Curacao

Online casino launch roadmap

Curacao Gaming Authority (CGA), under the National Ordinance on Games of Chance (LOK)

No longer the one-week master licence sublet: since the LOK took effect on 24 December 2024 you apply to the CGA directly, in two review phases, with a local company, office and key people.

- Recommended path
- Optional, worth it
- Alternative route

LICENCE	TIME TO LAUNCH	GAMING TAX	SETUP COST	LOCAL PRESENCE	DIFFICULTY
B2C Gaming Licence (Remote Games of Chance) issued…	**4-8 months. Two phases of about 8 weeks each, each…**	**No gaming tax on gross gaming revenue and no VAT…**	**Application fee EUR 4,592 plus per-owner and…**	**Required: a Curacao legal entity (B.V. or N.V.), a…**	**Medium**

STAGE 1 · Weeks 0-6 — Market and legal feasibility

- What a Curacao licence is worth now — 1.1
- Understand the end of master licences — 1.3
- Check target market law first — 1.2
- Alternative: B2B supplier licence — 1.4

STAGE 2 · Months 1-4 — Corporate setup and licence application

- Curacao entity, director and office — 2.1
- Owners, fit and proper, source of wealth — 2.3
- Financial forecast and liquidity — 2.5
- Key persons under Article 5.12 — 2.2
- Apply through the CGA portal — 2.4

STAGE 3 · Months 2-6 — Platform and suppliers

- Operations manual in the CGA format — 3.1
- Critical records on local Tier-IV server — 3.3
- Registered domains and software — 3.2
- Use supplier licences as a gate — 3.4

STAGE 4 · Months 3-7 — Player protection, KYC and AML

- AML/CFT regulations — 4.1
- Complaints and ADR — 4.3
- Responsible Gaming Policy (v1.0) — 4.2
- Crypto policy for B2C operators — 4.4

STAGE 5 · Months 4-8 — Certification and testing

- RNG and game certification — 5.1
- Terms and conditions policy (Oct 2026) — 5.3
- Information security controls — 5.2

STAGE 6 · Months 4-8 — Payments and treasury

- Banking and PSP access — 6.1
- Fees and tax calendar — 6.3
- Player funds and ledger — 6.2

STAGE 7 · Months 6-9 — Go-live

- Licence or provisional licence — 7.1
- Staged launch — 7.3
- Advertising and affiliates — 7.2

STAGE 8 · From month 9 — Ongoing obligations

- Reporting and incident notices — 8.1
- Watch enforcement — 8.3
- Change of control — 8.2

Curacao: launch roadmap in detail

Curacao Gaming Authority (CGA), under the National Ordinance on Games of Chance (LOK) · as of 2026-11

Licence	B2C Gaming Licence (Remote Games of Chance) issued directly by the CGA, indefinite term subject to compliance and fees; a provisional licence (up to 6 months, extendable by 6) can be issued while the second review phase finishes. B2B suppliers of critical services need a separate Supplier Licence.
Time to launch	4-8 months. Two phases of about 8 weeks each, each extendable by up to 4 weeks, starting from a complete file. Preparing the file takes longer than the review.
Gaming tax	No gaming tax on gross gaming revenue and no VAT on gambling services. General profit tax is 15% up to XCG 500,000 and 22% above, reduced to 0% for companies meeting the substance requirements (Legal 500, November 2026).
Setup cost	Application fee EUR 4,592 plus per-owner and per-qualified-holder charges; annual fees about EUR 47,450 (EUR 22,960 CGA plus EUR 24,490 Treasury). CGA fee guidance v2.0 (October 2025) states USD 55,000 for B2C. Local office, staff, server and counsel are on top.
Local presence	Required: a Curacao legal entity (B.V. or N.V.), a Curacao-resident managing director, a physical office with local staff, and at least one full-time resident key person (rising to three from year five), subject to start-up exemptions.
Difficulty	Medium

1. Market and legal feasibility Weeks 0-6

1.1 What a Curacao licence is worth now RECOMMENDED

It is a legitimate mid-tier licence, not a passport to regulated Europe. It does not open the UK, Sweden, Denmark, Germany, Spain or France, and many payment providers and affiliates still treat it as a lower tier. Pick target markets that accept it, and write down which ones before spending on fees.

In the book: Ch. 06 Licensing Guide, Ch. 02 Regulation and Compliance Landscape, Ch. 41b Case Study: The Grey-Market Doorway and the Regulated Alternative

1.2 Check target market law first RECOMMENDED

A Curacao licence only covers what Curacao allows. Each market you sell into may have its own law, with blocking, payment bans or criminal exposure for the operator. Run each target through a jurisdiction matrix before launch.

