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iGaming B2B
PAGCOR
Accreditation Guide

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iGaming B2B PAGCOR Accreditation Guide

Based on the PAGCOR Regulatory Framework for the Accreditation of Gaming Affiliates and Support Service Providers (Rev. No. 1, effective 2 October 2025)

Prepared by Geronimo Law

Overview

The Philippine iGaming ecosystem is anchored on a regulatory framework administered by the Philippine Amusement and Gaming Corporation (PAGCOR) through its Electronic Gaming Licensing Department (EGLD). No business-to-business (B2B) service provider may lawfully supply products or services to a PAGCOR-accredited Gaming System Administrator (GSA), Gaming Venue Operator, or Licensee of an Integrated Resort (IR Licensee) unless it first obtains a Certificate of Accreditation (COA) issued by PAGCOR.

This obligation is not discretionary. The PAGCOR Regulatory Framework for the Accreditation of Gaming Affiliates and Support Service Providers (Rev. No. 1, effective 2 October 2025) (the Regulatory Framework) expressly provides that all GSAs, operators, and IR Licensees shall *only* engage PAGCOR-accredited B2B providers. Providing B2B services without a valid COA exposes both the provider and the operator to enforcement action, including revocation of their respective accreditations or licenses.

This guide is a practitioner's reference for iGaming companies, whether locally incorporated or foreign-based, that intend to seek accreditation as Gaming Affiliates or Support Service Providers under the Regulatory Framework. It draws directly from the PAGCOR EGLD's official documents, including EG Form No. 52 (Accreditation Application Form, effective 27 January 2026) and EG Form No. 9 (New System, Game and/or Machine Request and Approval Form, effective 11 March 2024).

Who Must Obtain Accreditation

PAGCOR recognizes two principal categories of B2B Providers: Gaming Affiliates and Support Service Providers. All entities falling within these categories that supply products or services to PAGCOR-licensed gaming operations within the Philippine jurisdiction must be accredited.

Gaming Affiliates

Gaming Affiliates are entities deriving revenue from PAGCOR-regulated gaming by supplying electronic gaming systems or game content. The Regulatory Framework recognizes two sub-categories:

Game Aggregator (GA). An entity that connects electronic and online gaming with game content providers, allowing a GSA to offer a variety of games through a single electronic gaming system. The GA provides a unified API for seamless integration into the GSA's EGS or Online Gaming Platform (OGP), manages PAGCOR-accredited Game Content Providers contracted by the GSA, and ensures smooth operation, troubleshooting, and regular maintenance. The GA's EGS must comply with system requirements prescribed in the Regulatory Framework for the Accreditation of Gaming System Administrators.

Game Content Provider (GCP). An entity providing virtual games or suites of games (including a Data/Content Streaming Provider supplying live-streamed games) to be offered by PAGCOR-accredited GSAs. Accreditation of a GCP is granted on a *per game offering basis*, i.e., a separate COA is required for each game offering category (e.g., Electronic Casino Games, Sports Betting, Numeric Games). Game contents must be approved by EGLD prior to launching in PAGCOR-licensed venues or gaming establishments.

Support Service Providers

Support Service Providers (SSPs) supply gaming-related ancillary services that are integral to the operation of a GSA's electronic gaming system. The Regulatory Framework identifies five categories of SSPs:

Category	Function
Payment Gateway Solution / Payment Channel (PC)	Enables a GSA to securely credit and debit player payments. Must be AMLC-compliant and accredited, approved, or registered with the Bangko Sentral ng Pilipinas (BSP). Credit cards and cryptocurrency are not permitted for account funding or withdrawal.
Marketing / Promotional Service (MPS)	Develops, designs, and implements gaming promotions and marketing activities for PAGCOR-accredited GSAs. All marketing programs must target only prospective and registered players from the domestic market; foreign players must be blocked.
Customer Service (CS)	Provides 24/7 player support to PAGCOR-accredited GSAs, including player inquiry handling, ticketing systems, and complaint resolution within seventy-two (72) hours of filing.
KYC / Membership System	Supplies software and platform for player account management including identity verification, PAGCOR NDRP screening, age verification (minimum 21 years), and secure data storage and DPA compliance.
Independent Game Testing Laboratory (IGTL)	Tests and certifies gaming software, systems, and platforms for compliance with RNG requirements, RTP percentage

Category	Function
	compliance, and applicable technical standards. Must hold ISO/IEC 17025 and/or 17065 certification.

