Proliferation Financing

Operator Training and Awareness Survey

2026

Gambling Supervision Commission

Ground Floor, St George's Court

Myrtle Street

Glossary

Term	Meaning in this Report
AML/CFT	Anti-Money Laundering / Countering the Financing of Terrorism
BRA	Business Risk Assessment
The Code	The Gambling Anti-Money Laundering and Countering the Financing of Terrorism Code 2019
Customs	Isle of Man Customs and Immigration Division
FATF	Financial Action Task Force
FIU	Isle of Man Financial Intelligence Unit
FSA	Isle Of Man Financial Services Authority
IFC	International Financial Centre
ML	Money Laundering
MLRO / DMLRO	Money Laundering Reporting Officer / Deputy Money Laundering Reporting Officer
NO	Nominated Officer
NRA	National Risk Assessment
Operator	The holder of an online gambling licence, issued under the Online Gambling Regulation Act 2001; The holder of a casino licence, issued under the Casino Act 1986; The holder of a bookmaker's permit, issued under the Gaming, Betting and Lotteries Act 1988; and The holder of a betting office licence, issued under the Gaming, Betting and Lotteries Act 1988.
PF	Proliferation Financing
SMT	Senior Management Staff
TF	Terrorist Financing
TFS	Targeted Financial Sanctions

Executive Summary

In 2024, all gambling operators licensed by the Isle of Man Gambling Supervision Commission (GSC) and operating during 1 January 2023 to 31 December 2023 were asked to complete the Proliferation Financing ("PF") Survey.

Following the 2024 survey, a key findings report was published. The GSC highlighted key goals to be achieved following the report:

- Conduct appropriate PF outreach and address specific comments;
- Update GSC Guidance;
- Continue to gather outreach feedback at AML Forums; and

Issue a repeat survey to track changes and ascertain if further action is required.

PF outreach was conducted in conjunction with the Financial Services Authority, originating from inter-agency groups with members from Customs & Excise, the Financial Intelligence Unit, and Policy Office.

To support industry understanding and mitigation, the GSC has developed, and continues to update, PF-specific typologies. Typologies are regularly reviewed and operationalised through inspections, guidance, and outreach materials. In 2024 the GSC conducted a review of AML guidance, and is in the process of making further updates following the publications of the PF National Risk Assessment to further integrate PF risks and mitigations.

Alongside inspections, the GSC regularly tracks outreach progress through operator surveys and in-person feedback.

Survey Objectives

The 2026 PF Survey aimed to assess developments since the 2024 survey and provide an evidence base for the GSC's ongoing risk-based supervision and outreach. Its objectives are to:

- Assess operators' awareness and understanding of PF risks, including direct and indirect exposure;
- Evaluate how PF risks and the findings of the latest National Risk Assessments are being incorporated into business risk assessments, policies, procedures and controls;
- Assess the scope, frequency and effectiveness of PF training across the sector;
- Identify changes made in response to GSC and partner agency outreach since 2024;
- Identify gaps, emerging risks and areas requiring further supervisory attention, outreach or guidance; and
- Inform the GSC's assessment of the effectiveness of its PF supervision and outreach.

Methodology

This survey follows on from the previous proliferation financing survey issued in 2024. The purpose of the 2024 PF Survey was to:

- Establish the understanding and awareness of PF in the gambling sector;
- Identify any gaps, issues or risks and address these accordingly;
- Develop and enhance the GSC's role in this area through feedback; and
- Assist Cabinet Office with the preparation of PF Risk Assessment for the Isle of Man.

The data from the 2024 PF Survey was used to dictate the GSC's next steps in outreach and supervision of PF and anonymised data was shared with the Cabinet Office for the purpose of assisting with the creation of the PF Risk Assessment.

Like the 2024 PF Survey, the 2026 survey was split into two sections:

Awareness' – Which was aimed at understanding the industry's knowledge and risk understanding, how the sector stays 'up to date', the communication styles and references within internal documents in respect of PF; and

'Training' – Which was aimed at establishing If, How, to Whom and Where training was provided and what specific factors did it consider.

Updating the methodology for the 2026 Financing Survey Report

The 2026 follow-up survey was intended to assess how awareness, understanding and practical implementation of proliferation financing (PF) controls have developed since the previous survey issued via Strix in 2024 and the subsequent report published in October 2024. It also recognises that the licensed operator population has changed since the original survey, through the surrender of a number of licences and the issuance of new licences, and that comparisons with the previous survey population should be treated accordingly. Where

possible, comparisons will be made throughout this report, however, it is important to emphasise the difference in respondents.

The responses will help the GSC assess progress across the current sector, inform its analysis of the effectiveness of its supervision and outreach, and identify areas where further outreach or guidance may be needed.

The survey should be read in the context of the Isle of Man's recently published National Risk Assessment suite, including the first standalone PF NRA (published in July 2026). Given the PF NRA's recent publication, many operators are still embedding its findings within their risk frameworks; responses may therefore outline work completed, work in progress and planned next steps.

Survey Outcomes

Key Takeaways

1. Awareness has improved across the gambling sector since 2024, with operators reporting stronger organisational understanding and increased integration of PF into frameworks.

2. 94% of those who previously undertook the survey and 85% of first-time survey respondents said that their business has taken action to enhance its understanding of PF in recent years.

3. Of the previous survey participants, 80% reported improved understanding, while the remaining 20% stated awareness was already high.

4. GSC and partner-agency outreach have had a positive impact and prompted changes to internal frameworks.

5. PF training is broadly established across the sector, with most operators providing annual training, covering sanctions and tailoring content to operator-specific risks. Combined ML, TF and PF training remains appropriate where the distinct features of each risk are clearly addressed.

6. Board and senior management oversight remains important to ensure PF is treated as a distinct but related financial crime risk, training is appropriately resourced and identified knowledge or control gaps are addressed.

7. The findings will inform the GSC's risk-based supervision, including future outreach and testing of whether operators' reported understanding is reflected in effective risk assessments, training and controls.

Identified Gaps and GSC actions:

1. Many respondents described their PF risk as "Limited", "Low" or "Unlikely". Some of those respondents, however, noted that whilst likelihood of PF was assessed as medium low in the NRA, the consequences would be significant (regulatory, reputational, financial and international impacts) and are assessed as Medium. As such operators should still ensure that they understand where their potential vulnerabilities lie (such as those arising indirectly) and mitigate them where possible.

2. Operators should consider both Isle of Man and international developments. Given the Island's predominantly indirect exposure to PF and the limited number of domestic cases, understanding international typologies and emerging risks is necessary, particularly those arising in other international financial centres and jurisdictions with material online gambling sectors.

3. The GSC should conduct more specific outreach on PF that is tailored for each business arrangement (Online B2C, Terrestrial and B2B) with real-world examples where possible to provide further context to existing PF guidance that focuses on controls.

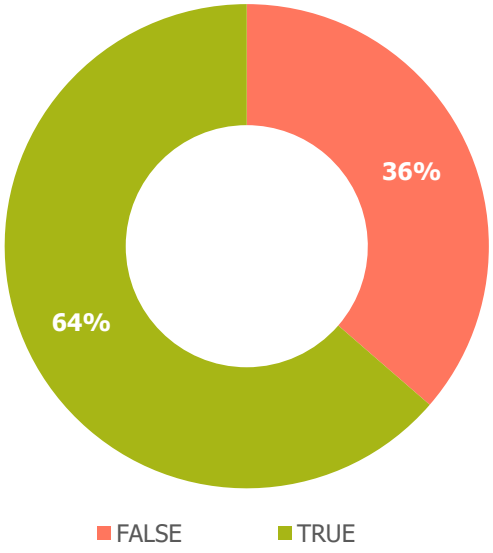


Previous Survey Participants

As it has been two years since the issuance of the previous survey, not all respondents were licenced by the GSC when the previous survey was issued. As such, the survey has split respondents into two categories, with those who did participate in the 2024 survey being asked some additional questions in the awareness section. Those questions are as follows:

- Would you say awareness of PF within your organisation has improved since the previous survey?
- If yes or in progress, please briefly describe the actions taken.

