NEWSletter



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INTERNATIONAL CONFERENCE PROGRAM PUBLISHED



Responsible Gaming Week (November 3–9, 2025) is approaching, as are the upcoming international conferences in Prague. **You can find out which speakers you can look forward to on the website, where a detailed program for both days is available**.

A little teaser:

Martin Šabo (Director of the Gambling Department at the Ministry of Finance) and former regulators Claire Pinson (France) and Morten Ronde (Denmark), Gustaf Hoffstedt (Secretary of BOS – Swedish Online Betting Association) have confirmed their participation on the first day and will discuss illegal gambling from the perspective of regulators.

Robert Klobucký from the Slovak Academy of Sciences will present the findings of his research on how players view illegal gambling.

Simo Dragicevic, Šimon Vincze from Casino Guru, and Jakub Žofčák from CETA will discuss methods of measuring illegal gambling.

The second day will feature Sally Gainsburry (Professor of Psychology at the University of Sydney), Simo Dragicevic (co-founder of The Game Safety Institute), Mark Griffiths (psychologist at Nottingham Trent University), and Francesco Rodano (Playtech). The common theme of their presentations will be various aspects of responsible gaming – when rules protect players and when they drive them to illegal operators, the use of AI and eye-tracking technology, and how website design can promote responsible gaming.

SFA PRESENTED THE MAIN DEFICIENCIES OF TAX RETURNS

The IPRH, in cooperation with the Specialized Financial Authority (SFA), organized a workshop on the topic *of gambling tax administration*, the main objective of which was to present the main shortcomings in the data reported in tax returns compared to those reported in the reporting.

The SFA pointed out that the reported data often does not correspond to tax returns. Therefore, it first focuses on internal cleaning and only then contacts operators and asks them to explain the discrepancies between tax returns and reporting. The Office is aware that operators do not have access to the data provided and **therefore supports efforts by the Ministry of Finance (MF) to make at least summary data available to them**, which would enable them to carry out checks on their part.

The SFA also mentioned that the timeliness of the data would also be improved if **the operator** were **informed of corrections to data sent outside of so-called rollbacks**, as it only learns about these from the MF system with a considerable delay. The IPRH will prepare a template for such a notification.

As part of its cooperation, the SFA explained why it requires information about which player is hidden behind a specific player account ID. This data is necessary for monitoring non-standard movements and removing duplicate data. The Office emphasized that it is acting in accordance with its legal powers.

The SFA now uses advanced analytical tools to monitor

odds betting and plans to increase its monitoring activities in this area. In technical games, it focuses primarily on comparing readings from physical slot machines with data in the AISG and on the correct reporting of jackpots, which is often incorrect—for example, winnings from the main game and from the jackpot are not distinguished or are reported twice. Several operators also still use the IN/OUT reporting system, which distorts the resulting data.

A significant part of the SFA's activities is the fight against illegal gambling. The office focuses on the actual organizers and organized groups, while also cooperating with the Czech Police. **Since 2017**, **the SFÚ has assessed additional tax for illegal gambling operations in the amount of approximately CZK 450 million**, with illegal online gambling accounting for CZK 400 million, of which approximately 40% of the additional tax assessed was collected. In the case of illegal land-based gambling, the relevant amount was even paid in full.

AUTUMN MEETING OF IPRH MEMBERS



This time, the regular meeting of members took place at a new location, the Grandium Hotel Prague. There were many topics for discussion.

In the introduction, we discussed the currently debated self-regulation of advertising and the new Advertising Code, effective from September 1, 2025, which was created in cooperation between IPRH members and other entities. The Code is intended to be the main argument against further tightening by the state. Using examples from abroad, we showed that advertising regulation is tightening across Europe, but blanket bans are gradually being abandoned as ineffective and promoting illegal gambling.

In the statistics section, we presented the growing use of the Panic Button. **The use of registration in the Register of Excluded Persons via the Panic Button (67.4%) far exceeds registration via the Ministry of Finance (32.6%).** The most common reasons remain insolvency and receipt of social assistance benefits.

