



License Reclassification

15th October 2025

Contents

Introduction.....	3
Scenario 1: B2C license certificate issued under NOOGH for B2B operations.	3
Requirements	3
Procedure	4
Invoicing	4
Scenario 2: B2B license certificate issued under NOOGH for B2B operations.	5
Requirements	5
Procedure	5
Scenario 3: NOOGH B2C License. Business Model Change: B2C → B2B	6
Direct transition not possible	6
Revocation Conditions	6
Procedure	7
Scenario 4: NOOGH B2B License. Business Model Change: B2B → B2C.....	7
Direct transition not possible	7
Revocation Conditions	8
Procedure	8
Conclusion.....	8

Introduction

The Curaçao Gaming Authority (CGA) announces the framework for converting certain B2C licenses issued under NOOGH into B2B licenses under the new LOK regime.

Under the NOOGH legislation, certain entities that would be classified as B2B operations under the LOK framework were classified as B2C on (1) the portal and/or (2) the license certificate (hard and soft copy).

The expiration of the Orange Seal (Certificate of Operations) will come into effect on the 15th October 2025 effectively bringing the former sublicense system to an end.

Therefore, all operators must ensure that their licenses under the LOK correctly reflect their business activities. Where a conversion or reclassification is required, the CGA has outlined the specific requirements and procedures to be followed.

Scenario 1: B2C license certificate issued under NOOGH for B2B operations.

In this scenario the license holder was issued with

1. A B2C license certificate (hard copy and soft copy)
2. B2C notation throughout the portal

The license holder is a B2B entity, providing services to B2C operators, but is not now and never has operated any B2C facing domains under the NOOGH or LOK license, i.e. the license holder is not involved in any way in the Player Account Management (player data, payments).

Operators in this category must transition to a LOK B2B.

Requirements

- Updated business plan (if necessary)
- Supplier License Application Form
- Business and Corporate Information Form
- Certifications for games/platform
- Information Security Policy
- Declaration of Good Standing.

Procedure

1. Operator submits a ticket in the CGA portal.
2. The CGA will then switch the portal status from B2C to B2B to allow documents to be uploaded.
3. The operator must upload the required documentation as above and inform the CGA via ticket once the upload is complete.
4. CGA will review the submission, raise a checklist if additional information is needed.
5. Upon completion of the review, the CGA will confirm its decision
 1. Transition request to B2B is approved: CGA will issue a new B2B license certificate (hard copy and soft copy) as soon as relevant invoicing is settled in full (see below). Portal status remains B2B.
 2. Transition request to B2B is rejected: Status in the portal is returned to B2C, and the operator must upload any outstanding policies required for the B2C license under the LOK.

Invoicing

In this scenario, the CGA will have previously issued two invoices for the B2C license (reference LOK Fees Policy).

Depending on the status of payment the following will apply

1. Neither invoice was paid by the operator: CGA voids both invoices and issues a new invoice for the B2B license fee.
2. The operator paid the CGA invoice only: CGA voids the National Treasury invoice and issues an extra invoice for any outstanding fees.
3. The operator paid both invoices: CGA issues an extra invoice for any outstanding Supervisory Fee and provides instructions for the license holder to get reimbursement for the amount paid to the National Treasury.

Scenario 2: B2B license certificate issued under NOOGH for B2B operations.

In this scenario the license holder was issued with

1. A B2B license certificate (hard copy and soft copy)
2. B2C notation throughout the portal

The license holder is a B2B entity, providing services to B2C operators, but is not now and never has operated any B2C facing domains under the NOOGH or LOK license, i.e. the license holder is not involved in any way in the Player Account Management (player data, payments).

Operators in this category must transition to LOK B2B.

Requirements

- Updated business plan (if necessary)
- Supplier License Application Form
- Business and Corporate Information Form
- Certifications for games/platform
- Information Security Policy
- Declaration of Good Standing.

Procedure

1. Operator submits a ticket in the CGA portal.
2. The CGA will then switch the portal status from B2C to B2B to allow documents to be uploaded.
3. The operator must upload the required documentation as above and inform the CGA via ticket once the upload is complete.
4. CGA will review the submission, raise a checklist if additional information is needed.
5. Upon completion of the review, the CGA will confirm its decision and upon approval of the transition request any invoice/payment discrepancies will be addressed in line with the LOK Fees Policy.

