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Canada
Gambling Law

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

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Canada: Gambling Law

1. What is the legal definition of gambling?

Canadian law has no single statutory definition of 'gambling'. Gambling is instead regulated through the prohibitions on gaming, betting and lotteries in Part VII of the *Criminal Code*, RSC 1985, c C-46, and through the terms defined in that Part. Section 197(1) defines a 'game' as 'a game of chance or mixed chance and skill', and a 'bet' as a bet placed on any contingency or event that is to take place in or out of Canada, including a contingency relating to a horse race, fight, match or sporting event. Section 206(1) creates a range of offences relating to lotteries and games of chance, including schemes involving the disposal of property by chance and certain games of chance or mixed chance and skill.

Section 207(4) defines a 'lottery scheme' by reference to the games and schemes described in s 206(1)(a) to (g), subject to the exclusions and qualifications set out in that subsection. Section 207(1) then establishes circumstances in which specified persons or entities may lawfully conduct and manage lottery schemes in accordance with provincial law.

In practice, regulators have expressed support for the common law formulation which indicates gambling requires three elements: consideration (the participant pays or stakes something of value), chance (the outcome depends in whole or in part on chance) and a prize. That formulation is useful as a general shorthand, but it is not a single statutory test under Canadian law. The applicable analysis depends on the particular *Criminal Code* provision engaged, including whether an activity constitutes a 'game' involving chance or mixed chance and skill. Promotional contests are commonly structured to remove at least one of these elements, for example by offering a free method of entry or requiring a skill-testing question.

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

Gambling is primarily a matter of federal criminal law. Part VII of the *Criminal Code* (ss 197 to 209) sets out the gaming and betting offences and the exemptions from them. The key provisions are:

- s 197 (definitions, including 'bet', 'common gaming house', 'common betting house' and 'game');
- s 201 (keeping a common gaming house or common betting house, and being found in one);
- s 202 (bookmaking, pool selling, recording or registering bets, transmitting betting information and advertising inducements to bet);
- s 203 (placing bets on behalf of others for consideration);
- s 204 (the exemption for pari-mutuel betting on horse races, supervised federally through the Canadian Pari-Mutuel Agency (CPMA) under the *Pari-Mutuel Betting Supervision Regulations*, SOR/91-365);
- s 206 (lotteries and games of chance, including the offence of advertising a scheme for disposing of property by chance);
- s 207 (the 'permitted lotteries' exemption, discussed below);
- s 207.1 (lottery schemes on international cruise ships); and
- s 209 (cheating at play).

Section 207(1)(a) makes it lawful 'for the government of a province, either alone or in conjunction with the government of another province, to conduct and manage a lottery scheme in that province, or in that and the other province, in accordance with any law enacted by the legislature of that province'. Section 207 also allows charitable and religious organisations, fairs and exhibitions and certain others to conduct and manage lottery schemes under a provincial licence, although, for the purposes of s 207(1)(b) to (f), only a province may conduct and manage a lottery scheme operated on or through a computer, video device, slot machine or dice game (s 207(4)(c)). Section 207(1)(g) permits any person to do anything in the province that is required for the conduct, management or operation of a lawful lottery scheme. This is the basis on which private suppliers, and in Ontario and Alberta private operators operating pursuant to an agreement with the relevant regulator, take part in schemes that the provincial entity conducts and manages.

Until August 27, 2021, the definition of 'lottery scheme' excluded betting on a single sport event. The *Safe and*

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Regulated Sports Betting Act, SC 2021, c 20 amended s 207(4)(b) so that the exclusion now covers only bookmaking, pool selling and the making or recording of bets on horse races, which allows provinces to offer single-event sports betting.

Provincial legislation establishes the provincial framework through which the province exercises its authority under s 207(1)(a). It establishes the provincial entity that regulates gaming activity and requires the private operators and suppliers that support the provincial scheme to register. It also sets standards for how they operate and adds provincial offences and administrative penalties. The main provincial statutes include:

- Ontario: *Gaming Control Act, 1992*, SO 1992, c 24 and O Reg 78/12; the *Alcohol and Gaming Commission of Ontario Act, 2019*, SO 2019, c 15, Sch 1; the *Ontario Lottery and Gaming Corporation Act, 1999*, SO 1999, c 12, Sch L; and the *iGaming Ontario Act, 2024*, SO 2024, c 20, Sch 9.
- Alberta: *Gaming, Liquor and Cannabis Act*, RSA 2000, c G-1 and the *Gaming, Liquor and Cannabis Regulation*, Alta Reg 143/1996; and the *iGaming Alberta Act*, SA 2025, c I-0.2.
- British Columbia: *Gaming Control Act*, SBC 2022, c 29, in force April 13, 2026, with the *Gaming Control Regulation*, BC Reg 209/2025 and the *Gaming Services and Gaming Work Regulation*, BC Reg 212/2025.
- Quebec: *Act respecting the Société des loteries du Québec*, CQLR c S-13.1; and the *Act respecting lotteries and amusement machines*, CQLR c L-6.

