Isle of Man

Online casino launch roadmap

Gambling Supervision Commission (GSC)

A small, fast, low-duty licence under the Online Gambling Regulation Act 2001, with a firm local-presence rule and a regulator that is tightening enforcement.

- Recommended path
- Optional, worth it
- Alternative route

LICENCE	TIME TO LAUNCH	GAMING TAX	LICENCE FEES	SETUP COST	LOCAL PRESENCE
Full Online Gambling Licence under the Online…	**4-8 months; about 10-12 weeks of processing after…**	**Gambling duty on GGY: 1.5% up to GBP 20M, 0.5% from…**	**GBP 5,250 application; GBP 36,750 full licence on…**	**GBP 300K-900K including local directors, office…**	**Manx company, at least two local individual directors…**

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

- What the licence does and does not give — 1.1
- Know the regulatory direction — 1.3
- Check ownership risk appetite — 1.2
- Software supplier or sub-licence route — 1.4

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

- Manx company and local directors — 2.1
- Application and vetting forms — 2.3
- Network services licence — 2.5
- Designated Official or Ops Manager — 2.2
- Board hearing — 2.4

STAGE 3 · Months 2-6 — Platform and suppliers

- IoM-hosted player registration — 3.1
- RNG and game testing — 3.3
- Data protection — 3.5
- Licensed or registered suppliers — 3.2
- Security baseline — 3.4

STAGE 4 · Months 3-7 — AML, player protection and payments

- Gambling AML/CFT Code 2019 — 4.1
- Exclude minors and listed countries — 4.3
- Funds, accounts and virtual assets — 4.5
- KYC and source of funds — 4.2
- Social responsibility contributions — 4.4

STAGE 5 · Months 5-8 — Testing and go-live

- Pre-launch compliance testing — 5.1
- Soft launch — 5.3
- Independent audits — 5.2
- Target-market registrations — 5.4

STAGE 6 · From launch — Ongoing obligations

- Gambling duty returns — 6.1
- Enforcement readiness — 6.3
- Annual fee and licence renewal — 6.2
- Incident reporting — 6.4

Isle of Man: launch roadmap in detail

Gambling Supervision Commission (GSC) · as of 2026-11

Licence	Full Online Gambling Licence under the Online Gambling Regulation Act 2001 (OGRA); initial term five years
Time to launch	4-8 months; about 10-12 weeks of processing after acceptance and a formal hearing at about 12 weeks (Appleby 2026 guide)
Gaming tax	Gambling duty on GGY: 1.5% up to GBP 20M, 0.5% from GBP 20M to GBP 40M, 0.1% above GBP 40M (single source; confirm with the Treasury)
Licence fees	GBP 5,250 application; GBP 36,750 full licence on approval and annually; network services licence GBP 52,500
Setup cost	GBP 300K-900K including local directors, office, legal and audit (estimate, not a regulator figure)
Local presence	Manx company, at least two local individual directors, and a resident Designated Official or Operations Manager
Difficulty	Medium

1. Market and legal feasibility Weeks 0-6

1.1 What the licence does and does not give RECOMMENDED

An OGRA licence lets you operate from the Island. It does not authorize play in other countries, so a UK-facing launch needs a UKGC licence and UK Remote Gaming Duty of 40% applies to UK customers. Pick target markets before you pick the licence.

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

1.2 Check ownership risk appetite RECOMMENDED

A May 2025 National Risk Appetite Statement sets limited appetite for eGaming businesses with ownership or control in East or Southeast Asia. Expect extra scrutiny if your ownership chain touches those regions.

In the book: Ch. 06 Licensing Guide, Ch. 24d KYC Evidence Lifecycle

1.3 Know the regulatory direction RECOMMENDED

The GSC proposed changes across seven gambling acts, with a draft bill read in the House of Keys on 28 October 2025, adding wider inspection powers and civil penalties. Final enactment was not confirmed. A MONEYVAL visit was expected in autumn 2026.

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

1.4 Software supplier or sub-licence route ALTERNATIVE

Operators working only with one IoM-licensed technology provider can apply for a sub-licence at GBP 5,250, and suppliers can use a software supplier licence at GBP 36,750. These routes cut cost but tie you to the host.

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

2. Corporate structure and licence application Months 1-4

2.1 Manx company and local directors RECOMMENDED

Incorporate a Manx company and appoint at least two local directors who are individuals. Hold gambling and trading accounts at an Isle of Man bank unless the GSC agrees otherwise.

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

2.2 Designated Official or Ops Manager RECOMMENDED

Appoint at least one resident Designated Official, or an Operations Manager if the person cannot reside on the Island. This is the person the GSC will deal with day to day, so hire for competence, not just residency.

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

2.3 Application and vetting forms RECOMMENDED

File the application form, vetting forms, supporting paperwork and the GBP 5,250 fee with the inspectorate. Due diligence on principals and structure is thorough but less invasive than the UK or the US states.

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

2.4 Board hearing RECOMMENDED

The formal hearing usually follows about 12 weeks after acceptance, with notice of the outcome soon after. The full licence fee is payable on approval by the Board.

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

2.5 Network services licence OPTIONAL

Needed if players registered with a non-IoM operator will use your IoM server without re-registering, at GBP 52,500 a year. Otherwise register players on Isle of Man servers.

