January 2023

Supports: Public gambling requires permission; internet permission is limited to listed categories; payment participation also matters.

Limit: *Category-specific chapters, permit conditions and the competent authority require separate assessment.*

[R24] CJEU Liga Portuguesa and Bwin C-42/07

eur-lex.europa.eu | Court judgment

Pinpoint: Judgment 8 September 2009; paragraphs 53 to 54 and 67 to 73; operative conclusion

Date or effect: 8 September 2009

Supports: Lawful provision in another Member State does not itself establish entitlement to offer the same internet gambling service in the destination state.

Limit: *Case-specific proportionality analysis; not approval of every national restriction or an exhaustive later-case review.*

[R25] Gespa Sales promotion games

www.gespa.ch | Official regulator guidance

Pinpoint: Regular promotions and mass-media competitions; Gambling Act article 1(2)(d),(e)

Date or effect: The guide does not state a source date.

Supports: Swiss exclusions depend on purpose, duration, addiction risk, market price or equal free access.

Limit: *Screening only; the complete federal and cantonal regime and individual schemes are outside the guide's scope.*

Asia and the Middle East

[AS01] Singapore Gambling Control Act 2022

sso.agc.gov.sg | Enacted statute; selected provisions

Pinpoint: Sections 5, 8, 9 and 10; definition and territorial/operator provisions

Date or effect: Main provisions commenced 1 August 2022

Supports: Lottery analysis reaches chance at any stage and can cover participation without payment; supplier/operational functions need separate analysis.

Limit: *Selected provisions only; the full current consolidation and complete amendment and commencement history are outside the guide's scope.*

[AS02] Singapore Gambling Control Remote Games of Chance Class Licence Order 2022 S 681

sso.agc.gov.sg | Subsidiary legislation; selected provisions

Pinpoint: Paragraphs 3-8 and schedules; particularly free-play definition, Type 1 and Type 2 conditions

Date or effect: 15 August 2022; 2022 version

Supports: Free-play and token rules are conditional. Type 2 restricts licensee/associate conversion services; a virtual currency label is insufficient.

Limit: *The guide does not set out the full current schedules or all Type 2 eligibility conditions.*

[AS03] Singapore Gambling Control Trade and Other Promotional Games and Lotteries Class Licence Order 2022 S 660

sso.agc.gov.sg | Subsidiary legislation; selected provisions

Pinpoint: Paragraphs 2-3, 7-12 and schedules

Date or effect: Part 3 commenced 1 February 2023; current-version heading 23 November 2026

Supports: Trade promotion has its own class-licence route and conditions for advertising, information, non-instant games and winner notification.

Limit: *The guide does not set out every operative definition, exclusion and condition. The route is not a general casino permission.*

[AS04] Singapore GRA Class Licences

www.gra.gov.sg | Regulator guidance

Pinpoint: Class Licences introduction and conditions

Date or effect: The guide does not state a source date.

Supports: No application or notification is required for the described class regime, but every applicable condition must be met.

Limit: *Guidance does not replace the relevant order or establish that a particular product is covered.*

[AS05] Hong Kong Trade Promotion Competition Licence Application Forms and Guide

www.hadla.gov.hk | Official licensing guide with statutory extract and licence conditions

Pinpoint: Printed pp 2, 4-6, 11-13; Chapter II section 22 extract; Chapter III conditions; FAQs 6, 15-16

Date or effect: Revision December 2025

Supports: The route requires a licence; conditions include no entry fee or money prize. Internet competitions can require the same licence.

Limit: *The guide does not determine current issued conditions or product-specific eligibility, or provide a complete Ordinance analysis.*

[AS06] Hong Kong OLA Entertainment Licensing Frequently Asked Questions

www.hadla.gov.hk | Official regulator guidance quoting Cap 148

Pinpoint: Trade Promotion Competition Licence and Amusements with Prizes Licence sections

Date or effect: The guide does not state a source date.

Supports: Gaming can cover combined chance and skill without participant loss; cumulative and independent draws differ; overseas applicants may need a local agent.

