Gibraltar

Online casino launch roadmap

Gambling Commissioner and Licensing Authority (HM Government of Gibraltar, Gambling Division)

A mature hub with very low gaming duty, now under a new Gambling Act that puts real substance in Gibraltar at the center of every application.

- Recommended path
- Optional, worth it
- Alternative route

LICENCE	TIME TO LAUNCH	GAMING TAX	LICENCE FEES	SETUP COST	LOCAL PRESENCE
B2C Gambling Operator's Licence (gaming) under the…	**6-9 months, including pre-licensing engagement…**	**General Gaming Duty of 0.15% of gross gaming…**	**GBP 30,000 application; annual fee GBP 50,000…**	**GBP 500K-1.5M including local office, staff, legal…**	**Business must be managed and controlled in or from…**

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

- Understand what the licence covers — 1.1
- Substance plan — 1.3
- Check the Gambling Act 2025 status — 1.2
- White label or B2B route — 1.4

STAGE 2 · Months 1-5 — Pre-licensing and application

- Pre-licensing and in-principle decision — 2.1
- Approved persons regime — 2.3
- Marketing entities in the group — 2.5
- Application fee — 2.2
- Company and funding structure — 2.4

STAGE 3 · Months 2-7 — Platform and suppliers

- Licensed supplier chain — 3.1
- RNG and game integrity — 3.3
- Security and logging — 3.5
- Technical standards and Codes — 3.2
- Hosting and data protection — 3.4

STAGE 4 · Months 3-8 — Player protection, AML and payments

- KYC and AML — 4.1
- Target-market gating — 4.3
- Disputes and chargebacks — 4.5
- Responsible gambling tools — 4.2
- Customer funds — 4.4

STAGE 5 · Months 5-8 — Certification and testing

- Independent testing — 5.1
- Disaster recovery rehearsal — 5.3
- Pre-launch compliance testing — 5.2

STAGE 6 · Months 8-10 — Go-live

- Licence issue and first fees — 6.1
- Target-market licences — 6.3
- Soft launch — 6.2
- Incident runbooks — 6.4

STAGE 7 · From launch — Ongoing obligations

- Quarterly duty payments — 7.1
- Change of control and approvals — 7.3
- Reporting and audit evidence — 7.2
- Appeals and enforcement — 7.4

Gibraltar: launch roadmap in detail

Gambling Commissioner and Licensing Authority (HM Government of Gibraltar, Gambling Division) · as of 2026-11

Licence	B2C Gambling Operator's Licence (gaming) under the Gambling Act 2025, in force 1 April 2026
Time to launch	6-9 months, including pre-licensing engagement and an in-principle decision (estimate; no official timeline found)
Gaming tax	General Gaming Duty of 0.15% of gross gaming profit, first GBP 100,000 exempt; bonuses and free spins not deductible
Licence fees	GBP 30,000 application; annual fee GBP 50,000 (under GBP 20M yield), GBP 100,000 (GBP 20M-300M), GBP 200,000 (over GBP 300M) per vertical
Setup cost	GBP 500K-1.5M including local office, staff, legal and audit (estimate, not a regulator figure)
Local presence	Business must be managed and controlled in or from Gibraltar; the Act requires real economic substance (staff, office, infrastructure)
Difficulty	Medium to high

1. Market and legal feasibility Weeks 0-6

1.1 Understand what the licence covers RECOMMENDED

A Gibraltar licence authorizes you to operate from Gibraltar. It does not authorize you to serve other countries. UK-facing play needs a UKGC licence, and UK Remote Gaming Duty (40% from April 2026) applies to UK customer profits whatever your base.

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

1.2 Check the Gambling Act 2025 status RECOMMENDED

The Gambling Act 2025 commenced on 1 April 2026 (sections 55 to 77 excluded from that notice; we could not confirm what they cover), replacing the 2005 Act. The transition for licensing and fees ran from 1 April to 1 October 2026, and existing licensees had to reapply. A Gambling (Amendment) Bill 2026 was introduced; its status was not verified.

In the book: Ch. 06 Licensing Guide, Ch. 02 Regulation and Compliance Landscape

1.3 Substance plan RECOMMENDED

The Act expects staff, offices, infrastructure and local tax contribution in Gibraltar. Design headcount and decision-making location before you file, because the licensing bar is described as high and Maintaining Gibraltar's reputation is now a statutory objective.

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

1.4 White label or B2B route ALTERNATIVE

B2B licences (aggregator, platform supplier, direct content) are separate and B2B is exempt from gambling duty. Serving brands through an existing B2C licensee avoids the B2C application but adds partner dependence.

