20 November 2026

Follow-up regarding Supplier License and Registration Requirements under the National Ordinance on Games of Chance (LOK)

Pursuant to Article 1.5, paragraph 1, LOK, suppliers established in Curaçao are prohibited from providing critical services or goods without a supplier license issued by the CGA.

Furthermore, pursuant to Article 5.16, paragraph 1, LOK, the CGA maintains a public register of suppliers providing critical services or goods to holders of its remote gaming licenses. Suppliers providing such services or goods are required to be registered in this register, regardless of whether they are established in or outside Curaçao. In this regard, Article 5.16, paragraph 4, LOK prohibits holders of a gaming license issued by the CGA from obtaining critical services or goods from suppliers that are not registered.

The LOK provides for a transitional period of two (2) years from its entry into force to allow sufficient time to ensure compliance with the above-mentioned obligations. This means that these obligations will take effect on December 24, 2026.

However, due to the recent incident involving the CGA's online gaming portal and the subsequent transition to a new interim online gaming portal, the CGA has experienced delays in the processing of B2B supplier license applications and the implementation of the supplier registration portal. In view of these circumstances, the CGA will take these delays into account in relation to the enforcement of the above-mentioned obligations. To this end, the CGA will proceed on the basis of the following considerations:

1. With respect to suppliers established in Curaçao that provide critical services or goods and that submitted a supplier license application before the online gaming portal went offline on September 25, 2026, but have not yet been granted a license by December 24, 2026, the CGA will, until further notice, generally refrain from taking enforcement action in relation to Article 1.5, paragraph 1, LOK.
2. With respect to the registration requirement under Article 5.16, paragraph 4, LOK, the CGA will take into account the delays in the implementation of the supplier registration

portal, as a result of which the relevant suppliers have not yet been able to complete their registration. Accordingly, the CGA will, until further notice, generally refrain from taking enforcement action in relation to Article 5.16, paragraph 4, of the LOK.

The CGA will provide further information as soon as possible on when enforcement of these requirements can be expected.

Under the CGA's current policy framework, suppliers considered to provide critical services or goods include, inter alia, RNG game manufacturers, live dealer studio providers, poker and other peer-to-peer software suppliers, lottery providers, sportsbook software suppliers, bet capture and settlement providers, sports betting line or odds providers, and aggregators. Please note that these categories may be expanded by the CGA from time to time.

Further information regarding the supplier registration process will be provided in due course.

Finally, for the avoidance of doubt, the supplier licensing requirement under Article 1.5, paragraph 1, LOK only applies to suppliers established in Curaçao. Suppliers established outside of Curaçao may continue to provide such services or goods without a Curaçao supplier license, provided that they are duly registered in accordance with the applicable requirements, and without prejudice to the authority of the CGA to impose conditions and requirements with respect to the engagement of suppliers by license holders.