The other provinces have comparable legislation. Federal statutes of general application also apply, including the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*, SC 2000, c 17 (PCMLTFA), the *Competition Act*, RSC 1985, c C-34, and Canada's anti-spam legislation, SC 2010, c 23 (CASL).

Ontario and Alberta are currently the only provinces with online markets in which private operators contract with a provincial entity to offer online casino and sportsbook products directed to players. Elsewhere, regulated online gambling is available only through the provincial lottery corporations. Operators that offer online gambling to Canadians without provincial authorisation may be exposed to liability under the *Criminal Code*, although enforcement against offshore operators has historically been limited.

3. Which body/ies regulate gambling?

Gambling is regulated at the provincial level. The provinces generally separate the conduct-and-management function from the regulatory function, although the institutional structure varies considerably by province. The bodies are as follows:

Province	Regulator	Conduct and manage	Online offering
British Columbia	Independent Gambling Control Office (IGCO), which replaced the Gaming Policy and Enforcement Branch (GPEB) on April 13, 2026	British Columbia Lottery Corporation (BCLC)	PlayNow.com
Alberta	Alberta Gaming, Liquor and Cannabis (AGLC)	AGLC (land-based gaming and PlayAlberta.ca); Alberta iGaming Corporation (AiGC) (competitive online market)	PlayAlberta.ca and registered private operators
Saskatchewan	Saskatchewan Liquor and Gaming Authority (SLGA)	Lotteries and Gaming Saskatchewan (LGS)	PlayNow Saskatchewan, operated by the Saskatchewan Indian Gaming Authority (SIGA)
Manitoba	Liquor, Gaming and Cannabis Authority of Manitoba (LGCA)	Manitoba Liquor & Lotteries (MBLL)	PlayNow.com
Ontario	Alcohol and Gaming Commission of Ontario (AGCO)	Ontario Lottery and Gaming Corporation (OLG); iGaming Ontario (iGO) (competitive online market)	PlayOLG.ca and registered private operators
Quebec	Régie des alcools, des courses et des jeux (RACJ) (certain gaming and amusement machines)	Loto-Québec	Loto-Québec's online platform
New Brunswick	Gaming Control Branch, Department of Justice and Public Safety	New Brunswick Lotteries and Gaming Corporation (NBLGC), with lottery schemes operated by the Atlantic Lottery Corporation (ALC)	ALC.ca
Nova Scotia	Alcohol and Gaming Division, with appeals to the Nova Scotia Regulatory and Appeals Board	Nova Scotia Gaming Corporation, through ALC	ALC.ca
Prince Edward Island	Prince Edward Island Lotteries Commission	Prince Edward Island Lotteries Commission, which has delegated operations to ALC	ALC.ca
Newfoundland and Labrador	Department of Government Services (charitable lottery licensing)	Province, through ALC	ALC.ca
Yukon, Northwest Territories, Nunavut	Territorial governments	Territorial governments, with lottery products supplied through the Western Canada Lottery Corporation (WCLC), in which the three territories participate as associate members. None of the three territories has a territorial regime for licensing private online gambling operators.	Limited

iGO and the AiGC are provincial entities through which their respective provinces conduct and manage online lottery schemes in that province. Private operators participate in those schemes under agreements with iGO or the AiGC and subject to provincial registration and regulatory requirements. iGO was established in July 2021 as a subsidiary of the AGCO and became an independent agency in May 2025 under the *iGaming Ontario Act, 2024*, which continues iGO as a corporation whose objects include conducting and managing online lottery schemes (ss 3(1) and 4(1)). The AiGC was

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established by s 2 of the *iGaming Alberta Act*, with a mandate 'to develop, undertake, organize, conduct and manage online lottery schemes on behalf of the Government of Alberta'. Private operators contract with iGO or the AiGC, while the AGCO and the AGLC register them and supervise their compliance.

At the federal level, the CPMA supervises pari-mutuel betting on horse races, the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) supervises compliance with the PCMLTFA, and the Competition Bureau enforces the deceptive marketing provisions of the *Competition Act*.

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?

Yes. Ontario and Alberta currently have the only provincial regulatory regimes under which private operators can offer online gaming directly to consumers. Because the provinces must conduct and manage most forms of gaming, private operators in those provinces must be registered with the provincial regulator (the AGCO or the AGLC) and must also enter into an operating or commercial agreement with the provincial conduct-and-management entity (iGO or the AiGC). Such arrangements are not licenses in the traditional sense, in that the operators are not providing the services independently, but rather on behalf of the conduct and management entities, which retain exclusive authority under the *Criminal Code* over the conduct and management of such lottery schemes.

In the other provinces, private businesses may be registered or licensed in connection with the gaming supply chain, including as suppliers to provincial lottery or gaming entities, but there is no comparable provincial regime under which operators may provide services to the public on a B2C basis.

a. What is the duration of a licence?

