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United Arab Emirates
Gambling Law

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This country-specific Q&A provides an overview of gambling laws and regulations applicable in United Arab Emirates.

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United Arab Emirates: Gambling Law

1. What is the legal definition of gambling?

The United Arab Emirates ("UAE") framework purposefully adopts the term "commercial gaming" which is defined as:

> a. Games of chance and/or skill; and where
>
> b. An amount of money is placed as a bet for the purpose of winning an amount of money.

This includes:

- Any game conducted at a land-based Gaming Facility (for example, slot machines, table games including blackjack, roulette, baccarat, craps, poker etc.)
- Lottery (for example, where a player pays an amount of money for a ticket or bets for a ticket, which provides the player with a chance or opportunity to win a prize(s))
- Internet Gaming (e.g. commercial gaming provided via the internet, on a computer / mobile / other digital device and within the UAE)
- Sports Wagering

Additionally, Article 460 of Federal Law by Decree No. (31) of 2021 Promulgating the Crimes and Penalties Law (the "UAE Penal Code") defines gambling as: "a game whereby each of the parties thereto agrees – in case of losing – to pay to the winner a certain sum of money or any other thing agreed upon."

2. What legislation applies to gambling? Please provide a summary of the legal/regulatory framework.

UAE landscape

The seven emirates of the UAE are Abu Dhabi, Ajman, Dubai, Fujairah, Ras Al Khaimah, Sharjah and Umm Al Quwain. The UAE is a federation of self-governing emirates that formed in 1971, with Ras Al Khaimah joining in 1972. Abu Dhabi, the largest emirate, is home to the UAE's capital city and is the political centre of the federation.

Each emirate is governed by its Local Ruler and has significant autonomy, although all operate within a broader federal UAE framework. Together, the Local Rulers form the Supreme Council of Rulers, the highest federal authority in the UAE.

The UAE has over 40 free zones, each designed to attract foreign investment by offering 100% foreign ownership, tax incentives and other privileges. Each free zone caters to specific industries or business activities, and has its own benefits and setup costs. At the time of writing, there are no free zones dedicated exclusively for commercial gaming; however, there are several that are supportive of the gaming industry.

The UAE has emerged as a global hub for trade, tourism and business, and arguably one of the most exciting gambling markets, strategically located within an eight-hour flight of two thirds of the global population, acting as a modern crossroads connecting East and West.

From a federal policy perspective, one of the UAE's strategic initiatives is to reduce the country's dependence on oil and transform it into a diversified economy.

Regulating commercial gaming

The UAE is the first Gulf country to regulate commercial gaming. It remains a society rooted in Islamic values, and those cultural and religious sensitivities naturally shape the pace and explain why the regime is gated.

The strategy of the General Commercial Gaming Regulatory Authority ("GCGRA"), located in Abu Dhabi, rests on four pillars:

- world-class excellence
- safety and responsibility
- innovation
- value for the UAE

In a 2026 policy paper titled "Commercial Gaming Policy", the GCGRA is described as "not only a regulator but also a key enabler of national transformation". Its mandate includes economic diversification, developing human capital and supporting social cohesion.

Importantly, this represents a controlled, selective liberalisation, delivered through close partnership between government and carefully chosen partners.

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Legal framework

The GCGRA website lists the key federal laws governing, directly and indirectly, commercial gaming in the UAE.

The federal legislation legalising and regulating commercial gaming is not publicly available.

The detailed gambling legal framework (known as the "Executive Regulations"), which creates the GCGRA and sets out its authorities, key definitions, types of licences, licensing requirements and supervision, is available from the GCGRA but is not published online. At the time of writing, the Executive Regulations are made available to applicants once they are given access to the GCGRA licensing portal (the "Licensing Portal").

Regulatory framework

The federal framework enables each emirate to manage commercial gaming within its jurisdiction (including whether to opt in) and set its own timeline for implementation.

The UAE market is underpinned by a single-Operator-per-emirate model for each vertical, with the exception of the Lottery Operator, which holds a single national licence. Market entry for a B2C is therefore restricted and deliberately limited. The framework is reported to allow up to one land-based (Gaming Facility Operator) and one online Internet Gaming Operator per emirate, with each emirate being able to decide whether to opt in.

