

Gibraltar

Jurisdiction code: GI | Tier: Tier 1 | Posture: Credible | Direction: Tightening

Live page: <https://advennt.io/jurisdictions/gibraltar/>

Overall status: Amber

Data current to 2026-10-25. Free jurisdiction — this report is available to everyone on advennt.io.

Expert review: Ramparts (law firm), Peter Pink-Howitt. Reviewed 26 Sep 2026.

Expert-reviewed wording is shown in place of the text it replaced. Each section's review history, including earlier wording, is on the live page.

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OVERVIEW

Executive Summary

Strong first-tier hub with low tax, but rising substance/compliance cost and no EU passport — enter with genuine local presence and clear UK/EU market strategy.

Recommendation	Conditional
Time to revenue	3 6 months
Capital requirement	Medium
Regulatory posture	Credible

Confidence	Probable
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Top risks

- GOSS/B2B perimeter capture
- substance-requirement non-compliance
- loss of EU market access

Top opportunities

- 0.15% gaming duty
- credible globally-respected licence

Analyst assessment

Entry by Product

Gibraltar's gambling market remains organised around the Gambling Act 2025, and the per-product position for an operator weighing entry has not shifted in terms of which verticals are open: licensed betting, gaming and lottery activity continues to be available through the Act's Part 4 licensing structure. What has changed is who must hold a licence to participate in supplying those verticals. The Act's Schedule 8 gave businesses newly brought within the licensing perimeter by the 2025 Act, including B2B suppliers, contracted-out service providers, marketing affiliates and persons controlling more than 25 percent of a licensed company, a six-month transitional window from the 1 April 2026 commencement date. That window closed on or about 1 October 2026. A business in one of those categories that had not filed a full and complete application by that point no longer benefits from transitional protection and must now hold a substantive licence to continue operating lawfully in that capacity. Existing holders of 2005 Act licences are unaffected: they are automatically grandfathered under Schedule 8 and face no equivalent filing deadline.

Separately from the gambling licensing perimeter, the Prediction Market Regulations 2026 establish a distinct non-gambling authorisation track. Prediction market activity conducted in accordance with those Regulations is not treated as betting, gaming or a lottery for the purposes of the Gambling Act 2025, which means an operator entering that specific vertical does so under a different authorisation regime entirely, with its own fee framework under enabling powers in sections 155 and 175 of the Act. For an operator mapping entry routes, the betting, gaming and lottery verticals sit under the main Part 4 licence; the prediction market vertical sits outside that licence altogether, under its own regulations.

Regulatory Picture

The Gambling Act 2025 is the governing statute, commenced from 1 April 2026, and it now defines a licensing perimeter that extends well beyond the operator of record to include the supply chain around that operator. The Schedule 8 transitional mechanism was the bridge between the old and new perimeters: it let newly-caught categories of business keep trading on a transitional basis while they prepared a full application, but that bridge has now closed for anyone who did not use it. B2B suppliers, contracted-out service providers, marketing affiliates, and controllers holding more than a 25 percent stake in a licensed company are the categories named in the Act as newly brought within scope, and each of those now needs to demonstrate a completed application on file to continue lawfully. The practical effect is to widen, materially, the population of businesses

answerable directly to the Gambling Commissioner rather than only to the operator they supply or control.

The Prediction Market Regulations 2026 continue to operate as a separate pathway. Their defining feature for entry purposes is the express statutory statement that activity conducted under them is not gambling at all under the 2025 Act's terms, which removes any question of dual licensing for an operator who structures its product correctly under that framework. The fiscal and licensing fee structure for that vertical sits in its own subsidiary legislation, made under the Act's general enabling powers rather than under the main Part 4 licence conditions.

Cost & Compliance

No new cost-to-operate development was identified, so the operative cost picture for a Part 4 licensee is the one already carried forward from the 1 April 2026 commencement. The one compliance-relevant change is not a cost figure but a compliance population change: the Schedule 8 deadline closing means a wider set of businesses, particularly those supplying services into licensed operators or holding significant equity stakes, now carry the ongoing compliance burden of holding and maintaining a licence in their own right, rather than relying on an operator's licence to cover their activity indirectly.

Enforcement & Risk

The Gambling Act 2025's Part 8 gives the Commissioner an administrative sanctions toolkit that has remained in force unchanged since the 1 April 2026 commencement: administrative penalties recoverable as a civil debt, public statements, cease-and-desist orders and prohibition orders, with a right of appeal to the Gambling Appeals Tribunal. No domestic enforcement notice from the Gibraltar Gambling Commissioner dated within the most recent research window was located, and that absence is treated as a research gap rather than evidence of no activity, since no primary enforcement log was available to confirm the position either way.

The clearer enforcement signal sits outside Gibraltar's own regulator. The UK Gambling Commission announced regulatory settlements between August and October 2026 against Gibraltar-incorporated operators, including QuinnBet (Gibraltar) Limited, and against three land-based casino operators. These operators hold GB point-of-consumption licences, which means their exposure runs through the UK Gambling Commission's extraterritorial licensing authority over Gibraltar-domiciled businesses that serve British customers, independent of Gibraltar's own Part 8 toolkit. For an operator structuring a Gibraltar entity to serve the UK market, this is the standing reminder that incorporation in Gibraltar does not place activity outside the reach of the UK regulator where the customer base is UK-facing.

The risk most directly tied to the Schedule 8 development is the revocation-adjacent risk sitting with newly-caught businesses that missed the 1 October 2026 filing point: continuing to operate a supply, affiliate or controlling role without the now-required licence removes the transitional cover the Act gave them and exposes that activity to the Part 8 toolkit described above, though the specific penalty provision attaching to a missed Schedule 8 deadline was not pinned to a named provision.

Outlook

The immediate item to watch is confirmation of how the Commissioner treats businesses that did not file by the Schedule 8 deadline, since that practical enforcement posture was

not located and would materially affect risk assessment for any newly-caught supplier or affiliate still regularising its position. A second item is the codes of practice the Commissioner has been issuing progressively since the 1 April 2026 commencement, which were not individually traced but would bear directly on operational compliance detail for any Part 4 licensee. For an operator considering the prediction market vertical specifically, the position is stable and carries no open question: the classification carve-out and the stablecoin/digital-asset payment permission under the Prediction Market Regulations 2026 both remain in force as established.

Expert-reviewed text · 2026-09-26

Market Entry Verdict. Gibraltar remains open to appropriately licensed gambling businesses but is in an active implementation phase following the wholesale replacement of its gambling statute. The posture is amber: not because licensing and supervision have only now been separated, but because operators must apply a substantially revised activity-based licence framework, a wider express enforcement toolkit, new GOSS licensing and a separate prediction-market authorisation regime, while Part 5 remains uncommenced.

Regulatory Picture. The Gambling Act 2025 received assent on 23 March 2026 and generally came into operation on 1 April 2026 under LN.2026/064, except sections 55–77; the Gambling (Amendment) Act 2026 came into operation the same day. The Licensing Authority and Gambling Commissioner both existed under the 2005 Act. The 2025 Act replaces the licence architecture, sharpens the allocation of functions and puts the Gambling Division on an express statutory footing.

Prediction Markets. The Prediction Market Regulations 2026, LN.2026/176, came into operation on 13 July 2026 and establish a separate authorisation regime with contract approval, a power for the Authority to prohibit or restrict classes of contract by direction, and participant-protection, safeguarding and market-integrity requirements. The requirement for authorisation is subject to exceptions for qualifying Part 4 licence holders and for qualifying Financial Services Act 2019 permission holders dealing in financial instruments. An authorisation is not a Part 4 licence and does not itself authorise any other regulated activity. Authorised operators may use digital-asset payments, including stablecoins, for funding, collateral, settlement, payments and withdrawals. The separate Prediction Market (Fees and Duties) Regulations 2026, LN.2026/316, came into operation on 13 August 2026. Two operators are entered on the Gambling Division's register of authorised prediction-market operators.

Cost and Compliance. For UK-facing remote-gaming business, the principal external tax change is the increase in UK Remote Gaming Duty from 21% to 40% from 1 April 2026. This is a UK tax on remote gaming with UK persons and does not change Gibraltar's domestic duty rates.

