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# The Rules of the Game are Changing

How the New Legal Framework  
Influences the Future of the  
Gambling Industry?

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## Introduction

The games of chance industry is facing significant changes, due to the latest amendments to the Law on Games of Chance, whose implementation began in January 2025, placing new challenges for organizers, as well as the players of said games. While the main purpose of these amendments is to strengthen supervision over games of chance, improve player protection and prevent potential misuse, there is a simultaneous change in the business flow of the host due to new operative, technical and financial obligations. This results in the entire market structure of the games of chance industry being significantly altered.

From amendments in licensing organizers and prescribed fees to clearly defined prohibitions and conditions for business premises, the new regulations permeate the entire ecosystem of the industry. In addition, changes which signal the legislator's focus towards increasing responsibility of the games of chance organizers, such as obligatory age verification, the possibility of their self-exclusion and self-limitation, as well as stricter surveillance procedures by the Games of Chance Administration. Thus, the following text provides an analysis of the crucial aspects of the new legal regulations, including their impact on the further development of the games of chance industry.

## **I Basic Concepts of the Law on Games of Chance - Starting Point for Understanding the Amendments**

Na Firstly, it is important to introduce the basic concepts of Games of Chance. Thus, we highlight key terms which will further the understanding of the essence and the scope of changes implemented by the new regulations.

1. **Organizers** are legal persons or entrepreneurs who, based on a permit from the Government, i.e., the approval from the Administration, have the right to organize games of chance.
2. **Games of Chance** are games in which participants invest monetary funds with the aim of gaining a monetary profit or other assets, in accordance to the previously defined rules of the game.
3. **Classical Games of Chance** are games in which multiple players participate with the aim to win a previously determined winning fund. Participants compete to become the sole or partial winner of said fund, and the results are often random, depending on the rules of the game. This type of game includes:
  - **Basic Classical Games of Chance** such as the lottery, sport forecasts, lotto, keno, raffle, bingo and similar games, where winners are determined by random selection or predictions of the event outcome.
  - **Other Classical Games of Chance** such as font, SMS lottery, as well as other games of chance within the catalog of games of chance.

4. **Special Games of Chance** are games where participants play against each other or against the organizer, with the aim to obtain a profit based on their stakes, and they include:

- **Games of Chance in Arcades** - games played in special venues (arcades), where players play against the arcade or against each other, using props such as balls, dice, cards or other objects.

***Example:** Games such as roulette or poker, where players can compete with the arcade or with each other to win the prize.*

- **Games of Chance on Machines** are games played on machines (such as slot machines), where players place bets for the chance of winning a prize, according to the pre-determined rules.

***Example:** If a player manages to guess a specific symbol combination on a slot machine, they will win the prize.*

- **Games of Chance - Betting Games** are a specific type of game where participants place their bets on the outcome of real events (such as sports matches, horse and dog races, dancing or singing competitions or musical contests) or virtual events, organized by the organizer. The most important characteristic of these games is that the circumstances, which determine the outcome, must be unknown and independent, so that neither the organizers nor the players can influence the outcome. The prize amount and the stakes are determined in advance, while placing the bets, and cannot be changed afterwards.

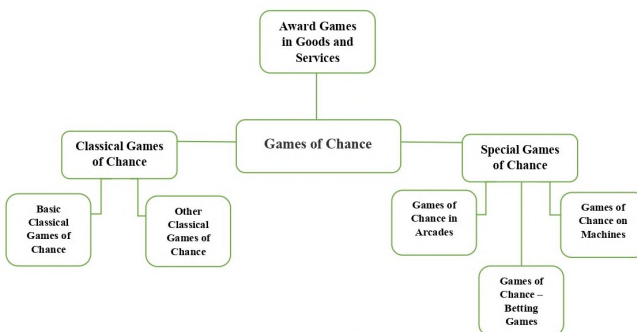
***Example:** Betting on the outcome of a football match, where the player places the bet on the winner, however, said outcome remains unknown until the end of the match.*

5. **Award Games in Goods and Services** are games organized by a legal entity or entrepreneur for commercial and other purposes, allowing all participants an equal chance to win an award in the form of goods or services, which must be predetermined.

**Example:** An award game organized by an appliance store, where all participants have the chance to win a device of their choosing, valued up to 10.000,00 RSD. Participants take part by purchasing a product and filling out a form, giving everyone an equal opportunity to win a pre-determined prize.

6. **Games of Chance Through Means of Electronic Communication** include all classical and special games of chance, when they are organized over electronic devices such as the internet, telephone, television, radio, SMS, as well as any other form of electronic communication.