Eligibility Requirements

Corporate Registration

Only corporations duly registered with the SEC of the Philippines may apply for accreditation. Foreign-based B2B providers, or their local counterpart/business in the Philippines, must register with the SEC before they can transact in the Philippines. A foreign-based Gaming Affiliate may initially appoint a local entity or a PAGCOR-accredited GSA as its exclusive distributor (each entity may hold up to a maximum of five such distributorships), but this arrangement is automatically void once the foreign-based entity is itself accredited by PAGCOR.

PAGCOR Probity Standards

Every applicant must satisfy PAGCOR's probity standards. The applicant, its directors, officers, and shareholders must: (a) be of good repute considering character, honesty, and integrity; (b) not be associated with any person who is not of good repute or who has unsatisfactory financial resources; (c) have sufficient experience and ability to establish and manage gaming operations; (d) not be among those excluded from engaging in gaming under applicable law or PAGCOR regulation; and (e) in the case of an artificial person, be of stable financial standing with a satisfactory corporate structure.

Probity checking is undertaken by the PAGCOR Investigation and Verification Department (IVD) through a third-party probity checker, the cost of which is borne by the applicant. The check covers the identity, finances, integrity, competence, and criminal background of each key official of the corporate applicant.

GLDD Enrolment Prerequisite

Before filing an accreditation application with the EGLD, an applicant must first enroll with PAGCOR's Gaming Licensing and Development Department (GLDD). The GLDD enrolment certificate is a required attachment to the accreditation application. Enrolment procedures and requirements are prescribed in PAGCOR's Suppliers Regulatory Manual, available from the PAGCOR regulatory website.

Documentary Requirements

The following documents are required for all B2B accreditation applications, as prescribed in Annex A of the Regulatory Framework and as reflected in EG Form No. 52. Applicants with incomplete submissions will have their applications returned;

resubmission is permitted only after all insufficiencies are addressed. PAGCOR reserves the right to require additional documents.

Document	Notes
Company Profile	Description of the company, its history, organizational structure, and service capabilities.
Detailed location sketch of company office	Floor plan or location map showing the address of the applicant's principal office.
SEC Registration Certificate, Articles of Incorporation, and By-Laws	Certified true copy duly received by the SEC. Foreign entities must submit equivalent registration documents from their home jurisdiction.
Latest General Information Sheet (GIS)	Must be duly received by the SEC; used to verify compliance with PAGCOR probity standards and identify ultimate beneficial owners.
Valid Mayor's Permit/Business Permit/Municipal License	For the location of the company office.
BIR Registration Certificate	Confirms tax registration status.
Duly notarized Secretary's Certificate	Authorizing the signatory to represent, transact, execute, and sign all documents relative to accreditation with PAGCOR and to claim the COA.
Notarized written disclosure — service capability	Declares that the applicant has the capability to provide the services outlined in the Regulatory Framework in accordance with PAGCOR's prescribed standards.
Notarized written disclosure — integrity disclosures	Describes any bankruptcy petitions, criminal convictions or pending proceedings, restraining orders, and adverse regulatory findings against any director or shareholder during the past five (5) years.
GLDD Certificate of Enrollment	Issued by PAGCOR's Gaming Licensing and Development Department; confirms the applicant is enrolled as a supplier.
Personal Disclosure Statement (PDS) (EGLD Form No. EGLD-447)	Duly accomplished and notarized; must be submitted for each director. Attach: (a) ITR for the previous year (Filipino citizens and foreign residents); (b) valid passport (non-resident foreigners); or (c) notarized Certificate of Non-Filing of ITR (EG Form No. 33) if ITR is not required.
Authorized Signatory with Specimen Signature and Information Form (EGLD-1310)	Duly accomplished and notarized.
Notarized non-affiliation disclosure	Declares that the applicant is not an affiliate of any existing B2B provider of the same category/type (no common directors, subsidiaries, or directors related

Document	Notes
	within the 3rd civil degree to directors of existing B2B providers of the same category).
Proof of exclusive distributorship (if applicable)	Notarized/authenticated/consularized proof of exclusive distributorship from a foreign-based Gaming Affiliate.
Category-specific credentials (see below)	Additional documents depending on whether the applicant is a GA, GCP, PC, MPS, CS, KYC Provider, or IGTL (detailed in the next section).

Category-Specific Documentary Requirements

In addition to the common documents above, each accreditation category requires the following category-specific submissions:

Game Aggregator

(a) Latest list of partner game content providers; (b) existing game library; (c) copy of valid license/s from recognized regulatory bodies; (d) endorsement letter from a GSA contracted by the GA; and (e) narrative on previous partnerships.