Registration terms vary by province. In Alberta, a registration has a term of one or two years (*Gaming, Liquor and Cannabis Regulation*, s 29), and operators pay an annual registration fee for each iGaming site. In Ontario, registrants may choose a one-year or two-year term, with the annual fee payable to match the length of the term. The operating agreements with iGO and the AiGC have their own terms, which are not publicly available.

b. What types of licences are available?

Both provinces register B2C operators and B2B suppliers. In Ontario, the AGCO registers internet gaming operators and gaming-related suppliers, which fall into two categories: manufacturers, and other suppliers of gaming equipment or services directly related to the playing of a lottery scheme or the operation of a gaming site. Suppliers of goods or services that are not directly related to gaming register as non-gaming-related suppliers. In Alberta, the AGLC registers iGaming operators and iGaming goods or services suppliers. Supplier fees differ between providers of platforms or critical gaming systems and providers of other goods and services.

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

Yes. In both Ontario and Alberta, businesses that offer games to players register as operators, while B2B suppliers that provide relevant gaming goods or services register as suppliers.

d. Do software suppliers need to be licensed?

Yes, as B2B suppliers, where the software is related to the playing of a game or the operation of a gaming site. In both provinces the regulator assesses case by case whether a particular supplier must register based on the services it provides. In making this assessment, the AGCO focuses 'on the activity that the company or individual will be engaging in, and not the category of business'. The AGCO's published examples of suppliers that may need registration include platform providers, suppliers that develop or run games and game systems, customer e-wallet providers, odds makers, sports integrity monitors and independent test laboratories.

In Ontario, providers of internet services, commercial off-the-shelf hardware, cloud services, payment processing without a customer wallet function, affiliate marketing services and geolocation services may not require registration. Ontario charges an annual regulatory fee of C$15,000 for manufacturers and C$3,000 for other gaming-related suppliers.

The AGLC's Standards and Requirements for Internet Gaming (SRIG) list the functions that require supplier registration, including supplying equipment or services to operate or support an iGaming site, testing or maintenance, and management or consulting services. They also provide a non-exhaustive list of examples: platform providers, game and game system suppliers,

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customer e-wallet providers, odds makers, independent integrity monitors and accredited testing facilities (SRIG 2.2.4 and 2.2.5). In Alberta, suppliers of platforms and critical gaming systems pay C$15,000 annually and other suppliers C$3,000.

5. Are any types of gambling products prohibited?

Yes. The *Criminal Code* excludes three-card monte, punch boards and coin tables from the definition of 'lottery scheme' (s 207(4)(a)), so they cannot lawfully be offered even by a province. Bookmaking, pool selling and the making or recording of bets on horse races are also excluded from the definition of 'lottery scheme' (s 207(4)(b)). Pari-mutuel betting on horse races is separately regulated under ss 204 and 207(5) of the *Criminal Code*.

In Ontario, the Registrar's Standards for Internet Gaming (Registrar's Standards) limit the events and bet types that operators may offer. Standard 4.34 requires, among other things, that the majority of participants in the event or league be 18 or older, that sporting events be supervised by a sport governing body, and that bets not be reasonably objectionable. It also prohibits bets on assets and financial markets, bets that expose players to losses greater than the amount wagered, bets that mimic the structure of financial instruments (including contracts for difference and spread betting), bets on synthetic lottery products and lottery outcomes, and bets on minor league sports in Canada, including the Canadian Hockey League. Standard 2.16 prohibits auto-play features for slots.

The SRIG applies essentially the same criteria to sport and event bets (SRIG 4.6.5). Alberta also prohibits political and election betting (SRIG 4.6.5(p)), has not yet approved online bingo, and allows only PlayAlberta.ca to offer lottery products.

Peer-to-peer games (such as online poker) involving players in Canada and players outside Canada are not currently offered in the regulated provincial markets. The issue of whether Ontario's proposed pooled-liquidity model involving players outside Canada is lawful under the *Criminal Code* is currently before the Supreme Court of Canada (on appeal from *Reference re iGaming Ontario*, 2025 ONCA 770).

Prediction markets are a developing area. On August 27, 2026, the Canadian Securities Administrators (CSA) and the Canadian Investment Regulatory Organization (CIRO) stated that event contracts based on sports or entertainment outcomes should not be regulated within securities and derivatives legislation, and CIRO indicated that it will not approve applications by its dealer members to trade those contracts. So far, however, provincial regulators have not shown a willingness to offer such products directly, or in the case of Ontario and Alberta, approve the offering of such products by operators, however regulator positions in this area continue to evolve.

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.

In Ontario, an internet gaming operator applies to the AGCO through the iAGCO online portal. The application includes an operator application form, a gap analysis against the Registrar's Standards, personal disclosure forms for key individuals, entity disclosure forms for corporate shareholders and other entities with an interest in the applicant, and supporting corporate and financial documents. The annual regulatory fee is C$100,000 per gaming site, and the Registrar may also require the applicant to pay the reasonable costs of its investigation, in an amount to be determined by the regulator. Registration alone does not permit an operator to go live. It must also enter into an operating agreement with iGO and have its games and critical gaming systems certified by an independent testing laboratory.

