Philippines

Online casino launch roadmap

Philippine Amusement and Gaming Corporation (PAGCOR)

Offshore licensing is over; the only legal online route is domestic e-games under PAGCOR, and new operator accreditations have been frozen since March 2024, so most newcomers will come in through an existing licensee.

- Recommended path
- Optional, worth it
- Alternative route

LICENCE	TIME TO LAUNCH	GAMING TAX	SETUP COST	LOCAL PRESENCE	DIFFICULTY
Domestic e-games: Gaming System Administrator (GSA)…	**New GSA applications are frozen, so there is no…**	**30% of gross gaming revenue for e-gaming operators and…**	**Book estimate USD 200K-350K for the generic case; the…**	**Philippine entity or accredited local…**	**High, and changing fast**

STAGE 1 · Weeks 0-8 — Market and legal feasibility

- Understand what is banned — 1.1
- Know the legal domestic route — 1.2
- Check the freeze — 1.3
- Model 30% GGR plus the MGF — 1.4
- Other regimes — 1.5

STAGE 2 · Months 1-4 — Entry route and entity

- Operate under an accredited licensee — 2.1
- Philippine entity and SEC registration — 2.2
- Probity and ownership disclosure — 2.3
- Unified Gaming License — 2.4

STAGE 3 · Months 2-6 — B2B accreditation and suppliers

- Gaming Affiliate and SSP accreditation — 3.1
- Distributor option for content studios — 3.2
- Fees and deposits — 3.3
- Supplier control plane — 3.4

STAGE 4 · Months 3-7 — Platform and hosting

- Hosting location — 4.1
- Back-office access for PAGCOR — 4.2
- RNG and game math — 4.3
- Data protection — 4.4

STAGE 5 · Months 4-8 — Player compliance controls

- KYC and age 21 — 5.1
- PAGCOR exclusion programme — 5.2
- RG code and RTP transparency — 5.3
- AML supervision — 5.4
- Promotions and cashback caps — 5.5

STAGE 6 · Months 4-8 — Payments

- BSP-supervised payment providers — 6.1
- GGR share and MGF accounting — 6.2
- Player fund flows — 6.3

STAGE 7 · Months 6-9 — Certification and approval

- Accredited test labs — 7.1
- Technical and security review — 7.2
- Brand registration and approvals — 7.3

STAGE 8 · Months 8-12 and after — Go-live and ongoing obligations

- Launch with PAGCOR sign-off — 8.1
- Monthly reporting and fee payment — 8.2
- Watch regulatory memos — 8.3
- Incident handling — 8.4

Philippines: launch roadmap in detail

Philippine Amusement and Gaming Corporation (PAGCOR) · as of 2026-11

Licence	Domestic e-games: Gaming System Administrator (GSA) accreditation or Gaming Venue Operator (GVO) licence from PAGCOR; B2B suppliers need Gaming Affiliate or Support Service Provider accreditation
Time to launch	New GSA applications are frozen, so there is no standard timeline. Entering through an existing licensee is a partner negotiation plus accreditation, my estimate 4-9 months; the book's generic 6-9 months assumes an open window
Gaming tax	30% of gross gaming revenue for e-gaming operators and 25% for online gaming linked to integrated resorts (unchanged since January 1, 2025), plus a monthly Minimum Guaranteed Fee for GSAs from April 1, 2026
Setup cost	Book estimate USD 200K-350K for the generic case; the MGF alone is PHP 10.5M a month for a GSA with e-casino from October 1, 2026 (roughly USD 185K at the exchange rate used by the press)
Local presence	Philippine entity or accredited local representative required for foreign B2B providers; PAGCOR needs real-time back-office access
Difficulty	High, and changing fast

1. Market and legal feasibility Weeks 0-8

1.1 Understand what is banned RECOMMENDED

Executive Order 74 (November 2024) banned offshore gaming operations aimed at players outside the Philippines, and PAGCOR cancelled all Internet Gaming Licensee licences and accreditations effective December 15, 2024. The Anti-POGO Act of 2025 makes the ban permanent according to the Chambers practice guide, and a 2026 inter-agency procedure document was signed for enforcement. Anyone selling a POGO or IGL licence is a red flag.