**Example:** Online casinos where players participate in games such as roulette and poker, placing bets and playing against organizers and other players, all via a specialized platform.



Games of Chance Categories Representation

It is interesting that, for the first time, these amendments to the Law introduce precise explanation of the terms ticket, tournament, jackpot, player verification and multi-vending machines, which up until now had no clear definition.

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## **II New Market Rules – Key Changes in the Law**

### **1. Licensing Organizers – What is Different?**

The amendments to the Law on Games of Chance introduce important changes, which will significantly impact organizers of special games of chance – from machines, to betting, to games played through means of electronic communication. These changes primarily consider the rules on licensing organizers, digitalization of the process, as well as the obligation to timely perform the duties of games of chance.

The most significant change is the possibility of extending the existing approval for organizing games of chance by an additional ten years. Namely, the previous regulation demanded that the organizers reapply after their approval expired, which in turn demanded gathering extensive documentation and filling out complex administrative requests. The amendments simplify these requests immensely, given that instead of issuing a new license, a simple extension of the current approval is allowed. Additionally, the deadline for issuing requests has been moved from 60 to 90 days before the expiration of the current approval, giving the organizers more time to fulfill additional obligations they face. Furthermore, it is important to note that the entire process is now fully digitalized, i.e., it is exclusively conducted electronically, through the Administration's information system, further diminishing the organizers' administrative burden and allowing the Administration to make faster decisions on the applications.

After obtaining approvals, organizers shall perform their business at the issued location, no later than 120 days from the date of issuance. Otherwise, the approval will be revoked without the possibility of approving the same location for games of chance. It seems that these measures are the legislator's way



of preventing a long delays in opening new locations and ensuring for the issued approvals to be actually used for the intended purposes.

## **2. Increased Fees for Organizing Games of Chance in Light of New Legal Amendments**

The new legislation introduces important changes in terms of fees which the organizers of games of chance pay to the state budget of the Republic of Serbia. Organizers are currently facing increased business expenses which relate both to the fees for obtaining approval to conduct games of chances, and the fees for actually organizing gambling games. It seems that these novelties are mostly influencing organizers of special games of chance in arcades, on machines, in betting rooms, as well as for those who organize games through means of electronic communication.

When it comes to specific changes, the fee increase applies to special games of chance in gaming establishments conducted through means of electronic communication, where instead of the previous 10%, it now amounts to 15% of the base, which is the difference between total payments received and total payments made. Additionally, for games that are (re)broadcast, a mandatory monthly fee of 25% of the mentioned base has been introduced. Fees for organizing games in gaming establishments, on slot machines, and in betting shops have also been increased, both through higher percentages on generated revenue and through an increase in the minimum monthly amounts per table, machine, or location. Furthermore, fees for issuing and renewing licenses and approvals for organizing games of chance have been significantly increased. On the other hand, licenses for special games in gaming establishments now require twice the previous amount, while organizers conducting games via the internet face a threefold increase in costs for obtaining the necessary approval. To better illustrate the specific changes, the following section presents the differences between the previous and new fee amounts that game organizers are required to pay:

No.	Necessary Payment Fee	Previous Amount	New Amount
1.	Fees for issuing approvals for organizing special games of chance on machines	25,00 a month per slot	50,00 EUR a month per slot
2.	Fees for issuing approvals for organizing special games of chance / betting games	100,00 EUR a month per gambling room	200,00 EUR a month per gambling room
3.	Fees for issuing approvals for organizing special games of chance through means of electronic communication	2.500,00 EUR monthly	10.000,00 EUR monthly
4.	Fees for issuing approvals for organizing special games of chance in arcades	500.000,00 EUR	1.000.000,00 EUR
5.	Deposit / Bank guarantee of games of chance organizers through means of electronic communication	300.000,00 EUR	500.000,00 EUR

During the public debate on the proposed amendments to the law, numerous objections were raised regarding the increase in fees, but most of them were rejected. The key justification was that the increase is justified and proportionate to the economic capacity of the organizers and that, in this way, the state aims to secure additional budget revenues (as it has been announced that revenues will increase by as much as 29%), while simultaneously maintaining the stability of the gambling market. Considering all the above, it is clear that the new fee regime imposes significant financial obligations on organizers but also represents part of a broader state strategy for regulating and controlling the gambling market