Game Content Provider

(a) Most recent list of regulatory jurisdictions where the games are licensed to operate; (b) list of existing games or suites of games along with brochures, if any; and (c) endorsement letter from a GSA or game aggregator contracted by the GCP.

Payment Channel

(a) Latest list of clients; (b) copy of registration certificates issued by the BSP; (c) narrative on previous partnerships; and (d) proof of compliance with the BSP's National Retail Payment System (NRPS) or Designated Payment System (DPS), if any.

Marketing / Promotional Service

(a) Latest list of clients; (b) copy of licenses or certifications issued by relevant regulatory bodies or professional associations (e.g., Philippine Association of National Advertisers, Ad Standards Council of the Philippines); and (c) narrative and/or examples of previous works.

Customer Service

(a) Latest list of clients; (b) copy of licenses or certifications/awards issued by relevant regulatory bodies or professional associations; (c) proof of affiliation or membership in any professional association related to customer service (e.g., National Customer Service Association); and (d) narrative on previous partnerships.

KYC / Membership System

(a) Latest list of clients; (b) copy of certification with ISO 27001; and (c) narrative on previous partnerships.

Independent Game Testing Laboratory

(a) Most recent list of regulatory jurisdictions where the IGTL is recognized; (b) copy of certification with a rating of ISO/IEC 17025 and/or 17065; (c) copy of citations/awards issued by any regulatory jurisdiction or recognized organization, if any; and (d) proof of affiliation with subsidiary companies if represented to PAGCOR.

The Accreditation Application Process

The PAGCOR B2B accreditation process follows a structured sequence. Understanding each step, and its timing requirements, is essential to avoid delays, unnecessary fees, or rejection.

Step 1: GLDD Enrolment

Before any accreditation application is filed, the prospective B2B provider must enroll with PAGCOR's Gaming Licensing and Development Department (GLDD). Enrolment cannot be bypassed and is a gateway condition to the EGLD process.

Step 2: Letter of Intent

The applicant shall submit a Letter of Intent (LOI) addressed to the PAGCOR Chairman and Chief Executive Officer. The LOI is a formal expression of intent to seek accreditation and triggers the pre-filing review process at the EGLD.

Step 3: Filing the Application Form

The applicant obtains and completes EG Form No. 52 (Accreditation of Gaming Affiliates Application Form) or EG Form No. 51 (for Support Service Providers), available from the PAGCOR regulatory website. The form requires full corporate information, contact details, game offerings applied for (for GCPs), gaming system administrator contracted (if any), and authorized representative details. The completed form, together with all documents required under Annex A of the Regulatory Framework, is filed with the EGLD. Submission cut-off is 4:00 P.M. Only applications with complete requirements are considered received.

Step 4: EGLD Approval to Pay and Application Fee

Critically, the applicant must secure approval from the EGLD *prior to* payment of the non-refundable Application Fee. Payment made without EGLD approval is irregular. The applicable fees are:

Accreditation Category	Application / Renewal Fee
Game Aggregator	PhP250,000.00 for two (2) years
Game Content Provider	PhP250,000.00 for two (2) years, per game offering

Accreditation Category	Application / Renewal Fee
Payment Channel	PhP250,000.00 for two (2) years
Marketing / Promotional Service	PhP250,000.00 for two (2) years
Customer Service	PhP250,000.00 for two (2) years
KYC / Membership System	PhP250,000.00 for two (2) years
Independent Game Testing Laboratory	PhP500,000.00 for two (2) years

Step 5: Ocular Inspection, Walkthrough, and Testing

Once the application is found compliant with submitted requirements, the PAGCOR Inspection Team, composed of representatives from EGLD, the Compliance Monitoring and Enforcement Department for Electronic Games (CMED-EG), and the Information Technology Department (ITD), shall conduct an ocular site inspection of the applicant's facility and observe the walkthrough and actual testing of the EGS, game contents, and OGP. The follow-up walkthrough prior to issuance of the Notice to Commence shall be conducted in the registered live production environment and/or gaming studio set-up using PAGCOR-approved test accounts.

Step 6: Recommendation to the PAGCOR Board of Directors

The application is recommended to the PAGCOR Board of Directors for approval only upon full compliance with: (a) submission of complete documentary requirements; (b) payment of the non-refundable Application Fee; (c) satisfactory ocular inspection results and actual testing; and (d) compliance with probity requirements. The EGLD will inform the applicant of the Board's decision.

