Identomat

COMPLIANCE GUIDE

iGaming & Gambling Compliance in Armenia

COUNTRY Armenia

INDUSTRY iGaming & Gambling

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KEY REGULATORS Ministry of Economy · State Revenue Committee · Financial Monitoring Center

Key takeaways

- Online casino games and online sports betting are legal in Armenia, but only for Armenian companies holding a licence from the Ministry of Economy; online operators also need a separate "right to accept bets".
- Players must be 21 or older, and an online casino operator must identify and register every player before any play is possible, not just above a spending threshold.
- Online accounts can be funded only from the player's own bank account or card (cards issued abroad to non-citizens are outside this rule); since April 2026 operators confirm ownership, with the player's consent, through a payment institution.
- Since 19 July 2026 every website page and app screen must carry a self-exclusion button that stops play within one minute, and public officials and civil servants may not gamble.
- A new gambling law with a state-appointed monitoring operator takes over on 8 February 2027; existing licences then have six months to be brought into line.

Armenia's market is open to licensed online operators and closed to everyone else: websites of operators without an Armenian licence are blocked by internet providers, and land-based casinos and slot halls are confined to a short list of resort towns, Zvartnots airport and large approved investment projects (betting shops may also open in regional centres and Yerevan's districts).

The Ministry of Economy licenses operators and sets policy, the State Revenue Committee supervises them (including for anti-money laundering purposes), and the Central Bank of Armenia's Financial Monitoring Center receives anti-money laundering reports. Online casinos and e-gaming platforms account for almost 99% of the Armenian gaming sector.

The biggest obstacle for a new entrant is timing: the rules change on 8 February 2027, when a new law brings certification of gaming products and their connection to a central monitoring system, so an operator entering now must build for both regimes.

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1 Who regulates this sector

Regulator	Remit	Level	Official site
Ministry of Economy	Gambling policy; licensing of casinos, games of chance, internet games of chance and lotteries; approval of the list of websites to be blocked (until 8 February 2027)	National	economy.gov.am
State Revenue Committee (SRC)	Supervisory body under the gambling laws and AML supervisor of the gambling sector: inspections, fines, detection of unlicensed sites, operator contract and, from 2027, the blocking list	National	src.am
Central Bank of Armenia, Financial Monitoring Center (FMC)	Financial intelligence unit: suspicious and threshold reports, AML rules for reporting entities	National	cba.am
Gambling regulation operator	From 2027: monitoring centre, product certification, operating certificates, restricted-persons data	National (private company under contract)	Government Decision 1155-A

The Public Services Regulatory Commission forwards approved blocking lists to internet service providers, which carry them out; the Personal Data Protection Agency of the

Ministry of Justice, acting independently, enforces the data protection law (Article 24 of the Law on Protection of Personal Data).

2 Licensing and authorisation

The **Law on Gambling, Internet Gambling Games and Casinos** (ՀՕ-1-Ն of 13 December 2003, «Շահումով խաղերի, ինտերնետ շահումով խաղերի և խաղատների մասին») `In force` applies until the new regime starts. Its successor, the **Law on Regulation of Gambling Activities** (ՀՕ-263-Ն of 12 June 2024, «Խաղային գործունեության կարգավորման մասին») `Adopted, applies from 8 Feb 2027`, entered into force on 1 July 2024 but its substantive provisions apply only from the day after six months have passed since the regulation operator was designated (Article 58(4)). The Government designated that operator on 6 August 2026, and the State Revenue Committee has announced that the new law applies from 8 February 2027, when the old law, the Law on Lotteries and Government Decision 411-N lapse (Government Decision 332-N).

Online operators

Only commercial companies registered in Armenia may organise internet games of chance, and only on the basis of a licence from the authorised body plus a right to accept bets, granted under a Government procedure on payment of a state duty (Article 4). The authorised body has been the Ministry of Economy since 4 September 2025 (Prime Minister Decision 778-L). Online play may be offered only through the website address named in the operator's approved rules (Article 6(2.1)). Significant shareholders, their beneficial owners and managers (including the AML compliance officer) must meet fit-and-proper requirements; a person must clear the authorised body's check before acquiring a significant participation, and a manager within three months of appointment (Articles 4.1 and 4.3).