In the book: Ch. 02 Regulation and Compliance Landscape, Ch. 27b The Jurisdiction Transfer Gateway and Cookie Consent, Ch. 24e Geofencing and Location Verification

1.3 Understand the end of master licences RECOMMENDED

The old model, where four master licence holders issued sub-licences, is gone. Old sub-licences ran out in January 2025 and the transitional arrangements for existing operators were extended into 2025-26. New applicants go straight to the CGA, so ignore sub-licence offers from resellers.

In the book: Ch. 06 Licensing Guide, Ch. 02 Regulation and Compliance Landscape, Ch. 07 Casino Implementation Planning and Timeline

1.4 Alternative: B2B supplier licence ALTERNATIVE

Suppliers of platforms, RNGs and game content (critical services and goods) need a Supplier Licence if established in Curacao, or must register with the CGA if foreign. If you sell a platform rather than run a casino, this is the route to read.

In the book: Ch. 06 Licensing Guide, Ch. 10b Supplier Integration Control Plane, Ch. 47d Casino as a Service: White-Label Provisioning at the Press of a Button

2. Corporate setup and licence application Months 1-4

2.1 Curacao entity, director and office RECOMMENDED

The applicant must be a Curacao legal entity (usually a B.V. or N.V.) with at least one Curacao-resident managing director or a Curacao-registered management company, a physical office with local personnel (virtual offices are not accepted) and locally kept accounts. Start hiring and leasing early, since the market for key persons and office space is thin.

In the book: Ch. 06 Licensing Guide, Ch. 09 Legal Framework and Contracts, Ch. 08 Team Structure and Operations

2.2 Key persons under Article 5.12 RECOMMENDED

A B2C licensee must employ at least one full-time key person registered in the Curacao Population Register, besides the managing director, rising to three from the fifth year after the LOK took effect. Start-ups may be exempt until their fourth fiscal year if they meet conditions on size and independent financial confirmations, and the Minister can grant up to two years more. Secondary sources report a deferral to 1 April 2027; confirm it with the CGA.

In the book: Ch. 06 Licensing Guide, Ch. 08 Team Structure and Operations

2.3 Owners, fit and proper, source of wealth RECOMMENDED

Anyone holding 10% or more is a qualified interest holder and the CGA reviews them. A licence is refused where a UBO or qualified holder above 25%, or a policy maker, was convicted of a relevant offence in the past eight years. Prepare KYC, police records, source of funds and source of wealth for each.

In the book: Ch. 06 Licensing Guide, Ch. 24d KYC Evidence Lifecycle, Ch. 09 Legal Framework and Contracts

2.4 Apply through the CGA portal RECOMMENDED

Forms include the Online Gaming Licence Application, the Business and Corporate Information Form and Personal History Disclosure forms. Phase 1 (integrity and finances) gets a decision in about 8 weeks, extendable by 4. Phase 2 (policies, technical documents) follows, with a provisional licence possible in between.

In the book: Ch. 06 Licensing Guide, Ch. 07 Casino Implementation Planning and Timeline

2.5 Financial forecast and liquidity RECOMMENDED

Expect to show business readiness and financial soundness, including forecasts and proof of liquidity (one secondary source says a three-year forecast). Show how player funds are held and how you pay winnings if volumes drop.

In the book: Ch. 06 Licensing Guide, Ch. 36 Financial Operations, Ch. 36b The Financial Truth Layer -- Ledger, Treasury, and Reconciliation

3. Platform and suppliers Months 2-6

3.1 Operations manual in the CGA format RECOMMENDED

Licensees must keep an operations manual following the CGA's guidelines and train staff yearly (Article 5.9). Write it around how your platform really runs, since the CGA can audit against it.

In the book: Ch. 33 Operational Playbooks, Ch. 47 Platform Onboarding: From Contract to First Real-Money Bet, Ch. 08 Team Structure and Operations

3.2 Registered domains and software RECOMMENDED

Every domain or app through which games are offered must be registered to the licence (EUR 250 each per a secondary source). Control domain changes through a release process, not through marketing teams.

In the book: Ch. 27b The Jurisdiction Transfer Gateway and Cookie Consent, Ch. 10b Supplier Integration Control Plane, Ch. 47 Platform Onboarding: From Contract to First Real-Money Bet

3.3 Critical records on local Tier-IV server RECOMMENDED

Legal 500 reports that critical records on players, gaming and financial transactions must be available to the CGA at all times on a server in a Tier-IV certified data centre registered in Curacao. Design a local replica or system of record early, and decide what syncs and how often.

