



PAGCOR RELEASES IMPLEMENTING RULES FOR THE ACCREDITATION OF GAMING AFFILIATES AND SUPPORT SERVICE PROVIDERS

Regulatory Context and Purpose of the New Accreditation Regime

The Philippine Amusement and Gaming Corporation (“**PAGCOR**”) has released the Regulatory Framework for the Accreditation of Gaming Affiliates and Support Service Providers (Revision 1), which serves as the comprehensive accreditation framework for all business-to-business (B2B) service providers supporting its regulated iGaming industry (the “**B2B Accreditation Framework**”).

Arden first reported on this initiative when PAGCOR, through its memorandum dated April 30, 2025, announced its plan to bring B2B providers under a formal regulatory structure. The newly issued B2B Accreditation Framework now provides the complete set of rules, requirements, and procedures governing the accreditation of Gaming Affiliates and Support Service Providers, clarifying how PAGCOR intends to regulate and monitor this sector moving forward.

This development marks a significant shift from the previous regime, under which many service providers operated without direct PAGCOR approval. By mandating accreditation, PAGCOR aims to strengthen oversight across the iGaming ecosystem, ensuring that all third-party providers meet rigorous probity, technical, and compliance standards.

Implemented by PAGCOR’s Electronic Gaming Licensing Department (EGLD), the Framework took effect on October 2, 2025, signaling a transition to a more structured and accountable B2B environment. The new regime promotes transparency, integrity, and regulatory alignment, reinforcing PAGCOR’s broader commitment to protect the licensed gaming industry from unvetted and non-compliant actors.

This regulatory direction is consistent with the best practices adopted in mature iGaming jurisdictions such as the United Kingdom, New Jersey, Malta, Germany, and Ontario, where regulators have likewise introduced B2B licensing or accreditation requirements for software suppliers, game aggregators, payment service providers, and affiliates. These jurisdictions have demonstrated that a licensing-based model—focusing on supplier accountability rather than prohibition—effectively curbs illegal gambling by cutting off unlicensed operators from legitimate content, technology, and payment networks. PAGCOR’s framework follows the same principle: safeguarding the integrity of its licensed market by ensuring that only accredited and probity-cleared entities may participate in the supply chain.

Under the new framework, accreditation is mandatory for entities providing gaming content, technology, or support services to PAGCOR-licensed operators. While accreditation is not an operator's license, it is a prerequisite approval that all support service companies must obtain to lawfully offer their products or services to PAGCOR-authorized gaming operators.

Scope of Providers Requiring PAGCOR Accreditation

The accreditation requirement applies to a broad range of B2B provider categories defined in the new framework. Only duly registered corporations may apply for accreditation, and they must qualify as one of the following provider types:

- **Gaming Affiliates**, which include:
 - **Game Aggregators** – entities that integrate and offer multiple game content from various developers to operators.
 - **Game Content Providers (GCPs)** – game developers or studios providing electronic game software or live game streams for operators. Each GCP is accredited **per game offering**, meaning a separate PAGCOR accreditation is required for each category of game content supplied.
- **Support Service Providers (SSPs)**, which cover various ancillary services necessary for gaming operations. SSP sub-categories include:
 - **Payment Channel Providers** – e.g. payment gateway solutions and e-wallet services that are AMLC-compliant and BSP-registered.
 - **Marketing/Promotional Service providers** – agencies handling marketing or player acquisition for gaming operations.
 - **Customer Service providers** – companies offering customer support or call-center services to gaming operators.
 - **Know-Your-Customer (KYC) / Membership System providers** – entities providing player identity verification and membership database systems.
 - **Independent Gaming Testing Laboratories (IGTLs)** – certified third-party labs that test and certify game software for fairness and compliance.