In Alberta, an operator must first register with the AGLC. That process involves due diligence and background checks, a compliance and technical review, and integration with the AGLC's centralised self-exclusion programme. The operator must then enter into an operating agreement with the AiGC before it may accept bets. A separate application is required for each distinct iGaming site. Operators pay a non-refundable application fee and an annual registration fee for each site, in the amounts set in the AGLC Fee Schedule (SRIG 2.2.10 and 2.2.11), and applicants lodge an initial deposit of C$10,000 (or another amount specified) towards the cost of background checks (SRIG 2.4.3). Operators that had been active in Alberta's unregulated market were required to apply and to stop their unregulated activity by July 13, 2026, subject to a discretionary extension that ended on October 13, 2026. The AGLC has indicated that failure to follow its transition guidance may result in a finding of unsuitability.

Neither province requires an operator to incorporate locally. The operating agreements may, however, impose

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requirements relating to banking, player funds and data.

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

Generally not in the iGaming context. Individuals are not separately licensed. Instead, the background of key individuals is checked as part of the operator's or supplier's registration. In Ontario, personal disclosure forms must be completed by each officer and director of the applicant and its parent or holding corporations, each shareholder holding 5% or more of any shares of the applicant, trustees and beneficiaries of trusts that hold shares or interests in the applicant, and principal employees. Individuals whose primary residence is outside Canada must provide a criminal background check from the last 12 months. The Registrar may also investigate the character, financial history and competence of persons 'interested' in the applicant, which includes persons with a beneficial interest in, control over, or who have provided financing to, the applicant's business.

In Alberta, the AGLC conducts background checks on the applicant, its 'associates' and its 'key employees' (SRIG 2.4.1). Associates include any person with a financial interest in the applicant or its business, along with certain related persons and affiliated corporations. Key employees include individuals who exercise influence or control over day-to-day operations or decision-making, such as the chief executive officer, chief financial officer, controller, senior compliance officers and chief information officer (SRIG 2.4.4 and 2.4.5). Registrants must notify the AGLC immediately of any change in key employees, and if any officer, director, shareholder or owner is charged with or convicted of certain offences (SRIG 2.3.4 and 2.4.13). The AGLC may accept an applicant's registration in another jurisdiction where the applicant performs the same role (SRIG 2.4.14).

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

The *Criminal Code* prohibits certain forms of gambling advertising, including advertising a scheme for disposing of property by chance and advertising an offer, invitation or inducement to bet on the result of a contest (ss 206(1)(a) and 202(1)(h)). Advertising is therefore generally permitted only for lawful gambling, such as gambling conducted and managed by a province. In Ontario and Alberta, registered operators may advertise, subject to detailed standards, and advertising for an iGaming site in Alberta by a person who is required to be registered but is not may itself be a provincial offence.

In Ontario, the Registrar's Standards require advertising to be truthful and not misleading. Advertising must not, for example, present gambling as a solution to financial or personal problems or as an alternative to employment, suggest that winning is the probable outcome, or encourage players to chase losses. Advertising must not target minors, high-risk players or self-excluded persons, and must not use cartoon figures, celebrities, social media influencers or entertainers likely to appeal to minors. Since February 28, 2024, active or retired athletes may appear in advertising only to advocate for responsible gambling. Advertising of inducements, bonuses and credits is prohibited except on the operator's own site and in direct marketing to players who have actively opted in. Where such offers are permitted, all material conditions must be disclosed, and offers may not be described as 'free' or 'risk-free' if the player must risk their own money. iGO also imposes marketing and branding requirements through its operating agreement.

Alberta has adopted a broadly similar approach. The *Gaming, Liquor and Cannabis Regulation* requires iGaming advertising to be truthful and not misleading, and prohibits advertising directed at minors or intentionally communicated to self-excluded or high-risk individuals (*Gaming, Liquor and Cannabis Regulation*, s 34.7). Advertising must carry a responsible gambling message (SRIG 3.3.6), and standards updated on June 18, 2026 limit inducement advertising to operators' own sites and opt-in direct communications. They also restrict the use of athletes to responsible gambling messaging and prohibit advertising likely to appeal to minors or placed where most of the audience could reasonably be expected to be minors (SRIG 4.1.2 and 4.1.4).

Federal laws of general application also apply, including the false or misleading representation provisions of the *Competition Act* (ss 52 and 74.01) and CASL, which generally requires consent before commercial electronic messages are sent. There is also ongoing pressure for further federal restrictions, reflected in Bill S-211 (see question 18).