An approval from a Local Ruler is a minimum threshold requirement for a B2C, followed by the establishment of, or partnership with, a Qualified Domestic Entity, which must be the applicant company.

In common with many modern gaming regulators, the GCGRA applies a risk-based approach to regulation. The regime is underpinned by the principles of suitability, the non-transferability of licences, the revocability of licences, responsible gaming and financial crime prevention.

3. Which body/ies regulate gambling?

The GCGRA, based in Abu Dhabi, is the single federal regulator, established in September 2023 with exclusive jurisdiction to license, regulate and supervise all commercial gaming in the UAE. It also acts as the competent authority to regulate and oversee financial crime prevention within the commercial gaming industry in the UAE.

At the time of writing, Ras Al Khaimah is the only emirate to have created its own regulator (Ras Al Khaimah Tourism Development Authority) for commercial gaming, likely reflecting its position as the first emirate to host an integrated resort, Wynn Al Marjan Island.

Under the federal AML framework, the GCGRA is also the designated supervisory authority for commercial gaming operators (see question 12).

4. Are licences available? If so: a) What is the duration of a licence? b) What types of licences are available? c) Are there different types of licences for B2C and B2B operators? d) Do software suppliers need to be licensed?

Licences are available but, as noted in question 2, the UAE is a limited market by design.

a. What is the duration of a licence?

The duration depends on the type of licence.

Gaming Facility Operator licences are granted for an initial term of 15 years.

Internet Gaming Operator and Sports Wagering Operator licences are granted for an initial term of 10 years.

Gaming-Related Vendor, Key Person and Occupational licences are not granted for a fixed term.

b. What types of licences are available?

Category	*Covers*
Operator – Gaming Facility	Land-based casino/gaming facility (one per emirate, reportedly)
Operator – Lottery; Lottery Retailer	The single national lottery and its retail sales points
Operator – Internet Gaming	Online casino, bingo, peer-to-peer, eSports, fantasy and skill games delivered to devices in the UAE
Operator – Sports Wagering	Fixed-odds and other event wagering
Gaming-Related Vendor	Suppliers of gaming equipment, goods, services and technology
Certified Service Providers	Providers of independent testing, auditing and certification services
Key Person – Corporate	Controllers (15%+), affiliates and management services providers of applicants/licensees
Key Person – Individual	Directors, executive officers and individual controllers
Gaming Employee – Level 1 / Level 2	Supervisory (L1) and non-supervisory (L2) staff involved in gaming operations

c. Are there different types of licences for B2C and B2B operators?

B2C licences

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A B2C activity requires a type of Operator licence. Please see questions 2, 4a and 4b.

At the time of writing, we understand that Sports Wagering licences are only available to Internet Gaming licensees.

B2B licences

A B2B activity requires a Gaming-Related Vendor licence. At the time of writing, B2Bs are not required to be, or to partner with, a Qualified Domestic Entity.

Independent testing, auditing and certification services are separately licensed as Certified Service Providers.

d. Do software suppliers need to be licensed?

Yes. Platform, content, data, geolocation and payment suppliers must hold Gaming-Related Vendor licences.

5. Are any types of gambling products prohibited?

No product category is expressly prohibited in the framework. However, a product can only be offered in an emirate that has opted in to commercial gaming.

The GCGRA decides in its sole discretion whether a product is licensable.

6. What is the headline application procedure? Please include any eligibility and other application requirements, including approximate application costs and any need to establish a local presence.

Procedure

Applications run through a multi-staged process.

An applicant must first notify the GCGRA of its intention to apply by filling out an Intake Form. This requires the disclosure of basic information – including the type of licence(s), company name, key people, group structure and scope of business – which will be screened and assessed by the GCGRA to establish whether an applicant is eligible to apply. Only once an applicant is considered eligible will it be granted access to the Licensing Portal, where the full application and supporting documentation (including business plan and compliance strategies) are submitted.

