Nevis Gaming License – Requirements

B2C and B2B are separate license types, each with their own application and renewal fees. If both are obtained, both will appear on the license, but they cover different activities:

- B2C license: required for operating and offering gaming to end users.
- B2B license: required for supplying or providing games to licensed operators or aggregators.

White-label operations require both a B2C and B2B license, plus separate authorization to operate under a white-label arrangement.

1. Corporate documents

Gaming licenses can only be issued to companies registered in Nevis. For the Nevis-registered company, the following documents must **be certified by a notary in the country of issuance**.

1.1. Certificate of Incorporation.
1.2. Articles of Incorporation.
1.3. Certificate of Incumbency – issued within the last 3 months
1.4. Certificate of Good Standing, confirming that the company is in good standing, has fulfilled all applicable obligations, and is not dissolved, insolvent, or subject to any administration or similar proceedings – required if the company is over 1 year old, issued within the last 3 months
1.5. By-Laws (Does not require to be notarized)

For any parent or overlaying companies in the structure, the following documents must also **be certified by a notary in the country of issuance**:

1.6. Extract/ Incumbency or an equivalent official document confirming the details of all Company Shareholders– issued within the last 3 months
1.7. Certificate of Good Standing, confirming that the company is in good standing, has fulfilled all applicable obligations, and is not dissolved, insolvent, or subject to any administration or similar proceedings – required if the company is over 1 year old, issued within the last 3 months

For corporate directors in the company structure, the following documents must also **be certified by a notary in the country of issuance**:

1.8. Extract/ Incumbency or an equivalent official document confirming the details of all Company Directors– issued within the last 3 months
1.9. Memorandum and Articles of Association. Notary certification must be no older than 90 days.
1.10. Certificate of Good Standing, confirming that the company is in good standing, has fulfilled all applicable obligations, and is not dissolved, insolvent, or subject to any administration or similar proceedings – required if the company is over 1 year old, issued within the last 3 months

2. KYC documentation for directors and shareholders/beneficial owners holding more than 10% ownership or control.

2.1. Completed Personal Form. Kindly note that handwritten submissions will not be accepted

2.2. Completed UBO Declaration Form (applicable only for shareholders/beneficial owners). Kindly note that handwritten submissions will not be accepted.

2.3. Completed SOF/SOW Declaration forms (applicable only for shareholders/beneficial owners). The Source of Funds Declaration must be completed by each Ultimate Beneficial Owner.

2.4. Supporting documents verifying SOF and SOW must be provided. These must clearly demonstrate how the funds to be used in the business were obtained and how the underlying wealth was accumulated. The documentation must align with and support the business plan and financial projections and may include evidence of business income, investments, dividends, salary, asset sales, or capital injections by the UBOs.

2.5. Passport must be a high-resolution, full-colored copy of the data and signature pages of valid international passport. All four corners of the passport must be clearly visible. The copy must be certified by a notary within the last 90 days, and the certifier must also confirm that the photo is a true likeness.

2.6. Proof of Address may include a utility bill (water, electricity, gas, TV cable, or landline telephone; mobile bills are not accepted). If none of the above are available, a bank statement may be provided. To be accepted, the document must be no older than 90 days and must clearly display your full name (as it appears in your passport) and your full residential address. This document must be in English or translated into English by a sworn or certified translator

2.7. Bank Reference Letter (alternative options below) confirming your relationship with a bank where you have maintained an account for a minimum of two (2) years. The letter must be issued on the bank's official letterhead and include the signature of a bank officer, along with the branch's contact details, address must match the proof of address and confirm account is in good standing. The document must be issued within the last 90 days and be in English or translated into English by a sworn or certified translator.

2.8. Alternatives for Bank Reference Letter must be issued within the last 90 days and be in English or translated into English by a sworn or certified translator. One of the following:

- An Account Confirmation Letter issued on official bank letterhead confirming the client's name, account opening date, and a banking relationship of at least two years.
- Bank statements covering the last 6 months and clearly displaying the client's full name.

