

# Ukrainian Gambling Guide



## 1. What types of gambling activities and games are currently legal in Ukraine?

Almost all types of land-based and online gambling activities and games are currently legal in Ukraine:

- *Land-based and online casino games*

Casino games are defined as games of chance such as roulette, card table games (including poker, blackjack), craps and slot machines.

- *Slot machine games*
- *Land-based and online betting*

Sports and horse betting, parimutuel betting, social, political, cultural, entertaining or competition betting.

- *Online poker*

- *Games of skill*

Skill games and competitions with no element of chance are currently not considered gambling, including tarot, bridge, chess, sport poker. Betting on the results of skill games and competitions is gambling.

## 2. What are the relevant authorities and regulations in Ukraine?

The key act that regulates gambling activities and games is the Law “On the state regulation of activities related to organization and conduct of gambling” dated July, 14, 2020 (“**Gambling Law**”). Adopted secondary regulations include:

1. Regulation of the Cabinet of Ministers of Ukraine on establishment and authorities of the Commission for the Regulation of Gambling and Lotteries (“Gambling Commission”) dated September, 23, 2020.
2. Regulation of the Cabinet of Ministers of Ukraine No. 1341 dated December 21, 2020, establishes licensing terms and conditions for each gambling activity set out in the Gambling Law.

3. The Act of the Gambling Commission No. 26 dated December 17, 2020, establishes rules for issuing to owners of premises permission for the conduct of gambling activity.

Other regulations required under the Gambling Law will be approved the Cabinet of Ministers of Ukraine and the Gambling Commission soon.

In addition to the key regulations, there are a number of other Ukrainian laws affecting gambling activities, namely taxation, advertising requirements, money laundering and banking regulation, and customer protection laws. More specific legislation is described below.



### 3. What requirements are placed upon gambling operator licensees? Can one operator hold different gambling licenses?

The Gambling Law does not limit the number of licenses that can be granted or establish tender procedures. Therefore, any applicant that fulfils the established requirements and pays the license fee can become a gambling operator.

An applicant for a gambling license must be a company registered in Ukraine fulfilling the following criteria:

1. Minimum charter capital of UAH 30 million (approx. US\$1.079 million) paid with funds from confirmed sources (submitted tax return, bank deposit, dividend distributions, etc.);
2. A shareholder, controller, owner, ultimate beneficial owner, executive of a Ukrainian applicant cannot be a Russian company or citizen and must not own, directly or indirectly, any company in Russia.
3. A shareholder of a Ukrainian applicant cannot be a company registered in the FATF jurisdictions list.

No other shareholding restrictions are imposed on companies carrying out gambling activity in Ukraine.

A company may lawfully offer land-based and/or online gambling games in Ukraine only based on the gambling license issued by the Gambling Commission. The Gambling Law envisages six key gambling licenses:

- Land-based casinos;
- Land-based slot machine halls;
- Land-based hippodrome pool betting;
- Land-based and online betting;
- Online casinos;
- Online poker.

License fees are calculated based on the amount of the minimum monthly salary established on 1 January of the year the relevant license was issued.

An issued license or licensee's rights under a relevant license cannot be sold or otherwise transferred to another entity. A gambling operator that received a license can conduct gambling activity only under one brand.

The Gambling Law does not restrict the number of gambling licenses that can be issued to one operator. Therefore, one gambling operator can simultaneously obtain one or all six key gambling licenses if it satisfies the established requirements and can pay a fee for each license.

Each gambling operator shall hold a banking deposit or a banking guarantee for the minimum amount of UAH 43.2 million (for 2021) (approx. US\$1.554 million), ensuring payment of winnings.

Each land-based gaming operator shall equip its premises with security and video surveillance systems.

All gaming equipment and software shall be certified and occasionally inspected by a certification entity approved by the Gambling Commission.

Every piece of gaming equipment of a land-based gambling operator and the online gambling platform of an online operator must be connected to the State System of Online Monitoring administrated by the Gambling Commission and transfer data to it in real time.