Step 7: Issuance of the Certificate of Accreditation and Performance Cash Deposit

Upon Board approval, PAGCOR issues a Certificate of Accreditation (COA) signed by its Chairman and Chief Executive Officer. The original COA is released within sixty (60) days from date of Board approval upon submission of post-approval requirements (government-issued ID of authorized recipient, Board Resolution authorizing receipt, and, for new providers, original receipt for payment of the Performance Cash Deposit).

Before commencing operations, the accredited B2B provider must post a **Performance Cash Deposit (PCD) of PhP1,000,000.00** to PAGCOR. For GCPs, this PhP1 Million PCD applies regardless of the number of game offerings. The PCD is held as security for the performance of the provider's obligations under its accreditation.

Step 8: Notice to Commence Operations

Once all pre-commencement requirements are satisfied, including the posting of the PCD and satisfactory completion of the system walkthrough, EGLD issues a Notice to Commence Operations. Only upon receipt of this Notice may the Gaming Affiliate or

Support Service Provider begin offering its services to GSAs, Operators, and IR Licensees.

Game and System Approval: EG Form No. 9

For Game Aggregators and Game Content Providers, accreditation alone is not sufficient to deploy games or activate a gaming system. A separate approval must be obtained from the EGLD for each electronic gaming system, game software, and game content before implementation and launching. This approval is sought through **EG Form No. 9** (New System, Game and/or Machine Request and Approval Form), effective 11 March 2024 (Rev. No. 4).

PAGCOR allows thirty (30) business days from the submission of complete information and attachments for the EGLD to process an EG Form No. 9 request. Only requests with complete documentation are processed. Applications must be submitted to the EGLD by 4:00 P.M. on the cut-off date.

What Must Be Submitted with EG Form No. 9

Section A of EG Form No. 9 requires the following, as applicable to the type of system, game, or machine being submitted:

Item	Required Documentation
Electronic System (New or Upgrade)	System documents (manuals, technical specifications, diagrams, process flows, list of functionalities, server/terminal requirements, progressive jackpot requirements); System accounting documents and sample system-generated reports; Certification from a reputable gaming laboratory that the RNG is compliant with GSRM Regulation 8 standards; Certification from the Content Provider that the EGS has been tested and found compliant.
Game Software / Sports Market (New or Upgrade)	Game documents (game rules, mechanics, pay tables, bonus features, RTP percentage for each game, progressive jackpot if any; IRG for each sports market); Proposed game parameters (bet denominations, min/max bet, RTP settings, capping on payout); Gaming laboratory certification that RNG is compliant; Certification from gaming laboratory or Content Provider that RTP of each electronic game is within PAGCOR-prescribed range.
Electronic Machine (New or Upgrade)	Machine documents (cabinet specifications and hardware components); Gaming laboratory certification for electronic bingo; Machine manufacturer certification for eGames/InstaWin.
Bingo System (New or Upgrade)	Bingo system documents (technical specifications, manuals); Certification from supplier or system provider (or gaming laboratory if supplier fails to certify).
Traditional Bingo Game (New or Upgrade)	Game documents (variant rules, prize payout structure, ticket/card design, bonus features, progressive jackpot); Game parameters (ticket price, progressive increment); Certification from Supplier (or gaming laboratory in default).

The authorized representative of the Service Provider must certify on EG Form No. 9 that: (a) the gaming system, games, and/or machines comply with technical standards under GSRM Regulations 8 and 9; (b) a test environment will be provided for EGLD-observed testing; (c) any deviation from submitted certifications may result in suspension; and (d) no change will be made to game parameter settings without prior EGLD notification or approval.

RTP Percentage Requirements

Each approved game must comply with PAGCOR's prescribed RTP percentage ranges, applied retroactively:

Game Type	Prescribed RTP Range
Electronic game of slot machine type	90.00% to less than 97.00%
Electronic casino/specialty games (RNG-based or live-streamed)	Odds, payouts, and house advantage similar to equivalent live games
Arcade type / skill games	Less than 99.00%
eBingo	88.00% to less than 97.00%
Traditional bingo	60.00% to 97.00%
RNG-based specialty or numeric games	60.00% to 97.00%

Ongoing Compliance Obligations

Obtaining the COA is the beginning of a continuous compliance relationship with PAGCOR. Accredited B2B providers must maintain compliance with numerous post-accreditation obligations throughout the validity of their COA.