The Licensing Portal includes GCGRA guidelines and specific requirements for each type of licence. The supporting documents required will include:

a. Business information b. Corporate documentation c. Group corporate structure with all related business entities d. Description of business activities e. Directors and officers information f. Financial information, including financial accounts g. Qualified Domestic Entity details (for Operators / B2Cs) h. Details of Key Persons i. Third-party details, including legal advisors, auditors and accountants j. Information on the applicant's legal history (statutory, regulatory, financial, criminal, political) k. Overview of the responsible gaming plan to be put in place

Group licences are available authorising the activities of multiple companies, subject to meeting the GCGRA's requirements.

Eligibility

It is an applicant's responsibility to demonstrate to the GCGRA through “clear and convincing evidence” that it is “eligible, qualified and suitable to be granted and retain” a licence.

Application cost

Application fees are not published.

Local presence

Operators (i.e. B2Cs) must establish or partner with a Qualified Domestic Entity, which is defined in the Executive Regulations.

At the time of writing, Gaming-Related Vendors do not need a local presence, including a local company, local servers or partnering with a Qualified Domestic Entity. This may change in the future.

Assessment

When assessing applications, the GCGRA's “objective is to guarantee that all commercial gaming operations in the UAE are managed by competent individuals, uphold socially responsible gaming, and facilitate unlocking the economic potential of commercial gaming responsibly."

7. Do individuals within the business need to be personally licensed or authorised? If so, please provide headline requirements.

Personal applications

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Directors, executive officers (CEO, CFO, COO or equivalent) and individual controllers of an applicant or licensee must be found suitable and licensed as Key Persons (Individual). A controller is anyone holding, or entitled to acquire, directly or indirectly, 15% or more of the economic or voting rights, or able to appoint or remove a majority of the board. The GCGRA may designate any other individual with influence over the licensee as a Key Person.

Gaming Employee Level 1 occupational licences cover supervisory roles; Level 2 covers non-supervisory staff directly or indirectly involved in gaming operations. Requirements scale with the individual's access to, and influence over, gaming operations.

Headline requirements

Applicants must provide personal history disclosure covering identity, employment, criminal, financial and political exposure; undergo fingerprinting and background checks; and satisfy a fitness and probity assessment based on integrity, financial standing and competence. Licensees have a continuing duty to notify material changes (financial standing, criminal record, suitability) and to cooperate fully with investigations.

8. Is advertising of gambling permitted and, if permitted, how is it regulated?

Advertising is permitted, subject to the GCGRA's advertising standards. Social media promotion additionally requires an advertiser permit from the UAE Media Council.

The GCGRA imposes strict advertising standards on licensees, including:

a) Use of Arabic is prohibited; b) Use of Emirati or Islamic cultural symbols is prohibited; c) Advertising directed at or appealing to underage individuals is prohibited; d) Age verification is required to minimise underage exposure (18 for lottery; 21 for other commercial gaming); e) Direct marketing must include responsible gaming language and prohibition of underage gaming; f) Direct marketing, including via social media, requires prior consent in the form of a tick box or confirmation message (pre-ticked boxes or assumed consent is prohibited); g) Clear opt-out methods must be provided and operators must act on opt-out requests within 48 hours; h) Self-excluded players and involuntarily excluded players must not receive direct marketing; i) Advertising must not air during programmes appealing to underage audiences; j) Operators are responsible for third parties' compliance with advertising standards and annual reporting on their management is required; k) Terms and conditions for promotions must be clearly communicated.

9. Are marketing affiliates permitted? If so, are they licensed or regulated?

Marketing affiliates are permitted when working with a GCGRA licensee.

At the time of writing, they are not separately licensed, but they are regulated indirectly: licensees remain responsible for their affiliates' compliance with the advertising standards and must report annually on their management of third parties (see question 8). This may change in the future with the GCGRA deciding to license affiliates.

10. What are the penalties for offering, facilitating or marketing unlawful gambling, and can the gambler be penalised for participating in unlawful gambling?