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

Yes. Marketing affiliates are not licensed and are generally not required to register as B2B suppliers in Ontario or Alberta. In Ontario, the AGCO lists marketing

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affiliates among the businesses that may not require registration, although it reserves case-by-case discretion. Affiliates are instead regulated indirectly through the operators that engage them. In Ontario, operators are responsible for the actions of third parties they contract with (Standard 1.19) and must ensure that their affiliates do not also market online gaming sites that accept wagers from Ontario players without AGCO registration (Standard 1.21). In Alberta, the prohibition on advertising an iGaming site other than in accordance with the AGLC's standards applies to any 'person', which appears to extend to affiliates. Operators remain responsible for ensuring compliance with the applicable advertising standards. Alberta operators are also responsible for the actions of third parties they contract with and must provide the AGLC with a quarterly list of their suppliers, which expressly includes marketing affiliates (SRIG 4.11.11 and 4.11.12; AGLC Internet Gaming Notification Matrix).

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

Under the *Criminal Code*, keeping a common gaming house or common betting house (s 201(1)) and conducting unlawful lotteries or games of chance (s 206(1)) are hybrid offences punishable on indictment by up to two years' imprisonment. Bookmaking, pool selling and related betting offences under s 202 extend to transmitting betting information (s 202(1)(i)), advertising inducements to bet (s 202(1)(h)) and aiding or assisting (s 202(1)(j)). They are indictable offences carrying up to two years' imprisonment, with minimum terms of 14 days for a second offence and three months for each subsequent offence (s 202(2)). Unless otherwise provided, a summary conviction offence carries a fine of up to C$5,000, imprisonment of up to two years less a day, or both (s 787(1)). An organisation may be fined an amount in the court's discretion on indictment, or up to C$100,000 on summary conviction (s 735(1)).

Provincial statutes add their own offences. In Ontario, an individual convicted of an offence under the *Gaming Control Act, 1992* is liable to a fine of up to C$50,000, imprisonment of up to one year, or both, and a corporation to a fine of up to C$500,000 (s 46). In Alberta, providing or operating an iGaming site, or supplying goods or services for one, without registration (s 49.1(1)), and advertising an iGaming site contrary to s 49.41, are punishable by a fine of up to C$500,000, imprisonment of up to 12 months, or both (*Gaming, Liquor and Cannabis Act*, s 118). In British Columbia, the unauthorised conduct, management or operation of a lottery scheme is punishable on a first conviction by a fine of up to C$100,000 (and, for individuals, up to six months' imprisonment), rising to C$200,000 (and up to 12 months) on subsequent convictions (*Gaming Control Act*, s 168).

Provincial lottery corporations have also used civil proceedings. In *Manitoba Liquor and Lotteries Corporation v IL Nido Ltd*, 2025 MBKB 89, the Court of King's Bench of Manitoba granted an order requiring an offshore operator to block Manitoba players. Because the proceeding was uncontested, the decision may carry limited weight on the underlying *Criminal Code* questions.

Players may also be penalised. It is a summary conviction offence to be found, without lawful excuse, in a common gaming house or common betting house (s 201(2)(a)), and to buy, take or receive a lottery ticket or other device in an unlawful lottery (s 206(4)). In practice, in the iGaming context, such prosecutions against players are rare and enforcement has focused on operators.

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

In Ontario, registrants must comply with the *Gaming Control Act, 1992*, O Reg 78/12, the terms of their registration and the Registrar's Standards. The Registrar's Standards are largely outcomes-based and are organised around six themes: entity-level controls, responsible gambling, prohibiting access by designated groups and player account management, game integrity and player awareness, public safety and protection of assets, and minimising unlawful activity. Registrants must notify the AGCO of specified events under its notification matrix. For example, changes in officers or directors must be reported within five business days and require the Registrar's approval. Games and critical gaming systems must be certified before going live and monitored throughout their life.

Ontario operators pay the C$100,000 annual regulatory fee per gaming site. Under the operating agreement, gaming revenue is deposited with iGO, which returns a portion to the operator as compensation for the online services it provides.

In Alberta, operators must comply with the SRIG and the AGLC's Internet Gaming Notification Matrix, integrate with the AGLC's centralised self-exclusion system, and pay the annual registration fee for each site. Under the

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AiGC arrangements, operators receive 80% of net iGaming revenue. Separate allocations of 2% of gross gaming revenue to support First Nations and 1% to social responsibility initiatives have also been announced. The AiGC manages anti-money laundering reporting, public complaints and financial reporting for the market.

12. Briefly detail key anti-money laundering requirements.

The PCMLTFA applies to provincial governments that conduct and manage casino games or slot machines in a permanent establishment (s 5(k)), and to provincial governments that conduct and manage lottery schemes, other than bingo or lottery ticket sales, that are accessible through the internet or another digital network (s 5(k.1)). The PCMLTFA therefore applies to the provincial conduct and manage function in the regulated online markets. The PCMLTFA does not name registered private operators. FINTRAC guidance states that the entity delegated by the province to conduct and manage a lottery scheme is responsible for meeting the PCMLTFA obligations, and that it may delegate its reporting to another entity but remains responsible. In the regulated online markets, those obligations therefore appear to rest with iGO and the AiGC, while operators' AML and know-your-client (KYC) obligations arise from provincial standards and their operating or commercial agreements. In Alberta, for example, registered operators and suppliers must maintain an AML/TF program that complies with the PCMLTFA and FINTRAC guidance and aligns with the controls of the designated reporting entity (SRIG 5.8). Those requirements operate alongside the PCMLTFA and do not replace it.