Enforcement Risk. Part 8 of the 2025 Act provides administrative penalties, public statements, cease-and-desist orders, temporary suspension orders and prohibition orders, and section 124 provides for regulatory settlement agreements. On 29 April 2026 the Gambling Division published a £100,000 regulatory settlement with an unnamed Gibraltar-licensed B2C operator for sanctions-screening failures identified in a sector-wide thematic review, followed on 9 June 2026 by published learning points. Sanctions screening is an active supervisory priority.

Outlook. The immediate implementation points are the commencement of Part 5 and completion of the Schedule 8 transition. Existing 2005 Act licensees continue under deemed licences until replacements are issued, without reapplying. Persons already carrying on activities that only became licensable under the 2025 Act hold six months' transitional cover from 1 April 2026, ending at the end of 30 September 2026; that cover continues beyond that date only if a full and complete application has been submitted within the six months.

Board Briefing

Headline

Gibraltar's Gambling Act 2025 has restructured licensing into up to six licence categories (including a new standalone marketing affiliate/agency licence) and expanded Commissioner enforcement powers, but the dominant commercial pressure this cycle is external: the UK Remote Gaming Duty rise from 21% to 40% (1 April 2026) on Gibraltar-domiciled UK-facing operators.

What has changed

- Gambling Act 2025 (Act No. 2026-04) commenced 1 April 2026, replacing the 2005 Act; regulator role split retained (Minister as Licensing Authority; Gambling Commissioner as supervisory/AML regulator).
- Licence categories reclassified/expanded — pipeline intelligence now identifies up to six licence categories, including a standalone Marketing Affiliate/Agency Licence bringing affiliates and marketing agencies within the licensing perimeter for the first time; the Schedule 8 transitional licence for newly captured activities ends at the end of 30 September 2026.
- A statutory register of licence holders is now mandated.
- Commissioner's enforcement toolkit widened from a binary suspend/revoke power to administrative fines, cease-and-desist orders, inspections and suspensions, alongside a new Gambling Appeals Tribunal. The Tribunal's jurisdiction is not general: under section 141(2) it hears appeals only where a right of appeal is bestowed by the Act, section 143 excludes several decisions from appeal altogether — among them the refusal of an application for a licence under Part 4 — and a further appeal to the Supreme Court lies on a point of law only under section 144.
- New Duties and Licence Fees Regulations 2026 introduce a £10,000 per-licence-type application fee and a staged Change-of-Control fee of up to £30,000, layered on top of existing tiered annual licence fees (£50k–£200k B2C; from £85k B2B).
- UK Remote Gaming Duty rose from 21% to 40% (1 April 2026) — the dominant margin pressure on UK-facing operators domiciled in Gibraltar this cycle; this is a UK, not Gibraltar, tax.
- Diversification signalled via Gibraltar's first prediction-market operator licence (issued under the outgoing 2005 Act) and the Property (Digital Assets etc) Act 2026 (Act No. 2026-09, in force 23 March 2026) recognising crypto-assets as personal property.

What to do now

- Map current group activities (marketing, affiliate management, CRM, hosting, fund management) against the expanded licensing perimeter and apply for or regularise any newly captured licensing by 30 September 2026, the last day of the transitional period.

From 1 October 2026 the position depends on which applies: no application made (exposed to the general prohibition and enforcement; no published forbearance); application made in time (the transitional licence continues until the application is determined and, if granted, until the new licence takes effect); licence or exemption confirmed.

- Model UK Remote Gaming Duty at 40% into UK-facing revenue forecasts and stress-test margins for Gibraltar-domiciled operators with high UK-revenue concentration.
- Budget for the new £10,000 per-licence-type application fee and up to £30,000 staged Change-of-Control fee under the Duties and Licence Fees Regulations 2026, and seek T1 confirmation of how these interact with existing tiered annual fees.
- Track Commissioner guidance on GOSS/marketing-affiliate categorisation and Part 5 (personal management licence) commencement before finalising senior-management structures.

What to watch

- Separate commencement notice for Part 5 (Regulated Individuals / personal management licences).
- End of the Schedule 8 transitional period for newly captured activities at the end of 30 September 2026; from 1 October 2026 a provider without a licence, an exemption or an application made in time is exposed.
- Ratification of the Gibraltar-EU Treaty and the probable phased transaction tax (15%/16%/17%) however this will not impact gambling services as the tax is on goods only.
- Further UK fiscal measures affecting Remote Gaming Duty or the point-of-consumption tax base.
- Uptake and regulatory treatment of prediction-market and digital-asset products as diversification plays.

Product Coverage

Status for each product as published for this jurisdiction.

Expert reviewed: The expert returned this position.

Product / vertical	Status	How this answer was reached
Casino	Open	Expert reviewed
Poker	Open	Expert reviewed
Sports Betting	Open	Expert reviewed
Skill Games	Open	Expert reviewed
Lottery	Open	Expert reviewed
Software / B2B	Open	Expert reviewed
Bingo	Open	Expert reviewed
Other Event Betting	Open	Expert reviewed
Horse Racing	Open	Expert reviewed
Exchange Betting	Open	Expert reviewed
Pool Betting	Open	Expert reviewed
Virtual Events Betting	Open	Expert reviewed
Prediction Markets	Open	Expert reviewed
Free Play	Open	Expert reviewed
Affiliate Marketing	Open	Expert reviewed
Payments for Gambling	Open	Expert reviewed
Betting Agent	Open	Expert reviewed

Fantasy Sports	Open	Expert reviewed
eSports Betting	Open	Expert reviewed
Sweepstakes	Grey zone	Expert reviewed
Crypto Gambling	Grey zone	Expert reviewed

Product carve-outs (excluded from definition of gambling):

- Social Gambling: Gambling Act 2025 exclusion — Limited scope, applying only to certain land-based non-commercial settings.
- Free Prize Draws: Gambling Act 2025 exclusion — Free prize draws excluded from the definition of gambling.

Service provider risk

Provider type	Risk level	Traffic light
Payment Processor	Low	Green

Regulatory Pulse

Direction	Tightening
Conviction	Medium
Lead signal	Gambling Act 2025 Sch 8 transitional licence window closed ~1 Oct 2026, pulling B2B/affiliates into full licensing
Category	Licensing And Regulation

Section-by-section cycle summary

Concise per-section summaries from the latest interpret cycle. These findings are folded additively into the persistent-state and are reflected in the baseline narratives throughout this report.

Overview: The Gambling Act 2025 continues as GI's governing statute. This cycle's principal development is the closure of the Act's Schedule 8 six-month transitional licensing window on or about 1 October 2026, which pulled B2B suppliers, contracted-out service providers, marketing affiliates and controllers of over 25% of a licensed company into full licensing obligations.

Licensing & Regulation: Schedule 8 of the Gambling Act 2025 gave newly-caught businesses (B2B suppliers, contracted-out service providers, marketing affiliates and >25% controllers) a six-month transitional licence window from the 1 April 2026 commencement. That window closed on or about 1 October 2026, meaning such businesses must by now have filed a full application to retain trading rights; existing 2005 Act licence holders are automatically grandfathered.

Enforcement: No enforcement action by the Gibraltar Gambling Commissioner dated within this cycle's window was located. The Act's Part 8 administrative sanctions toolkit (civil-debt penalties, public statements, cease-and-desist and prohibition orders, and the Gambling Appeals Tribunal) remains in force as standing context from the 1 April 2026 commencement.

Technical Compliance: No new technical compliance development was located this cycle.

Distribution & Platform Rules: No new distribution or platform rule development was located this cycle.

Commercial Activity: No commercial transaction specific to the gambling sector in Gibraltar was identified this cycle.

Extraterritorial Reach: The UK Gambling Commission announced regulatory settlements between August and October 2026 against Gibraltar-incorporated operators including QuinnBet (Gibraltar) Limited, operating under GB point-of-consumption licences, and three land-based casino operators.

Market Opportunity: The Prediction Market Regulations 2026 establish a dedicated non-gambling authorisation regime, expressly permitting stablecoins and other digital assets for funding, collateral, settlement and withdrawals, creating a new adjacent market-entry vertical.

Entry Pathways: Businesses newly brought within the licensing perimeter by the Gambling Act 2025 faced a hard deadline of on or about 1 October 2026 to file a full and complete licence application under Schedule 8; failure to do so by that date removes the transitional protection.

Cost to Operate: No new cost-to-operate development was located this cycle.