In the book: Ch. 02 Regulation and Compliance Landscape, Ch. 29d Datacenter Infrastructure for Regulated Gaming -- Asia-Pacific and Middle East

1.2 Know the legal domestic route RECOMMENDED

PAGCOR licenses domestic electronic gaming for players in the Philippines: licensed land-based casinos and e-gaming sites can extend online through approved remote gaming systems, run by accredited Gaming System Administrators and Gaming Venue Operators. Players must be 21 or older. Read PAGCOR's current frameworks, since several changed in 2025 and 2026.

In the book: Ch. 02 Regulation and Compliance Landscape, Ch. 06 Licensing Guide, Ch. 29d Datacenter Infrastructure for Regulated Gaming -- Asia-Pacific and Middle East

1.3 Check the freeze RECOMMENDED

PAGCOR has held a moratorium on new GSA applications since March 1, 2024 and in August 2026 said it would keep it while the industry consolidates. Licensees fell from 74 to 48 as inactive ones were removed. Applications filed before the cutoff were still being processed. Do not plan a launch that depends on a new accreditation without written confirmation from PAGCOR.

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

1.4 Model 30% GGR plus the MGF RECOMMENDED

From April 1, 2026 GSAs pay a monthly minimum guaranteed fee. In the second tranche from October 1, 2026, a GSA with e-casino games and at least PHP 35M monthly GGR pays PHP 10.5M, and one without e-casino at PHP 20M GGR pays PHP 4M. If your GGR is below the threshold you still pay the minimum.

In the book: Ch. 15 Casino Mathematics and Game Economy, Ch. 30 FinOps Deep Dive

1.5 Other regimes ALTERNATIVE

Special economic zones (CEZA, APECO, AFAB) and PCSO run separate gaming regimes, but they do not give you a path to offer online casino to the Philippine public. Treat them as out of scope unless counsel says otherwise.

In the book: Ch. 02 Regulation and Compliance Landscape

2. Entry route and entity Months 1-4

2.1 Operate under an accredited licensee RECOMMENDED

With new GSA accreditations frozen, the realistic path is to supply or white-label for an existing GSA or GVO, or to take a brand under its registered brands and sub-brands list. PAGCOR publishes the accredited GSA and brand lists, so verify the partner there and not from its own claims.

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

2.2 Philippine entity and SEC registration RECOMMENDED

Foreign providers must establish a local presence or appoint an accredited representative, with SEC registration, tax compliance and PAGCOR accreditation. Set up the entity and tax registration early, because PAGCOR checks them during probity review.

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

2.3 Probity and ownership disclosure RECOMMENDED

PAGCOR runs probity checks on owners and officers, and in July 2026 it ordered stricter disclosure of foreign gaming ties. Prepare a clear ownership chart and clean sources of funds.

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

2.4 Unified Gaming License OPTIONAL

PAGCOR approved a Unified Gaming License in July 2026 as an additional or alternative option for gaming venue operations. I only found press coverage, not the framework text, so read PAGCOR's own memo before relying on it.

In the book: Ch. 06 Licensing Guide

3. B2B accreditation and suppliers Months 2-6

3.1 Gaming Affiliate and SSP accreditation RECOMMENDED

PAGCOR's accreditation framework for Gaming Affiliates and Support Service Providers took effect October 2, 2025. It covers game content providers, aggregators, payment channels and e-wallets, KYC and membership systems, customer service providers and test labs. Press reports gave compliance deadlines of March 31 and July 31, 2026, after which only accredited providers can work with licensees. Confirm the current status.

In the book: Ch. 10b Supplier Integration Control Plane, Ch. 06 Licensing Guide

3.2 Distributor option for content studios ALTERNATIVE

A game provider that does not get its own accreditation can appoint an accredited provider or GSA as its exclusive distributor in the Philippines, with each distributor limited to five distributorships. This is the fast path for studios.

