



**I-GAMING LICENSING AND REGULATION GROUP**  
Electronic Gaming Licensing Department

**MEMORANDUM**

09 October 2025

TO : ALL GAMING SYSTEM ADMINISTRATORS  
ALL GAMING VENUE OPERATORS  
ALL LICENSEES OF INTEGRATED RESORTS  
ALL GAMING AFFILIATES  
ALL SUPPORT SERVICE PROVIDERS  
ALL APPLICANTS AND CONCERNED PARTIES

FROM : THE ASSISTANT VICE PRESIDENT II

SUBJECT : TRANSITION GUIDELINES FOR THE EXISTING BUSINESS-TO-BUSINESS (B2B) PROVIDERS AND IMPLEMENTATION OF THE REGULATORY FRAMEWORKS

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Please be informed that the PAGCOR's Board of Directors, in its meeting held on 02 October 2025, approved the following:

1. Imposition of a transition period until 31 March 2026 for the implementation of the new regulatory frameworks for PAGCOR-accredited Business-to-Business (B2B) Providers along with the implementation of the attached ***Transition Guidelines for the Existing Gaming System Administrators and Their Contracted Business-to-Business (B2B) Providers***.

The said guidelines shall be implemented within the transition period for all existing Gaming System Administrators and their contracted Gaming Affiliates (i.e., Game Aggregators or Game Content Providers) and Support Service Providers.

All Applications for accreditation as Gaming Affiliate and/or Support Service Provider with complete documentary requirements submitted to the EGLD before 31 December 2025 shall be granted an accreditation that is valid for its first three (3) years.

2. Implementation of the ***Regulatory Framework for the Accreditation of Gaming Affiliates and Support Service Providers Rev. No. 1***, which shall be applied prospectively, and shall provide for the following salient amended provisions, among others:

- a) The validity period for accreditation along with the Application Fee or Renewal

Fee shall be increased from one year to two (2) years.

- b) The required Performance Cash Deposit (PCD) for posting by the GCP to PAGCOR shall be reduced to One Million Pesos (PhP1Million), regardless of the number of Game Offerings.
  - c) The conduct of probity checking shall be in accordance with the provisions of the Probity Checking Framework issued by the PAGCOR Anti-Money Laundering Supervision and Enforcement Department (PASED), and to be implemented by Investigation and Verification Department (IVD).
  - d) A foreign-based Game Aggregator or GCP may appoint a local entity or a GSA as exclusive distributor of its products and/or services.
  - e) All accredited B2B providers shall offer their products and/or services only to PAGCOR-accredited GSAs.
  - f) All B2B providers contracted by the GSAs or Licensees to provide gaming products and/or services must be accredited by PAGCOR.
3. Implementation of the ***Regulatory Framework for the Accreditation of Gaming System Administrators Rev. No. 0***, which shall be applied prospectively, and shall include the following salient provisions:
- a) The Gaming System Administrator (GSA) are required to avail of the products or services only from the PAGCOR-accredited B2B providers.
  - b) Forfeiture of the Performance Cash Deposit (PCD) may be imposed, whenever the accreditation of a GSA is revoked and cancelled, if the violation/circumstance so warrants.
  - c) Inclusion of the conduct of probity checking in accordance with the Probity Checking Framework issued by PASED.
  - d) Adoption of the Implementing Rules and Guidelines (IRG) for “*No Subleasing, Subletting and/or Sublicensing Policy*” along with the streamlining of gaming brands.
  - e) Inclusion of Responsible Gaming features in the electronic gaming system (EGS) such as enabling the Player to set his/her betting limits daily, weekly and/or monthly.
  - f) Integration of PAGCOR’s National Database for Restricted Persons (NDRP) to the EGS of the GSA through the Application Programming Interface (API) of PAGCOR.
  - g) Requirement on providing a link to the websites of the PAGCOR-recognized Help Centers in relation to Problem Gambling.

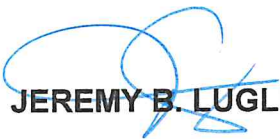
- h) Inclusion of the Guidelines and Procedures on Marketing and/or Promoting Online Gaming Platforms and Services.

Correspondingly, copy of the following regulatory frameworks may be viewed or downloaded through <https://www.pagcor.ph/regulatory/cegs.php>:

1. Regulatory Framework for the Accreditation of Gaming Affiliates and Support Service Revision No. 1; and
2. Regulatory Framework for the Accreditation of Gaming System Administrators Revision No. 0.

For your information and guidance.

Thank you.