No special permissions or licenses are required for managers and employees of a casino and other gambling operators.

## 4. What documents must a license seeker file to the Gambling Commission to obtain a license?

Here is the list of documents that each license applicant has to submit to the Gambling Commission, irrespective of the type of license sought:

1. The standard application form;
2. The statutory documents of an applicant and documents confirming the authority to act on behalf of an applicant.
3. A certified extract from a foreign trade registrar if an applicant shareholder is a foreign legal entity;
4. An auditor statement confirming that the applicant's capital has been fully paid;
5. Confirmation of the source of funds used to form the applicant's capital (e.g., financial statement of a founding legal entity or personal tax return of a founding individual).
6. Certificates of clean criminal records for the applicant's top management, substantial shareholders, and ultimate beneficial owners;
7. Title or lease documents to the premises permitted for the conduct of land-based gambling activities;
8. Documents confirming that the premises to be used for land-based gambling activities are located on the territory of a special zone and have respective permission from the Gambling Commission;
9. A document confirming the right of an applicant or its shareholder to use "TM name", the.UA domain name, and information about the hosting provider for online gambling licenses.
10. Documents proving that an applicant and its shareholder(s)/ beneficial owner(s) and/or top managers are not, directly or indirectly, controlled/ owned/ related to an entity or a person resident(s) in Russia.
11. Documents proving that the applicant does not hold, directly or indirectly, shares in any Russian company.
12. Documents proving that the applicant's shareholder(s) is not registered in the jurisdictions listed in the FATF list.
13. Shareholding structure and identification information about the ultimate beneficial owner(s) of an applicant.
14. Documents confirming the fulfilment of personnel, equipment, security systems and other requirements established for land-based and online gambling licenses.
15. Title and certification documents for each gambling table, roulette wheel, slot machine and software.

In addition to the above listed documents, an applicant shall also file special documents and information established for the relevant type of gambling license. An applicant shall file documents to the Gambling Commission in written or electronic form.



## 5. What are the licenses and requirements for land-based casinos?

**Licenses, fees and duration:** To operate a land-based casino, a Ukrainian operator shall obtain:

1. Land-based casino license.

In 2021, the license fee for a land-based casino in the city of Kyiv amounts to UAH 360 million (approx. US\$12.9 million), and UAH 180 million (approx. US\$6.5 million) in other locations. The license is issued for five years and the license fee is paid annually in equal five instalments. Renewal or extension of the license is not envisaged by the Gambling Law and, accordingly, an operator shall submit to the Gambling Commission an application and documents for a new land-based casino license every five years.

2. "Secondary" licenses for each gambling table, a roulette table and/or a slot machine.

In addition to the key land-based casino license, an operator must obtain "secondary" licenses for each piece of gambling equipment. In 2021, the annual fee for one roulette table is UAH 1.050 million (approx. US\$37,700), for one gambling table without roulette – UAH 540,000 (approx. US\$19,500), for a slot machine – UAH 36,000<sup>1</sup> (approx. US\$1,300). Fees for each secondary licenses are paid on an annual basis.

A land-based casino license allows up to 250 slot machines in one casino hall.

**Gambling Zones:** A land-based casino must be located only within the following "special gaming zones":

1. For the city of Kyiv, a casino is allowed only in 5-star hotels with a minimum of 150 rooms. The minimum area for a casino in a 5-star hotel is at least 500 m<sup>2</sup>, separated from other premises and restricting the uncontrolled entrance of customers without identification.
2. For other large cities (e.g., Lviv, Odessa, Kharkiv, Dnipro, etc.) and other localities in Ukraine, a land-based casino can be located in 5-star and/or 4-star hotels with a minimum of 100 rooms. There is no area requirement for casinos in 4-star hotels, whereas the area of casinos in 5-star hotels cannot be less than 500 m<sup>2</sup>.
3. Recreation complexes located outside of cities with a total area of at least 10,000 m<sup>2</sup> and with a 5-star hotel.
4. The territory of special gambling zones, to be determined by the Cabinet of Ministers of Ukraine.