Operational Obligations: No new operational obligation development was located this cycle.

AML / CFT Regime: No first-party AML/CFT development was identified for the gambling sector this cycle.

Player Protection: No new player protection development was located this cycle.

Payments & Money Flow: The Prediction Market Regulations 2026 expressly permit stablecoin and digital-asset use for funding, collateral, settlement and withdrawal, a payments channel distinct from the Gambling Act 2025's licensed activities.

Competitive Landscape: No new competitive landscape development was located this cycle.

Reform Horizon: No new reform-horizon items beyond the already-enacted Gambling Act 2025 and Prediction Market Regulations 2026 were located this cycle.

Executive Summary: The dominant development this cycle is the closure of the Gambling Act 2025's Schedule 8 transitional licence window on or about 1 October 2026, pulling B2B suppliers, contracted-out service providers, marketing affiliates and controllers into full licensing. UK Gambling Commission enforcement against Gibraltar-incorporated operators continued in the same period.

Regulated Activity Classes: The Prediction Market Regulations 2026 create a distinct non-gambling authorisation regime: prediction market activity conducted in accordance with those regulations is not treated as betting, gaming or a lottery under the Gambling Act 2025.

Consumer Protection: No new consumer protection development was located this cycle.

Key Judgments

Analyst key judgments from the 2026-10-25 interpret cycle.

- The Schedule 8 transitional licence window closing on or about 1 October 2026 materially expands the population of businesses subject to full Gambling Act 2025 licensing, particularly B2B suppliers, affiliates and payment-related service providers previously outside the perimeter.
- Continued UK Gambling Commission enforcement against Gibraltar-incorporated GB-licensed operators indicates extraterritorial regulatory exposure for Gibraltar-domiciled gambling businesses persists independent of GI's own domestic regime.

Latest Update

2026-04-01 • Licensing • Impact: High

Gambling Act 2025 (Act No. 2026-04) came into force, introducing B2C/B2B/GOSS licence categories, substance requirements and an empowered Commissioner.

2025-10-01 • Taxes • Impact: Medium

Gaming duty unified at 0.15% of GGY (replacing 1% turnover/GGY bases); annual fees raised to c.£100k B2C / £85k B2B.

Reform Horizon

Reform Horizon: Amber

The Property (Digital Assets etc) Act 2026, dated 23 March 2026 and passed in the same legislative session as the Gambling Act 2025, grants certain digital assets, including crypto-tokens, statutory personal-property status under Gibraltar law. This mirrors equivalent UK legislation that entered into force on 2 December 2025. The Act is a forward-looking structural development rather than a gambling-specific rule change, but it is relevant to blockchain-based prediction and gaming products, giving Gibraltar a statutory property-law basis for such products ahead of most comparator jurisdictions. Separately, the commencement notice for the regulated-individuals regime under the Gambling Act 2025 remains an open item on the reform horizon.

Reform stage	Enacted In Force
Confidence	Probable

Reform horizon scenario

The base scenario for Gibraltar over the coming cycle is orderly transition: the Schedule 8 transitional licence for newly captured activities ends at the end of 30 September 2026, new licence category applications are processed, and Part 5 personal management licensing commences via a separate notice. The regulatory framework stabilises under the 2025 Act with no further material legislative change. The adverse scenario is one of transitional disruption: Part 5 commencement arrives earlier than expected with a short implementation window, or the Commissioner begins enforcement action against unlicensed GOSS-category providers before the transitional window closes, creating compliance pressure across the B2B and affiliate ecosystem.

RISK ASSESSMENT

Enforcement

Status: Green

Gibraltar's enforcement landscape is being reshaped this cycle by the Gambling Act 2025's split of licensing from enforcement, effective 1 April 2026: the Commissioner and the new Gambling Division now hold the active supervisory and enforcement function, distinct from the Authority's licensing role. This is a durable, primary-legislation change, assessed Probable given convergent T3 secondary sourcing but no T1 Gambling Division primary confirmation this cycle. Separately, a GBP 100,000 regulatory settlement over sanctions-screening deficiencies at an unnamed Gibraltar-licensed B2C operator was reported as published 29 April 2026, but this claim is assessed only Uncertain: it rests solely on a T3 secondary compliance guide, and the Commissioner's own decision notice was not located this cycle. No other enforcement events surfaced. The gaps register also notes that the seed-injected regulator URL intended for the Gambling Division resolved instead to the UK Gambling Commission, structurally limiting this cycle's ability to reach Gibraltar's own primary enforcement sourcing. Enforcement risk should therefore be read as structurally rising (new architecture, new Division) while the one reported case-level outcome remains unconfirmed.

Expert-reviewed text · 2026-09-26

Part 5 of the Act (sections 55–77) provides for the regulation of individuals performing regulated functions. Those provisions have been enacted but not commenced, and are not yet operative.

Expert-reviewed text · 2026-09-26

Part 8 of the Gambling Act 2025 (sections 114–130) sets out common sanctioning powers: administrative penalties, public statements, cease-and-desist orders, temporary licence-suspension orders and prohibition orders. Under section 124 the Commissioner may instead enter a regulatory settlement agreement at any time before a decision notice is issued, and section 125 requires sanctions to be proportionate and published guidance on sanctioning to be issued. Part 9 separately provides special remedies, namely injunctions and restitution orders. These provisions expand and codify the Commissioner's express powers; the 2005 Act regime was not limited to suspension or revocation, and also provided for amendment of licence terms, investigations and codes of practice. Part 11 establishes the Gambling Appeals Tribunal: an appeal lies only where the Act confers a right of appeal, section 143 excludes specified decisions (including refusal of a Part 4 licence application), and section 144 allows a further appeal to the Supreme Court on a point of law. The Act does not fix one numerical ceiling for all administrative penalties; penalty regulations under section 157 must specify the amount of each penalty they create. Matters brought to the Commissioner's attention before 1 April 2026 continue to be dealt with, and any sanction determined, under the Gambling Act 2005 (Schedule 8, paragraph 6). The 29 April 2026 sanctions-screening settlement (£100,000) is the most recent published enforcement outcome.

Expert-reviewed text · 2026-09-26

The Gambling Act 2025, generally in operation from 1 April 2026, keeps the existing distinction between the Licensing Authority and the Gambling Commissioner, restates their functions and puts the Gambling Division on an express statutory footing. Part 8 of the Act gives the Commissioner a wider express sanctioning toolkit. On 29 April 2026 the Gambling Division published a regulatory settlement under which an unnamed Gibraltar-licensed B2C operator will pay £100,000 in lieu of any financial penalty, for failing to implement effective sanctions-screening systems and controls. The failure was identified in a sector-wide thematic review; the regulator confirmed that no substantive Sanctions Act breaches occurred in respect of individual customers, and the Gambling Division published guidance and learning points from the review on 9 June 2026.

Enforcement powers

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- —
- Administrative Fines
- Cease And Desist Suspension Prohibition

Enforcement events

- —: Commencement of the Gambling Act 2025 introduced new substance, reporting and approved-persons conditions across all licensees, activated the Commissioner's expanded enforcement toolkit (administrative fines, cease-and-desist, inspections, suspensions) and established the Gambling Appeals Tribunal, within a six-month transitional window. The Tribunal's jurisdiction is not general: under section 141(2) it hears appeals only where a right of appeal is bestowed by the Act, section 143 excludes several decisions from appeal altogether —

among them the refusal of an application for a licence under Part 4 — and a further appeal to the Supreme Court lies on a point of law only under section 144.

- —: Royal Assent given to the Gambling Act 2025 (Act No. 2026-04), the primary legislative event preceding commencement of the new licensing and enforcement framework.

Extraterritorial Reach

Status: Green

Sections 39 and 40 of the Gambling Act 2025 put a sufficient-substantive-presence test at the centre of licensing: the Authority must be satisfied under section 39(1)(b) that an applicant or licence holder has and will maintain a sufficient substantive presence in Gibraltar, and section 40 directs it to the nature and usage of remote gambling equipment here, the number and nature of jobs created and maintained, the tax revenue accruing to the Government, and such other factors as appear to it to constitute such a presence. Separately, section 30 deems a person to be carrying on a regulated activity in or from Gibraltar in three cases that would not otherwise qualify, including where the day-to-day management sits in an establishment here while the head office does not, and where remote-gambling facilities are provided to a licence holder from elsewhere, subject to the group, non-critical and content-software exclusions in section 30(6). This materially expands the jurisdictional reach test beyond a narrower technology-location standard: a business cannot avoid the Gibraltar licensing perimeter simply by hosting servers elsewhere if its substantive operational presence remains in Gibraltar. No further detail on how the test is applied in practice, or on any cross-border enforcement mechanism flowing from it, was evidenced this cycle.