Item	Internet games of chance	Source
Decision period	23 working days from a complete application, unless a law sets another period	Law on Licensing, Article 26(2)
Licence term	Indefinite	Law on Licensing, Article 26(3)
Annual licence duty	600,000 times the AMD 1,000 base duty (AMD 600 million)	Law on State Duty, Article 8 and Article 19, point 14.3

Right to accept bets	175,000 times the base duty times a coefficient (3.0) for each AMD 100 billion of bets (AMD 525 million)	Law on State Duty, Article 19.14

Sports betting

Until 8 February 2027, sports betting (totalisators, including internet totalisators) is licensed as a lottery under the **Law on Lotteries** (ՀՕ-3-Ն of 17 December 2003, «Վիճակախաղերի մասին»).

Rule	Sports betting (totalisators)	Source
Minimum age	21 (18 for other lotteries)	Law on Lotteries, Article 5
Betting halls	Identity documents checked for everyone entering	Law on Lotteries, Article 5
Funding	Armenian citizens' accounts funded only from their own bank accounts or cards; ownership checked with consent	Law on Lotteries, Article 5.2; Minister of Economy Order 1079-N of 16 April 2026
Betting shops	The four resort communities, each regional administrative centre and each district of Yerevan	Law on Lotteries, Article 5.2
Self-exclusion and barred players	Same rules as for casino games, in force 19 July 2026	Law on Lotteries, Articles 5.4 and 5.5 (Law HO-280-N)
AML reporting	Same deadlines as for casinos	Central Bank Board Decision 152-N

Land-based venues

Casinos, slot halls and venue-based internet gaming are limited to the communities of Tsaghkadzor, Jermuk, Sevan and Meghri, the area of Zvartnots airport, and investment programmes of more than AMD 40 billion approved by the Government, with one venue per programme (Article 6 of the Law on Gambling, Internet Gambling Games and Casinos).

Transition to the 2024 law

From the same date, persons without a gambling licence may not use terms such as "casino", "internet game of chance" or "bookmaker" in company names, trademarks,

website names or signs (Article 8(11) of the 2024 law). Licences issued under the old laws must be brought into line with the new law within six months after it starts to apply, or they are treated as terminated (Article 58(6)). The new law adds conformity certificates for gaming products, operating certificates for the individuals who carry out gaming operations, and a minimum programmed return to players of 90% for random-number-generator games (Articles 15 and 37 to 41).

3 AML, KYC and customer due diligence

Organisers of casinos, games of chance (including internet games of chance) and lotteries are reporting entities under Article 3 of the **Law on Combating Money Laundering and Terrorism Financing** (26 May 2008, «Փողերի լվացման և ահաբեկչության ֆինանսավորման դեմ պայքարի մասին»). Their reporting duties attach to purchases of chips or tickets, placing bets, paying winnings and related financial transactions of **AMD 1 million or more**, including linked transactions (Article 6(4)(2)).

Obligation	Rule	Source
Customer due diligence	For gambling operators, carried out in relation to the AMD 1 million transactions above, and whenever there are doubts about earlier identification data or suspicion of money laundering or terrorist financing. Verification may follow within seven days if risk is managed.	AML law, Article 16(1) to (3)
Players above AMD 1 million	Identification and verification from reliable, valid state-issued documents; a customer database recording, among other data, the sources, movement and volume of funds per 24-hour period	Government Decision 411-N of 20 April 2017
Suspicious transaction reports	Same working day through the FMC online system, or by 12:00 the next working day	Central Bank Board Decision 151-N of 12 October 2021, point 13
Threshold reports	Transactions of AMD 20 million or more, within three working days (18:00 on the third day)	AML law, Article 6(3)(2); Decision 151-N, points 11 and 12
Refresh of identification data	Identification and verification data updated at least once a year (other due diligence data on the operator's own schedule)	AML law, Article 17(2)

Record retention	At least five years after the relationship ends or the transaction is made	AML law, Article 22