1. Temporarily, until the state system of online monitoring is placed in operation, an annual fee for a slot machine license shall be tripled.



### Other requirements:

1. **Gambling equipment:** A casino's operator must use gambling equipment certified by an approved certification entity and connected to the State System of Online Monitoring in a quantity of at least:
  - 10 gambling tables (including a minimum of two roulette tables) and 50 slot machines – for cities with a population exceeding 500,000 inhabitants;
  - 5 gambling tables (including a minimum of one roulette table) and 20 slot machines – for the localities and cities with a population below 500,000 inhabitants;

Each slot machine must be equipped with random number generators ensuring the generation of a sequence of numbers or symbols that cannot be predicted based on the results of previous games. No slot machine bill acceptors are allowed in casinos. All slot machines must be certified and manufactured no earlier in 2019. The use of other slot machines as well as slot machines manufactured by or supplied from Russia is prohibited.

2. **Employees:** A land-based casino must employ at least 50 people aged 21 and older. Unlike in many other countries, management and employees are not required to have individual licenses or other permissions to work at casinos.
3. **Working hours:** A casino can be open during certain days or work 24/7 if general conditions of civil security, public order, maximum level of noise and electromagnetic radiation are complied with.

4. **Cash:** A casino chip is the only payment method used in casinos for playing games of chance. A casino accepts only Ukrainian Hryvna in exchange for gaming chips. Chips have no value outside of the casino. No currency exchange offices, ATMs, pawnshops, banks or other lending centers are allowed inside casinos.
5. **Gamblers:** A visitor or a player shall have access to a land-based casino and gamble, if he/she has reached 21 years of age, provided they have ID and are not included in the non-public register of persons with restricted access to gaming establishments/ participation in gambling. An eligible person may obtain a gamer's ID card that works as identification every time he/she enters any land-based or online casino. The casino's administration shall prohibit gambling by visitors who are intoxicated with alcohol or drugs.

A land-based casino shall place information on licenses, gambling rules, winning chances and a statement on possible money loss in both Ukrainian and English.

It is directly prohibited to offer gamblers alcohol beverages, tobacco products or assets subject to special license for free or as a prize.



## 6. Investment licenses for land-based casinos

A land-based casino can be operated under a special “investment license” issued by the Gambling Commission in case of:

1. A separate investment project approved by the Cabinet of Ministers of Ukraine for the gambling industry; OR
2. Construction of a “5-star” hotel (with at least 200 rooms in Kyiv or 150 rooms in other cities) in which the casino will be situated.

An investment license shall be issued free of charge for a 10-year period. At the same time, an investment license holder shall obtain secondary licenses for each gambling table, roulette table, and slot machines, as well as pay annual fees for such licenses.

## 7. Licenses and requirements for land-based slot machine halls

**Licenses, fees and duration:** To operate a land-based slot machine hall, a Ukrainian operator shall obtain:

1. Land-based slot machine hall license  
In 2021, the license fee for a slot machine hall amounts to UAH 45 million (approx. US\$1.62 million). The license is issued for five years and the license fee is paid annually in five equal instalments. Renewal or extension of the license is not envisaged by the Gambling Law and, accordingly, an operator shall submit to the Gambling Commission an application and documents for a new land-based slot machine hall license every five years.
2. “Secondary” licenses for each slot machine.  
In addition to the key license, an operator must obtain a “secondary” license for each slot machine. In 2021, the annual fee for a slot machine is UAH 36,000 (approx. US\$1,300). Fees for each secondary licenses are paid on an annual basis.

A land-based slot machine hall license allows up to 250 slot machines in one hall.

**Gambling zone:** A land-based slot machine hall must be located only within the following “special gaming zones”:

1. For the city of Kyiv, a slot machine hall can operate only in 5-star, 4-star and 3-star hotels with a minimum of 50 rooms.
2. Other localities in Ukraine – a slot machine hall can operate only in 5-star, 4-star and 3-star hotels with a minimum of 25 rooms.