### **3. Implementation of New Rules in the Games of Chance Venues: Surveillance, Prohibitions and Expert Approvals**

One of the key obligations of gambling organizers is to ensure continuous audio and video surveillance in gambling premises, including gaming tables, cash registers, entrances and exits of gaming establishments, slot machines, players, and visitors, in order to prevent violations of game rules and, if necessary, enable timely intervention by the competent authorities. In addition to this, organizers are now subject to an additional requirement—providing the Games of Chance Administration with a live-streaming link to their video surveillance system via an information and communication system, allowing the authority to access recordings and monitor activities in games of chance establishments in real time. Although the purpose of this regulation is to ensure greater control by the Administration in order to prevent irregularities and protect players' interests, organizers have expressed serious dissatisfaction, considering it unnecessary and burdensome. They argue that the state is excessively interfering in their daily operations and undermining their business autonomy. However, it remains to be seen how this measure will affect the implementation of their business strategies in the future. Apart from this, the mandatory retention period for video surveillance recordings has been extended from the previous 30 days to 90 days.

Another novelty is the prohibition of serving food and alcoholic beverages with more than 5% of alcohol in gambling rooms and arcades, with the obligation to specify said prohibition in a visible place. Organizers have a deadline until 1st July 2026, to comply their operations with these requests, otherwise, a monetary fine shall be proclaimed in case of violation; this maintains a serious legislative approach in reducing potentially hazardous effects, incurred by relating gambling to food and drinks consumption. Additionally, the new requirement mandates a clear and visible display of addiction disease posters

and facilities for recovery, inside as well as outside the premises in which the games are organized. Finally, stricter requirements have been introduced regarding the proof of compliance with the prescribed distance between betting shops and slot clubs from educational institutions. As a reminder, according to the provisions of the Law on Games of Chance, the minimum distance of these establishments from primary and secondary schools attended by children, minors, and young adults under 19 years of age cannot be less than 200 meters. When it comes to proving compliance with this requirement, the previous practice relied solely on a certificate issued by the Republic Geodetic Authority based on the measurement of spatial distance. However, the new rules have introduced an additional requirement—the mandatory acquisition of an expert opinion from a traffic specialist. The reason for this is the legislator's aim to ensure a more accurate assessment of the accessibility of establishments where gambling activities are organized, taking into account various factors, such as traffic connectivity and the possibility of unhindered access to gambling premises. In this regard, it is concluded that the stricter criteria are intended to further reduce the accessibility of gambling activities to minors and young adults, thereby strengthening the mechanisms for protecting young people from the potential negative consequences of this form of entertainment. Therefore, it is expected that the new rules will contribute to a more consistent implementation of legal provisions and prevent possible abuses regarding the determination of the distance of these establishments from educational institutions.

#### **4. Player Protection - Age Verification, Self-Exclusion and Self-Limitation**

A new requirement for special games of chance organizers conducted through means of electronic communication is a mandatory player verification, which must be completed before allowing the player to register for participation in games. Player verification is a simple, yet important step and it implies the age

verification of the person registering to participate in the games of chance through the internet, by reviewing the date of birth on the ID of said person, to ensure only adults partake in this form of fun. Therefore, this procedure must precede the creation of a player account, meaning that it is strictly prohibited to register a player account or allow participation in games of chance through means of electronic communication without prior age verification. What makes player verification important is its role in protecting minors. Although the law explicitly forbids their participation in gambling, player verification seems to be a necessary measure to ensure that this rule is actually followed in practice. Hence, every player registering at an organizer's platform must go through this procedure, allowing organizers to confirm with certainty that the registration was completed with proper checks.

Further, regarding changes related to responsible games of chance organization, players are now allowed to take measures for self-exclusion and self-limitation. Hence, players will now have the right to request exclusion from all games of chance for a specified period of no less than 24 hours or permanently, with the condition that it cannot be revoked before 12 months have passed. On the other hand, self-limitation allows players to set a limit on the amount they can deposit into their account to promote responsible spending and reduce the risk of financial problems. Organizers of special games of chance through means of electronic communication are required to provide players with these options and act promptly on any self-exclusion or self-limitation request. Once a player submits a request, organizers must immediately block access to the player's account or limit the deposit, depending on the type of request submitted. Additionally, it is the organizer's duty to provide the Gambling Administration with all relevant player data for those who have self-excluded or set a limit (including the player's unique identification number, the request submission date, and the exclusion period). The Administration will then share this data with all organizers where the player has open accounts, ensuring that the player is excluded from all platforms while their self-exclusion request is in effect.