Annual Documentary Submissions

On or before **31 May of each year**, all accredited B2B providers must submit to the EGLD: (a) photocopy of the latest GIS duly filed with the SEC; (b) original copy of the duly filled-out Authorized Signatory with Specimen Signature and Contact Information Form; (c) photocopy of valid Mayor's/Business Permit for the location of business and/or live studio gaming set-up previously registered to PAGCOR; and (d) original copy of the duly accomplished and notarized PDS, uploaded through PAGCOR's Electronic Submission of Annual Documentary Requirements (ESADR). Failure to submit after a sixty (60)-day grace period results in penalties under the Regulatory Framework for Offenses and Penalties (Remote Gaming Operations).

Change in Ownership or Board Composition

Any change in ownership or in the Board of Directors must be reported to the EGLD within **thirty (30) calendar days** from occurrence. For new accreditees, any sale or

transfer of shares is prohibited for the first **six (6) months** from the date of accreditation approval, unless prior written approval is obtained from the EGLD for serious and justifiable cause. Substantial changes in ownership are subject to verification by a third-party probity checker.

AML Compliance

All accredited B2B providers must comply with the rules and regulations of the Anti-Money Laundering Council (AMLC), as clarified, implemented, and supervised by PAGCOR's Anti-Money Laundering Supervision and Enforcement Department (PASED). Non-compliance, as determined by PASED, shall result in the imposition of corresponding penalties.

Data Privacy Act Compliance

All accredited B2B providers must comply with Republic Act No. 10173 (Data Privacy Act of 2012), as clarified, implemented, and supervised by the Data Privacy Section of PAGCOR's Information Technology Department (ITD). Providers processing personal data of Philippine residents must implement appropriate technical and organizational data protection measures.

Non-Exclusivity and Authorized Clients Only

B2B providers must offer their products and services *only* to PAGCOR-licensed Gaming Venue Operators, PAGCOR-accredited GSAs, and IR Licensees. Offering services to entities outside these categories is ground for revocation of accreditation. Correspondingly, GSAs and operators may not require exclusivity provisions in their contracts with B2B providers in order to promote healthy competition within the local electronic gaming sector.

Permit to Hold for Live Dealer and Game Development Activities

A Game Content Provider (GCP) seeking to stream live games from a live dealer gaming studio set-up in the Philippines — or to hold gaming equipment for game development/research — must separately obtain a **Permit to Hold (PTH)** Gaming Equipment and Gaming Paraphernalia from the EGLD. The PTH Application Fee is PhP1,000,000.00 per site, renewable annually at the same amount. Live dealer gaming studios must have at least four (4) gaming tables for Electronic Casino Games and at least two (2) gaming tables for other game offerings, with a minimum floor area of 100 square meters.

Data/Content Streaming Providers (DCSP) that are foreign-based, or their local representatives, must establish a live dealer gaming studio or branch office located within the Philippines and apply for the corresponding PTH.

Validity, Renewal, and Revocation

Validity Period

The COA and PTH are each valid for **two (2) years** from the date of PAGCOR Board approval.

Renewal

Renewal applications must be filed with the EGLD, together with complete updated documentary requirements, **at least two (2) months prior to expiration** of the COA and PTH. The renewal process broadly mirrors the initial accreditation process. Where renewal cannot be completed before expiry, an extension may be granted subject to: (a) application submitted not later than thirty (30) calendar days before expiry; (b) payment of the corresponding Renewal Fee; (c) satisfactory evaluation of reasons for extension; and (d) payment of an Extension Fee of PhP1,000.00 per day of extension.

How Geronimo Law Can Help

Geronimo Law is a full-service Philippine law firm with specialized depth in gaming regulation, technology law, corporate compliance, and administrative proceedings. We advise iGaming companies, from multinational game studios to fintech payment processors, KYC platforms, and marketing technology providers, on every stage of the PAGCOR accreditation process and the ongoing regulatory obligations that follow.

If you have questions on PAGCOR B2B accreditation, please contact us at attorney@geronimo.law or visit www.geronimolaw.com.

DISCLAIMER

This guide is prepared by Geronimo Law for general informational purposes only and does not constitute legal advice. The PAGCOR regulatory framework and EGLD forms are subject to revision and amendment by PAGCOR at any time. Readers are encouraged to verify current requirements with PAGCOR and to seek specific legal advice regarding their particular circumstances. No attorney-client relationship is created by the receipt or review of this guide.

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