



20<sup>th</sup> December 2023

The National Ordinance for Games of Chance (LOK) has been officially submitted to Parliament and the Minister of Finance has initiated a sequence of procedures to facilitate a seamless transition from the existing framework to the new system upon the law's enactment.

### Licenses under the new framework (issued by NOOGH and the LOK)

All licenses and license holders will be granted under the same rights and conditions. There is flexibility as to the corporate and license structure entities can set up with regard to their individual operations.

- Any account can have one or more licenses.
- Any UBO(s) can have one or more accounts.
- Any license can have unlimited domains.

### Prospective renewal of Current Gaming Licenses (Master Licensees)

From this point forward, there will be no new extensions or renewals of Master Licenses. Master Licensors will only be able to continue to operate and permit sublicensees to do so until current renewals expire, or LOK come into force, whichever happens first. On the passing of LOK or when there are no less 12 weeks of the current renewal remaining, again which ever happens first, the Master Licensor must promptly notify the GCB which sublicensees remain contracted to it. After this time Master Licensors should they wish to continue operations in their own right will need to wait until LOK is implemented and apply for a license then.

### 1<sup>st</sup> January

- All license holders under the NOOGH will be allowed to use a new Digital Seal on domains of their websites. This Digital Seal will be issued by the GCB.
- In addition, the GCB has the discretion to permit operators in contractual arrangements with license holders (the sublicensees) with license applicants in progress, that have satisfied the due diligence required by the GCB to offer the same Digital Seal.

A Digital Seal Policy will shortly be issued by the GCB and will require operators to include the “token” associated with each domain registered on the GCB portal to be inserted into the websites’ DNS.

License holders will be responsible for actively monitoring their sub-licenses to ensure they do not employ a variant of the official Digital Seal without enforcement. The GCB will take enforcement measures against license holders found to be in violation of this policy.

## 31<sup>st</sup> March 2024

Registration of sublicense on the GCB portal and the subsequent application for direct licenses of those sublicense operators will no longer be possible after the 31<sup>st</sup> March 2024.

The following are the scenarios based on sublicense registration and NOOGH license applications from this date.

	Sublicense and domains registered on GCB portal	Sublicense and domains not registered on GCB portal
Application in progress on the GCB portal or license issued by the GCB under NOOGH	<p>Operations continue uninterrupted under sublicense agreement until direct license is issued.</p> <p>Direct license if held at the time of the LOK coming into force will be grandfathered into the new framework as a provisional license without any interruption of business operations.</p> <p>Applications in progress will continue under the LOK framework and sublicense operations can continue uninterrupted.</p>	N/A
No application in progress on the GCB portal and/or license issued by the GCB under NOOGH	<p>Continue operations under current agreement with Master License holder until expiry ceases or LOK comes into force, whichever is first.</p> <p>Any subsequent application to be made will be treated as a new application and not “grandfathered” at changeover from NOOGH to LOK giving rise to a risk of temporary interruption to operations in-between licenses.</p>	<p>Immediately cease operations under any sublicense contractual agreement from this date.</p> <p>Any application to be made will be a new application and not “grandfathered” at changeover from NOOGH to LOK giving rise to a risk of temporary interruption to operations in-between licenses.</p>

- Any license application from a brand new entity/applicant (i.e. not under any existing license or sublicense) under NOOGH will be processed under NOOGH, and if not yet completed at the point the LOK comes into force will have the same status as sublicensees.
- Current “sublicense” holders who receive a new direct license under the NOOGH will have their business operations transferred immediately to the GCB regulatory system and be subject to the license conditions. Any existing contractual arrangement with the master license holder is the responsibility of the two parties to that agreement without interference by the GCB.

## Definitions

GCB – Curacao’s Gaming Control Board

GCB Portal - <https://portal.gamingcontrolcuracao.org/>

LOK – Incoming legislation: National Ordinance for Games of Chance

NOOGH – Current legislation: National Ordinance on Offshore Games of Hazard