Did your organisation participate in the previous PF survey issued via Strix in 2024?



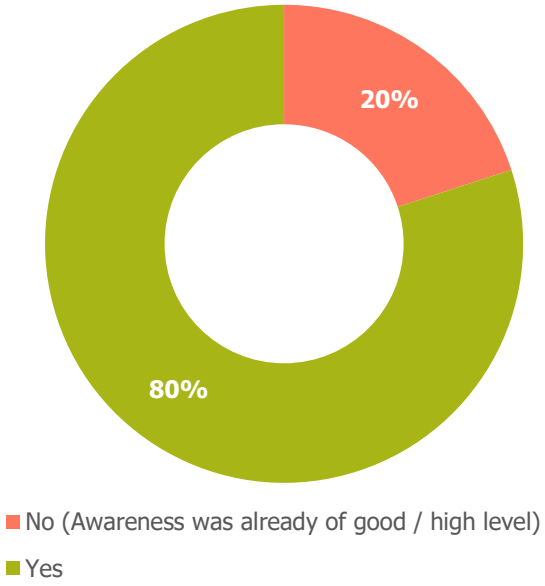
Approximately 64% of respondents to the 2026 survey also participated in the 2024 survey, providing a meaningful basis for assessing changes in PF awareness and practices over the period.

Actions taken since the previous survey included (but not limited to):

- Introducing of PF-specific risk training for staff;
- Updating Business Risk Assessment; and
- Updating Policies and Procedures.

94% of those who previously undertook the survey and 85% of first-time survey respondents said that their business has taken action to enhance its understanding of PF in recent years.

Would you say awareness of PF within your organisation has improved since the previous survey?



80% of respondents to this section felt that their organisation's awareness of PF has improved since taking part in the previous survey in 2024. Overall, no respondent reported a deterioration in awareness, indicating that previous levels have either been maintained or improved. The remaining 20% reported no change to PF awareness because they considered their organisation's existing level of awareness to already be good, rather than because awareness had declined.

Those who participated in the survey before have shown an improvement in various areas. As these findings reflect respondents' own assessments, they should be considered alongside the practical actions described in the following sections.

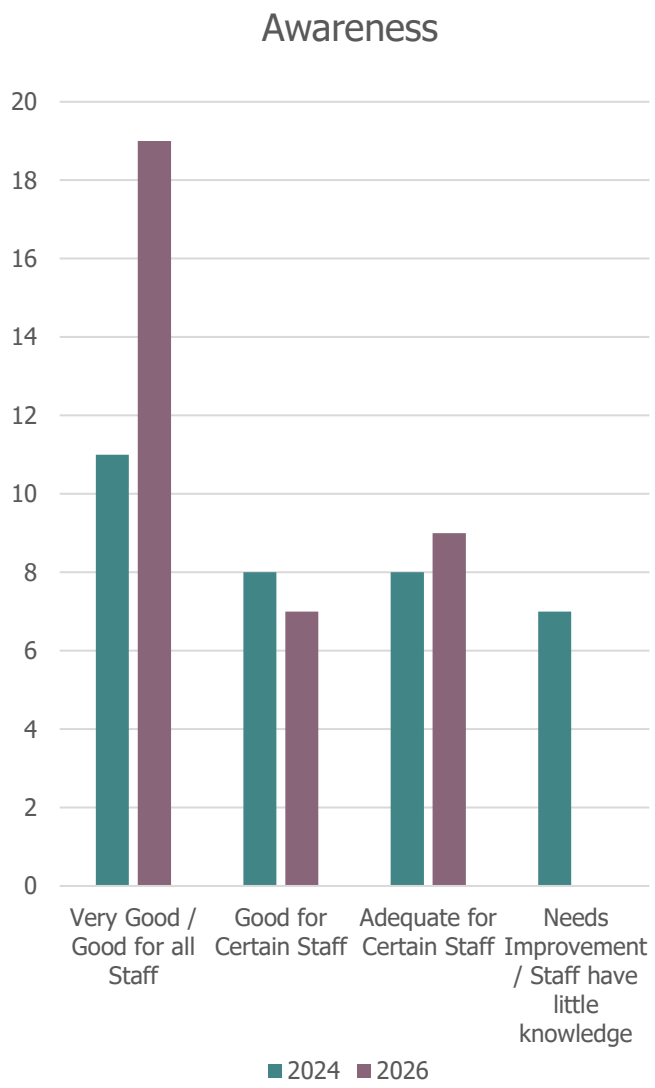
2024-2026 data: A comparison

If we compare the survey results from 2024 to those from 2026, we can see that overall awareness has improved considerably.

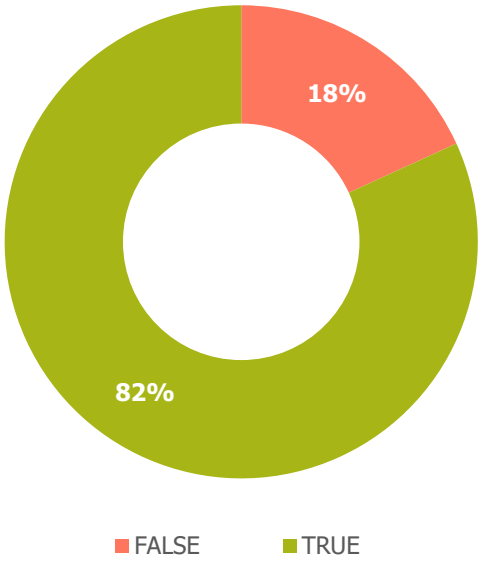
The 2026 findings indicate a clear improvement from the position reported in 2024, when some operators identified limited staff knowledge of PF and acknowledged that awareness required further development.

No respondents have seen a negative trend in staff awareness of proliferation and proliferation financing across organisational levels. Although the breadth and depth of knowledge varies according to staff roles and responsibilities, all operators report having staff with an adequate level of PF knowledge.

This suggests that the sector has progressed from identifying awareness gaps in 2024 to addressing them by developing broader organisational understanding and a stronger baseline of dedicated PF knowledge.



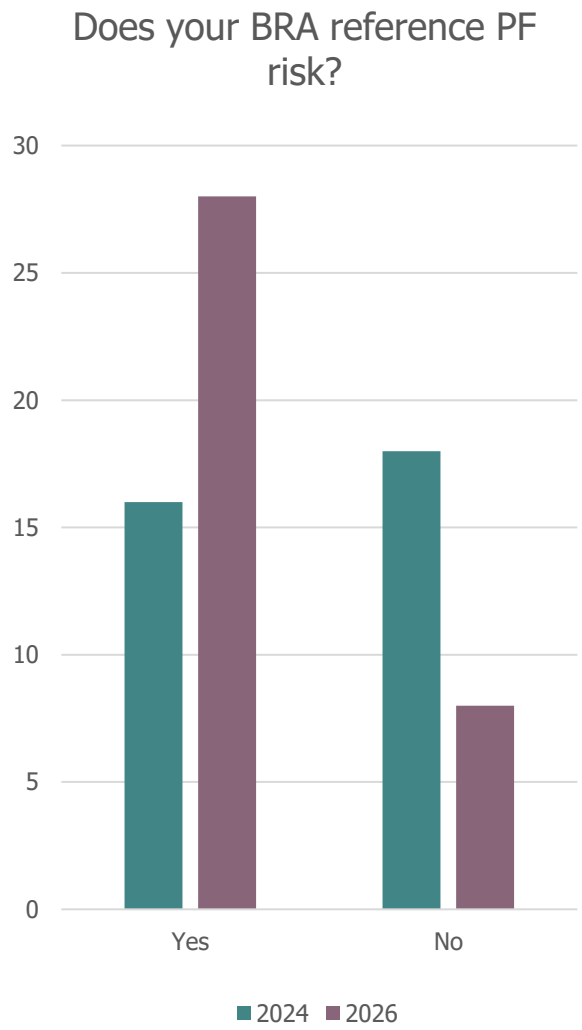
Does your Business Risk Assessment refer specifically to PF?