  
**JEREMY B. LUGLUG**

cc: OCCEO  
VP, IGLRG  
VP, MEG  
A/AVP, CMED-EG

**TRANSITION GUIDELINES FOR THE EXISTING GAMING SYSTEM  
ADMINISTRATORS AND THEIR CONTRACTED  
BUSINESS-TO-BUSINESS (B2B) PROVIDERS**

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On 24 April 2025, the PAGCOR's Board of Directors approved the implementation of ***Regulatory Framework for the Accreditation of Gaming Affiliates and Support Service Providers Rev. No. 0***, for the processing of applications for accreditation of the following business-to-business (B2B) services and/or products:

- I. Gaming Affiliates
  1. Game Aggregator
  2. Game Content Provider
- II. Support Service Providers
  1. Payment Gateway Solution / Payment Channel
  2. Marketing / Promotional Service
  3. Customer Service
  4. Know-Your-Customer / Membership System
  5. Independent Game Testing Laboratory

To fully and effectively implement the new regulatory framework, the following Transition Guidelines shall likewise be implemented:

**1. Transition Period for Implementation of the New Regulatory Framework**

In order for the existing B2B providers that are contracted by PAGCOR-accredited Gaming System Administrators (GSA) to comply with the above Regulatory Framework and avoid disruption of their respective services/operations, a transition period until **31 March 2026** shall be imposed.

**2. Existing Gaming System Administrators and Their Contracted Gaming Affiliates and Support Service Providers**

**a. Gaming System Administrators (GSA), formerly Gaming System Service Providers (GSSP)**

- i. All existing GSAs shall declare and seek confirmation of approval to continuous operation of their contracted B2B providers by notifying the EGLD of the current list of their existing Gaming Affiliates and Support Service Providers, that are required to apply for accreditation with PAGCOR within the transition period or **until 31 March 2026**. Failure to do so shall render their corresponding gaming systems, gaming platforms, games, gaming equipment/paraphernalia and services to be non-compliant and unauthorized, which are consequently ordered to cease operation or stop implementation.

- ii. All existing GSAs shall submit the current list of previously approved games or sports/markets (for sports betting), as provided by its contracted GCPs including the DCSPs. The list shall indicate the game name, game version, game type on a per game offering basis for each GCP.
- iii. Each approved game/sports/market for implementation shall comply with the prescribed Return-to-Player (RTP) percentage range and allowed minimum bet per game offering/type.

**b. Game Content Providers (GCP) including the Data/Content Streaming Providers (DCSP)**

- i. The existing PAGCOR-accredited Data/Content Streaming Providers (DCSP) are classified under the Game Content Provider (GCP), that specifically provide live streamed games.
- ii. The Certificates of Accreditation issued to the concerned DCSPs (to be converted to GCPs) shall indicate the applicable validity period from date of approval of accreditation based on the amount of the Accreditation/Processing Fee paid, still subject to application renewal guidelines.
- iii. All previously approved and accredited DCSPs shall comply with the posting of the Performance Cash Deposit (PCD), not later than 31 March 2026, amounting to Php1Million.

**c. Reseller of Foreign-based DCSP (under GCP)**

- i. A "Reseller" of foreign-based DCSP (a GCP of live streamed games) may continue to act as distributor of the DCSP's games from abroad. However, the said DCSP, or its reseller/local representative, is required to apply for accreditation as GCP with PAGCOR on or before 31 March 2026. Failure to do so shall render the existing DCSP's live streamed games to be non-compliant and unauthorized, which are consequently ordered to cease operation.
- ii. Each foreign-based DCSP, or its reseller/local representative, shall be required to put-up a live dealer gaming studio or branch office located within the Philippines, and shall apply for a corresponding Permit to Hold (PTH) gaming equipment and paraphernalia, as applicable.

**d. GSA-contracted Support Service Providers**

- i. All existing Support Service Providers (SSP) currently contracted by a PAGCOR-accredited GSAs are required to apply for accreditation with PAGCOR on or before 31 March 2026. Failure to do so shall render the SSP's system/services to be non-compliant and unauthorized, which are consequently ordered to cease operation or stop implementation.

- ii. Unauthorized operation or implementation of SSP's system/service by the GSA may lead to imposition of penalty/fine as prescribed in Regulatory Framework for Offenses and Penalties (Remote Gaming Operations).

3. Incentive for Applicants as B2B Providers

- i. All Applications for accreditation as Gaming Affiliate and Support Service Provider with complete documentary requirements submitted to the EGLD before 31 December 2025 shall be granted an accreditation that is valid for its first three (3) years.