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

3.3 Fees and deposits RECOMMENDED

Accreditation needs a nonrefundable application or renewal fee and a performance cash deposit. The amounts are in PAGCOR's memos and have changed, so get the current schedule from the regulator. A PHP 50,000 fee was added in 2026 for venue area changes.

In the book: Ch. 06 Licensing Guide

3.4 Supplier control plane RECOMMENDED

Track accreditation status, expiry and approved game builds per supplier so a lapsed accreditation does not leave you with unapproved content in the lobby.

In the book: Ch. 10b Supplier Integration Control Plane

4. Platform and hosting Months 3-7

4.1 Hosting location RECOMMENDED

Book chapter 29d treats PAGCOR-approved infrastructure in the Philippines as the planning baseline, with Metro Manila facilities and a secondary site in-country. I could not find a published rule text, so get the hosting conditions in your approval letter in writing before procurement.

In the book: Ch. 29d Datacenter Infrastructure for Regulated Gaming -- Asia-Pacific and Middle East, Ch. 27 Data Residency and Backup/Recovery

4.2 Back-office access for PAGCOR RECOMMENDED

Remote gaming operators must give PAGCOR's Compliance Monitoring and Enforcement Department real-time back-office access. Build a read-only regulator console and audit trail.

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

4.3 RNG and game math RECOMMENDED

Games need RNG certification and RTP disclosure by an accredited independent testing laboratory. Keep game configuration under change control.

In the book: Ch. 17 Random Number Generation (RNG), Ch. 15 Casino Mathematics and Game Economy, Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security

4.4 Data protection RECOMMENDED

Personal data falls under the Data Privacy Act and National Privacy Commission rules as well as PAGCOR's requirements. Map data flows, retention and cross-border transfers.

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

5. Player compliance controls Months 4-8

5.1 KYC and age 21 RECOMMENDED

Block persons under 21 and prohibited categories such as government employees, military and police, and casino staff. Verify identity with Philippine IDs and keep the evidence retrievable.

In the book: Ch. 24d KYC Evidence Lifecycle, Ch. 24 Security and Compliance

5.2 PAGCOR exclusion programme RECOMMENDED

Players can self-exclude or be excluded by family through PAGCOR's portal or on site. e-Gaming systems must block registration and access by anyone on the database, so integrate the list and test it.

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

5.3 RG code and RTP transparency RECOMMENDED

PAGCOR's Revised Code of Practice for Responsible Gaming sets minimums for licensed and accredited entities. Show RTP, offer limits and tools, and follow the advertising limits.

In the book: Ch. 26 Responsible Gaming and Player Protection Systems

5.4 AML supervision RECOMMENDED

Casinos, including online ones, are covered persons under Philippine anti-money laundering law and PAGCOR has an AML supervision unit. Build transaction monitoring, covered and suspicious transaction reports to the AMLC, and staff training.

In the book: Ch. 19 Anti-Fraud System Deep Dive, Ch. 24 Security and Compliance, Ch. 33 Operational Playbooks

5.5 Promotions and cashback caps RECOMMENDED

A May 7, 2026 memorandum caps cash rebates at 1.5% of turnover for slots, e-bingo, numeric games and sports betting, and net-loss cashback at 15% for all electronic games. Programs need prior PAGCOR approval on EG Form No. 28 and cost must be booked as marketing, not deducted from GGR.

In the book: Ch. 37 Marketing Technology and CRM Systems, Ch. 36 Financial Operations

6. Payments Months 4-8

6.1 BSP-supervised payment providers RECOMMENDED

Payment channels and e-wallets need PAGCOR accreditation as support service providers. Under May 2026 amendments, banks and e-money issuers supervised by the Bangko Sentral ng Pilipinas can use their BSP licence and fit-and-proper proof in place of some probity steps, and follow AMLC rules.

In the book: Ch. 36 Financial Operations, Ch. 33d Disputes, Chargebacks, and Player Support

6.2 GGR share and MGF accounting RECOMMENDED

Compute GGR exactly as PAGCOR defines it, with cashback excluded as a deduction, and reconcile to the ledger monthly. Cash planning needs to cover the MGF in low months.