## **5. Changes in Ownership Structure for Games of Chance Organizers**

Contrary to the regular acquisition of shares or stakes in commercial companies, in the case of organizers of special games of chance on slot machines, betting games, and special games of chance through means of electronic communication, an additional step is introduced—obtaining prior approval from the Games of Chance Administration. Thus, if someone is interested in purchasing shares or stakes, or in joining as a new member or shareholder in the capital structure of the organizer, they must submit a request to the Administration, along with the appropriate documentation proving compliance with the legally prescribed conditions. This process is fully digitalized, meaning that the application is submitted exclusively online, via the Administration's information and communication system. Upon receiving a complete request and documentation, the Administration is required to make a decision within 30 days, either approving or rejecting the request.

At this point, we reach the question: what happens if this step is skipped, or if the change in the ownership structure is initiated without the prior approval of the Games of Chance Administration? First and foremost, the person making such a change may face financial consequences in the form of a monetary fine for committing an offense. Additionally, even if an attempt is made to register the change with the Business Registers Agency without prior approval from the Administration, such an application will be rejected. The reason for this is that the Agency checks compliance with all legal conditions before registering the change, and the lack of the Games of Chance Administration's approval would certainly be a reason for a negative decision on the registration application. Therefore, it can be concluded that without the appropriate decision from the Administration approving the change in the ownership structure of the organizer, it would not be possible to successfully carry out the process

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## **6. Transfer of Organizing Rights in Case of Corporate Changes**

A corporate change represents a form of reorganization in which one company transfers its assets and liabilities to another company, while the members of the transferring company acquire shares or stakes in the acquiring company. Although this option is available to games of chance organizers, until the recent amendments to the law it was not entirely clear whether the rights granted in the form of approvals and consents given to the transferring organizers could be transferred to the acquiring organizer through a corporate change procedure.

The new legal framework for the first time clearly regulates this issue, allowing the rights from approvals and consents to be transferred to the acquiring organizer in the event of a corporate change (although the law only mentions the case of a merger). Nevertheless, it is important to emphasize that this transfer does not happen automatically, and the acquiring organizer is required to meet several additional conditions and obtain prior consent from the competent authority—the Games of Chance Administration.

The request for obtaining prior consent must be submitted electronically, via the information and communication system of the Administration, no later than 30 days from the date the draft contract for the corporate change is published in the Business Registers Agency. Along with the request, the acquiring organizer submits documentation that includes information about the organizers participating in the corporate change, a copy of the published documentation, a list of locations and slot machines the acquiring organizer plans to use, as well as information regarding the organization of games through means of electronic communication, if such an intention exists. The Games of Chance Administration then decides on the request within 30 days, either granting or denying the prior consent. In case of approval, the acquiring organizer is required to meet all legal conditions for organizing the activity within 60 days of the corporate change registration and provide the necessary

evidence to the Administration. At the same time, there is an obligation to establish the use of the Administration's information and communication system for storing, archiving, and exchanging data electronically, with the deadline for compliance being 15 days from the registration of the corporate change. After the Administration reviews the submitted evidence and confirms that all conditions are met, it issues a final decision within 30 days, formalizing the transfer of rights from the approval and consent to the acquiring organizer.

Another important aspect for acquiring organizers concerns the duration of the acquired rights. Specifically, the rights of the transferring organizer pass to the acquiring organizer on the day of the registration of the corporate change and remain valid until the expiration of the approval period that the transferring organizer obtained before the corporate change— in other words, regardless of when the rights are transferred to the acquiring organizer, their duration is exclusively tied to when they were originally granted to the transferring organizer.

## **7. New Penal Policy**

As we were able to witness, the games of chance industry is facing increasingly stringent regulatory requirements, with lawmakers aiming to increase the organizer's responsibility, enhance control over their organizations, and improve player protection, both through the introduction of new obligations and the tightening of penal policies.

Therefore, various sanctions have been envisaged for organizers who violate the new rules, with a particular emphasis on obligations related to player protection and responsible gaming. Organizers who fail to display the prescribed information on addiction prevention or fail to provide data or allow access to records of players who have self-excluded will face fines ranging from 100,000 to 2,000,000 dinars. Sanctions are also provided for non-compliance with technical and organizational



requirements, such as inadequate information systems, lack of continuous audio and video surveillance, or changes in the ownership structure of organizer without prior consent from the relevant authority, as well as in other similar cases.

