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iGAMING REGULATION IN THE UAE

20 April 2026

The UAE has not yet enacted a unified iGaming law. However, the General Commercial Gaming Regulatory Authority (“GCGRA”) was established under Federal Decree No. (30) of 2022 to regulate commercial gaming and now functions as the central regulator for commercial gaming in the country.

Experts at White Square have created an in-depth analysis of the GCGRA's iGaming framework, along with the latest industry trends and recommendations.

This material is based on information from public sources and is for reference purposes only. It does not constitute advice or a legal opinion. If you have any questions regarding this alert, please contact us at: info@whitesquarepartners.com.

1. Purpose of the GCGRA

The GCGRA has been established as the federal authority tasked with the development and oversight of a comprehensive regulatory framework for all lottery and commercial gaming activities within the UAE¹.

Its regulatory framework includes:

- 1) the formulation and maintenance of clear and transparent rules, standards, and guidelines;
- 2) the issuance, renewal, and maintenance of commercial gaming licenses;
- 3) the supervision, guidance, and enforcement of compliance with applicable regulations;
- 4) the prevention of financial crimes associated with gaming activities.
- 5) the promotion and enforcement of responsible gaming practices.

Notably, the UAE continues to modernize its iGaming sector by clearing the path for the GCGRA, rather than through full liberalization. For instance, the repeal of Articles 1012 to 1021 under the Civil Transactions Law (Federal Decree-Law No. 25 of 2025) enables the GCGRA to introduce specific regulations for online gambling, sports betting, casinos, and lotteries.

2. Licensing

2.1. Types of Licenses

GCGRA establishes five types of licenses²:

- 1) Gaming Operator (casinos, online games, sports betting, lotteries);
- 2) Gaming-Related Vendor (technology, equipment, and service providers);
- 3) Key person (corporate – (owners, managers));
- 4) Key person (individuals – owners, managers));
- 5) Gaming Employee (two levels, from line staff to management).

Depending on the business model, several licenses may be required (e.g., operator and vendor)³.

2.2. Licensing Requirements

To determine if UBOs, shareholders, and group entities are 'fit and proper' for obtaining a license, they will be assessed on their integrity, financial stability, and criminal history.⁴

The GCGRA's Guide to Obtaining a Commercial Gaming License ("**Guide**") does not set minimum capital requirements. However, the Guide specifies that the application must address the financial situation, available resources for carrying out the licensed activity, the reliability of the budget, and the guarantees of securing the necessary assets and permits. It must also include an assessment of the project's

¹ Guide to obtaining a commercial license in the UAE. GCGRA. (available via [the link](#)).

² GCGRA's Guide to Obtaining a Commercial Gaming License in the UAE (available at [the link](#)).

³ GCGRA's Guide to Obtaining a Commercial Gaming License in the UAE (available at [the link](#)).

⁴ UAE Commercial Gaming Law: GCGRA Licences, Online Gaming, Sports Wagering And Lotteries (available at [the link](#)).

financial condition, funding sources, and financing terms⁵.

Additionally, applicants shall provide:

- 1) corporate documentation;
- 2) organization chart showing all related business entities;
- 3) description of business activities;
- 4) directors and officers information;
- 5) financial information, including financial accounts;
- 6) Qualifying Domestic Entity (QDE) details;
- 7) details of key persons;
- 8) third-party details, including legal advisors, auditors and accountants;
- 9) information on the applicant's legal history (statutory, regulatory, financial, criminal, political);
- 10) overview of the responsible gaming plan to be put in place.

2.3. Costs and Timelines

Application fees follow the GCGRA-approved schedule, with a 10% pre-approval fee payable upfront and the remaining portion of the license fee due before issuance. An annual license maintenance fee also applies based on the license type, and all fees are non-refundable with exact amounts not publicly disclosed⁶.

The license application is typically processed within 8–12 weeks from submission⁷.

3. Practical Implications

3.1. Licenses Issued

As of April 2026, licenses issued include, but not limited to, an online lottery license granted to the UAE Lottery on 28 July 2024⁸, the first Gaming Service Provider license granted to Aristocrat on 29 October 2024⁹, and the first internet gaming and sports wagering license granted to Play971 in December 2025¹⁰.

3.2. Reasons for Potential Growth

Demand for the UAE market is expected to rise markedly, largely supported by its significant population of high-net-worth expatriates, comprising approximately 80–90% of residents, who are attracted by the country's strong living standards, low crime rate, and absence of taxes on income, capital gains, and inheritance¹¹.

3.3. Limitations

The UAE remains at an early stage of regulatory development¹², as despite the establishment of the GCGRA, existing prohibitions on gambling under the UAE Criminal Code continue to apply¹³. As a regional pioneer, the future trajectory of the industry remains uncertain, particularly in light of cultural and religious considerations¹⁴.

Besides, strict compliance requirements are expected to remain a defining feature of the market, as illustrated by the UAE Lottery, where participation is limited to individuals physically present within the UAE at the time of lottery¹⁵.

⁵ Guide to obtaining a commercial license in the UAE. GCGRA (available at [the link](#)).

⁶ Guide to obtaining a commercial license in the UAE. GCGRA (available at [the link](#)).

⁷ Gaming License in Dubai (available at [the link](#)).

⁸ The UAE Lottery (available at [the link](#)).

⁹ Aristocrat (available at [the link](#)).

¹⁰ UAE: First licensed sports wagering and iGaming website launches (available at [the link](#)).

¹¹ MGM Resorts still waiting on UAE casino licence (available at [the link](#)).

¹² Articles 460 and 461 of Federal Law by Decree No. (31) of 2021 Promulgating the Crimes and Penalties Law of the UAE ("Penal Code") (available at [the link](#)).

¹³ Betting On Change: The UAE Rolls On New Regulator For Gaming Licences (available at [the link](#)).

¹⁴ UAE's Vendor Licensing Wave: Building the Tech Stack for Wynn Al Marjan (available at [the link](#)).

¹⁵ FAQ. The UAE Lottery (available at [the link](#)).

White Square team has extensive experience advising iGaming companies around the world, ranging from regulatory and intellectual property matters to corporate and tax structuring.

In the world of iGaming—we'll make sure you play by the rules!

Participation in gambling games in any jurisdiction does not guarantee a win, may result in the loss of money, and may cause addiction.

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