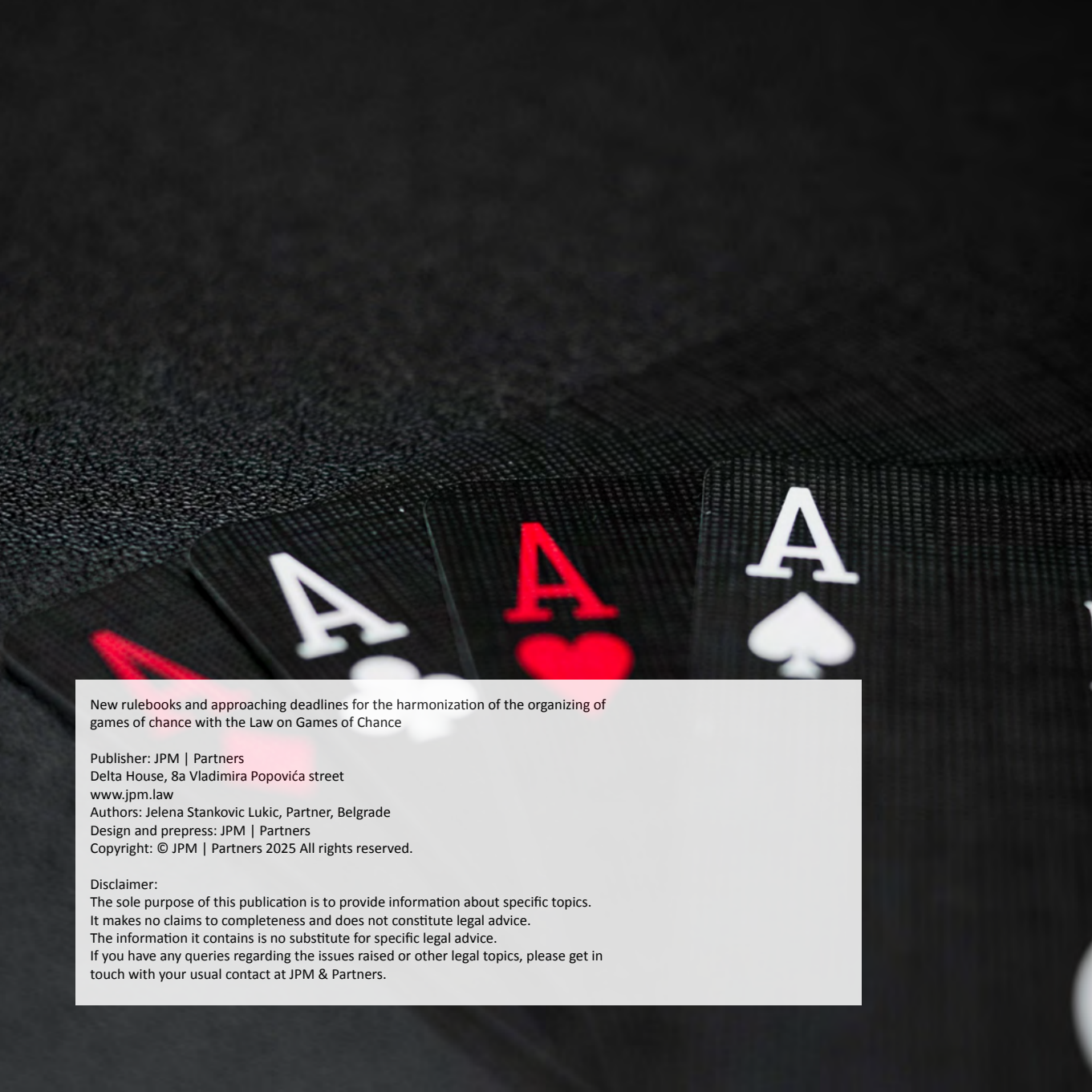




**New Rulebooks and Approaching Deadlines
for the Harmonization of the Organizing of Games of Chance
with the Law on Games of Chance**

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New rulebooks and approaching deadlines for the harmonization of the organizing of games of chance with the Law on Games of Chance

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The Law on Amendments and Supplements to the Law on Games of Chance, adopted by the end of 2024 and applied as from 6 January 2025, has brought several important changes and new legal solutions that have arisen from the needs of practice and market development. In addition to harmonizing the text of the law with the technological development in this area, the amendments to the law introduced new obligations for organizers and a significant increase in fees for obtaining approval and for organizing games of chance.

The deadlines set for the harmonization of business operations with the provisions of the Law have been approaching, and in connection with this, certain new by-laws have been adopted as well as amendments and supplements to the existing regulations by the Games of Chance Administration.

The Law on Amendments and Supplements to the Law on Games of Chance (hereinafter referred to as the Law), adopted by the end of 2024 and applied as from 6 January 2025, has brought several important changes and new legal solutions that have arisen from the needs of practice and market development.