These Gaming Affiliates and SSPs are collectively deemed B2B providers under PAGCOR's rules. The framework obliges all PAGCOR-licensed casinos, eGaming operators, and accredited Gaming System Administrators to engage only accredited B2B providers for any games, systems, or services. In fact, any B2B service provider contracted by a PAGCOR licensee or accredited GSA must hold PAGCOR accreditation. This means unaccredited game suppliers, payment processors, marketing affiliates, etc., can no longer lawfully operate in the Philippine regulated market. By clearly delineating covered provider categories, PAGCOR ensures that virtually all critical vendors – from game content aggregators to payment and support service firms – are brought within its regulatory jurisdiction.

Accreditation Process, Duration, and Key Requirements

Application and Review: To obtain accreditation, an applicant company submits its application to PAGCOR's EGLD along with extensive documentation and fees. Only SEC-registered corporations are eligible, and applicants must meet PAGCOR's probity standards (e.g. being of good repute, financially sound, and with relevant experience). The applicant must furnish a complete set of documentary requirements (as listed in Annex A of the framework) and pay the prescribed non-refundable application fee. Documentation typically includes corporate registrations, constitutional documents, financial statements, ownership disclosures, Personal Disclosure Statements for directors, technical specifications, and other evidence demonstrating the applicant's suitability and capability to serve the gaming industry. PAGCOR will conduct thorough background checks and probity checks on the company, its key officers, and beneficial owners in accordance with the Probity Checking Framework issued by its AML supervision department. An ocular inspection of the applicant's facilities and an evaluation/testing of any gaming system or platform may also be conducted to verify technical competence.

Once the applicant satisfies all requirements – including probity clearance, technical evaluation, and complete documentation – the EGLD forwards a recommendation to PAGCOR's Board of Directors for approval of the accreditation. If the Board approves, PAGCOR issues a Certificate of Accreditation (COA) signed by its Chairman/CEO, formally recognizing the applicant as an accredited Gaming Affiliate or SSP. The COA is released to the provider upon submission of final post-approval requirements (e.g. proof of identity of the receiving representative, board resolution authorizing receipt, and evidence of Performance Cash Deposit posting).

Validity and Term: Under the new regime, an accreditation's validity is two (2) years from the date of Board approval. This represents an increase from the previous one-year term, aligning with PAGCOR's shift to a biennial accreditation cycle for B2B providers. After issuance, the accredited provider must post a Performance Cash Deposit (PCD) with PAGCOR before commencing operations. The required PCD amount is PhP 1,000,000 for each accredited provider (for each game offering, in the case of a GCP, or each service category for an SSP). This uniform deposit applies regardless of the number of games or services offered, and must be posted prior to launching any game content or service for PAGCOR operators. The PCD serves as financial security for the provider's obligations and can be drawn on or forfeited by PAGCOR in certain circumstances (such as regulatory penalties or accreditation revocation, as discussed below).

Accredited providers are issued a Notice to Commence Operations once all pre-commencement conditions are met (including the PCD posting), at which point they may officially offer their games or services to PAGCOR-licensed operators and integrated resorts. The framework also outlines procedures for renewing accreditation. Providers wishing to continue beyond the two-year term must apply for renewal at least 2 months before expiry, with complete updated documents. PAGCOR may extend the processing of a

renewal application, provided the renewal request was submitted no later than 30 days before the accreditation's expiration. This grace period ensures continuity for diligent providers. If a renewal is approved, the accreditation is extended upon payment of renewal fees and continued compliance with requirements. In sum, the accreditation process imposes rigorous front-end scrutiny — corporate due diligence, technical vetting, and financial guarantees — and requires ongoing compliance to maintain the privileged status of an accredited B2B provider.

Deadlines for Filing and Transitional Compliance

PAGCOR has set specific timelines to implement this accreditation regime, with incentives to encourage early compliance by existing service providers. The new regulatory framework took effect on October 2, 2025, but a transition period allows currently operating providers to seek accreditation without disrupting ongoing services. Notably, PAGCOR is offering an incentive for prompt applicants: any application for Gaming Affiliate or SSP accreditation submitted by December 31, 2025 (with complete requirements) will receive an initial accreditation valid for three years instead of the standard two years. This one-time extension rewards early compliance, effectively covering 2026–2028 for those who qualify. Companies are thus urged to file before the 2025 year-end deadline to take advantage of the three-year initial term.