A beneficial owner holds 20% or more of shares or capital, directly or indirectly, or otherwise controls the customer. The Central Bank's minimum-requirements regulation (Board Decision 279-N of 7 October 2014, which applies to gambling organisers under its point 1) lists a relationship without face-to-face contact as a high-risk criterion (point 27(6)); the operator may rate it medium instead only after a comprehensive, documented analysis concluding that the risks are effectively managed, submitted to the Central Bank (point 22.1). For such relationships it also requires the first payment to come from an account in the customer's name at a qualifying financial institution (point 40). The AML law requires policies and procedures for identifying and verifying customers without face-to-face contact (Article 18(3)), allows reliance on another institution's due diligence only if the operator keeps ultimate responsibility and obtains the data immediately (Article 16(8)), and obliges every person to freeze immediately the property of persons on United Nations Security Council or Central Bank terrorism and proliferation lists (Article 28).

4 Identity verification and onboarding

The Law on Gambling, Internet Gambling Games and Casinos requires an internet casino operator to identify and register each customer **before giving access to any internet game**, in order to exclude anyone under 21 (Article 6(2.1)). In a gaming hall the operator must bar under-21s from entry and identify, in a separate anteroom, every customer whose transactions exceed AMD 1 million (Article 6(2)).

No remote verification technology is prescribed. Identification rests on valid documents issued by a competent state authority (Decision 411-N, point 5), with the data set set out in that decision (point 8): name, citizenship, registration address, date and place of birth, identity document series, number and issue date, and residence. Document capture with face match and liveness is therefore permitted but not mandated; whatever method is used must establish those data from a state-issued document. When the relationship is established without face-to-face contact, Decision 411-N also requires the first payment to come from an account in the customer's name at a financial institution (point 7).

Funding is the second identity gate. Each online player has a special gaming account on the operator's server that can be topped up only from bank accounts or cards belonging to that player; the rule does not extend to accounts and cards of non-citizens issued by foreign banks (Article 6(2.1)). Under Minister of Economy Order 1104-N of 16 April 2026, the operator checks ownership, only with the player's consent, through a contracted payment institution: it passes the player's public services number (or, failing that, an identity card or

passport number), and the institution confirms or rejects a match. The rule covers Armenian citizens and foreigners using cards issued by Armenian banks.

