

National Risk Appetite Statement (eGaming) FAQs

May 2025

The Isle of Man takes its international responsibilities very seriously and seeks at all times to protect its communities and businesses from the harms caused by financial crime. The FAQs below explain more about the National Risk Appetite Statement published in May 2025 in response to global threats within eGaming activities.

1. Who does this statement apply to?

This National Risk Appetite Statement (“NRAS”) applies to all entities undertaking or planning to undertake activity in the Isle of Man regardless of their licence or registration status.

It is particularly important for any type of business, licensed and / or regulated or not, which intersects with the eGaming industry.

2. What is the Isle of Man’s risk appetite?

Based on information that is publicly available concerning the relevant typologies and threats, the Isle of Man currently has a limited risk appetite for business in the eGaming sector where there is ownership and/or control from East or Southeast Asia.

3. Do I need to exit relationships with connections to East or Southeast Asia?

Activities or jurisdictions mentioned in the NRAS are not expressly prohibited. However, you must adequately consider any identified risks posed by the relationship, in line with any procedures and controls for taking a risk-based approach. Enhanced measures in line with AML/CFT legislation must be applied where higher risk factors are present.

4. Does this mean I can't take on new business from certain jurisdictions?

Activities or jurisdictions mentioned in the NRAS are not expressly prohibited. However, you must adequately consider any identified risks posed by the relationship, in line with any procedures and controls for taking a risk-based approach. Enhanced measures in line with AML/CFT legislation must be applied where higher risk factors are present.

5. What jurisdictions are covered in the East and Southeast Asia region?

The East and Southeast Asia region covered in the NRAS is the jurisdictions defined by the United Nations.

The jurisdictions captured in this region by the United Nations are as follows:

East Asia	Southeast Asia
China	Brunei Darussalam
DPR Korea	Cambodia
Hong Kong SAR	Indonesia
Macao SAR	Lao PDR
Japan	Malaysia
Mongolia	Myanmar
Republic of Korea	Philippines
Taiwan PoC	Singapore
	Thailand
	Timor-Leste
	Viet Nam

Source: [United Nations Statistical Yearbook \(Nov 2024\)](#) (page 519)

Please note that this list covers only the East and Southeast Asia region, entities should also consider other countries and jurisdictions outside of this list that are identified as posing a higher risk, particularly those in the FIU Typologies document.

6. Does this mean that I can't do business with the eGaming sector?

Activities or jurisdictions mentioned in the NRAS are not expressly prohibited. However, you must adequately consider any identified risks posed by the relationship, in line with any procedures and controls for taking a risk-based approach. Enhanced measures in line with AML/CFT legislation must be applied where higher risk factors are present.

7. When do I need to take action?

The publication of this NRAS is considered to be a trigger event therefore you should take action immediately upon publication of this statement.

8. What action do I need to take?

Review your risk framework, including any relevant customer risk assessments and business risk assessments in line with internal policies and procedures for a trigger event based on the content of the Statement including activities and jurisdictions.

For new business, all Isle of Man entities must consider identified risk factors and ought not enter into new relationships where there is an accumulation of higher risk factors present that cannot be appropriately mitigated.

9. What constitutes an accumulation of higher risk factors?

Where there are multiple higher risk factors, such as, but not limited to, those outlined in the Statement and the separate FIU Typologies document.

10. Is this list of higher risk factors exhaustive?

No, as per the AML/CFT legislation, the Business Risk Assessment, Customer Risk Assessments and Technology Risk Assessments must have regard to any relevant risk factors and any relevant guidance issued by the competent authorities.

11. Is there any other information I should consider?

- An entity's risk framework, in particular its Business Risk Assessment and any associated risk appetite statement
- FIU Typologies documents
- National Risk Assessment
- Financial Crime Strategy
- Relevant guidance issued by the competent authorities
- All available relevant open-source information

12. Will the regulator automatically reject my application for a licence if there are any higher risk factors present?

No, the regulator will not automatically reject your licence application, however, it should be noted there is an extremely limited appetite to grant a licence where higher risk factors are present. All licence applications are considered on a case by case basis. Where there is an accumulation of higher risk factors, either from the NRAS for eGaming, or any other source of information, then the application will be subject to enhanced measures. General examples of enhanced measures may include enhanced due diligence on ownership and management, AML/CFT programme requirements, licence conditions and on-going monitoring.

13. What will the GSC do with existing licences?

The GSC is undertaking work to review its estate and its internal policies and procedures. As part of this work, it will seek to take any appropriate action in accordance with the NRAS for eGaming.

14. How does the National Risk Assessment ("NRA") fit into this?

The Island will publish a wider NRAS for all business activities and sectors once the NRA process has been completed in 2025.

The NRA identifies and assesses the money laundering, terrorist financing and proliferation financing risks the Isle of Man faces, and sets out how they should be mitigated.

The NRAS articulates the level of risk the Isle of Man is willing to accept in different areas, based on the NRA's findings. It helps guide policy decisions, resource allocation, and supervisory focus.

The eGaming focused NRAS is in response to risks identified in the public domain and as part of operational activities undertaken by the competent authorities.

15. When will the wider NRAS be published?

The wider NRAS that will consider all business activities and sectors will be published once the NRA process is complete, in Q4 2025.

16. When will this NRAS be reviewed?

As part of the wider NRAS at the end of 2025. This eGaming Statement will be incorporated into the NRAS being developed at the end of the year to provide one document across all sectors and activities.

17. How often will the NRAS be reviewed?

The wider NRAS will be reviewed annually and updated when necessary, following those reviews. Additional reviews will also be undertaken following trigger events such as the NRA, or where the threat picture materially changes.

18. Why is this NRAS being published now?

Given information that is available in the public domain and as part of closed sources available to the Island's competent authorities, the identified risks have been carefully considered. To ensure an all-Island approach to countering illicit activity, clear communication of a National Risk Appetite Statement provides the strategic foundation for aligning supervisory priorities, resource allocation and private sector compliance. This ensures a consistent understanding of our national risk appetite, across both public and private sectors enabling a proportionate and targeted response to ML, TF and PF risks.

19. What was the methodology for the NRAS?

The NRAS identifies risks that are present in the public domain, closed sources available to the authorities as part of their day-to-day operational activities and relevant typologies and strategic analysis.

20. Will there be changes to the FSA/GSC Guidance?

The regulators will review their Guidance in due course in line with this NRAS and the wider NRAS that will be published later in 2025.

21. I've reviewed my customer relationship and whilst I don't have a suspicion of ML/TF/PF based on activity reviewed, I do have information that may assist the FIU in its general functions. What should I do?

You can provide relevant information to the FIU via its secure intelligence system, Themis, under Section 24 of the Financial Intelligence Unit Act 2016.

22. Should I contact the FIU directly in relation to question I have regarding the content of the eGaming Typologies document?

If your query relates to the content of the FIU Typologies document, and the general typologies described only, the FIU will try and answer any queries.

23. When reviewing my existing customer base, I formed a suspicion of money laundering. Following the submission of a suspicious activity report (SAR under POCA) to the FIU, should I also report this to the Regulator?

No, please report via Themis in the normal manner.

24. Who do I contact if I am having issues with my Themis log in, or need to register?

Please email fiu@gov.im and assistance will be provided by the FIU.

If you have any further questions in relation to the National Risk Appetite Statement for eGaming, which have not been addressed as part of the FAQs, please contact the AML/CFT Policy Office at amlcft@gov.im.