For providers already integrated into Philippine online gaming operations (especially foreign-based game content streams that were previously permitted), PAGCOR has imposed a hard cut-off in early 2026. Foreign Data/Content Streaming Providers (DCSPs) or game content providers that are not yet accredited but whose live game feeds have been temporarily allowed on PAGCOR-accredited platforms must complete their PAGCOR accreditation by March 31, 2026. PAGCOR explicitly states that any live game content from a *foreign, non-accredited* provider may remain in operation only until March 31, 2026. By that date, the foreign provider (or its local distributor) must obtain PAGCOR accreditation to continue offering its games. Failing that, the content will be deemed “non-compliant and unauthorized” and will be removed from all PAGCOR-authorized gaming platforms after the deadline. This transitional allowance gives foreign game providers a few months of leeway to file their applications and undergo the accreditation process, ensuring continuity of gaming content for operators in the interim.

Beyond these specific dates, the expectation is that all B2B providers currently serving PAGCOR licensees should regularize their status as soon as possible under the new framework. With the framework now in force, unaccredited service providers (local or foreign) will find themselves unable to lawfully engage with licensed operators going forward. In practice, the end of Q1 2026 marks the full cutoff for any grandfathered arrangements. Companies that do not submit accreditation applications by the deadlines risk service interruption and loss of business, as operators will be prohibited from using unaccredited vendors. PAGCOR's phased implementation – offering incentives for 2025

filers and a Q1 2026 final compliance date for legacy foreign content streams – reflects a balance between strict enforcement and giving the industry time to adapt.

Provisions for Foreign Gaming Affiliates and Providers

The Framework also provides an alternative option for foreign Gaming Affiliates: instead of establishing a local presence, they may appoint a Philippine-registered entity or a PAGCOR-accredited GSA as their exclusive distributor of products and services in the country. This arrangement allows a foreign Gaming Affiliate to lawfully participate in the regulated market through a duly accredited local partner. Each local distributor may represent up to five (5) foreign Gaming Affiliates, and the distributorship automatically terminates once the foreign principal secures its own PAGCOR accreditation, at which point it becomes directly subject to PAGCOR's compliance and probity requirements.

As currently drafted, this exclusive distributorship option appears to be available only to Gaming Affiliates, and not to other B2B categories such as Support Service Providers. The language of the Framework limits the provision to *foreign-based Game Aggregators or Game Content Providers*, suggesting that further clarification from PAGCOR may be necessary to determine whether similar arrangements may be extended to other types of foreign service providers in the future.

Consequences of Non-Compliance

PAGCOR's accreditation framework is backed by enforcement mechanisms and penalties to ensure compliance. Operating as a Gaming Affiliate or Support Service Provider without PAGCOR accreditation is a regulatory violation that carries significant consequences. From the operator side, PAGCOR has made clear that any GSA or licensee utilizing an unaccredited service provider is subject to sanctions. For example, if a licensed operator (GSA) were to implement or integrate an unaccredited SSP's system, that unauthorized operation may result in fines or other penalties under PAGCOR's regulatory offense schedule. Thus, operators have a strong incentive to cease dealing with non-accredited vendors, or else face punitive action for abetting unapproved services.

For the service providers themselves, failing to obtain or maintain accreditation can lead to both immediate and long-term repercussions. As noted, any game content from an unaccredited source will simply be removed from service after the grace period, cutting off the provider's market access. Beyond that, PAGCOR has powers to suspend or revoke the accreditation of a B2B provider if it violates the law or any conditions of its accreditation. The framework enumerates various grounds for suspension or cancellation of accreditation – such as if the provider is deemed no longer suitable or is found to have engaged in dishonest conduct, violated anti-gambling laws, breached accreditation conditions, become insolvent, or obtained its accreditation by misrepresentation. A provider's accreditation can also be revoked if its actions adversely affect public interest or the integrity of gaming, or if it causes irreparable harm to PAGCOR's reputation or the industry.