An area for improvement highlighted by the GSC in 2024 was the lack of PF risks within operator Business Risk Assessments. The 2026 survey data indicates positive progress, reflecting that more operators explicitly consider PF risk within their Business Risk Assessments compared to 2024.

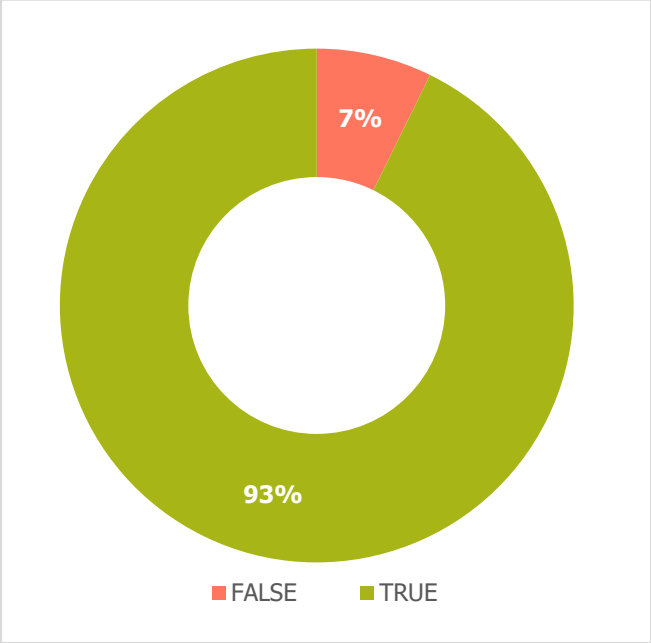
Following the 2024 findings, the GSC conducted outreach on PF in collaboration with parter agencies to improve PF awareness across the industry. Independently, the GSC launched a webinar series covering the GSC AML/CFT manual to help operators better understand GSC requirements and a series of factsheets and publications that covered key red flags and typologies for ML/TF/PF.

It is not a requirement under the Code to split TF and PF within a BRA, however, all operators are expected to identify and assess relevant PF risks as part of their BRA, even where their exposure is considered limited.



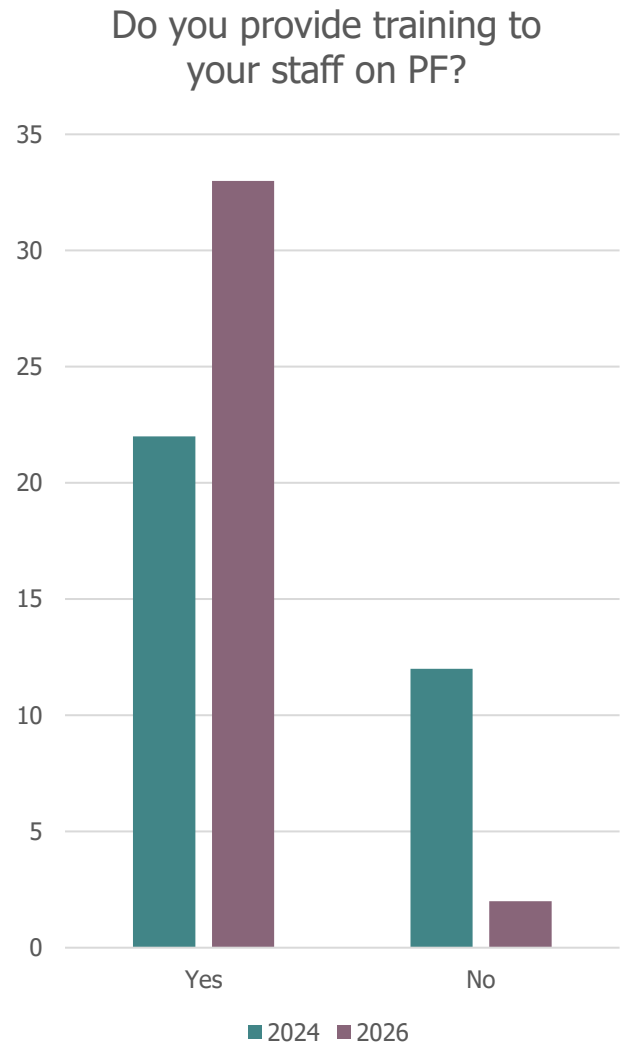
Progress should be considered in the context of operators' existing obligations under the Gambling AML/CFT Code 2019. As the Code's definition of terrorist financing incorporates proliferation financing, operators are required to identify and assess relevant PF risks within their Business Risk Assessments and apply appropriate controls to mitigate those risks. This consideration and the basis for the resulting assessment should be documented, including where an operator concludes that its exposure to PF risk is limited.

Do you provide training to your staff on Proliferation and Proliferation Financing?



Of those who undertook both the 2024 and 2026 PF surveys, we can see that 93% now undertake staff training on PF.

Paragraph 27 of the Code requires for education and training, including refresher training, at least annually, to be provided.

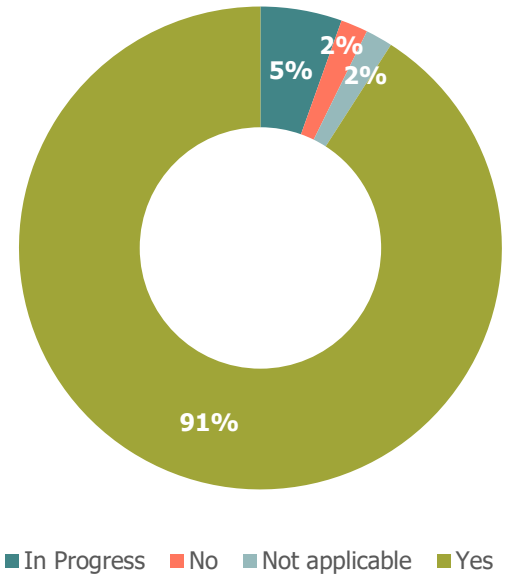


There was an increase in those who conduct staff training of PF from 65% in 2024 to 93% in 2026. There is more information on the method of training conducted further into the report.

Proliferation Financing Risk Awareness

The following section was answered by all respondents (both previous survey respondents and those conducting the survey for the first time) and covers organisational awareness of proliferation financing risks.

Since completing the previous survey, or since becoming licensed if later, has your organisation taken action to enhance its understanding of PF?



All respondents were asked whether their organisation has taken action to enhance its understanding of PF since onboarding or since the previous survey was issued (if they took part).

91% of respondents had taken action to enhance their organisation's understanding of PF, with a further 5% still in the process of doing so.

If yes or in progress, please briefly describe the actions taken.

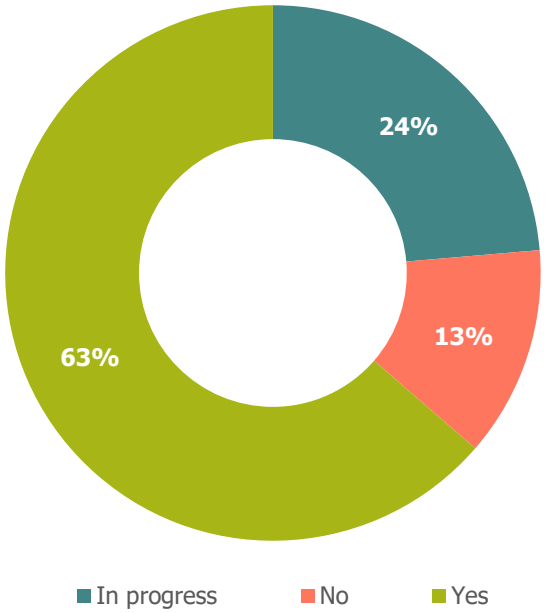
Respondents reported taking a range of practical measures since the previous survey to strengthen organisational understanding of proliferation and PF. These measures demonstrate the translation of awareness into more formal risk-management arrangements, staff risk understanding and internal communication.