Expert-reviewed text · 2026-09-26

Section 19 of the Gambling Act 2025 sets out when remote gambling is carried on in or from Gibraltar, including where any remote gambling equipment is situated in Gibraltar or the business is organised, operated or managed from Gibraltar. Section 30 deems a person to be carrying on a regulated activity in or from Gibraltar in three further cases, subject to the group, non-critical and content-software exclusions in section 30(6). Section 174 deems regulated activities and services provided in connection with gambling business carried on or conducted on a computer server located in Gibraltar to be carried on or provided in Gibraltar. Separately, sections 39 and 40 require the Authority to be satisfied that an applicant or licence holder has and will maintain a sufficient substantive presence in Gibraltar, having regard to matters including remote gambling equipment, Gibraltar employment and tax revenue. Marketing services are licensable wherever in the world the marketed gambling takes place (section 17(1)(f)(i)). The perimeter therefore turns on the statutory connecting factors applied to the facts, not on server location alone.

Reform Horizon

Status: Amber

The Property (Digital Assets etc) Act 2026, dated 23 March 2026 and passed in the same legislative session as the Gambling Act 2025, grants certain digital assets, including crypto-tokens, statutory personal-property status under Gibraltar law. This mirrors equivalent UK legislation that entered into force on 2 December 2025. The Act is a forward-looking structural development rather than a gambling-specific rule change, but it is relevant to blockchain-based prediction and gaming products, giving Gibraltar a statutory property-law basis for such products ahead of most comparator jurisdictions.

Separately, the commencement notice for the regulated-individuals regime under the Gambling Act 2025 remains an open item on the reform horizon.

Expert-reviewed text · 2026-09-26

The immediate reform and implementation issues are the future commencement of Part 5 (sections 55–77), completion of the Schedule 8 transition, and the application of the revised lottery and money's-worth definitions introduced by the Gambling (Amendment) Act 2026. The Prediction Market Regulations 2026 are in force from 13 July 2026, and the related fees-and-duty regulations from 13 August 2026; the Authority may prohibit or restrict classes of prediction-market contract by direction. The Gambling Bill 2025 had included, within the definition of gambling, casino-type games combining free and paid participation; that limb was not enacted. Its omission is relevant to sweepstakes-style and free-to-play casino products, whose classification must follow the enacted definitions, but it does not create a special crypto or prediction-market boundary: prediction-market activity is a distinct activity and is not treated as betting, gaming or a lottery solely because of its prediction-market characteristics.

Expert-reviewed text · 2026-09-26

Part 5 (sections 55–77) is enacted but not commenced. Licence fees, including GOSS tariffs, are set by LN.2026/065, non-remote fees by LN.2026/088, and prediction-market fees and duty by LN.2026/316, so none is an open question. Two operators are entered on the Gambling Division's register of authorised prediction-market operators: Predict Street Limited (PMA01) and Wire Alternative Markets Limited (PMA02). The next material implementation steps are any notice commencing Part 5, the issue of new licences under Schedule 8, paragraph 2, and decisions on applications by persons relying on transitional cover under Schedule 8, paragraphs 4 and 5.

Expert-reviewed text · 2026-09-26

Under Schedule 8, paragraph 2, a person licensed under the 2005 Act immediately before commencement is treated as holding the corresponding licence under the 2025 Act until the Authority issues a new licence, and need not apply for it; that continuation has no fixed expiry. Paragraphs 4 and 5 apply only to a person who was already carrying on by way of business an activity that requires a licence under the 2025 Act but did not under the 2005 Act. That person's transitional licence is valid for an initial period of six months from commencement on 1 April 2026, ending at the end of 30 September 2026. If a full and complete application is submitted within that period, the transitional licence continues until the licence is given, or the application is refused and written notice sent. Anyone relying on paragraphs 4 and 5 who has not yet filed should do so no later than 30 September 2026.

Outlook

Status: Green

The outlook is positive-to-stable on Gibraltar's own regulatory settings but increasingly shaped by external tax pressure: the 2025 Act modernises the licensing and enforcement framework and repositions Gibraltar as a top-tier hub following its removal from the European Commission's high-risk list, while the pending Gibraltar-EU Treaty (Schengen access) could reshape labour and market-access economics via a probable phased transaction tax (15%/16%/17%) however this will not impact gambling services as the tax is on goods only. The dominant commercial driver this cycle, however, is external: the UK Remote Gaming Duty rose from 21% to 40% with effect from 1 April 2026, materially

compressing margins for the many Gibraltar-domiciled operators with high UK-revenue dependency (reportedly ~75% for some incumbents), and is a more immediate threat than the 2025 Act itself. Gibraltar's response includes visible diversification signals — the jurisdiction's first prediction-market operator licence (issued under the outgoing 2005 Act, operator not named on current sourcing) and the Property (Digital Assets etc) Act 2026 (Act No. 2026-09, in force 23 March 2026) recognising crypto-assets as personal property — pointing to a deliberate strategic pivot toward non-UK, product-diversified revenue. Compliance costs are rising (new tiered annual fees, a £10,000 per-licence-type application fee and a staged Change-of-Control fee of up to £30,000 under the Duties and Licence Fees Regulations 2026) and the GOSS/marketing-affiliate perimeter remains partly unclear pending Commissioner guidance and the awaited Part 5 (personal management licence) commencement.

Red Flags

[GI-RF-005] High UK-revenue concentration among Gibraltar-domiciled operators

UK Remote Gaming Duty rose from 21% to 40% (1 April 2026); operators with high UK-revenue dependency face material margin compression independent of Gibraltar's own tax settings.

Evidence: [SRC-GI-014](#)

[GI-RF-001] Operating support services (marketing, CRM, hosting, fund management) in/from Gibraltar without the relevant GOSS or Marketing Affiliate/Agency licence

The 2025 Act's expanded perimeter now captures marketing affiliates and agencies directly; non-compliant firms risk enforcement once the six-month transition window closes.

Evidence: [SRC-GI-005](#), [SRC-GI-013](#)

[GI-RF-002] Brass-plate Gibraltar entity with minimal local staff/office presence

Schedule 2 substance requirements can lead to licence refusal or revocation under the 2025 Act.

Evidence: [SRC-GI-012](#)

[GI-RF-004] B2B supply into a Gibraltar-licensed operator from abroad without a Gibraltar licence

§30 extends the licensing perimeter to any-location supply into Gibraltar-licensed operators.

Evidence: [SRC-GI-012](#)

[GI-RF-003] VAT-saving Gibraltar marketing subsidiary with minimal presence

Likely to be refused a Marketing Affiliate/Agency licence under the new standalone marketing licensing category.

Evidence: [SRC-GI-012](#)

[GI-RF-006] Application and change-of-control fee exposure under the Gambling (Duties and Licence Fees) Regulations 2026: application fees run to £30,000 for a new B2C betting or gaming licence (Schedule 2), and a change-of-control notice

carries a £3,000 base fee rising to a maximum of £30,000 on the Licensing Authority's complexity assessment (Schedule 4)

Application fees are non-refundable and payable on submission, and the change-of-control balance must be paid before the notice is treated as complete — so both land as unbudgeted cash exposure on entry and on any restructuring or M&A. Earlier commentary reported a flat £10,000 per licence type; Schedule 2 sets no such flat fee, and £10,000 is only the B2B direct-integration line, so a B2C applicant budgeting from that figure is short by £20,000.

Evidence: [SRC-GI-013](#)

[GI-RF-007] Part 5 (regulated functions and regulated individuals) is the only Part of the Gambling Act 2025 left uncommenced — LN.2026/064 brought the Act into force on 1 April 2026 "All except - ss.55- 77", and Part 5 is exactly ss.55-77

Key function holders perform regulated functions with no commenced statutory personal-licensing framework, while LN.2026/065 (in force 1 April 2026) already sets application fees for Regulated Individuals at regulation 9 — the fee machinery for approvals is live before the approval regime it serves. Licence holders cannot obtain Commissioner approval under ss.64-74 and must manage significant-influence appointments on undertakings rather than statutory approval until a further commencement notice is made.