Limit: *Guidance illustrates application; it does not replace a current statutory or case-law analysis.*

[AS07] India Promotion and Regulation of Online Gaming Act 2025 Act 32

www.meity.gov.in | Enacted statute with corrigenda in official publication

Pinpoint: Sections 1-2, 5-8 and 18; definitions of e-sport, online money game, online social game and other stakes

Date or effect: Assent 22 August 2025; commencement 1 May 2026 under AS08

Supports: Defined online money games cover skill, chance or both. Offering, advertising and payment facilitation are prohibited; distinct conditions govern social games and e-sports.

Limit: *A source footnote contains a date inconsistency. The guide uses the original assent date and the separate commencement notification; it does not cover all later court orders.*

[AS08] India S.O. 1994(E), Act commencement notification

www.meity.gov.in | Original Gazette commencement notification

Pinpoint: S.O. 1994(E), English operative paragraph

Date or effect: Made 22 April 2026; appoints 1 May 2026

Supports: The Act itself commenced on 1 May 2026.

Limit: *Commencement does not establish the absence or effect of later judicial or administrative orders.*

[AS09] India Promotion and Regulation of Online Gaming Rules, 2026, G.S.R. 303(E)

www.meity.gov.in | Gazetted rules

Pinpoint: Rules 1-2, 6, 8-15, especially rules 8, 10(2), 12 and 13

Date or effect: Made 22 April 2026; commenced 1 May 2026

Supports: Determination and registration have separate triggers and game/provider-specific effects. Economic design, payment changes and separate e-sport recognition requirements matter.

Limit: *The guide does not cover every later category notification or direction, or individual determination and registration status.*

[AS10] India Supreme Court office report in T C Civil 133 of 2025 and connected gaming cases

api.sci.gov.in | Court office report, not a merits judgment

Pinpoint: Cover and pp 1, 5; quoted procedural orders and connected challenges

Date or effect: Listed 28 April 2026; reports earlier orders

Supports: The Act was challenged in connected proceedings; the office report does not decide validity or provide current interim relief.

Limit: *The guide does not cover the complete subsequent order history. The existence of litigation does not establish a stay.*

[AS11] UAE GCGRA Licensing

www.gcgra.gov.ae | Official regulator guidance

Pinpoint: Licensing introduction and Applying for a licence

Date or effect: The guide does not state a source date.

Supports: GCGRA states prior licensing is required and reaches facilitation and related service providers; applicants first contact the regulator for assessment.

Limit: *Guidance is not the underlying statute or an approval for a specific business.*

[AS12] UAE GCGRA License Types

www.gcgra.gov.ae | Official regulator guidance

Pinpoint: Entity and individual categories

Date or effect: The guide does not state a source date.

Supports: Operator, gaming-related vendor, corporate key-person, individual key-person and gaming-employee categories are distinct; multiple licences may be required.

Limit: *The guide does not determine specific conditions, eligibility or acceptance of a particular application.*

[AS13] UAE GCGRA Activities We Regulate

www.gcgra.gov.ae | Official regulator guidance

Pinpoint: Lottery, Internet Gaming and Sports Wagering

Date or effect: The guide does not state a source date.

Supports: The described internet-gaming perimeter includes games involving chance, skill or both.

Limit: *Examples do not decide whether every product bearing the same label is licensed or lawful.*

[AS14] UAE GCGRA Our Licensees

www.gcgra.gov.ae | Official public licence register

Pinpoint: Lottery, land-based, vendor, internet-gaming and sports-wagering lists

Date or effect: The guide does not state a source date.

Supports: The register lists Coin Technology Projects LLC for internet gaming and sports wagering, alongside separate operator and vendor categories.

Limit: *A public listing does not state every licence condition, territorial limit or product approval, and does not authorise another entity.*

[AS15] UAE GCGRA Legislation

www.gcgra.gov.ae | Official regulator description of legal framework

Pinpoint: Founding-law reference and compliance expectations

Date or effect: Refers to Federal Law by Decree 30 of 2022

Supports: Identifies the founding commercial-gaming law and technical/regulatory obligations, including safer-gaming tools.