Actions undertaken include:

- Incorporating PF into BRAs and AML/CFT Manuals/handbooks;
- Incorporating PF into staff training;
- Disseminating PF outreach to staff;
- Updating policies and procedures; and
- Reading and disseminating findings of the gambling and PF NRAs to staff.

Although the Isle of Man's 2025–2026 NRA assessed the jurisdiction's overall PF risk as Medium-Low, this national rating does not determine the exposure of every business. Operators should therefore assess how national and sectoral PF risks manifest through their own customers, products, services, delivery channels, use of technology, geographic links, ownership structures, counterparties and payment methods. The assessment should document the operator's specific exposure and proportionate controls, while relevant operator-level findings and emerging risks should inform its ongoing understanding of the wider sectoral and national risk environment.

Have you incorporated findings from Isle of Man's 2025/2026 NRA into your training programme.



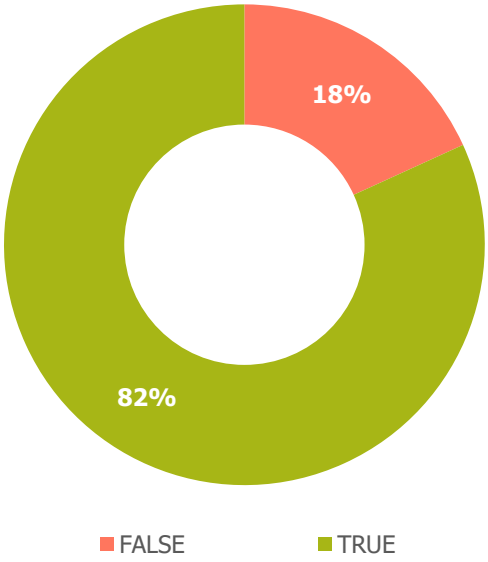
All respondents were asked whether the findings of the Isle of Man's 2025-2026 NRA had been incorporated into training programmes.

Paragraph 27 (2) (g) of the Gambling AML/CFT Code 2019 requires that training programmes include new developments, including information on current techniques, methods and trends in ML/FT (FT including PF as per the Code/TOCFRA definitions).

If no, or in progress, when do you plan to have this completed?

Those who had not yet incorporated findings from the National Risk Assessment noted that they planned to do so by close of 2026 or in the next review of their training cycle. This reflects that implementation is underway. Once completed, the updates should help staff understand how the latest national and sectoral findings relate to the operator's own PF exposure, understanding and controls.

Does your Business Risk Assessment refer specifically to PF?



All respondents were asked if their Business Risk Assessment (BRA) refers specifically to PF (as opposed to being combined with Terrorist Financing and/or other sanctions measures).

In 2024, 41.9% of respondents stated that their Business Risk Assessment (BRA) refers specifically to PF. In 2026, this rose to 82% of respondents. It is not a requirement under the Code to split the sections out, however, all operators are expected to identify and assess relevant PF risks as part of their BRA, even where their exposure is considered limited. The remaining responses (18%) therefore indicate that this area may require further attention to ensure that PF risk is considered and the basis for the assessment is documented consistently across the sector. As such, the GSC will provide operators with PF examples relating to specific licence types to ensure the risks are fully understood.

In your own words, how would you say your business is affected by PF?

Many note that although their business model makes PF risk limited/low, they understand that risks can occur in a variety of indirect ways, most commonly noted were:

- UBO of B2B relationships;
- Links for customers or partners to higher risk jurisdictions;

- Customer or B2B relationships conducted remotely that are more susceptible to fraud/deepfakes; and
- International nature of their business.

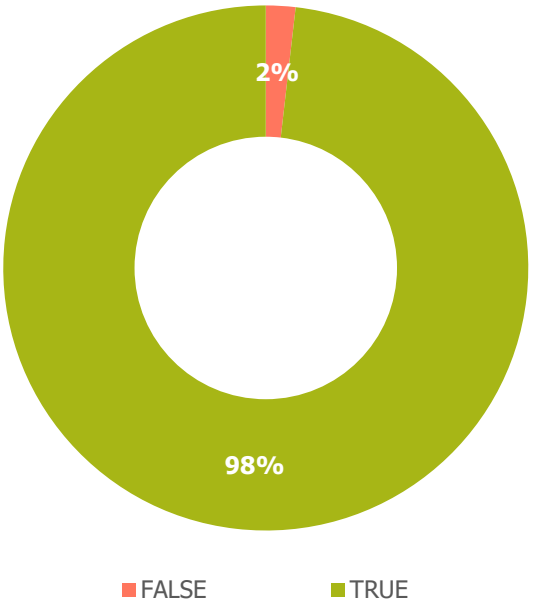
Many respondents described their PF risk as "Limited", "Low" or "Unlikely". Whilst likelihood of PF was assessed as medium low in the NRA, the consequences would be significant (regulatory, reputational, financial and international impacts) and are assessed as Medium. As such operators should still ensure that they understand where their potential vulnerabilities lie (such as those arising indirectly) and mitigate them where possible.

In your own words, how would you say the Isle of Man is affected by PF?

Respondents felt that the greatest risks for PF are due to its cross-border nature as an international financial centre. This is consistent with the PF NRA, which highlights the residual indirect risk arising from its role as an IFC and the sectors with greatest exposure being those serving international customers and cross-border activity.

Indirect Exposure

PF Risk Have you considered how PF risk could arise through indirect exposure, rather than direct trade exposure, within your business model?



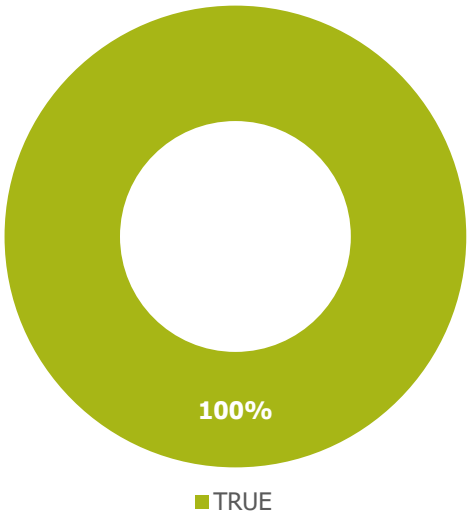
All but one respondent stated that they have considered indirect exposure to PF risks as part of their business model.

The Gambling National Risk Assessment noted that PF risk to the Isle of Man Gambling sector is rated as medium-low and PF threats to the Island are predominantly indirect:

- The IOM has almost no direct exposure to United Nations-designated PF States (Democratic People's Republic of Korea (DPRK) and Iran) and extremely limited domestic exposure;
- Trade in strategic or dual-use goods, but remains exposed through global financial channels;
- The most relevant indirect threat channels to the IOM are cross-border financial flows, multi-jurisdictional legal persons and arrangements (including complex ownership chains), storage/holding of funds and assets in administered structures;
- PF risk is more likely to arise indirectly through global financial and corporate channels than through domestic procurement activity; and

- International online business models, cyber-enabled crime typologies and links to virtual assets may create indirect PF exposure, particularly where illicit proceeds (including from cyber-enabled activity) are moved through gambling channels.

Has your organisation considered whether PF risk could arise through ownership and control structures, payment flows, suppliers, software providers, or virtual assets exposure?