Evidence: [SRC-GI-001](#), [SRC-GI-013](#)

[GI-RF-008] Sweepstakes and social-casino platforms remain outside Gibraltar's licensing perimeter

Growing competitive-distortion risk for licensed incumbents now facing higher fees, AML obligations and 40% UK duty exposure, while unlicensed adjacent products face no equivalent cost base.

Evidence: [SRC-GI-006](#)

Controls & Mitigations

Recommended controls derived from red flags and architecture patterns.

Control	Description	Linked patterns
GOSS perimeter mapping	Map marketing/CRM/hosting/fund functions against GOSS scope and license accordingly.	GI-AP-003
Substance demonstration	Maintain staff, office, infrastructure and local tax contribution per Schedule 2.	GI-AP-004
Dual-regulation compliance	Maintain UKGC compliance for UK-facing books and local EU licences for EU markets.	GI-AP-005
AML/CFT programme (POCA 2015)	Maintain AML/CFT controls under the Commissioner's supervisory role.	GI-AP-001
Product testing / certification	Obtain approved test-house certification pre-launch.	GI-AP-001

Liability Exposure

Counterparty	Liability head	Sources
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B2B Supplier	unlicensed supply into GI-licensed operator (§30)	SRC-GI-012
Marketing Affiliate	unlicensed support services (GOSS)	SRC-GI-005

Architecture Patterns

[GI-AP-001] B2B/B2C hub-licensing model

Typology: Regulatory Export Hub

Liability heads: Unlicensed Operation, Supply Without Licence

[GI-AP-002] Activity-based licensing perimeter (post-2025 Act)

Typology: Perimeter Expansion

Liability heads: Unlicensed Support Services

[GI-AP-003] GOSS support-services capture (marketing/CRM/hosting/funds)

Typology: Supply Chain Oversight

Liability heads: Unlicensed Marketing, Unlicensed Fund Management

[GI-AP-004] Substance / anti-brass-plate regime

Typology: Economic Substance

Liability heads: Insufficient Presence

[GI-AP-005] Post-Brexit UKGC white-list alignment (no EU passport)

Typology: Cross Border Access

Liability heads: Dual Regulation Breach

[GI-AP-006] Dual-body Licensing Authority / Commissioner split

Typology: Institutional Separation

Liability heads: Licence Condition Breach

Worked Examples

UK-facing sportsbook seeking GI base

Entities: B2C operator

Needs B2C licence, substance, UKGC dual regulation, 0.15% GI duty plus UK POC tax.

Recommendation: Apply for B2C licence; build local team; confirm UKGC alignment.

Games studio supplying GI-licensed casinos from Malta

Entities: B2B supplier

§30 requires a GI licence even for abroad-based supply into GI licensees.

Recommendation: Obtain B2B licence or operate sheltered under a licensed operator.

Group marketing hub in Gibraltar

Entities: GOSS provider

Marketing in/from Gibraltar requires GOSS licence unless intra-group from a licensed entity; minimal-presence VAT-saving hubs likely refused.

Recommendation: Assess intra-group exemption; otherwise license and add substance.

Operator targeting EU consumers from GI

Entities: B2C operator

No EU passporting post-Brexit; local EU licences required.

Recommendation: Obtain host-state EU licences; do not rely on GI licence for EU access.

Senior manager appointment pending Part 5

Entities: Approved person

Part 5 personal management licence regime not yet commenced; monitor for separate notice.

Recommendation: Prepare approved-persons documentation; track Part 5 commencement.

Decision Tree

Q: Are you conducting or facilitating gambling in or from Gibraltar?

Q: Is the activity B2C operator-facing?

Q: Can you meet substance + fit-and-proper + product-testing requirements?

Q: Is the activity B2B supply or a support service (marketing/CRM/hosting/funds)?

Q: Apply for B2C Gambling Operator's Licence within transition window?

Q: Do you supply into a GI-licensed operator (incl. from abroad, §30)?

Q: Are your AML (POCA 2015) and reporting controls in place?

Q: Do you target UK customers requiring dual UKGC regulation?

Q: Do you target EU customers requiring local EU licences (no passport)?

LEGAL BASIS

Overview

Status: Green

Gibraltar's gambling sector is governed by the Gambling Act 2025, which came into operation on 1 April 2026 and replaced the Gambling Act 2005 as the controlling statute for new applications. The Act widened the licensing perimeter beyond operators themselves to capture B2B suppliers, contracted-out service providers, marketing affiliates and controllers holding more than 25 percent of a licensed company, with a six-month transitional filing window under Schedule 8 that closed on or about 1 October 2026. Existing 2005 Act licence holders continue under automatic grandfathering. Alongside the main gambling perimeter, the Prediction Market Regulations 2026 create a separate, non-gambling authorisation track for prediction market activity, with its own fee structure. Gibraltar-incorporated operators remain separately exposed to UK Gambling Commission oversight where they hold GB point-of-consumption licences, as illustrated by regulatory settlements announced between August and October 2026.

Expert-reviewed text · 2026-09-26

Gibraltar has replaced its gambling law. The Gambling Act 2025 received assent on 23 March 2026 and generally came into operation on 1 April 2026 under LN.2026/064, except sections 55–77. It repealed the Gambling Act 2005, introduced an activity-based licence framework, brought marketing, relevant-company ownership and customer-funds activity into licensing as Gambling Operator Support Services, and expanded the Commissioner's express enforcement powers. It did not create the distinction between the Licensing Authority and the Gambling Commissioner, which already existed under the 2005 Act. The Gambling (Amendment) Act 2026, in operation from 1 April 2026, revised the definitions of "lottery", "money prize" and "money's worth" and inserted the power to prescribe gaming taxes and duties.

The Prediction Market Regulations 2026, LN.2026/176, came into operation on 13 July 2026 and establish a separate prediction-market authorisation regime that permits the use of digital-asset payments, including stablecoins. The fees-and-duty regulations, LN.2026/316, came into operation on 13 August 2026. The Property (Digital Assets etc) Act 2026, in operation from 23 March 2026, clarifies general property law for digital or electronic things but does not determine their gambling classification. Part 5 (regulated individuals) remains uncommenced.

Licensing & Regulation

Status: Green

The Gambling Act 2025, in force from 1 April 2026, governs licensing in Gibraltar and is administered by the Gambling Commissioner. Schedule 8 of the Act gave businesses newly captured by the widened licensing perimeter, specifically B2B suppliers, contracted-out service providers, marketing affiliates and persons controlling more than 25 percent of a licensed company, a six-month transitional licence window running from the 1 April 2026 commencement. That window closed on or about 1 October 2026: a business in one of those categories had to file a full and complete application by that point to retain trading rights, and failure to do so removes the transitional protection Schedule 8 provided. Businesses that already held a licence under the 2005 Act are automatically grandfathered under Schedule 8 and are not subject to this filing deadline. The practical effect of the window closing is a materially wider population of businesses now holding, or needing to hold, a direct licence from the Commissioner rather than operating under cover of an operator's licence.

Expert-reviewed text · 2026-09-26

The Gambling Act 2025, generally in operation from 1 April 2026, replaced the former licence categories with an activity-based framework covering B2C, B2B and GOSS activities. Licensing decisions remain with the Licensing Authority (section 5), and supervision and enforcement with the Gambling Commissioner (section 7), supported by the Gambling Division (section 10(3)). What changed is the scope and statutory detail of the framework, not the creation of an institutional separation that did not previously exist.

The Gambling (Amendment) Act 2026 (Act 2026-12) was passed on 31 March 2026 and came into operation on publication on 1 April 2026. It deleted the defined term "free prize draw", substituted the definition of "lottery", inserted a definition of "money prize", widened "money's worth" to include financial instruments and securities of any kind (excluding other chattels and real property), and inserted section 175, under which licence holders pay the gaming taxes and duties prescribed by the Minister. It gave effect to amendments omitted at Committee Stage of the Gambling Bill 2025.