If, after due investigation, the PAGCOR Board finds an accredited provider guilty of any serious violation, the Board will approve the suspension or revocation of its accreditation. In such cases, PAGCOR may also order the forfeiture of the provider's Performance Cash Deposit (in whole or in part) as an additional penalty. For instance, if an accredited Game Content Provider were complicit in unauthorized gambling activities or failed to comply with mandated standards, the Php 1 Million deposit it posted can be seized by PAGCOR. This provides a financial disincentive against non-compliance. Moreover, operating without accreditation in the first place would preclude a provider from having any deposit on file – meaning the ultimate “penalty” is exclusion from the market entirely, and potential blacklisting or legal action if the activity persists.

In practice, companies that do not comply with the new accreditation requirements risk disqualification from doing business with any PAGCOR-licensed operator. Contracts between operators and unaccredited B2B providers are effectively untenable under the new rules, and PAGCOR has directed that all B2B services must be sourced from accredited providers only. The enforcement extends to ongoing compliance as well: accredited providers must adhere to continuous obligations (such as data privacy laws, periodic reporting, and maintaining suitability). Failure to uphold these obligations can result in suspension proceedings or non-renewal of accreditation. In short, non-compliance – whether by failing to get accredited or by breaching accreditation conditions – carries severe professional and financial consequences, including loss of market access, monetary fines, forfeiture of deposits, and reputational damage. PAGCOR has made it clear that the era of loosely monitored service providers is over, and only those willing to operate under stringent regulatory scrutiny will be permitted to continue.

Alignment with Global Regulatory Practices

PAGCOR's accreditation regime for gaming affiliates and service providers aligns with broader global trends in gambling regulation. Around the world, regulators are increasingly extending oversight to all participants in the gaming supply chain, not just the front-end operators. The rationale is that effective regulation must encompass game developers, payment processors, marketing affiliates, and other B2B vendors to ensure end-to-end integrity of the industry.

Notably, PAGCOR's creation of distinct categories (Gaming Affiliate, Support Service Provider, Gaming System Administrator, etc.) mirrors efforts in other jurisdictions to clearly define and license each role in the online gaming ecosystem. The re-classification of the former “Gaming System Service Providers” as Gaming System Administrators (GSAs) under the new framework is one example of aligning nomenclature with functional oversight. Likewise, the requirement of probity checks and financial guarantees (like the Performance Cash Deposit) for B2B licensees is consistent with measures imposed by regulators in mature gaming markets to ensure only suitable and solvent companies participate in the industry. By implementing a formal accreditation scheme, PAGCOR is effectively elevating

its regulatory regime to meet international standards of due diligence and risk management for gaming suppliers.

This alignment with global practices also serves to boost the credibility of the Philippine gaming sector. Stakeholders have noted that bringing service providers into the regulatory fold will improve industry transparency, prevent “bad actors” from infiltrating the market, and enhance the overall reputation of Philippine e-gaming operations. In the long run, PAGCOR’s B2B accreditation requirements should foster greater investor confidence and facilitate partnerships with foreign firms, as the regulatory environment now demands the same level of compliance from service providers as is expected in advanced jurisdictions. The move underscores PAGCOR’s commitment to a transparent, accountable, and internationally respected gaming industry. By holding gaming affiliates and support services to global benchmarks, the Philippines is positioning its gaming regulatory framework on par with those of other leading markets, thereby encouraging a more stable and responsible growth of the sector.

Sources: PAGCOR, *Regulatory Framework for the Accreditation of Gaming Affiliates and Support Service Providers* (Rev. 1, effective 02 Oct 2025); PAGCOR Memorandum *Transition Guidelines for Existing B2B Providers & Implementation of Regulatory Frameworks* (Oct. 2025);