In addition to harmonizing the text of the Law with the technological development in this area, the amendments to the Law introduced new obligations for organizers and a significant increase in fees for obtaining approval and for organizing games of chance.

As life is always faster and more inventive than the law, and in accordance with the rapid growth of the games of chance industry and technology, there was a need to introduce new terms and define new concepts already established in the practice of games of chance, so that the Law defined for the first time the following: bonus, betting machine, ticket, tournament, registration account, promotional account, player verification, stake confirmation, QR code, jackpot and jackpot system, multi-slot machine and determines new measures of responsible organization of games in the form of self-exclusion or self-limitation.

A ban on organizing online games of chance in which players play against each other (Texas hold'em poker, etc.), organizing tournaments outside the casino, and organizing jackpots contrary to the law has been introduced. The prior consent of the Games of Chance Administration is required for the organization of the jackpot. Further, the change in the ownership structure of the organizer is subject to the prior approval of the Games of Chance Administration. The request for approval must be accompanied by a certificate on tax obligation and a non-conviction certificate for the intended purchaser of the shares.

Also, for the first time (if we exclude certain prohibitions that had already been prescribed but without effects or real measures), the Law has now addressed the perennial problem of organizing games of chance by foreign organizers and participation in foreign games of chance.

It is introduced, as a measure that the Games of Chance Administration can take in the case when an unregistered entity (foreign person) organizes online games, the authority of the inspector to make a decision banning those foreign games and to deliver it to the competent authority in order to prevent payment transactions by banks and access to the Internet address by blocking the IP address by the operator of electronic communications.

One of the novelties in the Law is the ability of the Games of Chance Administration to monitor live video surveillance in a casino, through a link that the organizer is obliged to provide. Namely, the organizer is obliged to provide a link through which the authorized representatives of the Games of Chance Administration can monitor the video surveillance live and must keep the video surveillance recordings for 90 days, or even longer if ordered by the Games of Chance Administration. The deadline for compliance with these obligations is 1 January 2026. The same obligation was introduced for slot clubs and betting shops.

As the deadlines set for the harmonization of business operations with the provisions of the Law are approaching, in this regard, certain new rulebooks and amendments to the existing ones have been adopted by the Games of Chance Administration.

At the end of May 2025, with the aim of implementing the provisions related to video surveillance, the Games of Chance Administration adopted amendments to the Rulebook on the detailed conditions for the implementation of audio and video surveillance, the method of keeping documentation and physical protection in the casino, the implementation of video surveillance and the storage of documentation in the slot club and the betting shop.

The said Rulebook determines the technical details for cameras in casinos, automatic clubs and betting shops, so that the view field of the camera must be selected in such a way as to ensure sufficient number of pixels of recorded persons in the immediate vicinity of the location, in order to unambiguously identify them, with the following minimum parameters:

1. Resolution: 1920x1080 pixels (Full HD);
2. Frame Rate: 25 frames per second;
3. Compression: codec H.265 is enabled.

In any case, and as the Law confirms, when processing data, the organizer is obliged to act in accordance with the regulations governing the protection of personal data.

Also, the amendment to the above-mentioned Rulebook defines the obligation of live monitoring of video surveillance in automatic clubs and betting shops, so that communications between the organizers and the Games of Chance Administration, for the purpose of monitoring, are realized by broadband, cable, or optical technologies.

The organizer is obliged to:

1. provide a connection from one permanent (static) IP address from which only the video surveillance data is exchanged, the transmission speed of which meets the needs of the expected traffic, and which must not be less than 50 Mb/s;
2. provide the necessary methods and organize and maintain a private communication network (VPN);
3. protect all computer equipment and local computer network from unauthorized use by third parties; and
4. provide access to persons (through the appropriate username and password and link) authorized by the Games of Chance Administration.

The deadline of 1 January 2026 is also set for harmonizing operations regarding the information and communication system for organizing special games of chance in casinos and the technical and functional characteristics of tables for games of chance. Namely, the organizer of special games of chance in a casino is obliged to use the Casino Management System, which enables the storage, archiving, and exchange of data electronically with the software solution of the Games of Chance Administration for the purpose of monitoring in real time. This system or its part can be acquired by the organizer in ownership, or by the right of use, or to develop it independently in accordance with valid standards.

The term of 1 January 2026 is also a deadline to secure a higher amount of special purpose deposit for organizing special games of chance through means of electronic communication in the amount of 500,000 euros in dinar equivalent or to have a bank guarantee for that amount (compared to the previous 300,000 euros).

By the same deadline, it is necessary to regulate cooperation with authorized entities for providing the service of receiving top-ups to the registration account of players. The organizer will be able to conclude a legal transaction exclusively with an authorized entity based on the prior consent of the Games of Chance Administration and without engaging third parties (intermediaries).