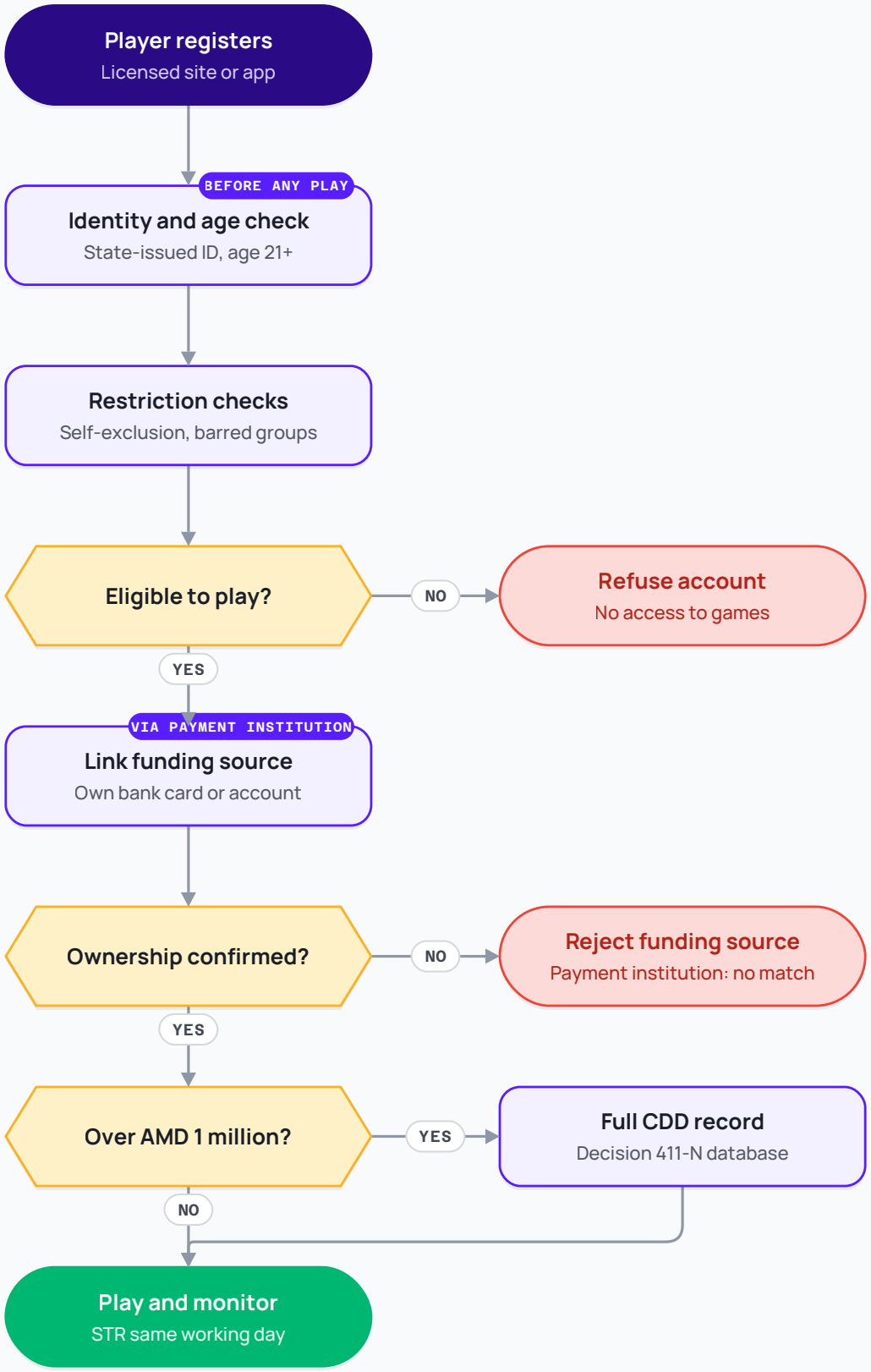


Figure 1. Online casino player onboarding under the Law on Gambling, Internet Gambling Games and Casinos.

5 Digital channels: what's different

Bottom line: for online casino games, identity is checked before the first game rather than only above AMD 1 million, and deposits from Armenian-issued accounts and cards must be proven to belong to the player.

Requirement	In person / land-based	Online / remote	Difference
Authorisation	Licence; venue only in permitted zones	Licence plus right to accept bets; named website only	Differs
When identity is verified	Under-21s barred at entry; full identification above AMD 1 million	Casino games: identification and registration before any play	Differs
Minimum age	21	21	Same
Accepted identification	Valid state-issued documents	Valid state-issued documents; no remote method prescribed	Same
Funding checks	Non-cash from own account; ownership checked in person with ID and bank certificate	Own account or card; ownership checked through a payment institution	Differs
Self-exclusion	Application to the authorised body	Same, plus a button on every page and app screen, effective within one minute	Differs
Unlicensed operators	Not applicable	Websites blocked by internet providers	Differs
AML reporting	STR same day; AMD 20 million threshold	Same	Same

Payment controls and non-residents

Winnings may be paid only to the accounts from which stakes were paid (Article 6(2.1)). Play in foreign currency is allowed only where the player is not an Armenian citizen, gave a residence address outside Armenia at identification and transacts from an IP address

outside Armenia, and payments do not go through an Armenian bank or payment institution (Article 6(2.1)).

Blocking

Unlicensed foreign internet games are blocked by internet providers (Article 4.4). Under Government Decision 1699-N of 24 October 2024, an interagency commission identifies the sites, the Minister of Economy approves the lists, and providers must block them within five working days of receiving them from the Public Services Regulatory Commission. From 2027 the SRC approves the list, shares it with the Central Bank to restrict payments, and an online platform counts as foreign if its information resources are not in the .am domain (Article 8 of the 2024 law) `Adopted, applies from 8 Feb 2027`.