In the book: Ch. 27 Data Residency and Backup/Recovery, Ch. 29e Datacenter Infrastructure for Africa and Offshore Jurisdictions, Ch. 29f Latin America Datacenter Infrastructure for Regulated Gaming

3.4 Use supplier licences as a gate RECOMMENDED

Critical suppliers (platform, RNG, game content) fall under the Supplier Licence or registration regime, with a CGA notice on supplier licensing and registration issued June 2026. Check supplier status before onboarding and refuse content from unregistered sources.

In the book: Ch. 10b Supplier Integration Control Plane, Ch. 09 Legal Framework and Contracts, Ch. 47b Configuration and Rules Distribution -- Feature Flags, Jurisdiction Rules, and the Propagation Model

4. Player protection, KYC and AML Months 3-7

4.1 AML/CFT regulations RECOMMENDED

The CGA AML/CFT regulations have been mandatory since 10 April 2025, built on NOIS and NORUT. CDD is required for transactions of NAf 4,000 (about EUR 1,926) or more, or on suspicion, with EDD for PEPs and crypto users. You need an independent compliance officer and MLRO resident in Curacao, and suspicious activity reports go to the local FIU.

In the book: Ch. 24d KYC Evidence Lifecycle, Ch. 19 Anti-Fraud System Deep Dive, Ch. 16 Cryptocurrency and DeFi Integration

4.2 Responsible Gaming Policy (v1.0) RECOMMENDED

Required tools: age verification beyond a single check, self-assessment, behavior tracking, cooling-off (24 hours to 3 months), self-exclusion (1 to 10 years or permanent, covering all brands under the licence), deposit limits, and no credit-based wagering. Appoint a Responsible Gaming Officer. Note that self-exclusion is operator-level; no national register is mentioned, so check your own cross-brand data.

In the book: Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 26b Self-Exclusion Registries: From API to Audit Trail, Ch. 47b Configuration and Rules Distribution -- Feature Flags, Jurisdiction Rules, and the Propagation Model

4.3 Complaints and ADR RECOMMENDED

Acknowledge complaints within one week, decide within four weeks (extendable once by four), and offer alternative dispute resolution at your own expense under the CGA ADR policy (v1.0, September 2025). Build the case workflow so deadlines are tracked automatically.

In the book: Ch. 33d Disputes, Chargebacks, and Player Support, Ch. 33b Workflow Engine and Case Management, Ch. 26 Responsible Gaming and Player Protection Systems

4.4 Crypto policy for B2C operators OPTIONAL

If you accept crypto, follow the CGA Crypto Policy Guideline (June 2026), including wallet segregation and blockchain analytics. Secondary sources describe banned personal wallets and split operational, treasury and player wallets; read the guideline itself.

In the book: Ch. 16 Cryptocurrency and DeFi Integration, Ch. 36 Financial Operations, Ch. 19 Anti-Fraud System Deep Dive

5. Certification and testing Months 4-8

5.1 RNG and game certification RECOMMENDED

Games must be fair and auditable with certified RNGs and approved software. The CGA has Testing Labs and certification policies and a test house application route. Use labs recognized elsewhere (GLI, iTech Labs, BMM) but confirm they are acceptable to the CGA before paying.

In the book: Ch. 17 Random Number Generation (RNG), Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 32 Testing and QA in Gambling

5.2 Information security controls RECOMMENDED

The CGA published Information Security Control Requirements. Map them to your existing ISO 27001 or similar program and keep penetration test and scan evidence ready. The CGA may require third-party certification of systems at any time.

In the book: Ch. 24 Security and Compliance, Ch. 23 DevSecOps for iGaming, Ch. 25b Regulatory Reporting and Evidence Export

5.3 Terms and conditions policy (Oct 2026) RECOMMENDED

The Terms and Conditions policy guidelines are in force from October 2026. Review bonus terms, withdrawal terms and dispute clauses against it. Keep a versioned record of every T&C change.

In the book: Ch. 09 Legal Framework and Contracts, Ch. 37 Marketing Technology and CRM Systems, Ch. 33d Disputes, Chargebacks, and Player Support

6. Payments and treasury Months 4-8

6.1 Banking and PSP access RECOMMENDED

Many banks and PSPs price Curacao risk higher. Prepare the licence, AML manual and ownership proof early, and expect enhanced due diligence. Local accounts are part of the substance requirement.