Furthermore, there have been changes in the way inspection oversight is conducted over organizers of special games of chance. The law now more clearly regulates how inspectors should proceed when irregularities related to the lack of required equipment permits are discovered. According to the new rules, if an inspector discovers that an organizer is using equipment such as slot machines, multi-automat devices, or other devices without the appropriate approvals during field inspections, a ban on the organization of these games will be imposed, along with the seizure of equipment, documentation, and other items used for unauthorized organization. This ban may last for up to 30 days and applies to all types of special games of chance in the business premises where the irregularities were found. If the violation is discovered again, the organizer's approval to conduct special games of chance will be revoked. Thus, if after a ban on organizing games has been imposed, an organizer violates the law again and breaches any of the obligations, their approval to conduct games in that location will be revoked.

Interestingly, the previous law was more lenient towards organizers, as it provided only a temporary ban on activities for 15 or 90 days in case of repeated violations, with revocation of the approval only being imposed after the third violation. Therefore, the new penal measures clearly demonstrate the lawmakers' determination to establish a stricter monitoring system and obligate organizers to fully comply with the law. In this regard, it is observed that, in addition to the repressive function, the stricter penal policy has a strong preventive character, aiming to raise standards in the industry and create more organized and responsible market for games of chance.

## 8. Quick Reviews: Amendments, Deadlines and Sanctions

No.	Area	Current Regulation	Start of Implementation / Compliance	Violation Sanction
1.	Licensing of Organizers	Possible extension of the approval for an additional ten years, with a simplified procedure	Immediately upon the entry into force of the Law	n/a
2.	Start of Business Operations	Introduction of the obligation to commence organizing operations no later than 120 days from the date of approval	Immediately upon the entry into force of the Law	Approval revocation if the organizer fails to start operations within the given deadline;  A monetary fine for the committed offense ranging from 100,000.00 to 2,000,000.00 dinars
3.	Fees for Organizing Games of Chance	Significant increase in fees	Starting from the first day of the following month in which the Law came into force	n/a
4.	Audio and Video Surveillance in Arcades	Mandatory submission of a live monitoring link for games of chance to the Administration	Immediately upon the entry into force of the Law	A monetary fine for the committed offense ranging from 100,000.00 to 2,000,000.00 dinars

5.	Food and Beverage Service in Arcades	Prohibition of serving food and beverages containing more than 5% alcohol in betting shops and slot machine clubs	Mandatory compliance with the stated obligation no later than 1st June 2026	A monetary fine for the committed offense ranging from 100,000.00 to 2,000,000.00 dinars
6.	Display of Addiction Disease Prevention Posters	Mandatory display of posters in a visible place, both inside and outside the premises	Immediately upon the entry into force of the Law	A monetary fine for the committed offense ranging from 100,000.00 to 2,000,000.00 dinars
7.	Proof of Compliance with Spatial Distance from Educational Institutions	Along with the certificate from the Republic Geodetic Authority, an expert opinion from a traffic expert is required	Immediately upon the entry into force of the Law	n/a
8.	Age Verification of Players Participating in Games of Chance Through Means of Electronic Communication	Mandatory age verification of players before registering their user account	Immediately upon the entry into force of the Law	A monetary fine for the committed offense ranging from 100,000.00 to 2,000,000.00 dinars
9.	Player Protection Mechanisms	Introduction of self-exclusion and self-limitation options for players	Immediately upon the entry into force of the Law	A monetary fine for the committed offense ranging from 100,000.00 to 2,000,000.00 dinars
10.	Changes in Organizer Ownership Structures	Prior approval from the Administration required	Immediately upon the entry into force of the Law	A monetary fine for the committed offense ranging from 100,000.00 to 2,000,000.00 dinars
11.	Transfer of Organizing Rights in Case of Corporate Changes	Subject to prior approval from the Administration, transfer of rights to another operator is allowed	Immediately upon the entry into force of the Law	n/a

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### **III Final Reviews and Conclusions**

In light of all that has been discussed, it can be concluded that the amendments to the Law on Games of Chance are focused on the most important areas of this industry, such as technical compliance, player protection, responsible organizing practices, and market regulation. The purpose of these changes is to improve the regulatory framework with the goal of reducing the potential for abuse and increasing organizer responsibility, as the gambling industry, given its inherent risks, requires stronger oversight and stricter business conditions. Thus, it seems that the new regulations strike a balance between the need to maintain the business dynamics in the games of chance sector on one hand, and ensuring strict controls that guarantee responsible operations on the other. By introducing higher financial obligations, stricter regulatory frameworks, and enhanced player protection, the state is laying the groundwork for the long-term stabilization of the market. However, the successful implementation of these regulations will depend primarily on the ability of all industry participants to adapt to the new requirements, as well as on the effectiveness of the competent authorities in enforcing them.