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How-to-Crypto policy

Curaçao Gaming Authority (CGA)

Introduction

How-to-Crypto policy

The Curaçao Gaming Authority (CGA) has issued comprehensive Crypto policy guidelines for all operators, with full compliance required by June 2027. In this how-to guide, we explain what is expected from operators and how we can support you.

New rules for crypto

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Here is what THE NEW RULES require from operators:

- Mandatory blockchain analytics
- Full wallet segregation
- Prohibited and high-risk assets
- Crypto policy to be submitted to CGA within 3 months
- Full compliance with policy by June 2027.

Further rules

Operators may only accept crypto for gambling, not act as exchanges, custodians, or virtual asset service providers (VASP). The CGA has given positive approval for fiat-backed stable coins while suggesting extensive risk assessment for privacy coins, meme coins and wrapped tokens for continued usage.

In addition, any third-party VASP contracted by the operator must be regulated, registered, and screened, and must demonstrate appropriate anti-money laundering and countering the financing of terrorism AML/CFT controls.

Pooled/unhosted wallets are allowed to be used provided that extensive due diligence to verify ownership and transaction monitoring to view origin/destination of funds is performed. Additionally, player funds and operational cryptocurrencies must be segregated, and wallets linked to Ultimate Beneficial Owners (UBOs) are prohibited.

Phased implementation

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The CGA introduces a phased implementation for this Crypto policy. Following the publishing of the policy, the CGA expects operators to immediately implement and adapt controls, including the prohibition to onboard sanctioned wallets/mixers, prohibitions on personal and UBO linked wallets and prohibitions of operators acting as exchange, payment providers and VASP.

Furthermore, the CGA expects all operators to submit their Crypto policy by September 2026 in line with policy requirements, including a clear timeline of adoption/compliance outlined therein.

July 31st 2026
EM Group submission deadline

- Inform EM Group if they will draft your Cryptocurrency policy
- Define if you will do it internally
- Coordinate timely delivery

September 2026
Cryptocurrency Policy delivery

- All operators must submit their policy to the CGA
- Must include policy Requirements
- Clear adoption and compliance timeline

December 2026
Cryptocurrency Policy delivery

- Documented crypto risk assessments
- VASP due diligence completed
- Active wallet ownership controls

June 2027
Full compliance

- Operators 100% with the policy
- All controls adopted
- Records readys for audit

By December 2026, operators must apply and complete documented crypto risk assessments, VASP due diligence and wallet ownership controls.

Finally, by June 2027, the CGA expects operators to be fully in compliance with the Crypto policy and have adopted the necessary controls outlined therein, including audit-ready records.

TO DO

We understand that these requirements may require some operational adjustments. If you have any additional questions, a call can be arranged with your account manager and a member of our dedicated iGaming compliance team to provide further support.

The Crypto policy must be submitted to the CGA before the end of September 2026. Should you wish, EM Group can draft and revise your Crypto policy to ensure it adheres to the policy guideline. Alternatively, you may update the Crypto policy internally and submit it to your account manager at EM Group for review by EM Group's legal and compliance team. Whichever option you prefer, kindly inform us by July 31st, 2026 so that the necessary arrangements can be made to ensure timely submission. option you prefer, kindly inform us by July 31st, 2026 so that the necessary arrangements can be made to ensure timely submission.