Limit: *The guide does not analyse the underlying Federal Law by Decree 30 of 2022 text or the complete criminal-law interface.*

[AS16] Dubai VARA Licence Applications

www.vara.ae | Official regulator guidance

Pinpoint: Jurisdiction statement and two-stage application process

Date or effect: The guide does not state a source date.

Supports: VARA covers relevant virtual-asset activity in/from Dubai excluding DIFC; approval to incorporate does not permit activity.

Limit: *This source concerns virtual assets, not commercial-gaming authorisation. ADGM/DIFC rules require separate assessment.*

[AS17] Bahrain Application for licensing promotional campaigns and discounts

www.bahrain.bh | Official government service catalogue

Pinpoint: Service description, attachments, legal regulations and process

Date or effect: The guide does not state a source date.

Supports: Promotional campaigns have a licence process and require campaign/prize evidence; the catalogue cites Order 1/1993.

Limit: *The catalogue is not a full instrument or issued licence; actual conditions and current requirements must be obtained.*

[AS18] Bahrain Ministry of Industry and Commerce Regulations

moic.bh | Official legislation index

Pinpoint: Consumer Protection section; Order 1/1993 and 2026 amendment listing

Date or effect: Listing includes Law 28/2026 amending Law 35/2012

Supports: The official index lists the promotional-campaign order and a 2026 consumer-protection amendment.

Limit: *The guide does not set out the current order or amendment text or determine commencement; the index supports no article-level conclusion.*

[AS19] Bahrain Penal Code Decree Law 15 of 1976

lloc.gov.bh | Statutory text on official legislation portal

Pinpoint: Article 308, Arabic statutory text

Date or effect: 1976 instrument

Supports: Public-place gambling and organising/providing means for public gambling are addressed; the definition concerns chance-dependent gain or loss.

Limit: *The cited PDF and HTML versions differ on a repeat-offence penalty. No penalty amount is stated; online scope and the complete amendment history are outside the guide's scope.*

[AS20] Japan Penal Code

laws.e-gov.go.jp | Official Japanese statute; selected provisions

Pinpoint: Articles 185-186

Date or effect: 2025 version

Supports: Gambling and profitable gambling operations are addressed; a narrow momentary-entertainment qualification appears in Article 185.

Limit: *Screening only. The guide establishes no general online commercial-game exemption or current penalty.*

[AS21] Republic of Korea Criminal Act English translation

elaw.klri.re.kr | Official institutional translation of historical statutory consolidation

Pinpoint: Articles 246-248; version header

Date or effect: Header Act 14178, 29 May 2016

Supports: Historical translation distinguishes gambling, profit-making provision of gambling space, and unauthorised lottery tickets.

Limit: *Historical screening comparison only. The guide does not set out current Korean law or the relevant sector laws.*

[AS22] Saudi Ministry of Commerce commercial competition requirements

mc.gov.sa | Official ministry statement

Pinpoint: Announcement on licensing, entry and advertised terms

Date or effect: 21 September 2025

Supports: The Ministry describes prior licensing, no purchase condition, price restrictions, supervision and prize delivery obligations.

Limit: *Screen only. Exact current regulations and campaign permit prevail; no general gambling authorisation is implied.*

[AS23] Qatar Penal Code Law 11 of 2004

www.almeezan.qa | Official statutory English text; selected provision

Pinpoint: Article 274; official government PDF Articles 275-276

Date or effect: Article effective 14 June 2004; portal status: in force

Supports: The definition combines uncontrolled chance with an agreed money or other benefit transfer on loss.

Limit: *Screening only. The complete current penal and promotion-licensing rules are outside the guide's scope; absence of one element is not general market permission.*

[AS24] India PIB explanation of the 2026 online gaming rules

www.pib.gov.in | Official government explanation, not statutory text

Pinpoint: Rules introduction and implementation overview

Date or effect: 22 April 2026

Supports: Explains the policy separation between prohibited online money games and supported social games/e-sports.

Limit: *Use the Act, notification and Rules for operative conclusions; this statement does not establish later court status.*

Africa and Latin America

[AF01] South Africa: National Gambling Act 7 of 2004

www.gov.za | Enacted national statute; official original Gazette PDF.