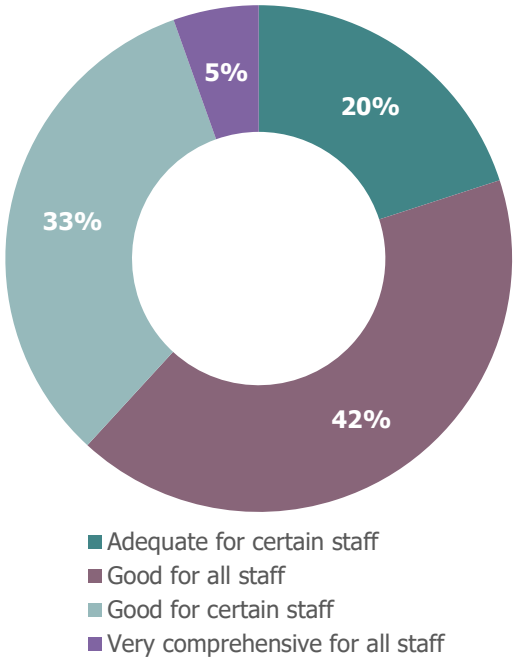


All respondents reported consideration that PF risk could arise through these potential channels of PF exposure. This indicates consistent sectoral awareness that PF risk may arise indirectly through corporate ownership and control, payment arrangements, third-party suppliers, technology providers and virtual assets, rather than solely through direct trade and customer relationships.

More information on gambling PF risks and typologies can be found in the Isle of Man Gambling Risk Assessment and Proliferation Financing Risk Assessment.

Proliferation Financing Awareness

Which of these statements do you think best reflects the general awareness of Proliferation and Proliferation Financing (PF) within your organisation?



Most operators (80%) feel that their awareness of Proliferation Financing is good or very comprehensive . This has increased from 2024, where 54% of respondents reported that awareness was "good" or "very comprehensive".

This indicates a generally sound level of organisational awareness. While the depth of knowledge may appropriately vary according to an individual's role, responsibilities and exposure to PF risk, all relevant staff should understand the PF typologies and red flags applicable to the gambling sector and know how to identify and escalate potential concerns.

The PF NRA found that PF understanding is less embedded than ML understanding and must evolve with geopolitical developments and recommended further awareness training.

Boards and senior management should treat PF as a distinct, but related risk category, ensuring that it is reflected in training plans, product governance, sanctions policies and internal audit scopes.

Discussions, whether in a formal or informal setting, around financial crime are a good way to engage all involved parties and raise awareness in matters that may be less familiar to some, such as PF, and the relevant risks associated with this globally, operationally or even personally.

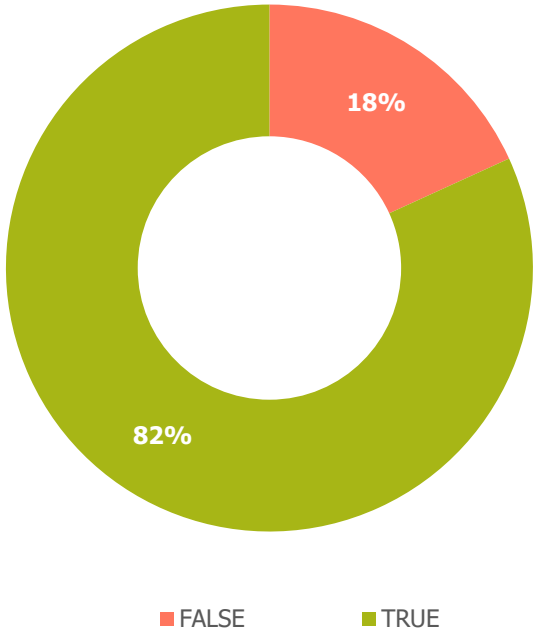
How does your business remain up to date with developments regarding PF? (e.g. GSC, FSA outreach, third parties…)

Respondents remain up to date with PF through a variety of channels including, but not limited to:

- Global compliance news portals/outlets;
- Outreach from regulators (e.g. FSA, GSC, FIU, Customs);
- Sanctions RSS feed; and
- FATF guidance and publications.

PF understanding has increased significantly in recent years following effective outreach from agencies and wider publications. The establishment of public-private partnerships such as the Isle of Man Financial Crime Partnership (IOM FCP) in recent years are also working to enhance sector understanding through pooled expertise and resources across regulated industries.

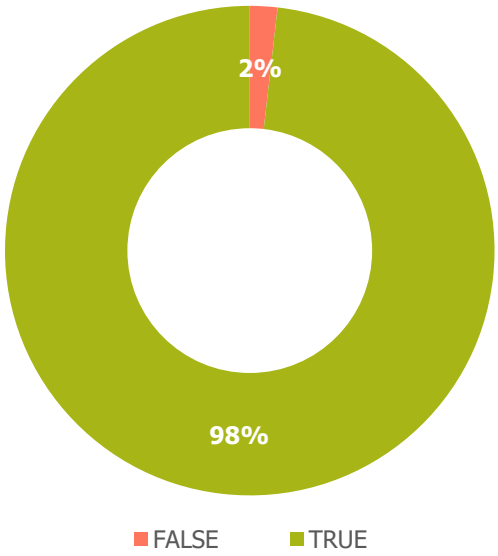
Have you made changes to your internal AML/CFT policies due to PF Outreach from the GSC or partner agencies? (for example, the PF video series in 2024?)



82% of respondents reported making changes to their AML/CFT policies in response to PF outreach from the GSC or partner agencies. The remaining responses may warrant further consideration to establish whether changes were unnecessary, already reflected in existing arrangements or remain in progress. Where further outreach is required, it will be targeted and specific to best support operators in their risk understanding.

Since 2024, the GSC has increased PF outreach in collaboration with partner agencies to enhance awareness amongst licensed entities. This included various written resources, videos and presentations.

Have the GSC's typology and red flag documents enhanced your understanding of gambling specific PF risks?



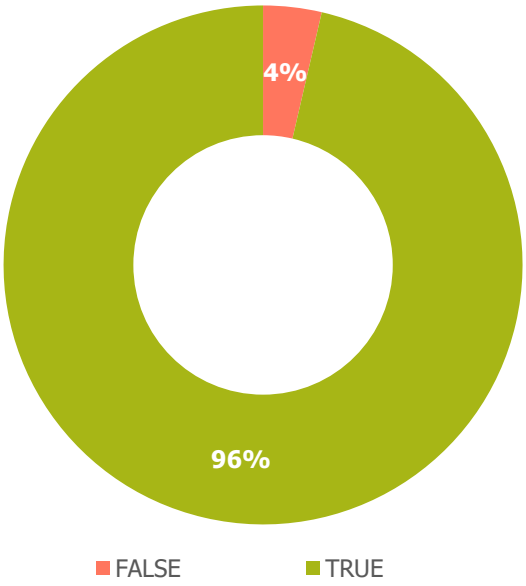
98% of respondents stated that key typology and red flag documents shared by the GSC enhanced their understanding of proliferation financing (PF).

This positive response indicates that sector-focused materials have been effective in translating PF threats into indicators that operators can recognise and apply within their own risk assessments, training and controls.

Following publication of the NRA, the GSC enhanced its inspection procedures by introducing more targeted questions on PF, Targeted Financial Sanctions (TFS) and terrorist financing (TF). These questions are used to test whether operators understand how the distinct risks and typologies apply to their business models and whether that understanding is reflected in their risk assessments, policies, training and controls.

The GSC publishes key gambling typologies and red flags on its news and publications pages.

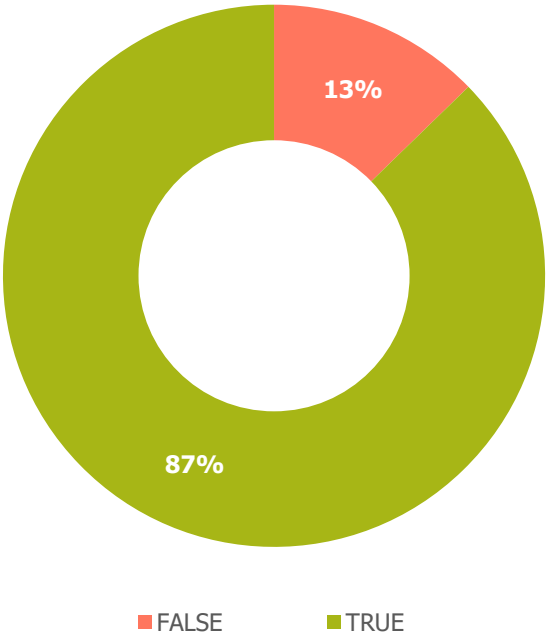
Has the FIU's Online Gambling Typologies report enhanced your understanding of the gambling specific PF risks?