In the book: Ch. 47d Casino as a Service: White-Label Provisioning at the Press of a Button, Ch. 09 Legal Framework and Contracts, Ch. 10b Supplier Integration Control Plane

2. Pre-licensing and application Months 1-5

2.1 Pre-licensing and in-principle decision RECOMMENDED

Applications still involve engagement with the Gambling Division and an in-principle decision before the formal application, according to law-firm commentary. Use that stage to settle structure, key persons and the technical outline.

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

2.2 Application fee RECOMMENDED

The Duties and Licence Fees Regulations 2026 set GBP 30,000 for a new B2C gaming operator. The regulations say the fee is payable on submission, while one law firm describes two instalments of 50%; confirm the payment schedule with the Division. Fees are non-refundable.

In the book: Ch. 06 Licensing Guide, Ch. 36 Financial Operations

2.3 Approved persons regime RECOMMENDED

Senior decision-makers are vetted as regulated individuals. The fee is GBP 500 for a five-year approval and GBP 200 for a material change, and approvals attach to a role at a specific operator. A new function at the same operator needs a further approval.

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

2.4 Company and funding structure RECOMMENDED

Set up a Gibraltar company with the capital and ownership evidence the Authority expects. Holding entities that own overseas gambling companies may need authorization, so map the group before filing.

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

2.5 Marketing entities in the group OPTIONAL

B2C licensees can run group marketing under their licence. A separate Gibraltar B2B marketing company needs its own licence, with a presumption against grant, so keep marketing inside the B2C where possible.

In the book: Ch. 37 Marketing Technology and CRM Systems, Ch. 06 Licensing Guide

3. Platform and suppliers Months 2-7

3.1 Licensed supplier chain RECOMMENDED

Content reaches you through licensed aggregators, platform suppliers or direct integrations. Content providers supplying through an aggregation platform need Authority approval at GBP 1,000 each, paid before assessment.

In the book: Ch. 10b Supplier Integration Control Plane, Ch. 09 Legal Framework and Contracts

3.2 Technical standards and Codes RECOMMENDED

The Commissioner issues Codes of Practice for remote licence holders and the Act brings more digitized reporting for technical standards and safer gambling. Read the current codes before writing your controls spec.

In the book: Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 25b Regulatory Reporting and Evidence Export

3.3 RNG and game integrity RECOMMENDED

RNG and game math need testing by an accepted lab. Keep the certificates and version control in one register.

In the book: Ch. 17 Random Number Generation (RNG), Ch. 15 Casino Mathematics and Game Economy

3.4 Hosting and data protection RECOMMENDED

Gibraltar data protection follows the Gibraltar GDPR, which tracks UK GDPR. Plan the server location, backup region and retention early.

In the book: Ch. 27 Data Residency and Backup/Recovery, Ch. 34b Data Governance for iGaming Platforms

3.5 Security and logging RECOMMENDED

Admin MFA, vulnerability management and regulator-grade logs will appear in audits.

In the book: Ch. 24 Security and Compliance, Ch. 24b Wazuh SIEM for iGaming Compliance

4. Player protection, AML and payments Months 3-8

4.1 KYC and AML RECOMMENDED

Gibraltar's AML regime applies to gambling operators, with the Act adding more digitized AML reporting. Build documented risk assessments, a nominated officer and evidence storage.

In the book: Ch. 24d KYC Evidence Lifecycle, Ch. 19 Anti-Fraud System Deep Dive

4.2 Responsible gambling tools RECOMMENDED

Limits, self-exclusion, reality checks and behavior-based interaction are expected. Gibraltar has no national exclusion register that we could verify, so apply exclusions across all brands and add the target market's scheme (GAMSTOP for GB).

In the book: Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 26b Self-Exclusion Registries: From API to Audit Trail

4.3 Target-market gating RECOMMENDED

Use player location to apply the rules of each market you serve and to block markets you do not hold licences for.

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

4.4 Customer funds RECOMMENDED

Holding or managing customer funds outside a licensed credit institution is itself a licensable support service at GBP 50,000 a year, so use a bank or a licensed provider.

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

4.5 Disputes and chargebacks RECOMMENDED

Define complaint handling and escalation. The Commissioner advises on complaints about licensed companies.

In the book: Ch. 33d Disputes, Chargebacks, and Player Support, Ch. 26 Responsible Gaming and Player Protection Systems

5. Certification and testing Months 5-8

5.1 Independent testing RECOMMENDED

Games, RNG and platform need independent testing and a documented control system. Book lab slots early.

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

5.2 Pre-launch compliance testing RECOMMENDED

Test limits, exclusion, KYC gates and reporting exports on every channel including live dealer.