The minimum area for a slot machine hall is at least

300 m<sup>2</sup>, separated from other premises and with restrictions on uncontrolled entrance of customers without identification.

Placement of slot machine halls is prohibited:

- Within the premises of government and municipal authorities;
- Closer than 500 meters to specified types of educational institutions;
- Within the premises of cult buildings, and buildings owned by religious organizations;
- Within residential buildings;
- Within objects of unfinished construction, temporary buildings, small architectural forms.
- Within inhabited areas with a population of less than 10,000 people.

### Other requirements:

To obtain a key land-based slot machine hall license, besides documents and information listed in Section 4, an applicant must submit to the Gambling Commission a due certificate for each slot machine, documents confirming the applicant’s legal title to such slot machines and other information required by the license conditions.

The licensed operator of a slot machine hall must comply with similar requirements to those for the operation of a casino, including material/technical rules on the function of gambling equipment, financial restrictions, and employment and working hours requirements.

Technical and legal requirements for a slot machine that can be used for gaming in a slot machine hall are similar to casinos.

2. Temporarily, until the state system of online monitoring is placed in operation, an annual fee for a “secondary” slot machine license shall be tripled.



## 8 Licenses and requirements for land-based and online betting

**Licenses, fees and duration:** To provide betting activities, a Ukrainian operator shall obtain:

1. Betting license  
In 2021, the license fee for betting activity amounts to UAH 180 million (approx. US\$6.5 million). The license is issued for five years and the license fee is paid annually in five equal instalments. No renewal or extension of the license is envisaged and, accordingly, a betting operator shall obtain a new key betting license every five years. A holder of a key betting license can both operate betting shop(s) and provide online betting.
2. "Secondary" licenses for each betting shop.  
In addition to the key license, a betting operator must obtain "secondary" licenses for each betting shop. In 2021, the annual fee for a betting shop is UAH 180,000 (approx. US\$6.5 million). Fees for each secondary licenses are paid on an annual basis.

Gambling zone: A land-based betting shop must be located only within the following "special gaming zones":

1. For the city of Kyiv, a betting shop can operate only in 5-star, 4-star and 3-star hotels with a minimum of 50 rooms.
2. Other localities in Ukraine – a betting shop can operate only in 5-star, 4-star and 3-star hotels with a minimum of 25 rooms.
3. On the territory of race tracks (hippodromes)

The minimum area for a betting shop is at least 50 m<sup>2</sup>.

Placement of betting shops is prohibited:

- Within the premises of government and municipal authorities;
- Closer than 500 meters to specified types of educational institutions;
- Within the premises of cult buildings, and buildings owned by religious organizations;
- Within residential buildings;
- Within objects of unfinished construction, temporary buildings, small architectural forms.
- Within inhabited areas of less than 10,000 people.

3. Temporarily, until the state system of online monitoring is placed in operation, the annual betting license payment shall be tripled.

### Other requirements:

**Betting events:** The Gambling Law allows making bets on any events where the outcome is unknown, if the player or gambling operator has no means to influence or determine the outcome. This includes a broad range of events, such as sports, cultural, socio-political, entertainment, competition events or any other real events.

**Virtual games and events:** The Gambling Law prohibits betting operators accepting bets on the results of virtual games and events if the results of such games/events are determined by random number generation.

**License documents and information:** To obtain a key betting license, an applicant must submit to the Gambling Commission documents and information listed in Section 4 and other information required by the betting license conditions. Along with the key betting license, an applicant is required to obtain a license for each betting shop by submitting documents confirming the rights of ownership/lease of a premises for a betting shop, or a preliminary agreement evidencing such rights, as well as a description of the premises where the operator plans to carry out betting activity.

A betting license holder must comply with the general license requirements, which are also very similar for licensees holding other types of gambling license. These include organizational, material/technical rules, financial and employment requirements.