Pinpoint: Sections 3-6, 8-11 and 37-39.

Date or effect: Government landing page records commencement on 1 November 2004.

Supports: Consideration and valuable payouts; skill does not itself exclude a gambling game; interactive-game restriction; separate national supplier and testing categories.

Limit: *Original enactment. The guide does not provide a complete current provincial and national consolidation.*

[AF02] South Africa NGB: Frequently Asked Questions

www.ngb.org.za | Regulator guidance.

Pinpoint: Questions on online gambling, online betting, overseas gambling and licensing.

Date or effect: Undated page.

Supports: Distinguishes interactive gambling prohibition from licensed South African online bookmaking; identifies provincial licensing authorities.

Limit: *Guidance does not decide the classification or conditions of an individual product.*

[AF03] South Africa: Consumer Protection Act 68 of 2008

www.gov.za | Enacted consumer-protection statute; official PDF.

Pinpoint: Section 36, promotional competitions.

Date or effect: Original enactment.

Supports: Separate regime for promotions, entry consideration, rules and misleading prize statements.

Limit: *No product-specific opinion or complete account of later amendments.*

[AF04] South Africa: Consumer Protection Regulations, GN R293 of 2011

www.gov.za | Official Gazette regulation.

Pinpoint: Regulation 11, promotional competitions.

Date or effect: Publication 31 March 2011.

Supports: Independent oversight and specified records retained for at least three years; electronic-entry cost and participation conditions.

Limit: *Original 2011 text; the guide does not state a current fee ceiling.*

[AF05] Kenya: Gambling Control Act 14 of 2025, revised text

new.kenyalaw.org | Enacted text; implementation affected by litigation.

Pinpoint: Header; section 28; sections 120-122.

Date or effect: Revised text states 20 August 2025; the guide also identifies conflicting 26 August evidence.

Supports: Licensing categories include online games, software/platform provision and prize promotions; repeal and licence transition provisions.

Limit: *The guide does not determine the complete operative court-order scope or resolve the commencement-date differences.*

[AF06] Wati v Attorney General [2026] KEHC 16214 (KLR), 21 October 2026

sheriahub.com | High Court ruling reproduced on a secondary host.

Pinpoint: Paragraphs 4-11 and 18-20.

Date or effect: 21 October 2026 ruling; records earlier interim orders.

Supports: Records August conservatory relief, JRE251 variation, referral for administrative directions and temporary proceedings stay.

Limit: *The complete E533/E611/E612/JRE251 order history and later directions are outside the guide's scope. The ruling contains inconsistent August dates.*

[AF07] Kenya Parliament: October 2026 Statutory Instruments Tracker

www.parliament.go.ke | Official parliamentary status tracker.

Pinpoint: Entries 86-91: LN111-116 of 2026.

Date or effect: Source label: 23 October 2026; status stamp: 30 October 2026 at 21:54.

Supports: Marks licensing and five related gambling regulations stayed by a court order; records receipt on 8 July 2026.

Limit: *Administrative summary rather than the operative court orders. The source label and status date differ; the guide does not determine the complete current position.*

[AF08] Kenya Parliament repository: Licensing Regulations LN111/2026 catalogue

libraryir.parliament.go.ke | Official repository metadata.

Pinpoint: dc.date.issued, provenance and original-bundle description.

Date or effect: Catalogue issued date 15 July 2026; repository accession 29 July 2026.

Supports: Identifies LN111 and its repository dates; does not reconcile the earlier date in the tracker.

Limit: *Repository metadata does not establish Gazette publication or legal commencement; the guide does not determine the underlying notice dates.*

[AF09] Kenya Law: Kenya Revenue Authority Act amendment history

new.kenyalaw.org | Official statutory history.

Pinpoint: History entry for amendment by Gambling Control Act 14/2025.

Date or effect: History records amendment on 26 August 2025.

Supports: Provides official indirect evidence of a 26 August date against the Gambling Control Act revised header's 20 August.