In the book: Ch. 32 Testing and QA in Gambling, Ch. 25b Regulatory Reporting and Evidence Export

5.3 Disaster recovery rehearsal OPTIONAL

Rehearse failover so the documented plan is credible. The book uses RTO under 4 hours and RPO under 1 hour as design targets, not Gibraltar rules.

In the book: Ch. 27 Data Residency and Backup/Recovery, Ch. 35 Incident Management

6. Go-live Months 8-10

6.1 Licence issue and first fees RECOMMENDED

Annual fees are due 1 April and payable by 30 April, apportioned from the start of the calendar quarter if granted mid-year. Check licence conditions against your plan before real-money play.

In the book: Ch. 07 Casino Implementation Planning and Timeline, Ch. 36 Financial Operations

6.2 Soft launch RECOMMENDED

Start with a limited cohort and watch protection triggers and payment declines.

In the book: Ch. 07 Casino Implementation Planning and Timeline, Ch. 33 Operational Playbooks

6.3 Target-market licences RECOMMENDED

Add the licences and registrations each target country requires. A Gibraltar licence does not replace them.

In the book: Ch. 06 Licensing Guide, Ch. 40 Case Study -- Launching in a New Regulated Market

6.4 Incident runbooks RECOMMENDED

Name who notifies the Division and when for outages and breaches.

In the book: Ch. 35 Incident Management, Ch. 35b Cash-Flow Integrity Incident Response

7. Ongoing obligations From launch

7.1 Quarterly duty payments RECOMMENDED

Gaming duty is paid in instalments due 1 April, 1 July, 1 October and 1 January, each by the end of that month. Gross gaming profit does not allow deducting free spins or bonuses, but relevant chargebacks may be deducted. The regulations also contain an anti-avoidance rule.

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

7.2 Reporting and audit evidence RECOMMENDED

Build exports once from the ledger and player-protection systems. The Act expands enforcement powers, including fines and inspections.

In the book: Ch. 25b Regulatory Reporting and Evidence Export, Ch. 34 Data and Analytics

7.3 Change of control and approvals RECOMMENDED

A change of control notice costs a base fee of GBP 3,000 rising to GBP 30,000 depending on complexity under the 2026 regulations (law-firm commentary quotes GBP 7,500; use the regulations). Plan investor events accordingly.

In the book: Ch. 09 Legal Framework and Contracts, Ch. 25b Regulatory Reporting and Evidence Export

7.4 Appeals and enforcement OPTIONAL

A Gambling Appeals Tribunal hears appeals against Commissioner decisions such as refusals and suspensions. Know the route before you need it.

In the book: Ch. 09 Legal Framework and Contracts, Ch. 35 Incident Management

Common pitfalls

- Treating the 0.15% duty as the full cost for UK customers. UK Remote Gaming Duty of 40% applies to UK customer profits regardless of where you are licensed.
- Setting up a letterbox. The Act requires real staff, offices and infrastructure in Gibraltar.
- Using the 2005 Act fee schedule from old guides. The 2026 regulations revoked the 2018 fee regulations.
- Letting a Gibraltar B2B marketing company handle affiliates without a licence. It carries a presumption against grant.
- Hiring a senior person without an approval and assuming it follows them from another operator. Approvals are per role per operator.
- Deducting bonuses and free spins from gross gaming profit when computing duty. The regulations do not allow it.
- Missing the quarterly duty dates or the 30 April annual fee deadline.
- Expecting a Gibraltar licence to cover EU or UK markets without local licences.

Sources

1. Gambling (Duties and Licence Fees) Regulations 2026, LN.2026/065
   https://www.gibraltarlaws.gov.gi/uploads/legislations/gambling/2026s065/2026s065.pdf
2. Gambling (Non-Remote Licence Fees and Duties) Regulations 2026, LN.2026/088
   https://www.gibraltarlaws.gov.gi/uploads/legislations/gambling/2026s088/2026s088.pdf
3. ISOLAS: New Gambling Act, key changes (via Legal 500)
   https://www.legal500.com/intelligence/gibraltar/media-telecoms-it-entertainment/new-gambling-act-%E2%80%93-key-changes
4. HM Government of Gibraltar: remote gambling
   https://www.gibraltar.gov.gi/new/remote-gambling
5. iGaming Business: Gibraltar new Gambling Act 2025, questions unanswered
   https://igamingbusiness.com/legal-compliance/gibraltar-new-gambling-act-2025-questions-unanswered/
6. GOV.UK: gambling duty changes (UK Remote Gaming Duty)
   https://www.gov.uk/government/publications/changes-to-gambling-duties/gambling-duty-changes

Companion to *The Backend of Luck*. Regulations change; check every figure with the regulator and local counsel before you rely on it. This is engineering guidance, not legal advice.