Scenario 3: NOOGH B2C License. Business Model

Change: B2C → B2B

A B2C license issued under NOOGH was originally used for business operations conducted as B2C. However, the operator has since changed its business model to B2B. In this case, if the license holder requires a B2B license under the LOK framework to ensure it accurately reflects the operator's current activities it must follow the procedure below.

Note: Until 24th December 2026 a B2B license is not mandatory for entities providing services to Curacao licensed B2C operators. Holding a license is at the discretion of entity.

Direct transition not possible

It is not possible to directly transition from a NOOGH B2C license to a LOK B2B license in this situation, as the B2C operations need to be wound down in accordance with CGA requirements.

In this situation the B2C NOOGH license is revoked by the CGA (subject to conditions outlined below), and the operator must commence an application for a LOK B2B license.

Any company may hold one or multiple B2C licenses or one or multiple B2B licenses. But a single company may not hold a combination of B2B and B2C licenses. Therefore, the operator must wait for one license to be revoked before starting an application for the other.

Alternatively, the operator can start a new licence application under a different company. In this case, steps 6 to 8 of the Procedure outlined below may run alongside steps 1 to 5, with each applying to a separate entity.

Revocation Conditions

1. Letter signed by the Managing Director stating the request to revoke the license and the reason for the request.
2. Information regarding the number of player claims and player deposits.
3. An explanation of how the operator will handle outstanding player claims and deposits.
4. Information about the transfer of the players database (if applicable).
5. The B2C license will only be revoked if the CGA is satisfied that the B2C operations have been properly wound down, that the players are protected and funds are returned.
6. The B2C license is active until every player has been paid.

7. The operator is responsible for all license conditions, policies and procedures up to the point the license is revoked.

Procedure

1. The operator sends a ticket in the portal notifying the CGA of the business model change.
2. CGA informs the operator that to proceed with the request the current license must be revoked by the CGA at the request of the operator and instructs the operator to send the letter signed by the Managing Director to egl-applications@cga.cw.
3. CGA reviews the documents/information received and proceeds with the license revocation under the conditions attached thereto.
4. CGA informs the operator once the request for license revocation has been approved.
5. Operator commences wind-down process in accordance with established requirements and on completion to the satisfaction of the CGA the B2C license will be terminated.
6. The entity can now create a new application for the LOK B2B license in the portal. All forms and enclosures required for a new application must be submitted accordingly.
7. Once the B2B application is submitted, the invoice for the B2B application fee as outlined in the LOK Fees policy will be issued.
8. Upon receipt of payment, the CGA will begin the review of the B2B application according to the LOK application process.

Scenario 4: NOOGH B2B License. Business Model

Change: B2B → B2C

A B2B license issued under NOOGH was originally used for business operations conducted as B2B. However, the operator requires to change its business model to B2C. In this case, the license must hold a B2C license under the LOK framework to ensure it accurately reflects the operator's current activities. The B2C operations may not commence until the operator holds an approved B2C license.

Direct transition not possible

In this situation the NOOGH B2B license needs to be revoked under the conditions outlined below and the operator must commence a new B2C application on the CGA portal.

Any company may hold one or multiple B2C licenses or one or multiple B2B licenses. But a single company may not hold a combination of B2B and B2C licenses. Therefore, the operator must wait for one license to be revoked before starting an application for the other. Alternatively, the operator may choose to commence the application for the new license under a new/separate company.

Revocation Conditions

Letter signed by the Managing Director stating the request to revoke the license and the reason for the request.

Procedure

1. The operator sends a ticket in the portal notifying the CGA of the business model change.
2. CGA informs the operator that to proceed with the request the current license must be revoked by the CGA at the request of the operator and instructs the operator to send the letter signed by the Managing Director to egl-applications@cga.cw.
3. CGA reviews the documents/information received and proceeds with the license revocation under the conditions attached thereto.
4. CGA informs the operator once the request for license revocation has been approved.
5. The operator can now create a new application for the LOK B2C license in the portal. All forms and enclosures required for a new application must be submitted accordingly.
6. Once the B2C application is submitted, the invoice for the B2C application fee and 1 UBO will be issued.
7. Upon receipt of payment, the CGA will begin the review of the B2C application according to the LOK application process.

Conclusion

The CGA reminds all operators that it is their responsibility to ensure that their licenses accurately reflect the nature of their operations under the LOK regime. Failure to complete the transition as outlined will place operators in breach of Curaçao law.

The Authority remains available to assist operators throughout this process. All communication should be conducted via the CGA portal to ensure transparency and traceability.