Together with the request for approval, the organizer submits to the Games of Chance Administration:

1. proof that the entity is a legal entity or an entrepreneur based in the territory of the Republic of Serbia;
2. a list of all facilities, with certificates from the Republic Geodetic Institute as proof that every facility is at least 200 meters away from educational institutions attended by children, minors, and young adults up to the age of 19;
3. certificate from the authorized laboratory related to the information and communication system for receiving top-ups of the registration account, whereas this system must be an independent system and shall enable the storage, archiving, and real-time exchange of data with the software solutions of the Game of Chance Administration and the organizer;
4. proof of the ownership structure, all in accordance with the regulations on the Central Register of Beneficial Owners and
5. the concluded service contract, pursuant to which it is not possible to provide the service without the consent of the Games of Chance Administration.

For the first time, the Law prescribes the mandatory elements and provisions of this new service contract related to receiving top-ups of the registration account. However, with respect to the organizer of special games of chance via means of electronic communication that is also approved for organizing games of chance-betting, the payments for player registration accounts registered at that organizer can be received and made at betting shops of that same organizer.

Regarding the organization of games on slot machines and betting, restrictions are introduced for serving food and alcoholic beverages in slot clubs and in betting shops, and only low-alcohol beverages with less than 5% volume are allowed. It is forbidden to have a direct connection between the gaming facility with the area where food and drinks are served. The deadline for compliance with this provision is prescribed until 1 July 2026.

For most of the other obligations introduced by the Law (such as posting of posters on prevention of addiction, introduction of at least 15 tables in the casino, rules on multi-machine, self-exclusion, player verification, bonus, etc.), the Law prescribed that the organizers are obliged to comply within 180 days from the date when the Law started to apply, which deadline is the end of June/beginning of July 2025.

In order to implement the Law, the Games of Chance Administration, in addition to the aforementioned rulebook, has also adopted other bylaws, i.e., new rulebooks and made amendments to the existing ones.

During April, the regulations concerning the manner of determining the fulfillment of the conditions for obtaining approval and consent for the organization of games of chance were amended. In May 2025, the Rulebook on the conditions and procedure for verifying players at the organizers of special games of chance through means of electronic communication was adopted.

Also, by the end of May 2025, the amendments to the following regulations concerning the keeping of records and the payment of fees were also adopted:

1. Rulebook on the manner of keeping records and reporting on payments received, payments made, as well as stakes realized, i.e., winnings for each pay-in-pay-out desk per betting shop,
2. Rulebook on the manner of keeping records and reporting on payments received, payments made, as well as realized stakes, i.e., winnings per slot machine,
3. Rulebook on the manner of keeping records and reporting on payments received, payments made, realized stakes and winnings made for special games of chance through means of electronic communication and
4. Rulebook on the content of records on the basis for calculation and payment of fees for organizing special games of chance in a casino and on the content of the monthly calculation of fees for organizing those games.

In June 2025, the Rulebook on the technical procedure and method of data exchange in connection with the self-exclusion of players from participation in special games of chance via means of electronic communication was adopted. It governs the technical procedure, the method of reporting, and the exchange of data with the organizers. The organizer allows self-exclusion to a player who has a registered user account based on the player's request for self-exclusion.

The player can submit a request for its exclusion from participation in special games of chance through means of electronic communication through their registered user account, on the organizer's website, or personally submitting a written request for self-exclusion at the organizer's premises. The Rulebook prescribes the mandatory elements of the request.

Immediately upon receiving a player's request for self-exclusion, the organizer disables that player's access to the user account and exchanges data with the Games of Chance Administration. The Games of Chance Administration exchanges data with all organizers, who immediately after receiving this information shall disable access to the user account. Before registering a new player's user account, the organizer checks electronically, through the Games of Chance Administration's software solution, whether the person applying for user account registration is in the records of self-excluded players. The recall of the self-exclusion is possible after the expiration of a period of 12 months, if the player submitted a request for self-exclusion for a period longer than 12 months or for a permanent self-exclusion. The Rulebook also prescribes the mandatory elements of a recall request.

Finally, it should be remembered that the Law expanded the measures of inspection supervision and tightened the measures in case of established irregularities, or of a failure to remedy them, as well as in the case of gambling by minors.

Penal provisions have been expanded, i.e., new misdemeanours are foreseen for violation of newly established obligations, for which a fine of RSD 100,000 to RSD 2,000,000 can be imposed for a legal entity and for a responsible person in a legal entity with a fine of RSD 5,000 to RSD 150,000.

Hence, it is important for the organizers of games of chance to prepare and check the necessary actions and required measures in a timely manner with the aim of complying with the new obligations and requirements, according to the Law and new by-laws within the prescribed deadlines.

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