In the AML section, attention was drawn to the FAÚ questionnaire survey, which will take place at the beginning of October and is binding for obligated entities. New developments in the lists of high-risk countries and methodological guidelines were also discussed, including the new Guideline No. 9 for customer due diligence. At the same time, the IPRH is addressing with the FAÚ the different approaches of customs authorities during inspections.

Current topics in European legislation include the EAA, DSA, and the new cybersecurity law, effective from November 1, 2025. In this area, we are investigating how its requirements will affect gambling manufacturers.



The IPRH also reported on negotiations with the Chamber of Bailiffs regarding the technical solution for entering persons in enforcement proceedings into the Register and on communication with the Ministry of Justice regarding the delayed transcription of persons in insolvency.

Topics for further discussions with the Ministry of Finance were also discussed, such as the licensing of Crash games and Plinka, access to Live dealer games, and the issue of virtual chips.

In terms of legislative news, we mentioned the amendment to the Gambling Act (newly inserted Section 15a) aimed at enabling the implementation of a program to reduce the risks of gambling and the exchange of data between operators, as well as the expected new reporting decree. Finally, a change to the IPRH statutes was presented, introducing Enhanced Cooperation, which will enable active members to implement new projects with their own funding.

KLADNO REJECTED A TOTAL BAN ON GAMBLING IN THE CITY IN A REFERENDUM. HOWEVER, IT TIGHTENED TIME REGULATIONS.

Along with the October elections to the Chamber of Deputies of the Czech Republic, a repeat local referendum was held in Kladno on the adoption of a ban on gambling within the city. **Once again, it did not pass due to low voter turnout, which was 25.10%.** A 35% turnout was required for the decision in the local referendum to be valid. This was the second referendum held in Kladno, as the first was successfully challenged in court. However, according to the current mayor of Kladno, Milan Volf, the ongoing debate about gambling in Kladno is much ado about nothing. *"The referendum was held for the second time and was about something that does not exist. We have no problem with gambling in Kladno. Despite the high turnout in the elections, the percentage turnout in the referendum was even lower than in January 2023, when it was held in conjunction with the presidential elections. That speaks for itself. I would like to point out that this is the work of STAN and the Pirates, and I consider the behavior of some agitators who persuaded and forced people to vote in the referendum, stopped pensioners, and so on, to be outrageous and unfit for today's society. I would not be at all surprised if we were to face another lawsuit to hold this unnecessary referendum for the third time.*

Even before the referendum was held**, an amendment to the generally binding decree on the regulation of nighttime noise** was adopted**, effective October 3**, **2025**, which sets time restrictions on the operating hours of other casinos in the city. Specifically, this concerns two casinos operated on Třída ČSA Street.

UPDATE OF METHODOLOGICAL GUIDELINES IN THE AML AREA

The Financial Analytical Office (FAO) has updated and issued the following methodological guidelines relating to our sector. Which ones specifically?

- **No. 8 – Copying identity documents for the purposes of the AML Act** – the obligated entity should not make copies of identity documents for all clients across the board. However, according to the FAO, it is appropriate to make copies of identity documents in cases where the obligated entity detects a risk of money laundering, as well as in cases involving foreign clients or where the document appears to be damaged or shows signs of forgery/alteration. The obligated person may use such a copy only for the purposes of the AML Act. The consent of the holder of such a document is not required to make a copy of the document.
- **No. 9 – Client verification** – the word *"not only"* (intended not only for credit and financial institutions) has been added to the title of this methodological guideline. There is no longer any doubt that it also applies to our sector until

any doubt that it also applies to our sector until the FAÚ proceeds to draft a new methodological guideline specifically for the gambling sector. This methodological guideline contains guidance on how and to what extent to perform customer due diligence, what documents to require in the case of enhanced customer due diligence, etc.

No. 11 – Risk assessment and internal policy system – The FAO emphasizes that the internal policy system must be a specific, instructive document that sets out procedures for employees and includes a definition of competences and responsibilities in the performance of individual duties under the AML Act. At the same time, it points out that this document should not be prepared by external companies that prepare it for various types of obligated entities, as they cannot know in detail the gambling environment and the actual internal functioning of a specific company.