Operators are not required to register with FINTRAC as money services businesses (MSBs) merely because they accept wagers. The MSB categories in s 5(h) and (h.1) of the PCMLTFA cover businesses such as foreign exchange dealing, remitting or transmitting funds and dealing in virtual currencies, and they extend to foreign businesses that direct those services at persons in Canada. Accepting deposits and paying out winnings from a player's own gaming account does not appear, by itself, to fall within these categories. An operator or payment provider that carries on an MSB activity, such as dealing in virtual currency or transmitting funds for third parties, may need to register.

Reporting entities must maintain a compliance programme, verify client identity, keep records and report suspicious transactions to FINTRAC. Additional transaction-reporting requirements apply to casinos, including reports for large cash transactions, large virtual currency transactions, certain electronic funds transfers and casino disbursements of C$10,000 or more. Amendments made by the *Strengthening Canada's Immigration System and Borders Act*, SC 2026, c 4 (Bill C-12), which received Royal Assent and came into force on March 26, 2026, increased maximum administrative monetary penalties under the PCMLTFA by up to 40 times and introduced compliance orders and mandatory compliance agreements.

Provincial regulators impose their own requirements. In Ontario, the AGCO imposed a C$100,000 penalty on NorthStar Gaming on August 27, 2026, after it failed to conduct enhanced due diligence on a high-risk player who deposited approximately C$189,000 over 15 months. British Columbia's new *Gaming Control Act* makes preventing money laundering a core responsibility of the regulator and includes source of funds declarations for certain buy-ins (s 54). Money laundering is also a criminal offence punishable by up to ten years' imprisonment (*Criminal Code*, s 462.31).

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

Both Ontario and Alberta require every registered operator to integrate with a centralised self-exclusion system, so that a player can exclude themselves from all regulated sites through a single process. Ontario's Centralized Self-Exclusion Program went live on May 14, 2026, through iGO's BetGuard platform, and the AGCO's related standards took effect on the same day. Players may exclude themselves from all regulated online gaming sites in Ontario, including OLG's, for six months, one year, five years or a custom period. Operators must check the registry, log out and exclude centrally self-excluded persons, return their unused funds and manage any system disruptions affecting registry checks. In Alberta, integration with the AGLC's centralised self-exclusion programme is a condition of registration. Operators must maintain an application programming interface (API) connection to the AGLC's centralised self-exclusion system and prevent anyone not cleared by it from registering or logging in (SRIG 3.5.2). Players may exclude themselves from online gaming, land-based venues or both, for periods from six months to three years.

Operators in both provinces must also provide system-enforced deposit, loss and time limits (with periods of at least 24 hours, seven days and one month), short-term breaks in play, responsible gambling information and staff training, and must not extend credit to players. In Ontario, operators must also monitor player risk profiles

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and behaviour to detect signs of harm, and game design must discourage extended, continuous and impulsive play, including a prohibition on auto-play for slots.

The minimum age for gambling is 19 in most provinces and 18 in Alberta, Manitoba and Quebec.

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

In Ontario, shareholders holding 5% or more of any shares of an applicant must file disclosure forms (personal disclosure for individuals, entity disclosure for corporate shareholders, including parent and holding corporations). Any change in a supplier's officers or directors requires the Registrar's written consent, failing which the registration is deemed to expire (*Gaming Control Act, 1992*, s 4(3)), and such changes must be reported through the notification matrix within five business days. Registrants must also notify the AGCO of material changes to the information provided in their application. Because the Registrar may refuse or revoke registration based on the conduct of persons 'interested' in a registrant, significant ownership changes may attract scrutiny and are often raised with the AGCO in advance.

In Alberta, there is no percentage threshold for disclosure on application equivalent to Ontario's 5% threshold. The AGLC's due-diligence requirements extend to owners, persons with financial interests and other associated persons. Changes to shareholders, directors, officers and key employees are subject to the AGLC's due-diligence process. A registration cannot be sold, assigned or transferred, and is cancelled if it is sold, assigned, or transferred (*Gaming, Liquor and Cannabis Regulation*, s 30). It is also cancelled where a sale, assignment or transfer of a portion of the registrant's business results in a change in control (s 30.1). Where there is no change in control, a proposed sale, assignment or transfer of a portion of the business of a corporation that is not a distributing corporation must be reported to the AGLC and approved by its board before it takes effect. For a distributing (publicly traded) corporation, a sale, assignment or transfer of 5% or more must be reported within 10 business days after it takes effect and approved by the board (s 30.2). The SRIG's concept of control includes holding securities carrying more than 50% of the votes to elect directors, or other influence resulting in control in fact (SRIG 2.4.6).