An online betting operator shall carry out online betting through a UA domain website or a mobile application after notifying the Gambling Commission. It is required that a betting license holder, or the person (entity) exercising control over the license holder, should be the owner of an online betting website and respective domain name. In addition, the betting operator's online system must comply with specific technical standards related to proper identification of gamblers, protection of personal information, protection against unauthorized access, etc.

An online betting license permits acceptance of online bets both from Ukrainian residents and from other individuals located abroad.

## 9. Licenses and requirements for land-based hippodrome pool betting

The Gambling Law allows owners of hippodromes to place a betting shop within the premises of the hippodrome. Such a betting shop may accept bets on horseracing events held at the hippodrome, based on the rules of stake races.

**Licenses and fees:** The license for hippodrome betting activity is issued for five years and costs UAH 6,000 (approx. US\$214) in 2021. Additionally, a secondary license for a betting shop at the hippodrome will be required. A license fee for a betting shop must be paid annually and, for 2021, it amounts to UAH 180,000 (approx. US\$6,500).

To obtain a license for hippodrome betting activity, besides documents and information listed in Section 4, a hippodrome owner must submit to the Gambling Commission documents confirming his/her title to the hippodrome, along with the description of the premises for a betting shop.

Players must comply with similar rules and requirements to players in betting shops located within hotels.

## 10. What are the requirements for premises provided for land-based gambling activities?

The premises can be used for the operation of land-based gambling establishments (i.e., casino, slot machines hall, and/or betting shops) only if the owners of such premises obtained special permission

from the Gambling Commission confirming that these premises are located within gaming zones and meet established requirements.



## 11.Licenses and requirements for online gambling

Online casino gambling, online poker, and online betting (including the use of mobile applications) are allowed in Ukraine based on respective licenses. The conduct of other online gambling activity is illegal.

**Licenses, fee and duration:** In 2021<sup>4</sup>, the fee for online casino gambling is UAH 39 million (approx. US\$1.4 million), for online poker – UAH 30 million (approx. US\$1.08 million). A primary betting license issued to an operator permits both land-based and online (through a mobile application) betting. The licenses for online gambling are issued for five years and the license fee is paid annually in five equal instalments. Renewal or extension of the license is not envisaged by the Gambling Law and, therefore, an operator must take out a new license for online gambling every five years.

### Special requirements:

1. Servers, database and all technical systems for the conduct of online gambling shall be located only in Ukraine.
2. An operator of online casino, poker or betting provides services to customers through a webpage (and/or mobile application) under one domain (brand) name in the.UA zone included in the public register of licensed online operators.
3. A licensed online gambling operator may accept bets from residents of Ukraine and individuals outside of Ukraine.
4. An online operator provides an online gambling platform. All gamblers must be identified via e-signature, MobileID, BankID or other accepted methods.
5. A gambler may set up game limits by establishing restrictions on the amount of money he/she wish to spend on gambling.
6. Loan gaming/ loan gaming under duress is prohibited.
7. All payments for bets, return of funds and payment of winnings must be cashless.

Online gambling operators shall place on their webpages or mobile applications information on the operator, license, rules, responsible gambling and the risk of gambling addiction and addiction medical treatment.

Online gaming is also restricted to persons included in the non-public registrar of persons with restricted access gaming establishment/participation in gambling.



4. Temporarily, until the state system of online monitoring is placed in operation, the annual payment for an online casino license shall be tripled.

## 12. How is access to non-licensed online platforms restricted in Ukraine?

Operation of websites, mobile applications or access to other online gambling platforms of operators not licensed in Ukraine is prohibited. Upon a request of the Gambling Commission, a non-licensed operator or a hosting provider must block residents of Ukraine

from access to the webpages of non-licensed foreign operators. In addition, banks and payment systems operating in Ukraine must not process the payments made by Ukrainian customers to non-licensed gambling operators.

## 13. Are there any requirements for suppliers of gambling equipment and software?

Ukrainian IT companies shall obtain a gambling software license to supply gambling services or software to Ukrainian and foreign gambling operators. A B2B gambling software license is issued by the Gambling Commission for the period of five years and its cost in 2021 is UAH 1.8 million (approx. US\$64,700).