96% of operators stated that the Isle of Man FIU's Gambling Typology Report has enhanced their understanding of gambling-specific PF risks.

Operators should continue to review and incorporate relevant PF findings published by other Isle of Man agencies and international bodies, including reports and typologies from comparable small international financial centres. This wider evidence base can help identify emerging risks, keep operators' understanding of PF risk current, and strengthen operator specific risk assessments, training and controls.

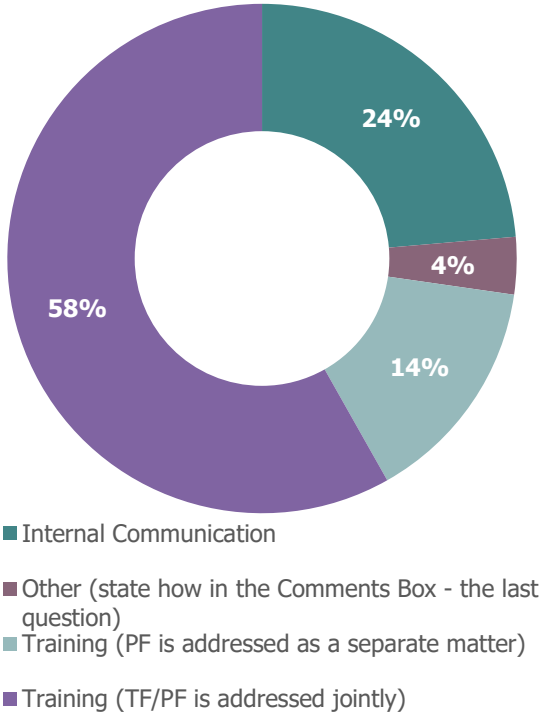
Would you say your awareness of specific typologies (for example DPRK IT workers) has improved following GSC outreach?



87% of respondents felt that their awareness of specific typologies has improved due to outreach by the GSC.

This indicates that targeted, practical outreach has helped operators recognise emerging methods by which PF and sanctions evasion risks may arise through recruitment, outsourcing, remote working and third-party relationships. The GSC will continue to share relevant typologies with the sector.

How does your business communicate developments regarding PF to staff?



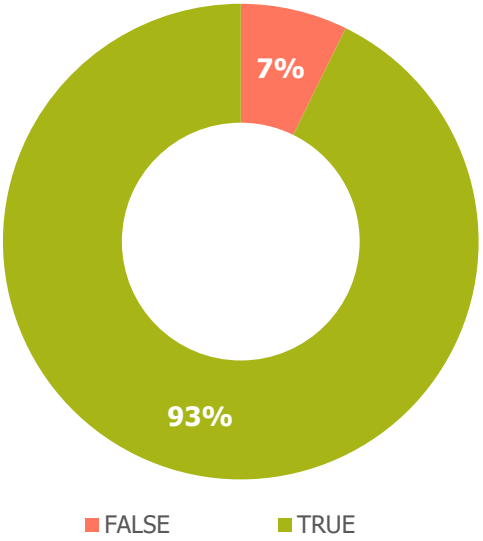
58% of operators communicate Proliferation Financing developments primarily through training where TF/PF are jointly covered. 24% communicate PF through internal communication channels, 15% communicate PF through dedicated PF training and the remaining two respondents selected "Other".

Combined ML, TF and PF training is appropriate where it reflects the operator's business model and PF exposure i.e. operators with higher PF risk and exposure should consider targeted standalone training if proportionate.

Although ML, TF and PF risks are distinct and should be considered as such, it is acknowledged that they are generally managed through the same AML/CFT/CPF controls framework. It is however important that relevant staff understand the PF specific threats, typologies and red flags applicable to gambling.

Controls Section

Do you provide training to your staff on Proliferation and Proliferation Financing



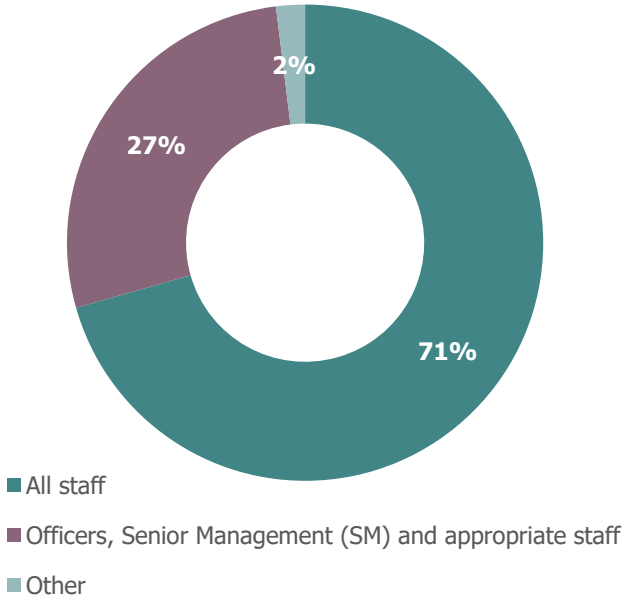
In 2024, 51% of respondents conducted PF training for their staff. In 2026, this has increased to 93% of respondents.

Paragraph 27 of the Code requires for education and training, including refresher training, at least annually, to be provided.

The training must make those aware, among other things, of AML/CFT legislation, personal obligations, policies / procedures and controls and any new developments.

These requirements include PF because the Code's definition of terrorist financing incorporates proliferation financing. Relevant staff should therefore receive training on applicable PF risks, typologies, red flags and obligations such as screening, freezing accounts of designated persons and reporting suspicious activity and assets freezes or sanctions breaches.

Who receives PF Training?



In 2024, 40% of respondents offered PF training to all staff, with 52% offering it only to SM or other appropriate staff.

In 2026, this has increased to 71% offering PF training to all staff and 27% to SM or appropriate staff only. Wherever possible, testing of the topic should be considered and feedback from the participants sought. This can greatly help and enhance future training sessions and help with the understanding of the matter by identifying knowledge gaps, encouraging discussion and engagement with staff.

Consideration should also be given to splitting out certain training, such as PF and TF, especially when the recipient of the training material has misunderstood important factors / differences.

Boards and senior management should set a clear tone from the top by ensuring training is appropriately resourced, proportionate to the business model and PF exposure, and aligned with the operators' risk assessments and controls.

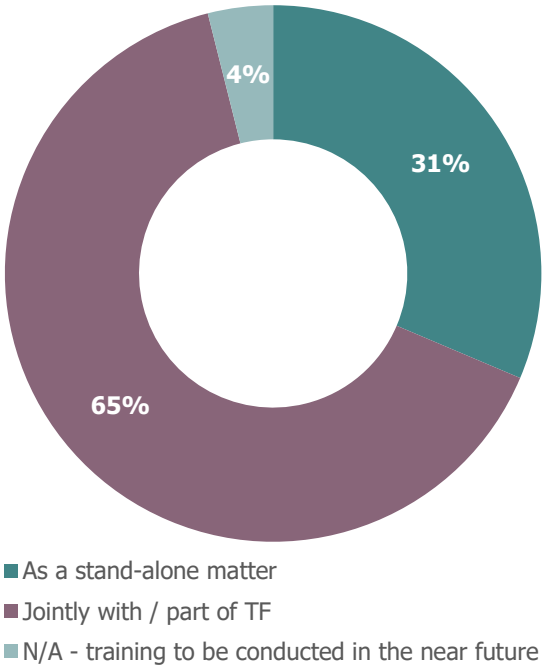
In accordance with paragraph 25 of the Code, the AML/CFT Compliance Officer should monitor the operator's compliance with its AML/CFT obligations and report regularly to the board or senior management. This may cover ML, TF and PF within an integrated compliance monitoring and training framework, reflecting that these risks are generally managed through common systems and controls. However, ML, TF and PF are distinct risks, and the AML/CFT Compliance Officer should provide assurance that relevant staff understand the specific threats,

typologies, red flags and obligations associated with each, having regard to the operator's risk profile.