In the book: Ch. 10 Complete Platform Architecture, Ch. 47d Casino as a Service: White-Label Provisioning at the Press of a Button

3. Platform and suppliers Months 2-6

3.1 IoM-hosted player registration RECOMMENDED

Player registration must sit on IoM servers unless a network services licence applies. Design hosting and data flows around that rule.

In the book: Ch. 27 Data Residency and Backup/Recovery, Ch. 10 Complete Platform Architecture

3.2 Licensed or registered suppliers RECOMMENDED

Under the 2019 regulations, suppliers can list products on a GSC register so licensees can use them without separate permission. Prefer registered suppliers and keep contracts that give you audit access.

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

3.3 RNG and game testing RECOMMENDED

Use games and RNG tested by an accepted lab. Keep certificates and versions in a register tied to what you deploy.

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

3.4 Security baseline RECOMMENDED

Admin MFA, vulnerability management and logging will appear in inspections. A SIEM makes evidence requests simple.

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

3.5 Data protection RECOMMENDED

Isle of Man data protection law follows GDPR-style rules. Decide backup regions and retention before architecture freeze.

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

4. AML, player protection and payments Months 3-7

4.1 Gambling AML/CFT Code 2019 RECOMMENDED

In force since 1 June 2019, the Code requires risk assessment, customer due diligence, record keeping and staff training. Suspicious transactions go to the Financial Intelligence Unit, and the GSC can impose civil penalties for breaches.

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

4.2 KYC and source of funds RECOMMENDED

Build KYC as a decision flow with stored evidence and retries. Document the triggers for enhanced due diligence from your own risk assessment.

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

4.3 Exclude minors and listed countries RECOMMENDED

Operators must keep out under-18s and players in prescribed jurisdictions, so you need reliable age checks and location gating. The GSC maintains the jurisdiction list, so wire it into your gateway as a config.

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

4.4 Social responsibility contributions RECOMMENDED

Operators contribute to bodies researching or treating gambling harm and give evidence to the GSC each year. Provide limits, self-exclusion and interaction tools, and add the target market's own scheme.

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

4.5 Funds, accounts and virtual assets RECOMMENDED

Deposits may be money or value, including virtual assets, controlled through GSC policy, guidance and licence conditions. Agree the policy before you add crypto rails.

In the book: Ch. 36 Financial Operations, Ch. 16 Cryptocurrency and DeFi Integration

5. Testing and go-live Months 5-8

5.1 Pre-launch compliance testing RECOMMENDED

Test KYC gates, exclusion, limits and reporting exports on every channel and game type. Capture evidence as you test.

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

5.2 Independent audits RECOMMENDED

Keep security and technical documentation current and map controls to a recognized framework to avoid redoing evidence.

In the book: Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 24 Security and Compliance

5.3 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

5.4 Target-market registrations RECOMMENDED

Add local licences for each country you serve. An IoM licence will not cover them.

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

6. Ongoing obligations From launch

6.1 Gambling duty returns RECOMMENDED

Duty on GGY is levied by the Isle of Man Treasury, separate from licence fees. The tiered rates above come from one law firm guide, so confirm the schedule and the filing cadence with the Treasury before you model it.

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

6.2 Annual fee and licence renewal RECOMMENDED

The full licence fee recurs annually and the licence renews in five-year periods. Keep a compliance calendar for both.

In the book: Ch. 36 Financial Operations, Ch. 25b Regulatory Reporting and Evidence Export

6.3 Enforcement readiness RECOMMENDED

The June 2024 enforcement policy lets the GSC suspend or terminate licences and impose civil penalties or public disclosure, and activity has increased. Keep policies and logs ready for inspection.

In the book: Ch. 25b Regulatory Reporting and Evidence Export, Ch. 35 Incident Management

6.4 Incident reporting RECOMMENDED

Write runbooks that name who informs the GSC and when for outages, breaches and cash flow incidents.

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

Common pitfalls

- Quoting old fees. The October 2025 GSC schedule shows GBP 5,250 to apply and GBP 36,750 a year, not the older GBP 35,000 figure.
- Appointing local directors who are companies. They must be individuals, and there must be at least two.

- Ignoring the Designated Official or Operations Manager role until the hearing.
- Registering players outside the Island without a network services licence.
- Assuming the draft legal reforms are in force. Their enactment was not confirmed.
- Relying on a single guide for duty rates without checking with the Treasury.
- Having ownership links to East or Southeast Asia and not preparing for the extra scrutiny.
- Treating the IoM licence as market access. It is not, and UK-facing play needs a UKGC licence.

Sources

1. GSC: Online Gambling Licence Fees (October 2025)
   https://www.isleofmangsc.com/media/mxhgu2pg/ogra-licence-fees-v1025.pdf
2. Appleby: Guide to Gambling Law in the Isle of Man 2026
   https://www.applebyglobal.com/publications/guide-to-gambling-law-in-the-isle-of-man-2026/
3. GSC: update on draft legislative reforms, 23 January 2026
   https://www.isleofmangsc.com/gambling/gsc-gambling-news/23-january-2026-update-on-the-gsc-draft-legislative-reforms/
4. 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.