Outside the GCGRA licensing regime, gambling remains illegal in the UAE. It is expressly prohibited under Articles 460-463 of the UAE Penal Code and is also forbidden under the UAE Federal Constitution.

Under the UAE Penal Code, gambling is a criminal offence for participants and organisers alike, with the law drawing a sharp distinction between the two. A person who gambles faces imprisonment for up to two years or a fine of up to AED 50,000 under Article 461. Where the gambling takes place in a public place, a venue open to the public, business premises, or a house set up for gambling, the setting is treated as an aggravating factor.

Those who facilitate gambling are dealt with far more severely: Article 462 provides that anyone who opens or runs a gambling venue and admits people to it, or who organises a gambling game in a public place or a place prepared for that purpose, is liable to temporary imprisonment of up to 10 years' together with a fine of not less than AED 100,000. In every case, Article 463 requires the court to seize and confiscate any money or tools used in the gambling and to order the closure of the premises, which may only reopen if designated for a lawful purpose and with the approval of the public prosecution.

The UAE Penal Code has extraterritorial effect, meaning these prohibitions apply even if the activities are conducted from outside the UAE.

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Additional safeguards are set out in Federal Decree Law No. (34) of 2021 on Countering Rumours and Cybercrimes which marked a change in the UAE's regulation of digital technologies, including combatting illegal online gambling. Under Article 38, anyone creating, operating or managing a website promoting illegal gambling may face imprisonment and a fine ranging between AED 250,000 to AED 500,000. The offence extends to publishing or transmitting material and using online platforms to promote or facilitate illegal gambling. Again, the legislation has extraterritorial effect.

In December 2024, the GCGRA warned advertisers, payment processors and other service providers supporting unlicensed operators that they may face sanctions.

It's also worth noting that pursuant to Article 1021 of the Civil Transactions Law, gambling debts are unenforceable.

11. Briefly detail key requirements for licensees, including ongoing payment and reporting requirements.

Key requirements – annual and periodic

- Annual fees must be paid.

In addition, Operators' key requirements include:

- Quarterly payment of a Royalty to the GCGRA, at a percentage determined by the type of licence.
- Annual responsible gaming progress report.
- Annual integrity and security assessment.
- Quarterly vulnerability scans.
- Submission of an Internal Control System for approval.
- Independent audit of the responsible gaming programme at least every two years by a GCGRA-approved auditor.
- Annual submission of a third-party marketing management policy for approval.
- Semi-annual internal reporting by the money laundering reporting officer ("MLRO") to the board.
- Annual Responsible Gaming Programme.

Key requirements – ongoing

In September 2025, the GCGRA published guidance summarising the continuing duties of all licence holders, pursuant to clause 3.4 of the Executive Regulations, to keep licence information current and remain suitable.

- Material changes: notify within 10 working days; changes affecting suitability must be reported "immediately".
- Events to report (within 10 working days): name or address/jurisdiction changes, change of control, bankruptcy, any arrest, charge or conviction (excluding minor traffic offences); regulatory inquiries or actions; any licence refusal, suspension, fine or settlement in any jurisdiction.
- Ongoing duties: maintain eligibility and suitability; supply requested information; cooperate with investigations; comply with all GCGRA conditions and orders; train staff to report promptly.
- Ongoing assessment: the GCGRA conducts daily sanctions screening, trigger-event reviews and annual reconfirmation/renewal reviews.
- How to report: licensing-notifications@gcgra.gov.ae

It is worth noting that individual licences may also include specific licence conditions relating to ongoing reporting requirements.

12. Briefly detail key anti-money laundering requirements.

Background

The UAE has a comprehensive and evolving AML/CTF framework, aligned with Financial Action Task Force ("FATF") recommendations and other international standards. It is worth noting that the UAE was on the FATF grey list between March 2022 and February 2024 and faces its next mutual evaluation cycle from 2026.

Operators are Designated Non-Financial Businesses and Professions ("DNFBPs") under the federal AML framework.