No gambling software license is required if a Ukrainian gambling operator purchases IT services and/or software from a foreign IT provider duly certified in Ukraine.

## 14. What are the key customer protection requirements for players?

Under the Gambling Law, operators bear broad social responsibility and must respect player protection requirements.

No person under 21 years of age, incapacitated individuals or individuals with limited legal capacity, is allowed to participate in gambling games. Intoxicated individuals, or those identified by the operator as “undesirable”, also may not participate in gambling.

Operators are required to verify the identity of each player and visitor of land-based gambling establishments. Regarding online gambling, operators may identify players through e-signature, sim-card supporting MobileID function, BankID, or other permissible methods of identification.

Operators are obligated to display information about gambling addiction, responsible gambling, and chances of winning. Each gambling establishment or operator’s website (if such operator carries out online gambling) must have information about medical workers specializing in treatment of gambling addiction and information about gambling treatment centers. In addition, operators must conduct trainings for its personnel on responsible gaming and prevention of gambling addiction.

Separately, operators may not grant players any bonuses, payments, gifts, etc., if granting such bonuses depends on player’s losing in the game.

Gambling operators are required to restrict access to gambling facilities for individuals with apparent gambling addiction. A gambler or his/her family may claim compensation from operators that fail to comply with this requirement.

Any person may file an irrevocable request to restrict his/her access to gambling facilities, for a period from six months to three years. In addition, the Gambling Commission or courts may also restrict access to gambling. Thus, a close family member may file an application to the Gambling Commission, requesting to restrict such person’s access to gambling for up to six months. A longer extension (up to 36 months) is possible upon court judgment, also based on the application of a close family member.

## 15. Marketing and advertising requirements and restrictions

A licensed gambling operator is permitted to advertise its trademark and games subject to a number of established restrictions and special requirements:

The following types of advertising and gambling trademarks are banned:

1. Ads on any kind of radio and television from 6 a.m. until 11 p.m.;
2. Outdoor advertising, external and internal ads on transport;
3. In publications and media, except in specialized gambling editions;
4. TV, radio, concert sponsorships (except for broadcasting of sport events) and different events intended for or attended by persons under 21 years of age;
5. On products and entertainment places for persons under 21 years of age.

Only persons over 21 years of age can participate in ads for gambling operators (including photoshoots). All gambling ads must contain a warning label "Caution: Gambling may cause gambling addiction" as well as information on the issued gambling license. Under the Law on Advertising, the content of gambling ads must not be designed to deceive about easy winnings or state that gambling can be a source of income or an alternative to a job.

## 16. What are the financial requirements imposed on gambling operators?

Under the Gambling Law, Ukrainian banks and payment systems operating in Ukraine must not process the payments made to non-licensed operators.

Under the Law of Ukraine № 361-IX "On preventing and combating the legalization (laundering) of incomes obtained by criminal means, terrorist financing and deployment of weapons of mass destruction" dated December 6, 2019 ("Anti-Money Laundering Law"), all gambling operators must provide primary financial monitoring of stakes, return of stakes and payment of winnings, as well as perform due diligence of customers and transactions that involves PEP and/or his/her relatives, payments to/from offshore jurisdictions and the FATF list, cash transactions exceeding UAH 55,000 (approx. US\$1,980).

Stakes and winnings are accepted and paid only in Ukrainian Hryvna and conducted through the cash desk with the use of a registrar of payment transactions. Land-based gambling operators can

use strictly accounted UAH gaming substitutions such as coins, chips, cards etc. that are used only within the issuer's gambling establishment and exchanged with the use of a registrar of payment transactions. Winnings up to UAH 50,000 (approx. US\$1,800) can be paid in cash at the cash desk, whereas winnings exceeding the above mentioned amount are paid by cashless means only.