Expert-reviewed text · 2026-09-21

A person licensed under the 2005 Act immediately before commencement is treated under Schedule 8, paragraph 2 as holding a licence granted under the 2025 Act until the Authority issues a replacement, and is not required to apply for it; there is no fixed six-month expiry on that continuation. The six-month transitional licence under Schedule 8, paragraphs 4 and 5 applies only to activities that require a licence under the 2025 Act but did not under the 2005 Act, and it remains valid beyond six months where a complete application is filed within the window.

Licence types

- B2C Gambling Operator'S Licence: Gambling Act 2025 (Gibraltar)
- B2B Gambling Operator'S Licence: Gambling Act 2025 (Gibraltar) \$19, \$30
- Gambling Operator Support Services (Goss) Licence: Gambling Act 2025 (Gibraltar) \$17(1)(f)
- Marketing Affiliate/Agency Licence: Gambling Act 2025 (Gibraltar) / Duties and Licence Fees Regulations 2026

Product coverage

Product	Status
Casino	Open
Poker	Open
Betting	Open
Skill Games	Open
Lottery	Open
Software B2B	Open
Bingo	Open
Fantasy Sports	Open
Esports Betting	Open
Sweepstakes	Grey Zone
Crypto Gambling	Grey Zone
Affiliate Marketing	Open
Payments For Gambling	Open
Betting Agent	Open

Technical Compliance

Status: Green

Operators must use tested systems and approved test-house certifications; even cloud-hosted operators need robust, tested controls. Geolocation/age-verification (PASS scheme) and product testing form part of licensing. The 2025 Act's technical-standards and digitised-reporting requirements (AML, financial disclosures, safer gambling) are being phased in.

Distribution & Platform Rules

Status: Amber

The Gambling Act 2025 introduces a new GOSS licence category covering owners and marketing activity, sitting alongside the existing B2C and B2B categories. This is a direct expansion of the distribution and platform-rules perimeter: businesses whose role is ownership or marketing of gambling products, rather than direct operation, now fall within a dedicated licensing category rather than being addressed indirectly through operator-facing licences. GOSS fees are set by LN.2026/065, with application fees in Schedule 2 and annual fees in Schedule 3. No further detail on GOSS-specific conditions or marketing-restriction mechanics was evidenced this cycle.

Expert-reviewed text • 2026-09-21

GOSS fees are set by the Gambling (Duties and Licence Fees) Regulations 2026 (LN.2026/065), in force 1 April 2026, with application fees in Schedule 2 and annual fees in Schedule 3; conditions and marketing-restriction mechanics remain unevidenced this cycle.

AML / CFT Regime

Status: Green

Gibraltar applies a UK-aligned AML/CFT framework grounded in the Proceeds of Crime Act 2015, a durable primary statute. The Gambling Commissioner is confirmed as the AML/CFT regulator for the gambling sector, with the Gibraltar Financial Intelligence Unit serving as the designated financial intelligence unit. The framework reflects close alignment with UK AML/CFT standards, including customer due diligence, enhanced due diligence for higher-risk relationships, and suspicious transaction reporting obligations. The practical burden of AML/CFT compliance is assessed as moderate, reflecting a mature framework with substantive reporting obligations that are well-understood by operators already familiar with UK or MGA-equivalent standards, but without prohibitive structural barriers to compliance. No FATF grey or black list designation applies to Gibraltar as a structural matter. The Gambling Commissioner exercises AML/CFT supervisory powers alongside its gambling regulatory functions, meaning AML/CFT compliance is integrated into the broader licence-condition framework rather than administered by a separate financial regulator. Operators entering Gibraltar should budget for a dedicated AML/CFT compliance function and should treat the Commissioner as an active AML/CFT supervisor, not merely a licensing body.

Player Protection

Status: Green

No new player protection requirements were evidenced this cycle. The Gibraltar Gambling Act 2025 does not materially alter responsible gambling obligations relative to the prior framework. Gibraltar retains close alignment with UKGC standards via a longstanding memorandum of understanding, and the player protection practical burden is assessed as moderate, reflecting substantive self-exclusion and responsible gambling obligations without prohibitive cost barriers. The GOSS licensing category now captures marketing and advertising services, meaning that the marketing perimeter is subject to licensing oversight, though no new content restrictions or advertising bans were evidenced this cycle. Operators should expect player protection obligations consistent with a UKGC-aligned framework, including self-exclusion mechanisms and responsible gambling tools, and should treat the moderate practical burden assessment as reflecting a well-established compliance environment rather than a light-touch regime.

Operational Obligations

Status: Green

New operational obligations attach to Gibraltar licensees on relicensing under the Gambling Act 2025, principally the Sufficient Substantive Presence conditions under sections 31 to 54 and Schedule 2, which require demonstrable local economic contribution rather than minimal infrastructure presence. Operators whose activities have been newly brought into the licensing perimeter — including affiliate and marketing promotion under the new GOSS licence, and overseas B2B suppliers to Gibraltar licensees — additionally carry the conditions attached to the six-month transitional licence under Schedule 8, paragraphs 4 and 5, which applies only to activity that requires a licence under the 2025 Act but did not under the 2005 Act and remains valid beyond six months where a complete application is filed within the window. Both sets of obligations are confirmed and durable, fixed in the primary Act and its schedules rather than in revocable regulator guidance. The

practical operational consequence is a compressed compliance-and-requalification workload, though the existing operator base is not itself on a six-month clock: under Schedule 8, paragraph 2 an operator licensed immediately before commencement is treated as holding a 2025 Act licence until the Authority issues a replacement.

Reporting obligations

- Digitised Regulatory Reporting: Gambling Act 2025 (Gibraltar)
- Aml Cft Reporting: Proceeds of Crime Act 2015 (Gibraltar)

Advertising & Marketing

Status: Amber

Under the Gambling Act 2025, all marketing activities conducted 'in or from Gibraltar' fall within regulatory scope, bringing affiliates, group marketing hubs and creative agencies into the GOSS licensing perimeter. Marketing requires a support-service licence unless provided by a group company already licensed in Gibraltar. The regulator has signalled that marketing carried out from minimal-presence Gibraltar subsidiaries (often for VAT savings) would likely be refused a marketing support licence.

CONTEXT & EVIDENCE

Cost to Operate

Status: Amber

The dominant cost-side development this cycle for Gibraltar-domiciled operators is external: the UK's Remote Gaming Duty rose from 21% to 40%, effective 1 April 2026, a durable, Probable-confidence change sourced via a T4 secondary tracker of cross-border cost impact on Gibraltar operators. Because this is a UK fiscal instrument rather than a Gibraltar one, it leaves Gibraltar's own regime untouched but materially raises the effective cost of serving UK customers, likely compressing margins for UK-facing operators more than any Gibraltar-domestic change identified this cycle. No other cost-to-operate evidence — such as a revised Gibraltar-domestic levy — surfaced this cycle.

Expert-reviewed text · 2026-09-26

From 1 April 2026 the United Kingdom increased Remote Gaming Duty from 21% to 40% on profits from remote gaming with UK persons. This is a UK tax charged on a place-of-consumption basis. It does not amend Gibraltar's gambling-duty rates, but it increases the tax charge on UK-facing remote-gaming activity wherever the operator is established.

Fee schedule

- Annual Licence Fee B2C: GBP 50,000 (GGY <£20m) / GBP 100,000 (GGY £20m–£300m) / GBP 200,000 (GGY >£300m), per licence per vertical
- Annual Licence Fee B2B: GBP 85,000 (single vertical) + GBP 15,000 per additional vertical
- Application Fee: B2C: GBP 30,000 (betting or gaming), GBP 20,000 (lottery), GBP 15,000 (betting intermediary or agent). B2B: GBP 20,000 (gaming aggregator, platform supplier), GBP 10,000 (direct integration), GBP 8,000 (contracted-out fraud/risk, CDD/compliance or ID-verification services). Gambling support services: GBP 8,000
- Change Of Control Fee: GBP 3,000 base fee, rising to a maximum of GBP 30,000
- Gaming Duty: 0.15% of GGY; first GBP 100,000 exempt
- Application Fee Prediction Market: GBP 30,000
- Annual Licence Fee Prediction Market: GBP 100,000
- Duty Prediction Market: 0.15% of commission charged

Taxes

Status: Amber

Gambling duties are charged under section 175 of the Gambling Act 2025 and Schedule 1 to the Gambling (Duties and Licence Fees) Regulations 2026, LN.2026/065, at 0.15% on three bases: general betting duty on gross betting profit, general gaming duty on gross gaming profit, and betting-intermediary or agency duty on gross intermediary profit (commission received). The first £100,000 is exempt for general betting and general gaming duty, but not for intermediary or agency duty. Free bets, free spins, bonuses and other promotional incentives are not deductible in computing gross profit. Duty is paid in four quarterly instalments due on 1 April, 1 July, 1 October and 1 January, each payable by the last day of the month in which it falls due, and the Regulations contain an anti-avoidance rule for artificial arrangements. For non-remote operations, LN.2026/088 (regulation 5) charges B2C premises operators a duty of £1,000 per gaming machine made available per licensing year, whether supplied by the licence holder or a connected person; B2B machine suppliers pay £250 per licensing year plus £1,000 per machine supplied for use on premises to which the public have access, with no fee for equipment used solely for placing bets; and machine-only premises licences pay £250 per premises and £100 per machine. Gibraltar has no VAT.