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

In Ontario, the Registrar may refuse to register or renew, propose to suspend or revoke a registration, or immediately suspend a registration where it considers this necessary in the public interest. Registrants may request a hearing before the Licence Appeal Tribunal. The Registrar may also impose monetary penalties of up to C$200,000 per contravention for operators and C$100,000 for suppliers.

Recent AGCO monetary penalties in the online market include:

- CAD $200,000 against theScore.Bet (Score Media and Gaming Inc, October 6, 2026) for misleading cash-out offers;
- CAD $100,000 against NorthStar Gaming (August 27, 2026) for anti-money laundering control failures, including failing to conduct enhanced due diligence on a high-risk player;
- CAD $70,000 against Booming Games (Malta) Limited, a supplier (August 20, 2026), for offering a prohibited auto-play feature on slot games;
- CAD $120,000 against Betty Gaming Ltd (August 6, 2026) after a flaw in its age-verification controls allowed underage individuals to create and fund accounts; and
- CAD $40,000 each against Relax Gaming Limited and Arrise Solutions Limited, both suppliers (May 7, 2026), for allowing their games to appear on unregulated sites accessible to Ontario players.

The common themes are anti-money laundering controls, underage access, game design and certification, and supply chain integrity. The AGCO also appears increasingly willing to penalise suppliers as well as operators. Earlier penalties focused on advertising and inducements.

In Alberta, the AGLC board may issue warnings, impose or amend conditions, suspend or cancel a registration, and impose fines. The fines may be up to C$1,000,000 where a person has failed to comply with the *Gaming, Liquor and Cannabis Act*, and otherwise up to C$200,000, or C$500,000 for an iGaming supplier (s 91). The AGLC has also indicated that failure to follow its market transition guidance may lead to a finding of unsuitability. FINTRAC may also impose administrative monetary penalties under the PCMLTFA, which were significantly increased in 2026.

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16. What is the tax rate?

There is no separate federal gaming tax on private operators. Instead, the provinces take their share through the commercial arrangements with the conduct and manage entity. In Ontario, iGO retains 20% of gaming revenue and returns 80% to operators. In fiscal 2024-25, iGO paid dividends of C$181 million to the province. In Alberta, operators receive 80% of net iGaming revenue, and 2% and 1% of gross gaming revenue are allocated to First Nations and social responsibility initiatives respectively. Suppliers are remunerated under commercial contracts with the lottery corporations or operators.

Players' gambling winnings are generally not taxable in Canada unless the gambling activity constitutes a business, such as where an individual carries on gambling in a sufficiently commercial and organised manner.

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

No. Cryptocurrency is not permitted in either regulated market. Ontario's Registrar's Standards require player deposits to be authorised by a financial services provider and state that 'Cryptocurrency is not legal tender and shall not be accepted' (Standard 5.69). Alberta's SRIG contains an equivalent statement (SRIG 4.4.23). Offshore sites that accept cryptocurrency from Canadian players operate outside the provincial frameworks and are likely to be unlawful under the *Criminal Code*.

Cryptocurrency is otherwise regulated federally. Casinos that are reporting entities must report virtual currency receipts of C$10,000 or more to FINTRAC, and businesses dealing in virtual currencies are MSBs that must register with FINTRAC. Crypto asset trading platforms may also be subject to provincial securities regulation and, where applicable, CIRO oversight. The federal government has enacted a stablecoin framework that is expected to come into force in 2027, with issuers to be registered with and subject to prudential requirements overseen by the Bank of Canada.

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 most significant pending matter is an appeal before the Supreme Court of Canada (file 42141), *Atlantic Lottery Corporation, et al v Attorney General of Ontario*. It asks whether online gaming and sports betting in Ontario would remain lawful under the *Criminal Code* if Ontario players were permitted to participate in games and betting involving individuals outside Canada. In *Reference re iGaming Ontario*, 2025 ONCA 770, a majority of the Court of Appeal for Ontario answered yes, finding that the proposed model is consistent with s 207(1)(a). The appeal, brought by other provincial lottery corporations, was heard on October 7, 2026, and the Court reserved judgment. A decision could determine whether Ontario, and potentially other provinces, may offer internationally pooled online poker and other peer-to-peer games, and may also clarify the scope of 'conduct and manage' more generally.

Since the emergence of the Ontario and Alberta regulated markets the prevalence of gaming advertisements has been a hot political topic in Canada. Bill S-211, the *National Framework on Sports Betting Advertising Act*, would require the Minister of Canadian Heritage to develop a national framework on sports betting advertising, including measures that may limit the frequency, scope and location of advertising and the participation of celebrities and athletes. The bill passed the Senate on October 21, 2025, and has been before the House of Commons Standing Committee on Canadian Heritage since April 22, 2026. Separately, more than 40 senators wrote to the Prime Minister in November 2025 calling for a complete ban on sports betting advertising.