Winnings can be provided in monetary or material form and must be paid/delivered within 30 days after the request. In case of betting, winnings or return of stakes are paid within 10 business days only to a payer based on his/her ID. It is directly prohibited to pay betting winnings or return betting stakes to a third person, even if a player instructs a betting operator to pay to another person.

All land-based gambling establishments are forbidden to locate in their premises banking or credit institutions, ATMs, pawnshops and currency exchange offices.



## 17. Taxation of gambling operators

Gambling operators are subject to a tax on gross gaming revenue (determined as the positive difference between collected gambling/betting stakes and paid winnings) and Ukrainian corporate income tax.

Under the Tax Code of Ukraine, gambling operators shall pay 18% on gross gaming revenue or 10% on gaming revenues received from slot machines based either in casinos or in slot machine halls. In addition, each gambling operator is subject to regular 18% corporate income tax levied on the profit.

Gambling/betting stakes and winnings are exempted from value added tax in Ukraine.

All gambling operators are also liable tax agents with respect to the 18% personal income tax and 1.5% temporary military tax withheld from the gross amount of employees' salaries, as well as the 22% social contribution on each employee's salary.

Winnings are subject to 18% personal income tax and 1.5% temporary military tax. Taxes shall be deducted from the gross amount of winnings and paid to the budget by a gambling operator.

## 18. Liability and enforcement

The Gambling Law provides for financial liability and annulment of a gambling license in case of violation of gambling legislation by gambling operators.

Gambling law violations subject to financial sanctions

Amount of Financial Sanction	Description of a violation substance
1,000 minimum monthly wages (for 2021, UAH 6 million or approx. US\$175,000).	Unauthorized modification of gaming equipment.
	Acceptance of stakes on uncertified or uninspected gambling equipment subject to compulsory certification and inspection.
	Failure to connect gambling equipment to the state system of online monitoring.
500 minimum monthly wages (for 2021, UAH 3 million or approx. US\$87,500)	Admission to land-based gambling establishment of a person under 21 years of age, a self-restricted or prohibited from gambling person. Gaming by a person under 21 years of age as a result of improper identification of a player by a gambling operator
700 minimum monthly wages (for 2021, UAH 4.2 million or approx. US\$124,000)	For conduct of gambling with a non-licensed roulette table.
350 minimum monthly wages (for 2021, UAH 2.1 million or approx. US\$61,700)	For conduct of gambling with a non-licensed non-roulette table.
24 minimum monthly wages (for 2021, UAH 144,000 or approx. US\$4,200)	For conduct of gambling with a non-licensed slot machine.
160 minimum monthly wages (for 2021, UAH 960,000 or approx. US\$28,200)	For conduct by a betting operator of betting with a non-licensed betting shop.

Violation of legal requirements established for gambling marketing and advertising is subject to financial sanctions amounting to 300 minimum monthly wages (for 2021, UAH 1.8 million or approx. US\$64,700) levied on gambling operators, advertisement producers or distributors.

The Gambling Commission can withdraw the issued gambling license in case of:

- Detection of false information in the documents submitted for a license issuance, as well as criminal records of the operator's beneficial owner(s), top management or a chief accountant;
- Denial of the Gambling Commission's access to inspection;
- Default on license fee payment for more than two months;
- Major breach of investment license's conditions;

- Failure to pay financial sanctions levied by the Gambling Commission;

- Failure to connect gambling equipment, slot machines and online systems to the state system of online monitoring;

- Repeated violation of gambling legislation within one calendar year;

- Repeated failure to place a banking deposit or obtain a banking guarantee ensuring payment of winnings.

Financial and license annulment sanctions listed above are levied by the Gambling Commission only and can be challenged by an operator with a Ukrainian court.

Organization and conduct of land-based and/or online gambling without the respective license(s) is a crime under the Criminal Code of Ukraine punished with a fine from UAH 11,350,000 to UAH 56,750,000 (approx. US\$408,270 to US\$2,041,350).

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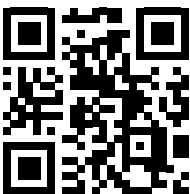
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