

Getting ready for the opening of iGaming in Ontario

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Compliance requirements for iGaming in Ontario

As iGaming Ontario (iGO), a subsidiary of the Alcohol and Gaming Commission of Ontario (AGCO), gets closer to accepting applications for Internet gaming (igaming) entities that wish to participate in the new legal and regulated igaming scheme in Ontario, there are key compliance requirements that participants should be mindful of.

Registrar's Standard for Internet Gaming

Gaming operators and gaming-related suppliers participating in the igaming scheme in Ontario will need to comply with the [Registrar's Standards for Internet Gaming](#), the final version of which was released on September 9, 2021.

The following restrictions and ongoing obligations in such standards are worth noting:

- Section 1.21: "Operators must ensure that no independent third parties that engage in direct-to-consumer marketing, direct-to-consumer promotion, or player referral services for the Operator under contract, in exchange for commissions, or for any other form of compensation also undertake such activities related to online gaming sites that facilitate or accept wagers from players in Ontario without an AGCO registration."
- Section 2.05: "Advertising and marketing materials that communicate gambling inducements, bonuses and credits are prohibited, except on an operator's gaming site and through direct advertising and marketing, after receiving active player consent."
- Section 2.10: "A mechanism shall be in place to monitor player risk profiles and behaviours for the purpose of detecting signs of players potentially experiencing harm."
- Section 2.13: "Individuals shall have the option to take a break in play, in addition to a formal self-exclusion program."
- Section 2.16: "Game designs and features shall help to prevent extended, continuous, and impulsive play and facilitate low risk play behaviours."
- Section 2.17: "The gaming system must not offer functionality which facilitates playing multiple slots games at the same time. This includes, but is not limited to, split screen or multi-screen functionality."

Anti-Money Laundering (AML) Program

In addition to the Registrar's Standards for Internet Gaming, igaming operators will also be required to comply with iGO's AML Policy and Operational Guidance. In support of such compliance, igaming operators will be required to maintain internal AML operating procedures that comply with Canadian regulatory requirements. Among a host of other requirements, these will include:

- know your client requirements, including identification requirements.
- AML reporting requirements, including reporting on politically exposed persons, suspicious transactions, and prohibited players.
- igaming operator system requirements.

Recently, iGO released its AML Program document to further guide and inform igaming operators with respect to iGO's AML Program requirements. Prospective igaming operators can access this AML Program document through the iGO's engagement site, after entering into a Non-Disclosure Agreement with iGO.

Internet Gaming Operator Application Guide

If you are interested in registering as an igaming operator in Ontario, AGCO has released the [Internet Gaming Operator Application Guide](#) to assist prospective igaming operators apply for registration.

Of note are the requirements with respect to submission of the Registrar's Standards Gap Analysis and the Control Activity Matrix. In addition, prospective igaming operators in Ontario should note that, as part of becoming a registered igaming operator in Ontario, a technology attestation (attesting that the technology used complies with AGCO's standards and requirements) and operator competency demonstration (demonstrating to the AGCO that controls have been established to address compliance with the Registrar's Standard for Internet Gaming) will also be required.

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