Reports should address training completion, assessment results, identified knowledge gaps, remedial action and other relevant monitoring and testing, enabling the board to challenge weaknesses, allocate adequate resources and maintain effective oversight of each risk.



How is training for PF provided?

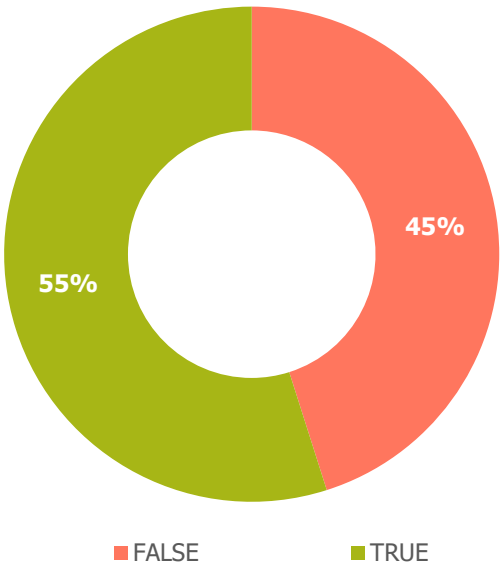


In 2024, 40% provided PF training as part of TF training, and 47% conducted PF training as a standalone matter. In 2026, 65% of respondents provide PF training jointly as part of TF training with 31% providing PF training as a standalone matter.

As noted previously in this report, this can be appropriate where it is proportionate to the operator's business model and PF exposure, as the risks are generally managed through the same overarching AML/CFT controls framework.

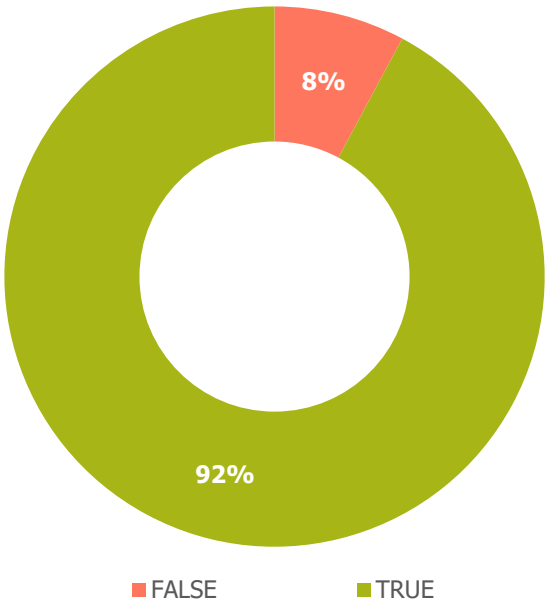
However, operators should ensure that PF is treated as a distinct risk and that relevant staff understand the specific threats, typologies, red flags and obligations associated with it.

Is training provided by a 3rd party, or in conjunction with a 3rd party?



In 2024, 41% reported using a third-party to provide training. In 2026, this has increased to 55% of respondents. Training is typically delivered annually through online platforms and is often provided by a small number of third-party suppliers used across the sector. There is no requirement to have training conducted in-house, however, operators should ensure that training is appropriate and effective for their specific business' risk picture and requirements.

Does the training cover Sanctions?



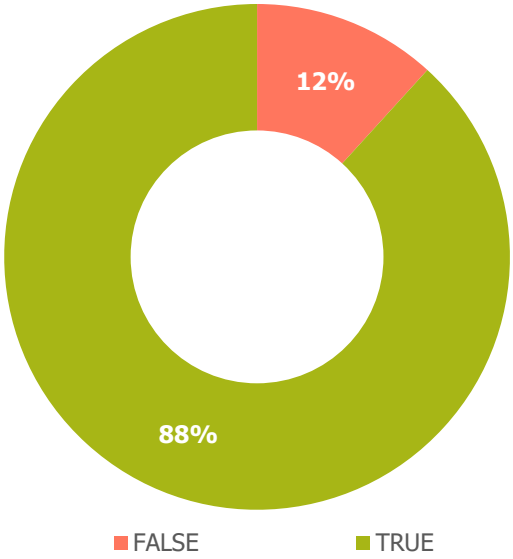
In 2024, 88% of respondents covered sanctions as part of their organisation's training regime. This has increased to 92% in 2026.

Isle of Man Customs and Excise have a number of helpful resources regarding PF, TFS and relevant persons obligations:

- Financial Sanctions Guidance;
- 'Sanctions Relating to PF' webpage on the Isle of Man Government website;
- Customs and Excise RSS Feed.

The GSC's AML/CFT Guidance for Operators explains the obligations arising under the Code. Operators should also refer to the GSC's AML/CFT Guidance for Virtual Assets / Goods, given the PF NRA's identification of potential indirect PF exposure through virtual assets and attempts to avoid traditional financial channels. The guidance supports operators in applying proportionate customer and counterparty due diligence, sanctions and wallet screening, source of funds checks, transaction monitoring, record keeping, and escalation procedures for suspicious activity or potential sanctions matches.

Does the training cover potential risks for you as the Operator?



In 2026, operators were asked about their organisation's specific risks. 88% of respondents said their training covers potential risks for the operator. This is a positive result, although the remaining responses indicate a need to ensure that all operators connect PF training to their own risk assessments, business activities and controls[1].

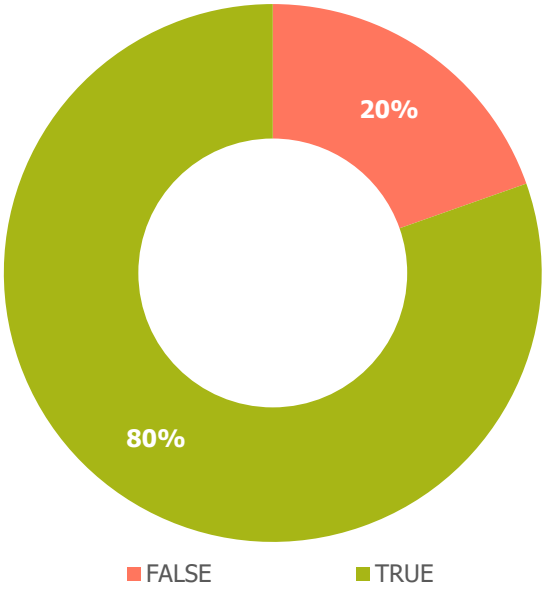
Training should be tailored to the specific operator. The GSC publishes key flags and typologies for operators, but it is also important to cover risks specific to your own business.

For example, an online B2C operator may face indirect PF risk through overseas customers and cross-border payments, while a software supplier may be exposed through the ownership, location or activities of the operators it serves.

Training should therefore use business-relevant scenarios to explain how PF risks may arise, the controls used to mitigate them, and the actions staff must take to identify and escalate concerns.

[1] *This question and the following were asked together in 2024. In 2026, they were split into two distinct questions.*

Does the training cover potential risks & mitigations for your group arising from PF?