In the book: Ch. 36 Financial Operations, Ch. 36b The Financial Truth Layer -- Ledger, Treasury, and Reconciliation, Ch. 09 Legal Framework and Contracts

6.2 Player funds and ledger RECOMMENDED

Keep player balances separate in the ledger and reconcile daily. You must pay winnings without obstruction, and operator interventions must not be used to delay withdrawals.

In the book: Ch. 36b The Financial Truth Layer -- Ledger, Treasury, and Reconciliation, Ch. 36 Financial Operations, Ch. 35b Cash-Flow Integrity Incident Response

6.3 Fees and tax calendar RECOMMENDED

Invoices are due in 14 days at first, then annual fees by 15 January per CGA fee guidance v2.0. Profit tax depends on meeting substance. Fees may be adjusted yearly with the consumer price index.

In the book: Ch. 36 Financial Operations, Ch. 30 FinOps Deep Dive

7. Go-live Months 6-9

7.1 Licence or provisional licence RECOMMENDED

The CGA can grant a provisional licence while phase 2 finishes. Check what you may do under it before launching, and what conditions apply.

In the book: Ch. 07 Casino Implementation Planning and Timeline, Ch. 40 Case Study -- Launching in a New Regulated Market, Ch. 47 Platform Onboarding: From Contract to First Real-Money Bet

7.2 Advertising and affiliates RECOMMENDED

Advertising is allowed under Article 5.6 but must not target minors or vulnerable people or encourage excess. Affiliates are not licensed, but you answer for what they publish. Put the responsible gaming message and licence info into affiliate kits.

In the book: Ch. 37 Marketing Technology and CRM Systems, Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 09 Legal Framework and Contracts

7.3 Staged launch OPTIONAL

Start in one or two markets and watch KYC pass rates, withdrawal times and complaint volumes.

In the book: Ch. 33 Operational Playbooks, Ch. 35 Incident Management, Ch. 40 Case Study -- Launching in a New Regulated Market

8. Ongoing obligations From month 9

8.1 Reporting and incident notices RECOMMENDED

Periodic reports on operations, compliance and finances go to the CGA, with access to all data and systems for supervision. Material changes in operations or corporate structure need prior approval. Use the incident reporting portal.

In the book: Ch. 25b Regulatory Reporting and Evidence Export, Ch. 35 Incident Management, Ch. 34b Data Governance for iGaming Platforms

8.2 Change of control RECOMMENDED

Changes in UBOs and qualified interest holders need CGA approval under the change of control procedure. Plan investor deals around that approval time.

In the book: Ch. 09 Legal Framework and Contracts, Ch. 06 Licensing Guide

8.3 Watch enforcement RECOMMENDED

The CGA can issue orders, fines, suspension or revocation, and unlicensed operation is a criminal offence. Keep the compliance calendar current as the CGA is still issuing policies and timelines.

In the book: Ch. 02 Regulation and Compliance Landscape, Ch. 47b Configuration and Rules Distribution -- Feature Flags, Jurisdiction Rules, and the Propagation Model

Common pitfalls

- Buying a sub-licence from a reseller. The master and sub-licence model ended and old sub-licences expired in January 2025.
- Assuming a Curacao licence gets you into regulated Europe. It does not.
- Skipping substance. A Curacao entity with a nominee director and no office, staff or local records will not meet the LOK, and the tax relief depends on substance.
- Counting on the 2027 deferral of key person rules. Sources disagree on the exact relief, so plan to staff up.
- Letting domains and apps multiply outside the licence. Each one must be registered.
- Ignoring complaint deadlines. One week to acknowledge and four weeks to decide, with ADR at your cost.
- Quoting one fee number. Sources show EUR 47,450 or USD 55,000 a year for B2C depending on date and currency; use the CGA's current schedule.

Sources

1. Curacao Gaming Authority: online gaming regulation
   https://www.cga.cw/regulation/online-gaming
2. Legal 500: Curacao gambling law (generated 21 November 2026)
   https://www.legal500.com/guides/chapter/curacao-gambling-law/?export-pdf
3. Curacao Chronicle: CGA updated licence fee guidelines under LOK (v2.0)
   https://www.curacaochronicle.com/post/local/curacao-gaming-authority-issues-updated-license-fee-guidelines-under-lok-framework
4. Coincub: Curacao gaming licence 2026 (secondary source)
   https://coincub.com/blog/curacao-gaming-license/

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