2.9. Professional Reference Letter of a character nature from a lawyer or accountant who has known you for a minimum of two (2) years. The letter must be issued on the professional's official letterhead and include their signature and full contact details. It must also specify the professional's designation (lawyer or accountant) and include their professional registration number, address must match the proof of address. The document must be issued within the last 90 days and be in English or translated into English by a sworn or certified translator.

2.10. Curriculum Vitae (CV) or résumé outlining your professional experience, educational background, and contact details. The document must be submitted in PDF format. LinkedIn profiles exported in PDF format are also accepted. The document must be in English or translated into English by a sworn or certified translator and must include full name, email, phone number, and address matching Proof of Address.

3. Organizational chart

Signed and dated organizational chart that clearly shows the company structure, including all Directors, Shareholders, and Ultimate Beneficial Owners (UBOs).

4. KYC documentation for Compliance Officer

4.1. The company must appoint a Compliance Officer who is completely independent and cannot be a Director, Shareholder, or Ultimate Beneficial Owner (UBO)

4.2. Required documents for the compliance officer:

- A high-resolution, full-color copy of the Compliance Officer's ID, where all four corners of the document are visible. (**It does not need to be certified**)
- Proof of Address may include a utility bill (water, electricity, gas, TV cable, or landline telephone; mobile bills are not accepted). If none of the above are available, a bank statement may be provided. To be accepted, the document must be no older than 90 days and must clearly display your full name (as it appears in your passport) and your full residential address. This document must be in English or translated into English by a sworn or certified translator
- Completed Personal Form. Kindly note that handwritten submissions will not be accepted
- Curriculum Vitae (CV) or résumé outlining your professional experience, educational background, and contact details. The document must be submitted in PDF format. LinkedIn profiles exported in PDF format are also accepted. The document must be in English or translated into English by a sworn or certified translator and must include full name, email, phone number, and address matching Proof of Address. **Compliance Officer must have at least 1–2 years of relevant industry experience or hold an appropriate degree in a related field.**

4.3. In cases where the Company outsources its compliance function to a third-party service provider, the third-party provider must designate a specific individual to act as the Compliance Officer for the Company. The designated individual must meet the same eligibility criteria set out in section **4.1** and the Company must submit all required documentation listed in section **4.2** for that individual.

5. KYC documentation for Reporting officer

The company is required to appoint a local Reporting Officer who resides in Nevis and is registered with the Nevis FSRC (Financial Services Regulatory Commission).

Local Reporting Officers are typically available through registered agents in Nevis who specialize in company formation and regulatory services. If you are working with a corporate service provider outside of Nevis, they will likely be able to arrange this service for you via their associated registered agents in Nevis. We recommend confirming this directly with your provider to ensure compliance with local requirements.

Required document for the reporting officer:

5.1. Passport must be a high-resolution, full-colored copy of the data and signature pages of valid international passport. All four corners of the passport must be clearly visible. The copy must be certified by a notary within the last 90 days, and the certifier must also confirm that the photo is a true likeness.

5.2. Reporting Officer Appointment Letter that meets the following requirements:

- Dated
- Written in English
- Clearly states the full legal name of the company
- Appoints the full name of the Reporting Officer
- Indicates the effective date of the appointment
- Briefly describes the scope of responsibilities (e.g., reporting and/or point of contact)
- Duly signed by an authorized signatory (name and title must be indicated)
- Includes a signature of acceptance by the Reporting Officer (recommended)

6. Business Plan

Prepare a brief document, signed by the director of the company, that includes the following:

The Business Plan submitted by the Applicant must, at a minimum, address the following requirements:

6.1. **Executive Summary**
A concise overview of the proposed business, including key objectives and strategic direction.

6.2. **Marketing Plan**
A detailed marketing plan including identification of target jurisdictions, customer segments, and any applicable market restrictions. This should also outline customer acquisition and

retention strategies.