In the book: Ch. 36b The Financial Truth Layer -- Ledger, Treasury, and Reconciliation, Ch. 30 FinOps Deep Dive

6.3 Player fund flows RECOMMENDED

Keep deposits and withdrawals traceable to verified accounts, with limits and holds based on risk. Crypto is not a planning assumption here.

In the book: Ch. 36 Financial Operations, Ch. 19 Anti-Fraud System Deep Dive

7. Certification and approval Months 6-9

7.1 Accredited test labs RECOMMENDED

PAGCOR lists accredited independent testing laboratories. Use one from that list, and ask which standards (such as GLI-19) it applies to your system.

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

7.2 Technical and security review RECOMMENDED

Prepare architecture documents, access controls, logging and backup evidence. Run penetration tests before submission.

In the book: Ch. 24 Security and Compliance, Ch. 23 DevSecOps for iGaming

7.3 Brand registration and approvals RECOMMENDED

Each brand and sub-brand must be registered under a GSA. Check that the website, domain and apps match what PAGCOR registered.

In the book: Ch. 47 Platform Onboarding: From Contract to First Real-Money Bet, Ch. 06 Licensing Guide

8. Go-live and ongoing obligations Months 8-12 and after

8.1 Launch with PAGCOR sign-off RECOMMENDED

Do not open registration until the accreditation, brand registration and lab certificates are in hand. Prepare support and RG teams.

In the book: Ch. 07 Casino Implementation Planning and Timeline, Ch. 08 Team Structure and Operations, Ch. 33 Operational Playbooks

8.2 Monthly reporting and fee payment RECOMMENDED

Pay the GGR share and MGF on schedule and file the required reports. Expect PAGCOR to remove inactive licensees.

In the book: Ch. 25b Regulatory Reporting and Evidence Export, Ch. 36b The Financial Truth Layer -- Ledger, Treasury, and Reconciliation

8.3 Watch regulatory memos RECOMMENDED

PAGCOR changed fees, promotions, B2B and payment rules several times in 2025 and 2026. Assign someone to track memos and update controls.

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

8.4 Incident handling RECOMMENDED

Keep an incident playbook with regulator contacts and notice timelines.

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

Common pitfalls

- Buying a POGO or Internet Gaming Licence. PAGCOR says all were cancelled on December 15, 2024, and anyone claiming one is likely fraudulent.
- Planning around a new GSA accreditation while the freeze is in force.
- Treating a partner's claim of being licensed as proof. Check the accredited GSA and brand lists on PAGCOR's site.
- Forgetting the MGF. It is owed even when GGR is below the threshold.
- Booking cashback as a loss deduction. PAGCOR's May 2026 memo requires it to be recorded as marketing expense.
- Using a foreign B2B supplier without accreditation or an accredited distributor.
- Relying on press summaries. Several 2026 rules were seen only in news coverage and need to be read in PAGCOR's own memos.

Sources

1. PAGCOR offshore gaming notice (cancellation of IGL licences)
   https://www.pagcor.ph/offshore-gaming.php
2. Executive Order No. 74, 2024
   https://lawphil.net/executive/execord/eo2024/eo_74_2024.html
3. Chambers Gaming Law 2025, Philippines
   https://chambers.com/practice-guides/guides/gaming-law-2025/philippines/law-and-practice

4. Chambers: PAGCOR rules on accreditation of gaming affiliates and support providers
   https://chambers.com/articles/pagcor-issues-rules-on-accreditation-of-gaming-affiliates-and-support-providers-under-new-regime
5. Asia Gaming Brief: PAGCOR keeps e-gaming licence freeze (Aug 2026)
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6. Asia Gaming Brief: PAGCOR caps cashback and rebates (May 2026)
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7. Asia Gaming Brief: PAGCOR revises rules for affiliates and payment providers (May 2026)
   https://agbrief.com/news/philippines/31/05/2026/pagcor-revises-e-gaming-rules-for-affiliates-payment-providers/
8. Philippine Star: Minimum guaranteed fee for e-gambling operators (Dec 2025)
   https://www.philstar.com/headlines/2025/12/29/2497443/e-gambling-operators-must-pay-minimum-guaranteed-fee

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