Requirements

- Enterprise-wide ML/TF risk assessment and a risk-based programme approved at board level.
- Customer due diligence ("CDD") at onboarding and at the AED 11,000 threshold, including cumulative deposits and withdrawals through a verified player account; enhanced due diligence, source of funds and wealth checks

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and senior management approval for politically exposed persons and high-risk players; refusal where CDD cannot be completed.
- A compliance officer / MLRO at management level with independence and authority; the GCGRA policy paper expects the MLRO to be of suitable seniority, UAE-resident and reporting to the board at least semi-annually.
- Suspicious transaction reporting to the UAE Financial Intelligence Unit ("FIU") through the goAML platform without delay and regardless of value; tipping-off prohibited.
- Targeted financial sanctions screening against UN and UAE lists, freezing without delay and reporting within five working days.
- Record retention for at least five years from the transaction or end of the relationship.
- Transaction monitoring tailored to gaming typologies: anonymous or third-party payments, chip or voucher purchases, multiple payment methods, VIP play, employee complicity; closed-loop withdrawals to the originating payment method; currency transaction reporting for cash above thresholds.
- Annual AML training and independent testing of the programme.

At the time of writing, we understand that amendments have been made to the Executive Regulations relating to AML.

13. Briefly detail key responsible gambling (or safer gambling) requirements.

The GCGRA has developed a Responsible Gaming Framework, dated May 2024, setting out its objectives and strategies to encourage responsible play and assist licensees to conduct operations responsibly. This is an outcome-based framework and covers the full player lifecycle from marketing to exclusion.

Operators are required to submit their Responsible Gaming Programme annually to the GCGRA.

Key requirements:

- Minimum age: 18 for lottery, 21 for all other forms of commercial gaming.
- Self-exclusion: The GCGRA administers a voluntary self-exclusion programme and distributes confidential lists to Operators, who must block accounts, refuse winnings, refund balances and report attempts to wager. Durations are fixed in the exclusion agreement with no early removal. Third-party exclusion and operator- or regulator-initiated (involuntary) exclusion are also recognised; licensed products in practice offer self-exclusion from six months to five years.
- Player management tools: Deposit limits by day, week and month, time and spend limits, session reminders, and cooling-off periods of at least 72 hours with no marketing or bonuses during the period.
- Harm minimisation: Monitoring of play for markers of harm, trained interaction, and referral to support.
- Marketing: No targeting of underage, excluded or vulnerable persons, no depiction of minors or educational settings, responsible gaming messaging and help resources in advertising (see question 8).
- Land-based: Facility-level measures (signage, ATM and credit controls, staff escalation) are expected in the programme.
- Staff training.

14. Briefly detail shareholder reporting and approval threshold(s).

Meaning of a controller

A controller is a "person" that exercises "control" over a "controlled entity".

Control includes the following:

- Holding or entitled to acquire, directly or indirectly, 15% or more of the economic rights – where "economic rights" means the rights to receive income, return of capital, distributions or other financial benefits.
- Holding or entitled to exercise, directly or indirectly, 15% or more of the voting rights – where "voting rights" means the rights to vote at general meetings or to appoint or remove members of its governing body.
- The power, directly or indirectly, to appoint or remove a majority of the members of the board of directors or equivalent by virtue of any contract, agreement, understanding or otherwise.

Change of control

A change of control ("CoC") requires "prior written approval" from the GCGRA. Pre-approval is required for

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the appointment of a new controller; the removal of an existing controller does not require pre-approval.

Approval of a CoC is at the sole discretion of the GCGRA (specifically, its Board) and such approval may be subject to conditions or restrictions as deemed appropriate.

If a CoC takes place without being pre-approved, this could result in suspension or revocation of the GCGRA licence.

Passive investors

We understand that the GCGRA has adopted a pragmatic policy position towards passive investors that broadly follows US principles. As part of a passive investor qualification, the GCGRA will consider consent rights, Board appointees and whether the investor controls the majority of the licensee Board.

15. Briefly detail the regulator's enforcement powers, including sanctions and common themes.

The GCGRA has a suite of enforcement tools including administrative fines, licence restrictions, suspension and revocation. At the time of writing, no enforcement action against a licensee has been made public, so no common themes have yet emerged.