Payments & Money Flow

Status: Green

Holding or managing customer funds in connection with gambling was brought into the Gambling Act 2025's licensing perimeter as part of the GOSS activity category from the Act's 1 April 2026 commencement. Businesses newly caught by this change were given a six-month transitional licence under Schedule 8 of the Act, and that window closed on 1 October 2026. A business holding or managing customer funds for a Gibraltar-licensed gambling operator that did not file a full licence application before the deadline no longer holds transitional protection for that activity and must now proceed through the full application process to continue lawfully.

Expert-reviewed text · 2026-09-26

The Property (Digital Assets etc) Act 2026, in operation from 23 March 2026, provides that a thing, including one digital or electronic in nature, is not prevented from being an object of personal-property rights merely because it is neither a thing in possession nor a thing in action. This is a general property-law clarification. It does not establish that every token is property in every circumstance, and it does not decide whether a particular token, payment structure or gambling product is lawful or falls within a particular regulatory category.

Expert-reviewed text · 2026-09-26

The Gambling (Duties and Licence Fees) Regulations 2026, LN.2026/065, set GOSS fees. Each GOSS licence application carries a non-refundable £8,000 application fee (Schedule 2). Annual fees (Schedule 3) are £50,000 for marketing or affiliate services (£25,000 where annual sales are below £200,000), £5,000 for relevant-company ownership and £50,000 for holding or managing customer funds other than by a licensed credit institution. A Marketing Services licence is ordinarily available only for marketing a gambling business carried on by a Gibraltar licence holder, and a Relevant Company Ownership licence is not ordinarily available to a Gibraltar-established or Gibraltar-managed person, in each case

subject to ministerial discretion (section 37(6)–(9)). The annual figures are not the full first-year entry cost.

Expert-reviewed text · 2026-09-26

Regulation 22 of the Prediction Market Regulations 2026 provides that an authorised operator may use digital-asset payments, including stablecoins, for funding participant accounts, providing collateral, settling transactions, making payments to participants and permitting withdrawals. Using a digital-asset payment method does not, of itself, change the legal character of a prediction-market contract or cause the operator to carry on any other regulated activity. The authorisation covers prediction-market activity only, and AML and sanctions obligations apply in full; prediction-market activity is relevant business under the Proceeds of Crime Act 2015.

Payments & Banking

Status: Green

Gibraltar operates an open, UK-aligned financial system. Customer funds must move through company-controlled bank and merchant accounts. The Gambling Commissioner is the AML/CFT regulator for the sector under the Proceeds of Crime Act 2015 (Gibraltar). Banking access is generally available but operators must maintain disciplined controls; the Gibraltar Authorisation Regime (GAR) supports PSP/EMI access to the UK market post-Brexit.

Market Opportunity

Status: Green

Gibraltar's new prediction-market category, established under the Prediction Market Regulations 2026 (LN.2026/176, in force 13 July 2026), creates a standalone commercial vector distinct from traditional betting, gaming and lottery products, and one that expressly permits stablecoin and digital-asset funding and settlement. This sits alongside the Property (Digital Assets etc) Act 2026, which confirms that a digital or electronic thing is not barred from being the object of personal-property rights merely because it is neither a thing in possession nor a thing in action. That improves legal clarity but does not of itself extend digital-asset permissions to ordinary gambling licences, and is not evidence of quantified market demand for crypto-native gambling and prediction-market products. Together these developments layer novel commercial opportunity onto Gibraltar's existing DLT regulatory infrastructure, opening a route for operators building crypto-settled products that would not previously have had clear legal footing. The scale of the resulting market opportunity has not itself been quantified this cycle.

Expert-reviewed text · 2026-09-26

The Prediction Market Regulations 2026, LN.2026/176, establish a prediction-market authorisation regime. Regulation 22 permits authorised operators to use digital-asset payments, including stablecoins, for funding participant accounts, collateral, settlement, payments to participants and withdrawals, and provides that doing so does not of itself change the legal character of a contract or cause the operator to carry on another regulated activity. Separately, the Property (Digital Assets etc) Act 2026 provides that a digital or electronic thing is not prevented from being an object of personal-property rights merely because it is neither a thing in possession nor a thing in action. The Gambling Act 2025 also defines "money" to include digital payment and "money's worth" to include

crypto currencies and financial instruments. None of these provisions by itself resolves the gambling, financial-services, property or AML questions a crypto-funded product may raise.

Expert-reviewed text · 2026-09-26

The substantive prediction-market regime is in the Prediction Market Regulations 2026, LN.2026/176, in operation from 13 July 2026. Fees and duty are set separately by the Prediction Market (Fees and Duties) Regulations 2026, LN.2026/316, in operation from 13 August 2026: a £30,000 application fee, a £100,000 annual fee and general prediction-market duty of 0.15% of commission charged, with no exemption threshold. Fees and duty are therefore published, not pending.

Entry Pathways

Entry into Gibraltar's licensed gambling market runs through the Gambling Act 2025's Part 4 licensing structure, administered by the Gambling Commissioner, for betting, gaming and lottery activity. For businesses newly brought within the licensing perimeter by the 2025 Act, principally B2B suppliers, contracted-out service providers, marketing affiliates and controllers of more than 25 percent of a licensed company, Schedule 8 provided a transitional six-month filing window from the 1 April 2026 commencement date. That window closed on or about 1 October 2026, meaning a newly-caught business had to have filed a full and complete licence application by that date to continue trading under transitional protection; existing 2005 Act licence holders face no equivalent deadline, being automatically grandfathered. A separate entry pathway exists for prediction market activity under the Prediction Market Regulations 2026, which is expressly not classified as betting, gaming or a lottery under the Gambling Act 2025 and is instead authorised under its own regime, with a dedicated fiscal and licensing fee framework established under the Act's enabling powers in sections 155 and 175.

Expert-reviewed text · 2026-09-26

The Gambling Act 2025 organises licensable activities into B2C, B2B and Gambling Operator Support Services (GOSS) licences (section 17(6)–(8)). A licence covers either remote or non-remote activity, not both (section 38(3)). The Gambling (Duties and Licence Fees) Regulations 2026, LN.2026/065, in force from 1 April 2026, set non-refundable application fees in Schedule 2 and annual fees in Schedule 3; non-remote fees are set by LN.2026/088. GOSS covers marketing or affiliate services for gambling, relevant-company ownership and holding or managing customer funds in connection with remote gambling other than by a licensed credit institution; each GOSS application carries an £8,000 application fee. Marketing Services licences are ordinarily granted only for marketing a gambling business carried on by a Gibraltar licence holder, and Relevant Company Ownership licences are not ordinarily granted to Gibraltar-established or Gibraltar-managed persons, in each case subject to ministerial discretion (section 37(6)–(9)). Part 5 regulation of individuals remains uncommenced.

Expert-reviewed text · 2026-09-21

A person licensed under the 2005 Act immediately before commencement is treated under Schedule 8, paragraph 2 as holding a licence granted under the 2025 Act until the Authority issues a replacement, and is not required to apply for it; there is no fixed six-month expiry on that continuation. The six-month transitional licence under Schedule 8, paragraphs 4 and 5 applies only to activities that require a licence under the 2025 Act but did not under the 2005 Act, and it remains valid beyond six months where a complete application is filed within the window.