6 Data protection and biometrics

The **Law on Protection of Personal Data** (HO-49-N of 18 May 2015, «Անձնական տվյալների պաշտպանության մասին») allows biometric data to be processed only with the data subject's consent, unless a law provides otherwise and its aim can be achieved only through those data (Article 13). No gambling rule requires biometrics, so selfie and liveness checks rest on consent; before processing biometric data the operator must notify the Personal Data Protection Agency (Article 23(3)). Consent must be given in writing or electronically, certified with an electronic digital signature; oral consent counts only through reliable actions that clearly show it, and the operator must be able to prove consent was obtained (Article 9(7) and (8)). A tick-box alone may therefore not meet this standard. The same consent rule bears on the consent the player gives for the account-ownership check under Order 1104-N. Identification records for players above AMD 1 million must show which employee performed due diligence (Decision 411-N, point 6). When a player self-excludes online, the operator must pass the player's name, public services number and the date and time of the request to the authorised body now, and to the regulation operator once it starts work.

7 Sector-specific obligations

Self-exclusion

Since 19 July 2026 (Law HO-279-N) a citizen may ask the authorised body to bar them from games of chance and internet games of chance for five years, renewed automatically unless they apply to lift it in the last five days (Article 6.3). Online, a button labelled "self-

exclusion" must be permanently visible on every page of the website and mobile app, taking at least 5% of the visible area or meeting criteria set by the Government, next to a display of the number of self-excluded persons. After a single confirmation window, the operator must stop the person's play within one minute and may not ask for further documents, impose a waiting period or show promotions.

Barred players

The same amendment bars from play: people betting from special protected bank accounts under Articles 928.8 and 928.9 of the Civil Code; self-excluded persons; and holders of state, community and public posts, civil workers in public bodies, and employees of state non-commercial organisations, state foundations, companies at least 50% state-owned and the Central Bank (Article 6.2). These limits apply to Armenian citizens only. Operators must also bar people whose legal capacity a court has restricted for gambling their family into hardship (Article 6.1).

Monitoring regime from 2027

Under the 2024 law, gaming products must be certified and, where the law requires, connected to a monitoring centre run by the regulation operator, which monitors transactions and gives organisers access to data on restricted persons (Article 8(10)). Barred groups widen to include beneficiaries of state poverty programmes, bankrupt persons, state budget debtors and people registered for addiction treatment (Article 47). Frequent changes of a player's IP address may be treated as a risk and trigger restrictions under criteria the Government sets (Article 47(6)).

8 Risk indicators and red flags

CASINO AND GAMES-OF-CHANCE INDICATORS FROM THE CENTRAL BANK

- **Large opening deposit**: a large amount paid in as soon as the gambling account is opened.
- **Deposit and withdraw**: funds withdrawn from the account without placing any bet.
- **Structuring**: transactions just below the identification or mandatory reporting thresholds.
- **Minimal play**: large chip purchases or repeated redemptions with little real gambling.
- **Sport-casino cycling**: funds moved back and forth between sport and casino accounts without reason.
- **Card switching**: frequent changes of the bank card used to fund or withdraw.
- **Collusion**: players making contra bets and intentionally losing to each other.
- **Third-party winnings**: attempts to obtain a certificate of winning on behalf of another person.

Source: Central Bank of Armenia, Guideline on the Criteria of High Risk and the Indicators of Suspicious Activity in Relation to Money Laundering and Terrorist Financing (Chairman's Decision 1/711-A of 11 October 2016, amended by Decision 1/347-A of 24 September 2025), section 2.3.3.

9 Enforcement and penalties

Under the Law on Gambling, Internet Gambling Games and Casinos the SRC issues warnings with orders to remedy, and fines (Article 11). Where grounds exist, the SRC asks the authorised body to suspend or terminate the licence (Articles 11(4) and 14). The SRC also enforces the advertising ban: gambling may be advertised only on the operator's website and premises, with a "21+" marking and risk warnings, and never by unlicensed operators (Law on Advertising, Article 15). MONEYVAL reports SRC due diligence fines totalling EUR 1,850 before mid-2025, then a EUR 45,000 fine in the third quarter of 2025 for risk assessment, reporting and record-keeping failures, and about 1,000 unlicensed websites blocked. Under the 2024 law, internet providers that fail to block listed sites are

liable under the Code of Administrative Offences and the Law on Electronic Communications (Article 8(7)).