Limit: *This amendment-history entry does not establish the original Gambling Control Act Gazette commencement date.*

[AF10] Nigeria Supreme Court: SC1/2008, judgment of 22 November 2024

lslga.org | Certified Supreme Court judgment hosted by Lagos State Lotteries and Gaming Authority.

Pinpoint: Judgment pages 68-71, especially orders 5 and 8 on pages 69-70.

Date or effect: 22 November 2024.

Supports: Order 5 confines National Assembly competence to FCT; order 8 nullifies the entire National Lottery Act; related injunctions address plaintiff states.

Limit: *Does not establish a replacement FCT statute or review every subsequent legal development.*

[AF11] Lagos State Lotteries and Gaming Authority: Gaming Categories

lslga.org | Current official regulator category page.

Pinpoint: Published list of categories and requirements links.

Date or effect: The guide does not state a source date or complete effective-date history.

Supports: Lists promotional raffle, online gaming, facilitation, B2B and gamification among its categories.

Limit: *The category list neither licenses an individual business nor supplies all category conditions or other-state requirements.*

[AF12] Brazil: Medida Provisória 1,394 of 25 September 2026

legis.senado.leg.br | Provisional measure; subject to legislative and constitutional processes.

Pinpoint: Articles 1-7 and 29-30.

Date or effect: Article 30: publication; measure dated 25 September 2026.

Supports: Prohibition and wind-down provisions for fixed-odds betting, including relevant offshore offers and intermediation/advertising.

Limit: *Does not by itself establish the effect of later operator-specific orders, constitutional review or final legislative treatment.*

[AF13] Brazil: Ato do Presidente da Mesa 118 of 10 November 2026

www2.camara.leg.br | Congressional extension act.

Pinpoint: Operative extension of MP 1,394/2026.

Date or effect: 10 November 2026 act; extends validity for sixty days.

Supports: Extends the provisional measure's validity; not its conversion into permanent legislation.

Limit: *The guide does not cover the complete later legislative history.*

[AF14] Brazil STF: ADI 8027 interim decision of 8 November 2026

portal.stf.jus.br | Judicial interim order, ad referendum of the plenary.

Pinpoint: Signed decision, pages 5-6 operative order; pages 1-2 procedural history.

Date or effect: 8 November 2026.

Supports: Stays ordinary-court constitutional proceedings concerning MP 1,394; distinguish this from suspending the measure itself.

Limit: *The complete subsequent docket and all individual relief are outside the guide's scope; procedural history is not a nationwide substantive holding.*

[AF15] Brazil: Law 5,768/1971, compiled text

www.planalto.gov.br | Official compiled federal statute.

Pinpoint: Articles 1-3, especially article 1 section 3 and article 3 II.

Date or effect: Enactment 20 December 1971.

Supports: Authorisation for free prize promotions; cash restrictions; narrow cultural/artistic/sport/recreation contest exception.

Limit: *Does not resolve every subordinate promotion rule or a campaign-specific SPA decision.*

[AF16] Brazil SPA: Commercial Promotion guidance and frequently asked questions

www.gov.br | Official regulator guidance.

Pinpoint: Authorisation/SCPC guidance; question on objective guaranteed loyalty and discount rewards.

Date or effect: The guide does not state a source date.

Supports: Explains commercial-promotion administration and distinguishes certain guaranteed benefits from prize-selection mechanisms.

Limit: *Guidance is not a ruling that every loyalty scheme or contest qualifies for an exception.*

[AF17] Mexico: Ley Federal de Juegos y Sorteos

www.diputados.gob.mx | Official federal statute PDF.

Pinpoint: Articles 1-4.

Date or effect: 31 December 1947 publication; official index lists the Act without reform.

Supports: Federal prohibition/permission structure and Secretaría de Gobernación (SEGOB) authority for betting games and draws.

Limit: *Does not establish the scope of any individual permit or resolve later case law.*

[AF18] Mexico: Reglamento de la Ley Federal de Juegos y Sorteos

www.diputados.gob.mx | Official regulation consolidation.

Pinpoint: Articles 2-3, 91 and 109-111; reform notes.