Licence types

- B2C Gambling Operator'S Licence: Gambling Act 2025 (Gibraltar)
- B2B Gambling Operator'S Licence: Gambling Act 2025 (Gibraltar) \$19, \$30
- Gambling Operator Support Services (Goss) Licence: Gambling Act 2025 (Gibraltar) \$17(1)(f)

Product coverage

Product	Status
Casino	Open
Poker	Open
Betting	Open
Skill Games	Open
Lottery	Open
Software B2B	Open
Bingo	Open
Other Event Betting	Open
Horse Racing	Open
Exchange Betting	Open
Pool Betting	Open
Virtual Events Betting	Open
Prediction Markets	Open
Free Play	Open
Affiliate Marketing	Open
Payments For Gambling	Open
Betting Agent	Open

Competitive Landscape

Status: Green

Gibraltar's Minister for Justice and Trade has cited the UK's increase of Remote Gaming Duty to 40 percent from April 2026 as competitive pressure motivating expansion of Gibraltar's gambling sector beyond reliance on UK licences. This signal, while uncertain in confidence and drawn from a single secondary source, indicates that cross-jurisdictional tax dynamics in the UK are shaping Gibraltar's competitive positioning and policy rationale for broadening its own regulatory offer, including the new prediction-market and digital-asset-adjacent categories introduced this cycle. No operator-count, market-concentration or unlicensed-market-share data was evidenced this cycle.

Expert-reviewed text · 2026-09-26

The United Kingdom increased Remote Gaming Duty from 21% to 40% from 1 April 2026. Remote Gaming Duty is charged on profits from remote gaming with UK persons wherever the operator is established, so the change affects Gibraltar-based operators serving the UK market but does not alter Gibraltar's own gambling-duty rates. Any view about Gibraltar's policy response or competitive positioning is attributed commentary, not an established legal fact.

Further expert-reviewed text

Regulated Activity Classes

Expert-reviewed text · 2026-09-26

The substantive regime is in the Prediction Market Regulations 2026, LN.2026/176, in operation from 13 July 2026. The separate Prediction Market (Fees and Duties) Regulations 2026, LN.2026/316, made under sections 155 and 175 of the Act, came into operation on 13 August 2026. The two dates relate to different instruments and must not be conflated.

Expert-reviewed text · 2026-09-26

The Prediction Market Regulations 2026, LN.2026/176, made under sections 34 and 159 of the Gambling Act 2025, establish prediction-market activity as a separately authorised activity from 13 July 2026. Applications are determined by the Authority, and supervision and enforcement rest with the Commissioner; appeals lie to the Supreme Court rather than the Gambling Appeals Tribunal. The requirement for authorisation is subject to the Part 4 licence and Financial Services Act 2019 exceptions in regulation 6(6). An authorisation is not a Part 4 licence and does not itself authorise any other regulated activity.

Expert-reviewed text · 2026-09-26

The Prediction Market Regulations 2026, LN.2026/176, came into operation on 13 July 2026 and establish a prediction-market authorisation regime, with contract approval, a power for the Authority to prohibit or restrict classes of contract by direction, and market-integrity, governance, participant-protection, safeguarding and wind-down requirements. The regime is distinct from the Act's B2C, B2B and GOSS licence categories. The requirement for authorisation is subject to the Part 4 licence and Financial Services Act 2019 exceptions in regulation 6(6). An authorisation is not a Part 4 licence and does not itself authorise any other regulated activity.

Expert-reviewed text · 2026-09-26

The Prediction Market Regulations 2026 establish a prediction-market authorisation regime alongside the Act's B2C, B2B and GOSS licence framework. Prediction-market activity is a distinct activity and is not treated as betting, gaming or a lottery solely because of its prediction-market characteristics. The regime is an authorisation, not a licence category, and it is not the only lawful route: the requirement does not apply to a Part 4 licence holder whose regulated activities include prediction-market activity or to a qualifying Financial Services Act 2019 permission holder dealing in financial instruments. An authorisation does not itself authorise any other regulated activity.

Expert-reviewed text · 2026-09-26

The 2025 framework widens Gibraltar's regulatory perimeter in two material respects. First, section 17(1)(f) makes Gambling Operator Support Services licensable: advertising or marketing services for gambling wherever in the world the gambling takes place (except exempt advertising or marketing), relevant-company ownership, and holding or managing customer funds in connection with remote gambling (except by a licensed credit institution). Intra-group and self-supply to a licence holder is excluded, other than for relevant-company ownership (section 17(2)–(3)). Marketing Services and Relevant Company Ownership licences are further confined by section 37(6)–(7), subject to ministerial discretion. Second, the Prediction Market Regulations 2026 establish a separate prediction-market authorisation regime from 13 July 2026. The prediction-market authorisation is not a Part 4 licence, and the requirement for it does not apply to a Part 4 licence holder whose regulated activities include prediction-market activity or to a qualifying Financial Services Act 2019 permission holder dealing in financial instruments.

Gaps Register

Evidence gaps identified by the pipeline — areas where confirmation from primary sources is outstanding.

- **[adv-int-20261025-GI-G001]** No GI Gambling Commissioner enforcement notices dated within the 2026-10-18 to 2026-10-25 window were located; a direct GI regulator enforcement log would confirm whether domestic enforcement activity occurred.

- **[adv-int-20261025-GI-G002]** Codes of practice issued progressively by the Commissioner since 1 April 2026 were not individually traced this cycle.
- **[adv-int-20261025-GI-G003]** Penalty reference for failure to file by the Schedule 8 transitional deadline was not pinned to a specific provision this cycle.

Sources & Provenance

14 sources. T1 = primary instrument/regulator; lower tiers = secondary. Inline [SRC-XX] markers link to this table.

ID	Tier	Source / instrument	URL
SRC-GI-001	T1	GI-GAMBLING-ACT-2025	https://www.gibraltarlaws.gov.gi/uploads/legislations/gambling/2026-04/2026-04o.pdf
SRC-GI-002	T1	GI-GAMBLING-ACT-2005	https://www.gibraltarlaws.gov.gi/uploads/legislations/gambling/2005-72/2005-72o.pdf
SRC-GI-004	T3	GI-HASSANS-SCOPE	https://www.gibraltarlaw.com/insights/post/102iwpy/licensing-under-the-new-gibraltar-gambling-act-do-you-fall-within-scope/
SRC-GI-005	T3	GI-RAMPARTS-STRUCTURAL	https://ramparts.gi/gamblingact2025enactment/
SRC-GI-006	T3	GI-IGB-NEWERA	https://igamingbusiness.com/legal-compliance/gibraltar-new-gambling-act-2025-questions-unanswered/
SRC-GI-008	T3	GI-PWC-TAX	https://taxsummaries.pwc.com/gibraltar/corporate/other-taxes
SRC-GI-012	T3	GI-RAMPARTS-BILL	https://ramparts.gi/the-gibraltar-gambling-bill-2025/
SRC-GI-013	T1	GI-LN-2026-065	https://www.gibraltarlaws.gov.gi/uploads/legislations/gambling/2026s065/2026s065.pdf
SRC-GI-014	T2	Remote Gaming Duty 21% 40% 1 April 2026 ... General Betting Duty - remote	https://www.gov.uk/government/publications/changes-to-gambling-duties/gambling-duty-changes
SRC-GI-015	T1	GI-PROPERTY-DIGITAL-ASSETS-ACT-2026	https://www.gibraltarlaws.gov.gi/uploads/legislations/property/2026-09/2026-09o.pdf
SRC-GI-016	T2	The licence was granted to Predict Street Ltd as a betting intermediary under th	https://www.yogonet.com/international/news/2026/04/03/118396-gibraltar-grants-first-license-to-prediction-markets-operator-amid-regulatory-changes
SRC-GI-017	T1	GI-PREDICTION-MARKET-REGS-2026	https://www.gibraltarlaws.gov.gi/uploads/legislations/gambling/2026s176/2026s176.pdf
SRC-GI-018	T1	GI-PREDICTION-MARKET-FEES-REGS-2026	https://www.gibraltarlaws.gov.gi/uploads/legislations/gambling/2026s316/2026s316.pdf
SRC-GI-021	T1	GI-LN-2026-088	https://www.gibraltarlaws.gov.gi/uploads/legislations/gambling/2026s088/2026s088.pdf

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