On its website, the GCGRA states that the following "deviations may lead to administrative actions or penalties":

a) Violation of or failure to meet legal or regulatory requirements; b) Misrepresentation or significant omissions; c) Fraudulent activities; d) Non-cooperation with the GCGRA or its representatives; and e) Non-compliance with settlement agreements or GCGRA orders.

16. What is the tax rate?

Gaming tax is set per licence type and is not published.

Wynn Al Marjan is reported to pay 10-12% of GGR on a blended basis, and the UAE Lottery is reported to pay a single-digit percentage of GGR.

Federal corporate tax is 9% on taxable income above AED 375,000, with income below that threshold taxed at 0%. Qualified free zone companies are nil-rated on qualifying income.

VAT is 5%.

There is no personal tax on winnings.

17. Is cryptocurrency permitted for online gambling and, if permitted, how is it regulated?

No. At the time of writing, the GCGRA does not permit the use of cryptocurrency for commercial gaming.

18. Are there any proposals for changing gambling laws and regulations in the next 12-24 months? If so, please provide an overview of the proposed changes and likely timing.

The Executive Regulations are subject to amendment from time to time. The latest version was amended on 21 September 2023, which was before any licences were issued.

At the time of writing, no further amendments have been publicly proposed, although we expect the framework to evolve as the market moves into operation.

19. What key regulatory developments are proposed or on the horizon in the next 12-24 months?

The next two years will likely move the market from framework-building to operation. We expect:

- the first integrated resort to open in 2027;
- further emirates to decide whether to opt in to commercial gaming;
- the GCGRA to shift its focus from licensing and framework design towards supervision and enforcement;
- the supply chain to deepen; and
- new investments to be made.

Key developments to watch include the progression of the Fanatics-Momentum joint venture, which consolidated the UAE Lottery and Play971 in June 2026, the opening of Wynn Al Marjan Island in Ras Al Khaimah, scheduled for September 2027, and the announcement of the next integrated resort.

To date, there has been an intentional, phased build-out of the online market. It remains to be seen whether, and which, emirates will opt in next for Internet Gaming and Sports Wagering.

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20. Do you foresee any imminent risks to the growth of the gambling market in your jurisdiction?

In the short term, the regional conflict that began in early 2026 is the most imminent risk. However, the fundamentals of the market have held up and there has been minimal, if any, impact on the GCGRA, licensees and investments being made – most notably seen with Blackstone's investment in ADGT in March 2026 and the Fanatics-Momentum joint venture in June 2026.

As in any regulated market, the illegal market remains a risk. As the GCGRA matures, the focus will shift to the enforcement action it takes to disrupt the channels – payments, advertising and affiliates – through which unlicensed commercial gaming reaches UAE players. In December 2024, the GCGRA issued a Consumer Advisory Notice warning UAE residents of the dangers of playing with, or doing business with, unlicensed lottery and commercial gaming operators. Further, in October 2026, a joint UAE–South Korean taskforce made a number of arrests in the UAE, disrupting a USD 2.3 billion illegal gambling operation. Combating the illegal market will become even more important as the UAE prepares for the opening of Wynn Al Marjan Island.

21. If a gambling start-up was looking for a jurisdiction in which to commence its activities, why would it choose yours?

For a well-capitalised start-up, the UAE offers first-mover access to the Gulf's first and only regulated commercial gaming market. Given the one-Operator-per-emirate model and the need to partner with a Qualified Domestic Entity, the realistic entry point for a start-up is as a Gaming-Related Vendor, which (at the time of writing) requires no local presence.

The fundamentals are compelling: a high-income, roughly 88% expatriate population, roughly 20 million international visitors a year, 2.4 billion people within four hours' flight, and analyst estimates of USD 3–5 billion in annual GGR at maturity.

Although the regime is new, the GCGRA derives considerable credibility from the international gaming regulatory experience of its Board members and senior leadership team.

The UAE offers an attractive tax regime, with 9% corporate tax (over AED 375,000), nil-rating of qualifying income for qualified free zone companies and no personal income tax.

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