6.3. **Unique Selling Proposition (USP)**
A clear description of the Applicant's unique competitive advantages and market positioning.

6.4. **Management and Ownership Information**
Details regarding the professional background and experience of Directors, Shareholders, Compliance Officer and Ultimate Beneficial Owners (UBOs).

6.5. **Financial Projections**
The Business Plan must include detailed financial projections covering the first three (3) years of operation, sufficient to assess the Applicant's financial viability and sustainability. These must include:

- Revenue forecasts supported by clearly stated assumptions
- A breakdown of key cost categories
- Projected Profit and Loss statements
- Cash Flow projections

The Business Plan must also clearly identify all sources of funding, including capital injections and contributions from Shareholders or UBOs.
High-level summaries without supporting figures and underlying assumptions will not be considered sufficient.

6.6. **Key Suppliers and Platform Providers**
Details of all key suppliers, partners, and platform providers involved in the operation.

6.7. **Internal Policies and Governance Framework**
A structured summary of the Applicant's internal policy framework demonstrating commitment to operational excellence, sound governance, and regulatory compliance. At a minimum, this must cover:

- Data Protection & Privacy
- Financial Controls
- HR & Recruitment
- Customer Success & Player Protection

6.8. **Regulatory Compliance Framework**
An explanation of how the company will ensure compliance with applicable regulatory obligations, including:

- AML/CTF controls
- Responsible gambling measures
- KYC procedures
- Fraud prevention
- Internal monitoring systems

6.9. **Corporate Structure and Legal Entity Information**
Details of the legal entity applying for the license, including corporate structure, Shareholders, Ultimate Beneficial Owners (UBOs), and any group entities involved in the operation.

To obtain a B2C license, the following supporting documents are required:

- Completed License Application Form. Kindly note that handwritten submissions will not be accepted
- Proof of domain ownership – showing ownership of each licensed domain/URL
- GEO IP blocking implemented to the **following jurisdictions**:
- Compliant Terms & Conditions (Please provide it dated and signed in pdf format)
- KYC, Responsible Gaming, Underage Gaming, and AML policies. (Please provide it dated and signed in pdf format).
- Please upload signed or countersigned copies of agreements with your gaming, betting, or other content providers. Where proprietary/in-house gaming content uses a Random Number Generator (RNG), please provide the applicable RNG/testing certificates issued by an independent testing laboratory such as GLI or iTech Labs.
- Alternative Dispute Resolution (ADR) Provider - All **B2C operators** are required to appoint an approved **Alternative Dispute Resolution (ADR)** provider before a license can be granted. Company needs to select one of the following approved ADR providers:
    - **ABC-ADR** – https://abc-adr.com
    - **EGIS-ADR** – https://egis-adr.com
    - **CADRE B.V.** – https://cadre.online/

  Proof of Engagement must be provided during the application process, proof can be one of the following:
    - A Letter of Engagement
    - A signed ADR Services Agreement; or
    - A Letter of Appointment issued by the ADR provider.
    - Any document that clearly confirms the ADR arrangement is in place will be accepted.

To obtain a B2B license, the following supporting documents are required:

- Completed License Application Form. Kindly note that handwritten submissions will not be accepted
- Proof of domain ownership – showing ownership of each licensed domain/URL
- Compliant Terms & Conditions (Please provide it dated and signed in pdf format)
- KYB policy (Please provide it dated and signed in pdf format).
- B2B draft agreements- Copy of agreement template used to license operators
- Business Model- Provide a brief description of the business model (own games, aggregation of games, etc.)
- RNG Testing Certificates – Where proprietary/in-house gaming content uses a Random Number Generator (RNG), please provide RNG testing certificates issued by an

independent testing laboratory (e.g., GLI, iTech Labs or others). If the games are developed by third-party outsourcers, please provide a contract with them.