EUROPEAN GAMBLING INDUSTRY WARNS AGAINST STRENGTHENING THE BLACK MARKET



Legal gambling operators are increasingly warning of the risk that excessive regulation and restrictions on legal offerings will drive customers to illegal alternatives. According to industry representatives, the gap between the regulated and unregulated markets is widening, and the black market is evolving from a marginal phenomenon into a significant player that threatens both consumer protection and public finances.

The industry is therefore seeking to educate consumers more about the risks of illegal gambling and is calling for cooperation among a wider range of actors—from regulators and policymakers to payment companies and social networks that facilitate access to gambling services.

Stricter regulation and tax burden

According to the industry, one of the key problems is the growing tax and regulatory burden. New player protection rules introduced in recent years in countries such as the Netherlands and Sweden are intended to enhance customer safety, but at the same time they reduce the attractiveness of legal offerings.

The Dutch regulator recently announced that tax revenues from gambling in 2025 will fall by more than €40 million compared to the previous year precisely because of these measures. In Sweden, the government is preparing to tighten gambling laws, including extending their scope to payment services and stricter criminal liability for operating or promoting illegal gambling.

However, according to experts, the problem is that legally licensed products are not attractive enough for players. Illegal operators, on the other hand, offer more lenient conditions, higher return to player (RTP) rates, and more aggressive marketing.

Innovation in decline

Another factor weakening the competitiveness of legal companies is the increasing complexity of regulatory requirements. Part of the technological capacity of licensed companies is now devoted primarily to compliance, which limits the scope for new product development and innovation.

Industry representatives point out that gambling is a digital service that is easy for customers to find outside the legal environment. If the offer of licensed operators becomes too limited, players will find their way to the black market, where no restrictions or consumer protection apply.

What's next

In response to growing concerns, European governments are expected to update their legislative frameworks and strengthen the powers of regulatory and enforcement authorities, particularly in the area of payment transactions and blocking access to illegal websites. At the same time, it can be assumed that more research projects mapping the extent of the black market will emerge, similar to those in the UK.

The gambling industry thus faces a double challenge: to ensure a sustainable level of regulation that does not deter customers from legal offerings, while actively contributing to consumer protection and the fight against illegal operators.

NEWS FROM OUR SLOVAK NEIGHBORS



There has been a lot going on in Slovakia recently in the field of gambling. From a proposal for new gambling taxation, stricter regulations in the fight against illegal gambling, a proposal to limit bonuses (free spins), a new methodology for assessing advertising for gaming venues, and a change in the position of CEO.

Ms. Libuša Baranová became **the new CEO** of the Office for the Regulation of Gambling on October 1 this year.

The situation regarding **new taxation** is rapidly changing. The coalition council has finally agreed on an update to tax rates, with the main goal being to collect €45-58 million more in gambling taxes than before. The increase primarily affects online gambling, sports betting, and technical games:

- Online gambling and betting – increase from 27% to 30% of GGR;
- Technical equipment in gaming halls and casinos, for which flat fees remain in place:
  - electromechanical roulette - increase from €4,000 to €4,700 for the state budget;
  - VLT – increase from EUR 4,700 to EUR 6,000 for the budget;
  - VHP – increase from EUR 4,000 to EUR 9,300 for the budget.

The amount of the levy for municipalities remains unchanged. However, the proposal is still subject to change. Minister of Sport R. Huliiak has introduced an amendment that **would mean the amount of fees for technical gaming devices would no longer be set by law, but by government decision**. In terms of effectiveness, the increase in rates for internet games should take effect on December 1, 2025 (this date is still under discussion, as tax laws usually take effect on January 1 and July 1), and the change in the method of determining flat-rate payments for equipment is to take effect on January 1, 2026.

This proposal also includes **stricter regulatory measures to combat illegal gambling**, consisting of expanding the concept of prohibited advertising to include the provision of advice and tips on how to use tools to circumvent blocking or blocking applications with illegal content.

Other proposals to amend the Gambling Act relate to extending the ban on bonuses to include freespins provided outside the game and a proposal to introduce an obligation for operators to send account statements to players by post. Fortunately, both are still in the draft stage and are not expected to be adopted.