Breach	Penalty	Source
Under-21s admitted to a hall, or online players not identified before play	AMD 2 million per case; AMD 5 million for a second and AMD 10 million for a third within two years	Gambling law, Article 13(2)
Restricted-capacity player rules	AMD 500,000 per case	Gambling law, Article 13(2)
Repeat of a fined breach within two years	Fine increased by AMD 1 million	Gambling law, Article 13(3)
AML obligations (legal entities)	Warning or AMD 500,000 to 5 million per breach	AML law, Article 30(4)
Asset-freezing obligations	Warning or AMD 1 million to 10 million	AML law, Article 30(4.1)

10 Recent changes and what to watch

- **8 February 2027**: the Law on Regulation of Gambling Activities starts to apply and the 2003 laws lapse `Adopted, applies from 8 Feb 2027`. Licences must be aligned within six months, products connected to the monitoring centre, and unlicensed brands must drop gambling terms.
- **1 January 2027**: Law HO-278-N amends the 2024 law, adding barred groups and the online self-exclusion button to it `Adopted, effective 1 Jan 2027`.
- **6 August 2026**: Government Decision 1155-A designates Games Analysis and Monitoring System LLC, owned by Malta-based Random Systems International Limited, as the gambling regulation operator `In force`. This starts the six-month countdown to the new law.
- **19 July 2026**: Laws HO-279-N (casino games) and HO-280-N (totalisators) add self-exclusion and bar public officials and others from play `In force`. Operators need the button and the one-minute shutdown now.
- **9 July 2026**: MONEYVAL publishes its evaluation of Armenia, adopted at its 71st Plenary (26 to 29 May 2026), calling for more and better suspicious activity reports from the private sector `Published`.

- **24 April 2026**: Minister of Economy Orders 1104-N (internet games of chance) and 1079-N (totalisators) set the procedure for checking that funding accounts and cards belong to the player `In force`, until the 2024 law applies.

11 What this means for identity verification

- **Gate before play**: for online casino games, complete identification and age verification (21+) at registration; there is no grace period.
- **Documents**: capture the full data set from a valid state-issued document, including document series, number and issue date and residence address.
- **Public services number**: collect it (or an ID or passport number) to run the account-ownership check and to report self-exclusions.
- **Biometrics**: face match and liveness are allowed but optional; notify the Personal Data Protection Agency before processing, and capture consent in a form that meets Article 9(7).
- **Restriction lists**: screen against self-exclusion and barred-group data at registration and before play, and plan for the operator's restricted-persons feed from 2027.
- **Re-verification triggers**: identification and verification data refreshed at least once a year (AML law, Article 17(2)); transactions (including linked ones) of AMD 1 million or more, doubts about earlier data, mismatched funding sources and, from 2027, frequent IP changes.
- **Retention**: keep identification and transaction records for at least five years.

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How Identomat helps

Identomat runs identity verification, screening and monitoring for regulated businesses on one platform, with workflows you configure for each market. For the requirements in this guide, that means:

- Age (21+) and identity verification at registration, before any play, with ID document capture and verification.
- Optional face match and biometric liveness with consent capture, for remote onboarding without a branch or hall visit.
- Configurable no-code workflows that add full due diligence when a player's transactions pass AMD 1 million.
- AML screening against sanctions, PEP and adverse-media lists at registration and through ongoing monitoring.
- An audit trail of each check and the data collected, supporting five-year record retention.

Request a meeting

DISCLAIMER

This article is intended for informational purposes only and does not constitute legal advice. It is a compilation of information from various sources and reflects the information available as of the last updated date indicated above. Laws, regulations, and regulatory guidance may change, so readers should consult qualified legal professionals for advice specific to their circumstances.

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