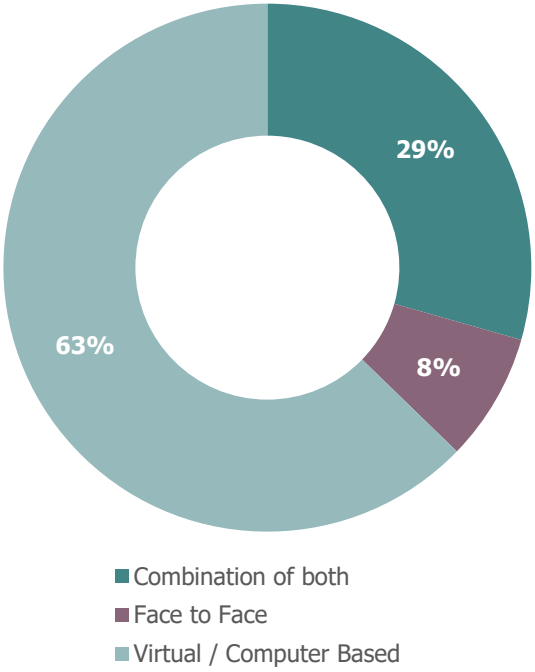


80% of respondents stated that the training covers potential risks & mitigations for their group arising from proliferation financing.

Many GSC licence holders are part of a wider international group that may hold other licences or conduct activities in other jurisdictions. As such, certain risks may arise that relate directly to that business's wider corporate structure.[2] For example PF exposure may therefore arise through group ownership and control, overseas affiliates, shared services, intra-group payments, technology providers, B2B customers or counterparties, and links to higher risk jurisdictions. Training should explain how these risks may affect the Isle of Man operator, the controls used to mitigate them, and the responsibilities of relevant staff.

See the Isle of Man's 2026 Gambling NRA and the IOM FIU's monthly typology reports for more information on risks relating to B2B partners and wider group structures.

What is the primary method of training?



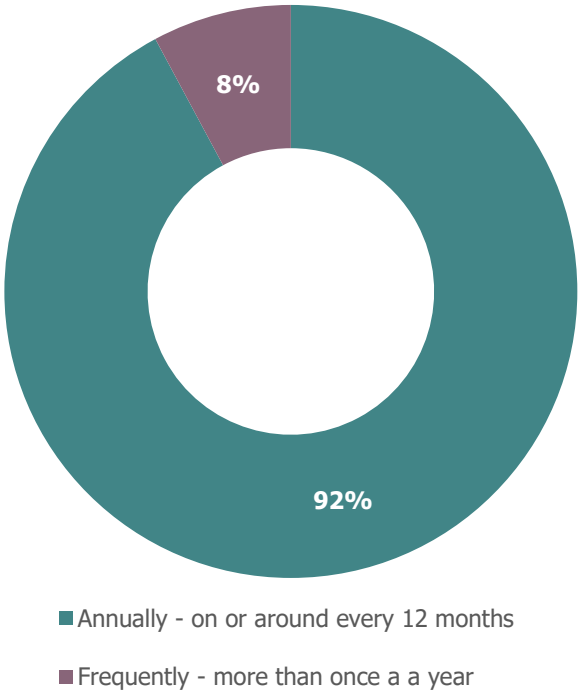
In 2024, 61% of respondents conducted training virtually, and 23% do so as combination of both online and face-to-face content.

In 2026, The majority of respondents (63%) reported that they conduct training virtually. 29% of respondents undertake training via a combination of both online and face-to-face content.

In 2026, fewer respondents conduct training as face-to-face only however, more respondents conduct PF training than in 2024 and that training is conducted to a wider range of staff members. It is not a requirement for training to be conducted in a particular medium, but operators should ensure that any training conducted remotely is still effective and commensurate to their unique risk profile as a business.

[2] *ibid*

How often is training for PF delivered?



In 2024, 84% reported conducting training annually (on/around every 12 months).

In 2026, 92% of respondents reported that they conduct training for PF annually. The GSC Code states that AML/CFT/CPF training must be conducted annually for relevant key staff.

Annual training is a minimum baseline rather than the only point at which staff should be updated. Training must cover new developments, including current techniques, methods and trends in ML, TF and PF.

Where there are significant changes to AML/CFT legislation or the operator's policies and procedures, appropriate training must be provided within a reasonable timeframe.

Operators should therefore communicate relevant NRA findings, sanctions developments, emerging typologies and red flags, and material changes to their business or risk profile promptly, rather than waiting for the next annual training cycle.

Additional Comments Regarding PF Training

A number of respondents are in the process of rolling out formal PF training in 2026, in addition to existing AML training.

Most operators consider PF as part of AML/CFT training, although it is not covered as a standalone training topic. The survey should be read in the context of the Isle of Man's recently published National Risk Assessment suite, including the first standalone PF NRA (published July 2026). Given the PF NRA's recent publication, many operators are still embedding its findings within their risk frameworks. Responses may therefore outline work completed, work in progress and planned next steps.

Additional Context:

TFS and PF Risk on the Isle of Man

Although in accordance with the Island's NRA, Money Laundering remains the principal financial crime risk for the gambling sector, PF exposure may arise indirectly through cross-border customers and payments, higher risk jurisdictions, complex ownership or control structures, B2B relationships, virtual assets, and activity that obscures a customer's identity or location. Operators must therefore assess and mitigate the PF risks specific to their business models.

Under FATF Recommendation 7, countries must implement targeted financial sanctions (TFS) relating to PF without delay. All persons must immediately freeze the funds or other assets of designated persons and report any assets frozen, or actions taken.

In the Isle of Man, these obligations are implemented through the Terrorism and Other Crime (Financial Restrictions) Act 2014 ("TOCFRA"). The Sanctions Act 2024 and the Sanctions (Implementation of UK Sanctions) Regulations 2024 also give effect to UK sanctions regimes made under the UK Sanctions and Anti-Money Laundering Act 2018 ("SAMLA").

Additions, amendments and delistings are announced through news releases on the Sanctions and Export Control website, which also provides a sanctions RSS feed.

The FSA and GSC issue timely email notifications following notification from Customs. However, a UN designation takes effect automatically by operation of law and binds all persons in the IOM immediately; no further domestic action or notification is required.

Appendix

List of PF Survey Questions

Awareness of PF

1. Did your organisation participate in the previous PF survey issued via Strix in 2024?
2. If yes, would you say awareness of PF within your organisation has improved since the previous survey?
3. Since completing the previous survey, or since becoming licensed if later, has your organisation taken action to enhance its understanding of PF?
4. Have you incorporated findings from Isle of Man's 2025/2026 NRA into your training programme?
5. If no, or in progress, when do you plan to have this completed?
6. Does your Business Risk Assessment refer specifically to PF? (as opposed to being combined with Terrorist Financing and/or other sanctions measures).
7. In your own words, how would you say your business is affected by PF?
8. In your own words, how would you say the Isle of Man is affected by PF?

PF Risk

1. Have you considered how PF risk could arise through indirect exposure, rather than direct trade exposure, within your business model?

Indirect Exposure

1. Has your organisation considered whether PF risk could arise through ownership and control structures, payment flows, suppliers, software providers, or virtual assets exposure?
2. Which of these statements do you think best reflects the general awareness of Proliferation and Proliferation Financing (PF) within your organisation?
3. How does your business remain up to date with developments regarding PF? (e.g. GSC, FSA outreach, third parties...)
4. Have you made changes to your internal AML/CFT policies due to PF Outreach from the GSC or partner agencies? (for example, the PF video series in 2024?)
5. Have the GSC's typology and red flag documents enhanced your understanding of gambling specific PF risks?
6. Has the FIU's Online Gambling Typologies report enhanced your understanding of the gambling specific PF risks?
7. Would you say your awareness of specific typologies (for example DPRK IT workers) has improved following GSC outreach?
8. How does your business communicate developments regarding PF to staff?

Training

1. Do you provide training to your staff on Proliferation and Proliferation Financing?
2. Who receives PF Training?
3. How is training for PF provided?
4. Is training provided by a 3rd party, or in conjunction with a 3rd party?
5. Who is the 3rd party who provides the training?
6. Does the training cover Sanctions?
7. Does the training cover potential risks for you as the Operator?
8. Does the training cover potential risks & mitigations for your group arising from PF?
9. What is the primary method of training?
10. How often is training for PF delivered?