Date or effect: Consolidation identifies latest listed reform as 16 November 2023.

Supports: Unlisted activities restricted; promotional draws without ticket sales remain an authorisation category; specified casino games excluded from draw definition.

Limit: *Individual permit conditions, court relief and transitional rights require separate review.*

[AF19] Colombia: Ley 643 de 2001, annotated compilation

jurinfo.jep.gov.co | Official judiciary-hosted legislative compilation.

Pinpoint: Articles 1-5 and 7; amendment and constitutional annotations.

Date or effect: Published 17 January 2001.

Supports: Monopoly framework; games involving chance and value and certain no-direct-payment games; treatment of skill activities and bets on them.

Limit: *The guide does not apply every statutory exception and judicial annotation to a particular mechanic.*

[AF20] Coljuegos: Trámites para Juegos Promocionales

www.coljuegos.gov.co | Official regulator procedure page.

Pinpoint: Autorización de Juegos Promocionales de Carácter Nacional.

Date or effect: Page last modified 12 November 2021.

Supports: National promotional-game authorisation concerns public prizes without direct payment to access the game.

Limit: *Older page; not a complete current submission manual or determination of territorial competence.*

[AF21] Colombia: Coljuegos Agreement 08/2020, Title 1

normograma.superservicios.gov.co | Official government-hosted regulatory compilation.

Pinpoint: Title 1: internet games, operator and technical framework.

Date or effect: 16 September 2020; read together with later amendments, including AF22.

Supports: Registered participation, authorised portal and game mechanisms within the internet regime.

Limit: *The 2020 compilation alone is insufficient for current approval; the guide does not cover the complete later technical and amendment history.*

[AF22] Coljuegos: PDF labelled Agreement 01 of 7 May 2026

www.coljuegos.gov.co | Signed regulator amendment text linked from official announcement.

Pinpoint: Articles 1-2, pages 3-4; explanatory history on pages 1-2.

Date or effect: Dated 7 May 2026; article 2 makes effect depend on Diario Oficial publication.

Supports: Replaces immediate-prize definition with mechanics involving random-number generators, prizes/multipliers and player interaction; excludes specified lottery mechanics and Keno.

Limit: *The guide does not determine the original publication event or any correction to numbering; the amendment is not a game-specific authorisation.*

[AF23] Egypt Consumer Protection Agency: Law 181/2018

cpa.gov.eg | Official consumer-protection statute source.

Pinpoint: Official legislative index and linked 32-page Arabic law file.

Date or effect: 2018 law.

Supports: Establishes the primary source location only.

Limit: *The guide does not provide an Egyptian gambling, promotion or licence analysis or establish permission.*

[AF24] Mauritius GRA: Advertising and Sponsorship in the Gambling Sector

gra.govmu.org | Official regulator public notice.

Pinpoint: One-page communiqué, advertising and sponsorship restrictions and exceptions.

Date or effect: 12 September 2025 notice.

Supports: Direct/indirect advertising prohibition and sponsorship restrictions with specified exceptions.

Limit: *The full underlying Act, amendments and product-specific licensing categories are outside the guide's scope.*

[AF25] Chile SCJ: ¿Cuál es el juego ilegal?

www.scj.gob.cl | Official regulator guidance.

Pinpoint: Explanation of express legal authorisation, online platforms and municipal permits.

Date or effect: The guide does not state a publication date.

Supports: Express legal authority required; distinguishes authorised casinos from illegal online platforms; municipal permits are insufficient.

Limit: *Later legislative history and separate promotional-contest rules are outside this screen's scope.*

Oceania

[OP01] Interactive Gambling Act 2001, compilation 24

www.legislation.gov.au | Consolidated federal statute

Pinpoint: ss 4, 5, 8, 8BB, 15, 15AA; latest-version page

Date or effect: Compilation 14 October 2024; C2024C00646

Supports: Current federal definitions, Australian-customer link and conditional trade-promotion/wholesale exclusions.