A major success for our Slovak colleagues at the Institute for the Regulation of Gambling is **the relaxation** of methodological guidelines for assessing advertising for gaming establishments and casinos. Previously very strict rules regarding the size and design of gambling hall and casino signage have been relaxed by the regulator following a series of expert discussions. Operators' logos may be used. Signage may be larger than before, etc.

UKRAINE EASES GAMBLING REGULATIONS

Ukrainian politicians are trying to make the national market more attractive to gambling license holders by easing their tax burden and expanding advertising rights.

Natalia Denikeieva, Deputy Minister of Digital Economy Development of Ukraine, said at the SBC summit in Lisbon that, based on feedback from the industry, the ministry had set priorities for legislative changes, including an amendment to the tax code in the second half of the year. She admitted that the current rules and taxation are not fair to license holders. The aim is to curb the black market and "make illegal business as complicated and expensive as possible." A working group will be set up with market stakeholders to evaluate the existing rules and propose measures.

There are no plans to tighten advertising laws; the aim is to remove illegal advertisements and open up new opportunities for legal operators. Following recent negotiations with Google, Denikeieva said that license holders can now use the tech giant to promote their products. Further negotiations are underway with Meta.

BRITISH PLAYERS ARE FLOCKING TO THE BLACK MARKET, OFTEN TO BYPASS THEIR OWN SELF-EXCLUSION



The UK Gambling Commission **warns of a growing number of players turning to unregulated gaming sites.** According to the latest research, one of the main reasons is to circumvent self-exclusion from gambling. Other motivations include better bonuses, more favorable odds, or the ability to bet in cryptocurrencies.

The research shows that some players who have voluntarily blocked their access to gambling on the licensed market are turning to illegal sites. This exposes them to even greater risks.

The Commission has divided black market users into four groups. The first group consists of those who have excluded themselves. The second group is "experienced players" who are looking for higher winnings, anonymity, and more flexible conditions for deposits and withdrawals. The third group consists of people who have accessed unregulated games through social networks and often do not even realize that they are playing with an unlicensed operator. The last group consists of casual users who stray into the black market without checking whether the site has a UK license.

The research also confirms that the typical black market customer is a man who gambles more often than average and falls into the risky category of problem gambler.

In recent months, the Commission has stepped up investment in researching the black market, as there

has been a long-standing lack of detailed data on its size and nature. It is precisely this lack of knowledge that has often been criticized by regulated operators, who argue that overly strict rules can discourage customers and push them into the illegal environment.

The threat of higher taxes

The debate on the black market is also being influenced by a planned tax increase. The British gambling industry is awaiting a decision by Finance Minister Rachel Reeves, who may increase the tax rate to up to 50 percent of online gambling revenues.

Operators warn that such a move would jeopardize their profitability and drive even more customers to illegal websites. **According to the Betting and Gaming Council (BGC), the black market is already used by around 1.5 million Britons, who bet £4.3 billion a year.** If the state does not intervene, it could lose up to £335 million in tax revenue during the election period.

"The regulated UK market operates under some of the strictest rules in the world. The black market offers none of this and does not protect customers," said a BGC spokesperson.

COLOMBIAN REGULATOR TRIES TO BLOCK POLYMARKET



Colombian gambling regulator Coljuegos has decided to block the Polymarket platform, which offered prediction markets in the country and accepted bets via cryptocurrencies. According to the regulator, this is an illegal form of gambling because the operator does not have the necessary license.

Internet service providers have been asked to block access to the site. At the same time, an investigation has been launched into the people behind the website. Although Polymarket presents itself as a tool for predicting future events, according to Coljuegos, it fulfills all the characteristics of gambling, including the risk of a deposit, expected winnings, and a result dependent on an uncertain event.

The Colombian gambling system is based on a state-controlled monopoly, and therefore any betting is subject to Coljuegos' approval. Currently, only 14 legal online gaming operators are licensed in the country.

According to the regulator's statistics, more than 28,000 illegal websites have been requested to be blocked so far, and thousands more are expected to be added in the near future. The blocking of Polymarket is thus part of a broader strategy aimed at strengthening market control and protecting players from illegal operators.