Bill S-241, *An Act to amend the Criminal Code and the Indian Act*, would permit the governing body of a First Nation to conduct and manage lottery schemes on or from its reserve under its own laws. It was referred to the Standing Senate Committee on Legal and Constitutional Affairs on March 12, 2026.

The timing of these legislative proposals remains uncertain. Neither S-211 nor S-241 has passed the House of Commons, and the Supreme Court's decision in file 42141 has not yet been issued.

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

The most significant potential development is the opening of competitive online markets in additional provinces, with Quebec now the most prominent candidate. The Parti Québécois, which formed a minority government following the October 5, 2026, provincial election, had, before the election, expressed support for regulating private online gaming, whilte the Quebec

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Liberal Party proposed to expand the mandate of the Régie des alcools, des courses et des jeux (RACJ) so that it could license and oversee private online gambling platforms in Quebec. Whether the new government proceeds with that approach, and the form and timing of any legislation, remain uncertain. No other province has publicly committed to opening a competitive market. British Columbia, Saskatchewan and Manitoba each operate an established online platform through their lottery corporations, and a change in the Atlantic provinces would require agreement among the four governments that jointly own the Atlantic Lottery Corporation.

Alberta's transition period ended at its October 13, 2026, outer limit, after which operators that received transitional relief were expected either to have launched in the regulated market or to have exited it. The AGLC's treatment of registrants that were neither live nor withdrawn by that date is likely to be an early indicator of how the Alberta market will be supervised. In British Columbia, the new *Gaming Control Act* and regulations provide the general manager with significant regulation-making and regulatory powers, and the new regulatory framework took effect on April 13, 2026. The Act also permits the minister to issue directives to BCLC (s 13). In Ontario, the Centralized Self-Exclusion Program is in its first year, and the AGCO continues to update the Registrar's Standards, most recently in May 2026.

Following the CSA and CIRO guidance of August 27, 2026, provincial gaming and financial regulators may further clarify how sports and entertainment event contracts will be treated. Operators and payment providers should also expect continued supervision by FINTRAC under its expanded penalty framework, and by the Bank of Canada under the *Retail Payment Activities Act*. The federal stablecoin framework is also being implemented, with supporting regulations under development and the framework expected to come into force in 2027.

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

The most immediate risk is political pressure over the volume of gambling advertising. Sports betting advertising has become a significant policy issue, and concern about it has grown. In November 2025, more than 40 senators called on the Prime Minister to ban sports betting advertising, drawing a comparison with the ban on tobacco advertising. In an Angus Reid Institute survey conducted in May 2026, 74% of Canadians supported limiting advertisements during sports broadcasts and 52% supported banning sports betting advertising outright. Bill S-211 would establish a national framework for regulating sports betting advertising, while provincial standards already restrict inducements and the use of athletes and other advertising practices. Further restrictions could constrain acquisition channels and increase marketing costs, particularly for new entrants.

Legal uncertainty is a second risk. The Supreme Court of Canada's decision on international liquidity could clarify the scope of s 207(1)(a) of the *Criminal Code*, including the extent to which Ontario may participate in internationally pooled online gaming and the implications for the conduct-and-manage requirement. The Ontario Superior Court of Justice upheld Ontario's iGaming model against a challenge by the Mohawk Council of Kahnawà:ke in 2024, finding that Ontario, through iGO, was conducting and managing the scheme (*Mohawk Council of Kahnawà:ke v iGaming Ontario*, 2024 ONSC 2726 at para 107). The Supreme Court heard the appeal on October 7, 2026, and has reserved judgment.

Unregulated competition remains a third risk, although it is declining in Ontario. In a survey commissioned by the AGCO and iGO in spring 2026, 91.1% of Ontario players reported choosing regulated sites, up from 83.7% in 2025. Offshore sites, sweepstakes-style products and prediction markets may continue to compete for players, while the regulatory tools available to address some of these products continue to develop. Finally, FINTRAC's expanded penalty and compliance-enforcement framework introduced in 2026 may increase compliance costs and enforcement exposure for operators and their suppliers.

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

Ontario is one of the largest regulated online gambling markets in North America. In fiscal 2024-25, its regulated market recorded C$82.7 billion in wagers and C$2.9 billion in gaming revenue across about 50 operators and more than 80 gaming websites. Alberta opened its market on July 13, 2026, with 22 operator sites live on the first day, and Quebec may follow, depending on whether its new government proceeds with licensing (see question 19).

Both markets operate under published, largely outcomes-based standards. Ontario's regulated market has also achieved a high channelisation rate, which suggests that operators in the regulated market face comparatively limited competition from unregulated sites. For B2B

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suppliers, a single business may supply every provincial lottery corporation as well as private operators in Ontario and Alberta, and an Ontario gaming-related supplier registration covers both online and land-based gaming. Canada also offers proximity and shared time zones with the United States, a strong sports culture, an experienced and multilingual workforce in centres such as Toronto, Vancouver and Montreal, and federal tax incentives for eligible research and development through the Scientific Research and Experimental Development (SR&ED) programme.

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