Limit: *State and territory permissions and applicable instruments remain separate. The future 2027 compilation must not replace current text.*

[OP02] Interactive Gambling Amendment (Gambling Reform) Act 2026, No. 72

www.legislation.gov.au | Enacted amending Act with staged commencement

Pinpoint: Sections 1-4; Schedule 4 items 9, 13 and 14 amending sections 8BB and 15AA

Date or effect: Sections 1-4: 26 August 2026; Schedule 5: 27 August 2026; other Schedules: 1 January 2027

Supports: Changes trade-promotion conditions and prevents a trade-promotion licence from bypassing section 15AA where the federal definition is not met.

Limit: *As-made table describes original commencement. Current state rules and ministerial instruments also require assessment.*

[OP03] NSW Government trade promotions guidance

www.nsw.gov.au | Official state guidance explaining Community Gaming Act 2018 and Regulation 2020

Pinpoint: Entry requirements; authority threshold; advertising; online promotions

Date or effect: The guide does not state a source date.

Supports: Normal-retail-value purchases may qualify; separate entry fees do not. Authority threshold exceeds AUD 10,000 and reaches promotions open to NSW residents.

Limit: *NSW example only; do not extrapolate its threshold or procedure across Australia.*

[OP04] New Zealand Gambling Act 2003

www.legislation.govt.nz | Consolidated statute; selected provisions

Pinpoint: s 4 definitions of sales promotion scheme and remote interactive gambling

Date or effect: Version as at 6 June 2026

Supports: Sales-promotion category has normal-price, timing, consideration and outcome conditions; remote-interactive scope must be examined separately.

Limit: *The guide covers selected definitions and exceptions, rather than the complete current Act and amendment history.*

[OP05] New Zealand Online Casino Gambling Act 2026

www.legislation.govt.nz | Enacted statute; selected operative provisions

Pinpoint: s 2; Schedule 1 clause 1, including paragraphs (1)-(3)

Date or effect: Main commencement 1 May 2026; specified provisions 1 December 2026 and 1 January 2027

Supports: Transition is limited to providers operating at commencement. A qualifying application before 1 December can extend the s 9 exception to the earlier specified decision point or 1 June 2027.

Limit: *The guide covers selected provisions, rather than the complete Act and current subordinate requirements.*

[OP06] Department of Internal Affairs information about online casino licensing

www.dia.govt.nz | Current regulator implementation guidance

Pinpoint: Current requirements; licensing timeline; stages 2-3

Date or effect: Updated 10 November 2026

Supports: No new providers during transition; advertising prohibited; incumbent application deadline and staged licensing explained.

Limit: *Guidance is not an issued licence. The guide does not assess a specific applicant or cover all regulations and minimum standards.*

[OP07] Department of Internal Affairs information for the unlicensed market

www.dia.govt.nz | Official regulator guidance

Pinpoint: Preparing to exit; 1 December 2026 restrictions

Date or effect: The guide does not state a source date.

Supports: Exit preparation includes customer communication, return of funds, stopping New Zealand-facing activities and access restrictions.

Limit: *No assessment of any operator or its contractual obligations.*

LICENTIUM GUIDE

10. Use and legal notices

Read these notices with the specific qualifications in each chapter.

1. Purpose and scope

This guide provides general information about selected product mechanics and market-entry issues. It is not legal, regulatory, tax, accounting, investment or other professional advice, and it is not a determination that any product or activity is lawful.

2. Date and legal change

Edition 25 November 2026. The law is stated as at 24 November 2026. The source register states individual consolidation and document dates. Laws, guidance, permissions and court orders can change. Obtain the current controlling material before acting.

3. Selected markets and issues

The jurisdictions and issues are selected comparisons. The guide does not cover every territory, activity, exemption, duty or enforcement position. A country chapter is not a complete jurisdictional opinion.

4. Facts and application

No actual client product, launch, permission or operating arrangement has been assessed. Conclusions depend on the implemented mechanics and complete facts, including linked products, associated entities, territorial access and actual reward value.

5. Sources and language

The register distinguishes legislation, judgments and regulator guidance. The chapters state the guide's coverage and limits. English explanations of foreign-language sources are summaries; the controlling original text and its legal context prevail.

6. Permissions and regulatory status

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7. Other legal regimes

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